

**IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO
CIVIL DIVISION**

GIBSON BROS, INC., *et al.*,

Plaintiffs,

vs.

**OBERLIN COLLEGE aka OBERLIN
COLLEGE AND CONSERVATORY,
et al.,**

Defendants.

CASE NO. 17CV193761

JUDGE JOHN R. MIRALDI

**JURY INTERROGATORY #1 – GIBSON BROS., INC. LIBEL CLAIM AGAINST
OBERLIN COLLEGE**

A. Did Gibson Bros. Inc. prove by a preponderance of the evidence that Oberlin College libeled it?

Please circle one: YES or NO

If six (6) or more jurors answered “NO” to part (A), skip parts (B) and (C) and sign the general verdict form that follows this Interrogatory for Oberlin College.

If six (6) or more jurors answered “YES” to part (A), only those jurors shall participate in part (B) below. In order to have found Oberlin College libeled Gibson Bros. Inc., you must answer “YES” to EITHER part (B) or part (C) but not both.

B. Did Gibson Bros. Inc. prove by clear and convincing evidence that Oberlin College acted with actual malice in defaming it?

Please circle one: YES or NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “NO” to part (B), proceed to part (C).

If six (6) or more jurors answered “YES” to part (B) – skip part (C) and sign the general verdict form that follows this Interrogatory for Gibson Bros., Inc.

C. Did Gibson Bros. Inc. prove by clear and convincing evidence that Oberlin College acted with negligence in defaming it?

Please circle one: YES or NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “YES” to part (C) sign the general verdict that follows this interrogatory for Gibson Bros., Inc.

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**GENERAL VERDICT – LIBEL CLAIM OF PLAINTIFF GIBSON BROS., INC.
AGAINST DEFENDANT OBERLIN COLLEGE**

A. We, the jury, do hereby find for the Plaintiff Gibson Bros., Inc., and against Oberlin College, on Gibson Bros., Inc.’s libel claim.

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Oberlin College and against Gibson Bros., Inc. on Gibson Bros., Inc.’s libel claim against Oberlin College

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory.

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**JURY INTERROGATORY #2– GIBSON BROS., INC.’S LIBEL CLAIM AGAINST
MEREDITH RAIMONDO**

A. Did Gibson Bros., Inc. prove by a preponderance of the evidence that Meredith Raimondo libeled it?

Please circle one: YES or NO

If six (6) or more jurors answered “NO” to part (A), skip parts (B) and (C), and sign the general verdict form that follows this Interrogatory for Meredith Raimondo.

If six (6) or more jurors answered “YES” to part (A), only those jurors shall participate in part (B) below. In order to have found Meredith Raimondo libeled Gibson Bros., Inc., you must answer “YES” to EITHER part (B) or part (C) but not both.

B. Did Gibson Bros., Inc. prove by clear and convincing evidence that Meredith Raimondo acted with actual malice in libeling it?

Please circle one: YES or NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “NO” to part (B), proceed to part (C).

If six (6) or more jurors answered “YES” to part (B), skip part (C), and then sign the general verdict form that follows this Interrogatory for Gibson Bros., Inc.

C. Did Gibson Bros., Inc. prove by clear and convincing evidence that Meredith Raimondo acted with negligence in defaming it?

Please circle one: YES or NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “YES” to part (C), sign the general verdict form that follows this Interrogatory for Gibson Bros., Inc.

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JUDGE JOHN R. MIRALDI

**GENERAL VERDICT – LIBEL CLAIM OF PLAINTIFF GIBSON BROS., INC.
AGAINST DEFENDANT MEREDITH RAIMONDO**

A. We, the jury, do hereby find for the Plaintiff Gibson Bros., Inc., and against Meredith Raimondo, on Gibson Bros., Inc.’s libel claim.

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Meredith Raimondo and against Gibson Bros., Inc. on Gibson Bros., Inc.’s libel claim.

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory.

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**JURY INTERROGATORY #3
GIBSON BROS., INC.'S INTENTIONAL INTERFERENCE WITH BUSINESS
RELATIONSHIP CLAIM AGAINST OBERLIN COLLEGE**

A. Did Gibson Bros., Inc. prove by a preponderance of the evidence that Oberlin College intentionally interfered with its business relationship with Bon Appetit Management Company?

Please circle one: YES or NO

If six (6) or more of the jurors have answered “NO” to Interrogatory (A), sign the general verdict that follows this Interrogatory for Oberlin College.

If six (6) or more jurors answered “YES” to part (A), those jurors shall participate in part (B) below.

B. Was Oberlin College's intentional interference with Gibson Bros., Inc.'s business relationship with Bon Appetit a direct and proximate cause of damage to Gibson Bros., Inc.?

Please circle one: YES or NO

_____	_____
_____	_____
_____	_____
_____	_____

If the jurors that answered "YES" to part (A) have answered "NO" to part (B), sign the general verdict that follows this Interrogatory for Oberlin College.

If the jurors that answered "YES" to part (A) have answered "YES" to part (B), sign the general verdict that follows this Interrogatory for Gibson Bros., Inc.

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**GENERAL VERDICT –GIBSON BROS., INC.’S INTENTIONAL INTERFERENCE
WITH BUSINESS RELATIONSHIP CLAIM AGAINST OBERLIN COLLEGE**

A. We, the jury, do hereby find for the Plaintiff Gibson Bros., Inc., on its claim for intentional interference with business relationship against Oberlin College

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Oberlin College on Gibson Bros., Inc.’s claim for intentional interference with business relationship.

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory

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**JURY INTERROGATORY #4
GIBSON BROS., INC.'S INTENTIONAL INTERFERENCE WITH BUSINESS
RELATIONSHIP CLAIM AGAINST MEREDITH RAIMONDO**

A. Did Gibson Bros., Inc. prove by a preponderance of the evidence that Meredith Raimondo intentionally interfered with its business relationship with Bon Appetit Management Company?

Please circle one: YES or NO

If six (6) or more of the jurors have answered “NO” to Interrogatory (A), skip part (B) and sign the general verdict that follows this Interrogatory for Meredith Raimondo.

If six (6) or more jurors answered “YES” to part (A), those jurors shall participate in part (B) below.

B. Was Meredith Raimondo's intentional interference with Gibson Bros., Inc.'s business relationship with Bon Appetit Management Company a direct and proximate cause of damage to Gibson Bros., Inc.?

Please circle one: YES or NO

_____	_____
_____	_____
_____	_____
_____	_____

If the jurors that answered "YES" to part (A) have answered "NO" to part (B), sign the general verdict that follows this Interrogatory for Meredith Raimondo.

If the jurors that answered "YES" to part (A) have answered "YES" to part (B), sign the general verdict that follows this Interrogatory for Gibson Bros., Inc.

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**GENERAL VERDICT –GIBSON BROS., INC.’S INTENTIONAL INTERFERENCE
WITH BUSINESS RELATIONSHIP CLAIM AGAINST MEREDITH RAIMONDO**

A. We, the jury, do hereby find for the Plaintiff Gibson Bros., Inc., on its claim for intentional interference with business relationship against Meredith Raimondo.

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Meredith Raimondo on Gibson Bros., Inc.’s claim for intentional interference with business relationship.

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory

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COMPENSATORY DAMAGES FOR GIBSON BROS., INC.

Please specify the amount of damages, past and future, you are awarding to Plaintiff Gibson Bros., Inc.:

Total Compensatory Damages: \$ _____.

Amount of total compensatory damages that represents past economic loss:

\$ _____

Amount of the total compensatory damages that represents future economic loss:

\$ _____
