

COMMONWEALTH OF MASSACHUSETTS



SUFFOLK, ss.

SUPERIOR COURT
DEPARTMENT
OF THE TRIAL COURT

DR. DAVID M. SABATINI,
Plaintiff and Counterclaim Defendant

v.

DR. KRISTIN A. KNOUSE,
Defendant and Counterclaim Plaintiff

Civil Action No.: 2284CV01449

JURY VERDICT QUESTIONNAIRE

Dr. Sabatini's Claim for Defamation

1. Did Dr. David Sabatini prove defamation by Dr. Kristin Knouse?

X YES NO

If you answered YES to Question 1, proceed to Question 2. If you answered NO, proceed to Question 3.

2. What amount of damages will fully and fairly compensate Dr. David Sabatini for defamation that he suffered?

Amount in Numbers: 500,000

Amount in Words: five hundred thousand

Dr. Sabatini's Claim for Tortious Interference with Contractual Relations (with respect to the Whitehead Institute, HHMI, MIT and/or certain biotechnology companies)

3. Did Dr. David Sabatini prove that Dr. Kristin Knouse tortiously interfered with his contractual relationships?

X YES NO

If you answered YES to Question 3, proceed to Question 4. If you answered NO, proceed to Question 5.

4. What amount of damages will fully and fairly compensate Dr. David Sabatini for Dr. Knouse's tortious interference with contractual relationships?

Amount in Numbers: 3,200,000

Amount in Words: three million two hundred thousand

Dr. Sabatini's Claim for Tortious Interference with Advantageous Relations (with respect to NYU/Langone and/or Sloane Kettering Cancer Institute)

5. Did Dr. David Sabatini prove that Dr. Kristin Knouse tortiously interfered with his prospective advantageous relationships?

X YES NO

If you answered YES to Question 5, proceed to Question 6. If you answered NO, proceed to Question 7.

6. What amount of damages will fully and fairly compensate Dr. David Sabatini for Dr. Knouse's tortious interference with prospective advantageous relationships?

Amount in Numbers: 2,300,000

Amount in Words: two million three hundred thousand

Total Compensation to Dr. Sabatini/Avoiding Duplication

Answer Question 7 only if you awarded damages in response to more than one damages question at Numbers 2, 4, and 6.

7. State the total amount of money that will fully and fairly compensate Dr. Sabatini for the harm you found. If the same harm is included in more than one of your answers to Questions 2, 4 and 6, count that harm only once in this total. Do not change your answers to Questions 2, 4 or 6.

Total Amount in Numbers: ~~5,500,000~~ 6,000,000

Total Amount in Words: ~~five million five hundred thousand~~ six million

Dr. Knouse's Claims for Sexual Harassment in the Workplace (chapter 151B)

8. Quid Pro Quo Sexual Harassment: Did Dr. Kristin Knouse prove that Dr. David Sabatini engaged in quid pro quo sexual harassment?

 YES X NO

If you answered YES to Question 8, proceed to Question 9. If you answered NO, proceed to Question 10.

9. What amount of damages will fully and fairly compensate Dr. Knouse's for Dr. Sabatini's quid pro quo sexual harassment?

Amount in Numbers: _____

Amount in Words: _____

10. Applying the court's instructions on "Statute of Limitations/Continuing Violation Doctrine," do you find that an act that is part of quid pro quo sexual harassment occurred on or after June 19, 2020, and that the continuing violation doctrine applies so that you considered earlier acts of quid pro quo sexual harassment in determining liability and damages?

_____ YES X NO

11. Hostile Work Environment Sexual Harassment: Did Dr. Kristin Knouse prove that Dr. David Sabatini's conduct created a sexually hostile work environment for Dr. Knouse?

_____ YES X NO

If you answered YES to Question 11, proceed to Question 12. If you answered NO, proceed to Question 13.

12. What amount of damages will fully and fairly compensate Dr. Knouse's for Dr. Sabatini's creation of a sexually hostile work environment?

Amount in Numbers: _____

Amount in Words: _____

13. Applying the court's instructions on "Statute of Limitations/Continuing Violation Doctrine," do you find that an act that was part of the sexually hostile work environment occurred on or after June 19, 2020, and that the continuing violation doctrine applies so that you considered earlier acts that were part of a sexually hostile work environment in determining liability and damages?

_____ YES X NO

14. Retaliation based on Exercising Rights under Anti-Discrimination Law: Did Dr. Kristin Knouse prove that Dr. Sabatini retaliated against her for her exercise of rights under chapter 151B?

____ YES ☒ NO

If you answered YES to Question 14, proceed to Question 15 and 16. If you answered NO, proceed to Question 17.

15. What amount of damages will fully and fairly compensate Dr. Knouse for Dr. Sabatini's retaliation?

Amount in Numbers: _____

Amount in Words: _____

16. If any portion of the damages you awarded in response to Question 15 was based on Dr. Sabatini's filing of a lawsuit against Dr. Knouse and any publicity efforts surrounding the filing of a lawsuit, identify here the amount of damages awarded in response to Question 15 that was based on Dr. Sabatini's filing of a lawsuit against Dr. Knouse and any publicity efforts surrounding the filing of a lawsuit.

Amount in Numbers: _____

Amount in Words: _____

Dr. Knouse's Claims for Sexual Harassment in the Educational Environment (chapter 214, s. 1C)

17. Quid Pro Quo Sexual Harassment: Did Dr. Kristin Knouse prove that Dr. David Sabatini engaged in quid pro quo sexual harassment in the educational environment?

____ YES ☒ NO

If you answered YES to Question 17, proceed to Question 18. If you answered NO, proceed to Question 19.

18. What amount of damages will fully and fairly compensate Dr. Knouse's for Dr. Sabatini's quid pro quo sexual harassment in the educational environment?

Amount in Numbers: _____

Amount in Words: _____

19. Hostile Work Environment Sexual Harassment: Did Dr. Kristin Knouse prove that Dr. David Sabatini's conduct created a sexually hostile educational environment?

____ YES

☒ NO

If you answered YES to Question 19, proceed to Question 20. If you answered NO, proceed to Question 21.

20. What amount of damages will fully and fairly compensate Dr. Knouse for Dr. Sabatini's creation of a sexually hostile educational environment?

Amount in Numbers: _____

Amount in Words: _____

Total Compensation to Dr. Knouse/Avoiding Duplication

Answer Question 21 only if you awarded damages in response to more than one damages question at Numbers 9, 12, 15, 18 and 20.

21. State the total amount of money that will fully and fairly compensate Dr. Knouse for the harm you found. If the same harm is included in more than one of your answers to Questions 9, 12, 15, 18 and 20, count that harm only once in this total. Do not change your answers to Questions 9, 12, 15, 18 and 20.

Total Amount in Numbers: _____

Total Amount in Words: _____

Punitive Damages

Answer Question 22 only if you found Dr. Sabatini liable for one or more forms of sexual harassment or retaliation, that is, only if you answered YES to one or more of Questions 8, 11, 14, 17 and 19.

22. Did Dr. Knouse prove that Dr. Sabatini's conduct in violating G.L. c. 151B (sexual harassment and/or retaliation) was outrageous or egregious, such that Dr. Knouse is entitled to recover punitive damages?

____ YES

☒ NO

If you answered YES to Question 22, proceed to Question 23 and 24. If you answered NO, proceed to Question 25.

23. Identify, by placing a check mark next to the identified claim, those claims that serve as the basis for your award of punitive damages. (You may only check a particular claim if you answered YES to the liability question for that claim).

Workplace Quid Pro Quo Sexual Harassment: _____

Workplace Hostile Work Environment Sexual Harassment: _____

Workplace Retaliation Claim: _____

Education Quid Pro Quo Sexual Harassment: _____

Education Hostile Work Environment Sexual Harassment: _____

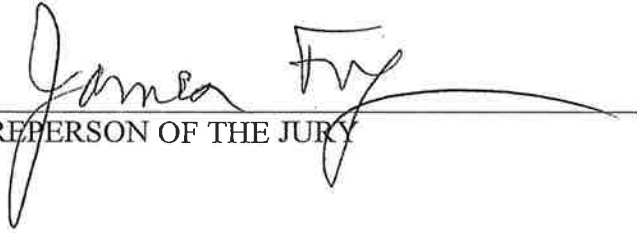
24. Identify the total amount of punitive damages awarded to Dr. Knouse due to Dr. Sabatini's egregious or outrageous violations of the Anti-Discrimination laws.

Punitive Damages Amount in Numbers: _____

Punitive Damages Amount in Words: _____

By signing below the foreperson certifies that each of the questions answered above was determined by at least 11 of the 13 deliberating jurors.

DATE: October 16, 2026


FOREPERSON OF THE JURY