

FILED
Superior Court of California
County of Los Angeles

JUN 26 2025

David W. Stayton, Executive Officer/Clerk of Court
By: J. Marquez, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

NANCY VALLA, an individual,

Plaintiff,

vs.

DIGNITY HEALTH, a corporation; ST.
MARY MEDICAL CENTER LONG
BEACH, an entity of unknown form

Defendants.

Case No. 20STCV30610

SPECIAL VERDICT FORM

07/01/2025

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We, the jury in the above action, find the following Special Verdict Form on the questions submitted to us:

General Information

Question No. 1: Was St. Mary Medical Center/Dignity Health Plaintiff's employer?

Yes X No

If your answer to Question No. 1 is "Yes", answer the next question.

Whistle-Blower Protection Cause of Action (VF-4602)

Question No. 2: Did Nancy Valla disclose information and/or did St. Mary Medical Center/Dignity Health believe that Nancy Valla disclosed or might disclose information to a government agency and/or to an employee with authority over Nancy Valla or with authority to investigate, discover, or correct legal violations or non-compliance?

Yes ✓ No

If your answer to question in Question No. 2 is "Yes," answer Question No. 3. If your answer to Question 2 is "No," then skip to Question 8.

Question No. 3: Did Nancy Valla have reasonable cause to believe that the information disclosed a violation of a state or federal statute, rule or regulation?

Yes ✓ No

If your answer was yes, answer the next four questions: a through d. If your answer was no skip to Question 8.

a.) Sterile Processing Department (Title 22)

Yes ✓ No

b.) March 2, 2019 suicide (EMTALA)

Yes ✓ No

c.) Anesthesia Machines (Title 22)

Yes ✓ No

07/01/2025

1 d.) Defibrillators (Title 22)

2 Yes No

3
4 **Question No. 4:** Did St. Mary Medical Center/Dignity Health take adverse employment action
5 against Nancy Valla?

6 Yes No

7 If your answer to Question No. 4 is "Yes," answer Question No. 5. If your answer to Question 4
8 is "No," then skip to Question 8.

9
10 **Question No. 5:** Was Nancy Valla's disclosure of information and/or St Mary Medical
11 Center/Dignity Health's belief that Nancy Valla did or might disclose information a contributing factor
12 in St. Mary Medical Center/Dignity Health's decision to take adverse employment action against Nancy
13 Valla?

14 Yes No

15 If your answer to Question No. 5 is "Yes," answer Question No. 6. If your answer to Question 5
16 is "No," then skip to Question 8.

17
18 **Question No. 6:** Was St. Mary Medical Center/Dignity Health's conduct a substantial factor in
19 causing Nancy Valla's harm?

20 Yes No

21 If your answer to Question No. 6 is "Yes," answer Question No. 7. If your answer to Question 6
22 is "No," then skip to Question 8.

23
24 **Question No. 7:** Did St. Mary Medical Center/Dignity Health prove by clear and convincing
25 evidence that it would have taken the same adverse employment action(s) against Nancy Valla anyway
26 at that time for legitimate, independent reasons?

27 Yes No

28 Regardless of how you answered Question 7, answer Question 8.

1 **Failure to Provide Reasonable Accommodation(s) (VF-2509)**

2 **Question No. 8:** Did Nancy Valla have a mental condition that limited her ability to engage in a
3 major life activity, including working as the Chief Nursing Officer at St. Mary Medical Center/Dignity
4 Health, or did St. Mary Medical Center/Dignity Health treat her as if she had a mental condition that
5 limited her ability to engage in a major life activity, including working as the Chief Nursing Officer at
6 St. Mary Medical Center/Dignity Health?

7 Yes No

8 If your answer to question in Question No. 8 is "Yes," answer Question No. 9. If your answer
9 to Question 8 is "No," then skip to Question 18 if you reached and answered "No" to Question
10 No. 7. Otherwise, stop here, answer no further questions and have your Presiding Juror sign and
11 date this form.

12
13 **Question No. 9:** Did St. Mary Medical Center/Dignity Health know of Nancy Valla's mental
14 condition that limited her ability to engage in a major life activity, including working as the Chief
15 Nursing Officer at Dignity Health?

16 Yes No

17 If your answer to question in Question No. 9 is "Yes," answer Question No. 10. If your answer
18 to Question 10 is "No," then skip to Question 13.

19
20 **Question No. 10:** Was Nancy Valla able to perform the essential job duties with reasonable
21 accommodation(s) for her mental condition?

22 Yes No

23 If your answer to question in Question No. 10 is "Yes," answer Question No. 11. If your
24 answer to Question 10 is "No," then skip to Question 13.

1 **Question No. 11:** Did St. Mary Medical Center/ Dignity Health fail to provide reasonable
2 accommodation(s) for Nancy Valla's mental condition?

3 Yes No

4 If your answer to question in Question No. 11 is "Yes," answer Question No. 12. If your
5 answer to Question 11 is "No," then skip to Question 13.

6
7 **Question No. 12:** Was St. Mary Medical Center/Dignity Health's failure to provide reasonable
8 accommodation(s) a substantial factor in causing harm to Nancy Valla?

9 Yes No

10 If your answer to question in Question No. 12 is "Yes," answer Question No. 13. If your
11 answer to Question 13 is "No," then skip to Question 13.

12
13 **Failure to Engage in Timely, Good-Faith Interactive Process (VF-2513)**

14 **Question No. 13:** Did Nancy Valla request that St. Mary Medical Center/Dignity Health make
15 reasonable accommodation for her mental condition, so that she would be able to perform the essential
16 job requirements?

17 Yes No

18 If your answer to question in Question No. 13 is "Yes," answer Question No. 14. If your
19 answer to Question 13 is "No," then skip to Question 18 if you reached and answered "No" to
20 Question 7 and/or reached and answered "Yes" to Question 12. Otherwise, stop here, answer no
21 further questions and have your Presiding Juror sign and date this form.

22
23 **Question No. 14:** Was Nancy Valla willing to participate in an interactive process to determine
24 whether reasonable accommodation could be made so that she would be able to perform the essential job
25 requirements?

26 Yes No

27 If your answer to question in Question No. 14 is "Yes," answer Question No. 15. If your
28 answer to Question 14 is "No," then skip to Question 18 if you reached and answered "No" to

1 Question 7 and/or reached and answered "Yes" to Question 12. Otherwise, stop here, answer no
2 further questions and have your Presiding Juror sign and date this form.

3
4 **Question No. 15:** Did St. Mary Medical Center/Dignity Health fail to participate in a timely,
5 good-faith interactive process with Nancy Valla to determine whether reasonable accommodation could
6 be made?

7 Yes No

8 If your answer to question in Question No. 15 is "Yes," answer Question No. 16. If your
9 answer to Question 15 is "No," then skip to Question 18 if you reached and answered "No" to
10 Question 7 and/or reached and answered "Yes" to Question 12. Otherwise, stop here, answer no
11 further questions and have your Presiding Juror sign and date this form.

12
13 **Question No. 16:** Could St. Mary Medical Center/Dignity Health have made a reasonable
14 accommodation when the interactive process should have taken place?

15 Yes No

16 If your answer to question in Question No. 16 is "Yes," answer Question No. 17. If your
17 answer to Question 16 is "No," then skip to Question 18 if you reached and answered "No" to
18 Question 7 and/or reached and answered "Yes" to Question 12. Otherwise, stop here, answer no
19 further questions and have your Presiding Juror sign and date this form.

20
21 **Question No. 17:** Was St. Mary Medical Center/Dignity Health's failure to participate in a
22 timely, good-faith interactive process a substantial factor in causing harm to Nancy Valla?

23 Yes No

24 Answer Question 18 if you reached and answered "No" to Question No. 7 and/or reached and
25 answered "Yes" to either Question 12 and/or 17. Otherwise, stop here, answer no further
26 questions and have your Presiding Juror sign and date this form.

Damages

Question No. 18: What are Nancy Valla's damages:

Past lost wages, earnings and/or benefits:

\$ 2 500 000. 00

Future lost wages, earnings and/or benefits:

\$ 2 500 00. 00

Past mental suffering, loss of enjoyment of life, inconvenience, grief, anxiety, humiliation and/or emotional distress:

\$ 15 000 000. 00

Future mental suffering, loss of enjoyment of life, inconvenience, grief, anxiety, humiliation and/or emotional distress:

\$ 7 500 000. 00

TOTAL: \$ 27 500 000. 00

You have now completed this verdict form. Please have the foreperson date and sign below.

Dated: 6/26/2025


Foreperson