UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DESIROUS PARTIES UNLIMITED, INC.,

Plaintiff,

vs.

RIGHT CONNECTION, INC., *et al.*

Defendants.

Case No. 2:21-cv-01838-GMN-BNW

VERDICT FORM

FILED ENTERED RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD
OCT - 6 2025
CLERK US DISTRICT COURT
DISTRICT OF NEVADA
BY: DEPUTY

INSTRUCTIONS

Please answer each of the following questions in the order they are presented. In answering the following questions, you must follow the instructions provided by the Court. All of you must agree to an answer. Once you have completed this form, the jury foreperson should sign and date this verdict form and return it to the Court.

SPECIAL INTERROGATORY QUESTIONS

PART I: PLAINTIFF'S TRADEMARK INFRINGEMENT CLAIM

Question No. 1:

Do you find Right Connection liable to Desirous Parties for trademark infringement?

If you find that Desirous Parties is liable to Right Connection for trademark infringement of the Dirty Vibes word mark, then your answer to this question must be no.

- Yes ✓
- No _____

Question No. 2:

Do you find Donald D. Hughes liable to Desirous Parties for trademark infringement?

- Yes ✓
- No _____

If you answered "No" to both Question 1 ***and*** *Question 2, skip to PART II. Otherwise, proceed to the next question.*

Question No. 3:

Did Donald D. Hughes intentionally induce Right Connection to infringe Desirous Parties's trademark? If your answer to Question 1 was "No," your answer to this question must be "No."

- Yes ✓
- No _____

Question No. 4:

If you found that one or both of Right Connection and Donald D. Hughes is liable for trademark infringement, then Desirous Parties is entitled to recover damages that resulted from the infringement.

State the total amount of actual damages, if any, that Desirous Parties has proven were caused by Right Connection and/or Donald D. Hughes's conduct constituting trademark infringement, whether by Right Connection, Inc.; Donald D. Hughes; or both. Ensure that the amount does not include any duplicate damages.

- $ 250,000.00

If you answered "Yes," to both Question 1 ***and*** *Question 2, proceed to the next question.*

If you answered "Yes," to both Question 1 ***and*** *Question 3, proceed to the next question.*

Otherwise, skip to Question 7.

Question No. 5:

If you have found both Right Connection and Donald D. Hughes liable for trademark infringement, did Right Connection and Donald D. Hughes act together such that each is responsible for the same indivisible harm that led to these damages?

- Yes _____

- No ✓

If you answered "Yes," skip to Question 7.

Otherwise, go to the next question.

Question No. 6:

Allocate these damages between Right Connection and Donald D. Hughes. Your allocation percentages must total 100%.

- Defendant Right Connection, Inc.: 70 %
- Defendant Donald D. Hughes, II: 30 %

Question No. 7:

If you found that one or both of Right Connection and Donald D. Hughes is liable for trademark infringement, Desirous Parties is entitled to disgorgement of the profits of the liable Defendant(s) attributable to the infringement.

State the total amount of profit of Donald D. Hughes and Right Connection, if any, attributable to the infringement. This profit constitutes Desirous Parties's disgorgement damages. Ensure the amount does not include any damages awarded as actual damages you awarded in Question 4.

- $ 765,000.00

*If you answered "Yes" to both Question 1 **and** Question 2, proceed to the next question.*

*If you answered "Yes" to both Question 1 **and** Question 3, proceed to the next question.*

Otherwise, skip to PART II.

Question No. 8:

If you have found both Right Connection and Donald D. Hughes liable for trademark infringement, did the Defendants act together such that each is responsible for the same indivisible harm that led to these disgorgement damages?

- Yes _____
- No ✓

If you answered "Yes," skip to PART II. Otherwise, proceed to the next question.

Question No. 9:

Allocate Desirous Parties's disgorgement damages between the Defendants. Your allocations must total 100%.

- Defendant Right Connection, Inc.: 100 %
- Defendant Donald D. Hughes, II: 0 %

PART II: PLAINTIFF'S BREACH OF CONTRACT CLAIM

Question No. 10:

Desirous Parties claims that Right Connection and Donald D. Hughes committed breach of contract by failing to remit to Desirous Parties its agreed-upon share of the profits for the "Wicked Eden" October 2020 event.

Do you find Right Connection liable to Desirous Parties for breach of contract?

- Yes ✓
- No _____

Question No. 11:

Do you find Donald D. Hughes liable to Desirous Parties for breach of contract?

- Yes ✓
- No _____

If you answered "No" to both Question 10 ***and*** *Question 11, skip to PART III. Otherwise, proceed to the next question.*

Question No. 12:

If you found that one or both of the Defendants is liable for breach of contract, Desirous Parties is entitled to recover damages that resulted from the breach.

State the total amount of actual damages, if any, that Desirous Parties has proven were caused by Defendants' conduct constituting breach of contract, whether by Defendant Donald D. Hughes; Defendant Right Connection; or both. Ensure that the amount does not include any duplicate damages.

- $ 73,415.00

If you answered "No" to either Question 10 ***or*** *Question 11, skip to PART III. Otherwise, proceed to the next question.*

Question No. 13:

Did Donald D. Hughes and Right Connection act together such that each is responsible for the same indivisible harm that led to these damages?

- Yes _____
- No ✓

If you answered "Yes," skip to PART III. Otherwise, proceed to the next question.

Question No. 14:

Allocate these damages between the two Defendants. Your allocation percentages must total 100%.

- Defendant Right Connection, Inc.: 30 %
- Defendant Donald D. Hughes, II: 70 %

PART III: PLAINTIFF'S INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE CLAIM

Question No. 15:

Desirous Parties claims that Right Connection and Donald D. Hughes committed intentional interference with its prospective economic advantage.

Do you find Defendant Donald D. Hughes liable to Desirous Parties for intentional interference with prospective economic advantage?

- Yes ✓
- No _____

Question No. 16:

Do you find Right Connection liable to Desirous Parties for intentional interference with prospective economic advantage?

- Yes ✓
- No _____

If you answered "No" to both Question 15 ***and*** *Question 16, skip to PART IV. Otherwise, proceed to the next question.*

Question No. 17:

If you found that one or both of the Defendants is liable for intentional interference with prospective economic advantage, Desirous Parties is entitled to recover damages that resulted from the Defendants' conduct.

State the amount of actual damages, if any, that Desirous Parties has proven were caused by Defendants' conduct constituting intentional interference with prospective economic advantage, whether by Defendant Donald D. Hughes; Defendant Right Connection; or both. Ensure that the amount does not include any duplicate damages.

- $ 382,500.00

*If you answered "No" to either Question 15 **or** Question 16, skip to PART IV. Otherwise, proceed to the next question.*

Question No. 18:

Did Donald D. Hughes and Right Connection act together such that each is responsible for the same indivisible harm that led to these damages?

- Yes _____
- No ✓

If you answered "Yes," skip to PART IV. Otherwise, proceed to the next question.

Question No. 19:

Allocate these damages between the two Defendants. Your allocation percentages must total 100%.

- Defendant Donald D. Hughes, II: 70 %
- Defendant Right Connection, Inc.: 30 %

PART IV: RIGHT CONNECTION'S TRADEMARK CLAIMS

Question No. 20:

Do you find Desirous Parties liable to Right Connection for trademark infringement of the Dirty Vibes word mark?

If you find that Right Connection is liable to Desirous Parties for trademark infringement of the Dirty Vibes word mark, then your answer to this question must be no.

- Yes _____
- No ✓

If you answered "No," skip to Question 22. Otherwise, proceed to the next question.

Question No. 21:

If you found that Desirous Parties is liable for trademark infringement of the Dirty Vibes word mark, Right Connection is entitled to disgorgement of the profits of Desirous Parties attributable to the infringement.

State the total amount of profit of Desirous Parties, if any, attributable to the infringement. This profit constitutes Right Connection's disgorgement damages.

- $_____

Question No. 22:

Do you find Desirous Parties liable to Right Connection for trademark infringement of the "DV Logo"?

- Yes _____
- No ✓

Question No. 23:

Do you find Desirous Parties liable to Right Connection for trademark

infringement of the "Dirty dv Vibes Logo"?

- Yes _____
- No ✓

PART V: RIGHT CONNECTION'S COPYRIGHT CLAIMS

Question No. 24:

Did Desirous Parties infringe Right Connection's copyright of the DV Logo?

- Yes _____
- No ✓

If you answered "No," skip to PART VI. If you answered "Yes," proceed to the next question.

PART VI: RIGHT CONNECTION'S INTERFERENCE WITH PROSPECTIVE ECONOMIC RELATIONS CLAIM

Question No. 25:

Right Connection claims that Desirous Parties committed intentional interference with prospective economic advantage.

Do you find Desirous Parties is liable to Right Connection for intentional interference with prospective economic advantage?

- Yes _____
- No ✓

If you answered "No," please skip to PART VII.

If you answered "Yes," proceed to the next question.

Question No. 26:

If you found that Desirous Parties is liable for intentional interference with prospective economic advantage, Right Connection is entitled to recover damages that resulted from the Defendants' conduct.

State the amount of actual damages, if any, Right Connection has proven were caused by Desirous Parties's conduct constituting intentional interference with prospective economic advantage. Ensure that the amount does not include any duplicate damages.

- $_____

Question 27:

Do you find by clear and convincing evidence that Desirous Parties acted with oppression, fraud, or malice in intentionally interfering with Right Connection's prospective advantage?

- Yes _____

- No _____

If you answered "No," skip to Part VII.

If you answered "Yes," proceed to the next question.

Question 28:

If you found by clear and convincing evidence that Desirous Parties acted with oppression, malice, or fraud, you can award punitive damages to Right Connection.

State the amount of punitive damages, if any, that you award to Right Connection. Ensure that the amount does not include any duplicate damages.

- $_____

PART VII: DON HUGHES'S DEFAMATION CLAIM

Question No. 29:

Donald D. Hughes claims that Desirous Parties defamed him. As a defense to Donald D. Hughes's defamation claim, Desirous Parties alleges truth.

Were the statements made by Desirous Parties about Donald D. Hughes substantially true?

- Yes ✓ JP
- No ~~✓~~

If you answered "No," proceed to the next question.

If you answered "Yes," stop here, answer no further questions, and have the presiding juror sign and date this form.

Question No. 30:

Is Desirous Parties liable to Donald D. Hughes for defamation?

- Yes _____
- No ✓

If you answered "Yes," proceed to the next question.

If you answered "No," stop here, answer no further questions, and have the presiding juror sign and date this form.

Question No. 31:

Did the statements made by Desirous Parties tend to injure Donald D. Hughes in his business or profession?

- Yes _____
- No ✓

If you answered "No," skip to Question 38.

If you answered "Yes," proceed to the next question.

Question No. 32:

If you answered yes to the previous question, you have found that the statements made by Desirous Parties tended to injure Donald D. Hughes in his business or profession. He is therefore entitled to presumed damages reasonably calculated to compensate him for injury to reputation, loss of business, shame, mortification, and hurt feelings.

State the amount of presumed damages, if any, that you award to Donald D. Hughes. Ensure that the amount does not include any duplicate damages.

- $_____

Question 33:

Do you find by clear and convincing evidence that Desirous Parties acted with oppression, fraud, or malice in defaming Donald D. Hughes?

- Yes _____
- No ✓

If you answered "Yes," proceed to the next question.

If you answered "No," stop here, answer no further questions, and have the presiding juror sign and date this form.

Question 34:

If you found by clear and convincing evidence that Desirous Parties acted with oppression, malice, or fraud in defaming Donald D. Hughes, you can award punitive damages to Right Connection.

State the amount of punitive damages, if any, that you award to Donald D. Hughes.

- $_____

You have completed the verdict form. Please have the foreperson sign at the bottom and contact the Court Security Officer (CSO) to let the Court know that you have finished deliberations.

10/6/2025

Date

Foreperson