

IN THE IOWA DISTRICT COURT FOR WARREN COUNTY

IN THE MATTER OF THE ESTATE OF JUDITH A. PERRY and JUDITH A. PERRY REVOCABLE TRUST	CASE NO.: ESPR022355
MATTHEW PERRY; MATTHEW PERRY on behalf of minor children Z.P., J.P., S.P., Plaintiffs, vs. MICHAEL PERRY, Individually and as Proponent of the Judith A. Perry Estate; and as Trustee of the Judith A. Perry Revocable Trust, Defendant,	VERDICT FORM

We, the jury, find the following verdict on the questions submitted to us:

Question No. 1: Was the 4th Amendment to Ms. Perry's Trust Agreement executed January 8, 2024, the product of undue influence?

Answer "yes" or "no"

Answer: Yes

Question No. 2: Was the 3rd Amendment to Ms. Perry's Trust Agreement executed November 7, 2023, the product of undue influence?

Answer "yes" or "no"

Answer: NO

Question No. 3: Was the 2nd Amendment to Ms. Perry's Trust Agreement executed March 23, 2023, the product of undue influence?

Answer "yes" or "no"

Answer: NO

[If you answered "Yes" to Questions 1, 2, and/or 3, answer Question 4. If your answer is "No" to questions 1, 2, and 3, do not answer any further questions on this verdict form.]

QUESTION NO. 4: Did Plaintiffs prove their tortious interference with inheritance claim against Michael Perry?

ANSWER: Yes _____ No ND

If your answer is "no," do not answer any further questions.

QUESTION NO. 5: What are Plaintiffs' damages?

If Plaintiffs has failed to prove any damage, or has failed to prove that any damage was caused by Michael Perry, enter "0" for that item.

Loss of Inheritance: \$ _____

IF YOU ANSWERED "YES" TO QUESTIONS 1-3, to avoid duplicative damages, you should NOT include the amount that Plaintiffs will receive from Judith Perry's Trust under any in your calculation of damages. However, you may still consider that amount if you choose to award punitive damages as described below. After you have answered this question proceed to question 9.

QUESTION NO. 6: Do you find by a preponderance of clear, convincing and satisfactory evidence that the conduct of Michael Perry constituted willful and wanton disregard for the rights or safety of another?

ANSWER: Yes _____ No _____

If your answer is "no," do not answer any further questions.

QUESTION NO. 7: What amount of punitive damages, if any, do you award?

Punitive Damages: \$ _____

If your answer is "\$0," do not answer any further questions.

QUESTION NO. 8: Was the conduct of Michael Perry directed specifically at Plaintiffs?

ANSWER: Yes _____ No _____

Bonita Doshree
FOREPERSON*

*To be signed only if verdict is unanimous.

Juror**

Juror**

Juror**

Juror**

Juror**

Juror**

Juror**

**To be signed by the jurors agreeing to it after six hours or more of deliberation.

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REVOCABLE TRUST

MATTHEW PERRY; MATTHEW PERRY on
behalf of minor children Z.P., J.P., S.P.,

Plaintiffs,

vs.

MICHAEL PERRY, Individually and as
Proponent of the Judith A. Perry Estate; and
as Trustee of the Judith A. Perry Revocable
Trust,

Defendant,

CASE NO.: ESPR022355

SUPPLEMENTAL VERDICT FORM

There is a typo in Verdict Form Question No. 5. The last paragraph should properly state:

IF YOU ANSWERED "YES" TO QUESTIONS 1-3, to avoid duplicative damages, you should NOT include the amount that Plaintiffs will receive from Judith Perry's Trust under any in your calculation of damages. However, you may still consider that amount if you choose to award punitive damages as described below. After you have answered this question, proceed to question 6.

Charles Sinner
District Judge

6/19/26 9:27 a.m.