

IN THE IOWA DISTRICT COURT FOR STORY COUNTY

GERALD F. DETERS and LYNN RAHFELDT, Plaintiffs, v. INTERNATIONAL UNION, SECURITY, POLICE, AND FIRE PROFESSIONALS OF AMERICA, LOCAL UNION #249, Defendant.	CASE NO. LACV050099 VERDICT FORM AND SPECIAL INTERROGATORIES
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Your verdict in this case will be determined by your answers to the following questions. Read the questions and notes carefully because they explain the order in which the questions should be answered.

Question No. 1: As defined in Instruction 7, did Plaintiff Gerald Deters meet his burden by a preponderance of evidence to prove the union discriminated against him based on his age?

☒ Yes ☐ No

Question No. 2: As explained in Instruction 8, did the union prove it would have taken the same course of action regardless of Deters' age?

☐ Yes ☒ No

NOTE: Complete the following Question No. 3 only if you answered "Yes" to Question 1 and "No" to Question 2. If you answered "No" to Question 1 or "Yes" to Question 2, do not answer the next question and proceed to Question 4.

Question No. 3: State the amount of damages, if any, sustained by Deters that were caused by the union's wrongful conduct as to each of the following items of damage, as defined in Instruction 9. If Deters has failed to prove any item of damage, or has failed to prove that any item of damage was caused by the union's wrongful conduct, enter zero for that item.

Past lost wages: \$ 64,000.00 (stating the amount or, if none, write the word "none")

Emotional distress: \$ 3,000.00 (stating the amount or, if none, write the word "none")

Question No. 4: As defined in Instruction 7, did Plaintiff Lynn Rahfeldt meet his burden by a preponderance of evidence to prove the union discriminated against him based on his age?

X Yes No

Question No. 5: As explained in Instruction 8, did the union prove it would have taken the same course of action regardless of Rahfeldt's age?

 Yes X No

NOTE: Complete the following Question No. 6 only if you answered "Yes" to Question 4 and "No" to Question 5. If you answered "No" to Question 4 or "Yes" to Question 5, do not answer the next question; instead, please sign and date the form and inform the court attendant that you have completed your deliberations.

Question No. 6: State the amount of damages, if any, sustained by Rahfeldt that were caused by the union's wrongful conduct as to each of the following items of damage, as defined in Instruction 9. If Rahfeldt has failed to prove any item of damage, or has failed

to prove that any item of damage was caused by the union's wrongful conduct, enter zero for that item.

Past lost wages: \$ 25,000.00 (stating the amount or, if none, write the word "none")

Emotional distress: \$ 25,000.00 (stating the amount or, if none, write the word "none")



FOREPERSON

Dated: November 7, 2019.

*To be signed only if verdict is unanimous.

Juror**

Juror**

Juror**

Juror**

Juror**

Juror**

Juror**

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