

IN THE IOWA DISTRICT COURT IN AND FOR PLYMOUTH COUNTY

EMILY ZUBAID,) CASE NO.: LACV042157**Plaintiff,)****v.) VERDICT FORM****RICHARD BEELNER, JR.,)****Defendant.)**

VERDICT NO. 1 - LIBEL PER SE

Question No. 1: Did Defendant, Richard Beelner, Jr., defame Plaintiff, Emily Zubaid, as set forth in Instruction No. 4?

Answer "yes" or "no."

ANSWER: No

[If your answer is "no," you are finished. Please sign the verdict form below and notify the court attendant that you have reached a verdict.]

Question No. 2: State the amount of damages sustained by Plaintiff, Emily Zubaid, as set forth in Instruction No. 5.

Answer with a dollar amount.

GENERAL DAMAGES ANSWER: _____

LOSS OF REPUTATION ANSWER: _____



FOREPERSON

VERDICT NO. 2 – PUNITIVE DAMAGES

Question No. 1: Do you find by a preponderance of clear, convincing and satisfactory evidence the conduct of Defendant, Richard Beelner, Jr., constituted willful and wanton disregard for the rights or safety of another?

Answer "Yes" or "No"

ANSWER: _____

[If your answer to Question No. 1 is "No" do not answer Question Nos. 2 and 3]

Question No. 2: What amount of punitive damages, if any, do you award?

ANSWER: _____

[If your answer to Question No. 2 is "None" do not answer Question No. 3]

Question No. 3: Was the conduct of Defendant, Richard Beelner, Jr., directed specifically at Plaintiff, Emily Zubaid?

Answer "Yes" or "No"

ANSWER: _____

FOREPERSON