

IN THE IOWA DISTRICT COURT FOR JOHNSON COUNTY

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MARY IRENE NIXON; KATHRYN L. MEACHAM; TONYA DAWN TOLBERT,  
Personal Representative for Estate of Phillip Spieker, deceased; RUSSELL  
D. EHRHARDT, Administrator of Estate of Betty Romp, deceased, f/k/a Elizabeth  
Louis Ostert; SUSAN DAWSON,  
Administrator of Estate of Clarence E. Fifer,  
deceased; HAZEL POTTER DORNBUSH,

Plaintiffs,

vs.

: SETTLEMENT AGREEMENT

STATE OF IOWA,

Defendant.

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COMES NOW the plaintiffs, Kathryn Meacham, Hazel Potter Dornbush, Susan Dawson, Administrator of the Estate of Clarence Eugene Fifer, Deceased Russell D. Ehrhardt, Administrator of the Estate of Betty Romp, Tanya Dawn Tolbert, Personal Representative of the Estate of Phillip Lavern Spieker, and the Defendant, State of Iowa, and pursuant to Iowa Code section 669.9, state as follows:

1. That the defendant hereby offers and the plaintiffs hereby accepts a fair and reasonable sum by way of compromise and settlement of the plaintiff's cause of action, the particulars of which are set forth in the State Appeal Board claim and Petitions on file.
2. That each party shall pay its own costs.
3. That in consideration for the above amount offered, the plaintiffs agrees to release, acquit and forever discharge the defendant, its agencies, divisions, agents, employees and all other persons

from any and all liability whatsoever, including all claims, demands and causes of action of whatever nature, whether known or unknown, which they may have by reason of the allegations as set forth in the plaintiff's Petition in the above-entitled action or any other reason.

4. That it is specifically agreed that the defendant makes this payment only by way of a compromise and that the defendant expressly denies any and all liability as a result of the allegations giving rise to the plaintiff's action.

5. That as provided in Iowa Code section 669.15, 2007 the compensation for the plaintiff's counsel shall be an amount not to exceed forty percent (40%) of the payment, to be paid out of and not in addition to, the above payment.

6. That upon the execution of the Settlement Agreement, the filing of a Court Order pursuant to Iowa Code section 669.9, 2007, the execution of a release and receipt by the plaintiff of the above compromise and settlement payment, ratification by the State Appeal Board and approval by the probate court, where required, the plaintiffs shall dismiss this action with prejudice.

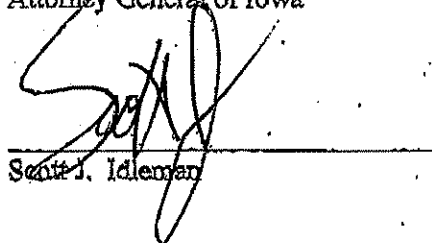
DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2007.



ATTORNEY FOR PLAINTIFF

DATED this 15 day of August, 2007.

THOMAS J. MILLER  
Attorney General of Iowa



Scott J. Ideman

IN THE IOWA DISTRICT COURT FOR JOHNSON COUNTY

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MARY IRENE NIXON; KATHRYN L. MEACHAM; TONYA DAWN TOLBERT, Personal Representative for Estate of Phillip Spieker, deceased; RUSSELL D. EHRHARDT, Administrator of Estate of Betty Romp, deceased, f/k/a Elizabeth Louis Ostert; SUSAN DAWSON, Administrator of Estate of Clarence E. Fifer, deceased; HAZEL POTTER DORNBUSH,

: LAW NO: LACV 063696

Plaintiffs,

vs.

: ORDER APPROVING SETTLEMENT

STATE OF IOWA,

Defendant.

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Having read the executed Settlement Agreement by Kathryn Meacham, Hazel Potter Dornbush, Susan Dawson, Administrator of the Estate of Clarence Eugene Fifer, Deceased Russell D. Ehrhardt, Administrator of the Estate of Betty Romp, Tanya Dawn Tolbert, Personal Representative of the Estate of Phillip Lavern Spieker and the State of Iowa, **IT IS HEREBY ORDERED, ADJUDGED AND DECREED**, that the settlement of this case be approved.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** pursuant to Iowa Code section 669.15 that the fees and expenses of plaintiff's counsel shall be paid out of and not in addition to the compromise and settlement payment and that the fees of plaintiff's counsel shall be an amount not to exceed forty percent of the compromise and settlement payment.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that upon payment to the plaintiff by the defendant, approval/ratification by the State Appeal Board and the execution

of the settlement agreement and release, approval by the probate court where required, the  
plaintiff shall dismiss with prejudice her petition and all causes of action against defendant. *Court*  
*Costs are assessed to the Defendant*  
SO ORDERED this 17 day of August, 2007.

*Renée D. Dillon*  
\_\_\_\_\_  
JUDGE OF THE SIXTH JUDICIAL  
DISTRICT OF IOWA

IN THE IOWA DISTRICT COURT FOR JOHNSON COUNTY

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MARY IRENE NIXON; KATHRYN L. : LAWNO: LACV 063696  
MEACHAM; TONYA DAWN TOLBERT,  
Personal Representative for Estate of :  
Phillip Spieker, deceased; RUSSELL  
D. EHRHARDT, Administrator of Estate :  
of Betty Romp, deceased, f/k/a Elizabeth  
Louis Ostert; SUSAN DAWSON, :  
Administrator of Estate of Clarence E. Fifer,  
deceased; HAZEL POTTER DORNBUSH, :

Plaintiffs, :

Vs. :

SETTLEMENT AGREEMENT  
FOR MARY NIXON

STATE OF IOWA, :

Defendant. :

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COMES NOW the plaintiff, Mary Nixon, and the Defendant, State of Iowa, and pursuant to Iowa Code section 669.9, state as follows;

1. That the defendant hereby offers and the plaintiff hereby accepts a fair and reasonable sum by way of compromise and settlement of the plaintiff's cause of action, the particulars of which are set forth in the State Appeal Board claim and Petitions on file.
2. That each party shall pay its own costs.
3. That in consideration for the above amount offered, the plaintiff agrees to release, acquit and forever discharge the defendant, its agencies, divisions, agents, employees and all other persons from any and all liability whatsoever, including all claims, demands and causes of action of whatever nature, whether known or unknown, which they may have by reason of the allegations as set forth

in the plaintiff's Petition in the above-entitled action or any other reason.

4. That it is specifically agreed that the defendant makes this payment only by way of a compromise and that the defendant expressly denies any and all liability as a result of the allegations giving rise to the plaintiff's action.

5. That as provided in Iowa Code section 669.15, 2007 the compensation for the plaintiff's counsel shall be an amount not to exceed one-third (1/3) of the payment, to be paid out of and not in addition to, the above payment.

6. That upon the execution of the Settlement Agreement, the filing of a Court Order pursuant to Iowa Code section 669.9, 2007, the execution of a release and receipt by the plaintiff of the above compromise and settlement payment; ratification by the State Appeal Board and approval by the probate court, where required, the plaintiff shall dismiss this action with prejudice.

DATED this 16 day of August, 2007.



ATTORNEY FOR PLAINTIFF

DATED this 16 day of August, 2007.

THOMAS J. MILLER  
Attorney General of Iowa



Scott J. Idlerman  
Assistant Attorney General  
Dept. of Justice - Tort Claims  
Hoover State Office Building  
Des Moines, Iowa 50319

IN THE IOWA DISTRICT COURT FOR JOHNSON COUNTY

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MARY IRENE NIXON; KATHRYN L. MEACHAM; TONYA DAWN TOLBERT, : LAW NO: LACV 063696  
Personal Representative for Estate of :  
Phillip Spieker, deceased; RUSSELL :  
D. EHRHARDT, Administrator of Estate :  
of Betty Romp, deceased, f/k/a Elizabeth :  
Louis Ostert; SUSAN DAWSON, :  
Administrator of Estate of Clarence E. Fifer, :  
deceased; HAZEL POTTER DORNBUSH, :

Plaintiffs, :

vs. :

**ORDER APPROVING SETTLEMENT  
REGARDING MARY NIXON**

STATE OF IOWA, :

Defendant. :

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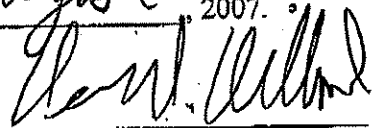
Having read the executed Settlement Agreement by the parties, **IT IS HEREBY ORDERED, ADJUDGED AND DECREED**, that the settlement of this case be approved.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** pursuant to Iowa Code section 669.15 that the fees and expenses of plaintiff's counsel shall be paid out of and not in addition to the compromise and settlement payment and that the fees of plaintiff's counsel shall be an amount not to exceed one-third of the compromise and settlement payment.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that upon payment to the plaintiff by the defendant, approval/ratification by the State Appeal Board and the execution of the release, approval by the probate court, where required, the plaintiff shall dismiss with prejudice her petition and all causes of action against defendant.

*Court Costs are reserved to the Defendant.*

SO ORDERED this 17 day of August, 2007.



JUDGE OF THE SIXTH JUDICIAL  
DISTRICT OF IOWA