

2. *Bequest of Annuity Payments (Article III)*

If Debra survives you, you give any remaining annuity payments payable to you from any GRAT under the Judah 2009 Investment Trust Agreement to the trustees of your Revocable Trust, to hold in the same marital trust for Debra's benefit that will hold the remainder interest in this GRAT.

3. *Residuary Estate (Article IV)*

Your residuary estate is your estate reduced by the bequests described above and by the expenses and debts of your estate. You give your residuary estate to the trustees of your Revocable Trust (discussed in III, below), to be disposed of under its terms.

B. *Administrative Powers (Article VII)*

Your Will gives your executors broad administrative and investment powers.

C. *Executors (Article IX)*

You designate Debra, Barry Cohen, John Hannan and Richard Ressler as co-executors. If any two of them cannot act, you designate Anthony Ressler as executor in their places.

Debra will not be entitled to compensation for her services as executor. Each other executor will be entitled to commissions equal to the lesser of the legally allowable commissions at that time or \$250,000, adjusted for inflation.

III. *Your 2012 Revocable Trust Agreement*

A. *Dispositive Provisions*

1. *During Your Life (Article II)*

We do not anticipate that you will fund your Revocable Trust during your lifetime. However, if you do, article II of the Revocable Trust Agreement gives you complete control over the trust property during your life. You may direct that distributions from your Revocable Trust be made to or for the benefit of anyone (including yourself) for any reason.

If at any time you are under a disability, (i) the trustees must pay as much of the trust fund to or for the benefit of either you or Debra as the trustees determine is necessary for any of your or her health, education, support and maintenance, and (ii) the