

JUDGE SCHANZLE-HASKINS' PROSPECTIVE JUROR QUESTIONS

- 1) State your name and area of the district in which you live.
- 2) What is your occupation during the past five years? What is the address of your present employer?
- 3) Are you married? If married, what is your spouse's name and your spouse's occupation during the last five years?
- 4) Do you have children? What are their ages? What schools do they attend? If applicable, what are their occupations?

I WILL NOW ASK ALL OF YOU A SERIES OF QUESTIONS THAT ARE DIRECTED TO THE ENTIRE JURY PANEL. IF YOU HAVE AN AFFIRMATIVE ANSWER TO ANY OF THE FOLLOWING QUESTIONS, PLEASE RAISE YOUR HAND AND THE COURT WILL MAKE FURTHER INQUIRY. *(Note: If positive answer, refer to juror by name or number. Ask all prospective jurors to listen as they may be asked to answer.)*

5) This case is expected to take _____ days to try. Will that fact present a special problem to any member of the panel? This case will start on _____.

- 6) Do you know anything at all about the facts of this case?
- 7) Have you heard or read of this case before in the newspaper, radio, or in conversations with anyone?
- 8) Is there any member of the panel who has any special disability or problem that would make serving as a member of this jury difficult or impossible?
- 9) Have any of you served before as a grand juror or trial juror?
 - a) If yes, what type of service?
 - b) Have you served as a juror in a civil case?
 - c) Did anything occur in any of those cases which might influence your judgment in this case?

10) Have you, or has anyone in your immediate family, ever participated in a lawsuit as a party, or in any other capacity? If yes, please go into details. Will that experience affect your ability to be a fair and impartial juror?

11) Do any of you know any of the attorneys involved in this case?

12) Do any of you know any of the persons at the counsel tables?

13) Do you know anyone who works for _____(name of party or employer of party if applicable)?

14) Is there anyone who works for or has family or friends who work in law enforcement? (If applicable)

15) Have any of you had legal training? If yes, what type? Have you ever used that training?

16) Have you or any family member ever been convicted of a crime? Were they incarcerated? (If applicable)

17) (If one of the parties is a corporate entity.) Are you an officer, stockholder, or current or former employee of _____?

18) Do you have any bumper stickers on your car? What do they say?

19) Does anyone know any of the potential witnesses from the witness list I read earlier?

- a) If yes, which witness?
- b) How do you know them?
- c) What is your relationship to this witness?
- d) Can you still be fair and impartial?

(QUESTIONS SUBMITTED FROM PARTIES ASKED BY COURT)

The Court at this time should review the proposed voir dire questions submitted by counsel (if any), and to ask those the Court deems relevant.

20) Your function as a juror is to decide the facts of the case, and to apply the law as provided by the Court. Do you have any problem with that concept?

21) The Court will provide you with the law that you must follow even if you disagree with it. Do you have any problem with following the law even if you disagree with it?

22) You must resolve this case based upon your own independent judgment formed in your mind. Do you have any problems with basing your verdict on your own independent judgment?

23) Is there any reason you can't give your full attention to this case?

24) You must decide this case without basing your verdict on sympathy or prejudice. Is there any reason you cannot do that?

25) Is there any reason at all why you couldn't be absolutely fair to both sides in this case?

26) Knowing your own mind as only you can, is there any reason why you would not be willing to select a person like yourself to sit as a juror in this case?

27) The Plaintiff has the burden of proving his/her case by what is called "the preponderance of the evidence" which means the Plaintiff has to produce evidence, which considered in the light of all of the facts leads you to believe that what the Plaintiff claims is more likely true than not. Do you have any problem with that concept?

28) Can you think of any other matter which you should call to the Court's attention which may have some bearing on your qualifications as a juror which would prevent you from rendering a fair and impartial verdict?

29) Have you or your immediate family members or close personal friends had any experience which you think might influence you one way or the other in connection with this type of civil case?

30) Both sides start off even, and you must wait and hear both sides of the case before you make up your mind about it. Do you have any problem with that proposition?

31) Follow-up questions by attorneys.