

JOHN DOE,

Plaintiff,

vs.

Index No. 2011-1234

A.W. CHESTERTON COMPANY, et al.,

Defendants.

-

CIVIL VOIR DIRE QUESTIONNAIRE

In order to help the Court and the lawyers, please answer the following questions to the best of your ability. Allowing you, as a potential juror, to express your beliefs and experiences is the best way to make sure that everyone involved in this lawsuit is treated fairly. Many of the questions in the questionnaire will give you the opportunity to express your beliefs and experiences in private. YOUR ANSWERS ARE CONFIDENTIAL AND WILL ONLY BE USED FOR THE PURPOSES OF SELECTING THIS JURY. Questionnaires will be seen only by the attorneys and the Judge and will be destroyed upon completion of the jury selection process. Remember you are under oath. Please write your answer clearly and firmly.

BACKGROUND INFORMATION

Name: _____

Town: _____

Gender (circle) M F Age: _____

1. What is your current job status? (Circle all that apply)

Working full-time Working Part-time Unemployed Full-time student
Disabled Homemaker Retired

2. What is your occupation and who is your employer? [If you are unemployed, retired or not currently working please list your last occupation.]

3. What other jobs have you had?

Job	Employer	Years Employed

4. What is your marital status? (Circle all that apply)

Single Divorced Married Widowed Separated
(Never Married)

5. If you are married or if you have a significant other, what is his/her occupation and who is his/her employer? [If he/she unemployed, retired or not currently working please list his/her last occupation.]

6. What other jobs has he/she had?

Job	Employer	Years Employed

7. Have you – or has anyone close to you – ever owned your own business?

Yes No

If Yes, please describe the business and whether you/they still own the business:

8. Do you have children/step-children? (Circle one)

Yes No

If yes, what are their ages and occupations (if applicable)?

Son / Daughter (circle)	Age	Occupation/Employer
Son / Daughter		
Son / Daughter		
Son / Daughter		
Son / Daughter		

9. What is the highest level of education you have completed? (Circle one)

Grade School High School Some College
Technical or Business School College Graduate Post-Graduate Work

10. If you have education beyond high school, what has been your primary area of study?

11. Have you or anyone close to you ever been a member of a union?

Yes No

If so, who and which union? _____

12. Have you or an immediate family member ever owned stock in an insurance company?

Yes No

If so, who and which company? _____

13. Have you or has anyone close to you ever worked at Eastman Kodak Company in Rochester?

Yes No

If Yes, please who the person was and the type of work they do or did at Kodak?

14. Have you or has anyone close to you ever worked in a construction trade or as a machinist or mechanic or in a large industrial complex similar to Kodak?

Yes No

If Yes, please who the person was and the type of work they do or did and where?

15. Have you or has anyone close to you suffered any personal traumatic event within the last year (i.e. injury, divorce, family separation, loss of job)?

Yes No

If Yes, please, please briefly explain the circumstances?

ASBESTOS KNOWLEDGE AND EXPERIENCE

16. Have you or a close family member ever worked around or been exposed to asbestos or any asbestos-containing products?

Yes No

17. Do you know anyone who has ever been diagnosed with an asbestos-related disease, including mesothelioma?

Yes

No

If yes, please explain who the person is and what disease they were diagnosed with:

18. Have you, or has anyone close to you, ever suffered from difficulty breathing? (Circle all that apply)

Yes, I have

Yes, someone close has

Yes, both

No

If Yes, please explain and tell us if any of those conditions are permanent:

19. Have you or a close family member ever suffered from any form of cancer?

Yes

No

If Yes, please explain who and what form of cancer and whether the treatment was successful:

EXPERIENCE WITH AND OPINIONS ABOUT LAWSUITS

20. Have you, or has anyone close to you, ever: (Check all that apply)

	SELF	FAMILY	FRIEND
a) Sued someone for money			
b) Been sued for money			
c) Been in a situation where you could have filed a lawsuit, but chose not to.			

If Yes to any of the above, please describe the situation and how it turned out.

21. Have you ever served on a jury before: (Check all that apply)

- Yes, a grand jury
- Yes, a civil trial
- Yes, a criminal trial
- No, I have been called for jury, but did not serve (SKIP to Q. 23)
- No, I have never been called for jury duty before (SKIP to Q. 23)

If Yes, how long ago did you serve? _____

If Yes, and you served more than once, how many times have you served on a jury? _____

If Yes, did you deliberate to verdict? (Circle one)

Yes No

If Yes, is there anything about that experience that would make it difficult for you to serve on this case? Please explain below.

22. Do you agree or disagree with the following statement: *Most civil lawsuits (suits seeking money damages) are frivolous.* (Check one)

- Strongly Agree
- Tend to Agree
- Tend to Disagree
- Strongly Disagree
- Neither Agree nor Disagree

Please explain: _____

23. Do you agree or disagree with the following statement: *If a person gets sick from using a product, they should be compensated regardless of whether the manufacturer knew the product could cause illness.* (Check one)

- Strongly Agree
- Tend to Agree
- Tend to Disagree
- Strongly Disagree
- Neither Agree nor Disagree

Please explain: _____

24. Some people just do not believe in civil lawsuits [suing someone or company for money damages]. What do you think about civil lawsuits in general?

25. Sometimes juries are asked to decide if money damages should be awarded for intangible damages like pain and suffering and loss of enjoyment of life. What do you think about the idea of awarding money for these kinds of damages?

Please explain how you know the person that you checked in question 28, above:

29. Do you know any of the attorneys or law firms involved in this case? (If yes, please check beside the name.)

If Yes, please explain how you know of one of the attorneys or law firms shown above:

HARDSHIPS

30. This trial could last until approximately XXX, 2011. Will you be able to serve for that period? (Circle one)

Yes No

If you answered No, please explain why not: _____

31. Is there anything else you would like to let us know about your ability to serve on the jury in this case? if so, please explain below:

32. Do you have any medical or physical condition that would make it difficult to serve on this jury? If so, please explain below:

33. Do you have any questions for the attorneys or the Court?

Thank you very much for your time answering these questions. It will save time when you arrive for jury selection.

You may NOT use any internet services, such as Google, Facebook, Twitter or any others to conduct any independent research on any topic discussed in this questionnaire, which includes the law, information about any of the issues in contention, the parties, the lawyers or the court; nor may you discuss these matters with others unless ordered by the Court to do so. Please be careful to remember these rules whenever you use a computer or other personal electronic device during the time you are serving as a juror but you are not in the courtroom.