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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

NICOLE SUMMER SMITH,  
Plaintiff,  
v.  
THE STATE OF CALIFORNIA  
DEPARTMENT OF HIGHWAY PATROL,  
Defendant.

Case No. [13-cv-01341-JD](#)

**VOIR DIRE**

United States District Court  
Northern District of California

The Court will ask these voir dire questions at the request of the parties. They are in addition to the Court's standard questions. The parties are responsible for filing a final witness list and a list of all attorneys involved in the case. The parties should file the lists with the Court by March 16, 2015, and bring sufficient copies of the lists for the jury.

**IT IS SO ORDERED.**

Dated: March 9, 2015

  
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JAMES DONATO  
United States District Judge

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**VOIR DIRE QUESTIONS**

1. Have you or anyone close to you ever worked for a lawyer or law firm?
2. Do you or anyone close to you have experience in the legal profession?
3. Have you ever had to appear in court, or in any court proceeding, as a plaintiff, defendant, victim or witness?
4. Have you or anyone close to you ever worked in any public safety, law enforcement or criminal justice system job?
5. Have you or anyone close to you worked for any other federal, state or local government agency?
6. Have you ever been involved in screening job applicants or making hiring decisions?
7. Has a job applicant ever made a complaint against you?
8. Have you ever made a complaint against a co-worker, supervisor and/or employer?
9. If you currently supervise people (or have supervised others in the past), has anyone you supervised ever made a complaint against you as a supervisor?
10. Have you ever applied for a job that required extensive background checks and physical and psychological testing?
11. Have you or anyone close to you ever made a formal claim for retaliation at work?
12. Have you or anyone close to you ever been the subject of a retaliation claim at work?
13. Have you or anyone close to you worked for the CHP?
14. Do you have any strong positive or negative feelings about the CHP?
15. Would you consider the testimony of a law enforcement witness to be less credible or more credible than the testimony of any other witness for any reason?
16. Do you think lawsuits involving employment issues are unfair or unjust and should not be brought to court?
17. Do you have any strong positive or negative feelings about awarding damages for lost wages and benefits or emotional distress?
18. Do you have any difficulty understanding or reading the English language?

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- 19. On your seats are lists of attorneys involved with this case and potential witnesses. Do you know or are you familiar with any of the attorneys?
- 20. Do you know or are you familiar with any of the potential witnesses?
- 21. Is there anything I have not asked you about that you believe could affect your ability to be a fair and impartial juror?