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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEPHEN E. EBERHARD,
Plaintiff,
v.
CALIFORNIA HIGHWAY PATROL, et al.,
Defendants.

Case No. [14-cv-01910-JD](#)

PROPOSED VOIR DIRE

Re: Dkt. No. 241

The Court proposes to ask these voir dire questions in addition to the Court's standard background questions. The parties are responsible for filing a list of potential witnesses and the attorneys involved in the case for use in voir dire. The parties should file the list with the Court by February 19, 2016, and bring at least 10 copies to jury selection on February 22, 2016.

IT IS SO ORDERED.

Dated: February 16, 2016



JAMES DONATO
United States District Judge

VOIR DIRE QUESTIONS

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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 participated in a lawsuit or appeared 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 ever worked for the California Highway Patrol?
6. Have you or anyone close to you ever worked for any other federal, state or local government agency?
7. Have you or anyone close to you ever been involved in the media or journalism?
8. Do you have any strong positive or negative feelings about the California Highway Patrol?
9. Do you have any strong positive or negative feelings about law enforcement officers in general?
10. Do you have any strong positive or negative feelings about Caltrans?
11. Do you have any strong positive or negative feelings about journalists or news reporters?
12. 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?
13. Do you think lawsuits involving civil rights claims are unfair or unjust and should not be brought to court?
14. Do you have any strong positive or negative feelings about awarding damages for violations of civil rights?
15. Do you think lawsuits involving civil rights claims against law enforcement officers are unfair or unjust and should not be brought to court?
16. Have you heard anything about the Willits Bypass Project, or read or seen any news reports about it?
17. Have you heard about this lawsuit, or read or seen any news reports about it?
18. Do you engage in social media? Which ones?

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- 19. Do you have any difficulty understanding or reading the English language?
- 20. Do you know or are you familiar with any of the potential witnesses, who are [read parties' list]?
- 21. Do you know any of the lawyers you see in court today?
- 22. Is there anything I have not asked you about that you believe could affect your ability to be a fair and impartial juror?
- 23. Is there anything you believe could prevent you from serving as a juror in this case?