

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 07-cv-00081-REB-CBS

ERICA HOFFMAN,

GARY HOFFMAN and

SANDRA HOFFMAN,  
Individually,

Plaintiffs,

v.

FORD MOTOR COMPANY, a Delaware corporation;

TRW VEHICLE SAFETY SYSTEMS INC., a Delaware  
corporation,

Defendants.

JUROR QUESTIONNAIRE

I.PERSONAL INFORMATION

1. Name: \_\_\_\_\_

Mailing Address:

Permanent Address (if different):

\_\_\_\_\_

\_\_\_\_\_

(City, State, Zip and County)

(City, State, Zip and County)

Rent or Own: \_\_\_\_\_

2. Age: \_\_\_\_\_

Date of Birth: \_\_\_\_\_

3. Gender (please circle):

Male

Female

## II. EDUCATION TRAINING AND EXPERIENCE

4. Juror's Education: (please check most appropriate)

<input type="checkbox"/> less than 6 <sup>th</sup> grade <input type="checkbox"/> more than 6 <sup>th</sup> grade <input type="checkbox"/> but no high school degree <input type="checkbox"/> high school graduate	<input type="checkbox"/> technical, business or two year degree <input type="checkbox"/> some college but no degree <input type="checkbox"/> four year college degree in <input type="checkbox"/> post graduate work or degree in
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5. Special Training or Skills: List any special training or skills you have:

6. What is your current job status? (Please check most appropriate answer)

<input type="checkbox"/> working full time	<input type="checkbox"/> unemployed	<input type="checkbox"/> homemaker
<input type="checkbox"/> working part time	<input type="checkbox"/> retired	<input type="checkbox"/> full time student

7. Do you own your own business? Yes  No

8. Do you or anyone close to you have any employment, education, training or experience in the following areas?

	Yes	No
(a) Motor vehicle manufacturing or sales	<input type="checkbox"/>	<input type="checkbox"/>
(b) Motor vehicle design or safety	<input type="checkbox"/>	<input type="checkbox"/>
(c) Motor vehicle engineering	<input type="checkbox"/>	<input type="checkbox"/>
(a) Motor vehicle accident investigation or reconstruction	<input type="checkbox"/>	<input type="checkbox"/>
(e) Statistical analysis	<input type="checkbox"/>	<input type="checkbox"/>
(f) Tire sales	<input type="checkbox"/>	<input type="checkbox"/>
(g) Product research and development	<input type="checkbox"/>	<input type="checkbox"/>
(h) Product testing	<input type="checkbox"/>	<input type="checkbox"/>
(i) Product manufacturing	<input type="checkbox"/>	<input type="checkbox"/>
(j) Product research, development or testing	<input type="checkbox"/>	<input type="checkbox"/>

Some of the questions below refer to "any member of your family." This is intended to include your mother, father, sisters, brothers, children and spouse.

9. Have you, or any member of your family, ever worked for an automobile manufacturer or distributor? Yes  No

10. Have you, or any member of your family, ever worked in designing any type of vehicle or component of any vehicle? Yes  No

**If so, please describe the work.**

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**11. Have you ever had any type of engineering training? Yes\_\_\_\_\_ No\_\_\_\_\_**

**If so, when and what type of training did you receive?**

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**12. Who is your present (or most recent) employer?**

**13. What is your present (or most recent) job title?**

**14. Describe the duties of your current (or most recent) job:**

**15. If retired, disabled, or unemployed, indicate the date of your retirement or your latest employment:**

**16. Have you ever served in the military? If yes, indicate the following:**

**branch of service:  
rank at discharge:**

**years of service:  
form of discharge:**

**17. Juror's marital status:**

\_\_\_\_\_ **single, never married**

\_\_\_\_\_ **single but previously married for \_\_\_\_\_ years**

\_\_\_\_\_ **currently married, have been for \_\_\_\_\_ years**

\_\_\_\_\_ **widow/widower**

\_\_\_\_\_ **other**

**18. If currently married, provide the following information:**

**Spouse's education:**

**Spouse's present employment status:**

**Spouse's present occupation and employer:**

Other types of jobs your spouse has held:

19. If you have children, please give their ages, gender and occupations:

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20. Other than the military, have you or any member of your family been employed by the United States government or any state or local government?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, who was so employed, when and where?

21. Have you, or any member of your family, ever worked for a law enforcement organization?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, who was so employed, when and where?

22. What are your hobbies, special interests, recreational pastimes and other spare-time activities, including sports?

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23. Do you listen to talk radio? If so, which show(s)?

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24. What is/are your primary source(s) of news?

\_\_\_\_\_ TV                      \_\_\_\_\_ Newspaper                      \_\_\_\_\_ Radio  
\_\_\_\_\_ Magazines                      \_\_\_\_\_ Other

25. What magazines and newspapers do you regularly read?

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26. Have you ever been a member of professional or job-related organization (including labor unions)?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, identify the organization(s).

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27. What social, political, civic, religious, and other organizations do you belong to or are you associated with?

28. Have you, or any member of your family, ever suffered long-term or permanent disability?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain.

29. Have you previously served on a jury? Yes \_\_\_\_\_ No \_\_\_\_\_

If so, what type of case was it? Criminal \_\_\_\_\_ Civil \_\_\_\_\_

Was a verdict reached? Yes \_\_\_\_\_ No \_\_\_\_\_

What was the verdict?

Did anything happen during your previous jury service which might affect your ability to make a decision if you are selected as a juror during this term of court?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain.

30. Have you ever been a witness in a civil or criminal trial?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain.

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31. Have you or anyone in your family ever worked for:

	Yes	No	Employer & Family Member
A lawyer or law firm	_____	_____	
An insurance company	_____	_____	
The court system	_____	_____	
A large corporation	_____	_____	
A doctor, hospital or health care organization	_____	_____	

### III.MOTOR VEHICLES

32. Have you ever owned any vehicles manufactured by Ford Motor Company?

Yes \_\_\_\_\_ No \_\_\_\_\_

Make:

Model:

Year:

33. Were you satisfied with the vehicle?

Yes \_\_\_\_\_ No \_\_\_\_\_

34. Do you currently own any vehicles manufactured by Ford Motor Company?

Yes \_\_\_\_\_ No \_\_\_\_\_

Make:

Model:

Year:

35. In your opinion, does Ford Motor Company make vehicles which are generally less safe than those made by others?

Yes \_\_\_\_\_ No \_\_\_\_\_ Don't Know \_\_\_\_\_

36. Have you, or any member of your family, ever had significant problems with a Ford vehicle?

Yes\_\_\_\_\_ No\_\_\_\_\_

Please explain why and what the experience was with the vehicle.

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**IV.DRIVING AND ACCIDENTS**

37. Do you drive? Yes\_\_\_\_\_ No\_\_\_\_\_

38. Have you ever driven a commercial truck, have any professional driving experience or training or driven as a part of your job responsibility?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, please describe:\_\_\_\_\_

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39. Have you, or any member of your family, ever been involved in a motor vehicle accident?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, please describe the accident:

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40. Have you ever lost control of a vehicle that you were driving? Yes No

If yes, please explain what caused loss of control:\_\_\_\_\_

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41. Have you, or any member of your family, ever been involved in a motor vehicle accident while the driver or passenger of a Ford vehicle?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe the vehicle:

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42. Have you ever experienced or personally witnessed the death or severe physical suffering of anyone close to you resulting from a motor vehicle accident?

Yes \_\_\_\_\_ No \_\_\_\_\_

43. Have you, or anyone you know, been injured by a defective motor vehicle?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what happened?

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44. Do you believe that a good driver can control a vehicle under almost any circumstances?

Yes \_\_\_\_\_ No \_\_\_\_\_

45. Do you wear a seatbelt?

Always \_\_\_\_\_ Never \_\_\_\_\_ Sometimes \_\_\_\_\_

46. Have you or anyone close to you ever experienced a seatbelt coming unlatched unexpectedly in an accident or otherwise?

Yes \_\_\_\_\_ No \_\_\_\_\_



**V.PRODUCT, DESIGN, SAFETY AND REGULATION**

47. Place an "X" next to the statement that most closely represents your opinion about government regulations on automobile manufacturers?

Too Strict \_\_\_\_\_ About Right \_\_\_\_\_  
Not Strict Enough \_\_\_\_\_ No Opinion \_\_\_\_\_

48. How thoroughly do you think car companies test their vehicles before selling them to the public?

Minimum testing \_\_\_\_\_ Average testing \_\_\_\_\_  
Maximum testing \_\_\_\_\_ No Opinion \_\_\_\_\_

49. In a dispute between an individual and a corporation, would you favor the:

corporation \_\_\_\_\_ individual \_\_\_\_\_ neither \_\_\_\_\_

50. Please indicate whether you agree or disagree with the following statements.

**ANSWER EACH PART (a) THROUGH (g)**

**Agree      Disagree**

a) Most large companies are run in an ethical and honest manner. (1)\_\_\_\_\_ (2)\_\_\_\_\_

Comments:

b) Most car accidents are caused by human error. (1)\_\_\_\_\_ (2)\_\_\_\_\_

Comments:

c) All too often people who cause their own problems will try to blame their problems on a corporation. (1)\_\_\_\_\_ (2)\_\_\_\_\_

Comments:

d) When I hear that an individual has filed a lawsuit

against a corporation, I usually think the corporation deserves blame and the individual deserves compensation. (1)\_\_\_\_\_ (2)\_\_\_\_\_

Comments:

e) Government regulators who are supposed to oversee corporations often put the good of the corporations above the good of the public. (1)\_\_\_\_\_ (2)\_\_\_\_\_

Comments:

f) The government should provide free health care for all citizens. (1)\_\_\_\_\_ (2)\_\_\_\_\_

Comments:

g) It would be difficult for me to deliver a jury verdict that meant an injured person would receive no money. (1)\_\_\_\_\_ (2)\_\_\_\_\_

Comments:

## VI.PRODUCTS AND PARTIES

51. When you purchase a vehicle, do you read written warnings or instructions provided with the vehicle?

Yes\_\_\_\_\_ No\_\_\_\_\_ Never Purchased a Vehicle\_\_\_\_\_

52. Have you, or any member of your family, ever been employed by Ford Motor Company, any Ford, Mercury or Lincoln dealer or had any special interest in these businesses?

Yes\_\_\_\_\_ No\_\_\_\_\_

53. Have you, or any member of your family, had any business dealings with Ford Motor Company?

Yes\_\_\_\_\_ No\_\_\_\_\_

**If yes, please describe the nature of the dealings and whether you had a favorable or unfavorable experience.**

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**54. How would you describe your feelings with regard to the government's bailout of the automotive manufacturers?**

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**55. If you have an opinion about the government bailout, please describe how your opinion would affect you views about this case.**

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**56. Do you, or does anyone close to you, prefer Ford Motor Company products over those of other vehicle manufacturers? Yes \_\_\_\_\_ No \_\_\_\_\_**

**57. Do you know, or have you heard of, the Plaintiffs to this action: Erica Hoffman, Gary Hoffman, or Sandra Hoffman?**

Yes \_\_\_\_\_ No \_\_\_\_\_

**58. Are you familiar with the Defendant TRW Vehicle Safety Systems Inc.?**

Yes \_\_\_\_\_ No \_\_\_\_\_

**If yes, please describe how you heard of TRW and what you know about the company:**

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59. Do you have a favorite NASCAR driver? If so, please state the auto manufacturer for which he/she drives.

Yes\_\_\_\_\_ No\_\_\_\_\_ Manufacturer\_\_\_\_\_

**VII.LAWSUITS**

60. Have you, or a member of your family, ever been sued?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, please describe:

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61. Have you, or a member of your family, ever filed a lawsuit?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, please describe:

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62. Have you, or a member of your family, or anyone close to you ever sued Ford Motor Company?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, identify the name of the individual who filed suit.

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63. Have you, or a member of your family, ever filed a complaint against a law enforcement officer or agency?

Yes\_\_\_\_\_ No\_\_\_\_\_

64. Have you, or a member of your family, ever been arrested or charged with a crime other than a traffic offense?

Yes\_\_\_\_\_ No\_\_\_\_\_

65. Do you believe that automobile manufacturers place a higher priority on company profit than on consumer safety?

Yes\_\_\_\_\_ No\_\_\_\_\_

66. Are you concerned that jury verdicts against corporations cause a substantial increase in the price of products we buy?

Yes \_\_\_\_\_ No \_\_\_\_\_ Maybe \_\_\_\_\_

67. Have you or any member of your family or close friends ever worked for a company that has been sued?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, please explain, including whether you thought the suits were fair or unfair:

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68. Have you, or a member of your family, read in the newspapers or magazines, heard on the radio or seen on television anything concerning lawsuits, accidents, hearings, or safety issues involving Ford Motor Company?

Yes\_\_\_\_\_ No\_\_\_\_\_

If yes, please give a brief description:

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69. If you responded yes to No. 68, has the news you've heard or read about involving these Ford products affected your opinion of Ford such that you have already made a judgment and could not be a fair and impartial juror in this case?

Yes\_\_\_\_\_ No\_\_\_\_\_

70. Do you feel that it is wrong or inappropriate to file a lawsuit to settle a dispute?

Yes\_\_\_\_\_ No\_\_\_\_\_

If Yes, please explain.

71. Do you have negative feelings toward personal injury lawyers or plaintiff's lawyers?

Yes\_\_\_\_\_ No\_\_\_\_\_

If Yes, please explain.

72. Do you feel that a company should not be required to compensate individuals injured by the company's negligence or its defective products?

Yes\_\_\_\_\_ No\_\_\_\_\_

73. Do you believe that corporations have been forced out of business because of the high cost of insurance or the fear of frivolous lawsuits?

Yes\_\_\_\_\_ No\_\_\_\_\_

If Yes, please explain.

74. If you find for the plaintiffs, do you feel that you could award money damages proved by the plaintiffs for mental and emotional suffering over and above the actual monetary damages suffered?

Yes\_\_\_\_\_ No\_\_\_\_\_

If No, please explain.

75. Do you feel there should be a cap or limit on the amount of damages any one plaintiff is awarded?

Yes\_\_\_\_\_ No\_\_\_\_\_

76. Do you feel that lawyers who bring personal injury lawsuits on behalf of injured clients are generally untrustworthy?

Yes \_\_\_\_\_ No \_\_\_\_\_

77. Have you ever been a member of an organization that supports tort reform or have you ever worked to oppose alleged frivolous lawsuits?

Yes \_\_\_\_\_ No \_\_\_\_\_

78. Do you believe that it is wrong for people to bring lawsuits for personal injury damages?

Yes \_\_\_\_\_ No \_\_\_\_\_

79. Do you believe that your insurance rates have gone up because of alleged lawsuit abuse?

Yes \_\_\_\_\_ No \_\_\_\_\_

#### VIII.HEALTHCARE AND SOCIAL ASSISTANCE

80. Do you believe that a parent or guardian should obtain necessary medical treatment for a child or dependent regardless of the cost of the treatment?

Yes \_\_\_\_\_ No \_\_\_\_\_ No opinion \_\_\_\_\_

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I declare that the above information is true to the best of my knowledge. I know that if I have willfully misrepresented a material fact on this questionnaire, I may be guilty of and punished under federal law for perjury or making a false statement.

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_