

**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;

Defendant.

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 th grade	<input type="checkbox"/>	technical, business or two year degree
<input type="checkbox"/>	more than 6 th grade	<input type="checkbox"/>	some college but no degree
	but no high school degree	<input type="checkbox"/>	four year college degree in
<input type="checkbox"/>	high school graduate	<input type="checkbox"/>	post graduate work or degree in

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	_____	_____
(b) Motor vehicle design or safety	_____	_____
(c) Motor vehicle engineering	_____	_____
(a) Motor vehicle accident investigation or reconstruction	_____	_____
(e) Statistical analysis	_____	_____
(f) Tire sales	_____	_____
(g) Product research and development	_____	_____
(h) Product testing	_____	_____
(i) Product manufacturing	_____	_____
(j) Product research, development or testing	_____	_____

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.

11. Have you ever had any type of engineering training? Yes _____ No _____

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

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:

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?

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

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

TV Newspaper Radio
 Magazines Other

25. What magazines and newspapers do you regularly read?

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

Yes _____ No _____

If yes, identify the organization(s).

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.

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

	Yes	No
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.

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: _____

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: _____

40. **Have you ever lost control of a vehicle that you were driving?** Yes _____ No _____
If yes, please explain what caused loss of control: _____

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:

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?

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.

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

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

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 TRW Vehicle Safety Systems Inc.?

Yes _____ No _____

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

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:

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

Yes _____ No _____

If yes, please describe:

63. 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.

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

Yes _____ No _____

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

Yes _____ No _____

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

Yes _____ No _____

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

Yes _____ No _____ Maybe _____

68. 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:

69. 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:

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 _____

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: _____