

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LEADER TECHNOLOGIES, INC., a Delaware corporation,)	
)	
Plaintiff-Counterdefendant,)	Civil Action No. 08-862-JJF-LPS
)	
v.)	
)	
FACEBOOK, INC., a Delaware corporation,)	
)	
Defendant-Counterclaimant.)	
)	

**PLAINTIFF LEADER TECHNOLOGIES, INC.'S
PROPOSED VOIR DIRE QUESTIONS**

OF COUNSEL:

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Leader Technologies, Inc.*

Dated: May 28, 2010

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PROPOSED VOIR DIRE QUESTIONS**

Pursuant to Local Rule 47.1, Plaintiff Leader Technologies, Inc. ("Leader") hereby submits the following proposed *voir dire* questions.

I. Proposed Voir Dire Questions

This is an action for patent infringement. The parties in this case are Leader Technologies, Inc. and Facebook, Inc. In this case, Facebook is accused of infringing one of Leader's patents.

1. This trial is expected to last approximately 7 business days. Does the length of the trial present any special problem to any member of the panel?
2. Have you heard or read anything about this case?
3. Have you or any member of your immediate family ever had a personal or business relationship of any kind with either of these companies?
4. Do you have any opinions about a party in this case that would affect your ability to be a fair and impartial juror?
5. Do you have a user account for the Facebook website?

- 5(a). If you do have a Facebook account, how often do you login to the Facebook website?
6. Do you hold any opinions about the Facebook or the Facebook website that might keep you from being a fair and impartial juror?
7. Do you own stock or have any financial interest in any of the parties?
8. King & Spalding LLP and Potter Anderson & Corroon LLP are counsel for Leader in this case. Their attorneys include:
- A. Philip A. Rovner
 - B. Paul J. Andre
 - C. Lisa Kobialka
 - D. James Hannah
 - E. Sean Boyle
 - F. Shane Glynn
 - G. Kristopher Kastens
 - H. Michael Lee
 - I. Yuridia Caire

Do you or any member of your immediate family know any of these attorneys involved in this case, or have you or any member of your immediate family had any relationship with or been employed by any of them or their law firms?

9. Blank Rome LLP and Cooley Godward Kronish LLP represent Facebook in this case. Their attorneys include:
- A. Steven L. Caponi
 - B. Heidi Keefe
 - C. Mark J. Weinstein

- D. Jeffrey Norberg
- E. Melissa Keyes
- F. Elizabeth Stameshkin
- G. Craig W. Clark
- H. Michael G. Rhodes
- I. Adam Pivovar

Do you or any member of your immediate family know any of these attorneys involved in this case, or have you or any member of your immediate family had any relationship with or been employed by any of them or their law firms?

- 10. Have you or anyone in your immediate family ever participated in a lawsuit?
- 11. Do you have any reservations about serving on the jury in a case that will involve issues related to computer software or social networking?
- 12. Have you had any experience, either personal or through business, involving inventions or patents?
- 13. Do you believe companies frequently try to infringe or violate one another's patent rights?
- 14. Have you or any member of your immediate family ever been employed by the United States Patent and Trademark Office?
- 15. Do you hold any opinions about the United States Patent and Trademark Office that might keep you from being a fair and impartial juror?
- 16. Do you have any opinions about the relationship between patents and the public interest that might keep you from being a fair and impartial juror?
- 17. Do you know or are you familiar with any of the following prospective witnesses?
 - A. Giovanni Vigna
 - B. James Herbsleb

C. Russell Parr
D. Michael McKibben
E. Jeffrey Lamb
F. Timothy Fathbrucker
G. James Sobwick
H. Andrew Bosworth
I. Daniel Chai
J. Christopher Cox
K. Adam D'Angelo
L. Aaron Greenspan
M. Ciporra Herman
N. Dustin Moskovitz
O. Dan Rose
P. Ruchi Sanghvi
Q. James Wang
R. Josh Wiseman
S. Mark Zuckerberg
T. Karel Baloun
U. Stephen D. Haggerty
V. Thyagaraja S. Ramakrishan
W. Christopher Bokhart
X. Saul Greenberg
Y. Michael Kearns
Z. James Hughes
AA. Michael Ackrell

BB. Lloyd Stephen Boord
CC. Sol Saad
DD. Ryan Strong
EE. Jonathan Piurko
FF. David Tierney
GG. Keith Voigts
HH. Riad Yammine
II. Steven Hanna
JJ. Elizabeth Foote Demarchi
KK. Eric Rosenberg
LL. Eric D. Jorgenson
MM. Christopher K. Hess
NN. J. Paul Dourish
OO. Laurence Hubert
PP. Michel Gastado
QQ. Ronald M. Swartz
RR. Jeffrey L. Winkler
SS. Evelyn A. Janos
TT. Igor Markidan
UU. Qun Dou
VV. L. Michael Maritzen
WW. Kiyo Niwa-San
XX. Harold Aaron Ludtke
YY. John Harrop
ZZ. David Washburn

AAA. Kimberly J. Felix

BBB. Michael Berman

CCC. Scott Moule

DDD. Michael Solondz

EEE. Benjamin Zacks

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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on May 28, 2010, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY CM-ECF, HAND DELIVERY AND E-MAIL

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I hereby certify that on May 28, 2010 I have sent by E-mail the foregoing document to the following non-registered participants:

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