

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

MAUREEN TOFFOLONI,)
 as Administratrix and Personal)
 Representative of the)
 ESTATE OF NANCY E. BENOIT,)
)
 Plaintiff,)
)
 v.)
)
 LFP PUBLISHING GROUP, LLC,)
 d/b/a Hustler Magazine,)
 MARK SAMANSKY, an Individual,)
 and other distributors and sellers of,)
 Hustler Magazine, as)
 Defendants X, Y, and Z,)
)
 Defendants.)

CIVIL ACTION
FILE NO. 1:08-CV-0421-TWT

PROPOSED WRITTEN VOIR DIRE QUESTIONS

COME NOW, Plaintiff, Maureen Toffoloni, as Administratrix and Personal Representative of the Estate of Nancy Benoit, and Defendant, LFP Publishing Group, LLC, d/b/a Hustler Magazine, through counsel and submit the following proposed written voir dire questions to be included with the Consolidated Pretrial Order filed with this Court on March 28, 2011.

ATTACHMENT B-3

Joint questions to be presented to Jurors in writing

The Parties request that the following questions be posed to the potential jurors in writing. The Parties also request the opportunity to ask follow-up questions of individual jurors privately.

1. Have you or anyone close to you ever had training or been employed in the pornography industry?
2. Have you or anyone close to you ever been employed by Larry Flynt Publications, or "LFP Publishing Group, LLC"?
3. Have you ever read or looked through a Hustler Magazine?
4. Have you ever purchased an issue of Hustler Magazine?
5. Do you subscribe to Hustler Magazine or purchase Hustler Magazine on a regular basis?
6. Do you subscribe to Playboy Magazine or purchase Playboy Magazine on a regular basis?
7. Do you subscribe to Penthouse Magazine or read Penthouse Magazine?

8. Do you now or have you ever subscribed to any adult or pornographic magazine or purchased any pornographic magazine on a regular basis? Do you look at pornography on the internet?
9. Have you ever watched an R-rated movie containing sexually explicit material?
 - a. If "YES", how often have you watched such movies?
10. Have you ever watched a so-called X-rated or pornographic film?
 - a. If "YES", how many such films have you seen?
11. Have you ever purchased or rented a X-rated video or pornographic film?
 - a. If "YES", how many such films or videos have you purchased in the last 10 years?
12. Do you now or have you ever had a subscription to a cable, satellite or other for-pay television channel offering adult/pornographic programming?
 - a. If "YES", to which channels do you subscribe and for how long have you had each subscription?

Respectfully submitted April 20, 2011.

166 Anderson Street, S.E.
Suite 210
Marietta, Georgia 30060
(404) 588-2530

/s/ Richard P. Decker
RICHARD P. DECKER
State Bar of Georgia #215600

For HALLMAN & WINGATE, LLC
Attorneys for Plaintiff

303 Peachtree Street, N.E.
Suite 5300
Atlanta, Georgia 30308
(404) 527-4000

/s/ S. Derek Bauer
S. DEREK BAUER
State Bar of Georgia #042537
DARRELL J. SOLOMON
State Bar of Georgia #305922

For MCKENNA, LONG & ALDRIDGE
Attorneys for Defendant