

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Baltimore Division

ALBERT SNYDER,	:	
	:	
Plaintiff	:	Civ. No. 1:06-cv-01389-RDB
	:	
v.	:	
	:	
FRED PHELPS, et al,	:	
	:	
Defendant.	:	

**DEFENDANTS' OBJECTIONS TO PLAINTIFF'S PROPOSED QUESTIONS FOR
JURY QUESTIONNAIRE**

Defendants Fred W. Phelps, Sr., and Westboro Baptist Church (collectively, Defendants), hereby object as follows to the jury questionnaire questions proposed by Plaintiff:

Defendant object to all Plaintiff's questions for circumventing the purpose of a jury questionnaire in this civil action, which is to enable the parties to obtain information about the *venire* panel that would not be sufficiently possible merely through judge-directed jury selection.

Defendants welcome and re-request having full or partial (*e.g.*, if only for ten minutes) lawyer-conducted jury *voir dire*, which the Court rejected during a previous phone conference with the Court. However, to the extent that questions posed to the *venire* panel are going to carry the Court's imprimatur, rather than being presented directly by opposing counsel, then jury questionnaire questions should not be of the argumentative type proposed by Plaintiff that do little to nothing to provide information to the parties to assist in streamlining and

supplementing the *voir dire* process.

To the extent that the Court keeps any of Plaintiff's proposed jury questionnaire questions, Defendants respectfully request that the jury questionnaire clearly designate which questions were submitted by the Defendants, which were submitted by the *pro se* defendants, and which were presented by Plaintiff.

Respectfully submitted,

MARKS & KATZ, LLC

____/s/_____
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Attorneys for Defendants Fred W.
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by the CM/ECF filing system on September 18, 2007, to:

Sean E. Summers, Esq.
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