

## Defendants' Voir Dire

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

THE WEATHER UNDERGROUND, INC.,  
a Michigan corporation,

Plaintiff,

vs.

Case No. 2:09-CV-10756  
Hon. Marianne O. Battani

NAVIGATION CATALYST SYSTEMS, INC.,  
a Delaware corporation; CONNEXUS CORP.,  
a Delaware corporation; FIRSTLOOK, INC.,  
a Delaware corporation; and EPIC MEDIA  
GROUP, INC., a Delaware corporation,

Defendants.

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**DEFENDANTS' PROPOSED VOIR DIRE**

For their proposed *voir dire* of the jurors in this matter, Defendants Connexus Corporation, Firstlook, Inc., and Navigation Catalyst Systems, Inc. respectfully request that the Court inquire as follows:

1. Is there anyone who has personally been involved in a lawsuit before, either as a plaintiff or defendant?
  - a. (If there is a yes), Please tell us what the lawsuit(s) was/(were) about and whether you were a plaintiff or defendant?
2. Do any of you participate in social media like Facebook, LinkedIn, or MySpace?
  - a. (If there is a yes), Please tell us the social media platforms you participate in.
3. Is anyone the owner of a U.S. trademark registration?
  - a. (If there is a yes), Please tell us for what purpose you use your trademark.
4. Is there anyone who does not regularly use the Internet either at work or at home?
5. Is anyone the owner of an Internet domain name?
  - a. (If there is a yes), For those of you who are owners of a domain name, for what purposes do you use your domain names?
6. Has anyone ever heard of the term “pay-per-click advertising?”
  - a. (If there is a yes), For those of you who have heard of the phrase “pay-per-click advertising,” what is your understanding of what that means?
  - b. (If there is a yes), For those of you who have heard of the phrase “pay-per-click advertising,” have you ever used it in your workplace?
7. Has anyone ever heard of The Weather Underground?

a. (If there is a yes), For those of you who have heard of The Weather

Underground, in what context have you heard of the Weather Underground?

RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of February 2012.

*/s/William A. Delgado*

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