

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ROSETTA STONE LTD.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	<b>Civ. Action No. 1:09-cv-00736(GBL/TCB)</b>
	)	
GOOGLE INC.,	)	
	)	
Defendant.	)	

**ROSETTA STONE’S PROPOSED VOIR DIRE**

In addition to the Court’s standard inquiry, Plaintiff Rosetta Stone Ltd. respectfully requests that prospective jurors be asked the following technology and case-related questions:

1. Have you, or someone close to you, ever worked for, or applied to work for, Google or Rosetta Stone?
2. Have you ever owned stock in either Google or Rosetta Stone?
3. Have you, or someone close to you, ever had any training or experience in computer science, software development, information technology or a related field?
4. Have you, or someone close to you, ever had any training or experience in trademarks, patents, or copyrights, or in any other area of the law?
5. Have you, or someone close to you, ever worked for a company that was involved in a trademark, copyright or patent dispute?
6. Do you have a Gmail account?
7. Do you belong to any social networking sites such as Google’s Orkut, Facebook, MySpace, or Twitter?
8. Do you think that BiTorrent sites or peer to peer file sharing sites, such as eDonkey, Gnutella, Rapidshare or Usenet, should be allowed to provide free downloads of software?
9. Are you a supporter of “open-source” software?

10. Have you, or someone close to you, ever advertised or sold goods through Google?
11. Do you regularly read computer- or technology-oriented magazines?
12. Do you, or anyone in your family or any of your close friends, maintain a weblog, or blog or have a personal website?
13. Have you purchased or used Rosetta Stone language products to learn another language?
14. Have you purchased or used a brand of software other than Rosetta Stone to learn a foreign language?
15. Do you think that companies like Napster that provided free downloads of music should be allowed to do this?
16. Have you ever been involved in negotiating the terms of a legal contract?
17. Have you, or someone close to you, ever been involved in a lawsuit, either as a party or a witness?
18. Have you ever had any experience with, or do you have any connection with, any of the individuals or entities whose names I will now read to you:

Google  
LitiNomics  
NERA  
Ocean Tomo  
Rosetta Stone  
Tom Adams  
Edward Blair  
Jason Calhoun  
Terri Chen  
Daniel Dulitz  
Eric Eichmann  
Prashant Fuloria  
Baris Gultekin

Rose Hagan  
Alana Karen  
Van Leigh  
Bill Lloyd  
Corey Louie  
James Malackowski  
Nino Ninov  
Larry Page  
Nicole Tabatabai  
Kent Van Liere  
Michael Wagner  
Susan Wojcicki  
Michael Wu

April 26, 2010

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Of Counsel:

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*(Pro hac vice)*

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Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2010 I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system which will then send a notification of such filing (NEF) to the following:

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*Counsel for Defendant, Google Inc.*

\_\_\_\_\_  
April 26, 2010

Date

\_\_\_\_\_  
/s/

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