

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ROSETTA STONE LTD.

Plaintiff,

v.

GOOGLE INC.

Defendant.

CIVIL ACTION NO. 1:09cv736
(GBL / TCB)

DEFENDANT GOOGLE INC.'S PROPOSED JURY VOIR DIRE

Defendant Google Inc. ("Google"), pursuant to Local Rule 51, hereby submits its proposed jury voir dire questions.

1. Please state your full name.
2. What city and county do you live in?
3. What is the name of your current employer (if not currently employed, who was your most recent employer)?
What is your job title and what are your responsibilities? (If not currently employed, what was your title and what did you do on your most recent job)?
How long have you been employed with your most recent employer? (If not currently employed, how long did you work for your most recent employer)?
4. Please state the occupation/employer of any other people you live with:
5. What one source of news do you follow most?
6. Have you ever used a language-learning software?
IF YES, which one?
IF YES, were you satisfied with it?
7. Have you used any Google products or services? Which ones?
8. How often do you use the Internet? (e.g., Multiple times per day, once a day, less than once a day, never)
9. How often do you shop online? (e.g., once a week, once a month, several times a year, rarely, never)
10. Do you have any opinions about the company Rosetta Stone?
11. Would your opinions, either positive or negative, interfere with your ability to be fair and impartial in this action?
12. Have you, or anyone you know, ever worked for Rosetta Stone?
IF YES, Please explain.
13. Do you, a family member or close friend, currently own or have you/they previously owned, stock in Rosetta Stone?
IF YES, Please explain relationship.
14. Have you, or anyone you know, ever worked for Google?
IF YES, Please explain.
15. Do you, a family member or close friend, currently own or have you/they previously owned, stock in Google?
IF YES, please explain relationship.

16. Do you have any opinions about Google?
17. Would your opinions, either positive or negative, interfere with your ability to be fair and impartial in this action?
18. Do you know any other person called for jury duty this week?
IF YES, Please describe who you know and the nature of the relationship:
19. Attached is a list of law firms representing the parties in this case, attorneys in this case, and persons who are potential witnesses in this case. If you know, or think you know, any of the persons listed please check the space next to their name. In the space provided, please explain how you know them.
20. Is there anything else you think the Court and parties in this dispute should know about you that would affect your ability to be a fair and impartial juror?
IF YES, Please describe.

Respectfully Submitted,

GOOGLE INC.
By counsel

/s/

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CERTIFICATE OF SERVICE

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

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