

## VOIR DIRE

1. I'm going to ask all of you questions concerning your general qualifications to serve as jurors.
2. I will address these questions to you as a whole. If any of you feel an answer is required, raise your hand and the court officer will bring you up to discuss, don't hesitate to speak up.
  - a. Citizens of Louisiana and Western District of Louisiana for at least one year
  - b. Able to read, write and understand the English language
  - c. Over the age of 70
  - d. Mentally and physically competent - pronounced incapable of handling affairs by court of competent jurisdiction
  - e. Criminal charges pending against any of you in this court or any other court
  - f. Convicted of a felony:  
State - punishable by imprisonment at Angola  
Federal - punishable by more than one year in prison or fine of more than \$1,000.00
  - g. Venire is now generally qualified
3. I want each member of the panel to know how greatly the court appreciates your individual sacrifice to come here today as prospective jurors. I hope you will not view your role as inconsequential. The fact is it is terribly important work. The United States Constitution guarantees in a case, such as fixed today, trial by jury comprised of \_\_\_\_ qualified, unbiased citizens. If we were unable to obtain juries across this land and in United States possessions, the government simply could not function under our Constitution and justice would be denied to litigants in this county. We are now ready to pick a jury.
4. I ask each of you to give your name, address and occupation, if married, employment of spouse, children and what they do.
5. Have you ever served on a jury before?

6. Do any of you know each other?
7. Ladies and Gentlemen, the parties are entitled to a fair and impartial jury and I will now ask you certain questions touching on this issue.
8. If any of you should answer any of the following questions "Yes" please raise your hand and, state your number and name.
9. The plaintiff(s) in this case (is) (are) \_\_\_\_\_, who live(s) in \_\_\_\_\_.  
(Please rise Mr. \_\_\_\_\_). If any of you are acquainted with the plaintiff(s), please say so.
10. The defendant(s) in this case (is) (are) \_\_\_\_\_.  
If you know the defendant(s) or have any connection with any of the defendant(s)' companies or their stockholders, managers or employees, please say so.
11. Have you ever been employed by either the plaintiff or the defendant or has any member of your immediate family been employed by the plaintiff or defendant or has any member of your immediate family had a relationship or business connection with the plaintiff or defendant?
12. (If any party is a corporation) - Are you an officer, director, stockholder or employee of \_\_\_\_\_  
\_\_\_\_\_
13. Do you own any stock or bonds in any of the defendant companies or do you have any financial interest in them?
14. Request counsel to rise and identify themselves.
15. Do you know or are you related by blood or marriage to counsel for any party in this litigation?
16. Have any of the counsel in this case or any members of their firm acted as your attorney in any legal matter or the attorney for any member of your immediate family to your

knowledge?

17. In connection with your employment, do you have anything to do with the adjustment of claims or the settlement of claims for damages? Does any member of your immediate family have anything to do with the adjustment of or settlement of claims?
18. Have you or any member of your family ever had a claim against anyone for damages, or has such a claim been asserted against you or your family? (ask each juror that responds individually) If so, what kind of claim? What did it involve? Would that fact influence you in any way in reaching a fair and impartial verdict in this case?
19. List of Potential Witnesses - ask counsel to read their lists. Do you know any of the people whose names were just read out by counsel?
20. Statement of Facts Regarding This Case: This case involves \_\_\_\_\_  
\_\_\_\_\_
21. Do you of your own knowledge have any information about the facts of this case?
22. Have you any opinion whatsoever about this case?
23. Have you read anything about this matter coming up for trial or have you heard any discussions concerning it?
24. Has anyone talked to you about the case?
25. If you were one of the parties in this case, do you know of any reason why you would not be content to have the case tried by someone in your frame of mind?
26. If you are selected to sit as a juror in this case, will you be unable or unwilling to render a verdict solely on the evidence presented at the trial and the law as I give it to you in my instructions, disregarding any other ideas, notions or belief about the law you may have encountered in reaching your verdict?

27. Individuals and corporations are entitled to equal treatment under the law - is there any reasons that you can't treat these individual plaintiffs on the one hand and the corporate defendant on the other, as equals?
28. If the damages justify it, would anything prevent you from making a substantial award?  
Would anything prevent you from making a low award or no award?
29. We all know that sympathy is an admirable quality and if the court instructs you that it has no place in this courtroom and in the trial, do you think that you can keep these qualities out of your deliberation?
30. Have any of you had any \_\_\_\_\_ injuries in the past?
31. Would you be unable or unwilling to firmly put aside any feelings or sympathy or compassion for plaintiff(s) or defendant(s) and decide this case solely on its merits and according to the law as I will explain it to you?
32. Do you know of any reason why you think that you could not sit in this case and render a just, fair, honest and impartial verdict?
33. This case will last for \_\_\_\_\_ days. Is there any reason why you will be unable to serve for such a period of time as is necessary to complete this case?
34. Has anyone been contacted about this case or by anyone concerning this case other than the written summons?
35. Does anyone have anything else on their mind which would affect your ability to serve on this jury, and which was not covered by the questions previously asked? If so, please raise your hand.
36. Does anyone have any medical or physical condition that could affect your ability to serve on this jury?