

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

BERKLEY INSURANCE CO., et al.,

Plaintiffs,

v.

THE FEDERAL HOUSING FINANCE
AGENCY, et al.,

Defendants.

Case No. 1:13-cv-1053-RCL

IN RE FANNIE MAE/FREDDIE MAC
SENIOR PREFERRED STOCK
PURCHASE AGREEMENT CLASS
ACTION LITIGATIONS

Case No. 1:13-mc-1288-RCL

This document relates to:
ALL CASES

JOINT MOTION TO ISSUE JURY QUESTIONNAIRE IN ADVANCE OF VOIR DIRE

Plaintiffs and Defendants jointly request that the Court order that the jury questionnaire attached as Exhibit A (the “Questionnaire”) be disseminated to potential jurors who are being summoned to report for potential service as jurors in this matter. The Parties further request that the Court order that potential jurors be told to complete the Questionnaire and return it pursuant to the jury office procedures at least one week prior to reporting for jury service on October 17, 2022. All Parties believe that this process will help to streamline the jury selection process by having jurors provide information prior to their arrival in Court that the Parties consider pertinent to the jury selection process.

As jury summonses are likely being issued shortly, the Parties jointly request that this Motion be granted expeditiously so that the Questionnaire can be included in communications with potential jurors and received by the Court and the Parties at least one week before trial.

The Parties are available to answer any questions that the Court may have.

Dated: August 30, 2022

Respectfully submitted,

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Exhibit “A”

TRIAL JUROR QUESTIONNAIRE

You shall not blog, Tweet, use Google, or use any other search engine or the Internet to obtain or share information about the parties, attorneys or subject matter involved in the case while serving as a potential juror or if selected to serve as a juror.

1. Name: (first) _____ (middle) _____ (last) _____
2. Date of Birth: (month) _____ (date) _____ (year) _____
3. How long have you lived in Washington, D.C.? _____
4. Where were you raised? _____
5. Do you own or rent your residence? own rent live with friends live with relatives other
6. Marital Status: married single living with partner divorced/separated widow/widower
7. What is your current employment status (check all that apply)? employed full-time employed part-time business owner homemaker self-employed unemployed retired in _____ (year) full-time student disabled, do not work work more than one job laid off do not work outside the home other (please specify): _____
8. Please list your last 3 jobs and employers during your employment career?

Employer	Dates	Job Title

9. What is the occupation, job title, and employer of your spouse, partner or significant other (if any)? If he/she is unemployed or retired, please list his/her last job: _____
10. What do you like to do in your spare time? _____
11. Have you ever had the responsibility to hire or fire employees? yes no
12. Have you ever worked for a large corporation? yes no

If yes, please list the corporation, the dates of employment, and your job title:

Corporation	Dates	Job Title

13. Do you have any opinions, positive or negative, about the influence of corporations on the US economy? yes no
14. Have you ever worked for a federal, state, or local government? yes no

If yes, please list the government agency, the dates of employment, and your job title:

Agency	Dates	Job Title

15. Have you ever worked for a government contractor? yes no

If yes, please list the agency, the dates of employment, and your job title:

Agency	Dates	Job Title

16. Do you have any strong feelings or beliefs about the government in general, any particular government agency, or government officials that might make it difficult for you to serve as a fair or impartial juror in this case? yes no

17. Do you believe government officials generally try their best to serve the public interest? yes no unsure

18. Describe your educational background, including degrees obtained, if any, and area of study and school:

Less than High School High School or GED Some college or technical school AA or technical school 4-year college Some graduate school Graduate degree

Degrees Obtained	School or College Attended	Area of Study

19. Have you ever been in the military? yes no If yes, please indicate:

Branch	Years	Rank

What type of discharge? honorable general medical other than honorable other

20. With what social, civil, volunteer, professional, trade, labor union, or other organizations are you affiliated?

Organization	Years	Position (member or leader & title)

21. Have you ever been involved in a civil legal dispute? yes, as a plaintiff yes, as a defendant yes, as a witness yes, other no

22. Please indicate your agreement with the statement: "I believe that people generally get what they deserve." strongly agree somewhat agree neutral somewhat disagree strongly disagree

23. Do you have any views about expert witnesses either in general or in particular areas? yes no

24. Do you have any strong feelings or beliefs about lawsuits in general? yes no

25. What is your impression of class action lawsuits, the parties to such lawsuits (whether plaintiffs or defendants), or their lawyers? very positive positive neutral negative very negative

26. Have you or someone close to you ever been a victim of what you considered to be fraud or any other type of wrongdoing in the securities, real estate, or financial industries? yes no

27. Have you ever served on a jury before? yes no

If yes, how many of each: civil case (s) criminal case (s) unsure

If yes, did you ever serve as a foreperson or presiding juror? yes no

If yes, have you ever served on a jury that failed to reach a verdict? yes no

28. Have you or anyone you know, had a foreclosure on their residence? yes, me yes, another no

If yes, was that foreclosure(s) a result of the 2008 financial crisis? yes no unsure n/a

29. Do you currently have a mortgage on your primary residence? yes no unsure n/a

If yes, do you know which company(s) holds your mortgage? yes no unsure

If yes, do you know your interest rate and duration of your mortgage? yes no unsure

30. Have you ever refinanced a home loan/mortgage? yes no unsure

31. Have you ever been self-employed? yes, currently yes, in the past no

32. Have you, or anyone who lives with you, ever had any educational or job-related training or paid work experience, volunteer experience, or any other relevant experience in any of the following fields (check all that apply):

Banking	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Economics	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Finance	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Investments	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Legal Contracts	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Litigation	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Loans	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Real Estate	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Statistics	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Tax Preparation	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No
Underwriting	<input type="checkbox"/> Yes, Self	<input type="checkbox"/> Yes, household member	<input type="checkbox"/> No

33. Were you and/or your family negatively impacted by the 2008 financial crisis? yes no

If yes, is it still currently impacting your/their life? yes no unsure

34. Did you and/or any family members receive government assistance during the 2008 financial crisis?

yes no unsure

35. Do you have any views on the causes of the 2008 financial crisis? yes no

36. Have you or someone close to you ever gained or lost a significant amount of money in the stock market or in real estate? yes no

37. Do you believe that investing in the stock market (and other securities) is like gambling? yes no

38. Have you, a relative, or a close friend ever been involved in a conservatorship of any kind? yes no
39. How would you describe your political views? very liberal somewhat liberal moderate
somewhat conservative very conservative other: _____
40. Do you consider yourself to be knowledgeable about investing and finance? yes somewhat no
41. Have you ever taken out a federal loan of any kind? yes no
42. Do you regularly follow business and market events on TV, internet, or radio? yes no
If yes, is that daily or less than every day? daily less than every day
43. How would you rate your level of financial risk-taking: aggressive moderate conservative
44. Do you have money invested in the financial markets, such as stocks or bonds? yes no
If yes, how important are dividends to you? very somewhat not important unsure
If yes, how important is the price of stocks? very somewhat not important unsure
If yes, how do you approach your investments? conservatively moderately aggressively?
45. What role do you think the government should have to regulate the US financial markets?
it should do more it is currently doing enough it should do less
46. What is your opinion about the current financial condition of the US economy?
very good good fair poor very poor unsure
47. The Federal Housing Finance Agency (FHFA), Federal National Mortgage Association (Fannie Mae), and Federal Home Loan Mortgage Corporation (Freddie Mac) are parties in this lawsuit.
Have you ever had any dealings with the FHFA, Fannie Mae, or Freddie Mac? yes no unsure
Do you have any opinions about the FHFA, Fannie Mae, or Freddie Mac? yes no
48. Have you formed any opinions about this case or the parties mentioned, as a result of completing this questionnaire? yes no
49. Is there anything else that you think the Court or the attorneys should know? yes no