## UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

Case No. 1:13-cv-1053-RCL	
Case No. 1:13-mc-1288-RCL	

## JOINT PROPOSED VOIR DIRE QUESTIONS

- Are you personally acquainted with, or to your knowledge is any member of your family or any close friend of yours acquainted with any of the parties or lawyers in this case, or any of their spouses, parents, or children? (PARTIES TO PROVIDE LIST TO COURT)
- Are you personally acquainted with, or to your knowledge is any member of your family or any close friend of yours acquainted with any of the witnesses in this case, or any of their spouses, parents, or children? (PARTIES TO PROVIDE LIST TO COURT)
- 3. Do any of you know any of the other potential jurors? That is, do any of you know each other, other than through jury service?
- 4. Have you or someone close to you ever worked for any government agency or a government contractor?a. [describe]
- 5. Do 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?

- 6. Do you believe government officials generally try their best to serve the public interest?
- 7. Would you tend to believe witnesses who are current or former government employees over non-government employees?
- 8. Do you have any views about expert witnesses either in general or in particular areas?
- Have you or a close family member ever worked for a large corporation?
  a. [describe]
- 10. Do you have any opinions, positive or negative, about the influence of large corporations on the US economy?
  - a. [describe]
- 11. Have you ever owned your own business?
  - a. What is/was the nature of the business?
  - b. Do you currently own your own business?
  - c. Is/was that business your sole source of income?
- 12. Do you now or have you in the past invested in the financial/stock market?
  - a. If yes, is that through an advisor or do you make decisions for yourself?
  - b. How active of an investor would you consider yourself to be?
  - c. What is your education or training that enables you to make decisions about investments?
  - d. How important are/were dividends to you when making investment decisions about stocks?
  - e. Have you ever traded in cryptocurrency or wanted to?
  - f. Do you agree that investing in the stock market is like gambling?
- 13. Have you or someone close to you ever gained or lost a significant amount of money in the stock market or in real estate?
- 14. Have you or someone close to you ever been a victim of fraud or any other type of wrongdoing in the securities, real estate, or financial industries?
- 15. Do you have any views on the causes of the 2008 financial crisis?
- 16. Do you have any strong views about corporations that accepted Federal bailout funds to stay afloat during the financial downturn in 2008?
- 17. Have you ever had any financial or mortgage dealings with Freddie Mac or Fannie Mae?
  - a. When was that?
  - b. As a result of those interactions, do you have any views about either of the enterprises?

- 18. Are you familiar with the term "Government Sponsored Entity"?
  - a. How are you familiar with the term?
  - b. Do you have any strong views about the legitimacy or viability of such an entity?
- 19. Do you have any personal experience with or are you familiar with "Conservatorship"?a. What is your experience or knowledge of Conservatorship based upon?
- 20. Have you or someone close to you had any experience in the following fields: banking, finance, economics, securities, underwriting, and real estate?
- 21. Do you own or rent your home?
  - a. If you own your home do you have a mortgage?
- 22. Have you or someone close to you experienced a foreclosure?
- 23. Have you ever been a party in a civil lawsuit?
  - a. What was the nature of the lawsuit(s)?
  - b. Were you a plaintiff or defendant?
  - c. Was the lawsuit resolved to your satisfaction?
- 24. Have you ever served on a jury?
  - a. What was the nature of the case(s), civil or criminal?
  - b. Did you adopt a leadership position on the jury?
  - b. Were you ever a foreperson?
  - c. If yes, were you appointed by the court, nominated by other jurors or did you volunteer?
  - d. Did the jury reach a verdict?
- 25. Have you ever been involved in a civil legal dispute as a party or a witness?
  - a. In what capacity were you involved in a civil legal dispute?
  - b. How did the case resolve?
  - c. Was this a positive or negative experience in your life?
- 26. What is your impression of class action lawsuits, the parties to such lawsuits (whether plaintiffs or defendants), or their lawyers?
- 27. Have you ever served in the military?
  - a. When?
  - b. What branch?
  - c. What was your rank and discharge?
- 28. Do you belong to any social or professional organizations?
  - a. To what organizations have you belonged?
  - b. Do you or have you had a leadership role in any?

- 29. Do you have a medical reason or a personal hardship that would make it difficult to serve as a juror in this case?
- 30. Do you have any other information that you feel would be important to share that would impact your ability to serve as a juror in this case?

Dated: October 11, 2022

## /s/ Charles J. Cooper

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