

CAUSE NO. \_\_\_\_\_

IN THE COUNTY COURT

AT LAW \_\_\_\_\_

SMITH COUNTY, TEXAS

VS.

PLAINTIFF=S REQUESTED JURY QUESTIONNAIRE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff(s) , and submits this PLAINTIFFS= REQUESTED JURY QUESTIONNAIRE, and pursuant thereto would respectfully show the Court as follows:

I.

Plaintiffs hereby request that the group of potential jurors selected in connection with this matter be instructed to answer the attached questionnaire prior to the voir dire examination of said group. The completion of the attached questionnaire will eliminate many voir dire questions, reduce the time needed for voir dire, and increase the probability of obtaining a fair and impartial jury.

II.

This motion is made not for the purposes of delay but in the interest of justice.

RESPECTFULLY SUBMITTED,

\_\_\_\_\_  
Earl Drott  
State Bar Number 06134750

EARL DROTT, P.C.  
Bank of America Southeast Center  
3301 Golden Road, Suite 411  
Tyler, Texas 75701  
Phone (903) 531-9301  
Fax (903) 531-0221

Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded to \_\_\_\_\_, attorney for \_\_\_\_\_, by \_\_\_\_\_, on this the \_\_\_\_ day of \_\_\_\_\_, 19\_\_.

\_\_\_\_\_

**JURY QUESTIONNAIRE**

1. Name: \_\_\_\_\_ Age: \_\_\_\_\_ Years lived in  
East Texas: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Occupation (former occupation if  
retired): \_\_\_\_\_

If you are self-employed, please state the nature of your  
vocation: \_\_\_\_\_

2. Spouse=s name: \_\_\_\_\_ Spouse=s age: \_\_\_\_\_

Spouse=s occupation (former occupation if  
retired): \_\_\_\_\_

If spouse is self-employed, please state the nature of his/her  
vocation: \_\_\_\_\_

3. Number of children: \_\_\_\_\_

4. Religious  
preference: \_\_\_\_\_  
\_\_\_\_\_

5. Are you a member of any social or political organization: Yes \_\_\_\_\_  
No \_\_\_\_\_

If yes, please list each organization: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Have you ever been a party to a lawsuit? Yes \_\_\_\_\_ No \_\_\_\_\_

If so, were you the Plaintiff or Defendant (circle one): Plaintiff  
Defendant

Type of  
lawsuit: \_\_\_\_\_  
\_\_\_\_\_

Result of  
lawsuit: \_\_\_\_\_  
\_\_\_\_\_

7. Have you ever made a claim for personal injury damages? Yes \_\_\_\_\_  
No \_\_\_\_\_

8. Are you a member of a social or political organization that is opposed to personal  
injury lawsuits? Yes \_\_\_\_\_  
No \_\_\_\_\_

If so, please state the name of the  
organization: \_\_\_\_\_

9. Have you or any member of your family ever worked in the claims industry?  
Yes \_\_\_\_\_  
No \_\_\_\_\_

If yes, please state: a. the relationship of the family member who worked  
in the claims industry (father, mother, brother, spouse, son,  
etc.): \_\_\_\_\_  
\_\_\_\_\_

b. company worked  
for: \_\_\_\_\_

c. job  
title: \_\_\_\_\_

10. What is your opinion of plaintiff=s lawyers in  
general? \_\_\_\_\_

11. What is your opinion of defense lawyers in general  
? \_\_\_\_\_

12. Are you opposed to awarding money damages for pain and suffering?  
Yes \_\_\_\_\_  
No \_\_\_\_\_

13. If you were injured by someone else=s negligence would you file a lawsuit if  
necessary?  
Yes \_\_\_\_\_  
No \_\_\_\_\_