

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

[PLAINTIFF],

Plaintiff,

v.

[DEFENDANT],

Defendant.

C.A. No. 00-0000-XXX

Revised 3/28/2022

STANDARD VOIR DIRE [PATENT]

1. *Judge will read a brief description of the case.*

Is any member of the panel familiar with the case or has any member of the panel heard or read anything about it?

2. *Judge will ask counsel to introduce themselves.*

Have you or any member of your family had any business dealings with any of the attorneys or their law firms?

3. *Judge will ask counsel to introduce the parties and their predecessors in interest.*

Do you know any of the parties or any of the following companies

4. *Judge will ask counsel to name any witnesses they expect to call.*

Do you know any of the witnesses that counsel just mentioned?

5. If you are selected to sit on this case, will you be able to render a verdict solely on the evidence presented at the trial and in the context of the law as I will give it to you in my instructions, disregarding any other ideas, notions, or beliefs about the law that you may have in reaching your verdict?

6. Do you have any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury?

7. On most days, jurors will be expected to sit from 9:00 a.m. until 4:30 p.m. There will

be a one-hour lunch break and a 15 minute break in the morning and afternoon. This case is expected to take ___ days to try so that we expect the testimony in the trial will be completed by _____. Is there any member of the panel who would be unable to sit as a juror in the case for that period of time?

8. Have you, a relative or close friend had any experience with patents, patent law, patented technology, trade secrets or the United States Patent and Trademark Office?

9. Do you or does your employer rely on patented technology or trade secret information as part of its business?

10. Do you have any beliefs or feelings concerning patents, and the efforts to enforce patents that might make you biased or prejudiced for or against the enforcement of patents?

11. Are you opposed to a company/individual paying a damage award if it infringes a patent?

12. Are you opposed to a company/individual receiving a damage award if it proves infringement of a patent?

13. Have you or any close family member had any legal education or training?

14. Have you ever served as a juror before?

15. Have you or any close family member ever sued or been sued?

16. Have you ever given testimony in a civil lawsuit or have you ever testified in a deposition, courtroom or hearing?

Voir Dire as submitted by the parties

Limited to eight (8) questions from each side. The questions should be designed to ***elicit a yes or no answer***.

____. **FINAL QUESTION:** Having heard the questions put to you by the court, is there any other reason as to why you could not sit on this jury and render a fair and impartial verdict based on the evidence presented to you and the context of the court's instructions to you on the law?