

The Honorable J. Kelley Arnold

CV 01-05311 #00000110

FILED \_\_\_\_\_ LODGED \_\_\_\_\_  
 RECEIVED \_\_\_\_\_  
**JAN 27 2003**  
 CLERK U.S. DISTRICT COURT  
 WESTERN DISTRICT OF WASHINGTON AT TACOMA  
 BY \_\_\_\_\_ DEPUTY

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

KENNETH L. JARAMILLO, individually and as Personal Representative of the Estates of ANGELA L. JARAMILLO and McKENNA LEE JARAMILLO; GERALD R. TARUTIS as guardian ad litem for RILEY R. JARAMILLO, a minor; and BRADFORD J. FULTON as guardian ad litem for SAWYER D. JARAMILLO a minor,

NO. C01-5311JKA

VOIR DIRE QUESTIONS

Plaintiff,

v.

FORD MOTOR COMPANY, a Delaware corporation; and DOREL INDUSTRIES, Inc., d/b/a-a/k/a COSCO HOME AND OFFICE PRODUCTS, INC., a foreign corporation,

Defendants.

Defendant Ford Motor Company respectfully requests that the court ask the following general questions to the jury pool in this matter.

1. Have you ever served on a jury previously?
  - If so, was it a civil case or criminal case?

VOIR DIRE QUESTIONS  
No. C01-5311JKA)- 1-

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2. Have you or any immediate family member ever been party (either as a plaintiff or defendant) in a lawsuit?

3. Have you or any immediate family member ever brought a claim asserting that a product was defective or not safe?

4. Have you, any immediate family member, or close friend ever been seriously injured in an accident due to an unsafe product?

5. Have you or any immediate family member, or close friend ever been involved in a serious automobile accident?

6. Have you or any immediate family member ever been employed by an automobile manufacturer, dealer or automobile maintenance facility or does anyone in your immediate family have any knowledge, experience, or expertise in automobile mechanics?

7. Has anyone never owned a product manufactured by Ford (including a Ford, Lincoln, Mercury, Volvo, Land Rover, or Mazda automobile or truck)?

▪ if not, is there any particular reason?

VOIR DIRE QUESTIONS  
No. C01-5311JKA)- 2-

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1           8.     Has anyone who has owned a Ford product ever had a serious problem  
2 involving the vehicle or been treated in a manner you believe was inappropriate by a  
3 Ford employee or dealer?  
4

5           9.     This case involves allegations that a Ford Explorer was not reasonably  
6 safe in its handling stability and crashworthiness. It involves a rollover accident. Have  
7 you, any member of your immediate family, or friend been involved in a rollover  
8 accident or experienced any problems with a vehicle involving stability or  
9 crashworthiness? (If so, briefly explain.)

- 10                   ▪    has anyone read or heard about this ever happening? (If so, briefly  
11                            explain.)  
12

13  
14           10.    The defendant in this case is Ford Motor Company. Has anyone read or  
15 heard anything about claims against Ford Motor Company in the press, on TV, radio or  
16 other media or from family friends?

- 17                   ▪    Has anyone sold a Ford product or not purchased a Ford product  
18                            because of this information?
- 19                   ▪    Does anyone feel that this information would prevent them from  
20                            being a fair and impartial juror in this case?  
21

22           11.    Has anyone owned a sport utility vehicle (SUV)?  
23  
24  
25

26 VOIR DIRE QUESTIONS  
No. C01-5311JKA)- 3-

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1 12. Does anyone oppose the manufacture or use of SUVs for any reason?

2  
3 13. Does anyone believe -- without hearing in any evidence in this case -- that  
4 an SUV is less safe than a passenger car taking into consideration all possible accident  
5 scenarios?

6  
7 14. There are issues in this case involving warnings and instructions. Is there  
8 anyone who does not customarily review the Owner's Manual when you purchase an  
9 automobile or other new product?

10  
11 15. Does anyone not have a driver's license or who does not regularly drive a  
12 motor vehicle?

13  
14 16. Have you or any immediate family member held a job working around  
15 equipment for which warnings or instructions were issued and supposed to be  
16 followed?  
17

18  
19 17. This case includes claims for wrongful death involving the deaths of a  
20 mother and a young daughter. Does any juror have anything in his or her personal  
21 backgrounds that would make it difficult to sit on this jury and be fair and impartial to  
22 both sides given those issues?  
23

24  
25 VOIR DIRE QUESTIONS  
26 No. C01-5311JKA)- 4-

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18 This case involves claims by individuals against a corporation Does anyone have a belief that a corporation should be contractually responsive if its product is involved in an accident?

19. Does anyone know anything about this case, the witnesses who will be called to testify, or the attorneys?

Attorneys:

Witnesses:

20. Does anyone know of any reason that he or she could not be a fair and impartial juror in this case?

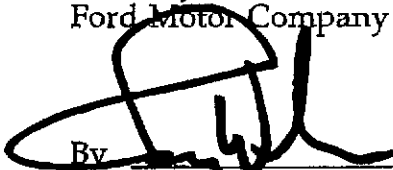
Ford also respectfully requests that the Court ask prospective jurors to compel a jury questionnaire, which Ford will produce to the Court and counsel at the time of the pre-trial conference.

DATED: January 27, 2003

VOIR DIRE QUESTIONS  
No C01-5311JKA)- 5-

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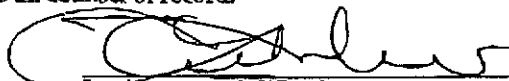
MILLS MEYERS SWARTLING  
Attorneys for the defendant  
Ford Motor Company

By 

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CERTIFICATION

I hereby certify that on 1-27-03, I  deposited in the mails of the United States of America,  placed with legal messengers,  faxed a copy of the document to which this certification is attached for delivery to all counsel of record.



Linda McIntosh Wheeler  
Mills Meyers Swartling

VOIR DIRE QUESTIONS  
No. C01-5311JKA)- 6-

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