TAB 2

Defendant's Proposed Jury Voir Dire

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

INTERMARK FABRIC CORPORATION	:	
	:	
v.	:	Case Number: 3:02 CV 1267 (AVC)
	:	
MICROFIBRES, INC.	:	

MICROFIBRES INC.'S PROPOSED INTRODUCTORY COMMENTS AND VOIR DIRE QUESTIONS

Microfibres Inc. submits the following proposed introductory comments and voir dire questions:

I. Introductory Comments By The Court

The purpose of the voir dire examination is to obtain a jury which will give a fair and unbiased consideration to this case, and not to pry into your personal affairs. If there is any fact or any reason why any of you might be bias in any way, you should disclose such fact or reason during this examination. It is your duty to do so.

II. Suggested Voir Dire Questions

I will now ask some basic questions anyone who can answer "yes" to a question, please raise your hand.

A) Have you or anyone close to you ever had any training in the field of law or done any legal or investigative work of any type?

B) Have you or anyone close to you worked in the textile, fabric, or upholstery industry?

C) Have you or anyone close to you had any engineering training?

D) Do any of you have any visual, hearing, or other problems that might impair your ability to observe, hear, or comprehend the proceedings?

E) The plaintiff is Intermark Fabric Corporation. Are you familiar with this company?

F) Do you know anyone who is or was employed by Intermark Fabric Corporation?

G) The Defendant in this case is Microfibres, Inc. Are you familiar with this company?

H) Do you know anyone who is or was employed by Microfibres?

I) Have you or anyone close to you ever used any products manufactured or sold by either party?

J) Intermark Fabric Corporation may call the following witnesses in this trial; William Lucchesi, Wayne Turcotte, Susan Strouse, Hemendrah Shah, Moustafa Nour, David Rahimi, Steven Rosenthal, Charles Bunch, Luther Boyd Madren, Peter Hadley, Ronald Perry, and Lawrence Goffney. Do you or anyone close to you know any of these individuals?

K) Microfibres, Inc. may call the following witnesses in this trial; James McCulloch, James Fulks, David Brookstein, Peter Hauser, William Laird, and Michael Pomianek. Do you or anyone close to you know of these individuals?

L) I will introduce you now to all the counsel who will be participating in this trial:

Plaintiffs
- William Cass
- Charles O'Brien
- Cantor Colburn

Defendants
- William R. Grimm
- Brent R. Canning
- Hinckley, Allen & Snyder, LLP

Have you or anyone close to you had any dealings with any of these gentlemen or any member of there firms?

M) Have any of you heard of or read about this case of do you have any knowledge of the facts on which this case is based or do you have any opinion or feeling as to the merits of either side?

N) With the fact that one side may put on more witnesses than the other side influence you in any way?

O) Do you have any strong feelings about patents or people or companies who obtain patents?

P) Have you or anyone close to you sought or obtained a patent?

Q) Do you know of any reason why you could not listen to the evidence and render a fair and impartial verdict if you were chosen as a juror in this case?