IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NORTHGATE TECHNOLOGIES, INC., ***Plaintiff/Counter-Defendant*****,** **v.** **STRYKER CORPORATION d/b/a STRYKER ENDOSCOPY,** ***Defendant/Counter-Plaintiff*****, and W.O.M. WORLD OF MEDICINE AG,** ***Defendant/Counter-Plaintiff*****.**	**Case No. 12-cv-7032** **Hon. Richard A. Posner**

DEFENDANT W.O.M. WORLD OF MEDICINE AG AND STRYKER CORPORATION'S PROPOSED QUESTIONS FOR VOIR DIRE

Defendants, W.O.M. World of Medicine AG ("WOM") and Stryker Corporation ("Stryker"), submit the following proposed areas of inquiry for *voir dire* and *voir dire* questions pursuant to the Court's March 20, 2014 Order.

1. Have you or anyone close to you ever worked for a medical device company or in the medical technology industry? If yes, please explain who, what company, when you/they worked there and your/their job responsibilities.
    - How would you describe your/their experience?

2. Do you know any person who is or has been employed by, conducted any type of business with, or had any association with any of the following companies or divisions? If yes, please explain:
    - Northgate Technologies
    - Stryker or Stryker Endoscopy
    - W.O.M. World of Medicine
    - Snowden-Pencer
    - CareFusion

3. Even if you or anyone you know has not had any direct experience with these companies, is anyone just generally familiar with any of these companies. If yes, what is your impression of the company?

4. Do you or a member of your immediate family now own, or have you or any such member ever owned, any stocks or bonds in any of those companies or organizations?

5. Do you know or have a relationship of any kind with any of the following persons:

- Robert Mantell
- Peter Manzie
- John C. Freeman
- Daniel Washburn
- Andres Rosales
- Chad Evans
- Jessica Mazzulo
- Justin Smith
- Karen Hassevort
- Marc Engelhardt
- Patrick Campbell
- Reid Cover
- Aaron Pettit
- Yves Köeth
- Mattias Hildebrand
- Bruce Burton
- Jack Goldberg
- Steven Dubowsky
- Cedric Walker
- David Yurkerwich
- David Lipson
- Gregory Sidak

6. You have been given a list of the attorneys and law firms involved in this litigation. Are you related to, or personally acquainted with any of those attorneys, or have you ever been represented by any of those attorneys or other associates or members of the listed law firms?

7. Do you have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?

8. Do you have any knowledge or experience with patents or ever applied for a patent?

9. Are you a named inventor or owner of any patents? Please explain.

10. Have you ever been taken advantage of in a business or personal situation? If yes, please explain.
    - What happened and what was the outcome?

11. Have you or anyone close to you ever invented something? If yes, please explain.
    - Was it patented?

12. Has anyone ever duplicated or taken credit for one of your original ideas or concepts? Please explain.

13. Has anyone had an idea stolen from them? Please explain what happened.

14. Have you or your family ever had any dealings with the United States Patent and Trademark Office? Please explain.

15. As a juror in a patent case, would any of you feel uncomfortable ruling against the decisions of the Patent & Trademark Office?

16. Who here believes the U.S. Patent Office rarely makes mistakes when it issues patents?

17. Have you ever worked for a company that had patented products or processes? Please explain.

18. Do you have any knowledge or familiarity with pneumatic devices or sensing devices?

19. Do you have any knowledge or familiarity with insufflation or devices which inflate or inflate and monitor?

20. Have you or a company you worked for ever accused someone of patent infringement? Please explain.

21. Have you ever been involved in the development of a new product or process?

22. Do you have any opinions about a patent giving exclusive rights in an invention to the inventors or their employer?

23. Do you have any experience, training or education in the medical field in any capacity? Please explain.

    - Does anyone have specific expertise in surgery? Please explain.

24. Have you or any family member ever had laparoscopic surgery? If yes, what was the outcome?

25. Do you have any expertise in the areas of accountancy, economics or financial forecasting? Please explain.

26. Have you personally or through your employment ever been involved in the manufacture of any medical products? Please explain.

27. Do you have any experience in marketing or sales? Please explain.

28. Have you ever been involved in a supplier-distributor relationship through your employment? Please explain.

29. Would anyone here say they have a negative view of German corporations? Please explain.

30. Do you think local companies have an advantage over out-of-state companies? What about over foreign-based companies?

31. Does anyone think that foreign-based companies have too much influence in American business?

32. Have you, a family member or close friend ever sued anyone or been sued?

33. 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 in this case?

34. Do you know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

Dated: May 12, 2014

W.O.M. WORLD OF MEDICINE AG

s/ E. Tim Walker
One of its attorneys

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Dated: May 12, 2014

STRYKER CORPORATION

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CERTIFICATE OF SERVICE

I, the undersigned attorney in the above-captioned case, hereby certify that on or before May 12, 2014, I caused a copy of the foregoing document to be served via CM/ECF upon the following Counsel of Record:

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