

# EXHIBIT A

**[Plaintiff's Proposed] Jury Questionnaire**

Juror Number \_\_\_\_\_

This questionnaire is being used to assist in selecting a jury for a trial that will deal with sensitive issues.

1. Name: \_\_\_\_\_
2. Age: \_\_\_\_\_
3. Sex: \_\_\_\_\_
4. Have you or anyone close to you ever worked for any company or organization that is owned by or run by Donald Trump or anyone in his family?
5. Have you or anyone close to you ever had business dealings with a company or organization that is owned by or run by Donald Trump or anyone in his family?
6. Do you or anyone close to you personally know Donald Trump or anyone in his family?
7. Do you or anyone close to you personally know E. Jean Carroll or anyone in her family?
8. Have you or anyone close to you been active in a political campaign for Donald Trump?
9. Have you heard or read about the New York grand jury indictment of Donald Trump? If yes, what is the source of information?

Yes: \_\_\_\_\_ Source(s): \_\_\_\_\_

No: \_\_\_\_\_

10. Do you have a strong reaction to the New York grand jury indictment of Donald Trump? If yes, what is your strong reaction?

Yes: \_\_\_\_\_ Reaction: \_\_\_\_\_

No: \_\_\_\_\_

11. Please list any organizations that you belong to or actively support by donating money or time:

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12. Have you ever used social media sites or platforms? If yes, which sites or platforms?

Yes: \_\_\_\_\_ Which platform(s): \_\_\_\_\_

No: \_\_\_\_\_

13. How often do you read the news (whether online or in print)? Which outlet(s)?

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14. How often do you watch cable news? Which network(s)?

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15. Have you or anyone close to ever sued someone or accused someone of serious wrongdoing?

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16. Have you or anyone close to you ever been sued or wrongfully accused of serious wrongdoing?

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