

EXHIBIT A

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. Highest Level of Education / Degrees: _____
5. Employment: _____
6. Employment of immediate family members:

7. 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?
8. 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?
9. Do you or anyone close to you personally know Donald Trump or anyone in his family?
10. What are your thoughts on Donald Trump as president of the United States?
11. What are your thoughts on Donald Trump as a businessman and media personality?
12. Do you have any strong positive or negative feelings about Donald Trump? If so, please describe
13. If you have negative feelings about Mr. Trump, do you think there is any risk that would prevent you from objectively listening to the evidence presented in this case?
14. If you have any negative feelings about Mr. Trump, do you think there is a possibility that may affect your ability to be fair and impartial during your deliberations?
15. Are you aware of criminal investigations pending regarding Mr. Trump? If so, what are your thoughts on those investigations?
16. Would the criminal investigations interfere with your ability to be fair in this case?

17. Are you aware of Mr. Trump's presence on social media? Is there anything about those circumstances that may interfere with your ability to be fair and impartial in this case?
18. Have you formed any opinions regarding Mr. Trump's truthfulness? If so, what are those?
19. During the 2016 and 2020 presidential elections, were you actively involved in political campaigns against Mr. Trump? If so, please explain your involvement.
20. Do you or anyone close to you personally know E. Jean Carroll or anyone in her family?
21. Are you aware of E. Jean Carroll's work as an author, columnist, or television personality? If so, do you think that might interfere with your ability to objectively listen to the evidence in this case and render a fair and impartial verdict?
22. Have you or anyone close to you been active in a political campaign for Donald Trump?
23. Please list any organizations that you belong to or actively support by donating money or time:
- _____
24. Have you ever used social media sites or platforms? If yes, which sites or platforms?
- Yes: _____ Which platform(s): _____
- No: _____
25. How often do you read the news (whether online or in print)? Which outlet(s)?
- _____
- _____
26. How often do you watch cable news? Which network(s)?
- _____
- _____
27. Have you or anyone close to ever sued someone or accused someone of serious wrongdoing? _____

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28. Have you or anyone close to you ever been sued or wrongfully accused of serious wrongdoing?
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29. Have you or anyone close to you ever been the victim of sexual violence?
30. If you or someone close to you has been the victim of sexual violence, was that incident reported to law enforcement?
31. If you or someone you know has been the victim of sexual violence, would anything about that experience interfere with your ability to be fair in this case?
32. This case involves allegations of sexual violence that purportedly occurred in a Bergdorf Goodman store in the 1990s. Have you read, seen or heard anything about this case? If yes, please explain.
33. If you have read, seen or heard anything about the alleged Bergdorf Goodman incident, have you already formed an opinion about what happened? If so, what is that opinion?
34. Based on your previous training, education, experience, or employment, do you possess any special knowledge or expertise on the subject of sexual violence? If so, please explain.
35. Has the #metoo movement impacted your life? If yes, please describe.
36. Do you have an opinion whether Mr. Trump mistreats or perpetrates sexual violence on women? If yes, please explain.
37. Would you feel pressure from family, friends or other sources to reach a certain verdict in a case involving Mr. Trump? If yes, please explain.
38. The jury selected in this case will be anonymous, meaning the identity of the jurors will be kept from the public. Will anything about that circumstance influence your ability to be fair and impartial in this case?
39. In this case, the burden of proof is on Plaintiff E. Jean Carroll to prove her claims by a preponderance of the evidence, meaning she must prove that her version of the alleged facts are more likely true than not true in order to establish liability against Mr. Trump. Is there anything about this case, the allegations, or the parties that may prevent you from holding plaintiff to her burden of proof?

40. Is there anything about the circumstances of this case, the allegations, or the parties which may interfere with your ability to be fair and impartial during the trial and your deliberations?