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FILED
LOS ANGELES SUPERIOR COURT

DEC 01 2011

JOHN A. CLARKE, CLERK
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8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10 **DAVID COPPEDGE**, an individual;
11
12 Plaintiff,

Case No. BC435600

The Honorable Ernest M. Hiroshige, Dept. 54

13 vs.

**PLAINTIFF DAVID COPPEDGE'S
PROPOSED JURY VOIR DIRE
QUESTIONS**

14 **JET PROPULSION LABORATORY**, form
15 unknown; **CALIFORNIA INSTITUTE OF**
16 **TECHNOLOGY**, form unknown; **GREGO-**
17 **RY CHIN**, an Individual; **CLARK A.**
18 **BURGESS**, an Individual; **KEVIN KLENK**,
19 an Individual; and **Does 1** through **25**, inclu-
20 sive,

FSC: December 2, 2011
HEARING TIME: 8:30 a.m.
DEPT: 54

Trial Date: December 14, 2011

21 Defendants.

BY FAX

22 TO THIS HONORABLE COURT:

23 PLAINTIFF DAVID COPPEDGE hereby submits his proposed questions to be asked
24 during jury selection.

25 **EMPLOYMENT DISCRIMINATION**

- 26 1. Have you or a family member ever owned a business?
27 2. Have you or a family member ever had employees of their own?
28

- 1 3. Have you or a family member ever been employed in a situation where they've super-
2 vised other employees?
- 3 4. Do you have any education, training, or experience in employment law?
- 4 5. Do you have any human resources training or experience?
- 5 6. Have you or a family member ever worked in a human resources department?
- 6 7. Have you or a family member ever disciplined or terminated an employee?
- 7 8. Have you ever been an employee?
- 8 9. Have you ever been in a situation at work where you felt you were being discriminated
9 against? If so, please explain what occurred.
- 10 10. Have you ever been in a situation at work where you felt you were being harassed? If so,
11 please explain what occurred.
- 12 11. Have you or any family member ever filed or thought about filing a discrimination charge
13 or lawsuit against anyone? If so, please explain.
- 14 12. Have you or any family member ever been discriminated against or witnessed any dis-
15 crimination by an employer because of age, sex, race, disability, or religion? If yes,
16 please explain.
- 17 13. Have you or anyone you know ever sued or filed a claim against a former employer? If
18 yes, please explain.
- 19 14. In your opinion, how much religious discrimination is in the business world today – a lot,
20 some, little, or none?
- 21 15. In your opinion, what are some of the ways a company could discriminate against an em-
22 ployee on the basis of the employee's religion?
- 23 16. Do you think it's too hard to fire people?
- 24
- 25
- 26
- 27
- 28

- 1 17. Have you ever worked with someone who should have been fired, but wasn't?
- 2 18. Have you ever wanted to fire someone but were told you couldn't?
- 3 19. Have you ever been falsely accused of treating a subordinate unfairly?
- 4 20. Has a subordinate or co-worker ever complained to you that he or she was treated unfair-
- 5 ly when in reality they were just performing poorly?
- 6
- 7 21. What are your feelings about a fired employee who comes into court and asks for money
- 8 damages as a result of being wrongfully disciplined or terminated?
- 9 22. Do you think people should be able to use the civil court system to address employment
- 10 disputes?
- 11 23. If you were fired or laid off, would you be able to easily find other equivalent employ-
- 12 ment? Why or why not?
- 13
- 14 24. Is job security something that is important to you and your family? Why or why not?
- 15 25. If you felt you were unfairly disciplined or terminated from employment, would you
- 16 bring a lawsuit?
- 17 26. Have you ever felt like you were wrongfully disciplined or fired from a job? If so, what
- 18 did you do, if anything, in response?
- 19 27. Have you ever felt that your spouse or a family member or a close friend was wrongfully
- 20 disciplined or fired from a job? If so, why and what did they do about it, if anything?
- 21 How do you feel about what they did?
- 22
- 23 28. What are your feelings about a long-time employee being terminated from a job?
- 24 29. Do you think an employer should be able to fire employees anytime they want?
- 25 30. What are your feelings about your job?
- 26 31. What are your feelings about your employer?
- 27
- 28

- 1 32. How satisfied or dissatisfied are you with your present job?
- 2 33. Have you ever been responsible for hiring, firing, training, or promoting employees?
- 3 34. Have you ever been terminated, dismissed, fired, asked to resign from a job, or had any
- 4 other bad experience(s) with an employer? If yes, please explain:
- 5
- 6 35. Have you ever had a bad experience with a co-worker, supervisor, boss, or employer? If
- 7 yes, please explain.
- 8 36. Have you, any family members or friends ever worked for or done business with Jet Pro-
- 9 pulsion Laboratory or California Institute of Technology? If yes, who and what is the re-
- 10 lationship with these institutions?
- 11 37. Have you, any family members or friends ever been employed at Jet Propulsion Labora-
- 12 tory or California Institute of Technology? If yes, please explain the circumstances.
- 13
- 14 38. Which of the following describes your view or opinion of the Jet Propulsion Laboratory?
- 15 California Institute of Technology? Very positive, positive, somewhat positive, negative,
- 16 very negative? Please tell us why you feel this way.
- 17 39. In your opinion, what are some *valid* reasons for an employer to fire or terminate an em-
- 18 ployee?
- 19
- 20 40. In your opinion, what are some *invalid* reasons for an employer to fire or terminate an
- 21 employee?
- 22 41. Have you ever felt forced out of a job? If yes, please explain.
- 23 42. Have you ever received a written warning regarding your job performance by your em-
- 24 ployer? If yes, please explain.
- 25 43. Tell us if you think it is acceptable or unacceptable to talk about the following topics at
- 26 work: Politics. Personal Problems, Sex, Religion.
- 27
- 28

1 44. If you were at work and a co-worker frequently talked about his religion, what if anything
2 would you do?

3 45. In a case where an employee is suing his former employer claiming that he was discrimi-
4 nated against and fired because of his religious beliefs, whom would you start the trial fa-
5 voring, even if only slightly -- the employee, employer or neither? Why?
6

7 46. Do you have any feelings or opinions that would affect your ability to be a fair and im-
8 partial juror in a case where an employee has brought a lawsuit against his former em-
9 ployer claiming religious discrimination? If yes, explain.

10 **INTELLIGENT DESIGN/CREATIONISM**

11 47. What is your understanding of intelligent design? Creationism?

12 48. Do you have an idea whether they are the same concept or two different concepts? If two
13 different concepts, what is your understanding as to their distinction?
14

15 49. What are your feelings or beliefs about intelligent design? Creationism?

16 50. Do you believe intelligent design is a religious or a scientific concept? Creationism?

17 51. Would you have any objection if intelligent design was discussed in a science course?
18 Why or why not? Creation? Why or why not?

19 52. Would you have an objection if intelligent design was discussed in a science course?
20 Why or why not? Creationism? Why or why not?

21 53. Do you believe a person can be both a scientist and a believer in intelligent design?
22 Creationism? If so, why? If not, why not?
23

24 **RELIGION**

25 54. What are your feelings about religion in general?

26 55. Do you believe religious beliefs are valid beliefs, or just superstition?
27
28

- 1 56. What are your feelings about religious people?
- 2 57. Have you ever changed your religion? If yes, please tell us why.
- 3 58. How important a role does religion play in your daily life?
- 4 59. What are your feelings or opinions about Christians? Evangelical Christians?
- 5 60. What are your feelings about the relationship between science and religion?
- 6 61. Do you think that talking about religion in the workplace is inappropriate? Why or why
- 7 not?
- 8
- 9 62. Do you think employers should have to accommodate an employer's expression of reli-
- 10 gious beliefs in the workplace, or should be able to exclude them? Why or why not?
- 11 63. Do you think it's possible for the member of one religion to discriminate on the basis of
- 12 religion against another member of that same religion? If so, how? If not, why not?
- 13
- 14 64. What is your feeling about celebrating Christmas or the holiday season at the office, and
- 15 referring to the celebration as a "Christmas Party?"

16 **POLITICAL EXPRESSION/PROPOSITION 8**

- 17 65. How do you feel about people expressing their political views in the workplace?
- 18 66. Do you think that talking about politics in the workplace is acceptable or unacceptable? If
- 19 so, why? If not, why not?
- 20
- 21 67. Do you believe an employer should have to allow an employee to express his or her polit-
- 22 ical opinions in the workplace, or should be able to exclude them?
- 23 68. Do you have any strong feelings about Proposition 8, one way or the other?
- 24 69. Were you involved in the Proposition 8 campaign, on either side?
- 25 70. Do you have any strong feelings for or against same-sex "marriage"? If so, what are
- 26 they?
- 27
- 28

1 71. Do you believe reasonable people can disagree about same-sex "marriage"? Why or why
2 not?

3 DATED: November 30, 2011

THE BECKER LAW FIRM

William J

Becker Jr, Esq

Digitally signed by William J Becker Jr,
Esq
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By:

WILLIAM J. BECKER, JR., ESQ.

Attorneys for Plaintiff, DAVID COPPEDGE

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