

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS  
URBANA DIVISION**

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

**Plaintiff,**

**v.**

**RENT-A-CENTER EAST, INC.,**

**Defendant.**

**Case No. 16-cv-2222**

**Magistrate Judge Long**

**PLAINTIFF EEOC'S PROPOSED VOIR DIRE**

Plaintiff EEOC hereby submits its Proposed Voir Dire Questions and respectfully requests that the following questions be asked on voir dire of the jury in this case, to the extent the information is not already provided in advance to counsel by the court or clerk's office:

1. Invite each juror, in turn, to provide the following information:
  - City or town of residence.
  - Who resides with you.
  - Current occupation (former if retired or currently unemployed).
  - If married, current (or former) occupation of spouse and any other adult members of your household.
  - Any military service, including branch, rank and approximate date of discharge.
  - Highest level of education and major area(s) of study.
  - Memberships and positions held in any community groups or other organizations.
  - Hobbies and leisure activities.
2. Did any of you in the jury pool know each other before today?
3. Does any of you have any training or work experience of the fields of law, human resources, personnel management or similar fields? Explain briefly.

4. How many of you have ever owned any kind of business or been a supervisor or manager at a business? Explain: (a) type of business; (b) size of business; (c) ever have discrimination claims filed against the business?

5. If you have been in a supervisory position, have you ever had to terminate or discipline an employee? If so, can you describe the circumstances and the experience?

6. Have you ever been laid off or fired from a job? Did you believe that you were treated fairly?

7. Have you ever served as a juror before? If yes, in what kind of case? [If criminal:] Do you understand that this case is a civil case and not a criminal case? The burden of proof in a civil case is different than in a criminal case, and I will give the jury instructions about that at the end of this case. Will you be able to put aside what you may have heard at the criminal trial and instead follow the instructions that I give you at the end of this case?

8. Have you, any member your family, or close friends ever been a party to or a witness in a lawsuit? If yes, what was the nature of the lawsuit?

9. Have any of you, any member of your family, or close friends ever had any negative experience with a lawyer, a court, or a legal proceeding that would affect your ability to be impartial in this case?

10. Have any of you, any member of your family, or close friends ever been accused of any kind of violation of workplace laws, such as harassment or discrimination? [If yes, have venire member explain privately at side bar]. Would this affect your ability to serve as an impartial juror in this case?

11. Have any of you, your family, or close friends ever had any interactions with the EEOC or any state or local entity charged with enforcing anti-discrimination and anti-retaliation laws? Was there anything about that experience that would affect your ability to serve as an impartial juror in this case?

12. In this case, the plaintiff is the Equal Employment Opportunity Commission, which is a federal government agency that enforces laws against discrimination and harassment in the workplace. Do any of you have strong feelings about whether the government should or should not be involved in enforcing those laws against private employers? If yes, please explain.

13. Do you have any strong opinions about laws that prohibit employers from discriminating against transgender people in the workplace? If yes, please explain. Is there anything about your beliefs in this regard that would affect your ability to be impartial in this case?

December 15, 2017

Respectfully Submitted,

s/ Miles Shultz

Miles Shultz  
Trial Attorney  
U.S. Equal Employment Opportunity Commission  
500 W. Madison St., Ste. 2000  
Chicago, IL 60661

**CERTIFICATE OF SERVICE**

I hereby certify that on today's date, I caused the EEOC'S PROPOSED VOIR DIRE to be served upon counsel to Defendant via the court's Electronic Case Filing system, pursuant to Local Rule 5.3(A).

December 15, 2017

Respectfully Submitted,

s/ Miles Shultz

Miles Shultz

Trial Attorney

U.S. Equal Employment Opportunity Commission

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