

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ALINA BOYDEN and
SHANNON ANDREWS,

Plaintiffs,

Case No. 17-cv-264

v.

STATE OF WISCONSIN DEPARTMENT
OF EMPLOYEE TRUST FUNDS, et al.,

Defendants.

PLAINTIFFS' PROPOSED *VOIR DIRE*

Plaintiffs, Alina Boyden and Shannon Andrews, respectfully submit the following Proposed *Voir Dire*.

1. Has any member of your family or a close friend ever been a party to or a witness in a lawsuit? If so, what kind of lawsuit was it? Would what you learned about that case affect your ability to decide this case fairly?
2. Has any member of your family or a close friend ever worked for the State of Wisconsin? If so, what kind of work did they do?
3. Could you return a verdict against the State of Wisconsin and in favor of Plaintiffs, Alina Boyden and Shannon Andrews, if the evidence and the applicable law supported a verdict in favor of Plaintiffs?
4. Would you have any hesitancy to award a money verdict against the State of Wisconsin if the evidence and the applicable law supported a verdict in favor

of Plaintiffs, even though doing so would require the State to use tax dollars to pay the Plaintiffs money?

5. Has anyone filed a charge of employment discrimination against you, a company that you or any of your close family members own, or against any of your employers?

6. If so, what was the alleged basis of the employment discrimination? If so, is there anything about what happened regarding the charge of employment discrimination that would affect your ability to be a fair juror in this lawsuit?

7. Do you believe that all Americans have a right to be free from sex discrimination at work?

8. Will you be able to follow the instructions I give you about what sex discrimination is, even if what I tell you is different from what you previously thought or is something you personally disagree with?

9. Do you agree that people with the same qualifications, who do the same job, and work the same hours should be paid the same amount of money?

10. Do you agree that it would still be wrong for any employer to only give a valuable benefit, such as an end-of-year bonus, to women?

11. What if your employer told you and your co-workers it couldn't afford to give the bonus to everyone, so it had to make a choice and decided to give the bonus only to women?

12. Do you agree that if an employer provides health benefits to all of its employees, that all of the employees should be given the same benefits?

13. Do you agree that if an insurance plan covers a particular treatment, that everyone who needs that treatment should be covered equally?

14. Do you agree that modern medicine allows us to treat many medical conditions today that were not treatable in the past?

15. Do you agree that a patient's care should be directed by their doctor and the other medical providers who treat them?

16. Do you agree that people are entitled to make medical decisions based on what is best for them, even if you believe that you would make a different decision if faced with the same condition?

17. Do you have health insurance through your employer? Do you believe that everyone should be able to receive the health care they need? Are there any limits to the kind of health people should receive? If so, what are those limits and who should set them?

18. Do you believe that everyone should be treated fairly when trying to obtain health insurance coverage for their medical problems?

Dated this 7th day of September, 2018.

HAWKS QUINDEL, S.C.

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