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**Attorneys for Plaintiff**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

**JAMES M. CLEAVENGER,**

Case No. 6:13-cv-01908-DOC

Plaintiff,

**PLAINTIFF'S PROPOSED VOIR DIRE  
QUESTIONS**

vs.

**UNIVERSITY OF OREGON (an Agency and  
Instrumentality of the State of Oregon), et al.,**

Defendants.

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Plaintiff requests the following voir dire questions:

1. Has anyone ever been a law enforcement officer?
2. Does anyone have a family member or close friend who is a law enforcement officer?
3. Have you, or a close friend or relative, ever believed that you were wrongfully retaliated against or fired by your employer for something that you did at work?

4. Do you have any training, knowledge, or experience with regard to procedures that law enforcement officers are supposed to follow?
5. Have you ever been a party to a civil or criminal case?
6. Does anyone believe that the law should not allow legally wronged people to recover damages for emotional distress?
7. Who knows you best in this world, and if they were asked, how would they describe you?
8. Has anyone ever worked in human resources (HR)?
9. Have you ever been involved with management or a manager at a public or private entity? If so, have you ever been involved in hiring or firing people? If so, please explain.
10. Have you or someone close to you ever been employed by the University of Oregon or another public entity? If so, for whom, and for what time period?

DATED August 10, 2015.

*/s/ Mark McDougal*

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**Attorney for Plaintiff**

**CERTIFICATE OF SERVICE**

I certify that on August 10, 2015, I served or caused to be served a true and complete copy of the foregoing **PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS** on the party or parties listed below as follows:

Andrea Coit  
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Via CM / ECF Filing

*/s/ Mark McDougal*

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