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7 Defendants PHARRELL WILLIAMS,
ROBIN THICKE and CLIFFORD
8 HARRIS, JR. and Counter-Defendants
9 MORE WATER FROM NAZARETH
PUBLISHING, INC., PAULA MAXINE
10 PATTON individually and d/b/a
HADDINGTON MUSIC, STAR TRAK
ENTERTAINMENT, GEFLEN
11 RECORDS, INTERSCOPE RECORDS,
UMG RECORDINGS, INC., and
12 UNIVERSAL MUSIC DISTRIBUTION

13 UNITED STATES DISTRICT COURT

14 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

15 PHARRELL WILLIAMS, an
individual; ROBIN THICKE, an
16 individual; and CLIFFORD HARRIS,
JR., an individual,

17 Plaintiffs,

18 vs.

19 BRIDGEPORT MUSIC, INC., a
20 Michigan corporation; FRANKIE
CHRISTIAN GAYE, an individual;
21 MARVIN GAYE III, an individual;
NONA MARVISA GAYE, an
22 individual; and DOES 1 through 10,
inclusive,

23 Defendants.
24

CASE NO. CV13-06004-JAK (AGR_x)
Hon. John A. Kronstadt, Ctrm 750

**PLAINTIFFS AND COUNTER-
DEFENDANTS' [PROPOSED]
SPECIAL QUESTIONS FOR VOIR
DIRE**

Jury Trial:
Date: February 10, 2015
Time: 9:00 a.m.
Ctrm.: 750

Action Commenced: August 15, 2013

25 AND RELATED COUNTERCLAIMS.
26

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1 Plaintiffs and Counter-Defendants PHARRELL WILLIAMS, ROBIN
2 THICKE and CLIFFORD HARRIS, JR. and Counter-Defendants MORE WATER
3 FROM NAZARETH PUBLISHING, INC., PAULA MAXINE PATTON
4 individually and d/b/a HADDINGTON MUSIC, STAR TRAK
5 ENTERTAINMENT, GEFFEN RECORDS, INTERSCOPE RECORDS, UMG
6 RECORDINGS, INC., and UNIVERSAL MUSIC DISTRIBUTION hereby set forth
7 their proposed *voir dire* questions pursuant to Section C.3 of the Court's Order on
8 Court/Jury Trial filed 1/06/14 (Document 53) as follows:

- 9 1. What is your educational background?
- 10 2. List your degrees obtained.
- 11 3. How do you use your education in your career?
- 12 4. Career/job
- 13 5. Spouse occupation
- 14 6. Hobbies
- 15 7. Children
- 16 8. Clubs or organizations
- 17 9. Have you ever been a defendant?
- 18 10. Have you ever brought a lawsuit against someone?
- 19 11. Have you ever retained a lawyer?
- 20 12. Do you think lawyers are more or less truthful than others?
- 21 13. Have you ever had any training in law?
- 22 14. Have you ever worked in a law firm or for a lawyer?
- 23 15. Do you have any close friends or relatives who have had any training in
24 law?
- 25 16. Have you ever served on a jury before?
- 26 17. If yes, was it a criminal or civil case? Was a verdict reached? For the
27 plaintiff/the State/the government or for the defendant? What kind of case was it?
- 28 ///

- 1 18. Have you ever testified as a witness in any case? If yes, for the
- 2 plaintiff/the State/the government or for the defendant? What kind of case?
- 3 19. What genre or styles of music do you listen to?
- 4 20. Do you have any formal music training?
- 5 21. Ever play musical instrument?
- 6 22. Are you or have you ever been in a band?
- 7 23. Have you ever written a song or a musical composition?
- 8 24. Can you read music?
- 9 25. Are you familiar with Marvin Gaye?
- 10 26. Are you familiar with Robin Thicke?
- 11 27. Are you familiar with Pharrell Williams?
- 12 28. Are you familiar with T.I.?
- 13 29. Have you heard the sound recording of Marvin Gaye's "Got to Give It
- 14 Up"?
- 15 30. Have you heard the sound recording of Robin Thicke's "Blurred
- 16 Lines"?
- 17 31. Have you ever seen a music video for "Blurred Lines" How many
- 18 times? Any reaction on first view?
- 19 32. Do you believe music videos glorify violence, sex, and drugs?
- 20 33. If the lyrics to a song or a music video made by one of the parties in
- 21 this case offended you, do you think you would still be able to make an impartial
- 22 determination in this case?
- 23 34. If video presentations of songs created by one of the parties in the case
- 24 contained scenes that offended you, such as scantily clad women, profanity, and
- 25 glorification of violence, do you think you would still be able to make an impartial
- 26 determination in this case?
- 27 35. DISPLAY BOTH BLURRED LINES MUSIC VIDEOS. Do the lyrics
- 28 of this song or contents of the video make you uncomfortable? Do the lyrics shock

1 or annoy you? Can you disregard those feelings and make an impartial
2 determination in this case, even if that determination benefits the performers of this
3 song?

4 36. Have you ever read anything about this case?

5 37. Have you heard or do you know anything about this case other than
6 what the Judge has told you so far?

7 38. Do you subscribe to any music streaming service? Spotify, Pandora,
8 Rhapsody, Beats?

9 39. If yes, what channels do you subscribe to?

10 40. Do you have an iTunes account?

11 41. Have you ever downloaded any songs by Marvin Gaye?

12 42. When was the last time you purchased a song on iTunes or any other
13 digital distribution system? What song was it?

14 43. What radio stations do you listen to?

15 44. How many hours a day do you listen the radio?

16 45. Do you watch music videos?

17 46. How often?

18 47. What is your favorite song?

19 48. Who are your favorite recording artists?

20 49. What is your favorite television show?

21 50. Ever watched The Voice?

22 51. Do you know what a Grammy Award is?

23 52. Have you ever watched a television broadcast of the Grammy's?

24 53. Do you ever visit websites for TMZ, Perez Hilton or Hollywood
25 Reporter?

26 54. When is the last time you purchased a CD?

27 55. Have you, any members of your family or close friends ever been
28 involved in a dispute regarding copyright infringement?

1 56. If one or more of the parties to this litigation is not present for all or a
2 part of this trial, will you still be able to judge that party impartially and reach no
3 decision based on that party's lack of presence for this trial?

4 57. Do you understand that all jurors must agree on the answers to
5 questions presented to you after trial if there is to be a resolution of this dispute? If
6 you firmly believe in your position, but the other 7 jurors disagree, will you
7 nonetheless stick by our beliefs or will you defer to the majority?

8 58. Do you have any interest in the outcome of this case?

9 59. You will be sworn by the Court to try this case upon the facts presented
10 in the courtroom and nothing else. Can you lay aside any misinformation or
11 preconceptions which you may receive from any other source and try the case solely
12 on the facts and the testimony you hear from the witnesses?

13 60. If you are selected as a juror in this case, can you commit to keeping an
14 open mind regarding the merits of the different parties' positions until all the
15 evidence is in and the case is submitted to you?

16 61. The Court will instruct you on the law that will be applicable to the
17 evidence in this case. Can you follow the Court's instructions even if you don't
18 agree with the results? Even if you are sympathetic to the other party?

19 62. Do you understand that keeping an open mind includes when you have
20 adjourned to the jury room and begin deliberations on the case?

21 63. Do you understand that just because a party files a lawsuit and the case
22 goes to trial, that it does not necessarily mean that another party did something
23 wrong?


24 64. Some of the concerns that the lawyers have about jurors who are going
25 to sit on this case must be obvious to you by now. Is there anyone on the panel who
26 feels that there is something that they were not asked but should have been and that
27 they would like to disclose to the court now or in private?

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1 65. During the exercise of challenges, an attorney may excuse a juror that
2 you like or you think should be let on the jury. In exercising these challenges, the
3 parties have the absolute right to choose among prospective jurors without giving
4 any particular reason for doing so. Will you hold it against the attorney or his client
5 if an attorney excuses a prospective juror you think should be left on the panel?

6
7 DATED: January 14, 2015

KING, HOLMES, PATERNO &
BERLINER, LLP

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9
10 By: 
11 HOWARD E. KING
12 SETH MILLER
13 Attorneys for Plaintiffs and Counter-Defendants
14 PHARRELL WILLIAMS, et al.
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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2015, I electronically filed the foregoing **PLAINTIFFS AND COUNTER-DEFENDANTS' [PROPOSED] SPECIAL QUESTIONS FOR VOIR DIRE** with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.



Joey S. Gossett

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