

Thomas M. Kerrane and Julia Kerrane v. Amchem Products, Inc., et. al.
Anthony Grgas and Vedrana Grgas v. A. O. Smith Water Products, Co. et. al.
Thomas J. Cullen v. A. O. Smith Water Products, Co. et. al.
William F. Mammes and Alexandra Mammes v. A. O. Smith Water Products, Co., et. al.

JUROR QUESTIONNAIRE

BACKGROUND INFORMATION

1. Name: _____ Age: _____ Sex: _____

2. Do you speak, understand, and write English fluently?
_____ No
_____ Yes

3. Please state the number of years you have:
a) lived in this country:
b) lived at your current address:

4. Where were you born?

5. Are you currently:
_____ Single
_____ Married

6. Do you have any children?
_____ No
_____ Yes

7. What is the highest level of education you have completed?
_____ Less than high school
_____ High school diploma/G.E.D.
_____ Trade/Technical School
_____ Some College
_____ College Degree
_____ Post-graduate/Professional School

If you have completed a level of study beyond high school, please state your area study and the number of years you studied.:

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8. Are you currently employed?

_____ No

_____ Yes

If you answered "Yes", please state the name of your employer and your occupation.: ____

9. For each adult in your household, please state their occupation and their relationship to you.

10. Have you ever sat on a jury before?

_____ No

_____ Yes

If you answered "Yes", please give the following:

a) When

b) Where _____

c) Type of jury?

_____ Grand Jury _____ Trial Jury _____ Both

d) Type of case?

_____ Criminal _____ Civil _____ Both

e) Did the jury reach a verdict?

_____ Yes _____ No _____ Both

11. Have you, or has anyone close to you (including family members, friends, or coworkers) ever

been party to a lawsuit, either as a plaintiff or defendant?

_____ No
_____ Yes

12. Have you, or has any member of your immediate family, ever worked at a job in the following areas:

	Yes	No
a) Building Construction	_____	_____
b) Automotive Manufacturing	_____	_____
c) Automotive Engineering	_____	_____
d) Automotive Maintenance and Repair	_____	_____
e) Metal Work	_____	_____
f) Insulation Installation	_____	_____
g) Boiler Construction	_____	_____
h) Brake Manufacturing	_____	_____
i) Brake Maintenance and Repair	_____	_____

If you answered “Yes” to any of the above, please give the name of the employer, the specific type of work done, and the time period of employment:

13. Have you, or has anyone close to you (including family members, friends, or coworkers), ever worked with, received special training concerning, or otherwise had any significant experience with or exposure to asbestos, asbestos products, or asbestos abatement?

Yes: _____ No: _____

If you answered “Yes”, please describe:

14. Have you, or has anyone close to you (including family members, friends, or coworkers), ever worked with, received special training concerning, or otherwise had any significant experience with or exposure to known or potentially toxic substances?

Yes: _____ No: _____

If you answered "Yes", please describe:

15. Have you, or has a member of your immediate family, ever worked for an insurance company handling general liability claims or for a law firm handling personal injury or products liability matters.

Yes: _____ No: _____

If you answered "Yes", please give the name of the employer, the specific type of work done, the specific type of claims or matters handled, and the time period of employment:

16. Have you read or heard anything about any other lawsuits involving exposure to asbestos or asbestos containing products?

Yes: _____ No: _____

If you answered "Yes", please describe:

17. Have you, or has anyone close to you (including family members, friends, and co-workers), ever been diagnosed with or treated for the following

	You	Someone Close To You
i) lung cancer	_____	_____
ii) mesothelioma	_____	_____
iii) any other type of cancer	_____	
iv) any type of breathing, respiratory, or lung condition	_____	_____
v) an illness or health condition (including asbestosis) you believe to be caused by exposure to asbestos or another known or potentially toxic substance	_____	_____

If you selected “You” or “Someone Close To You” for any of the five categories above, please describe the type of condition, the cause, and, if you believe the condition was caused by exposure to asbestos or any other type of known or potentially toxic substance, the nature and source of the exposure:

18. Have you, or has someone close to you (including family members, friends, and coworkers), ever been involved in a lawsuit concerning one of the five categories of medical conditions described in Question 17?

Yes: _____ No: _____

If you answered “Yes”, please state the nature and outcome of the lawsuit and the nature of your involvement:

19. This trial is expected to last 4 to 5 weeks. Do you have any commitments or obligations that would make it difficult for you to sit as a juror for this period of time?

Yes: _____

No: _____

If you answered "Yes", please explain: _____

20. After completing this questionnaire, is there anything you can think of that would make it difficult for you to be a juror in this case, or that would be relevant to your jury service in this trial?

Yes: _____

No: _____

If you answered "Yes", please explain: _____
