

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NOVEL COMMODITIES S.A.,	:	
	:	No. 11-cv-6339 (PGG)
Plaintiff,	:	
	:	ECF CASE
- v -	:	
	:	
QBE INSURANCE CORPORATION,	:	
	:	
Defendant.	:	
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JOINT PROPOSED VOIR DIRE QUESTIONS

1. Please state your name, age, and county of residence.
2. How far did you go in school?
3. What is your current occupation or business? If you are retired or unemployed, please describe your last employment.
 - a. How long have you been with that employer?
 - b. What is the nature of your work?
4. Where else have you been employed over the past five years?
5. Do you know Michael Sullivan, Andrew Solomon, or Karen Abravanel, the attorneys for the Plaintiff?
6. Do you know Michael Knoerzer, Stephen Kennedy, or Victoria Melcher, the attorneys for the Defendant?
7. Do you or anyone you know now or ever have any relationship with Sullivan & Worcester LLP, the Plaintiff's attorney's firm?
8. Do you or anyone you know now or ever have any relationship with Clyde & Co US LLP, the Defendant's law firm? Did you or anyone you know ever have any relationship with Condon & Forsyth?

9. Do you know any of the following, who may be called as witnesses: Wayne Bayer, James Besch, Frank Gouverne, John Hertzner, Randall West?
10. Do you know anything about Novel Commodities S.A.?
11. Do you know anything about Access Global Capital LLC?
12. Do you know anything about CIA. Arrochera Covadonga?
13. Do you know anything about QBE Insurance Corporation?
14. Do you have any insurance?
 - a. What kinds of insurance policies do you have?
15. Are you insured by QBE?
16. Have you ever made an insurance claim?
 - a. If so, please describe the claim and its outcome.
17. Have you or someone you know had a dispute in the past with insurance companies?
 - a. If so, please describe.
 - b. If so, do you believe that these past problems influence your thinking about insurance companies?
18. Have you or someone you know ever worked for:
 - a. an insurance company;
 - b. an insurance claims adjustor;
 - c. an insurance broker or agent;
 - d. a company that sells or buys food products such as rice, beans or wheat?
19. Do you know anything about trade credit insurance?
20. Have you, a family member, or a close friend ever filed a claim or lawsuit of any kind?
 - a. If so, what kind of case?
 - b. How was it resolved?
21. Have you ever served as a juror in a trial in any court?
 - a. If so, when?

- b. In what court?
 - c. Was it a civil case or a criminal case?
 - d. What was the nature of the case?
 - e. Did the jury reach a verdict? What was the verdict?
22. Do you know of any reason why you would not be a fair and impartial juror?
23. Is there a particular reason you would want to serve on this case?
24. Is there any experience that we have not discussed that would influence you, or make you lean even slightly one way or the other before this trial starts?
25. Will you be able to deliberate based solely on the evidence you hear, and not speculate on what you have not heard?
26. If you are selected as a juror in this case, you will be required to decide the case solely on the evidence introduced and the instructions the judge will give you concerning the law, whether you agree with the law or not. Is there any reason you could not do that?

Dated: April 30, 2013

SULLIVAN & WORCESTER LLP

By: /s/

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