

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

TRADEMARK PROPERTIES, INC., a)
South Carolina corporation; RICHARD C.) Civil Action No. 2:06-cv-2195-CWH
DAVIS, an individual,)
)
Plaintiffs,)
)
vs.)
)
A&E TELEVISION NETWORKS,)
)
Defendant.)

DEFENDANT’S PROPOSED VOIR DIRE

Pursuant to Local Rule 47.04, Defendant A&E Television Networks requests the Court ask the following questions of prospective jurors:

1. Have you or any member of your family currently or in the past ever been represented by Attorney Frank Cisa or the law firm of Cisa & Dodds?
2. Have you or any member of your family currently or in the past ever been employed by Attorney Frank Cisa or the law firm of Cisa & Dodds?
3. Have you or any member of your family currently or in the past ever been represented by Attorney Richard Farrier or the law firm of Nelson, Mullins, Riley & Scarborough?
4. Have you or any member of your family currently or in the past ever been represented by Attorney Jeremy Feigelson or the law firm of Debevoise & Plimpton?

5. Have your or any member of your family currently or in the past ever been employed by Attorney Richard Farrier or the law firm of Nelson, Mullins, Riley & Scarborough?

6. Have your or any member of your family currently or in the past ever been employed by Attorney Jeremy Feigelson or the law firm of Debevoise & Plimpton?

7. Do you know any of the following attorneys?

- (a) Frank Cisa
- (b) Richard Farrier
- (c) Jeremy Feigelson

8. Do you know the plaintiff Richard Davis or anyone employed with plaintiff Trademark Properties? If yes, please explain the nature and extent of the relationship.

9. Have you or any member of your family ever been employed by, represented by or done business with Richard Davis, Trademark Properties, or any agents employed by Trademark Properties? If yes, please explain the nature and extent of the relationship.

10. Do you know any of the following witnesses who may testify at the trial of this case? If yes, please explain the nature and extent of the relationship.

- a. Richard Davis
- b. Ginger Alexander
- c. Robert Bass
- d. Tom Whaley
- e. John Davis

- f. Art Bell
- g. Nancy Dubuc
- h. Michael Morrison
- i. Max Weissman
- j. Dina Traugot
- k. Charles Nordlander
- l. Melinda McLaughlin
- m. Tom Moody
- n. Andrew Lemaire
- o. Pierre Brogan
- p. Bryan Geers
- q. Dawn Nosal
- r. Mark Halloran
- s. Roy Strickland

11. Have you ever watched the television show "Flip this House" on A&E? If so, how often have you watched the show? Do you consider yourself a fan of the show? A fan of Richard Davis? A fan of Ginger Alexander?

12. Have you ever watched the television show "The Real Estate Pros" on The Learning Channel? If so, how many episodes have you watched or how often do you watch the show? Do you consider yourself a fan of the show?

13. Have you seen or read any media coverage of this lawsuit? If so, please explain in detail -- what do you know about this suit and where did you learn this information?

14. Have you ever been a litigant in a civil lawsuit, either as a plaintiff or a defendant? If so, explain when the suit started, the basic allegations in the suit, and how the suit was resolved.

15. If not listed on your juror questionnaire, have you or any member of your immediate family ever been employed in the entertainment industry, including employment with a television network? If so, explain the nature and extent of the employment.

16. If not listed on your juror questionnaire, have you or any member of your immediate family ever appeared on a television show? If so, please name the show, describe your role on the show, and state the amount, if any, you were paid to be on the show.

17. Have you or anyone in your immediate family ever submitted an idea for a television show to a television network or anyone in the entertainment industry? If so, please explain the idea, identify the party to whom you submitted the idea, and explain what happened to the idea.

18. Have you or any member of your immediate family ever worked in the real estate industry, for example, as a real estate agent or a real estate developer? If so, explain the nature and extent of the employment.

19. A&E Television Networks is based in New York City, Trademark Properties is based in James Island, South Carolina and Richard Davis resides in Charleston, South Carolina. Do you feel you can be fair to a New York corporation in a suit brought by a South Carolina corporation and a South Carolina resident?

20. Have you or any member of your family ever been involved in a business dispute over an oral agreement, or an alleged oral agreement? If so, explain the nature of the dispute, your involvement, and the nature of the alleged oral agreement.

21. Are you a fan of reality shows?

Dated: October 27, 2008
Charleston, South Carolina

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

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