

9 Sample **Voir Dire** Questions

For trial lawyers, the goal of the voir dire process is to ensure that no members of the jury are harboring any biases that could jeopardize the outcome of the case.

Use these sample voir dire questions as starting points for your next trial to help uncover biases in potential jurors:

- How many of you have feelings against personal injury lawsuits, based on experiences, things you've read or heard, opinions, feelings or beliefs, some level of distrust or dislike, for any reason?
- "Would it be fair to say, based on your feelings and beliefs against personal injury lawsuits, that we may be starting out with a strike against us in spite of your best efforts to put those feelings aside?"
- "Would it be fair to say that you would have a leaning of the mind, in spite of your best efforts to put those feelings aside?"
- "Would it be fair to say that you could not assure the court you could be completely fair and impartial? You'd try your best, but your beliefs may still impact you?"
- "By raising your hand did you mean to say, like Mr. Jones said, you too cannot assure the court you could be completely fair and impartial?"
- "Would you have some difficulty believing large companies put profits over people?"
- "Could you easily put aside the fact your wife is a doctor and recognize that sometimes doctors forget to warn their patients about the known risks of a surgery?"
- "Would you strongly agree that corporate executives generally get paid too much in compensation?"
- "As a mother to young children, might you have some trouble finding that a mother who was out of work made a wrong decision by leaving her child unattended while she went to a job interview?"