

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**MEDIDATA SOLUTIONS, INC. AND  
MDSOL EUROPE LIMITED,**

Plaintiffs,

**V.**

**VEEVA SYSTEMS INC.,**

Defendant.

Civil Action No. 1:17-cv-00589-LGS-RWL

Hon. Lorna G. Schofield

**JOINT PROPOSED *VOIR DIRE* QUESTIONNAIRE**

## **Instructions**

To Prospective Jurors:

Please complete the following questionnaire to assist the Court and counsel in selecting a jury to serve in the case of Medidata Solutions, Inc. and MDSOL Europe Limited (collectively, “Medidata”) v. Veeva Systems Inc. (“Veeva”).

Please read the instructions on this page carefully and then complete the following questionnaire. Please print your answers clearly in blue or black ink. Do not leave any questions unanswered. Your answers are confidential and they will be seen only by the judge and the attorneys for this case; your answers will not be shared with any other members of the jury panel. Complete written answers will save the Court, parties, and prospective jurors a great deal of time. If a question asks you to “explain,” you must describe the circumstances or other details pertaining to your answer. You may not have enough room after the question to provide the best answer. If you need additional room, there are extra lines at the end of the questionnaire or you may write in the margins. Complete and detailed answers may avoid further follow-up questions later in the process. Please do not write on the back of any sheet.

It is very important that the answers be yours and yours alone. You must fill out this questionnaire by yourself and without consulting any other person. Please do not discuss the questions or your answers with anyone. Please do not do any online research or post online about anything related to this case during the questionnaire and jury selection process.

Remember that there are no “right” or “wrong” answers, only honest answers. You must sign this questionnaire, and your answers will have the same effect as a statement made under oath to the Court. Thank you for your time and effort in completing this questionnaire.

## Juror Questionnaire

1. Juror # \_\_\_\_\_ Name \_\_\_\_\_ Age \_\_\_\_\_ Gender \_\_\_\_  
City/Area of Residence \_\_\_\_\_ How long have you lived there? \_\_\_\_\_

2. What is your highest level of education?  Less than high school

High school graduate/G.E.D.       Trade/Tech School       Some college

Associate degree     College graduate     Post-grad/Masters     Ph.D/M.D./J.D./Doctorate

Degrees: \_\_\_\_\_ Major areas of study: \_\_\_\_\_

3. Marital status:  Married  Divorced/Separated  Widowed  Single  Live with partner

4. What is your current job status?

Full Time     Part Time     Retired     Homemaker     Unemployed     Student

Most recent employer: \_\_\_\_\_ Years worked from: \_\_\_\_\_ to: \_\_\_\_\_

What is your job title and duties? \_\_\_\_\_

What other jobs/occupations have you had? \_\_\_\_\_

5. If you have a spouse/significant other, what is their current job status?

Full Time     Part Time     Retired     Homemaker     Unemployed     Student     N/A

Current employer: \_\_\_\_\_ Job title & duties: \_\_\_\_\_

6. Please mark if you have or if anyone you know well has any specialized training or other experience (from work, business experience, or education) in any of the following areas. Please explain below for each item you mark.

Accounting                       Economics                       Law                                   Sales

Software                           Healthcare                       Product development

Contracts                         Engineering                       Clinical research / clinical trials

Computer Programming     Software-as-a-Service     Cloud-based computing

Other Technology-based fields

If you marked any, please explain: \_\_\_\_\_

7. Have you ever negotiated contracts as part of your job?  Yes  No. If yes, please explain:

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8. List the age, gender, and occupation of your children and/or step-children:

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9. Do you or anyone close to you, or anyone in your family have any legal experience or training?  Yes  No. If yes, please explain:

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10. Can you read, write, and speak the English language fluently?  Yes  No

11. Have you, anyone close to you, or anyone in your family ever owned a business?

Yes, currently  Yes, in the past  No. If yes, please explain: \_\_\_\_\_

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12. Have you, a family member, or close personal friend ever been involved in a lawsuit?

Yes  No. If yes, who was involved in the lawsuit?  Myself  Family member  Friend

Was it a:  civil case or  criminal case? If it was a civil case, were you or your friend/family

a:  plaintiff (the person suing),  defendant (the person being sued), or  a witness?

Please provide a brief description of the case(s):

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13. Have you ever served on a jury before?  Yes  No

If yes, did you reach a verdict?  Yes  No. If yes, were you the foreperson?  Yes  No

What type(s) of case(s)? \_\_\_\_\_

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14. Have you, anyone close to you, or anyone in your family ever signed a non-disclosure or confidentiality agreement that requires you or the family member to keep certain information confidential as part of your employment or as part of a contract?

Yes, and didn't want to  Yes, and thought it was fine  No.

If yes, please explain: \_\_\_\_\_

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15. Do you have strong feelings about, or significant experience with, non-disclosure, confidentiality, or non-competition agreements?  Yes  No. If yes, please explain:

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16. Have you, anyone closer to you, or anyone in your family ever left a company to work for a competitor company?  Yes  No. If yes, please explain, including if there was any type of legal dispute over the job change:\_\_\_\_\_

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17. Do you believe that employees should be able to save and store workplace documents on their personal electronic devices?  Yes  No.

If yes, please explain: \_\_\_\_\_

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18. **Plaintiffs Propose** Do you know what a trade secret is?  Yes  No]

19. Have you, anyone close to you, anyone in your family, ever been involved in any dispute regarding the copying or taking of confidential information or trade secrets?  Yes  No.

If yes, please explain: \_\_\_\_\_

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20. Have you, anyone close to you, or anyone in your family ever worked for a company involved in any dispute regarding the copying or taking confidential information or trade secrets?  Yes  No. If yes, please explain: \_\_\_\_\_

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21. Have you, anyone close to you, or anyone in your family ever worked at a job where you or they were involved with software called Medidata Rave or Veeva Vault?  Yes  No.

If yes, please explain: \_\_\_\_\_

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22. Have you heard, read, or seen anything about this case?  Yes  No. If yes, please explain:

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23. Do you presently have or have you ever had a direct or indirect financial interest in any of the following companies?

- a. Medidata?  Yes, currently  Yes, previously  No, never
- b. Dassault Systèmes?  Yes, currently  Yes, previously  No, never
- c. Veeva?  Yes, currently  Yes, previously  No, never

24. Have you, anyone close to you, or anyone in your family ever worked for or had any business dealings with any of the following companies, or anyone who works for the following companies?

- a. Medidata?  Yes  No
- b. Dassault Systèmes?  Yes  No
- c. Veeva?  Yes  No

If yes, please explain: \_\_\_\_\_

25. Have you, anyone close to you, or anyone in your family had a positive or negative experience with, or have a positive or negative opinion about, any of the following companies?

- a. Medidata?  Yes  No
- b. Dassault Systèmes?  Yes  No
- c. Veeva?  Yes  No

If yes, please explain: \_\_\_\_\_

26. One of the companies in this lawsuit is a subsidiary of a company headquartered outside the United States. Do you have a positive or negative opinion about companies who are not headquartered in the United States?  Yes  No. If yes, please explain: \_\_\_\_\_

27. Please review the lists of individuals and law firms identified in Exhibit A and Exhibit B at the end of this questionnaire. If you know any of the individuals or law firms listed on these two exhibits, please circle the names of those you know.

28. Are you taking any medication that could affect your ability to serve?  Yes  No

If yes, please explain: \_\_\_\_\_

29. Do you have any physical issues (for example, with your sight or hearing) that would interfere with your ability to serve?  Yes  No. If yes, please explain: \_\_\_\_\_

30. This trial is likely going to take two weeks. Would serving on this jury create any extreme personal or financial hardship for you?  Yes  No. If yes, please explain: \_\_\_\_\_

30. Is there any other reason why you think you could not or should not serve on this jury and render a fair verdict based solely on the evidence presented during trial and the Court's instructions on the law?

Extra lines for answers (please include the corresponding question number):

**VERIFICATION**

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING RESPONSES I HAVE GIVEN ON THIS QUESTIONNAIRE ARE TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

\_\_\_\_\_  
Juror Signature

\_\_\_\_\_  
Date

**EXHIBIT A**

**Alphabetical List of Attorneys**

Luke Apfeld  
Patrick Arnett  
Kevin Bruno  
Patricia Carson  
Andrew Hambelton  
Christopher Ilardi  
Lisa Lawson  
Scott Lawson  
Eric Loverro  
Joseph A. Loy  
Reid Mullen  
Divya Musinipally  
Matthew Owen  
Erin Quick  
Jay Rapaport  
Claudia Ray  
Benjamin Rothstein  
Yosef J. Riemer  
Khari Tillery  
Molly Villagra  
Jason Wilcox  
Benjamin Yaghoubian

**Alphabetical List of Law Firms**

Blank Rome LLP  
Keker, Van Nest & Peters LLP  
Kirkland & Ellis LLP  
Lawson + Lawson LLP

**EXHIBIT B**

**Alphabetical List of Witnesses**

Julian Ackert  
Tim Cabral  
Jim Davies  
Glen de Vries  
Avril England  
Drew Garty  
Rachel Giusti  
Jennifer Goldsmith  
David Hall  
Lisa Halsey  
Walter Hauck  
Nitza Hauser  
Brian Longo  
Michelle Marlborough  
Alan Mateo  
Wendy Morahan  
Sondra Pepe  
Robyn Perry  
Jason Rizzo  
Tobias Schaefer  
Jenson So  
Perry Steinberg  
Scott Sumner  
Anthony Tsai  
Wayne Walker  
Michael Wendell  
Richard Young