

**STATE OF MICHIGAN
IN THE WAYNE COUNTY CIRCUIT COURT
CRIMINAL DIVISION**

THE PEOPLE OF THE STATE OF MICHIGAN.
Plaintiff,

-vs-

Case No.
Hon. Vera Massey Jones

JOHN DOE,
Defendant.

_____/

WILLIAM J. WINTERS III (P35975)
Attorney for Defendant
32401 Eight Mile Road
Livonia, Michigan 48152
(313) 510-3316
WAYNE COUNTY PROSECUTORS OFFICE
Attorney for Plaintiff

_____/

DEFENDANT’S MOTION FOR LIMITED ATTORNEY VOIR DIRE

NOW COMES Defendant, _____ by his attorney, William J. Winters III and in support of his Motion for Limited Attorney Voir Dire states:

1. Defendant is charged with first-degree murder and felony firearm.
2. Jury trial is scheduled to commence July 9, 2012.
3. MCR 2.412(C)(2) provides that “the court may conduct the examination of the prospective jurors **or permit the lawyers to do so.**”
4. Because of the complicated nature of the charges and the circumstances involved it is essential that the lawyers be granted a brief period of time to question the prospective jurors.
5. Permitting the lawyers to question the individual jurors would expedite the jury selection process. Moreover, the interests of justice would be served if the lawyers were given twenty minutes each to question the prospective jurors.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that this Court grant his Motion for Limited Attorney Voir Dire and allow the lawyers to voir dire the prospective jurors for a maximum of twenty minutes each.

If this Honorable Court denies this Motion, Defendant proposes the following general voir dire questions:

1. City or Township of residence. Length of residence. Own or rent. Ever lived in another country.
2. Age, marital status, children
3. Occupation, supervisor or manager, technical or scientific material review in employment.
4. Education, spouse's education
5. Spouse's occupation and education.
6. Prior jury service. Foreperson?
7. Civic, fraternal, professional or community organizations?
8. Newspaper, magazine, television, internet reading and viewing habits?
9. Military service, law enforcement service or acquaintance in law enforcement.?
10. Previous court experience: witness, victim or defendant?
11. If told to deliberate now, what verdict?
- 12 (Use your imagination and creativity to craft questions pertaining to your case)

June 18, 2012

Respectfully submitted,

Attorney for Defendant

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