February 18, 2025

**Re: 21-cv-06216, *Sheirys* *Bredemeier v. Douglas Collins, Secretary of the United States Department of Veterans Affairs***

Dear Prospective Juror:

Welcome to the United States District Court for the Northern District of Illinois. Our system of justice depends on fair and impartial juries, and I thank you for your willingness to serve as a juror.

Once you have been seated in the courtroom, I will describe the nature of this case and introduce you to the people involved in this trial. I will then ask questions concerning your qualifications to serve as a juror in this case. These questions are intended to focus on your ability to be an objective and fair juror in this case. Honesty and candor are crucial to selecting a fair and impartial jury.

General Background Questions. The questioning process will start with general background questions. I will seat a subset of the venire, that is, the group of prospective jurors, in the jury box. Each prospective juror in the jury box will have a chance to answer the following general background questions. I will ask follow-up questions as appropriate. Everyone in the courtroom will be able to hear your answers to these questions. If at any time you believe a question implicates sensitive subject matter, feel free to ask to be heard at sidebar, which is an opportunity to be heard only by me, my staff, and the lawyers. The rest of the courtroom will not hear what is said at sidebar; however, as with all proceedings in my courtroom, a written record of what is said is kept by my court reporter.

1. Please state your name.
2. What city do you live in?
3. If you have lived in that city less than five years, please identify any other cities you have lived in during that period.
4. Do you own or rent your residence?
5. How far did you go in school?
6. What degrees, if any, do you have?
7. Please state your employment history for the last five years.
8. If currently employed, please provide a general description of your job responsibilities.
9. Have you served in the military?
10. If so, what branch and when?
11. Do others live in your household?
12. If so, please identify them and their relationship to you.
13. For adults in your household, please provide whether they are employed and, if so, the type of work that they do.
14. What are some of your hobbies or major interests?
15. Where do you get your news?
16. Have you ever served on a jury before?
17. If so, was it a civil case, criminal case, or a grand jury?
18. Did that jury reach a verdict? (Please do not say what the verdict was.)

Additional Questions. After each prospective juror in the jury box answers the general questions, I will then ask each prospective juror to review the following questions. I will also read the questions aloud. If the answer to one or more of the following questions is “yes,” please raise your hand when I ask the prospective jurors in the jury box whether the answer to any of the following questions is yes. For each prospective juror who raises their hand, I will ask follow-up questions at sidebar. My first question at sidebar will be, “which question or questions did you answer ‘yes’ to?” Feel free to bring this letter with you to sidebar.

1. Have you, someone in your immediate family, a member of your household, or a close friend ever been employed by the Department of Veterans Affairs?
2. Have you, someone in your immediate family, a member of your household, or a close friend ever received medical care from the VA?
3. Have you, someone in your immediate family, a member of your household, or a close friend ever made a formal complaint about a coworker or supervisor?
4. Have you, someone in your immediate family, a member of your household, or a close friend ever filed a charge of discrimination with the Equal Employment Opportunity Commission (EEOC) or any state equivalent?
5. Have you, someone in your immediate family, a member of your household, or a close friend ever been requested a reasonable accommodation for a disability?
6. Do you, someone in your immediate family, a member of your household, or a close friend have experience or training in the field of human resources?
7. Have you, someone in your immediate family, a member of your household, or a close friend ever sued their employer?
8. Have you, someone in your immediate family, a member of your household, or a close friend ever been sued by a former employee?
9. Do you hold any philosophical, religious, or other beliefs that would prevent you from sitting in judgment of another person?
10. Have you, someone in your immediate family, a member of your household, or a close friend ever been involved in a lawsuit or a criminal case as a party or a witness?
11. Do you have any impediment, problem, or issue that would make serving as a member of this jury difficult or impossible?
12. Is there some other matter that, in your judgment, could (or would) adversely affect your ability to serve as a juror in this case?
13. I will now read a list of names. Do you recognize any of the names that I read?

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JEREMY C. DANIEL

United States District Judge