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**FIFTH JUDICIAL DISTRICT COURT – CEDAR CITY
IRON COUNTY – STATE OF UTAH**

DAVID HINSON,

Plaintiff,

v.

DARRELL L. WILSON, M.D.; JARED C.
COX, D.O.; KIMBERLY D. HAYCOCK, P.A.;
IHC HEALTH SERVICES, INC.; IHC
HEALTH SERVICES INC. dba CEDAR CITY
HOSPITAL; JEFFREY L. BLEAZARD, M.D.;
and DOE INDIVIDUALS 1 through 10; and
ROE ENTITIES 1 through 10, inclusive,

Defendants.

**DEFENDANTS' PROPOSED JURY
QUESTIONNAIRE QUESTIONS**

Case No. 170500085

Judge Jeffrey C. Wilcox

Defendants hereby submit the following Proposed Jury Questionnaire Questions, attached hereto as Exhibit A.

DATED this 1st day of September 2023.

CAMPBELL HOUSER FERENCE & HALL

/s/ Vaun B. Hall

VAUN B. HALL

CAMERON BEECH

Attorneys for Darrell L. Wilson, M.D.

DATED this 1st day of September 2023.

KIPP & CHRISTIAN

/s/ Nan Bassett (with permission)

NAN BASSETT

*Attorney for Jared Cox, D.O. and Kimberly D.
Haycock, PA*

EXHIBIT A

Defendants' Proposed Jury Questionnaire Questions

Please do not discuss this Questionnaire or your answers with anyone. It is very important that the answers be yours and yours alone. Remember that there are no "right" or "wrong" answers; only truthful answers. You are sworn to give true and complete answers to all questions. Your answers to this Questionnaire will not be made public.

Section 1: (Juror Information)

1. Full name:
2. Juror number: _____ (This can be found on the Juror Qualification Form you previously submitted or you may email cedarjury@utcourts.gov and it will be sent to you).
3. If someone else helped you fill out this form, please write that person's name below and explain the reason. If this does not apply, please go to the next question.

Section 2: (Prospective Juror Background)

4. Are you a citizen of the United States? Yes No
5. Are you over the age of 18 years? Yes No
6. Are you able to speak, read, and understand the English language? Yes No
7. Are you a resident of Iron County, at the present time? Yes No
8. Have been convicted of a felony that has not been expunged? Yes No
9. Are you suffering from a physical or mental disability that makes you unable to serve as a juror?
 Yes No

If yes, please explain:

10. Are you taking any medications that would affect your ability to serve as a juror? Yes No

11. What city do you currently live in? _____

12. What is your gender? Male Female Other

13. What is your current relationship status?

Single Married/Engaged Domestic Partner Divorced Separated Widow/Widower

14. What is your current employment status?

Full time Retired
 Student

Part-time
 Disabled
 Unemployed

Self-employed Homemaker
 Veteran

15. What is your occupation? OR If you are retired, what did you do for a living?

16. Where do you currently work?

17. Will you suffer any severe financial hardship if selected to serve as a juror for approximately 15 days? Yes No

If yes, please explain:

18. What is your spouse or partner's occupation? OR If they are retired, what did they do for a living?

19. Where does your spouse or partner currently work?

20. Do you have children? Yes No If so, how many and what are their ages?

21. Do you have children at home who require your direct supervision? Note: only answer "yes" if there is no one else in the household who can provide care during your jury service. Yes No

22. What is the highest level of formal education you have completed? (check one) Less than High School

High School Diploma/GED
 Some College (but no degree)
 Associate's or Technical Degree (Major:) Bachelor's Degree (Major:) Graduate Degree (Major:)

23. Have you ever served on a jury before? Yes No
If so, briefly describe: When? Type of case? Result? Were you the foreperson?

24. Other than a divorce action, have you ever been a party, witness or victim in a trial or a lawsuit?
 Yes No

If so, briefly describe: When? Type of case? Result?

Section 3: (Case Specific Questions)

25. Do you have any formal legal training? Yes No If so, briefly explain:

26. Have you, or has anyone in your family had an unsatisfactory experience with a court, attorney, or the justice system? Yes No

If so, briefly explain:

27. Have you, or has anyone in your family had a good reason to file a lawsuit but decided not to? Yes No

If so, briefly explain:

28. Do you have any formal medical training? Yes No If so, briefly explain:

29. Are you, a member of your family, or any of your friends, employed in a medical profession? Yes No

If so, briefly explain:

30. Have you or a family member ever suffered an injury as a result of an accident or a medical procedure? Yes No

If so, please explain:

31. Do you hold a belief, or opinion, that healthcare providers are sued more frequently, or less frequently, than they should be? Yes No

If so, please explain:

32. Have you ever been treated by Darrell Wilson, MD, Jared Cox, DO, or Kimberly Haycock, PA? Yes No

If so, please identify which health care provider:

33. Have you, a member of your family, or any of your friends, suffered nerve damage following an orthopedic injury? Yes No

If so, please explain:

34. Do you have any special knowledge of the standards of medical care required of emergency room medical professionals in the treatment of an orthopedic injury? Yes No

If so, please explain:

35. Do you have strong feelings, either positive or negative, that there are too many lawsuits?

Yes No

If so, please explain:

36. Do you have strong feelings, either positive or negative, towards parties who sue other parties?

Yes No

If so, please explain:

38. Do you have strong feelings, either positive or negative, towards parties who are sued? Yes No

If so, please explain:

39. Do you feel money damages awarded in civil lawsuits are: too high, too low, just about right, no opinion?

40. Do you hold a belief, or opinion, that it is inappropriate to compensate a person for their emotional distress, and/or physical pain and suffering, with money? Yes No

If so, please explain:

41. If properly supported by evidence, could you render a verdict in favor of the plaintiff and award money damages? Yes No

42. If properly supported by evidence, could you render a verdict in favor of the defendant and thereby award nothing to a plaintiff? Yes No

43. Do you hold a religious, philosophic, or other belief that you think would make it difficult for you to serve as a juror in a case such as this? []Yes []No

If so, please explain:

44. Is there any reason why you may not be able to be a fair and impartial juror? [] Yes [] No If so, please explain:

45. Will you be able to follow the legal instructions given to you by the judge, regardless of your opinions about what the law should be, even if the legal instruction conflicts with your own beliefs? [] Yes [] No

46. Do you know any of the following?

Ashton Hyde

Vaun Hall

Nan Bassett

Kirk Gibbs

Senior Judge Jeffery Wilcox

Plaintiffs Witnesses (TBD following pretrial disclosures)

Defendants' Witnesses (TBD following pretrial disclosures)

I declare under criminal penalty under the law of Utah that the foregoing is

Signature: _____ (Please type your name, which will qualify as your signature)

Date: _____

CERTIFICATE OF SERVICE

On this 1st day of September 2023, I delivered, by the method indicated below, a true and correct copy of the foregoing **DEFENDANTS' PROPOSED JURY QUESTIONNAIRE QUESTIONS** to the following:

| | |
|---|---|
| <input type="checkbox"/> VIA FACSIMILE <input type="checkbox"/> VIA HAND DELIVERY <input type="checkbox"/> VIA U.S. MAIL <input checked="" type="checkbox"/> VIA COURT'S E-FILING SYSTEM | Ashton J. Hyde John M. MacFarlane Jayden G. Gray YOUNKER HYDE MACFARLANE 257 East 200 South, Suite 1080 Salt Lake City, UT 84111 <i>Attorneys for Plaintiff</i> |
| <input type="checkbox"/> VIA FACSIMILE <input type="checkbox"/> VIA HAND DELIVERY <input type="checkbox"/> VIA U.S. MAIL <input checked="" type="checkbox"/> VIA COURT'S E-FILING SYSTEM | Nan Bassett KIPP & CHRISTIAN 257 East 200 South, Ste 600 Salt Lake City, UT 84111 <i>Attorney for Jared Cox, D.O. and Kimberly D. Haycock, PA</i> |

/s/ Aly Stephenson

Aly Stephenson
Legal Assistant