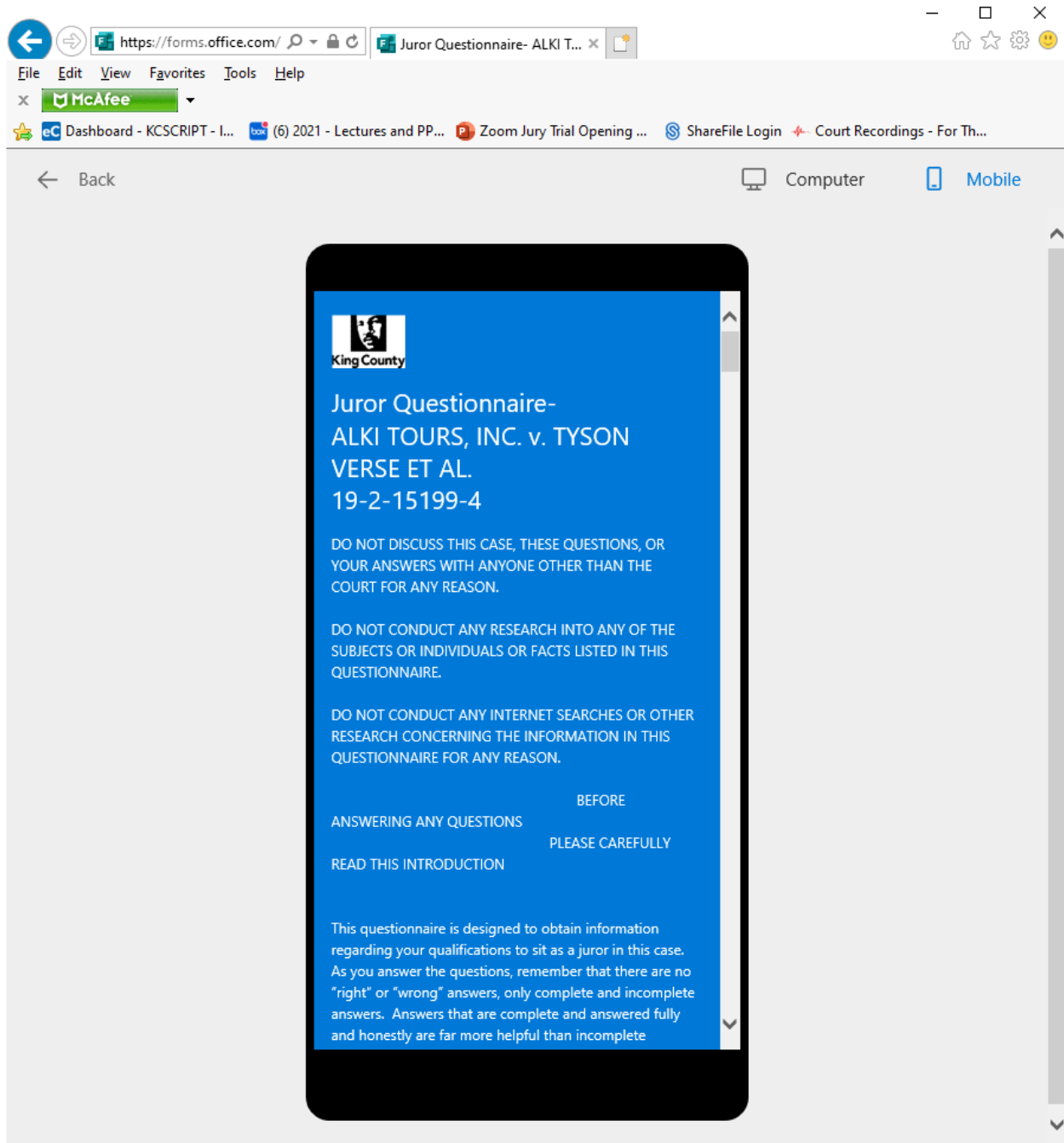


The first page shows smartphone use followed by the actual questionnaire.





King County

Juror Questionnaire-

ALKI TOURS, INC. v. TYSON VERSE ET AL. 19-2-15199-4

DO NOT DISCUSS THIS CASE, THESE QUESTIONS, OR YOUR ANSWERS WITH ANYONE OTHER THAN THE COURT FOR ANY REASON.

DO NOT CONDUCT ANY RESEARCH INTO ANY OF THE SUBJECTS OR INDIVIDUALS OR FACTS LISTED IN THIS QUESTIONNAIRE. DO NOT CONDUCT ANY INTERNET SEARCHES OR OTHER RESEARCH CONCERNING THE INFORMATION IN THIS QUESTIONNAIRE FOR ANY REASON.

BEFORE ANSWERING ANY QUESTIONS
PLEASE CAREFULLY READ THIS INTRODUCTION

This questionnaire is designed to obtain information regarding your qualifications to sit as a juror in this case. As you answer the questions, remember that there are no “right” or “wrong” answers, only complete and incomplete answers. Answers that are complete and answered fully and honestly are far more helpful than incomplete answers because those answers help shorten the time it takes to select a jury.

We have worked to reduce or eliminate any in-person appearance time by handling jury selection and trial by Zoom and via this electronic questionnaire.

Please answer “yes” to any question where you believe your response would be “yes” or “maybe”. A failure to disclose any of the requested information could impact the right to a fair trial for both the plaintiff and the defendant. You are under oath as you complete this questionnaire and your responses are made under penalty of perjury. You must not discuss questions or your answers with anyone, including any other prospective jurors, friends or family members. If anyone tries to discuss the questionnaire or case with you, please notify court staff immediately.

The answers to this questionnaire will help the court and the attorneys determine your qualifications to serve on this jury. Based on your answers to these questions, you may be excused without further participation if you qualify for a “hardship”. If you do not qualify for a “hardship”, you will be contacted to participate in jury selection via Zoom (or in-person based on your circumstances).

You must complete this questionnaire by 10:30 am on Monday January 11, 2021

We anticipate this second portion of jury selection to occur on JANUARY 12 or JANUARY 13, 2021 The trial for this case is expected to last through January 22, 2021

PLEASE ENTER N/A ON REQUIRED QUESTIONS THAT ARE NOT APPLICABLE TO YOU


* Required

JUROR BIOGRAPHICAL INFORMATION

THE FOLLOWING INFORMATION WILL BE USED FOR COURT PURPOSES ONLY. YOUR NAME WILL BE REDACTED FOR YOUR PRIVACY

1

Please enter your Juror Badge Number*



Jury service is a fundamental right, privilege and duty of living in a society governed by the rule of law. Courts and jury service are an essential function. We hope that you will find your jury service rewarding. By order of this Court, you are summoned to appear for a period of jury service not to exceed one trial. The jury selection for your trial is tentatively planned for the week of 8/10/2020 (Jury Selection will occur either in person or via Zoom, depending on your access to technology and the trial court's preference). **The trial itself** for which you are summoned is tentatively scheduled to begin as soon as possible after jury selection ends. **Do not appear at the courthouse until you have been directed to do so by the assigned trial judge (or their bailiff).**

YOUR CANDIDATE/BADGE NUMBER IS: 746492 YOUR GROUP NUMBER IS: 60

The trial may occur at the King County Courthouse, 516 Third Ave, Seattle, WA 98104, the Meleg Regional Justice Center, 401 4th Ave N, Kent, WA 98032 or the Meydenbauer Center, 11100 NE 6th St, Bellevue, WA 98004. **Do not appear in person until you have been directed to do so by your assigned trial judge (or their bailiff).**

INSTRUCTIONS – PLEASE READ CAREFULLY

STEP ONE: Review and complete the short questionnaire below. Your response is due no later than **UPON RECEIPT**, in one of three ways, 1) via our online portal <https://www.kingcounty.gov/courts/superior-court/juror-orientation.aspx> 2) by an email to JurorDutySEFA@kingcounty.gov or 3) by signed letter to King County Superior Court, 516 Third Ave, Room C203 Jury Dept, Seattle, WA 98104. Do **not** respond by telephone or text.

STEP TWO: If you are not excused after Step One, we will assign you to a trial judge. Before you report, your assigned trial judge (or their bailiff) will contact you for:

- Health screening.
- Regarding the length of the trial and whether that length would cause you undue hardship. If so, your assigned trial judge will decide whether you are excused or assigned to a different trial.
- You may also be asked to provide additional general information.
- **DO NOT REPORT IN PERSON** until directed to do so by your assigned trial judge.

STEP THREE: **Before** you report as directed by your assigned trial judge (or their bailiff), please review our online website, including the juror orientation videos. Your maximum juror obligation will be one trial. If you are dismissed by your assigned trial judge before jury selection, or if you participate in jury selection and are not selected for the jury, you will be excused from further participation for this jury term.

2

Please enter your Last Name (Family Name) *

3

Please enter your First Name*

4

Please enter your Middle Name (Or initial) *

5

What is your phone number?

6

What is your email address?

7

What city do you live in? *

8

What is your zip code? *

9

What is your age? *

10

How many years have you lived in Washington? *

11

How many years have you lived in King County? *

12

Where were you born? (City, State) ** If born outside of the US, please enter country. *

13

What is the highest degree or level of school you have completed? (If you're currently enrolled in school, please indicate the highest degree you have received.) *

- Less than a high school diploma
- High school degree or equivalent (e.g. GED)
- Some college, no degree
- Associate degree (e.g. AA, AS)

- Bachelor's degree (e.g. BA, BS)
- Master's degree (e.g. MA, MS, MEd)
- Professional degree (e.g. MD, DDS, DVM, JD)
- Doctorate (e.g. PhD, EdD)
- Prefer not to answer

14

Do you have children? *

- Yes
- No

15

If you answered yes to the previous question, list number of boy(s)/girl(s) and age(s): *

16

What category best describes you? Your answer to this question is required solely to avoid discrimination in juror selection and has absolutely no bearing on qualifications for jury service. In this way, the court can fulfill the policy of the State of Washington, which is to provide jurors who are randomly selected from a fair cross section of the community. *

- Asian
- Black or African American
- Caucasian
- Hispanic, Latino, or Spanish origin
- Middle Eastern or North African
- Native American or Alaska Native
- Native Hawaiian or Other Pacific Islander
- Some other race, ethnicity, or origin

Prefer not to answer

17

What is your gender? *

Female

Male

Non-binary

Prefer not to answer

18

Do you have access to and drive a car? *

Yes

No

19

What is your marital status? *

Single (never married)

Married, or in a domestic partnership

Widowed

Divorced

Separated

Prefer not to answer

20

Have you ever been convicted of a crime? *

Yes

No

21

If you answered yes to the previous question, please explain: *

22

What is your occupation or business? (State employer name) If unemployed or retired, state your prior occupation or business *

23

Have you ever been party to a lawsuit? (Plaintiff, Defendant, Petitioner, Respondent) *

Yes

No

24

Have you ever made a claim for injuries? *

Yes

No

25

Have you ever served on a jury? *

Yes

No

26

If yes, when? In which court? *

27

We need to understand the types of information that you are exposed to on a daily basis. Please list the occupations of each person who resides within your household. *

28

We need to understand how you learn about the world around you. Please describe where you get your news. *

Section 2

* Required

CASE SPECIFIC INFORMATION

This is a Civil Case brought by Alki Tours, Inc., Plaintiff against Tyson Verse Defendant. Plaintiff Alki Tours, Inc. was formed in 1994 by Third-Party Defendant Claire Nolan. Alki Tours is a tour operator based in Seattle, Washington. Defendant Tyson Verse worked as a tour guide for Alki Tours for approximately 20 years. On October 31, 2018, Mr. Verse resigned from Alki Tours to operate his own tour business. Alki Tours alleges that Mr. Verse misappropriated its trade secrets, breached an employee duty of loyalty, and intentionally interfered with prospective business relationships. Mr. Verse denies these claims. For his part, Mr. Verse alleges that Alki Tours failed to pay him all wages that were due from 2016 through 2018, and that Ms. Nolan made defamatory statements about Mr. Verse to certain of its clients. Alki Tours and Ms. Nolan deny Mr. Verse's claims.

29

Have you or a close friend or relative been a witness or involved in a similar type of case *

- Yes
- No

30

If you answered yes to the previous question, please describe: *

31

The parties in this case are: ALKI TOURS, INC., a Washington corporation, TYSON VERSE, RAIL AND SAIL VACATIONS, L.L.C., a Washington limited liability company, and CLAIRE NOLAN, Do you know any of the parties? (Plaintiffs or Defendants) *

Yes

No

32

If you know any of the parties, please state the names of the parties that you know, and how you know them. *

33

The Attorneys in the case are: Michael Hunsinger and Charles Rullman. Do you know any of the Attorneys in the case? *

Yes

No

34

If you know any of the attorneys, please state their names, and how you know them *

35

The following court staff will be conducting the trial in this case: Judge Matthew Williams Bailiff Lisa Zimnisky Clerk Lonnie Berger Do you know any of these people? *

Yes

No

36

If you answered yes to the previous question, describe how you know any of the court staff mentioned. *

37

Have you heard or read anything about this case? *

Yes

No

38

Describe what you have heard or read about this case. *

39

Are you, or any of your close friends or relatives connected or employed by: (check all that apply) *

A prosecutor or public defender's office

An attorney in private practice

The Court system

Any law enforcement or regulatory agency

Not applicable

40

For each box you checked, please describe the connection

41

Have you had a particularly negative or positive experience with a law enforcement officer? *

Yes

No

42

Please describe that positive or negative experience:

43

Have you worked in a business where the employees had access to important information that they knew the bosses would not want competitors to acquire?

- Yes
- No

44

If the answer to question 43 was yes, did that information include the identity of customers and/or other information about them

- Yes
- No
- N/A

45

If the answer to question 43 was yes, did you think it was important to keep that information from the competitors?

- Yes
- No
- N/A

46

If the answer to question 43 was yes, did you think you could use that information for your personal advantage while you worked for the company and/or after you left

- Yes
- No
- N/A

47

Do you agree that an employee should not secretly solicit their employer's customers to become customers of the employee's new competing business while continuing to work for the employer?

- Yes
- No
- Not sure

48

Do you agree that after an employee quits their job they should not use the employer's confidential customer information to attempt to have them become customers of the employee's competing business?

- Yes
- No
- Not sure

49

Should everyone have the opportunity to be their own boss?

- Yes
- No
- Not sure

50

Should an employee need permission from his or her boss in order to open their own business?

- Yes
- No

51

Are there circumstances when an employer should be allowed to stop an employee from starting his or her own business?

- Yes

No

52

Check all that apply:

- As an adult I have started my own business
- I quit a job to open that business
- When I started my business I was new to that line of work
- When I started my business I had previously worked in that industry
- I have made plans for a new job while working for a different employer
- I felt guilty about planning my next opportunity while still employed by someone else
- I felt that it was wrong to plan my next opportunity while being paid by a current employer
- I did NOT think it was wrong to plan my next opportunity while being paid by a current employer

53

If you started your own business, explain why you wanted to start that business.

54

Please check all that apply:

- When I need a haircut or tune up for my car, I should be able to hire whoever I want.
- If I got a great haircut, I would go back to the same barber/stylist for my next haircut
- If a mechanic did a poor job on my car, I would feel obligated to go back to that mechanic for my next service appointment

55

Check all that apply:

- I have taken a trip led by a tour guide

- I had a good experience on that trip.
- After my trip led by a tour guide, I stayed in touch with that guide.
- If my tour guide from that trip moved to a new company I should be allowed to hire that same guide for my next trip
- N/A

56

Should employers be allowed to require non-competition agreements?

- Yes
- No

57

Is it fair for a business to block competition from an employee who has not signed a non-competition agreement?

- Yes
- No

58

Should there be consequences for a business owner who falsely informs a client that an employee stole its client list?

- Yes
- No

59

Should someone be allowed to sue for damage to his or her business reputation if they cannot prove a financial loss?

- Yes
- No

60

Please check the name of any witness you know or think you recognize: *

- Michael Adams
- Susan Anda
- Lee Brumley
- Matthew Brumley
- Dawn Croke
- Jan Dawson
- James Clancy Devery
- James Dusek
- Linda Engebretson
- John Feld
- Patricia Frost
- Shirley Fullner
- Marjorie Garber
- Marlene Grandstrom
- Mary Gronholt
- Rick Hazen
- Lasse Hjorthen
- Marta Horvath
- Larry Miles
- Jayme Miller
- Michael Moore

- Doug Muse
- Glenda Negrones
- Ed Oyama
- Sheri Rosenburg
- Jim Paige
- Diana Phelps
- Mica Piper
- Douglas Prior
- Zoe Seda
- Seri Sedlacek
- Hillary St. Clair
- Gregory Taylor
- Molly Tomita
- Count Kody Tuwalestiwa
- I don't know any of them

Section 3

* Required

COVID-19 & HEALTH

Although it is unlikely that you will be required to physically come to the courthouse, your health and well-being are of the utmost importance. Therefore, please take a moment to answer the following questions.

61

Within the last 14-days, have you experienced a new cough that you cannot attribute to another health condition? *

Yes

No

62

Within the last 14-days, have you experienced new shortness of breath that you cannot attribute to another health condition? *

Yes

No

63

Within the last 14-days, have you experienced a new sore throat that you cannot attribute to another health condition? *

Yes

No

64

Within the last 14-days, have you experienced new muscle aches that you cannot attribute to another health condition or a specific activity such as physical exercise? *

Yes

No

65

Within the last 14-days, have you had a temperature at or above 100.4° or the sense of having a fever? *

Yes

No

66

Within the last 14 days, have you had close contact with someone who is currently sick with suspected or confirmed COVID-19?* (Note: *Close contact is defined as within 6 feet for more than 10 consecutive minutes) *

Yes

No

67

If your answer to the previous question is yes, please tell us how long ago? What relationship to you is the person who was infected? Have you been tested since? When was that test and what were the results? *

68

Do you fall into any of the high-risk categories for COVID-19 according to the CDC guides?

HIGH-RISK CATEGORIES, ACCORDING TO THE CDC:

COVID-19 is a new disease and there is limited information regarding risk factors for severe disease. Based on the currently available information and clinical expertise, older adults and people of any age who have serious and underlying medical conditions might be at higher risk for severe illness from COVID-19.

Based on what we know, those at high-risk for severe illness from COVID-19 are:

- People 65 years or older
 - People who live in nursing homes or long-term care facility
- People of all ages who have underlying medical conditions, particularly if not well controlled, including:
- People with chronic lung disease or moderate to severe asthma
 - People who have serious heart conditions
 - People who are immunocompromised
 - Many conditions can cause a person to be immunocompromised, including cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications
 - People with severe obesity (body mass index [BMI] of 40 or higher)
 - People with diabetes • People with chronic kidney disease undergoing dialysis
 - People with liver disease*



Yes

No

69

If so, please tell us what makes you high-risk? *

70

In the unlikely event that you might be asked to come to the Courthouse, is there any reason you cannot wear a facial covering, as required by the Seattle and King County Director of Public Health and the King County Superior Court, inside the courthouse during your jury service? *

Yes

No

71

If yes, please briefly explain: *

72

Given that you will be able to participate remotely, do you have any health concerns or conditions that would make it difficult for you to sit as a juror? *

Yes

No

73

Please briefly explain*

Section 4

* Required

TECHNOLOGY RELATED

74

Do you have a cell phone that is a “smart” phone, tablet, or another device that allows you to communicate by voice or video over the internet or via a cellular network? *

Yes

No

75

Do you own or have access to use any of the following devices (check all that apply) *

Smart Phone (Android or iPhone)

Tablet or Ipad

PC or Apple Computer with webcam

None of the Above

76

Jury selection and this trial will be conducted remotely via Zoom. If there is any reason that you would be unable to participate via Zoom or would need to appear at the Courthouse in person, please describe that reason here. *

77

Do you have internet access in your home or workplace? *

Yes

No

Section 5

* Required

HARDSHIPS

The trial for this case is expected to BEGIN no later than January 13, 2021 and may last through January 22, 2021. IF YOU ARE SELECTED TO BE A JUROR, YOU WILL NEED TO APPEAR VIA ZOOM DURING THE DATES OF TRIAL. Trial will be in session Monday through Thursday, 9:00 a.m. to 4:00 p.m., with a 90-minute break for lunch, beginning at noon, as well as several other breaks, during which those who can telecommute can get significant work done. At the conclusion of the trial, the jury will deliberate until a verdict is reached.

WHAT IS A "HARDSHIP"?

A "Hardship," means that serving on this jury would create a financial or medical hardship for you or your family that is more than merely inconvenient or unpleasant. We recognize that changing your schedule to serve on a jury may be inconvenient and require rearranging your daily plans.

"Hardship" does not include the impact your absence would have on your business or employer UNLESS it would financially impact YOU.

"Hardship" MAY include a medical procedure or an important event that cannot be rescheduled. The Court understands the difficulty that jury service, particularly jury service during the COVID-19 pandemic, may cause. The Court must have jurors, however, to perform its work. Jury service is your opportunity to put into practice the valuable constitutional right of trial by jury we all enjoy. We greatly appreciate your service.

78

With these explanations in mind, would serving during this time create a substantial hardship for you?

- Yes
- No

79

IF YOU ARE CLAIMING A HARDSHIP, PLEASE EXPLAIN: *

80

I, _____ (place initials only in the box below), declare under penalty of perjury that the foregoing answers to this Jury Questionnaire are true and correct to the best of my knowledge. *