

<b>THE STATE OF TEXAS,</b>	)	<b>40<sup>th</sup> DISTRICT COURT</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>ELLIS COUNTY, TEXAS</b>
<b>v</b>	)	
	)	
<b>TOMAS ANDRES XXXX,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION FOR JURY QUESTIONNAIRE**

Defendant, XXXX XXXX, hereby moves this Court to submit the attached questionnaire to the jury panel prior to *voir dire* in this case. In support of this motion, Mr. XXXX sets forth the following facts and argument.

As this Court is well aware, charges involving sexual assault often provokes strong feelings on the part of prospective jurors. Given the strong feelings that are particularly unique to charges involving sexual assault, it is particularly important to both the defendant and the state that the twelve members selected to serve on a jury involving such charges can be impartial both with regard to a defendant's guilt or innocence and with regard to any punishment that will be set if a defendant is convicted. Even more important, it is imperative for the parties to locate persons who have been sexually assaulted, or know people who have been sexually assaulted or know people who have been accused of sexual assault. By allowing a potential juror to provide this information by answer to the questionnaire, it will avoid the embarrassment of the juror having to answer these questions in front of other members of the venire panel.

Mr. XXXX respectfully submits to the Court that submitting a questionnaire to members of the jury panel in this case will assist *both* parties in selecting a fair jury. Using a questionnaire

will also likely reduce the amount of time the parties will need to conduct *voir dire* in this case and thereby save valuable court time and the time of jury panel members. In addition, the proposed questionnaire is short and will not take an inordinate amount of time for the panel members to complete and for the parties to review. Finally, no party will be prejudiced by the use of the jury questionnaire and Mr. XXXX is, of course, amenable to the state suggesting questions to be added to the questionnaire if it so desires.

WHEREFORE XXXX XXXX, hereby respectfully requests this Court to submit the attached questionnaire to the jury panel prior to *voir dire* in this case.

Respectfully submitted,

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Attorney for Defendant  
XXXX XXXX

**CERTIFICATE OF SERVICE**

I, F. Clinton Broden, do hereby certify that, on this 31<sup>st</sup> day of March, 2015, I caused a copy of the foregoing document to be served on Ellis County District Attorney's Office, 109 S Jackson St, Waxahachie, TX 75165 by first-class mail, postage pre-paid.

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F. Clinton Broden