

1 DAVIS WRIGHT TREMAINE LLP
Alonzo Wickers IV (Bar No. 169454)
2 alonzowickers@dwt.com
Diana Palacios (Bar No. 290923)
3 dianapalacios@dwt.com
Cydney Swofford Freeman (Bar No. 315766)
4 cydneyfreeman@dwt.com
865 South Figueroa Street, Suite 2400
5 Los Angeles, California 90017-2566
Tel: (213) 633-6800
6 Fax: (213) 633-6899

7 QUINN EMANUEL URQUHART & SULLIVAN, LLP
William C. Price (Bar No. 108542)
8 williamprice@quinnemanuel.com
Robert M. Schwartz (Bar No. 117166)
9 robertschwartz@quinnemanuel.com
865 South Figueroa Street, 10th Floor
10 Los Angeles, California 90017-2543
Tel: (213) 443-3000
11 Fax: (213) 443-3100

12 Attorneys for Defendants
Matt Duffer and Ross Duffer

13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF LOS ANGELES**
16

17 CHARLIE KESSLER, an individual,
18 Plaintiff,

19 vs.

20 MATT DUFFER, an individual; ROSS
DUFFER, an individual; and does 1 through 50
21 inclusive,

22 Defendants.

Case No. BC700197
[Assigned to the Hon. Michael Stern]

**DEFENDANTS' REVISED REQUESTED
VOIR DIRE QUESTIONS**

Trial Date: May 6, 2019
Action Filed: April 2, 2018

23 Pursuant to Los Angeles Superior Court Local Rule 3.50, defendants Matt Duffer and
24 Ross Duffer (the "Duffers") respectfully request that the Court ask the following additional voir
25 dire questions:

- 26 1. Have you ever worked in the entertainment industry, or has a family member or
27 close friend worked in the entertainment industry? If so, in what capacity?
28 2. Do you watch television? What types of shows? How often?

- 1 3. Do you watch science-fiction television?
- 2 4. Do you watch television dramas?
- 3 5. Do you watch procedural television shows like *Law and Order*?
- 4 6. Do you watch movies? What types of movies?
- 5 7. Do you have a subscription to a media streaming service, like Netflix?
- 6 a) Has anyone had a negative experience with Netflix or made a complaint to
- 7 Netflix?
- 8 b) If yes, briefly, what was the nature of the complaint and was it resolved to your
- 9 satisfaction?
- 10 8. Have you seen *Stranger Things*?
- 11 a) How many of you have **never** seen *Stranger Things*?
- 12 9. What have you heard about *Stranger Things*?
- 13 10. Have you ever heard of any urban legends out of Montauk, New York?
- 14 11. Have you ever heard of the Duffer Brothers? What have you heard?
- 15 12. Have you ever heard of Charlie Kessler? What have you heard?
- 16 13. Have you ever heard about this lawsuit? What have you heard?
- 17 14. Have you ever been to a film screening?
- 18 15. Have you ever been to an entertainment industry party?
- 19 16. Have you ever written or created something that you consider to be a literary work,
- 20 work of art or other creative work? If so,
- 21 a) What did you create?
- 22 b) Can you describe the process of creating it?
- 23 c) What motivated you to create it?
- 24 d) Did you try to monetize your creation? If so, were you successful?
- 25 17. Have you ever felt that someone copied part or all of something that you
- 26 created? If so,
- 27 a) How did that person copy your creation?
- 28 b) What did you do when you found out he or she copied it?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

18. Have you or has someone close to you ever been accused of copying someone else's a literary work, work of art or other creative work? If so,

- a) What was the nature of the accusation?
- b) How was it resolved?

19. Have any of you ever considered suing someone, but for some reason decided not to? If yes, briefly, tell me what the situation was and why you decided not to sue.

Dated: April 30, 2019

DAVIS WRIGHT TREMAINE LLP
Alonzo Wickers IV
Diana Palacios
Cydney Swofford Freeman

QUINN EMANUEL URQUHART
& SULLIVAN, LLP
William C. Price
Robert M. Schwartz

By: William C. Price^{ICSF}
William C. Price

Attorneys for Defendants
Matt Duffer and Ross Duffer

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18
3 and not a party to the within action. My business address is Davis Wright Tremaine LLP, 865
4 South Figueroa Street, Suite 2400, Los Angeles, California 90017-2566.

5 On April 30, 2019, I caused to be personally served the following document:
6 **DEFENDANTS' REVISED REQUESTED VOIR DIRE QUESTIONS** by placing a **true copy**
7 in a separate envelope for each addressee named below, with the name and address of the person
8 served shown on the envelope as follows:

9 S. Michael Kernan kernanlaw@gmail.com
10 R. Paul Katrinak pkatrinak@kernanlaw.net
11 The Kernan Law Firm
12 9663 Santa Monica Boulevard Phone: (310) 490-9777
13 Suite 450 Fax: (310) 861-0503
14 Beverly Hills, CA 90210

15 by requesting that a messenger from **Apex Legal Services**, 611 Wilshire Blvd., Suite 700,
16 Los Angeles, CA 90017, deliver true copies of the above-named documents, enclosed in sealed
17 envelopes addressed indicated above.

18 I also caused to be served said document on all parties to this action listed above by
19 electronic service through First Legal contemporaneous with the electronic filing.

20 I declare under penalty of perjury, under the laws of the State of California, that the
21 foregoing is true and correct. Executed on April 30, 2019, at Los Angeles, California.

22
23
24
25
26
27
28

29 **Vicky Isensee**
30 Print Name

Signature