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Windermere Real Estate Services Company  
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13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 BENNION & DEVILLE FINE  
HOMES, INC., a California  
16 corporation, BENNION & DEVILLE  
FINE HOMES SOCAL, INC., a  
17 California corporation, WINDERMERE  
SERVICES SOUTHERN  
18 CALIFORNIA, INC., a California  
corporation,

19 Plaintiffs,

20 v.

21 WINDERMERE REAL ESTATE  
22 SERVICES COMPANY, a Washington  
corporation; and DOES 1-10  
23

24 Defendant.

25 AND RELATED COUNTERCLAIMS  
26  
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Case No. 5:15-CV-01921-DFM

Hon. Douglas F. McCormick

**DEFENDANT AND COUNTER  
CLAIMANT WINDERMERE REAL  
ESTATE SERVICES COMPANY'S  
PROPOSED VOIR DIRE**

Date: June 18, 2018

Time: 10:00 a.m.

Courtroom: 6B

Complaint Filed: September 17, 2015

1 Defendant and counterclaimant Windermere Real Estate Services Company  
2 respectfully proposes that the Court use the following additional questions during  
3 *voir dire* in this case with all appropriate follow up questions:

- 4 1. Have you or a family member or close friend ever sold franchises?
- 5 2. Have you or a family member or close friend ever owned a franchise?
- 6 3. Are you familiar with the franchise concept?
- 7 4. Have you or a family member or close friend ever owned a business?
- 8 5. Have you or a family member or close friend ever worked as a debt  
9 collector?
- 10 6. Have you ever had difficulty obtaining payment from a third party who  
11 owed money to you or your company?
- 12 7. Have you or a family member or close friend ever had to deal with a  
13 negative review on Yelp or other similar forum?
- 14 8. Are you familiar with Search Engine Optimization?
- 15 9. Have you or a family member or close friend ever been employed as a  
16 real estate agent or broker?
- 17 10. Have you or a family member or close friend ever had a bad experience  
18 buying or selling real estate?
- 19 11. Do you have any negative feelings about out-of-state companies doing  
20 business in California?
- 21 12. Do you have any reason to believe that you could not be impartial in a  
22 case where one or more of the parties and/or their representatives are from Seattle,  
23 Washington?
- 24 13. How many of you believe that a business should pay its creditors  
25 before it pays itself or its owners?
- 26 14. How many of you believe that if you are not receiving the services you  
27 were promised or expected that you should make other arrangements for those  
28 services?

1           15. How many of you believe that if you are hired to provide services to  
2 third parties, you should treat each of those third parties the same?

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DATED: June 11, 2018

PEREZ VAUGHN & FEASBY INC.

By: /s/ Jeffrey A. Feasby  
Jeffrey A. Feasby  
Attorneys for  
Windermere Real Estate Services Company