

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 1:17-cv-00365-DAE-AWA
	)	
GRANDE COMMUNICATIONS	)	
NETWORKS LLC,	)	
	)	
Defendant.	)	

**DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S  
PROPOSED VOIR DIRE QUESTIONS**

Pursuant to Local Rule CV-16(e) and the Court's Order Setting Jury Selection/Trial and Related Deadlines (ECF No. 275), Defendant Grande Communications Networks, LLC ("Grande") respectfully submits the following proposed *voir dire* questions.

1. Have any of you heard or read anything about this case? What do you know?
2. I have provided you with a list of the plaintiffs in this case. Have you or anyone close to you ever worked for or had a business relationship with one of the plaintiffs?
3. I have provided you with a list of the attorneys and law firms who may be involved in the trial. Do you know, or know of, any of these attorneys or law firms?
4. I have provided you with a list of people who may testify or be mentioned at trial. Do you know, or know of, any of these people?
5. Has anyone worked for an internet service provider, or ISP? What did you do and for how long? What, if anything, did you not enjoy about working for an ISP?
6. Have any of you received internet, television or telephone service from Grande? If so, did you have a billing or service problem with Grande that was not resolved to your

satisfaction? Does anyone otherwise have a strong opinion about Grande, positive or negative? Please elaborate.

7. Does anyone here have someone close to them who has received internet, television, or telephone service from Grande? Was there anything memorable to them about their experience with Grande? Please elaborate.
8. Have you had a billing or service problem with an internet service provider that was not resolved to your satisfaction? Please elaborate.
9. In general, do you feel that the price of home internet service is too expensive, too cheap, or about right? (elicit raised hands for each)
10. In general, do you feel that the amount of competition among internet service providers is too little, too much, or about right? (elicit raised hands for each)
11. How many of you believe that ISPs should be monitoring what you do online, including what materials you download? If so, please explain what you believe ISPS should be doing and why.
12. Does anyone think that Congress should pass a law requiring internet service providers to monitor what their customers do online? Please explain why you think such a law should exist.
13. Does anyone here believe that it is the ISP's responsibility to monitor and police online copyright infringement? Please describe what you believe the ISP's responsibility is and why.
14. Has your internet service provider ever notified you that someone using your internet connection was accused of illegally downloading music, movies, or other content?
15. How many of you believe that people downloading music and other media without

paying for it is a very serious problem? Please elaborate. What do you think should be different?

16. Is anyone a musician or does anyone have someone close to them who is a musician? If so, have you or the other person had a recording contract with a record label?
17. If you are a musician, have you ever relied on performing or recording music for some or all of your income?
18. If you are a musician, have you ever felt that someone else was unfairly profiting from your work? If so, please explain.
19. Have you or anyone close to you worked for a record label?
20. Even if you haven't worked for a record label, does anyone otherwise consider themselves as having worked in the music industry? If so, please explain.
21. How many of you have heard of BitTorrent? How many of you believe that you have a general understanding of what BitTorrent is?
22. How many of you are very concerned about record labels being impacted by people downloading music without paying for it? Please describe your concerns.
23. Has anyone ever been accused of copyright infringement, either in a lawsuit or otherwise?
24. Does anyone own a copyright? If so, have you ever accused someone else of infringing your copyright, either by filing a lawsuit or otherwise? If so, please explain.
25. Have you ever been a plaintiff in a civil lawsuit? If so, were you satisfied with the outcome? Please explain.
26. Have you ever been a defendant in a civil lawsuit? If so, were you satisfied with the outcome? Please explain.

Dated: January 28, 2020

By: /s/ Richard L Brophy  
Richard L. Brophy  
Zachary C. Howenstine  
Margaret R. Szewczyk  
Abigail L. Twenter  
ARMSTRONG TEASDALE LLP  
7700 Forsyth Blvd., Suite 1800  
St. Louis, Missouri 63105  
Telephone: 314.621.5070  
Fax: 314.621.5065  
rbrophy@armstrongteasdale.com  
zhowenstine@armstrongteasdale.com  
mszewczyk@armstrongteasdale.com  
atwenter@armstrongteasdale.com

J. Stephen Ravel  
Texas State Bar No. 16584975  
J.R. Johnson  
Texas State Bar No. 24070000  
Diana L. Nichols  
Texas State Bar No. 00784682  
KELLY HART & HALLMAN LLP  
303 Colorado, Suite 2000  
Austin, Texas 78701  
Telephone: 512.495.6429  
Fax: 512.495.6401  
Email: steve.ravel@kellyhart.com  
jr.johnson@kellyhart.com  
diana.nichols@kellyhart.com

ATTORNEYS FOR DEFENDANT  
GRANDE COMMUNICATIONS  
NETWORKS LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 28, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

*/s/ Richard Brophy*

Richard L. Brophy