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8 *Counsel for Plaintiff*

9  
 10 **IN THE UNITED STATES DISTRICT COURT**  
 11 **FOR THE DISTRICT OF ARIZONA**

12 IN RE: Bard Implanted Port Catheter  
 Products Liability Litigation

MDL No. 3081

13 THIS DOCUMENT RELATES TO:

14 Robert Cook,

15 C.A. No. CV-23-1975-PHX-DGC

16 **JOINT PROPOSED VOIR DIRE**  
**QUESTIONS**

17 Robert Cook,

18 Plaintiff,

19 v.

20 Becton, Dickinson and Company, et al.,

21 Defendants.  
 22

23 Plaintiff Robert M. Cook and Defendants Becton, Dickinson and Company, C.R.  
 24 Bard, Inc., Bard Access Systems, Inc., and Bard Peripheral Vascular, Inc., through their  
 25 respective counsel, hereby submit the proposed set of voir dire questions as directed in  
 26 the Court's Case Management Order No. 44 (Doc. 6875).  
 27  
 28

1           1. Introduce self and staff: My name is Judge David Campbell. I am a United  
2 States District Court Judge. Kathy Ballard is my courtroom deputy clerk.  
3 \_\_\_\_\_ is the court reporter. My law clerks are  
4 \_\_\_\_\_ and Jeff Kilmark. My Judicial Assistant is Christine Boucher.  
5 Do any of you know me or any member of my staff on any basis, social, professional,  
6 or otherwise?

7           2. The Plaintiff is represented by Michael Sacchet and Megan Odom of Ciresi  
8 Conlin, Tom Pirtle of Laminack, Pirtle & Martines, and Gabriel Assaad of McDonald  
9 Worley. Counsel, please stand.

10           • Do any of you know Plaintiff's counsel, or any of the employees in their  
11 offices on any basis, social, professional, or otherwise?

12           • Counsel, please introduce your client and those present at the counsel table.  
13 Do any of you know these individuals on any basis, social, professional, or otherwise?

14           3. The Defendants are represented by Richard North and Elizabeth Helm of  
15 Nelson Mullins Riley & Scarborough, and Edward Fanning of McCarter English.

16           • Do any of you know the Defendants' counsel or any employees of their  
17 office on any basis, social, professional or otherwise?

18           • Counsel, please introduce your clients and those present at the counsel table.  
19 Do any of you know these individuals on any basis, social, professional, or otherwise?

20           • Have any of you ever had a business or employment relationship of any kind  
21 with the Defendants?

22           4. Do any of you know or think you might know any of the witnesses listed on  
23 the sheet that was given to you in the jury assembly room?

24           5. Ladies and gentlemen, we recognize that jury service is probably an  
25 inconvenience for you, taking you away from your jobs and families and disrupting your  
26 daily routine. Jury service is, however, one of the most important duties that citizens of  
27 this country can perform. For this reason, from time to time we ask citizens to make  
28 sacrifices and serve on juries, even when inconvenient. Prospective jurors can be

1 excused from jury service if the length of the trial or the daily schedule would impose  
2 undue hardship. By undue hardship I mean more than inconvenience – I mean genuine  
3 hardship that would be experienced by you or your family. This case is expected to last  
4 3 weeks. Would the length of the trial create an undue hardship for any of you?

5 6. Do any of you have any other reason whatsoever, such as a physical  
6 difficulty, a health problem or home problems that might interfere with your serving as  
7 a fair and impartial juror in this case?

8 7. Did any of you know each other before this morning?

9 8. Has anyone seen or heard anything since completing the questionnaire about  
10 this case or subject matter, including doing any research or being exposed to any  
11 information about this case?

12 9. Has anyone seen or heard anything since completing the questionnaire that  
13 changes any answer in their questionnaire?

14 10. Is there any answer in your questionnaire that is incorrect or in retrospect  
15 needs to be changed?

16 11. Is there any reason not identified in your questionnaire that would prevent  
17 you from serving on this case?

18 12. Does anyone own stock in Becton Dickinson & Co. (“BD”)?

19 13. This case involves medical care at the Mayo Clinic, though the Mayo Clinic  
20 is not a party to this case. Do you have any experiences, positive or negative, with the  
21 Mayo Clinic that you think would affect your ability to serve impartially in this case?

22

23 Dated: March 31, 2026

Respectfully submitted,

24 /s/ Richard B. North, Jr.  
25 Richard B. North, Jr.  
(Admitted Pro Hac Vice)  
26 Elizabeth C. “Kate” Helm  
(Admitted Pro Hac Vice)  
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