## EXHIBIT 1

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

UMG RECORDINGS, INC., et al.,	)
Plaintiffs,	)
vs.	)
GRANDE COMMUNICATIONS NETWORKS LLC,	) ) )
Defendant.	)

No. 1:17-cv-00365-DAE

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

Pursuant to Local Rule CV-16(f) and the Court's Order Resetting Jury Trial and Related Deadlines (ECF No. 386), 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 services from Grande? If so, did you have a billing or service problem with Grande that was not resolved to your

## Case 1:17-cv-00365-DAE Document 402-1 Filed 09/13/22 Page 3 of 5

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 internet service providers should be monitoring what you do online, including what materials you download and what websites you visit? If so, please explain what you believe internet service providers 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 internet service provider's responsibility to monitor and police online copyright infringement? Please describe what you believe the internet service provider'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?

2

- 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: September 13, 2022

By: /s/ Richard L Brophy Richard L. Brophy (admitted pro hac vice) Zachary C. Howenstine (admitted pro hac vice) Mark A. Thomas (admitted pro hac vice) Margaret R. Szewczyk (admitted pro hac vice) Sydney K. Johnson (admitted pro hac vice) ARMSTRONG TEASDALE LLP 7700 Forsyth Blvd., Suite 1800 St. Louis, Missouri 63105 Telephone: 314.621.5070 Fax: 314.621.5065 rbrophy@atllp.com zhowenstine@atllp.com mathomas@atllp.com mszewczyk@atllp.com skjohnson@atllp.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