

1 SELARZ LAW CORP.
DANIEL E. SELARZ (State Bar No. 287555)
2 *dselarz@selarzlaw.com*
11777 San Vicente Blvd., Suite 702
3 Los Angeles, California 90049
Telephone: 310.651.8685
4 Facsimile: 310.651.8681

5 **Attorneys for Plaintiff(s),**
[CLIENT'S NAME(S)]
6

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF [COUNTY], [DISTRICT]**
9

10 [PLAINTIFF(S)], an individual,
11 Plaintiff,
vs.

12 [DEFENDANT(S)], and DOES 1 to [#],
13 inclusive,
14 Defendants.

Case No. []
[Assigned to the Hon. []]
Dept. []

**PLAINTIFF'S REQUEST FOR MINI-
OPENING AND SUPPLEMENTAL
COURT-CONDUCTED VOIR DIRE**

FSC Date: []
Trial Date: []

17
18 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF**
19 **RECORD:**

20 Plaintiff requests the Court to permit each side a mini-opening statement, of up to
21 two minutes, prior to voir dire, and also that the court's preliminary voir dire include
22 supplemental questions regarding tort reform prior to liberal attorney voir dire, based on
23 California Code of Civil Procedure Section 222.5, which includes the following:

- 24 • "The trial judge should allow a brief opening statement by counsel for each party
25 prior to the commencement of the oral questioning phase of the voir dire process."
- 26 • "The trial judge shall not establish a blanket policy of a time limit for voir dire"

27 Because the law regarding mini-openings now has been clarified to state the court
28 should allow them, it respectfully is requested that the court permit each side a mini-

1 opening statement, of up to two minutes, prior to voir dire.

2 It is also requested that the court, when doing its preliminary voir dire, include the
3 following questions regarding tort reform:

- 4 1. Is the number of lawsuits: (i) too high; (ii) about right; or (iii) too low? Why?
- 5 2. Are jury verdicts: (i) too high; (ii) about right; or (iii) too low? Why?
- 6 3. Before hearing the evidence, would you be more likely to render a verdict that is:
7 (i) larger; (ii) average; or (iii) smaller? Why?
- 8 4. How do you feel about awarding money for pain and suffering? Why?
- 9 5. Should there be limits on awards for money damages in personal injury cases?
- 10 6. Do people fake or exaggerate personal injuries in lawsuits?

11 Further, it is respectfully requested that the court follow the statutory clarification
12 of existing law that a blanket policy of a time limit for voir dire not be imposed and that
13 liberal voir dire be permitted.

14
15
16 DATED: May 24, 2020

SELARZ LAW CORP.

17
18 By: _____
19 Daniel E. Selarz, Esq.
20 **Attorneys for Plaintiff(s),**
21 [Client's Name(s)]
22
23
24
25
26
27
28

PROOF OF SERVICE

Case No. []

I, the undersigned, declare as follows:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. I am an employee of, or agent for, SELARZ LAW CORP., whose business address is 11777 San Vicente Blvd., Suite 702, Los Angeles, CA 90049.

On May 24, 2020 I served the foregoing document(s) **PLAINTIFF'S REQUEST FOR MINI-OPENING AND SUPPLEMENTAL COURT-CONDUCTED VOIR DIRE** to the following party(ies) in this action addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

- (BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Beverly Hills, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.
- (BY PERSONAL SERVICE) I caused to be delivered each such document by hand to each addressee above.
- (BY CERTIFIED MAIL – CCP §§1020, et seq.) I caused said document(s) to be deposited with the United States Mail, postage prepaid, return receipt requested, signed by addressee that said documents were received.
- (BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by **United Parcel Service®(UPS)**. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS or delivered to a courier or driver authorized by UPS to receive documents on the same date it is placed for collection.
- (BY FACSIMILE) By use of facsimile machine number (310) 651-8681, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
- (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at their electronic notification addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on May 24, 2020, in Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Daniel E. Selarz

SERVICE LIST

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

SENT VIA U.S. MAIL

[Attorney's Name]
[Law Firm Name]
[Street Address]
[City, State & Zip Code]

Tel: (xxx) xxx-xxxx / Fax: (xxx) xxx-xxxx
Email: [Email Address]

[Attorneys for Defendant [DEFENDANT'S NAME]]