

STATE OF MINNESOTA  
COUNTY OF RAMSEY

DISTRICT COURT  
SECOND JUDICIAL DISTRICT

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STATE OF MINNESOTA,

Plaintiff,

vs.

MONICA BICKING,  
ROBERT CZERNIK  
GARRETT FITZGERALD,  
LUCE GUILLEN-GIVINS,  
ERIK OSELAND,  
NATHANAEL SECOR,  
MAX SPECKTOR,  
ERIN TRIMMER,

No. 62-CR-08-10515  
No. 62-CR-08-10338  
No. 62-CR-08-10335  
No. 62-CR-08-10342  
No. 62-CR-08-10345  
No. 62-CR-08-10365  
No. 62-CR-08-10336  
No. 62-CR-08-10370

Defendants.

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**DEFENDANTS' JOINT MOTION TO UTILIZE JURY QUESTIONNAIRE**

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PLEASE TAKE NOTICE that on February 2, 2010 at 9:00 a.m., as soon thereafter as counsel may be heard, before the Honorable Teresa R. Warner, Defendants, through undersigned counsel, will move the Court for an Order requiring the Clerk of Court to send out written juror questionnaires to all prospective petit jury panel members in the above-captioned cases, requiring the prospective jurors to fill out the questionnaires and return them to the Court for review by all counsel.

The questionnaires will facilitate an expeditious and just voir dire by the Court and counsel, ensure that potential juror bias is thoroughly evaluated, and facilitate the jury selection process. The use of this questionnaire will save court time and enable both parties to the case to better utilize the peremptory challenges and to determine whether challenges for cause are necessary. A jury questionnaire is particularly important in the instant case because of the

extremely large amount of publicity given to this case and the incidents allegedly associated with this case; the complexity of the legal and factual issues related to the large alleged conspiracy involving multiple defendants and hundreds of other people; and the politically and legally sensitive issues raised by this case that may impact jurors when they are called upon to assess the lines between free speech and alleged criminal acts, and in the process, consider and appropriately set aside inflammatory issues such as Defendants' alleged "anarchist" political philosophy. A jury questionnaire will assist the parties and the Court in determining whether each prospective juror is unduly prejudiced in a manner that will increase efficiency, protect juror privacy where necessary and helpful, and encourage greater juror honesty.

If this motion is granted, Defendants will prepare a proposed questionnaire and provide it to opposing counsel for further input. The Court may then approve the questionnaire, make further revisions, and resolve any disputes.

This motion is based on all files and records, and arguments of counsel.

Dated: January 25, 2010

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