

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS.

NOVEMBER TERM, 2001

SUPERIOR COURT

Nos. 00-S-888-896; 934-935

The State of New Hampshire

v.

Chad Evans

STATE'S PROPOSED QUESTIONS FOR INDIVIDUAL JURY VOIR DIRE

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General and, pursuant to this Court's order, hereby submits the following seven proposed questions for individual jury voir dire:

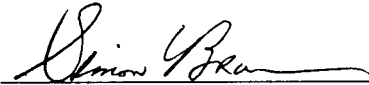
1. If a witness gave inconsistent statements about what happened regarding the crime, how would you determine which statements to believe?
2. You are going to hear from two medical doctors in this case. If they reached different conclusions about what happened to the victim, how would you evaluate their testimony?
3. What are your views on the appropriateness of physical discipline of a child?
4. If you disliked a witness or you disliked what the witness did in the case, could you still believe the witness was telling the truth?
5. If you heard evidence from witnesses who saw bruises on the victim before her death but did not take any steps to report what they saw to the authorities, how would that affect how you assess the witness's testimony?
6. How would you view the testimony of a witness who is also facing charges relating to the case but has been granted immunity so that the witness's testimony cannot be used against the witness later.
7. Would you be able to view autopsy photos of a 21-month-old toddler and consider them objectively in light of the other evidence in the case?

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE


By its attorneys,

Philip T. McLaughlin  
Attorney General



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Simon R. Brown  
Assistant Attorney General  
Homicide Unit



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N. William Delker  
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November 15, 2001

I hereby certify that a copy of the foregoing were mailed this day, postage prepaid, to Alan Cronheim, Esquire and Mark Sisti, Esquire, counsel of record.



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N. William Delker