

Guide for Using the Plain Language Model Jury Instructions:

Titles of Instructions—The titles of the instructions are for the attorneys' benefit. Occasionally, the titles will contain words that are not in the instruction.

Sources and Authority—Each instruction lists a source or sources to support the basis for the instruction.

Definitions of Legal Terms—The instructions are generally drafted to include any necessary definitions within the instruction. The definitions are separated from the “General Instruction” and the “Verdict Form.”

Burden of Proof—The appropriate burden of proof is included in each instruction.

Alternatives and Options—Many instructions require the attorneys to select from alternative language offered in the instruction. In general, words or phrases contained in brackets require the attorney to select the most appropriate language for the facts of the case.

Multiple Parties—The subcommittee drafted these instructions primarily for a case involving one plaintiff against one defendant. In cases where multiple parties are involved, these instructions will need to be modified to fit the facts of the case.

Multiple Causes of Action—The subcommittee drafted these instructions for a case involving one cause of action. In cases where multiple causes of action are involved, these instructions will need to be modified and/or combined to accompany the facts and causes of action in the case.

Modification as Required by the Facts of the Case—The subcommittee drafted these instructions for a basic, non-complicated case. In more complicated cases, the attorneys will need to modify the instructions to fit the facts and the circumstances of the case.

Practice Notes—Several instructions offer practice notes which should be useful to the attorneys and/or the court when drafting the instructions.

Verdict Forms—The subcommittee drafted verdict forms to accompany the elements listed in the general instructions. The subcommittee was of the opinion that use of the verdict forms will assist the jury in reaching a verdict.