

## **Introduction—Using the Mississippi Civil Jury Instruction Handbook**

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This Handbook contains the text of selected jury instructions from more than sixty cases that went to trial and resulted, unless otherwise noted, in a jury verdict. The cases are mostly from circuit court, with the exceptions of will contests tried in chancery court and eminent domain cases tried in county court. Most were appealed and heard by either the Mississippi Court of Appeals or the Mississippi Supreme Court. Each case section also has a summary of the facts and other information about the case. The jury instructions were collected from the official court records.

The Handbook is divided into twelve chapters that cover a broad range of causes of action. Each chapter in the Handbook corresponds with a chapter in the Mississippi Model Jury Instructions—Civil volume.

The jury instructions in the Handbook have been edited or modified to remove the proper names of the parties in the cases and replaced with the parties' designation such as "plaintiff" or "defendant." Such modifications and others are indicated by the use of brackets. Capitalization generally was not changed. Each case discussion includes most, if not all, of the jury instructions that were granted in that particular case. In some cases, jury instructions that were refused, withdrawn, or not otherwise marked may be included in the case discussion for illustrative purposes along with an author's note informing you of that fact.

As the reader will see, the Handbook is a rich resource for drafting jury instructions for use in a particular case and illustrating how the Mississippi Model Jury Instructions can be used by the practitioner in preparation for trial.