

## INTRODUCTION TO THE 2025 EDITION

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*New York Pattern Jury Instructions Companion Handbook* provides guidance on using New York Pattern Jury Instructions—Civil as a research and case-planning tool. It contains examples of jury instructions given by New York judges and requests for instructions submitted by attorneys for parties in a wide variety of cases. Each year author Michael A. Rosenhouse adds new coverage and updates the discussion. Commentary from Hon. Robert J. Lunn, Associate Justice, Appellate Division, New York Supreme Court, Second Department and Fourth Department (RET.), offers a valuable perspective on civil trial practice.

The purpose of this book is to make your case management and trial preparation more efficient and effective by inviting your attention to pattern, actual and proposed jury instructions and the research supporting them. Its underlying theory is that it's best to know in advance how you want to end up. If you know beforehand what the judge will be telling the jury and why, chances are you'll do a better job of preparing your case all the way through. It is called a “companion handbook” because it coordinates closely with New York Pattern Jury Instructions (NYPJI), drawing attention not only to the pattern instructions there but also to the extensive research material contained within its pages.

While this book of necessity draws heavily on NY PJI, it is not a part of NY PJI and its text has not been approved, sanctioned, or endorsed by the authors of NY PJI.

In the 2025 Edition new example jury instructions have been added and all discussions, citations, tables, and cross-references have been updated to refer to the 2025 Edition of the NYPJI.

Thank you for subscribing to *New York Pattern Jury Instructions Companion Handbook*.

THE PUBLISHER  
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