

JUDGE GONZALES' STANDARD CIVIL JURY INSTRUCTIONS CHECKLIST

Case Name: _____ Case No.: _____

_____ **Court's Instructions to the Jury (gen.1)**

_____ **Judges of the Facts (gen.2)**

_____ **Equal Standing (gen.3)**

_____ Plaintiff's Statement of Claims (see UJI 13-302) (supplied by plaintiff)

_____ Defendant's Affirmative Defenses (see UJI 13-302) (supplied by defendant)

_____ **Preponderance of the Evidence (gen.4)**

_____ Elements and Definitions of Claims and Defenses (supplied by parties)

_____ **Multiple Parties (gen.5)** (optional/may need revision according to parties)

_____ **Corporation as a Party (gen.6)** (optional)

_____ **Corporate Impartiality (gen.7)** (optional)

_____ **Definition of Evidence (gen.8)**

_____ **Circumstantial v. Direct Evidence (gen.9)**

_____ **Credibility of Witnesses (gen.10)**

_____ **Impeachment Instruction (gen.11)**

_____ **Scientific/Technical Evidence & Expert Opinion Instruction (gen.12)**

(no gen.13 instruction at this time)

_____ **Demonstrative Exhibits (gen.14)** (optional)

_____ **Limited Purpose (gen.15)** (optional)

_____ **Deposition Testimony (gen.16)**

_____ **Interrogatories Instruction (gen.17)**

_____ **Attorney Interview of Witnesses (gen.18)** (optional)

Page -2- Standard Civil Jury Instructions (cont'd)

_____ **Proximate Cause, General (gen.19A)**

_____ **Independent Intervening Cause (gen.19B)**

_____ **Determine Liability before Damages (gen.20)**

_____ **Damages Must be Reasonable (gen.21)**

_____ **Double Recovery (gen.22)**

_____ **Future Damages and Future Interest (gen.23)**

_____ Damages Instruction (specific to the case-supplied by parties)

_____ **Mitigation (gen.24)**

_____ **Life Expectancy (gen.25) (optional) (fill in accordingly)**

_____ **Punitive Damages (gen.26) (fill in accordingly; select term(s))**

_____ **Faithful Performance (gen.27A)**

_____ **Juror Use of Social Media (gen.27B)**

_____ **Foreperson/signature by Court (gen.28)**

Other Instructions:

NOTE:

The mutually agreed upon set of jury instructions submitted to Judge Gonzales should have a cover page listing requested standard jury instructions by the name given above. The cover page should also indicate where in the above list additional instructions requested by the parties should be placed.