

## ***Judge Strickland's Procedures for Submitting Criminal Jury Instructions***

---

1. Stock Instructions. On Judge Strickland's [webpage](#), there are "Standard" and "Common" Criminal Stock Instructions. The "Standard" instructions are used in most criminal jury trials. The "Common" instructions are frequently requested and used. Both sets are taken primarily from the 10th Circuit Pattern Instructions, and many have been modified for conciseness and clarity.
2. Counsel **must jointly file** a Praecipe with the Court, indicating all jury instructions accepted, requested, and proposed, and whether any are contested. Judge Strickland's Praecipe form is posted on the [webpage](#).
  - a. Judge Strickland plans to include the "Standard" Stock Instructions for most trials. On the Praecipe, please indicate whether the parties accept each "Standard" instruction in the appropriate column.
    - i. If the parties wish to deviate from the Standard Instructions, please indicate what modifications are requested and if they are contested.
  - b. Please indicate which "Common" Stock Instructions the parties request and whether the parties stipulate to the requested instruction.
  - c. Please indicate any additional proposed instructions, and whether they are proposed Jointly, by the Government, or by the Defense. Please cite authority for each proposed non-stock instruction and objection.
3. Proposed, non-stock jury instructions must be submitted to the following email address: [StricklandChambers@nmd.uscourts.gov](mailto:StricklandChambers@nmd.uscourts.gov).
  - a. Please include the following information in the subject line: "Jury Instructions - [case name] [docket number]."
  - b. Please submit in Word format.
  - c. Stock instructions need not be submitted. Simply complete a Praecipe.
  - d. Non-stock jury instructions must be clearly labeled as such and be accompanied by citations to supporting authority. Only one instruction should be submitted per page. If these instructions are contested, objecting counsel should support their objection with authority.

### **In Summary:**

- Only one document should be *filed* with the Court: a completed Praecipe, indicating all stock and non-stock jury instructions requested.
- Only one document should be sent by *email*: proposed non-stock instructions, accompanied by citations to supporting authority at the bottom of each instruction.