

GUIDELINES FOR JURY INSTRUCTIONS IN CIVIL CASES
Magistrate Judge Bridget S. Bade

The parties must submit a joint list of proposed jury instructions. The list must contain four sections.

I. Section I must contain Ninth Circuit Model Civil Jury Instructions used by all Arizona Judges as found at www.azd.uscourts.gov under “Judges and Information/Orders, Forms & Procedures/All Judges.” If both parties request a model instruction the instruction shall be preceded by “ST” (stipulated). If only one party requests the instruction, the instruction shall be preceded by either “PL” (Plaintiff) or “DF” (Defendant). For example:

ST	§ 3.1	Duties of Jury to Find Facts and Follow Law
ST	§ 3.2	What is Evidence
DF	§ 3.3	What is Not Evidence
DF	§ 3.4	Jury to be Guided by Official English Interpretation
ST	§ 3.5	Direct and Circumstantial Evidence
PL	§ 3.6	Credibility of Witnesses
DF	§ 3.7	Opinion Evidence Expert Witnesses
ST	§ 3.8	Causation
ST	§ 3.9	Charts and Summaries Not Received in Evidence
ST	§ 3.10	Charts and Summaries in Evidence
DF	§ 3.11	Two or More Parties - Different Legal Rights
DF	§ 3.12	Impeachment Evidence - Witness

The parties must include the full text of all model instructions both on the electronic version submitted to Chambers by e-mail and in the joint pleading.

II. Section II shall contain any non-model instructions to which the parties have stipulated.

III. Section III shall contain any non-model instructions requested by Plaintiff (numbered consecutively). Plaintiff must cite authority to support the requested instruction. Defendant must state all objections to such instruction immediately following the instruction and Plaintiff's authority. Defendant must support any objection with citation to authority. If Defendant offers an alternative instruction, such alternative instruction must immediately follow Defendant's objection.

IV. Section IV shall contain any non-model instructions requested by Defendant (numbered consecutively). Defendant must cite authority to support the requested instruction. Plaintiff must state all objections to such instruction immediately following the instruction and Defendant's authority. Plaintiff must support any objection with citation to authority. If Plaintiff offers an alternative instruction, such alternative instruction must immediately follow Plaintiff's objection.

Each proposed instruction must begin on a new page.

Absent a showing of good cause, the failure to submit a proposed instruction or make an objection in the joint pleading by the deadline set forth in the Order Setting Final Pretrial Conference may result in the instruction being refused or the objection being deemed waived.