

Honorable Richard A. Jones

## **COURT'S GENERAL VOIR DIRE QUESTIONS**

1. THIS TRIAL IS EXPECTED TO LAST FOR \_\_\_\_\_ DAYS. AT LEAST THAT'S WHAT THE PARTIES TELL ME. REMEMBER, THERE IS NO TIME LIMIT ON THE AMOUNT OF TIME THAT ANY PARTICULAR JURY MAY DELIBERATE. IS THERE ANY JUROR WHO CANNOT BE HERE FOR THE ANTICIPATED DURATION OF THE TRIAL? (**EXPLAIN HARDSHIP**)
2. IS THERE ANYTHING ABOUT THE NATURE OF THIS CASE THAT WOULD CAUSE ANY PROSPECTIVE JUROR TO START INTO THE TRIAL WITH ANY BIAS OR PREJUDICE, EITHER ONE WAY OR ANOTHER?
3. IS THERE ANY HEALTH ISSUE, PHYSICAL PROBLEMS OR PERSISTENT PHYSICAL AGGRAVATION OR OTHER PROBLEM THAT WOULD MAKE IT DIFFICULT FOR YOU TO SIT AS A JUROR? (BAD BACK, MIGRAINES, ETC).
4. THE COURT PREVIOUSLY INTRODUCED THE PLAINTIFF AND HIS/HER ATTORNEY. DOES ANYONE KNOW THE PLAINTIFF OR HIS/HER ATTORNEY IN THIS CASE?
5. THE COURT PREVIOUSLY IDENTIFIED THE DEFENDANT AND HIS/HER ATTORNEY. DOES ANYONE KNOW OF THE DEFENDANT OR HIS/HER ATTORNEY IN THIS CASE?
6. HAVE ANY OF YOU HEARD OR READ ANYTHING ABOUT THIS CASE?
7. I WILL NOW ASK COUNSEL FOR THE PLAINTIFF TO LIST ALL OF THE WITNESSES THAT ARE EXPECTED TO BE CALLED TO TESTIFY.
  - (A) PLEASE RAISE YOUR CARD IF YOU BELIEVE THAT YOU KNOW ANY OF THESE WITNESSES. (COUNSEL READS NAMES.)

8. I WILL NOW ASK COUNSEL FOR THE DEFENDANT TO LIST ALL OF THE WITNESSES THAT ARE EXPECTED TO BE CALLED TO TESTIFY.

(A) PLEASE RAISE YOUR CARD IF YOU BELIEVE THAT YOU KNOW ANY OF THESE WITNESSES. (DEFENSE COUNSEL READS NAMES.)

9. DO ANY OF YOU KNOW ANYONE WHO WORKS IN THE LEGAL SYSTEM: JUDGE, LAWYER, CLERK, PROBATION OFFICER, PARALEGAL, ETC?

10. DO YOU HAVE ANY TRAINING OR WORK EXPERIENCE IN THE FIELD OF LAW?

11. HAVE YOU SERVED AS A JUROR IN A CRIMINAL OR A CIVIL CASE OR AS A MEMBER OF A GRAND JURY IN EITHER A FEDERAL OR STATE COURT?

(A) HAVE YOU EVER SERVED AS THE FOREPERSON?

12. HAVE YOU EVER TESTIFIED BEFORE IN ANY COURT PROCEEDING? (NOT A DEPOSITION.)

13. DOES ANYONE KNOW ANY OF THE OTHER JURORS FROM ANY CONTACT OTHER THAN YOUR MEETING THIS MORNING?

14. DOES ANY JUROR BELIEVE THAT HE OR SHE HAS STRONG FEELINGS, EITHER POSITIVE OR NEGATIVE, REGARDING OUR SYSTEM OF COMPENSATING INDIVIDUALS WITH MONEY DAMAGES FOR INJURIES?

15. DO ANY OF YOU HAVE ANY MORAL, RELIGIOUS, OR PHILOSOPHICAL BELIEFS THAT WOULD PREVENT YOU FROM FULFILLING YOUR DUTIES AND RESPONSIBILITIES AS A JUROR?

16. AS A JUROR IN THIS CASE, YOUR OBLIGATION WOULD BE TO LISTEN TO THE EVIDENCE AND FROM THAT DETERMINE THE FACTS ACCORDING TO THE LAW AS GIVEN TO YOU BY THE COURT. YOU MUST FOLLOW THE COURT'S INSTRUCTIONS ON THE LAW EVEN IF YOU DISAGREE WITH THEM. IS THERE ANY JUROR WHO CAN THINK OF ANY REASON WHY YOU WOULD BE UNABLE OR UNWILLING TO FOLLOW THE COURT'S INSTRUCTIONS OF LAW?
17. IF YOU WERE THE PLAINTIFFS / DEFENDANT IN THIS CASE, IS THERE ANYONE WHO WOULD NOT WANT A JUROR WITH YOUR PRESENT STATE OF MIND SITTING ON THE JURY?
18. IS THERE ANYONE WHO CAN THINK OF ANY REASON THAT WOULD PREVENT YOU FROM BEING ABLE TO RENDER A FAIR AND IMPARTIAL VERDICT IN THIS CASE?

THANK YOU, LADIES AND GENTLEMEN. I WILL NOW PERMIT THE LAWYERS TO HAVE \_\_\_\_\_ MINUTES PER SIDE TO ASK ADDITIONAL VOIR DIRE QUESTIONS.