

## CIVIL JURY INSTRUCTIONS

---

Judge Cartwright instructs every jury twice: prior to opening statements and at the conclusion of the evidence.

Judge Cartwright's standard preliminary jury instructions at the outset of the trial typically consist of the following Ninth Circuit Model Civil Jury Instructions: 1.3, 1.5, 1.6 or 1.7 (when applicable), 1.8 (when applicable), 1.9, 1.10, 1.11, 1.12, 1.13, 1.14, 1.15, 1.16, 1.17, 1.18, 1.20, 1.21.

At the conclusion of the case, Judge Cartwright's standard instructions will also include Ninth Circuit Model Civil Jury Instructions: 2.16, 3.1, 3.2, 3.3, 3.5.

Counsel are provided this standard set of jury instructions for two reasons. First, so that objections to any of Judge Cartwright's standard instructions may be raised at the pretrial conference; and second, so that counsel do not have to "reinvent the wheel" when submitting instructions on behalf of their clients. Any instructions included in the standard set need not be submitted by any party.

Counsel will be expected to submit to the Court (1) any further instructions upon which the opposing parties have conferred and agreed and (2) each side's proposed jury instructions upon which no agreement has been reached, along with explanations and any citations supporting differing positions. Counsel should follow the guidance set forth in LCR 51 regarding the format of proposed instructions.

Proposed jury instructions should be filed on ECF and submitted via email as a Word version to [cartwrightorders@wawd.uscourts.gov](mailto:cartwrightorders@wawd.uscourts.gov). Each side's set of proposed instructions should also include a proposed verdict form.

At the conclusion of the case, the Court will prepare with counsel the final and controlling set of instructions. Counsel is given an opportunity to take exceptions. Each juror is then given a set of final instructions to follow when the instructions are given to them, for reference during closing arguments, and to use during deliberations.