

United States District Court
Western District of Washington
The Honorable Jamal N. Whitehead

General Voir Dire Questions – CIVIL

1. This trial is expected to last for __ days. But there is no time limit on how long the jury may deliberate. Is there anyone who cannot be here for the expected length of trial?
2. I will now ask counsel for the Plaintiff to introduce themselves and the Plaintiff. Does anyone know the Plaintiff or their attorney?
3. I'm now going to ask Plaintiff's counsel to identify the witnesses they may call to testify at trial. After all the names are read, please raise your hand/card if you believe you know any of the witnesses. [*Plaintiff's counsel reads names.*]
4. Now the Defendant—counsel could you please introduce yourself and your client?
5. Does anyone know the Defendant or their attorney?
6. I will now ask counsel for the defense to list all the witnesses they may call to testify. Like before, after all the names are read, please raise your hand/card if you believe that you know any of the witnesses. [*Defense counsel reads names.*]
7. You've heard the description of this case. Raise your hand if you've heard, seen, or read anything about it?

8. I realize you don't know much about the case, but is there anything that you've heard so far that makes you think it would be difficult for you to be fair and impartial to both the Plaintiff and the Defendant here?
9. Other than from meeting them today, do you know any of the other jurors?
10. 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?
11. Do you or any close family members or friends work in the legal system?
12. Do you have any training or work experience in the legal field otherwise?
13. Have you or a close family member or friend ever been a litigant or party in a court hearing or proceeding?
 - Was there anything about that experience that would prevent you from being fair and impartial in this case?
14. Other than a deposition, have you ever testified before in any court proceeding?
15. Are there any health or physical issues or problems that would make it difficult or impossible for you to serve as a juror? (For example, a bad back, migraines, or medication you may be taking.)
16. Do you have any moral, religious, philosophical, or other beliefs that would prevent you from fulfilling your duties and responsibilities as a juror?
17. Does anyone have strong feelings, either positive or negative, about the concept of money as compensation for injuries?
18. If you are selected to sit on this case, you must reach a verdict based solely on the evidence presented at trial and in the context of the instructions I

give you about the law. You must disregard any outside ideas, notions, or beliefs about the law, and follow my instructions about the law even if you disagree with them. Please raise your hand if there's any reason why you would be unable or unwilling to follow the Court's instructions on the law?

19. Do any of you have any reason at all—perhaps something I haven't asked about—why you could not sit as a fair and impartial juror in this case?
20. Here's my final question: If you were the Plaintiff or the Defendant here, is there any reason that you would not want someone with your views or frame of mind sitting on the jury?