

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
Choose an item. DIVISION

Plaintiff(s).,)	
)	
Choose an item.,)	
)	
v.)	Case No. Case Number.
)	
Defendant(s).,)	
)	
Choose an item..)	

VOIR DIRE—CIVIL

We are about to select a jury for the trial of this case that has been announced ready for trial, and in order to assist the court and the attorneys in that selection process, we are going to proceed with what is called voir dire examination.

The purpose of voir dire examination is to afford the lawyers a full opportunity to inform themselves so that they may responsibly exercise their duties to their respective clients to select a fair and impartial jury for the trial of this particular case. No one wishes to probe unnecessarily into your private affairs, but the lawyers need to know, and the parties are legally entitled to know some information about you. Therefore, please answer each question as fully and as accurately as you can. We need you to give your best, honest, and sincere effort to answer each question. If you are not sure whether you have information called for by the question, tell us what you know or think—that is, tell us more rather than less. The information you

give in response to the court's and the lawyers' questions will be used only by the court and the lawyers to select a qualified jury for the trial of this case.

If any of the information requested is particularly personal to you, let me know and you can tell us about it here at the bench and not in front of everyone else.

I am now going to request the courtroom deputy to call the roll of jurors who have been summoned to this courthouse for a term of jury service through a random selection process, and have been selected through a similar random selection process to come into this courtroom as a possible jury venire, and who are now seated in the order in which that random selection process put you. As the courtroom deputy calls your name, would you please stand and tell us in a loud voice the information requested on the card each of you have been given.

As I indicated a few minutes ago, we are commencing the trial of the case of [INSERT]. This case [INSERT CASE DESCRIPTION].

Now, ladies and gentlemen, as indicated earlier, I am going to ask you some questions after which the attorneys will be allowed to ask you some additional questions if they so desire. Please answer these questions completely and truthfully. If your answer is "yes," raise your hand and give your name in a loud, clear voice when called upon to respond.

1. Is any juror familiar with the facts that may be involved in this particular case? How did you become familiar?

2. Does any member of the jury panel know of any reason why you may be prejudiced for or against the Plaintiff, or for or against the Defendant, because of the nature of this particular case or otherwise? In other words, is there anyone of you who could not be fair to both sides in this case due to the fact that this case involves [INSERT]?

3. I'll now ask the Plaintiff, [INSERT], to stand and face the jury. Are any of you related by blood or marriage to Plaintiff [Plaintiff]? Are any of you friends of theirs or do you know them? Please be seated, [INSERT].

4. The Defendant in the case is [INSERT]. [The company representative for the Defendant is [INSERT]]. Please stand. Are any of you related by blood or marriage to [Defendant/Company Representative]? Do any of you know [the Defendant/company representative]?

5. Have any of you or any person related to any of you by blood or marriage or close friend ever been employed by the Defendant? If so, when and in what capacity?

6. The attorneys in the case are [INSERT] of the law firm of [INSERT] in [INSERT], representing the Plaintiff [INSERT]; and representing the Defendant is [INSERT] of the [INSERT] law firm of [INSERT] of [INSERT].

7. Do any of you know personally any of these attorneys or anyone who works at one of their law firms? Which one and how?

8. Are any of you members of the jury panel related by blood or marriage to any of the attorneys in this case?
9. Have any of you, or any members of your immediate family, ever been represented by any of the attorneys in the case or to your knowledge been involved in any matter in which any of these attorneys were involved?
10. Do you know or are you related by blood or marriage to any of the other members of the jury panel?
11. Do you know me, Gray Borden, or any members of my courtroom staff: Angela Langley, _____, and _____?
12. The following people may be called as witnesses in this case. If you are related to or know any of these people, please raise your hand: [Counsel read witness lists]
13. Has anyone talked with you about this case or discussed it in your presence prior to your coming into this courtroom today?
14. Would any of you be the least bit hesitant promptly to report to me or the courtroom deputy should someone approach you about this case or talk to you about it while you are serving as a juror?
15. Have you or any person related to you by blood or marriage or any close friend ever been a party to or a witness in a lawsuit? If so, what kind of case, and how did the case turn out? Did it involve the Defendant?

16. Have you ever served as a juror in a criminal or civil case, or as a member of the grand jury either in federal or state court?

[INSERT PARTIES' PROPOSED VOIR DIRE]

17. Is there anyone who believes for whatever reason that they would be unable, if chosen to serve on the jury in this case, to be fair and impartial to both sides and to return a verdict based solely on the facts as you determine them to be from the evidence and the law as I give it to you to be applied to those facts.

18. Can any of you think of any other matter that you should call to the court's attention that may have some bearing on your qualifications as a juror or that may prevent you from rendering a fair and impartial verdict based solely on the evidence and my instructions as to the law?

I have asked all of the questions I intended to ask. The attorneys now may ask you some questions, but they are not required to do so. If they do, please answer them fully and truthfully.