

VOIR DIRE

As we stated earlier, this case is _____, Plaintiff, v. _____, Defendant, and it involves the Plaintiff's claims against the Defendant for _____.

1. Has anyone read or heard anything about this case?
2. Is any juror familiar with the facts that may be involved in this particular case? How did you become familiar?
3. 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 because this case involves allegations of ?
4. Do you know, or are you related by blood or marriage, to defendant?
5. Have any of you or any person related to any of you by blood or marriage ever been employed by the Defendant?
6. The attorneys in the case are _____, representing the Plaintiff, and _____, representing Defendant. Do any of you know personally any of the attorneys in the case or anyone else who works for the attorneys' firms? Which one and how?
7. Are any of you members of the jury panel related by blood or marriage to any of the attorneys in this case, or anyone else who works for the attorneys' firms?

8. 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 participated?

9. Does any member of the panel know or believe that they know any other member of the jury panel? If so, what is the nature of the relationship? Would this relationship influence your own judgment in this case?

10. If selected for this jury, you will be called upon to sit in judgment of another person. Knowing that, is there anyone here who believes that he/she might have a problem doing that, perhaps because of some political, or religious, or social, or philosophical reason?

11. Has anyone talked with you about this case or discussed it in your presence prior to your coming into this courtroom today?

12. 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?

13. 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 at trial and the law as I give it to you?

14. 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?

15. We anticipate that this case will take ___ days to try. Would this length of trial work an undue hardship on anyone?

I have now asked the questions I need to ask. Now, the attorneys may ask you some questions. Please answer them fully and truthfully.

Counsel may ask any additional questions from the podium, limited to 15 minutes per side (or per attorney)?

Does the Plaintiff have any additional questions? If so, proceed.

Does the Defendant have any additional questions? If so, proceed.