

[YOUR NAME]
[YOUR ADDRESS]
Telephone: [YOUR PHONE NUMBER]
[YOUR E-MAIL ADDRESS]
Fax: [YOUR FAX NUMBER]

STATE OF ARIZONA
MARICOPA COUNTY SUPERIOR COURT

_____, a [single/married
man/woman],

Plaintiff,

v.

**[Name of Defendant] and Jane Doe [last
name of defendant], husband and wife;
JOHN DOES 1-5; JANE DOES 1-5;
BLACK CORPORATIONS 1-5; and
WHITE PARTNERSHIPS 1-5,**

Defendants.

Case No. CV _____

**PLAINTIFF'S PROPOSED
JURY INSTRUCTIONS**

(Assigned to the Honorable
[name of the judge])

Plaintiff, pursuant to Rule 15 of the Arizona Rules of Civil Procedure, respectfully requests that the Court give the RAJI (Civil) fourth instructions indicated by a mark on this request, and the additional instructions that are submitted with his request. Plaintiff reserves the right to withdraw any of these instructions to add to these instructions as may be warranted by the evidence.

PRELIMINARY

- 1. Duty of Jury X
- 2. Importance of Jury Service.....
- 3. Evidence X
- 4. Rulings of the Court X
- 5. Credibility of Witnesses..... X
- 6. Expert Witness..... X
- 7. Evidence, Statements of Lawyers and Rulings X
- 8. No Transcript Available to Jury; Taking Notes..... X
- 9. Admonition..... X

1	10. Media Coverage.....	
2	11. Questions by Jurors.....	X
3	12. Exclusion of Witnesses.....	X
4	13. Alternate Jurors.....	X
5	14. Claims Made and Issues to Be Proved	
6	15. Scheduling During Trial.....	X
7	16. Outline of Trial.....	

STANDARD

7	1. Impeachment with Felony Conviction.....	
8	2. Burden of Proof (More Probably True).....	X
9	3. Burden of Proof (Clear and Convincing).....	
10	4. Corporate Party.....	
11	5. Respondent Superior Liability.....	
12	6. Impasse in Jury Deliberations	
13	7. Excused Alternate Jurors.....	
14	8. Closing Instructions.....	X
15	9. Insurance	

FAULT

14	1. Statement of Claim; Definition of Fault	
15	Definition of Negligence (No Comparative Fault).....	
16	2. Definition of Causation (No Comparative Fault).....	
17	3. Plaintiffs Burden of Proof (No Comparative Fault).....	
18	4. Statement of Liability Issues (No Comparative Fault).....	
19	5. Statement of Claims, Definition of Fault; Definition of Negligence (Comparative Fault).....	X
20	6. Definition of Causation (Comparative Fault).....	X
21	7. Burden of Proof (All Parties)(Comparative Fault).....	X
22	8. Statement of Liability Issues (Comparative Fault).....	X
23	9. Plaintiff's Fault (Contributory Negligence).....	
24	10. Plaintiff's Fault (Assumption of Risk).....	
25	11. Determining Relative Degrees of Fault (Comparative Fault).....	
26	12. Plaintiff's Fault (Nonuse of Seat Belt/Motorcycle Helmet).....	

PERSONAL INJURY DAMAGES

24	1. Measure of Damages.....	X
25	2. Pre-Existing Condition, Usually Susceptible Plaintiff.....	
26	3. Damages for Wrongful Death of Spouse, Parent or Child.....	
27	4. Punitive Damages.....	
28	5. Mortality Tables and Life Expectancy.....	X

Plaintiffs Requested Jury Instruction No. 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(_____)

Plaintiffs Requested Jury Instruction No. 2

(_____)

RESPECTFULLY SUBMITTED this ____ day of December, 2008.

[YOUR NAME]

By: _____

[Your name]

[Your address]

Pro per

ORIGINAL of the foregoing emailed
this _____ day of _____, 2015, to:

Clerk of the Court
Maricopa County Superior Court

The Honorable [Judge's name]
Maricopa County Superior Court

Attorneys for Defendant
[Name of attorney]
[Name of attorney's firm]
[Address of firm]
