

JUDGE ABRAMS' VOIR DIRE – CIVIL

1. Has anyone on the jury panel read or heard anything in the newspaper or on the radio, television, or on the internet concerning this matter?
 - If so, please identify yourself, and without going into the particulars of what you read, heard, or saw, identify the source of that information. Has this information caused you to form an opinion about the merits of this case?
2. Has any member of the jury panel discussed the issues in this case with anyone else or overheard such a discussion?
 - If so, based upon what you have read, heard, or discussed, have you begun to form any opinion concerning the facts in this case?
3. Do you, or any members of your family or friends, know me, Leslie Abrams, the presiding Judge in this case?
4. Does anyone know, in any way, the Plaintiff _____, Plaintiff's attorney _____, or any other attorneys or staff at Plaintiff's attorney's law firm _____?
5. Does anyone know, in any way, the Defendant _____, Defendant's attorney _____, or any other attorneys or staff at Defendant's attorney's law firm _____?
6. Does anyone have, or have a close family or friend who has, any close relationship with any of the lawyers at Plaintiff's attorney's firm _____?
7. Does anyone have, or have a close family or friend who has, any close relationship with any of the lawyers at Defendant's attorney's firm _____?

8. I am going to read a list of potential witnesses in this case. Does anyone know, in any way, the potential witnesses in this case?
9. Is there any member of the jury panel who knows any other members of the jury panel, whether from church, work, or the community?
 - If so, do you believe that, if you had to serve on the jury with the folks you know, that it would interfere with your ability to do your job as a fact finder?
10. Is there any member of the jury panel who has physical limitations that would inhibit his/her ability to sit during the length of a trial?
11. Has anyone in the jury panel, or a close family member of anyone in the jury panel, worked for either a state or federal court system in any capacity?
12. Has anyone in the jury panel, or a close family member of anyone in the jury panel, worked in the legal industry or had any legal training, such as law school, or legal, forensic, or criminal justice classes?
13. Is anyone on the jury panel, or close family member of anyone on the jury panel, a paralegal or legal assistant?
14. Has anyone in the jury panel ever had to testify in any sort of formal hearing, including a civil or criminal trial, or a deposition?
15. Has anyone on the jury panel or anyone in your immediate family ever participated in a lawsuit as a party or in any other capacity?
16. Has anyone on the jury panel served as a juror in a criminal or civil case or as a member of a grand jury in either a federal or state court?
17. As I said, the Plaintiff contends that Defendant [Plaintiff's claims against

Defendant]. It will be the Plaintiff's burden to prove that. If selected as jurors, I will tell you more about Plaintiff's burden of proof. For now, I want to make clear that Plaintiff can recover damages only if Plaintiff meets his/her burden of proof [if applicable]. Whether you feel sympathy or animosity towards Plaintiff or the Defendant will not play any role in your decision. If Plaintiff does not meet his/her burden of proof as to any claim, then it would be your duty as jurors to find for the Defendant as to that claim. Are there any among you who think that you cannot follow the law in that regard?

18. On the other hand, if Plaintiff carries her burden of proof, then Plaintiff can recover damages as authorized by the evidence [if applicable]. That is the law, and as a juror you would have to follow the law. Do any of you hold any belief or principle that would prevent you from awarding money as damages even though Plaintiff has proven that he/she is entitled to recover money as compensation for his/her loss?
19. Some of you may have watched courtroom TV shows, such as Law and Order, Judge Joe Brown, Suits, or The Good Wife. Is there any among you who believes everything you see on TV? The point is that those shows are entertainment, and they do not necessarily depict the reality of our civil litigation processes, and certainly do not provide any information that has anything at all to do with this case.
20. I am going to tell you the law that you must follow in reaching a verdict in this case. I am the only source of law that you must use to decide this case.
 - Is there anyone who for any reason will not follow the law that I charge?

21. Does anyone know any reason why you would not be able to render a verdict based solely on the evidence presented at the trial and on the law, as I will give it to you in my instructions, disregarding any other ideas, notions, or beliefs about the law that you may have?
22. Is there any member of the jury panel who believes that he or she could not follow the instructions of the Court concerning the law to be applied in this case if he or she thought the law should be different or in some way disagreed with that law?
23. You will not be called on to make any moral or religious judgments in this case. You will be called on to give a verdict in this case based on the evidence that the Court admits and the law that I charge. This is simply a legal judgment.
- Is there any member of the jury panel who, as a matter of conscience, for religious or moral or any other reasons, believes that he or she cannot sit in judgment in a civil trial against a fellow human being?
24. Is there any member of the jury panel who for any reason believes that he or she could not render a fair and impartial verdict based solely upon the evidence and the law?
25. After having heard the questions put to you by the Court, does anyone know of any reason why you could not sit on this jury and render a fair verdict based on the evidence presented and in the context of the Court's instructions on the law?