

GUIDELINES FOR JURY INSTRUCTIONS IN CIVIL CASES

U.S. Magistrate Judge Alison S. Bachus

The parties shall submit a joint list of proposed jury instructions via email to [Bachus Chambers@azd.uscourts.gov](mailto:Bachus_Chambers@azd.uscourts.gov) and the parties shall file their Joint Proposed Jury Instructions in the same, list format. The list shall contain four sections:

I. Section I shall contain **Ninth Circuit Model Civil Jury Instructions** Used by All Arizona Judges as found at www.azd.uscourts.gov under Judges' Info → Judges' Orders, Forms & Procedures → All Judges. If a model instruction is requested by both parties, the instruction shall be preceded by "ST" (stipulated-to). If the instruction is requested by only one party, the instruction shall be preceded by either "PL" (Plaintiff) or "DF" (Defendant¹).

For example:

ST § 3.1 Duty to Deliberate

ST § 3.2 Consideration of Evidence – Conduct of the Jury

DF § 3.3 Communication with the Court

DF § 3.4 Readback or Playback

ST § 3.5 Return of Verdict

PL § 3.6 Additional Instructions of Law

The parties shall include the full text of all model instructions both in the email and in the joint pleading.

II. Section II shall contain any **non-model instructions** to which the parties have **stipulated**.

III. Section III shall contain any **non-model instructions** requested by **Plaintiff** (numbered consecutively). Plaintiff shall include citation to authority to support the requested instruction. Defendant shall state all objections to such instruction immediately following the instruction and Plaintiff's authority. Defendant shall support any objection with citation to authority. If Defendant offers an alternative instruction, such alternative instruction shall immediately follow Defendant's objection.

IV. Section IV shall contain any **non-model instructions** requested by **Defendant** (numbered consecutively). Defendant shall include citation to authority to support the

¹ If there are multiple defendants, identify which defendant.

requested instruction. Plaintiff shall state all objections to such instruction immediately following the instruction and Defendant's authority. Plaintiff shall support any objection with citation to authority. If Plaintiff offers an alternative instruction, such alternative instruction shall immediately follow Plaintiff's objection.

Additional Requirements:

- Each proposed instruction shall begin on a new page.
- The parties should note that absent a showing of good cause, the failure to submit a proposed instruction or make an objection in the joint pleading by the deadline set forth in the Order Setting Final Pretrial Conference shall result in the instruction being refused or the objection being deemed waived.