

1 **GUIDELINES FOR JURY INSTRUCTIONS IN CIVIL CASES**
2 **Senior Judge David G. Campbell**

3 The parties shall submit a **joint** list of proposed jury instructions. The list shall contain
4 three sections: Ninth Circuit model instructions, stipulated non-model instructions, and
5 non-model instructions to which the parties have not stipulated.

6 I. Section I shall contain Ninth Circuit Model Civil Jury Instructions Used by All
7 Arizona Judges as found at www.azd.uscourts.gov under Judicial Officer
8 Information. If a model instruction is requested by both parties, the instruction shall
9 be preceded by "ST" (stipulated). If the instruction is requested by only one party,
10 the instruction shall be preceded by either "PL" (Plaintiff) or "DF" (Defendant).¹
11 For example:

12	ST	§ 3.1	Duties of Jury to Find Facts and Follow Law
13	PL	§ 3.3	What is Not Evidence
14	DF	§ 3.7	Direct and Circumstantial Evidence

15 The parties shall include the **full text** of all model instructions in the joint pleading. The
16 parties should modify the model instructions to fit the facts and legal issues in the case.

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

19 III. Section III shall contain any non-model instructions to which the parties have not
20 stipulated (numbered consecutively), with citation to authority to support the
21 requested instruction. Any objection to the requested instruction shall be stated
22 **immediately following** the requested instruction. If the objecting party proposes
23 an alternative instruction, such alternative instruction shall **immediately follow** the
24 objection. For example:

25 Plaintiff's proposed non-model instruction;
26 Defendant's objection to Plaintiff's proposed instruction;
27 Defendant's proposed alternative instruction, if any; and
28 Plaintiff's objection to Defendant's proposed alternative instruction.

Each proposed instruction shall begin on a new page

¹ If multiple defendants, identify which defendant is requesting the instruction.