

Standard, Non-Case-Specific Civil Voir Dire Questions

1. Read statement of the case.
 - Have any of you read or heard anything about this case from any source whatsoever?
 - Given this brief description of the facts, is there anything about this case that would cause you to believe that you could not consider the evidence fairly and impartially according to the law?
 - Do any of you know the plaintiff, [name], or the defendant, [name]?

2. Introduce self and staff: [courtroom deputy], [court reporter], and [law clerk].
Do any of you know me or any member of my staff on any basis, social, professional or otherwise?

3. The Plaintiff is represented by [attorney] of the law firm of [firm name].
Counsel please stand.
 - Do any of you know Plaintiff's counsel or any of the employees in their office on any basis, social, professional or otherwise?
 - Counsel, please introduce your client and those present at counsel table.
 - Do any of you know these individuals on any basis, social, professional or otherwise?

4. The Defendant is represented by [attorney] of [law firm name]. Counsel, please stand.
 - Do any of you know Defendant's counsel or any of the employees in their offices on any basis, social, professional or otherwise?
 - Counsel, please introduce your client and those present at counsel table.

- Do any of you know these individuals on any basis, social, professional or otherwise?

5. The witnesses who may be called during this trial are:

- [list potential witnesses]

➤ Do any of you know or think you might know any of these witnesses?

6. Do any of you have strong feelings either for or against a party who brings a lawsuit?

7. Have any of you or members of your family been a party or witness in any litigation, excluding domestic relations, traffic, or probate matters? If so, describe the circumstances.

8. This is a civil case which is to be decided by the preponderance of the evidence as to all issues. This is different from a criminal case where the government must prove its case beyond a reasonable doubt. Does anyone have a problem applying a lower burden of proof than used in a criminal case?

9. I will instruct you on the law at the conclusion of the case. If selected as a juror, you will take an oath to follow the law. Do any of you think you will have trouble following the law if you disagree with it?

10. Ladies and gentlemen, we recognize that jury service is probably an inconvenience for you, taking you away from your jobs and families and disrupting your daily routine. Jury service is, however, one of the most important duties that citizens of this country can perform. For this reason, from time to time we ask citizens to make sacrifices and serve on juries, even when inconvenient. Prospective jurors can be excused from jury service if the length of the trial or the daily schedule would impose undue hardship. By undue hardship I mean more than

inconvenience -- I mean genuine hardship that would be experienced by you or your family. This case is expected to last [number of] days. Would the length of the trial create an undue hardship for any of you?

11. I expect to conduct trial on these dates and times:

[days of week] [times]

Would this schedule create an undue hardship for any of you?

12. Do any of you have any other reason whatsoever, such as a physical difficulty, a health problem or home problems that might interfere with your serving as a fair and impartial juror in this case?

13. Did any of you know each other before this morning?

14. If there are any matters that you would rather discuss privately that may affect your ability to be a fair and impartial juror, please let the Court know.

15. We have up here and on the monitors some general background questions for each of you. Please stand and answer the questions. The last question asks about your prior jury service. With respect to any juries on which you have served, please indicate the nature of the case and the outcome of the trial.

A. Juror number.

B. Marital status.

C. Education after high school and major.

D. Number of children. Ages, if under 18.

E. Current job and spouse's current job. If retired, what was your occupation? If self-employed, what type of business?

F. Military service. Branch and dates.

G. Prior jury service. Criminal, civil, or grand jury? Approximate dates.

Nature of case and outcome/verdict if any.