**GENERAL *VOIR DIRE* QUESTIONS – CIVIL**

Honorable S. Kate Vaughan

1. This trial is expected to last for \_\_\_ days. However, there is no time limit on the amount of time that any particular jury may deliberate. Is there any juror who cannot be here for the anticipated duration of the trial? (Request explanation of hardship.)
2. Is there anything about the nature of this case that would cause any prospective juror to start into the trial with any bias or prejudice, either one way or another?
3. Is there any health issue, physical problem, or persistent physical aggravation or other problem that would make it difficult for you to sit as a juror? (*E.g.*, bad back, migraines, etc.)
4. The court previously introduced the plaintiff and the plaintiff’s attorney[s]. Does anyone know the plaintiff or the plaintiff’s attorney[s] in this case?
5. The court previously identified the defendant and defendant’s attorney[s]. Does anyone know of the defendant or the defendant’s attorney[s] in this case?
6. Have any of you heard, seen, or read anything about this case?
7. I will now ask counsel for the plaintiff [or the plaintiff, if *pro se*] to list all of the witnesses that are expected to be called to testify.

• Please raise your card if you believe that you know any of these witnesses. (Counsel or the *pro se* plaintiff reads names.)

1. I will now ask counsel for the defendant [or the defendant, if *pro se*] to list all of the witnesses that are expected to be called to testify.

• Please raise your card if you believe that you know any of these witnesses. (Defense counsel or the *pro se* defendant reads names.)

1. Do you know anyone who works in the legal system: judge, lawyer, clerk, probation officer, paralegal, etc.?
2. Do you have any training or work experience in the field of law?
3. Have you served as a juror in a criminal or a civil case or as a member of a grand jury in either a federal or state court?

• Have you ever served as the foreperson?

1. Have you ever testified before in any court proceeding (not at a deposition)?
2. Have you, your close friends, or your relatives ever been a litigant/party in a court hearing or proceeding?

• Was there anything about that experience that would preclude you from being able to be fair and impartial in this civil case?

1. Does anyone know any of the other jurors from any contact other than meeting this morning?
2. Does any juror believe that you have strong feelings, either positive or negative, regarding our system of compensating individuals with money damages for injuries?
3. Do you have any moral, religious, philosophical, or other beliefs that would prevent you from fulfilling your duties and responsibilities as a juror?
4. As a juror in this case, your obligation would be to listen to the evidence and from that determine the facts according to the law as given to you by the court. You must follow the court’s instructions on the law even if you disagree with them. Is there any juror who can think of any reason why you would be unable or unwilling to follow the court’s instructions of law?
5. If you were the plaintiff / defendant in this case, is there anyone who would not want a juror with your present state of mind sitting on the jury?
6. Is there anyone who can think of any reason that would prevent you from being able to render a fair and impartial verdict in this case?

Thank you. I will now permit the lawyers to have **\_\_\_ minutes** per side to ask additional *voir dire* questions.