

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

INSTRUCTIONS FOR PREPARING
JOINT JURY INSTRUCTIONS AND VERDICT FORMS
FOR CIVIL JURY TRIALS BEFORE **JUDGE JAMES J. BRADY**

Counsel for all parties shall confer and prepare "Joint Jury Instructions" which shall be filed in the record no later than the deadline set by the magistrate judge in the scheduling order.¹

The term "Joint Jury Instructions" means that **NO SEPARATE FILINGS** are allowed. **All submissions must be in one document** (i.e., one jointly-authored document containing all jury instructions proposed by the parties). If counsel are unable to agree as to any specific instruction, such disagreement shall be set forth in footnote(s) and supported with case authority and pinpoint citations. All Pattern instructions taken from the latest Edition of the 5th Circuit Pattern Instruction book may be referenced by number and edition used.

The parties shall include an instruction that summarizes the claims of the plaintiff(s) and an instruction that summarizes the claims/defenses of the defendant(s).

The parties shall include, **for every claim/defense**, a separate jury instruction that sets forth all of the **essential elements** that must be proven to prevail on that claim/defense.

Additionally, the parties shall file a joint verdict form that includes all of the necessary jury interrogatories for the trial. Objections shall be noted in footnotes. Jury interrogatories must match up with the proposed jury instructions (setting forth essential elements to be proven at trial).

Proposed voir dire questions need not be jointly submitted.

¹ Or any subsequent date, as ordered by the magistrate judge or district judge.