**PROCEDURE FOR SUBMITTING JURY INSTRUCTIONS AND**

**VERDICT FORMS BEFORE CIVIL JURY TRIALS**

Twenty-eight (28) days before all civil jury trials, the parties will submit a joint proposed draft set of final jury instructions to the Court. The parties must confer in a good faith effort to agree on as many charges as possible.

If the parties are unable to agree on particular charges, they should include in the joint submission their proposed jury instructions. The proposed, unagreed-to instructions should be numbered, embedded in the charges in the appropriate or desired place, and include a footnote explaining 1) what the objection to the charge is, and 2) what the proponent’s response to the objection is.

The Court will attempt to provide a draft set of jury charges to the parties in advance of trial. The Court will rule on the objections in that draft. An example of what the parties’ submission should look like, and the Court’s resolution of objections, is on the Court’s website.

 The parties must also confer in a good faith effort to agree on a proposed verdict form. However, if they are unable to agree, they may file separate verdict forms into the record. If the parties submit separate verdict forms, they should somehow indicate (e.g., by highlighting) which interrogatories the parties agree upon. Additionally, within seven (7) days of submitting jury verdict forms, the parties should file pocket briefs, not to exceed five (5) pages, identifying their issues with the other parties’ proposed verdict form. The Court will take the parties’ proposals and pocket briefs into account and will attempt to provide them a draft verdict form in advance of trial.

At the charge conference, the Court will provide the parties an opportunity to preserve for the record any objections the parties wish to maintain after the Court’s rulings.