

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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STANDARD VOIR DIRE QUESTIONS - CIVIL CASE  
MAGISTRATE JUDGE TU M. PHAM

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**General Voir Dire Questions  
(court asks the entire panel)**

1. The case that will be tried today is titled [case name]. As I stated before, the case is expected to take \_\_\_ days to try. Does this fact present any special problem to any member of the panel?
2. [The court will read a statement of the case to the panel]. Have any of you read or heard anything about this case before coming here today?
3. The plaintiff is [name] [and appearing on behalf of the company is \_\_\_]. Plaintiff is represented by [name of attorney], who is an attorney with the law firm of [name of firm]. I ask that plaintiff and counsel please stand at this time. Do any of you know the plaintiff, his/her attorney, or anyone who works for the law firm of [name of firm]? Have any of you, your family members, or your close friends ever been represented by or had any dealings whatsoever with [name of attorney] or anyone who works for [name of firm]?
4. The defendant is [name] [and appearing on behalf of the company is \_\_\_]. Defendant is represented by [name of attorney], who is an attorney with the law firm of [name of firm]. I ask that defendant and counsel please stand at this time. Do any of you know the defendant, his/her attorney, or anyone who works for the law firm of [name of firm]? Have any of you, your family members, or your close friends ever been represented by or had any dealings whatsoever with [name of attorney] or anyone who works for [name of firm]?
5. I am going to read you a list of names of individuals who may be called as witnesses or whose names may come up during this trial. Please raise your hand if you recognize any of these names.
6. Have any of you, your family members, or your close friends ever filed a lawsuit or been named in a lawsuit?
7. Are any of you aware of any potential claim that might be

brought by or against you, your family members, or your close friends, even if a lawsuit has not yet been filed?

8. You have heard a brief description of the nature of this case. Have any of you, your family members, or your close friends ever experienced any events similar to the events that allegedly happened in this case?
9. Have any of you ever served on a civil or criminal jury, or grand jury before?
10. Do each of you understand that this is a civil case, which is to be decided by a preponderance of the evidence? Do you understand that this is different from a criminal case where the government would have to prove a defendant guilty beyond a reasonable doubt?
11. Do each of you understand that you must wait until after all the evidence has been presented and after the court instructs you on the law that applies before making up your minds as to any fact or issue in this case?
12. Do any of you feel that because of past experiences, or because there is something about the nature of this case, or for any other reason, that you cannot be fair and impartial to each party in considering the case?
13. Do any of you hold philosophical, religious, or other beliefs that would prevent you from sitting and passing judgment on another person?
14. Do any of you believe that you would not or could not follow the law as I will later explain it to you, apply that law to the facts that you find in this case, and render a verdict required by the law?
15. Do any of you have any other reason, such as a health problem or home problem, that might interfere with your serving as a fair and impartial juror in this case?

**Individual Voir Dire Questions  
(court asks each member of the panel)**

1. Full name and age.
2. City of residence (if Memphis, the area of Memphis).
3. Marital status.

4. Number and age of any children.
5. Extent of formal education.
6. Any legal training or experience.
7. Present occupation and any other employment going back 10 years, including name of employer(s), nature of work, and length of time with each employer.
8. Present occupation (and prior employment going back 10 years) for spouse, other adults in the household, and any adult children not living in the household.
9. Interests and hobbies.
10. Whether there is any reason why you could not or would not be a fair and impartial juror in this case.

#### **Attorney Voir Dire Questions**

At this time, the attorneys will have an opportunity to ask you additional questions. Please raise your hand if you need to respond to a question.