

Standard Voir Dire Questions - Civil Case

1. The case which will be tried today is entitled _____ v.

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 plaintiffs in this case claim:

_____.

The defendant claims:

_____.

Have any of you ever seen or heard anything about this case from any source whatsoever?

3. The plaintiffs are seated at the counsel table. There are _____ plaintiffs in this lawsuit. I will introduce each of the plaintiffs, and I ask that they stand as I introduce them.

_____, will you please stand. Do any of you know _____? Plaintiffs are represented by

_____ is a member of the firm of _____. Do any of you know _____ or any member of his firm, which includes

_____?

Have any of you or a member of your family ever been represented by _____ or any member of his law firm?

4. There are _____ defendants in this case. The defendant _____ is

Mr. _____, a representative of _____
_____, is seated at
the other counsel table. Mr. _____ will
you please stand? Do any of you know the
defendant's representative
Mr. _____? Defendant is represented
by _____. Mr.
_____ is a member of the firm of
_____.

The other attorneys in Mr. _____ firm
are

_____.

Do any of you know _____ or
any member of his firm on a social or professional
basis? Have any of you or a member of your family
ever been represented by _____ or
any member of his law firm?

5. I am going to read you a list of witnesses who may be called during this trial. Please raise your hand if you know any of these persons.

6. Have any of you or your immediate family ever been a party to a civil lawsuit? Which side? When? What type of litigation?

7. Do any of you have a pending claim or pending lawsuit in federal or state court. Do any of you have a pending claim that may result in a lawsuit? Describe the claim.

8. I have briefly described the nature of this case. Have any of you or any members of your family or close friends ever been involved in a

_____? When
did the accident take place? Who was hurt? How
badly, was any claim made for injuries? Was there
litigation? Do you feel that this accident might
have some bearing on your judgment if you were
chosen as a juror in this trial?

9. How many of you have served on a jury before? Was that a civil jury? Criminal jury? When?
10. Do each of you understand that this is a civil case which is to be decided by the preponderance of the evidence? Do you understand that this is different from a criminal case where the government has to prove its case beyond a reasonable doubt?
11. Do you understand that you are to wait until the evidence has been presented and you have been instructed as to the law before making up your minds as to any fact or issue in the case? Do any of you feel that because of past experiences or for any other reason that you cannot be fair or impartial to each party in considering the case or could not or would not be able to follow the law as I will explain it to you later? Do any of you have any other reason such as a health problem or physical problem or home problem that might interfere with your serving as a fair and impartial juror in this case?
12. [insert questions submitted by counsel.]
13. Now, ladies and gentlemen, I am going to ask each of you a number of questions. Starting with Juror _____, please stand and answer the questions as I ask them: (1) Name; (2) What part of city of district do you live in; (3) Your level of education; (4) Your occupation and employer for the last five years; (5) Your spouse's name; (6) Your spouse's occupation for the last five years; (7) Whether there is any reason you know of why you could not fairly and impartially sit as a juror. (8) Do any of you know any of the other jurors?