**POST-EVIDENCE INSTRUCTIONS**

INSTRUCTION NO. \_\_

MEMBERS OF THE JURY:

 Now that you have heard the evidence, it is my duty to instruct you on the law that applies to this case.

It is your duty as jurors to follow the law as stated in these instructions, and to apply the law to the facts as you find them from the evidence.

You are not to single out one instruction alone as stating the law but must consider the instructions as a whole.

You are not to be concerned with the wisdom of any rule of law stated by these instructions. You must not substitute your own opinion of what the law is or ought to be.

You should not read into these instructions, or anything else I have said or done, any suggestion as to what your verdict should be. That is entirely up to you.

INSTRUCTION NO. \_\_

NO BIAS OR PREJUDICE AGAINST ANY PARTY

 You are to perform your duty as jurors without bias or prejudice as to any party. You must not be influenced by any personal likes or dislikes, opinions, bias, prejudice, or sympathy. That means that you must decide the case solely on the evidence before you.

 [IF APPLICABLE] Defendant is a corporation. A corporation is entitled to the same treatment as a private individual.

INSTRUCTION NO. \_\_\_[IF APPLICABLE]

MULTIPLE PARTES

 Although there are multiple parties in this case, each plaintiff is entitled to have his or her claims considered on their own merits. Likewise, each defendant is entitled to a fair consideration of its defenses against each plaintiff. You must evaluate the evidence fairly and separately as to each plaintiff and to each defendant. You must decide this case as if it were between individuals.

 Unless otherwise instructed, all instructions apply to both the plaintiff and the defendant.

INSTRUCTION NO. \_\_\_[IF APPLICABLE]

RESOLUTION OF CLAIMS AGAINST OTHER ENTITIES

 During the trial, you have heard about [insert names of persons/entities to whom fault may be allocated]. The plaintiff has resolved their differences with these [persons/entities].

 There are many reasons why entities resolve their disputes and you need not concern yourself with that. Resolving or failing to resolve a claim does not mean that anyone is or is not at fault. You will, however, be asked to decide whether any or all of these [persons/entities] were at fault for the [accident/incident] at issue.

 In making this determination, you must not consider the resolution of the claims against [insert name of persons/entities] as a reflection of any strength or weakness of any party’s claims or defenses. The resolution may be considered when determining whether the plaintiff may now have a financial interest in showing that [insert name of persons/entities] should bear all or more of the responsibility for the [accident/incident] at issue.

INSTRUCTION NO. \_\_\_

PREPONDERANCE OF THE EVIDENCE

 You may have heard that in a criminal case proof must be beyond a reasonable doubt, but this is not a criminal case. In a civil case such as this one, a different level of proof applies: proof by a preponderance of the evidence. This is a lower burden of proof than “beyond a reasonable doubt.”

 When I tell you that a party has the burden of proof or that a party must prove something by a “preponderance of the evidence,” I mean that the party must persuade you, by the evidence, that the fact is more likely to be true than not true. Another way of saying this is proof by the greater weight of evidence, however slight.

 The preponderance of the evidence is not determined by counting the number of witnesses or the amount of the testimony. Rather, it is determined by evaluating the persuasive character of the evidence. In weighing the evidence, you should consider all of the evidence that applies to a fact, no matter which party presented it. The weight to be given to each piece of evidence is for you to decide.

 In answering any question asked on the verdict form, if you find that the party’s claim is more likely true than not true, you should answer that question with a “Yes” [NOTE: If “Yes” is not an answer choice, provide appropriate alternative language]. If, however, the evidence appears to be equally balanced or in favor of the other party’s position with respect to any question asked on the verdict form, then you must answer that question with a “No” [NOTE: If “No” is not an answer choice, provide appropriate alternative language].

 If the evidence should fail to establish any essential element of a party’s claim by a preponderance of the evidence, you should find for the other party as to that claim.

INSTRUCTION NO. \_\_\_

“EVIDENCE” DEFINED

 The evidence in this case consists of the sworn testimony of the witnesses, regardless of who may have called them; all exhibits received in evidence, regardless of who may have presented them; and all facts that may have been admitted or stipulated.

 Statements and arguments of counsel are not evidence in this case. When, however, the parties stipulate or agree as to the existence of a fact, you must, unless otherwise instructed, accept the stipulation and regard that fact as conclusively proved.

 Any evidence as to which an objection was sustained by the court, and any evidence ordered stricken by the court, must be entirely disregarded.

 Anything you may have seen or heard outside the courtroom is not evidence and must be entirely disregarded.

 You are to consider only the evidence in this case. However, you are permitted to draw reasonable inferences from the facts that you find have been proved. An inference is a deduction or conclusion that reason and common sense would lead you to draw from facts that are established by the evidence in the case. In the absence of such facts, you may not draw an inference.

 You should weigh all of the evidence in the case, affording each piece of evidence the weight or significance that you find it reasonably deserves.

INSTRUCTION NO. \_\_\_

DIRECT AND CIRCUMSTANTIAL EVIDENCE

You may consider both direct and circumstantial evidence. There is no difference between the weight to be given to either direct or circumstantial evidence. Nor is a greater degree of certainty required of circumstantial evidence than of direct evidence.

“Direct evidence” is the testimony of one who asserts actual knowledge of a fact, such as an eyewitness.

“Circumstantial evidence” is proof of a chain of facts or circumstances indicating the existence or the nonexistence of a particular fact, or the occurrence or nonoccurrence of a particular event.

You should weigh all of the evidence in the case, giving each piece of evidence the weight or significance that you find it reasonably deserves.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

LIMITED PURPOSE EVIDENCE

 Some evidence was received for a limited purpose only. When I instructed you that an item of evidence was received for a limited purpose, you must consider it only for that limited purpose.

INSTRUCTION NO. \_\_\_

DO NOT SPECULATE OR RESORT TO CHANCE

 The law forbids you to decide any issue in this case by resorting to chance. When you deliberate, do not flip a coin, speculate, or choose one juror’s opinions at random. You must evaluate the evidence and come to a decision that is supported by the evidence.

INSTRUCTION NO. \_\_\_

CHARTS, SUMMARIES, AND EXEMPLARS

 Certain charts, summaries, and exemplars have been shown to you in order to help explain the evidence. However, the charts, summaries, and exemplars are not in and of themselves evidence. If the charts, summaries, or exemplars correctly reflect facts or figures shown by the evidence, you may consider them.

INSTRUCTION NO. \_\_\_

HABIT - ROUTINE PRACTICE

 You may consider evidence of the habit of a person or of the routine of a business or organization in determining whether the conduct of a person or organization on a particular occasion was in conformity with the habit or routine practice.

INSTRUCTION NO. \_\_\_

BELIEVABILITY OF WITNESSES

 Testimony in this case has been given under oath. You must evaluate the believability of that testimony. You may believe all or any part of the testimony of a witness. You may also believe one witness against many witnesses or many against one, in accordance with your honest convictions.

In evaluating the testimony of a witness, you may want to consider the following:

 (1) Personal interest: Do you believe the accuracy of the testimony was affected one way or the other by any personal interest the witness has in the case?

 (2) Bias: Do you believe the accuracy of the testimony was affected by any bias or prejudice?

 (3) Demeanor: Is there anything about the witness’s appearance, conduct or actions that causes you to give more or less weight to the testimony?

 (4) Consistency: How does the testimony tend to support or not support other believable evidence that is offered in the case?

 (5) Knowledge: Did the witness have a good opportunity to know what the witness was testifying about?

 (6) Memory: Does the witness’s memory appear to be reliable?

 (7) Reasonableness: Is the testimony of the witness reasonable in light of human experience?

 These considerations are not intended to limit how you evaluate testimony. You are the ultimate judges of how to evaluate believability.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

DEPOSITION TESTIMONY

 Certain testimony of witnesses who, for some reason, could not be present to testify from the witness stand has been presented to you by reading the deposition of the witness or by showing a videotaped deposition. A deposition is sworn testimony of a witness that was given previously, outside of court, with a lawyer for each party present and entitled to ask questions. Such testimony is evidence and you should consider deposition testimony the same way that you would consider the testimony of a witness testifying in court.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

EXPERT TESTIMONY

 An expert is a person who, by education, study, experience, skill, knowledge, and training in a particular art, science, profession, or occupation, may give his or her opinion regarding such matters, if they are relevant to the case. You should consider such expert opinion and should weigh the reasons, if any, given for it. You are not bound, however, by such an opinion. Give it the weight to which you feel it is entitled, or you may reject it in whole or in part if, in your judgment, the reasons given for the opinion are unsound.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

OUT-OF-STATE OR OUT-OF-TOWN EXPERTS

 You may not discount the opinions of any of the experts merely because of where they live or practice.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

DIFFERING TESTIMONY OF EXPERT WITNESSES

 If you find that a conflict exists in the testimony of the expert witnesses, you must resolve that conflict by weighing the various opinions and reasons for such opinions given by each of the experts, and the facts upon which the opinions are based, as well as the relative credibility and knowledge of the experts who have testified.

INSTRUCTION NO. \_\_\_

STATEMENT OF OPINION

 I allowed one or more witnesses to express an opinion. Consider opinion testimony as you would any other evidence and give it the weight you think it deserves.

INSTRUCTION NO. \_\_\_

INCONSISTENT STATEMENTS

 You may believe that a witness, on another occasion, made a statement inconsistent with that witness’s testimony given here. That does not mean that you are required to disregard the testimony. It is for you to decide whether to believe the witness.

INSTRUCTION NO. \_\_\_

“FAULT” DEFINED

 Your responsibility as jurors is to decide whether the plaintiff was harmed and, if so, whether anyone is at fault for that harm. Fault means any wrongful act or failure to act that causes harm to the person seeking recovery. The wrongful acts or failure to act alleged in this case are [state the causes of action involving fault].

 Your answers to the questions on the verdict form will determine whether anyone is at fault. We will review the verdict form in a few minutes.

INSTRUCTION NO. **\_\_\_**

“CAUSE” DEFINED

I have instructed you that the concept of fault includes a wrongful act or failure to act

that causes harm.

As used in the law, the word “cause” has a special meaning, and you must use this meaning whenever you apply the word. “Cause” means that:

 The person’s act or failure to act produced the harm directly or set in motion events that produced the harm in a natural and continuous sequence; and

The person’s act or failure to act could be foreseen by a reasonable person to produce harm of the same general nature.

 There may be more than one cause of the same harm.

INSTRUCTION NO. \_\_\_

PLAINTIFF’S CLAIMS

 The plaintiff asserts [insert number of claims] against the defendant, which are summarized as follows:

 (1) [insert first cause of action];

 (2) [insert second cause of action then repeat this step for each remaining cause];

 It is the plaintiff’s burden of proof to establish one or more of their claims. I will now explain the elements the plaintiff must prove for you to find the defendant liable on the respective claims.

 INSTRUCTION NO. \_\_\_[IF APPLICABLE]

COMPARATIVE FAULTOF NONPARTIES

 [Insert name of defendant] claims that one or more nonparties were at fault and that such nonparty or nonparties’ fault caused or contributed to the harm. This is called comparative fault.

 In this case, [insert name of defendant] alleges that certain nonparties were negligent and that their negligence caused or contributed, in whole or in part, to the [accident/incident] at issue in this case. The nonparties that the defendant claims were at fault based on negligence are [insert names of nonparties].

 [Insert name of defendant] has the burden of proving the [nonparty’s/nonparties’] negligence by a preponderance of the evidence. This means before fault may be allocated to one or more nonparty, you must find that [insert name of defendant] has proved all of the elements of a negligence claim against that nonparty.

 Any fault that is allocated to a nonparty reduces the plaintiff’s recovery.

INSTRUCTION NO. \_\_\_[IF APPLICABLE]

COMPARATIVE FAULTOF PLAINTIFF

 If you find that the defendant was negligent and caused harm to the plaintiff, you must decide if the plaintiff was also negligent and caused harm to [himself/herself]. If the plaintiff was negligent and [his/her] negligence was a cause of his own injuries, his own negligence must be compared to the negligence of [the defendant].

 A plaintiff whose negligence is less than 50 percent of the total negligence causing the plaintiff’s injuries may still recover compensation, but the amount will be reduced by the percentage of the plaintiff’s negligence. If the plaintiff’s negligence is equal to or greater than the negligence of the defendant, then the plaintiff may recover nothing.

INSTRUCTION NO. \_\_\_[IF APPLICABLE]

NEGLIGENCE OF NONPARTIES

 You must decide whether [insert name of nonparties] were negligent.

 In this context, negligence means that a person did not use reasonable care in [state briefly the negligent action]. We all have a duty to use reasonable care to avoid injuring others. Reasonable care is simply what a reasonably careful person would do in a similar situation. A person may be negligent in acting or in failing to act.

 The amount of care that is reasonable depends upon the situation. Ordinary circumstances do not require extraordinary caution. But some situations require more care because a reasonably careful person would understand that more danger is involved.

 To establish negligence, [insert name of defendant] has the burden of proving that:

 (1) One or more of the nonparties, meaning [insert name of nonparties], were negligent; and

 (2) this negligence was a cause of the [accident/incident].

INSTRUCTION NO. \_\_\_

ALLOCATION OF FAULT

 If you decide that more than one person is at fault, you must decide each person’s percentage of fault that caused the harm. This allocation must total 100%.

 When you answer the questions on damages, do not reduce the award by any nonparty’s or nonparties’ percentages you have allocated. I will make that calculation later.

INSTRUCTION NO. \_\_\_

MITIGATION OF DAMAGES

 The plaintiff had a duty to exercise reasonable diligence and ordinary care to minimize any damages caused by [insert name of defendant]’s fault. Any damages awarded to the plaintiff should not include those that [he/she] could have avoided by taking reasonable steps.

It is the defendant’s burden to prove that the plaintiff could have minimized [his/her] alleged damages, but failed to do so. If the plaintiff made reasonable efforts to minimize [his/her] alleged damages, then your award should include the amounts that [he/she] reasonably incurred to minimize them.

INSTRUCTION NO. \_\_\_

INTRODUCTION TO DAMAGES

ECONOMIC AND NON-ECONOMIC DAMAGES INTRODUCED

I will now instruct you about damages. My instructions are given as a guide for calculating what damages should be if you find that the plaintiff is entitled to them. If you decide, however, that the plaintiff is not entitled to recover damages, then you must disregard these instructions. The fact that I have instructed you concerning damages is not to be taken as an indication that I either believe or do not believe that Plaintiff is entitled to recover damages.

 If you decide that [insert name of defendant]’s fault caused injury to the plaintiff, you must decide how much money will fairly and adequately compensate the plaintiff for that injury. There are two kinds of damages: economic and non-economic.

INSTRUCTION NO. \_\_\_

PROOF OF DAMAGES

To be entitled to damages, the plaintiff must prove two points:

 First, that damages occurred. There must be a reasonable probability, not just speculation, that the plaintiff suffered damages from [insert name of defendant]’s fault.

 Second, the amount of damages. The level of evidence required to prove the amount of damages is not as high as what is required to prove the occurrence of damages. There must still be evidence, not just speculation, that gives a reasonable estimate of the amount of damages, but the law does not require mathematical certainty.

 In other words, if the plaintiff has proved that they have been damaged and have established a reasonable estimate of those damages, [insert name of defendant] may not escape liability because of some uncertainty in the amount of damages.

INSTRUCTION NO. \_\_\_[IF APPLICABLE]

ECONOMIC DAMAGES - MEDICAL CARE AND RELATED EXPENSES

 Economic damages are the amount of money that will fairly and adequately compensate the plaintiff for measurable losses of money or property caused by [insert name of defendant]’s fault.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

FACTORS IN DECIDING DAMAGES FOR WRONGFUL DEATH

 Damages include an amount that will compensate the plaintiff for the economic loss suffered due to [insert name of the deceased]’s death.

 Calculate this amount based on all circumstances existing at the time of [insert name of deceased]’s death that establish the plaintiff’s loss, including the age, health, and life expectancies of [insert name of deceased] immediately prior to the death.

 You may calculate economic damages for:

(1) The loss of financial support, past and future, that the plaintiff likely would have received, or been entitled to receive from [insert name of the deceased] had [he/she] lived. You will be asked to calculate such damages separately for

(a) Lost financial support from the date of [insert name of deceased]’s death on [insert date of death] to the date of your verdict;

(b) Lost future financial support from the date of your verdict to the end of [insert name of deceased]’s expected working life. This category may include any other evidence of assistance or benefits that the plaintiff likely would have received had [insert name of deceased] lived.

(2) Reasonable and necessary expenses for medical care, funeral and burial expenses and other related expenses incurred as a result of the [accident/incident].

INSTRUCTION NO. \_\_\_

PRESENT CASH VALUE

 If you decide the plaintiff is entitled to damages for future economic losses, then the amount of those damages must be reduced to present cash value. This is because any damages awarded would be paid now, even though the plaintiff would not suffer the economic losses until some time in the future. Money received today would be invested and earn a return or yield.

 To reduce an award for future damages to present cash value, you must determine the amount of money needed today that, when reasonably and safely invested, would provide the plaintiff with the amount of money needed to compensate the plaintiff for future economic losses. In making your determination, you should consider the earnings from a reasonably safe investment.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

NON-ECONOMIC DAMAGES DEFINED

 Non-economic damages are the amount of money that will fairly and adequately compensate the plaintiff for losses other than economic losses.

 Non-economic damages are not capable of being exactly measured, and there is no fixed rule, standard, or formula for them. Non-economic damages must still be determined even though they may be difficult to compute. It is your duty to make this determination with calm and reasonable judgment. The law does not require the testimony of any witness to establish the amount of non-economic damages.

 You may calculate non-economic damages for the loss of such things as love, companionship, society, comfort, pleasure, advice, care, protection and affection that the plaintiff has sustained and will sustain in the future.

 In determining this award, you are not to consider any pain or suffering of [insert name of deceased] prior to [his/her] death.

**Alternative Non-Economic Damages Instruction**

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

NON-ECONOMIC DAMAGES DEFINED

 Non-economic damages are the amount of money that will fairly and adequately compensate [insert name] for losses other than economic losses.

 Non-economic damages are not capable of being exactly measured, and there is no fixed rule, standard, or formula for them. Non-economic damages must still be awarded even though they may be difficult to compute. It is your duty to make this determination with calm and reasonable judgment. The law does not require the testimony of any witness to establish the amount of non-economic damages.

 In awarding non-economic damages, among the things that you may consider are:

 1. The nature and extent of injuries;

 2. The pain and suffering, both mental and physical;

 3. The extent to which [insert name] has been prevented from pursuing his ordinary affairs;

 4. The degree and character of any disfigurement;

 5. The extent to which [insert name] has been limited in the enjoyment of life; and

 6. Whether the consequences of these injuries are likely to continue and for how long.

 While you may not award damages based upon speculation, the law requires only that the evidence provide a reasonable basis for assessing the damages but does not require a mathematical certainty.

 I will now instruct you on particular items of economic and noneconomic damages presented in this case.

INSTRUCTION NO. **\_\_\_** [IF APPLICABLE]

SUSCEPTIBILITY TO INJURY

 A person who may be more susceptible to injury than someone else is still entitled to recover the full amount of damages that were caused by the defendant’s fault. In other words, the amount of damages should not be reduced merely because the plaintiff may be more susceptible to injury than someone else.

INSTRUCTION NO. \_\_\_ [IF APPLICABLE]

AGGRAVATION OF SYMPTOMATIC PRE-EXISTING CONDITIONS

 A person who has a physical condition or disability before the time of the accident at issue in the case is not entitled to recover damages for that condition or disability. The injured person, however, is entitled to recover damages for any aggravation of the pre-existing condition that was caused by defendant’s fault, even if the person’s preexisting condition made him more vulnerable to physical harm than the average person. This is true even if another person may not have suffered any harm from the event at all.

 When a pre-existing condition makes the damages from injuries greater than they would have been without the condition, it is your duty to try to determine what portion of the harm to the plaintiff was caused by the pre-existing condition and what portion was caused by the accident at issue in the case you are deciding.

 If you are not able to make such an apportionment, then you must conclude that the entire

harm or condition was caused by defendant’s fault.

INSTRUCTION NO. \_\_\_[IF APPLICABLE]

AGGRAVATION OF DORMANT PRE-EXISTING CONDITION

 A person who has a physical condition before the time of sustaining the injuries at issue in a case is not entitled to recover damages for that pre-existing condition or disability.

 However, if a person has a pre-existing condition that does not cause pain or disability, but sustaining the injuries at issue in a case causes the person to suffer pain or disability, then he may recover all damages caused by the event.

INSTRUCTION NO. \_\_\_

COLLATERAL SOURCE PAYMENTS

 You should award damages in an amount that fully compensates the plaintiff. Do not speculate about or consider any other possible sources of benefit the plaintiff may have received. After you have returned your verdict, I will make whatever adjustments may be appropriate.

INSTRUCTION NO. \_\_\_

ARGUMENTS OF COUNSEL NOT EVIDENCE OF DAMAGES

 You may consider the arguments of the lawyers to assist you in deciding the amounts of damages, but their arguments are not evidence.

**POSTARGUMENT INSTRUCTIONS**

INSTRUCTION NO. \_\_\_

JURY DELIBERATIONS

You have now heard the closing arguments of the parties. In a few minutes, you will be escorted to the jury room. Each of you will be permitted to take your copy of these instructions with you. Any exhibits admitted into evidence will also be placed in the jury room for your review.

When you go to the jury room, you should first select a foreperson, who will preside over your deliberations and will be your spokesperson here in the courtroom.

I suggest that you should then review the instructions. Not only will your deliberations be more productive if you understand the legal principles upon which your verdict must be based, but for your verdict to be valid, you must follow the instructions throughout your deliberations. Remember, you are the judges of the facts, but you are bound by your oath to follow the law as stated in the instructions.

You will also be given the verdict form to take with you to the jury room. When you have reached unanimous agreement as to your verdict, you will have the foreperson fill it in, date and sign the form, and then return your verdict to the courtroom.

 Your deliberations will be confidential. You will not be required to explain your verdict to anyone.

INSTRUCTION NO. \_\_

The attitude and conduct of jurors at the outset of their deliberations are matters of considerable importance. It is rarely productive or good for a juror, upon entering the jury room, to make an emphatic expression of an opinion on the case or to announce a determination to stand for a certain verdict. When one does that at the outset, a sense of pride may be aroused, and the juror may hesitate to recede from an announced position if shown that it is wrong.

INSTRUCTION NO. \_\_

The verdict must represent the considered judgment of each juror. In order to return a verdict, it is necessary that each juror agree to the verdict. Your verdict must be unanimous.

It is your duty, as jurors, to consult with one another, and to deliberate with a view to reaching an agreement, if you can do so without violence to individual judgment. Each of you must decide the case for yourself—but do so only after an impartial consideration of the evidence in the case with your fellow jurors. In the course of your deliberations, do not hesitate to re-examine your own view, and change your opinion, if convinced it is erroneous. But do not surrender your honest conviction as to the weight or effect of evidence solely because of the opinion of your fellow jurors, or for the mere purpose of returning a verdict.

Remember at all times, you are not partisans. You are judges of the facts. Your sole interest is to seek the truth from the evidence in the case, without speculation or assumption.

INSTRUCTION NO. \_\_

If it becomes necessary during your deliberations to communicate with me, you may send a note through the court security officer, signed by your foreperson or by one or more jurors. No member of the jury should attempt to communicate with me, or any other member of the court's staff, by any means other than a signed writing; and I, and other members of the court’s staff, will never communicate with any member of the jury on any subject touching the merits of the case, otherwise than in writing or orally here in open court.

You will note from the oath the court security officer will take that the officer, as well as any other person, is also forbidden to communicate in any way with any juror about any subject touching the merits of the case.

Bear in mind also that you are not to reveal to any person—not even to me—how the jury stands numerically or otherwise until you have reached a unanimous verdict.

INSTRUCTION NO. \_\_

During your deliberations, you are able as a group to set your own schedule for deliberations. You may deliberate as late as you wish or recess at an appropriate time set by yourselves. You may set your own schedule for lunch and dinner breaks.

If your deliberations will go beyond today, please inform me by a note when you recess for the evening and indicate at what time you intend to reconvene.

POST-VERDICT INSTRUCTION

Your duty as jurors is complete and you are discharged from service. Thank you very much for your service. Your attention, timeliness, and dedication are appreciated by all the parties, attorneys, court staff, and public. You are now relieved of the instructions I have given you not to talk or read or research about the case. You may do so if you choose.

You must leave your notes and copies of the jury instructions in the jury room to be destroyed.

(If applicable) [I have issued an Order Regarding Juror Contact that imposes limitations on contact and on statements you may make. Please review that order carefully.]

You may be contacted by parties to the case, their attorneys, or the media. You are under no obligation to speak to any of them. The court does not provide your contact information, but we will accept mail directed to you and forward it from the jury office.

Consider carefully your obligation to and the feelings of your fellow jurors before speaking with anyone about your service here. Because of the special relationship of jurors to each other, I strongly recommend you never disclose the vote, discussions, or inclinations of a fellow juror. You may of course discuss your own feelings or reactions to evidence presented or your reaction to jury service.

I have instructed you to make your decision only on the basis of the evidence presented in court and to ignore outside information or influence. So, as long as you kept your oath to consider only the evidence in this case, there is no reason to speak with anyone about your service here as a juror.

Again, thank you very much for your service.