

ROLE OF THE COURT, THE JURY AND COUNSEL

You have listened carefully to the testimony presented to you. Now it is my duty to give you the instructions of the Court as to the applicable law and your two general duties as the jury on this case.

Your first duty is to consider and decide the factual issues of this case. You are the sole and exclusive judges of the facts. You weigh the evidence, you determine the credibility or believability of the witnesses, you resolve any conflicts there may be in the evidence, and you draw any reasonable inferences or conclusions that you believe are justified by the facts as you find them. In a moment, I will define the word "evidence" and instruct you on how to assess it, including how to judge whether the witnesses have been honest and should be believed.

Your second duty is to apply the law that I give you to the facts. Do not single out one instruction alone, but consider the instructions as a whole. You should not be concerned with whether you agree with any instruction given by the Court. You may have a different opinion as to what the law ought to be, but it would be a violation of your sworn duty as jurors to base your verdict on any version of the law other than what is contained in the instructions given by the Court.

The lawyers may have referred to some of the governing rules of law in their argument. However, if you find any differences between the law as stated by the lawyers and the law as stated by me in these instructions, you must follow my instructions. It is the lawyers' job to point out the things that are most significant or most helpful to their side of the case. But remember that the statements and arguments made by the lawyers are not evidence in this case.

In addition, nothing I say in these instructions should be taken as an indication that I have any opinion about the facts of the case, or what that opinion is. It is not my function to determine the facts; rather, that job is yours alone.

You must perform your duty as jurors with complete fairness and impartiality. You should consider the evidence carefully and without sympathy, bias or prejudice for or against any party. All parties expect that you will diligently examine all of the evidence, follow the law as it is now being given to you, and reach a just verdict regardless of the consequences.

[Corporation, Entity, or Institution] as a Party

As you know, some of the parties [Plaintiffs/Defendants] in this case are [corporations, entities, or institutions]. This should not affect how you view the case, however. You should consider the case to be an action between persons. A [corporation, entity, or institution] is entitled to the same fair treatment and consideration that you would give a private individual. All persons, including [corporations, entities, or institutions] are equal before the law.