**Judge Freudenthal Voir Dire – Civil**

1. Introduce the case and provide a brief statement of what plaintiffs and defendants claim.
2. Have each juror introduce himself/herself, explain where person works, whether married and, if so, what spouse does, whether person has any children at home and what they do, and whether person has any hobbies or special interests.
3. Ask whether person has served as a juror in a criminal or civil case or as a member of a grand jury in either a federal or state court. If served on a jury, was the person a chair or foreperson? If served on jury, was a verdict reached?
4. I have briefly described the nature of this case. Have any of you ever seen or heard anything about this case from any source whatsoever?
5. The plaintiff [insert] is represented here today by [attorney] of the law firm [insert]. Please stand. Do any of you know the attorney or any member of their firm on a social, business or professional basis?

* [Attorney], will you please introduce your client and ask him/her to stand. Are any of you personally acquainted with or related to Mr/Ms \_\_\_\_\_\_? Have any of you had any business dealings with Mr/Ms \_\_\_\_\_\_\_\_? Are you currently or have you formerly been employed by [company, if applicable]? Have any of you had any other relationship or business connection with Mr/Ms \_\_\_\_\_\_\_ ?

1. The defendant [insert] is represented here today by [attorney]. Please stand. Do any of you know either attorney or any member of the [insert] Law Firm on a social or professional basis?

* [Attorney], will you please introduce your client and ask him/her to stand. Are any of you personally acquainted with or related to Mr/Ms \_\_\_\_\_\_? Have any of you had any business dealings with Mr/Ms \_\_\_\_\_\_\_\_? Are you currently or have you formerly been employed by [company, if applicable]? Have any of you had any other relationship or business connection with Mr/Ms \_\_\_\_\_\_\_?

1. [Plaintiff’s attorney] will you read you list of witnesses you may call during this trial. [To the jury] Please raise your hand if you know any of these persons.
2. [Defendant’s attorney], will you read you list of witnesses you may call during this trial. [To the jury] Please raise your hand if you know any of these persons.
3. I have briefly described the nature of this case. Have you or any members of your family or close friends ever been involved in a [insert facts similar to case at bar]?

* When did this take place? Who were involved? [as applicable] Did anyone suffer any damages? How significant? Was any claim made for injuries? Was there litigation? Do you feel that this incident might have some bearing on your judgment if you were chosen as a juror in this trial?

1. Have you or any members of your family or close friends ever sustained similar injuries/damages to those claimed by [plaintiff(s)]?
2. Have any of you, any member of your family or close friend ever been a plaintiff or a defendant, or a witness in any lawsuit other than a domestic relations or a probate proceeding?
3. Do any of you have strong feelings either for or against a party who brings a personal injury lawsuit or a lawsuit claiming [insert as applicable]?
4. Do any of you not drive a car?
5. Are any of you engaged in the general insurance business?
6. Have any of you ever worked as a claims investigator or insurance adjuster?
7. [As applicable] Do you have any relatives or close friends who are or have been involved in law enforcement work as an investigating police officer? Would that cause you to give greater or lesser credence to a witness who is a law enforcement officer, simply because of that fact alone?
8. Do any of you or your close family members have previous legal experience which would include work as an attorney, law student or paralegal?
9. Have any of you written a letter to the editor?
10. Is anyone such a habitual user of the internet through facebook, blots, tweets, texts or google, either on your cell phone or computer, that it would be really difficult to follow the court’s instruction to not research or write anything about this case or the jury deliberations?
11. [If discrimination is an issue] Do any of you disagree with government policy favoring affirmative action?
12. Is there anything that has occurred to any of you or are there any facts which you think we should know about which might have a bearing on your judgment in this case?

*Ask questions submitted by counsel.*

1. Is there anything which has occurred to any of your or are there any facts which you think we should know about which might cause you to prejudge an issue in this particular case?
2. Is there anything about this case that may be bothering you?
3. Do all of you understand that this is a civil case which is to be decided by the relative weight of evidence on each side? And that this is different from a criminal case where the government has to prove its case beyond a reasonable doubt?
4. Do you accept the requirement that the jury’s verdict be unanimous?
5. Do all of you understand that you are to wait until all the evidence has been presented and you have been instructed as to the law which is to be applied before making up your minds as to any fact or issue in this case?
6. This case is expected to continue through [insert]. So the trial may take perhaps [insert] days not counting today. Trial will likely require your attendance here, in general, from approximately 8:15 in the morning until 5:30 in the evening. Would the length of the trial, the time required to serve each day, or the fact that Saturday jury service may possibly be required, create an undue hardship for any of you?
7. Do any of you have any other reasons whatever, such as a physical defect, a health problem or home problems which might interfere with your serving as fair and impartial jurors in this case?
8. If you are selected to sit on this case, will you be able to render a verdict solely on the evidence presented at the trial and in the context of the law as the court will give it to you in instructions, disregarding any other ideas, notions, or beliefs about the law that you may have encountered in reaching your verdict?
9. Having heard the questions put to you by the court, does any other reason suggest itself to you as to why you could not sit on this jury and render a fair verdict based on the evidence presented to you and in the context of the court’s instructions to you on the law?