# MODEL CIVIL JURY INSTRUCTIONS

FOR THE
DISTRICT COURTS OF THE
THIRD CIRCUIT

Prepared by Committee on Model Civil Jury Instructions Within the Third Circuit

2024 Edition

## COMMITTEE ON MODEL CIVIL JURY INSTRUCTIONS THIRD CIRCUIT

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#### INTRODUCTION

The Committee on Model Civil Jury Instructions for the Third Circuit is tasked with developing, revising, and maintaining standard jury instructions used at trials in the District Courts of the Third Circuit. The Committee's mission is to ensure that these instructions are clear, accurate and reflect the current state of the law. The Model Civil Jury Instructions serve as a resource for judges and for parties aiding them in effectively communicating complex legal principles to jurors and thereby enhancing the overall integrity of the trial process.

The Model Civil Jury Instructions consist of draft general instructions applicable in all civil jury trials as well as instructions covering the most common types of federal cases in which juries can be requested. It must be emphasized, however, that every case is unique in that each has its own fact pattern, and, thus, care must be exercised when adapting a draft instruction to an individual case.

The instructions also include Comments discussing relevant case law which could be useful not only in drafting jury instructions but also in addressing motions.

An appendix is included which contains links to jury instructions from other federal circuits as well as from state courts which could be useful in constructing instructions for causes of action not included in the Model Civil Jury Instructions.

These Model Civil Jury Instructions remain a work in progress. The law develops as time passes. Supreme Court and Court of Appeals' decisions require both major and minor revisions. Accordingly, the Committee meets regularly with its Reporters to review developments in the law.

Judges and lawyers who use these instructions are encouraged to submit suggestions for improvement. You may email any comments to <a href="mailto:comments\_juryinstructions@ca3.uscourts.gov">comments will be provided to the Committee for consideration at a future meeting. All suggestions will be reviewed, and as warranted, incorporated into the Model Civil Jury Instructions and Comments.

The Model Civil Jury Instructions are available in print. The Court of Appeals for the Third Circuit's website always contains a link to the most up to date version.