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5 **Attorneys for Plaintiff(s),**
[CLIENT'S NAME(S)]
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10 **Attorneys for Defendant(s).**
11 [DEFENDANT'S NAME(S)]

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF [COUNTY], [DISTRICT]**

14
15 [PLAINTIFF(S)], an individual,
16 Plaintiff,
17 vs.
18 [DEFENDANT(S)], and DOES 1 to [#],
inclusive,
19 Defendants.

Case No. []

**JOINT AND OBJECTED TO JURY
INSTRUCTIONS**

FSC Date: []
Trial Date: []

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22 **JOINT INSTRUCTIONS**
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No.	Title	Given as Proposed	Given as Modified	Refused	Withdrawn
INTRODUCTORY INSTRUCTIONS					
100.	Preliminary Admonitions				
101.	Overview of Trial				
102.	Taking Notes During the Trial				
105.	Insurance				
106.	Evidence				
107.	Witnesses				
111.	Instruction to Alternate Jurors				
113.	Bias				
EVIDENCE					
200.	Obligation to Prove— More Likely True Than Not True				
202.	Direct and Indirect Evidence				
203.	Party Having Power to Produce Better Evidence				
205.	Failure to Explain or Deny Evidence				
206.	Evidence Admitted for Limited Purpose				
208.	Deposition as Substantive Evidence				
209.	Use of Interrogatories of a Party				
210.	Requests for Admissions				
212.	Statements of a Party Opponent				
213.	Adoptive Admissions				
218.	Statements Made to Physical (Previously Existing Condition)				
219.	Expert Witness Testimony				

1	220.	Experts—Questions Containing Assumed Facts				
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3	221.	Conflicting Expert Testimony				
4	223.	Opinion Testimony of Lay Witness				
5	NEGLIGENCE					
6	400.	Essential Factual Elements				
7	401.	Basic Standard of Care				
8	411.	Reliance on Good Conduct of Others				
9						
10	418.	Presumption of Negligence per se				
11	424.	Negligence Not Contested—Essential Factual Elements				
12	430.	Causation: Substantial Factor				
13						
14	431.	Causation: Multiple Causes				
15	MOTOR VEHICLES AND HIGHWAY SAFETY					
16	700.	Basic Standard of Care				
17	701.	Definition of Right-of- Way				
18	704.	Left Turns (Veh. Code, § 21801)				
19	705.	Turning (Veh. Code, § 22107)				
20	706.	Basic Speed Law (Veh. Code, § 22350)				
21	DAMAGES					
22	3900.	Introduction to Tort Damages—Liability Contested				
23						
24	3901.	Introduction to Tort Damages—Liability Established				
25						
26	3902.	Economic and Noneconomic Damages				
27	3903.	Items of Economic Damage				
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3903A.	Medical Expenses – Past and Future (Economic Damages)				
3903C.	Past and Future Lost Earnings (Economic Damages)				
3905.	Items of Noneconomic Damage				
3905A.	Physical Pain, Mental Suffering, and Emotional Distress				
3924.	No Punitive Damages				
3925.	Arguments of Counsel Not Evidence of Damages				
3927.	Aggravation of Preexisting Condition or Disability				
3928.	Unusually Susceptible Plaintiff				
3930.	Mitigation of Damages (Personal Injury)				
CONCLUDING INSTRUCTIONS					
5000.	Duties of the Judge and Jury				
5001.	Insurance				
5002.	Evidence				
5003.	Witnesses				
5009.	Predeliberation Instructions				
5010.	Taking Notes during the Trial				
5011.	Reading back Trial testimony in Jury Room				
5012.	Introduction to Special Verdict Form				
5013.	Deadlocked Jury Admonition				
5014.	Substitution of Alternate Juror				
5015.	Instruction to Alternate Jurors on Submission of Case to Jury				

5016.	Judge's Commenting on Evidence				
5017.	Polling the Jury				
5020.	Demonstrative Evidence				
5090.	Final Instruction on Discharge of Jury				

PLAINTIFF'S REQUESTED INSTRUCTIONS; DEFENDANT OBJECTS

No.	Title	Given as Proposed	Given as Modified	Refused	Withdrawn

DEFENDANT'S REQUESTED INSTRUCTIONS; PLAINTIFF OBJECTS

No.	Title	Given as Proposed	Given as Modified	Refused	Withdrawn

DATED: May 23, 2018

SELARZ LAW CORP.

By: _____
 Daniel E. Selarz, Esq.
Attorneys for Plaintiff(s),
 [Client's Name(s)]

DATED: May 23, 2018

[FIRM NAME]

By: _____
 [Attorney's Name], Esq.
Attorneys for Defendant(s),
 [Defendant's Name(s)]