

STATE OF NEW YORK

SUPREME COURT COUNTY OF [INSERT COUNTY]

[INSERT PLAINTIFF]

Plaintiff

Index No: [INSERT]

RJI NO: [INSERT]

vs.

Hon. [INSERT]

[INSERT DEFENDANT]

Defendant

PLAINTIFF'S REQUEST FOR JURY CHARGE*

Plaintiff, by her attorneys [Name of Law Firm], submits the foregoing request for jury charges, in addition to the charges set forth in Judge [Insert] trial checklist, a copy of which is attached to this request to charge.

Plaintiff reserves the right to request other charges prior to the charge conference, and up until the jury is charged.

PJI 1:29 Alternate Jurors

PJI 1:55 General Instruction – Admission Against Interest – By Statement

PJI 1:60 General Instruction – Burden of Proof – When Burden Differs on Different Issues

PJI 1:63 General Instruction – Burden of Proof – Effect of Presumption

PJI 1:65 General Instruction – Evidence Admitted for Limited Purpose – Insurance

PJI 1:65.1 Social Security Benefits

PJI 1:75 General Instruction – Evidence – Failure to Produce Witness – In General

PJI 1:94 General Instruction – Use of Pre-Trial Depositions Upon Trial

PJI 1:97 General Instruction – Special Verdicts

PJI 1:103 General Instruction – Supplemental Charge – Note – Taking by Jurors

* Jury charges are fact specific and vary by case. The foregoing is an example of one proposed charge tailored to a specific case. Counsel should review the PJI carefully before submitting actual charges on a specific case.