

STATE OF NEW YORK

SUPREME COURT COUNTY OF [INSERT]

[INSERT]

Plaintiffs,

Index No: [INSERT]

RJI No: [INSERT]

vs.

Hon. [INSERT]

[INSERT]

Defendants.

PLAINTIFFS' REQUEST FOR JURY CHARGE*

The Plaintiffs, [Insert Plaintiffs' Names] individually and as parents and natural guardians of [Insert Infant Plaintiff Name], an infant, by and through their attorneys, [Name of Law Firm], request the following charges and reserve the right to request other or different charges ("boilerplate" charge requests excluded, per the Court). All references are to the [Insert Most Recent Edition] of the New York Pattern Jury Instructions ("PJI") version of the charge.

PJI 1:20 Introduction – Charge After Trial

PJI 1:21 Review Principles Stated

PJI 1:22 Falsus in Uno

PJI 1:25 Consider Only Testimony and Exhibits

PJI 1:25A Juror's Use of Professional Expertise

PJI 1:26 Five-Sixths Verdict

PJI 1:28 Conclusion

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

* 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.