### IDJI 1.41.2 – Charging instruction, plaintiffs case, verdict on special interrogatories

INSTRUCTION NO.\_\_\_\_\_

On plaintiffs’ claim of \_\_\_\_\_\_\_\_\_\_ against the defendant \_\_\_\_\_\_\_\_\_\_, the plaintiffs have the burden of proof on each of the following propositions:

1. [Proposition No. 1.]

2. [Proposition No. 2.]

3. [Etc.]

You will be asked the following question on the jury verdict form:

(Insert question exactly as it appears on the verdict form.)

If you find from your consideration of all the evidence that each of these propositions has been proved, then you should answer this question "yes." If you find from your consideration of all of the evidence that any of these propositions has not been proved, then you should answer this question "no."

Comment:

This instruction is the foundation for a verdict on special interrogatories. A charging instruction such as this should be given for each discrete claim or cause of action covered by a special interrogatory on the verdict form. The introductory sentence may be modified as necessary to specifically refer to each claim or cause of action which is covered by the charging instruction and the special verdict interrogatory to which it relates.