### IDJI 1.40.1 – General format, general verdict

INSTRUCTION NO. \_\_\_\_

On the issue of (identify issue), the (name of party) has the burden of proof on each of the following propositions:

(Set forth each element of the claim. State the ultimate fact or conclusion to be proved, not specific facts, in concise format. Use numbered paragraphs).

If you find from your consideration of all the evidence in the case that each of the foregoing propositions has been proved, your verdict should be for the (party claiming the issue). If you find that any of the propositions has not been proved, then your verdict should be for (party adverse to this issue).