

Attorney Guidelines for Preparing Jury Instructions for the Court

Counsel is requested to meet and confer over jury instructions and prepare the following sets for the Court:

- One set of **agreed** (by all parties) instructions.
- One set from each party of their own proposed instructions, which are **not agreed** by all parties.
- There should be **no duplication** in these sets, unless there is an issue over the language for a specific instruction. Please note that the Court always prefers to use Washington State Pattern Instructions, if one is applicable.
- Proposed verdict forms must be provided with proposed instructions. Parties should attempt to get a single, agreed verdict form, if possible. Alternatively, each party should propose their own verdict form.
- All sets should be provided to the bailiff electronically, via email in Word format, both cited and uncited for the Court's use and reference. This does not replace the requirement to present hard copy working copies to the Court as well.
- For uniformity, we would prefer to use the following guidelines for preparation of jury instructions:
 - Size 12 Times New Roman font
 - Double-spaced (Do not add space between paragraphs. Everything should be double spaced consistently.)
 - Justified 1-inch margins
 - Uncited instructions **SHOULD NOT** be numbered or titled
 - Uncited instructions **SHOULD NOT** have any identifying headers or footers or page numbers on them.