### IDJI 1.41.1 – General format, verdict on special interrogatories

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

On the issue of \_\_\_\_\_\_\_\_\_, the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 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).

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

(Insert the exact jury interrogatory on the issue).

If you find from your consideration of all the evidence in the case that each of the propositions contained in this instruction has been proved, you should answer the jury question “yes.” If you find that any of these propositions has not been proved, you should answer the question “no.”