

JURY SHOULD RENDER VERDICT BASED ON FACTS, NOT CONSEQUENCES.¹

You should not be swayed by pity, sympathy, partiality or public opinion. You must not consider the effect of a verdict on the plaintiff or defendant (or on any other party), or concern yourself as to whether it pleases the Court. Both the plaintiff and the defendant (as well as the other parties) (as well as the public) expect that you will carefully and fairly consider all the evidence in the case, follow the law as given to you by the Court and reach a just verdict, regardless of the consequences.

¹This change is to some degree modeled on Devitt and Blackmar, Federal Jury Practice and Instructions, § 11.03 (3d.ed. 1977).

