

FINAL MANDATE--ISSUE OF PLAINTIFF'S NEGLIGENCE (COUNTERCLAIM).

Finally, as to this (*state number*) issue on which defendant has the burden of proof, if you find, by the greater weight of the evidence, that the plaintiff was negligent and that such negligence was a proximate cause of the defendant's [injury] [damage], then it would be your duty to answer this issue "Yes" in favor of the defendant.

If, on the other hand you fail to so find, then it would be your duty to answer this issue "No" in favor of the plaintiff.

