COVENANTS NOT TO COMPETE--ISSUE OF WHETHER COVENANT WAS BREACHED.

This issue reads:

"Has (name party whose conduct is in issue) breached his agreement with (name other party) by (state conduct alleged to constitute breach)?"

The burden of proof on this issue is on (name party claiming breach) to satisfy you by the greater weight of the evidence that (name party whose conduct is in issue) breached his agreement by (state conduct alleged to constitute breach).

(Here summarize the evidence on this issue.)

So I finally instruct you on this issue that if you find by the greater weight of the evidence that (name party whose conduct is in issue) breached his agreement by (state conduct alleged to constitute breach) then you will answer this issue "Yes."

On the other hand if you fail to so find then you would answer this issue "No."