



**UNITED STATES DISTRICT COURT  
Southern District of California**

Ruth Bermudez Montenegro, U.S. District Judge

**CIVIL CHAMBERS RULES**

**Please Note:** The Court provides the foregoing Civil Chambers Rules (“Chambers Rules”) for general guidance to counsel. The Court may vary these procedures as appropriate in any case.

Unless otherwise ordered by the Court, counsel and pro se litigants are expected to follow the Federal Rules of Civil Procedure, the Local Rules for the Southern District of California (“Civil Local Rules”), the Electronic Case Filing Administrative Policies and Procedures Manual (“ECF Manual”), and any other applicable rules. The Civil Local Rules and the ECF Manual are available on this district’s website: [casd.uscourts.gov](http://casd.uscourts.gov).

For questions regarding filing and/or docketing, please contact:

- the Clerk’s Office at (619) 557-5600;
- the CM/ECF Helpline at (866) 233-7983; and/or
- the CASD CM/ECF Helpdesk at [ecfhelp@casd.uscourts.gov](mailto:ecfhelp@casd.uscourts.gov).

**I. Communications with Chambers**

**A. Contact Information.** The Chambers telephone line is (619) 695-5877 and email is [efile\\_montenegro@casd.uscourts.gov](mailto:efile_montenegro@casd.uscourts.gov).

In light of the Court’s procedure for setting motion hearing dates as set forth in Section III. B., telephone calls to chambers are rarely necessary. If your call is not answered, you may leave a voicemail—including your name, contact information, case number, case name, and detailed message. Upon reviewing the voicemail, the Court may return the phone call if necessary. Such calls may only be made by **counsel** with knowledge of the case. Please note that judicial staff are not authorized to offer legal advice or give time estimates for written rulings.

Letters, faxes, and emails are prohibited unless otherwise authorized by the Court. The Court’s e-file email account must only be used to lodge or submit proposed orders, required trial documents, or other documents requested by the Court.

**B. Transcripts.** The court reporter should *only* be contacted to order hearing or trial transcripts, or to ask transcript-related questions (e.g., inquiring about pricing). For transcript requests, please contact Adrian Baule at [Adrian\\_Baule@casd.uscourts.gov](mailto:Adrian_Baule@casd.uscourts.gov).

## II. Discovery

Counsel must contact the assigned magistrate judge's chambers directly for all matters pertaining to discovery. Any objection to a discovery ruling of the magistrate judge pursuant to Federal Rule of Civil Procedure 72(a) must comply with the motion requirements set forth in Civil Local Rule 7.1.

## III. Motion Practice

- A. Conference of Counsel Prior to Filing Noticed Motions.** Any party contemplating the filing of any noticed motion before this Court must first contact opposing counsel to discuss thoroughly—preferably in person—the substance of the contemplated motion and any potential resolution. The conference must take place at least **seven (7) days** prior to the filing of the motion. If the parties are unable to reach a resolution that eliminates the need to file the anticipated motion, counsel for the moving party must include in the notice of motion a statement to the following effect: “This motion is made following the conference of counsel that took place on [date].”

The only exceptions to this meet-and-confer requirement are: (1) in cases where the plaintiff is appearing pro se and is not an attorney; (2) for applications for temporary restraining orders or preliminary injunctions; and (3) motions and cross-motions for summary judgment. Ex parte applications which have separate requirements below, and joint motions are exempt from this rule as they are not noticed motions.

- B. Motion Hearing Dates & Oral Argument.** Parties filing a noticed motion may choose any **Monday** between **thirty (30) and sixty (60) days** from the motion's filing date.<sup>1</sup> If the preferred Monday is a federal holiday, then the filing party may select the following Tuesday as the hearing date for the motion. Parties intending to file a motion may **not** contact chambers for a hearing date. This rule supersedes the requirement of Civil Local Rule 7.1(b). Opposition and reply briefs are due based on the noticed hearing date. *See* CivLR 7.1(e). The hearing date does not indicate a date for when appearances are necessary; rather, it sets the briefing schedule for the motion pursuant to the applicable local rules including Civil Local Rule 7.1(e).

In the caption of its notice of motion and motion, the moving party shall include the selected hearing date and the following: **NO ORAL ARGUMENT UNLESS ORDERED BY THE COURT**. If the Court decides that oral argument will assist it in deciding the

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<sup>1</sup> For example, if a party files its motion on Friday, April 1, 2022, then the earliest Monday it may select as the hearing date is Monday, May 2, 2022—because that Monday is more than thirty (30) days after the filing date. The party may also select Monday, May 9, 2022; Monday, May 16, 2022; or Monday, May 23, 2022, as the hearing date. Finally, Monday, May 30, 2022, is within sixty (60) days from the filing date, but that Monday is a federal holiday. So, the party may select Tuesday, May 31, 2022, as the last possible hearing date.

motion, the Court will issue an order setting forth the date and time for oral argument. In other words, oral argument will not occur unless ordered by the Court in its discretion.

Parties must contact the assigned magistrate judge's chambers for hearing and scheduling dates needed for cases referred to a magistrate judge either by operation of local rule or by order. *See* CivLR 72.3.

Motions that do not comply with the requirements set forth above will be stricken from the docket.

- C. Statement of Non-Opposition, Failure to Oppose.** A party that determines that it will not oppose a given motion shall file a statement of non-opposition no later than fourteen (14) days before the hearing date. An opposing party's failure to file a memorandum of points and authorities in opposition to any motion will be construed as consent to the granting of the motion pursuant to Civil Local Rule 7.1(f)(3)(c).
- D. Sur-Replies and Notices of Supplemental Authority.** Sur-replies and notices of supplemental authority may not be filed without leave of Court, unless there is a subsequent change in binding law that is directly on point. Under these circumstances, the party may file a notice of supplemental authority that includes a copy of the order or opinion and any case-identifying information. Counsel may not include any argument in the notice.
- E. Courtesy Copies.** No courtesy copies are necessary for any filing.
- F. Exhibits.** All exhibits submitted in support of motions should be excerpted to include only relevant material. All exhibits must be clearly labeled, dated, tabbed, and indexed. Copies of pleadings, motions, and/or Court orders already contained on the electronic docket should not be included as exhibits. Such documents should be clearly cited in the text of the motion referencing the docket number of the document cited and the ECF generated page number for pinpoint cites, enabling the Court to quickly locate the location of the cited material (*e.g.*, Doc. No. \_\_\_ at \_\_\_).

The parties must avoid duplication of exhibits as much as possible. If the same exhibit is referred to in more than one motion noticed for the same day, the exhibit should be filed only once. Similarly, if more than one party refers to the same exhibit relative to a motion noticed for the same day, only one party should file the exhibit. The parties must use precise citations to assist the Court in locating all exhibits and the pertinent portions of those exhibits.

Unless the physical nature of the exhibit renders it impracticable, exhibits must be attached to the documents to which they belong. Each exhibit should be submitted in CM/ECF as a separate attachment. (For example, if a party is filing five exhibits to Document Number 10, the exhibits should be filed as Doc. 10-1, 10-2, 10-3, 10-4, and 10-5.)

**G. Proposed Orders.** Any proposed orders must be submitted simultaneously with all motions. In accordance with Section 2(h) of the ECF Manual, proposed orders must not contain the name and law firm information of the filing party, and must not contain the word “proposed” in the caption. Counsel must email proposed orders in Word format to [efile\\_montenegro@casd.uscourts.gov](mailto:efile_montenegro@casd.uscourts.gov) and include the case number, case name, and identify the motion(s) to which the proposed order corresponds in the subject line of the email. Proposed orders or other documents requiring the judge’s signature must not be filed on the docket.

**H. Motions to Amend the Pleadings.** Before filing any motions to amend the pleadings, counsel shall meet and confer in good faith regarding the proposed amendment. To facilitate this process, the party seeking to amend their pleading shall provide opposing counsel with a copy of the proposed amended pleading along with an explanation of the reasons for the amendment. If counsel are unable to reach agreement regarding the proposed amendment, counsel filing the motion to amend shall attach a declaration to the motion documenting counsels’ meet and confer efforts. Counsel **must** attach as an exhibit a redline from the operative pleading to the new pleading or the Court may strike the motion and proposed amended pleading.

**I. Motions for Summary Judgment.** Ten (10) days before the hearing date, the parties shall meet and confer to arrive at a joint statement of disputed and undisputed facts, which shall be filed no later than the reply brief. The Court will not consider any separate statements of disputed or undisputed facts.

#### **IV. Seeking Leave to File Documents Under Seal**

**A. Standard.** There is a presumptive right of public access to court records based upon common law and First Amendment grounds.<sup>2</sup> As such, motions to file documents under seal are strongly discouraged. The fact that both sides agree to seal a document or that a stipulated protective order was issued is insufficient cause for sealing.

Even where a public right of access exists, such access may be denied by the Court in order to protect sensitive personal or confidential information.<sup>3</sup> The Court may seal

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<sup>2</sup> See *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 597 (1978); *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1096 (9th Cir. 2016).

<sup>3</sup> Although courts may be more likely to order the protection of the information listed in Rule 26(c)(7) of the Federal Rules of Civil Procedure, courts have consistently prevented disclosure of many types of information, such as letters protected under attorney-client privilege which revealed the weaknesses in a party’s position and were inadvertently sent to the opposing side, *see KL Group v. Case, Kay, and Lynch*, 829 F.2d 909, 917-19 (9th Cir. 1987); medical and

documents to protect sensitive information; however, the documents to be filed under seal will be limited by the Court to only those documents, or portions thereof, necessary to protect such sensitive information.

**B. Procedure.** Any document submitted for filing under seal (including motions, responses, declarations, exhibits, etc.) must be accompanied by a motion authorizing such filing. The motion to seal will be a public entry on the docket and will be available to the public, in accordance with Section 2(j) of the Southern District of California’s Electronic Case Filing Administrative Policies and Procedures Manual (“ECF Manual”).

The motion to seal must provide the Court with a specific description of the particular documents or categories of documents to be protected, including, for each document subject to the motion, whether the moving party seeks to seal the document in full or in part (i.e., with redactions). The motion to seal must be accompanied by declaration(s) from individual(s) with knowledge of the content of the documents demonstrating a compelling reason or good cause to protect those documents from disclosure. The standard for filing documents under seal will be strictly applied.

After filing a motion to seal, the moving party must immediately file the proposed sealed documents in CM/ECF using the “Sealed Lodged Proposed Document” in accordance with Section 2(j) of the ECF Manual. If the moving party seeks to seal the document in full, the document should be lodged in full, without redactions. If the moving party seeks to seal only portions of the document by using redactions, the document should be lodged with the alleged confidential or privileged information **highlighted** in yellow for the Court’s consideration.

The party requesting a sealing order must also file a “public” version of the document(s) it seeks to file under seal. For each document the moving party seeks to seal, the party may redact only that information that is deemed confidential or privileged. If the moving party has sought an order to seal the document in full, the party should file a slip sheet making clear for the Court that the document is subject to the motion to seal. If the moving party has sought an order to seal only portions of the document, the party should file the document with the alleged confidential or privileged information redacted.

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psychiatric records protected under state law confidentiality privilege, *see Pearson v. Miller*, 211 F.3d 57, 62-64 (3rd Cir. 2000); and federal and grand jury secrecy provisions, *see Krause v. Rhodes*, 671 F.2d 212, 216 (6th Cir. 1982). Courts in this Circuit have also granted protective orders to protect confidential settlement agreements upon the requisite standard of either good cause or compelling reasons, depending on whether the motion is more than tangentially related to the merits of the case. *See Phillips ex rel. Ests. of Byrd v. Gen. Motors Corp.*, 307 F.3d 1206, 1212 (9th Cir. 2002).

Parties often seek to seal a document only because another party designated the document as sensitive under a protective order, including with a “confidential” or “attorneys’ eyes only” designation. In these circumstances, the moving party must first meet and confer with the designating party to determine whether the designating party maintains that any portion of the document must be filed under seal. If so, the moving party must file a motion to seal. In addition, the designating party must file a response to the sealing motion within **seven days** that satisfies the sealing standard described above. If no response is filed, the Court may order that the document be filed in the public record.

**V. Temporary Restraining Orders**

All motions for temporary restraining orders shall be briefed. While temporary restraining orders may be heard ex parte, the Court will do so only in extraordinary circumstances. The Court’s strong preference is for the opposing party to be served and afforded a reasonable opportunity to file an opposition. In appropriate cases, the Court may issue a limited restraining order to preserve evidence pending further briefing. The Court will generally give notice of hearing by telephone.

**VI. Ex Parte Applications**

Before filing any ex parte application, counsel must contact the opposing party to meet and confer regarding the subject of the ex parte application. All ex parte applications must comply with Civil Local Rule 83.3(g) including a declaration from the movant documenting: (1) efforts to contact opposing counsel; (2) counsel’s good faith, in person or by telephone meet-and-confer efforts to resolve differences with opposing counsel; and (3) opposing counsel’s general position regarding the ex parte application. Any ex parte application filed with the Court must be served on opposing counsel via electronic mail with return receipt requested, or overnight mail. Failure to comply with these rules may result in the Court striking the ex parte application.

Ex parte applications that are not opposed within **three (3) Court days** may be considered unopposed and granted on that ground. The opposing party must immediately notify chambers that they intend to oppose the ex parte application. Replies to any opposition will not be considered unless otherwise ordered by the Court.

**VII. Final Pretrial Conference**

Plaintiff(s) must lodge the proposed final pretrial conference order with the Court a week before the final pretrial conference, unless otherwise specified in the Court’s Scheduling Order or other orders. The final pretrial conference order must strictly comply with Civil Local Rule 16.1(f). At the final pretrial conference, the Court may identify errors in the parties’ final pretrial conference order and other materials. The parties must revise and re-lodge those materials as soon is reasonably practicable.

## VIII. Trial

Trial must be so prepared and conducted as to minimize disruption and maximize concentration on the evidence and the witnesses. The following special procedures are intended to further this objective and apply in this Court. These are in addition to and supplement other applicable Local Rules.

- A. Trial Dates.** Trial will generally be set for approximately a month after the final pretrial conference before Judge Ruth Bermudez Montenegro in Courtroom 5B. Trial may be set at a later time depending on the circumstances of the case. Trial will normally be conducted each day from 9:00 a.m. to approximately 4:30 p.m., with one longer break for lunch (from approximately 11:45 a.m. to 12:45 p.m.) and two shorter breaks, one in the morning and one in the afternoon. This schedule may be modified at the discretion of the Court.

### **B. Motions in Limine.**

**Meet and Confer Obligation.** Before filing any motions in limine, parties are required to meet and confer in an attempt to resolve their dispute. If the parties are unable to resolve their differences, counsel filing the motion in limine shall attach a declaration documenting the parties' meet and confer efforts and the reason for their failure to reach an agreement.

**Briefing.** A briefing schedule for motions in limine will be set at the final pretrial conference. Generally, motions in limine will be heard two weeks before trial unless otherwise ordered by the Court given the circumstances of the case. Such motions must be filed and served three weeks before the scheduled hearing date, with oppositions due two weeks before the hearing. Each side is limited to a maximum of five (5) motions in limine. Each motion in limine must be filed separately on the docket. Each motion in limine and each opposition shall not exceed ten (10) pages in length. Attachments to any motion in limine or opposition shall also be limited to ten (10) pages in length. No replies shall be filed unless directed by the Court.

If the case involves multiple plaintiffs or multiple defendants, only one brief per motion in limine *per side* will be accepted. Unless the parties obtain leave of Court to exceed the limitations contained herein prior to filing, multiple filings and filings that exceed the page limitations will be stricken.

### **C. Evidence and Exhibits.**

The Court will order counsel to prepare a joint exhibit list due on the same day as the proposed final pretrial conference order, such that all exhibits that may be used at trial appear on one list. All exhibits must be numbered continuously and not lettered. Counsel may agree to number ranges (e.g., Plaintiff has 1–100 and Defendant has 101–200) for their respective uses. A sample of the Court's preferred exhibit list form is attached to these Civil Chambers Rules as **Exhibit A**. Exhibits omitted from the final pretrial order are subject to exclusion at trial, true impeachment exhibits excepted.

In preparing the joint exhibit list, counsel must avoid duplication of exhibits. For example, a contract in dispute should only be marked as one exhibit, with all sides to utilize that same exhibit at trial. Counsel should also note which exhibits they have stipulated the admissibility of, if any.

Before the start of trial, counsel must mark all exhibits contained in the parties' joint exhibit list with an exhibit tag and number, which shall be placed at the bottom right-hand corner of each exhibit. Each exhibit tag will ideally be in a color that stands out, such as bright yellow. Should the parties have logistical questions about the marking or format of exhibit numbers, the parties are instructed to contact the courtroom deputy for further instructions.

Counsel should waive authentication objections where authentication is not at issue. Counsel should note this on the trial exhibit list.

Hard copy exhibits may not be passed among the jury during trial. If counsel wish the entire panel to examine a particular exhibit prior to deliberations, they should either provide blowups or use the Court's visual equipment.

Once the parties' joint exhibit list is finalized in the manner detailed in this Order, the parties are instructed to provide the Court with four courtesy Copies of each exhibit, organized in binders for the Court's use and review during trial. The parties must also provide three thumb drives of all exhibits to the Court. Such courtesy copies should be delivered to the Court no later than five (5) days prior to trial.

At the end of each trial day, counsel is expected to confer with each other and with the courtroom deputy regarding which exhibits are in evidence and any limitations with respect to any admitted exhibits. Any disputes must be promptly brought to the Court's attention.

Before the jury begins deliberations, counsel must prepare an index of all exhibits admitted into evidence. Such index should include the exhibit number and a brief, nonargumentative description of each exhibit (e.g., January 1, 2019 Letter from J. Doe to J. Doe).

All exhibits to be entered into evidence must be submitted on a thumb drive prior to jury deliberations. Digitized exhibits must also be branded with an exhibit tag and number in the same manner as describe in the first paragraph of this section.

**D. Voir Dire.** The Court's Civil Jury Questionnaire provided to prospective jurors is attached to these Civil Chambers Rules as **Exhibit B**.

After the jury panelists are sworn in, the Court will question the panelists to determine each individual's suitability for jury service, including whether each panelist can remain fair and impartial. If counsel wish to expand the scope of the Court's initial voir dire, counsel should prepare a joint list of written questions for the Court's consideration, which must be lodged no later than seven (7) days before trial.

Counsel will each be allowed a brief (no more than 15 minutes) follow-up voir dire after the Court's questioning. Counsel's questions must be calculated to discover bias or prejudice with respect to the circumstances of this case. Repeating the questions already asked by the Court, or asking questions attempting to precondition the jury to a party's position, will not be allowed.

After each counsel has completed their examination of the panel, and after hardships and challenges for cause have been ruled on by the Court, the parties may exercise their peremptory challenges. The Court uses a double-blind strike format. The peremptory challenges are directed to all panelists remaining after the disposition of challenges for cause. A challenge sheet is passed to each party (side) and each party (side) will record their peremptory challenges. After the challenges have been exercised, the lists will be shared with all counsel. The first eight panelists remaining (or another number fixed by the Court), in the order in which they were seated, will constitute the jury. After all challenges and objections, the Court will announce those selected and will then thank and excuse the remaining prospective jurors.

#### **E. Jury Instructions.**

Parties are required to meet and discuss proposed jury instructions prior to their submission to the Court.

Parties must file joint proposed jury instructions at the same time as the proposed final pretrial conference order unless otherwise ordered by the Court. The parties shall also email the instructions in Word format to the Court's email address at [efile\\_montenegro@casd.uscourts.gov](mailto:efile_montenegro@casd.uscourts.gov).

Counsel shall prepare a joint set of proposed instructions, arranged in a logical sequence, including any form preliminary instructions to be read at the beginning of trial, general instructions to be read at appropriate times during trial, proposed instructions on substantive issues of law, and concluding instructions. The parties are expected to work cooperatively and keep disputed instructions to a minimum.

With respect to form preliminary instructions, general instructions, or concluding instructions, counsel shall include in their joint packet the full text of these instructions with citation to the Ninth Circuit Manual of Model Civil Jury Instructions and/or the Judicial Council of California Civil Jury Instructions ("CACIs"). If the form instructions contain bracketed language or blanks, the parties should provide the Court with the appropriate language from the brackets, and all blanks should be completed. This new language shall be written in **bold** font.

With respect to instructions on substantive issues of law:

If the instruction is undisputed, the instruction shall be identified as "Stipulated Instruction No.    re   ." Even if the parties stipulate to the instruction, each instruction should be accompanied by a citation to the Model Civil Jury Instructions and/or other authority.

If the instruction is disputed, each party's version of the instruction shall be submitted together in their logical place in the overall sequence of jury instructions. Each disputed instruction shall be identified as "Disputed Instruction No. \_\_\_ re \_\_\_ Offered by \_\_\_," with the blanks and brackets filled in as appropriate. This new language shall be written in **bold** font. All disputed versions of the same instruction shall bear the same number. If the parties modify a form instruction, they must clearly identify such modifications in **bold** or **redlined** format, or in some other manner that makes it clear to the Court what modifications are proposed. The Court will strike any instruction that fails to bold modified language. If one party offers an instruction and the opposing party does not have a counter version to that instruction (and simply contends that no such instruction in any version should be given), that party should so state on a separate page inserted in logical sequence in lieu of an alternate version, providing the reason(s) for that party's opposition.

- F. Deposition Designations.** Deposition designations are due at the time of the proposed final pretrial conference order unless otherwise ordered by the Court. Parties shall designate, for deposition transcripts and deposition videos, the page and line and/or sections they plan to seek to admit at trial.
- G. Verdict Forms.** Verdict forms, including special verdict forms, are due at the time of the proposed final pretrial conference order unless otherwise ordered by the Court. Counsel must meet and confer to prepare a joint proposed verdict form. Counsel should lodge their joint proposed verdict form, or separate proposals in the event they cannot agree on a joint proposed verdict form.
- H. Opening Statements.** Each side will have a predetermined time limit for its opening statement. Counsel must meet and confer to exchange any visuals, graphics, or exhibits to be used in opening statements and allow time for reasonable revisions. The parties are strongly encouraged to work cooperatively to resolve any disputes regarding opening statements without Court intervention. To the extent the parties are unable to resolve objections to opening statements, the parties must jointly contact the Court no later than three days before trial and request a status conference to resolve the dispute.
- I. Witnesses.** At the close of each trial day, counsel shall exchange a list of witnesses for the following court day. The parties shall have all upcoming witnesses on the same day available in the courthouse and ready to testify.
- J. Stipulations.** Counsel must read to the jury all stipulated facts as detailed in the parties' proposed final pretrial order for such stipulated facts to become part of the record. Upon request by counsel, the Court may also read to the jury the stipulated facts. Prior to trial, counsel should jointly prepare an exhibit listing such stipulated facts, which will be sent to the jury during deliberations.
- K. Side Bar.** To maximize time with the jury, the parties are encouraged, where possible, to limit side bar discussions with the Court. If there are issues that must be addressed outside the presence of the jury, the Court shall address those issues either during a break, in the morning before the jury arrives, or once the jury departs at the end of the day.

**L. Interpreters.** If an interpreter is needed for witnesses, please make these arrangements in advance. Interpreters must be certified and approved by the Court.

**M. Translation of Documents.** Any exhibit that is in a language other than English must be accompanied by a translated English version performed by a certified interpreter. Both the original document and the translated English document shall be included together as one exhibit. Any translations should be lodged to the Court along with the parties' joint exhibits.

**N. Audio/Visual Equipment.** The parties are encouraged to schedule a time to visit the courtroom prior to trial to ensure familiarity and compatibility with all audio and visual equipment. Counsel may contact the courtroom deputy to schedule a time to visit the courtroom for such purpose.

**IX. Settlement**

If the parties settle a case, counsel must immediately notify this Court and the magistrate judge of the settlement. Unless a "Notice of Dismissal" is filed under Federal Rule of Civil Procedure 41(a)(1), for which a court order is not required, the parties must file a "Joint Motion to Dismiss" and email the proposed order to this Court within twenty-eight (28) days of the settlement.

## EXHIBIT A

### Preferred Exhibit List Formal

*Example exhibit included below.*

#### Exhibit Chart

Exhibit No.	Offered By (P/D)	Description	Basis of Objection(s)	Response to Objection(s)	Court Ruling
1	P	BATES000001 – January 1, 2019 Letter from J. Doe to J. Doe	Hearsay	Not offered for truth of the matter asserted; offered for XYZ.	

**EXHIBIT B**  
**Civil Jury Questionnaire**

Please answer the following questions when directed to do so by the Court. **Do not write on this paper.**

1. State your name.
2. State your city of residence and how long you have lived there.
3. State how long you have lived in California.
4. State your occupation. **(If retired or unemployed, state your previous occupation(s).)**
5. State your marital status.
6. If married, state your spouse's occupation. **(If separated, divorced, widowed, or retired, please state what his/her occupation is/was. If self-employed, please state what type of employment.)**
7. If you have children, state their ages and the occupation of any adult children.
8. Have you, any immediate family member or close friend ever been involved in law, such as a lawyer or judge?
9. If you have had previous jury service, including grand jury service, **state where and when you were a juror.** Also state whether the case(s) was civil or criminal. Did the jury return a verdict? **Do not state what the verdict was.**
10. Have you, any immediate family member, or close friend ever been a party or a witness to any lawsuit?
11. Will you follow the law as given to you by the Court?
12. Is there any reason why you could not be fair and impartial in a case of this nature?