

## **Shortcut to Voir Dire**

1. Introduce yourself and client.
2. Short statement of purpose: "As the Judge told you, we need to ask you about your opinions and feelings to find out who should serve on the jury for this case."
3. Ask "hands up" question (first attorney only).
4. Statement of fear linking it to case. Example: "You will hear about the sale of alcohol in this case."
5. Ask for the bad answer. Example: "Who here has negative feelings about stores who are in the business of selling alcohol?"
6. Ask the first one what his opinion is. If stated very strongly, gently affirm his feelings with a series of questions, pushing him to commit fully to the fact he cannot disregard them and have him agree that he cannot follow judge's instructions, putting opinion out of his mind and basing decision only on the evidence heard in court.

If his opinion seems "weaker", ask if he will be able to put his feelings out of his mind and base his decision only on the evidence he hears in court.

7. Then ask group who else feels the same way. Example: "Who else has negative feelings about stores that sell alcohol?"
8. Ask each one who responds, what their opinion is and whether they can base their verdict only on the evidence presented in this case. If anyone states a very strong opinion, return to gently affirming his opinions until he says he cannot follow judge's instructions.
9. If no one raises his hand, talk to those who have not raised their hands, in order beginning with potential juror no. 1, asking what he thinks. Then ask potential juror no. 2 what he thinks. Then ask rest of row (as a group), if anyone has a negative opinion about your fear. Then go to second row and ask a couple of people there, then ask rest of row as a group. *(Point of this manner of questioning is to speak to all jurors either individually or as a row who may be on your jury.)*