

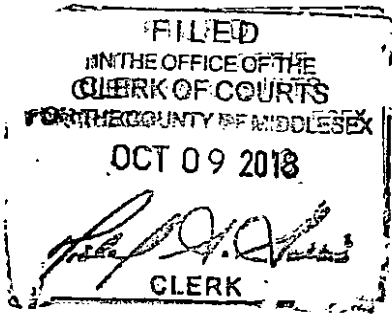
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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO. 2013-2934 B

| | |
|--------------------------|---|
| _____ |) |
| PLAINTIFF ERICKSON |) |
| |) |
| Plaintiff, |) |
| |) |
| v. |) |
| |) |
| ROSALIE A. CUNIO, |) |
| JASON J. CUNIO, |) |
| AND CHRISTOPHER J. CUNIO |) |
| |) |
| Defendants. |) |
| _____ |) |



PLAINTIFF CATHERINE ERICKSON'S MOTION FOR PRECHARGE

NOW COMES the Plaintiff, Catherine Erickson, and moves this Honorable Court to provide the jury an abbreviated pre-charge on law relevant to this case before the Jury Voir Dire is conducted, so that the venire will have some idea of the issues involved and can provide intelligent answers to questions to determine whether they will be able to be fair and impartial if seated as jurors on this case. [See, Plaintiff's Requested Pre-Charge Instructions, attached hereto as Ex. 1]

This is particularly important because some jurors firmly believe that proof beyond a reasonable doubt should be required in civil cases. Some jurors firmly believe that compensation should not be awarded for mere negligence, but only for grossly negligent or intentional misconduct. Some jurors firmly believe that compensation should be limited to tangibles such as medical expenses and lost wages.

*1/7/19.
 Allowed in that court will pre-charge briefly
 before empanelment and then prior to evidence.
 [Signature] J.*