

51.1 Proposed Jury Instructions.

- (a) When Filed and Submitted.** Unless ordered otherwise, each party must file requested instructions 7 days before the first day of trial. In addition, a party should submit requested instructions in a word processing format on a CD delivered, or through an e-mail addressed to, the trial judge's chambers. A party may file and submit to the trial judge additional requested instructions relating to matters arising during the trial at any time before the trial ends.
- (b) Objections.** Objections to requested jury instructions, with supporting authority, must be filed at least 3 days before the first day of trial.
- (c) Form.** Each requested instruction must be numbered, state the presenting party, and cite the instruction's source and any additional supporting authority. Parties must use the latest edition of the Eighth Circuit Model Jury Instructions whenever possible. If a submitted instruction is modified from the pattern instruction, deleted material must be in parentheses and additions must be underscored. Requests for routine instructions are unnecessary and should not be filed.