

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

JURY INSTRUCTION NO.

The Court instructs the Jury that you may consider the following factors in determining the amount of damages, if any, to be awarded to the Plaintiff, . These may be shown by the preponderance of the Evidence:

- (a) The type of injuries to the Plaintiff and the length of their duration;
- (b) Past and present physical pain and suffering;
- (c) Future physical pain and suffering, if any;
- (d) Past and present resulting mental anguish, if any;
- (e) Future resulting mental anguish, if any;
- (f) Reasonable medical expenses incurred;
- (g) Medical expenses reasonably certain to be incurred in the future if any;
- (h) Lost earnings proximately resulting from Plaintiff's injuries; and
- (i) Any future disability that is reasonably certain to occur, if any, its duration and its effect, if any, on the plaintiff's future earning capacity. In arriving at the amount of your award, if any, for any loss of future earning capacity, you should consider what the plaintiff's health, physical ability, age, and earning power or capacity were before the injury and the effect of the plaintiff's injuries, if any, upon them.