PLAINTIFF

VS.

NO.

DEFENDANT

JURY INSTRUCTION NO.

In considering the amount of your award of damages to the Plaintiff, , if any, you may take into account and so consider the following measures or elements of damage, or such of them as you find from a preponderance of the evidence to have been suffered by Plaintiff.

1. Pain and suffering of the Plaintiff, if any.

2. The cost of medical expenses and doctor and drug bills, reasonable and necessary to treat Plaintiff, , condition, if any.

3. Lost wages, if any.