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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,)
16 Plaintiff,)
17 v.)
18 BARRY LAMAR BONDS,)
19 Defendant.)
20)
21)

No. CR 07-0732 SI

PROPOSED JURY INSTRUCTIONS

Trial: March 2, 2009
Time: 8:30 a.m.
Court: Hon. Susan Illston

22 The government respectfully requests that the Court charge the jury with the following
23 jury instructions attached hereto in addition to those already identified in the Court's Second
24 Order for Pretrial Preparation. Leave is respectfully requested to include such other additional
25 instructions as may become appropriate during the course of the trial.

26 Depending on the evidence adduced at trial, some of the instructions included herein may
27 not be appropriate, and some additional instructions may be required. The government
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PROPOSED JURY INSTRUCTIONS
CR 06-0732 SI

1 respectfully reserve the right to request additional jury instructions or modifications of the
2 attached instructions at trial.

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DATED: February 13, 2009

Respectfully submitted,

JOSEPH P. RUSSONIELLO
United States Attorney

/s/
MATTHEW A. PARRELLA
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TABLE OF JURY INSTRUCTIONS

**NINTH CIRCUIT
MODEL JURY**

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<u>NO.</u>	<u>INSTRUCTIONS</u>	<u>DESCRIPTION</u>
1	1.12	OUTLINE OF TRIAL
2	2.2	BENCH CONFERENCES AND RECESSES
3	2.3	STIPULATED TESTIMONY
4	2.4	STIPULATIONS OF FACT
5	2.5	JUDICIAL NOTICE
6	2.7	TRANSCRIPT OF RECORDING IN ENGLISH
7	3.12	SEPARATE CONSIDERATION OF MULTIPLE COUNTS
8	4.1	STATEMENTS BY DEFENDANT
9	4.3	OTHER CRIMES, WRONGS OR ACTS OF DEFENDANT
10	4.9	TESTIMONY OF WITNESSES INVOLVING SPECIAL CIRCUMSTANCES – IMMUNITY, BENEFITS, ACCOMPLICE, PLEA
11	4.17	OPINION EVIDENCE, EXPERT WITNESS
12	5.6	KNOWINGLY
13	7.6	COMMUNICATION WITH COURT
14	8.112	FALSE DECLARATION BEFORE GRAND JURY
15	Special #1	OBSTRUCTION OF JUSTICE