

812.05 ANIMALS - LIABILITY OF OWNER OF DOG WHICH INJURES, KILLS
OR MAIMS LIVESTOCK OR FOWL.

The (*state number*) issue reads:

"Was the plaintiff damaged by the [injury] [killing] [maiming] of *his*
[livestock] [fowl] by the defendant's dog?"

On this issue the burden of proof is on the plaintiff. This means
that the plaintiff must prove, by the greater weight of the evidence, four
things:

First, that the defendant [owned] [was in charge of] (*identify dog*).

Second, that (*identify dog*) [injured] [killed] [maimed] the plaintiff's
(*describe livestock or fowl*).

Third, that the plaintiff's (*describe livestock or fowl*) [was] [were]
not on the defendant's premises at the time of the [injury] [killing]
[maiming].

Fourth, that the plaintiff sustained damages as a result of the
[injury] [killing] [maiming].

Finally, as to this issue on which the plaintiff has the burden of
proof, if you find by the greater weight of the evidence that the plaintiff
was damaged by the [injury] [killing] [maiming] of *his* [livestock] [fowl]
by the defendant's dog, then it would be your duty to answer this issue
"Yes" in favor of the plaintiff.

If, on the other hand, you fail to so find, then it would be your duty
to answer this issue "No" in favor of the defendant.