

Federal Rule of Evidence 606(b) Bars Admission of Testimony About Juror Statements During Deliberations to Show Dishonesty During Voir Dire

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On December 9, 2014, the Supreme Court of the United States issued its unanimous decision in *Warger v. Shauers*, holding that Federal Rule of Evidence 606(b) bars most testimony from jurors regarding statements made during deliberations when the testimony is offered in "an inquiry into the validity of a verdict or indictment." While the Court recognized that there were some exceptions to the Rule, they found that Plaintiff failed to satisfy them.

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