

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 21-cv-21940-BLOOM/Torres

NEIMA BENAVIDES, as Personal Representative
of the Estate of Naibel Benavides Leon, deceased,

Plaintiff,

v.

TESLA, INC., a/k/a Tesla Florida, Inc.,

Defendant.

_____ /

DILLON ANGULO,

Case No. 22-22607-KMM

Plaintiff,

v.

TESLA, INC. a/k/a Tesla Florida, Inc.,

Defendant.

_____ /

**TESLA, INC.'S OBJECTIONS TO PLAINTIFFS' NOTICE OF INTENT TO USE
DEPOSITIONS AT TRIAL AND COUNTER-DESIGNATIONS**

Pursuant to Federal Rule of Civil Procedure 32 and this Court's Order Scheduling Trial and Order of Instructions Before Calendar Call (Doc. 410), Defendant Tesla, Inc. hereby files its objections and counter-designations Plaintiffs' Notice of Intent to Use Depositions at Trial and Counter-Designations (Doc. Nos. 421-427):

1. **Eloy Rubio Blanco**¹

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
7:14-8:15		

¹ To the extent all or some of Mr. Blanco's deposition testimony is allowed to be either read in by transcript or video, Tesla requests that the Court treat all designated testimony as "confidential" subject to the terms of the Confidentiality Protective Order [Doc. 126].

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
8:24-9:16		
9:19-10:8		
11:6-11		
12:3-24		
13:17-23		
15:17-23		
16:4-22		
17:2-22		
17:25-18:2		
18:6-8		
18:20-24		
19:5-12		
19:23-20:5	Relevance FRE 401 and 403	
21:22-22:3		
22:19-23		
23:7-25:3		
25:6-26:3		
26:7-18		
26:21-27:2		

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
30:13-19	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
30:22-31 :17	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
31:24-32:5	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
32:7-8	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
32:11-20	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
32:23-33:1		
33:22-36:3		

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
36:5-14		
36:18-37:11		
37:16-22		
38:11-14		
38:16-39:3		
39:6-8		
39:24-40:3		
40:6-18		
41:15-16		
41:19-42:10		
42:13-23		
43:1-7		
		43:8-25
		44:1-25
		45:1-25
		46:1-3
		46:6-25
		47:1-25
		48:1-8
51:20-52:16		

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
62:2-14		
62:17-63:5		
63:11-20		
64:1-65:17		
65:19		
65:22-67:1		
67:3		
67:6-69:2		
70:8-15		
72:2-4		
72:22-73:1		
73:8-9		
73:14-20		
75:1-76:5		
76:11-18		
76:25-77:4		
77:16-77:25		
78:2-8		
78:13-79:1		
79:25-80:5		

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
80:7-14		
80:20-81 :21		
2:10-83:4		
83:9-85:8		
85:11-86:17		
86:20-22		
87:16-18	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to Mr. Musk's public statements	
87:22-24	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to Mr. Musk's public statements	
88:3-8	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to Mr. Musk's public statements	
88:10-89:9	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to Mr. Musk's public statements	
89:11	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to Mr. Musk's public statements	

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
89:13	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to Mr. Musk's public statements	
89:20-24	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to Mr. Musk's public statements	
90:12-17		
91:1-20		
91:24		
92:4-21		
93:2-6		
95:4-10		
95:25-96:11		
96:14-16		
98:6-11		
98:13-99:24		
101:10-25	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	

Witness: ELOY RUBIO BLANCO Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
102:6-13	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
102:20-103:10	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
103:13-104:1	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
104:3	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
104:6-105:11	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
105:15-20	105:1-17 Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to government investigations and subsequent remedial measures/recall	
106:23-107:2		
107:9		
107:14-23		
107:25-108:8		
111:10-20		
113:19-114:5		
114:8-115:12		
120:21-121:10		
121:17-20		
123:16-25		
124:11-15		
124:22-125:10		
126:13-20		
127:1-7		
128:17-129:4		
129:16-21		

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
129:23-130:18		
		130:19-25
		131:1-21
131:23-133:12		
135:3-24		
		135:24
		136:1-12
136:13-137:10		
137:17-138:2		
140:23-141:2		
141:5-22		
142:5-20		
143:1-17		
151:2-21	Form. Misstates the document that Schreiber was quoting from	
152:1-15		
154:1-12	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	

Witness: ELOY RUBIO BLANCO Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
154:25-156:8	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	
158:10-159:22		
160:23-161 :22		
162:15-16		
164:18-165:13		
166:8-167:1		
172:23-173 :8		
174:10-21		
175:12-23		
176:3-23		
177:2-18	Form. Question mischaracterizes – takes out context – statement of E. Musk and emails referenced in question.	
177:21-178:2	Form. Question mischaracterizes – takes out context – statement of E. Musk and emails referenced in question.	
178:5-179:5		
179:17-180:13		
180:16-182:2		

Witness: ELOY RUBIO BLANCO Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
182:18-184:10		
184:14-185:5		
185:17-186:5		
186:7		
186:25-188:13		
188:16-189:15		
193:13-20		
194:6		
194:15-195:10		
195:16-22		
197:19-25		
198:6-15		
198:17-199:5		
199:7-200:12		
200:15-201:3		
201:6-203 :2		
203:4-9		
203:13		
203:18-204:6		
		204:7-12

Witness: ELOY RUBIO BLANCO		
Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
218:2-11		
218:15-219:13	Hearsay FRE 802	
		218:21-25
		219:1-13
		220:3-25
		221:1-11
221:12-18		
221:21-24		
		228:17-25
		229:1-25
		231:17-22
		232:4-25
240:12-241:4		
241:12-242:6		
242:11-243:2		
243:19-245:3		
245:16-246:13		
246:16-22		
247:3-6		
247:8-11		

Witness: ELOY RUBIO BLANCO Deposition taken on May 31, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
247:16-249:5		
251:10-252:12		
		263:22-25
		264:1-17
270:3-11		
271:11-272:12		
272:17-23	Calls for expert opinion by fact witness	
273:6-274:2	Calls for expert opinion by fact witness	

2. **Barry Crown, M.D.**

Witness: BARRY CROWN, M.D. Deposition taken on February 4, 2025		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
		6:7-12
		6:15-20
		17:18-22
		18:8-12
		18:19-19:7
		19:14-17
		20:4-7

Witness: BARRY CROWN, M.D.		
Deposition taken on February 4, 2025		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		23:14-18
		25:11-22
		29:7-21
		29:23-30:1
		34:9-16
		34:25-35:6
		35:21-25
		36:11-37:3
		37:17-24
		38:16-18
		39:5-8
		39:13-25
		40:25-41:12
		41:17-42:16
		49:11-50:14
		62:13-21
107:5-17		
		146:16-147:10

3. **Rafael Fernandez, Jr., M.D.**

Witness: RAFAEL FERNANDEZ, JR., M.D. Deposition taken on August 13, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
		8:19-20
		8:22-23
		8:25
		9:2-4
		9:6
		9:8-11
		9:17-19
		15:2-15
18:17-19:1		
		31:12-14
		31:17-21
		35:1-3
		35:5-9
		35:11-15
		35:17-19
		36:2-16
		36:18-24
		37:14-21
38:10-17		38:24-39:13

Witness: RAFAEL FERNANDEZ, JR., M.D.		
Deposition taken on August 13, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		39:15-16
		43:7-13
		46:4-13
		47:12-20
		49:11-24
		50:1-12
		60:5-12
		61:1-5
		61:7-9
		61:11-25
		62:23-63:3
		63:11-65:1
		65:3-5
		66:9-11
		66:13-15
		67:14-68:1
		68:10-68:20
		69:1
		70:2-21
		71:15-18

Witness: RAFAEL FERNANDEZ, JR., M.D. Deposition taken on August 13, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
		71:24 ("Five to seven percent of my practice.")
		72:1-4
		76:24-77:9

4. **Bruce Kohrman, M.D.**

Witness: BRUCE KOHRMAN, M.D. Deposition taken on September 20, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
		7:12-20
		12:10-13:2
		14:4-15:15
		15:17
16:18-24		
		16:25-17:7
		18:15-21
		19:1-5
		19:7-8
		19:10-22:7

Witness: BRUCE KOHRMAN, M.D. Deposition taken on September 20, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		30:13-33:14
		34:11-35:22
		35:24-36:8
		36:12-21
		37:13-20
		38:15-39:5
		39:8-9
		39:20-40:8
		40:10-41:20
		43:2-9
		43:11-25
		44:2-45:12
		46:4-15
		46:24-48:3
		48:17-50:5
		50:7-51:21
		51:23-52:3
		52:5-9
		52:11-22
		53:16-54:20

5. Akshay Phatak²

Witness: AKSHAY PHATAK Deposition taken on July 20, 2023 (Volume 1)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
9:2-11		
12:23-13:1		
18:7-19:7		
		19:8-25
		19:8-25
		20:1-2
		20:8-18
21:24-22:8	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	
23:5-18	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	
23:22-25:4	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	

² To the extent all or some of Mr. Phatak's deposition testimony is allowed to be either read in by transcript or video, Tesla requests that the Court treat all designated testimony as "confidential" subject to the terms of the Confidentiality Protective Order [Doc. 126].

Witness: AKSHAY PHATAK		
Deposition taken on July 20, 2023 (Volume 1)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
25:7-13	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	
33:10-34:6	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	
34:10-17	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	
34:20-35:12		
35:16-17		
35:19-25		
36:4-5		
36:21-37:3		
37:10-18		
38:6-11		
38:14-16		
38:25-39:9		
39:18-40:23		Strike objection at 40:16-17
		43:5-16
		43:22-25

Witness: AKSHAY PHATAK		
Deposition taken on July 20, 2023 (Volume 1)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		44:1-25
		45:1-25
		46:1-25
		47:1-21, 25
		48:1-2
		48:21-25
		49:4-22
		50:1-25
		51:1-25
52:24-53:11		
53:14-23		
57:3-13		
58:20-23		
		60:19-25
61:3-7		61:1-2
62:24-63:7		
65:18-66:1		
66:8-13		
67:18-23		
68:5-16		

Witness: AKSHAY PHATAK		
Deposition taken on July 20, 2023 (Volume 1)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		68:25
		69:1-5
69:8-20		
69:24-70: 1		
70:11-15		
71:24-72:23		
73:2-9		
73:11-20		
74:6-12		
		76:12-25
		77:1-25
		78:20-25
		79:1-12
79:14-80:7		
80:17-20		
80:23-81 :4		
81:8-9		Strike objection at 81:5-9
82:22-25		
83:3-4		
83:13-21		

Witness: AKSHAY PHATAK		
Deposition taken on July 20, 2023 (Volume 1)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
84:10-14		
84:18-85:19		
85:24-25		
		86:8-25
		87:6-25
88:7-25		
92:1-10		
		92:11-25
		93:1-4
		93:12-25
		94:1-3
		94:12-25
101:3-8		101:9013
102:1-103:15		103:16-25
		104:1-3
105:21-106:3		
		106:4-12
106:13-107:15		
108:4-109:7		108:15-25

Witness: AKSHAY PHATAK		
Deposition taken on July 20, 2023 (Volume 1)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		110:1-17
110:18-112:5		
112:21-113:15		
113:20-114:15		
116:3-11		
		116:12-20
116:21-25		
120:3:121:16		Strike objection at 120:14-15
121:19-122:5		
122:9-14		
122:18-23		
123:7-13		
124:22-25		
126:9-14		
		127:13-25
		128:1-25
		129:25
		130:1-3
		130:7-17

Witness: AKSHAY PHATAK Deposition taken on July 20, 2023 (Volume 1)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
134:9-135:8	Subject to Tesla's Omnibus Motion <i>in Limine</i> [DE 320] re references to other incidents	
135:10-136:15		
136:21-139:23		
140:1-18		
140:21-143:17		
		143:8-20
		143:23-25
147:18-23		
147:25-148:11		
148:25-149:9		
149:13-19		
150:3-9		
150:13-16		
163:20-21		
163:24-165:13		

Witness: AKSHAY PHATAK		
Deposition taken on August 2, 2023 (Volume 2)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
278:6-11		
279:12-19		
279:24-280: 14		
		280:15-25
		281:1-23
281:24-282:2		
295:9-296:14	Hearsay FRE 802	
316:7-14		
317:1-14	Violation of Protective Order	
318:8-12		
318:19-320:3		
320:21-321:6		
321:9-15		
321:25-322:20		
344:6-15		
344:24-345:3		
351:13-14	Relevance FRE 401 and 403	
351:18-21	Relevance FRE 401 and 403	
352:20-353:2	Relevance FRE 401 and 403	
356:5-357:1		

Witness: AKSHAY PHATAK		
Deposition taken on August 2, 2023 (Volume 2)		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
358:4-11		
358:20-359:1		

6. **David Shoemaker³**

Witness: DAVID SHOEMAKER		
Deposition taken on January 9, 2025		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
8:22-25	Relevance FRE 401 and 403	
18:15-19:25	Relevance FRE 401 and 403	
21:22-24	Relevance FRE 401 and 403	
22:11-24	Relevance FRE 401 and 403	
23:2-24:3	Relevance FRE 401 and 403	
24:20-26:3	Relevance FRE 401 and 403	
26:21-23	Relevance FRE 401 and 403	
27:8-28:15	Relevance FRE 401 and 403	
28:17-29:6	Relevance FRE 401 and 403	
30:6-24	Relevance FRE 401 and 403	
31:3-7	Relevance FRE 401 and 403	

³ Tesla objects to the deposition of David Shoemaker in its entirety based on relevance. To the extent all or some of Mr. Shoemaker's deposition testimony is allowed to be either read in by transcript or video, Tesla requests that the Court treat the portions designated by Tesla as "confidential" subject to the terms of the Confidentiality Protective Order [Doc. 126].

Witness: DAVID SHOEMAKER		
Deposition taken on January 9, 2025		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
31:9-13	Relevance FRE 401 and 403	
32:2-33:9	Relevance FRE 401 and 403	
33:14-36:8	Relevance FRE 401 and 403	
36:14-22	Relevance FRE 401 and 403	
37:8-38:13	Relevance FRE 401 and 403	
39:13-40:8	Relevance FRE 401 and 403	
40:17-42:11	Relevance FRE 401 and 403	
44:11-18	Relevance FRE 401 and 403	
44:21-45:1	Relevance FRE 401 and 403	
46:9-48:8	Relevance FRE 401 and 403	
49:1-50:2	Relevance FRE 401 and 403	
52:4-53:13	Relevance FRE 401 and 403	
54:4-20	Relevance FRE 401 and 403	
54:23-24	Relevance FRE 401 and 403	
55:22-25	Relevance FRE 401 and 403	
57:6-17	Relevance FRE 401 and 403	
61 :8-20	Relevance FRE 401 and 403	
62:6-63:21	Relevance FRE 401 and 403	
64:23-65:14	Relevance FRE 401 and 403	
66:22-67:2	Relevance FRE 401 and 403	

Witness: DAVID SHOEMAKER Deposition taken on January 9, 2025		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
67:3-12	Relevance FRE 401 and 403	
71:17-72:24	Relevance FRE 401 and 403	
75:5-76:5	Relevance FRE 401 and 403	
77:18-78:14	Relevance FRE 401 and 403	
79:7-15	Relevance FRE 401 and 403	
88:18-22	Relevance FRE 401 and 403	
89:2-90:21	Relevance FRE 401 and 403	
		107:19 – 108:10

7. **Robert Sumwalt, III⁴**

Witness: ROBERT SUMWALT, III Deposition taken on July 9, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
11:15-21		
14:20-19:23		
21:1-24		
23:4-24:22		
33:20-34:22		

⁴ Tesla objects to any deposition testimony of Mr. Sumwalt being played or admitted at trial for the reasons stated in its Motion in Limine to Exclude his testimony. Tesla is counter designating testimony from his deposition to be played only if that Motion is denied.

Witness: ROBERT SUMWALT, III		
Deposition taken on July 9, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
36:1-4		
36:10-38:20		
39:5-40:23		
41:2-25		
42:4-6		
45:19-47:10		
47:20-53:7		
57:24-59:4		
59:7-15		
61:21-62:6		
63:2-7		
63:25-69:1		
73:4-14		
75:10-20		
75:23		
76:4-17		
76:19-23		
77:5-78:7		
78:17-80:13		
80:16-81:4		

Witness: ROBERT SUMWALT, III		
Deposition taken on July 9, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
85:6-13		
85:17-86:11		
86:16-87:17		
87:23-88:15		
		89:4
		89:12-14
		89:16-25
		90:1-9
		90:12-13
		92:16-25
		93:1-2
		96:3-25
		97:1-9
		99:2-8
		100:16-25
		101:1-11
		101:15-23
		102:3-7
		102:14-25
		103:1-9

Witness: ROBERT SUMWALT, III		
Deposition taken on July 9, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		105:23-25
		106:2-3
		106:5-10
		106:12-16
		106:21-25
		107:1-7
		108:5-11
		109:1-25
		110:1-2
		111:2-12
		111:20-25
		112:4-10
		112:19-25
		113:16-20
		118:12-16
		118:19-25
		119:1-3
		119:18-25
		120:1-7
		120:16-25

Witness: ROBERT SUMWALT, III		
Deposition taken on July 9, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		121:1-9
		127:11-15
		133:6-20
		135:7-19
		141:19-25
		142:1-18
		143:16-24
		148:12-25
		149:1-22
		150:11-18
		161:1-5
		161:9
		161:12-15
		161:17-24
		162:11-25
		163:1-25
		164:1-4
		164:18-21
		164:24-25
		165:1-25

Witness: ROBERT SUMWALT, III		
Deposition taken on July 9, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter- Designations PAGE(S):LINE(S)
		166:1-9
		169:11-25
		170:4-25
		171:18-25
		172:1-6
		172:8-9
		172:13-18
		172:22-24
		173:16-20
		173:25
		174:1-2
		176:4-8
		176:19-25
		177:1-2
		177:12-19
		177:23-25
		178:2-8
		178:17-19
		181:14-22
		218:12-16

Witness: ROBERT SUMWALT, III		
Deposition taken on July 9, 2024		
Plaintiffs' Designations PAGE(S):LINE(S)	OBJECTION	Tesla Counter-Designations PAGE(S):LINE(S)
		218:25
		219:1-3
		219:7
		219:9-12
		219:14
		219:16-25
		220:1-8
		220:20-25
		221:4-24
		222:16-25
		223:1-25
		224:1-10
		228:16-25
		229:1-14
		233:8-12
		233:20-22
		237:23-25
		238:1-21

Dated: June 27, 2025

Respectfully submitted,

s/ Whitney V. Cruz

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The undersigned hereby certifies that on June 27, 2025, the foregoing was filed using the Court's CM/ECF system, which will send electronic notice of the same to all interested parties.

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