

**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 MOTION FOR AN ORDER SETTING A PROCEDURE FOR  
REQUESTING CERTAIN LIMITATIONS ON PUBLIC ACCESS TO CONFIDENTIAL  
INFORMATION THAT IS LIKELY TO BE PRESENTED DURING TRIAL**

Based upon the Parties' lists of trial exhibits, deposition designations, information produced in discovery, and, more generally, the issues involved in this case, Tesla, Inc. ("Tesla") anticipates there is a very significant likelihood that portions of the trial—whether in live testimony, designated deposition testimony, and/or trial exhibits—will involve the disclosure of its valuable trade secrets. As such, Tesla respectfully moves the Court to enter an order establishing a procedure whereby it, prior to such disclosures, can move the Court for certain limited and appropriate restrictions on public access to such trade secret information.

## INTRODUCTION

Autonomous vehicle technology is in a period of extraordinary growth, with some estimates indicating a fivefold increase in global market value over the next five years.<sup>1</sup> Tesla is frequently acknowledged to be the global leader in this market due to its innovative, adaptive, and commercially successful approach to Advanced Driver Assistance Systems (ADAS) and autonomy.<sup>2</sup> In 2024, as actual and would-be competitors either lost a significant amount of money on each vehicle sale<sup>3</sup> or shuttered their autonomous vehicle development efforts altogether<sup>4 5</sup>, Tesla reported over \$72 billion in annual automotive sales revenue.<sup>6</sup>

Tesla's success has been hard-earned. Its position as the market leader is the result of years of innovative and ambitious research and development, diligent testing, and substantial capital reinvestment. Yet despite its present competitive advantage, Tesla recognizes that a significant and growing number of established and new automobile manufacturers have entered, or are reported to have plans to enter, the market for electric and other alternative fuel vehicles, as well as the market for self-driving technology and other vehicle applications and software platforms.<sup>7</sup>

Tesla further recognizes the substantial value of its intellectual property, the threat posed by intentional or inadvertent disclosure, and the damage that would result if its proprietary information was compromised: "Although we make reasonable efforts to maintain the confidentiality of our proprietary information, we cannot guarantee that these actions will deter or

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<sup>1</sup> <https://www.fortunebusinessinsights.com/autonomous-vehicle-market-109045>

<sup>2</sup> <https://finance.yahoo.com/news/nvidia-ceo-says-tesla-far-ahead-in-self-driving-tech-as-autonomous-driving-efforts-boost-chip-demand-181126677.html>

<sup>3</sup> <https://www.investors.com/news/rivian-stock-q3-earnings-2/>

<sup>4</sup> <https://www.reuters.com/business/autos-transportation/general-motors-drop-development-cruise-robotaxi-2024-12-10/>

<sup>5</sup> <https://www.cnbc.com/2024/02/27/apple-car-project-canceled-report.html>

<sup>6</sup> <https://www.sec.gov/Archives/edgar/data/1318605/000162828025003063/tsla-20241231.htm>

<sup>7</sup> Ibid.

prevent misappropriation of our intellectual property. The theft or unauthorized use or publication of our trade secrets and confidential information could affect our competitive position.”<sup>8</sup> In the face of this threat, Tesla has implemented robust information technology measures designed to protect against intellectual property theft, data breaches, sabotage and other external or internal cyber-attacks or misappropriation.<sup>9</sup>

The threat of compromise or disclosure of proprietary information related to its ongoing development efforts is not hypothetical: “While we have implemented security measures intended to prevent unauthorized access to our information technology networks, our products and their systems, malicious entities have reportedly attempted, and may attempt in the future, to gain unauthorized access to modify, alter and use such networks, products and systems to gain control of, or to change, our products’ functionality, user interface and performance characteristics or to gain access to data stored in or generated by our products.”<sup>10</sup>

In making this Motion, Tesla certainly recognizes the country’s long-standing tradition of an open court system and that the public has certain rights to information presented in open court. At the same time, however, the exhibits and trial testimony in this case will, in some instances, involve detailed discussion of Tesla trade secrets concerning how its Autopilot and other advanced driver assistance systems were developed and operate, the disclosure of which would irreparably harm Tesla due to their commercial sensitivity. Although this crash occurred in 2019, and the vehicle (and its software) were from 2018, the potential for competitors to seek to recreate Tesla’s roadmap remains real. Tesla just recently piloted its “Robotaxi” ride-sharing service, plus a Tesla vehicle drove itself off the manufacturing line and all the way to the purchaser’s doorstep, all

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<sup>8</sup> Ibid.

<sup>9</sup> <https://www.sec.gov/Archives/edgar/data/1318605/000162828025003063/tsla-20241231.htm>.

<sup>10</sup> Ibid.

autonomously. Even if others could be where Tesla was in 2019, it would get them closer to autonomy than they are today. And, some of the same software operating the vehicle in 2019 remains in Tesla's fleet today; this case and the anticipated documents and testimony are not dealing with some shelved or discontinued product.

In circumstances such as these, the Supreme Court and the 11th Circuit have recognized that trial courts can close the courtroom, seal the record, and/or provide other limitations on public access to trial proceedings, exhibits, and transcripts if doing so is the least restrictive means of achieving an overriding interest in protecting against the disclosure of valuable, commercially sensitive information. Rather than requesting any sort of wholesale restrictions at this time, Tesla instead requests only that the Court create a procedure whereby it can be heard and a record made of the Court balancing the need for public access against Tesla's stated proprietary interests in its trade secret, before testimony or exhibits that will contain trade secrets are offered in open court.

**I. LEGAL STANDARD FOR RESTRICTING ACCESS TO TRIAL INFORMATION AND RELATED PROCEDURAL CONCERNS**

In *Newman v. Graddick*, the 11th Circuit noted that, due to their similarities in certain respects to criminal trials, there is a presumption of openness to the public in civil trials that “pertain to the release or incarceration of prisoners and the conditions of their confinement,” but it refrained from determining whether this presumption of openness extends to all types of civil trials. *See Newman v. Graddick*, 696 F.2d 796, 801 (11th Cir. 1983). Despite this presumption of openness in at least some civil contexts, the *Newman* court explained:

We do not hold that every hearing, deposition, conference or even trial in a case of this kind must be open to the public. We do hold that where, as in the present case, the court attempts to deny access in order to inhibit the disclosure of sensitive information, it must be shown that the denial is necessitated by a compelling governmental interest, and is narrowly tailored to serve that interest.

*Id.* at 802 (quoting *Globe Newspaper Co. v. Superior Court*, 457 U.S. 596, 606, 102 S.Ct. 2613, 2620 (1982)). See also, *Chicago Tribune Co. v. Bridgestone/Firestone, Inc.*, 263 F.3d 1304 (11th Cir. 2001) (the court may protect a party from annoyance, oppression, etc., for good cause, pursuant to Fed. R. of Civ. P. 26(c)(1)). A few years later, the 11th Circuit again considered the question of confidentiality in civil trial proceedings, at which time it found that although there is a common law right of public access to civil proceedings, this right is not absolute. *Wilson v. American Motors Corp.*, 759 F.2d 1568, 1570 (11th Cir. 1985).<sup>11</sup> The *Wilson* court noted that the former Fifth Circuit<sup>[REDACTED]</sup> had rejected “the overpowering presumption of access” that prevailed in some other circuits and noted that, instead, “a number of factors may militate against public access” in this circuit. *Id.* at 1568 (citing *Belo Broadcasting Corp. v. Clark*, 654 F.2d 423 (5th Cir. 1981)). It then considered case law from other appellate circuits, including the Sixth, which it noted seemed to have created a very limited list of reasons that could justify “total closure of public records” that nevertheless included protection of trade secrets. *Id.* at 1570-71 (citing *Brown & Williamson Tobacco Corp. v. FTC*, 710 F.2d 423 (6th Cir. 1983)).

Ultimately, the *Wilson* court applied the above-quoted standard from *Newman*, though it was careful to note it was not formally adopting the Sixth Circuit’s short list of potential bases for limiting public access to court records. Though *Wilson* did not specifically concern trade secrets, its description of the Sixth Circuit’s list, along with its refusal to adopt that list as exclusive, leaves no doubt that the protection of trade secrets is a legitimate reason for courts in the 11th Circuit to

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<sup>11</sup> *Wilson* specifically concerned a post-trial effort by a third-party intervenor that sought trial records including pleadings, orders, affidavits, depositions, transcripts, court reporter’s notes, and trial exhibits. *Id.* at 1569. The underlying case had been tried in open court—there is no indication that courtroom closure or other restrictions had been sought—but had settled after the jury had responded to special interrogatories. *Id.* The trial record had been sealed as part of the settlement, which had been “reached with the ‘encouragement and assistance of the trial judge.’” *Id.*

consider restricted the baseline right of public access to court proceedings. This is confirmed by reference to the *Newman* standard itself, which notes that such consideration requires there be a balance of the competing interests of the parties where “the issue must be squarely confronted and those with various interests must be given the opportunity to be heard.” *Newman* at 696 F.2d 802.

The most direct evidence that there is a compelling governmental interest in protecting trade secrets is the fact that Congress has enacted the Defend Trade Secrets Act of 2016. *See* 18 U.S.C. § 1831, *et. seq.* The Defend Trade Secrets Act made it a crime to steal or receive trade secrets, created a civil right of action for owners of trade secrets to pursue relief for misappropriated trade secrets, and includes provisions requiring courts to “enter such orders and take such other action as may be necessary and appropriate to preserve the confidentiality of trade secrets[.]” *See* 18 U.S.C. §§ 1832, 1835, and 1836.

The need to close the courtroom in order to protect trade secrets has been recognized by federal courts across the country. *See e.g. In re the Iowa Freedom of Information Council*, 727 F.2d 658 (8th Cir. 1984) (denying petition for writ of mandamus regarding order closing courtroom to all non-parties during portion of trial where defendants’ trade secrets were to be the subject of testimony and also sealing those portions of the transcript); *Woven Electronics Corp. v. Advance Group, Inc.*, 930 F.2d 913 (table) (4th Cir. 1991) (holding that the courtroom should have been closed “during the times when trade secrets were to be exposed,” and requiring district court to seal parts of the record containing trade secrets); *Brown Prods. V. Home Box Office, Inc.*, 26 F.Supp.2d 606, 612 (S.D.N.Y. 1998) (“Potential damage from release of trade secrets is a legitimate basis for sealing documents and restricting public access during trial.”). The Defend Trade Secrets Act defines a “trade secret” as:

[A]ll forms and types of financial, business, scientific, technical, economic, or engineering information, including patterns, plans, compilations, program devices,

formulas, designs, prototypes, methods, techniques, processes, procedures, programs, or codes, whether tangible or intangible, and whether or how stored, compiled, or memorialized physically, electronically, graphically, photographically, or in writing if—

(A) the owner thereof has taken reasonable measures to keep such information secret; and

(B) the information derives independent economic value, actual or potential, from not being generally know to, and not being readily ascertainable through proper means by, another person who can obtain economic value from the disclosure or use of the information.

18 U.S.C. § 1839(3).

The Supreme Court has explained that (in criminal cases, where greater rights of public access to court proceedings have been identified), “The presumption of openness may be overcome only by an overriding interest based on findings that closure is essential to preserve higher values and is narrowly tailored to serve that interest. The interest is to be articulated along with findings specific enough that a reviewing court can determine whether the closure was properly entered.” *Waller v. Georgia*, 467 U.S. 39, 45, 104 S.Ct. 2210, 2215 (1984) (quoting *Press-Enterprise Co. v. Superior Court of CA, Riverside County*, 464 U.S. 501, 510 (1984)).

The Supreme Court further explained that “the party seeking to close the hearing must advance an overriding interest that is likely to be prejudiced, the closure must be no broader than necessary to protect that interest, the trial court must consider reasonable alternatives to closing the proceeding, and it must make findings adequate to support the closure.” *Id.* at 48, 104 S.Ct. at 2216. The 11th Circuit has refused to require a specific procedure for the consideration of whether to close proceedings or seal records, but it has explained “that the issue of closure must be squarely confronted and those with various interest must be given the opportunity to be heard.” *See U.S. v.*

*Valenti*, 987 F.2d 708, 715 (11th Cir. 1993) (quoting *Newman*, 696 F.2d at 802).<sup>12</sup> Accordingly, this Court must balance any asserted right of access against Tesla’s interest in keeping this information confidential.

**II. THERE IS A REASONABLE BASIS FOR CONCLUDING AT THIS TIME THAT TESLA MAY NEED TO SEEK LIMITED RESTRICTIONS ON PUBLIC ACCESS TO TRIAL PROCEEDINGS, TRANSCRIPTS, AND EXHIBITS**

In the course of preparing the L.R. 16.1 pretrial stipulation, which as of this writing has not been finalized, the parties identified a significant number of exhibits that may be offered at trial that contain information Tesla has identified as Confidential or Highly Confidential under the Confidentiality Protective Order that was entered in this case. *See* Exhibit A, Plaintiff’s Exhibit List; Exhibit B, Tesla’s Exhibit List<sup>13</sup>; *see also* (D.E. 126) Confidentiality Protective Order.<sup>14</sup> Similarly, portions of the deposition testimony of Tesla employees Akshay Phatak, Eloy Rubio-Blanco, and David Shoemaker (and Tesla’s counter-designations) discuss trade secret information that Tesla has identified as Confidential or Highly Confidential during discovery. Likewise, the depositions of other witnesses, and the analyses of experts retained by both parties’, contained

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<sup>12</sup> As discussed in more detail below, Tesla does not at this time request trial proceedings be closed to the public, or specific portions of testimony or trial exhibits be sealed. However, it presents this Motion now to inform the Court, and any potentially interested observers, that, during the trial, when it becomes clearer which exhibits will be offered and what information or material will be the subject of testimony, it may make specific, narrowly tailored requests for such protections. This is consistent with the guidance offered by the 11th Circuit regarding the necessity of providing notice that courtroom closure or other restrictions on access to trial information may be considered. *See Newman*, 696 F.2d at 802; *Valenti*, 987 F.2d at 715.

<sup>13</sup> Blue highlights have been applied to the items listed in Exhibits A and B that were marked as Confidential or Highly Confidential under the Confidentiality Protective Order.

<sup>14</sup> To the extent Plaintiffs oppose this Motion, Tesla notes that Plaintiffs agreed in the Stipulated Protective Order to “take reasonable steps to maintain the confidentiality of any Covered Information at any hearing or upon trial of this matter...” (Dkt. 126 at p. 13, ¶ 26). Plaintiffs should be joining this Motion, or at minimum supporting Tesla’s position, as it was in part their representation that they would protect Tesla’s trade secrets that encouraged Tesla to produce the material in this case.

detailed discussion of Tesla's trade secret information. More generally, of course, this case involves the design, development, and operation of Tesla's proprietary Autopilot and other advanced driver assistance systems.

Thus, it is clear that portions of this trial will almost certainly involve disclosure and discussion of Tesla's trade secrets. However, Tesla has identified objections to some of the exhibits and designated deposition testimony that, if granted, could obviate or limit the scope of trade secret-containing information that will be presented at trial.<sup>15</sup> Similarly, context-specific strategic considerations could cause the parties to choose not to call certain witnesses or offer certain exhibits. Understanding this, and in recognition of the careful consideration the Court must conduct before granting restrictions on public access to certain information, it would be premature—for Tesla to ask for any sort of wholesale set of restrictions on public access because of all of the testimony or exhibits that *might* be offered.<sup>16</sup> Conversely, a blanket order stating all testimony or exhibits the Court allows into trial will be part of the public record as well incentivizes Plaintiffs to introduce more than they might otherwise simply to eviscerate Tesla's protection over those materials and make them more available for other litigation.

Instead, Tesla asks the Court to enter in an order that will provide a procedure whereby it, and Plaintiff, can be heard before any session of trial that appears likely from context will involve the disclosure of its trade secrets. For instance, in one case involving a criminal prosecution

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<sup>15</sup> At this time, Tesla does not know what objections Plaintiff may make to the exhibits on its list, or its deposition counter-designations, but, of course, the same is true for those.

<sup>16</sup> Note also that the former Fifth Circuit, relying on Supreme Court precedent, has held that the public's right of access to trial exhibits and other material published in open court, or copies thereof, is more limited than is its right of access to attend a trial in real time. *See Belo Broadcasting Corp. v. Clark*, 654 F.2d 423, 427 (5th Cir. 1981). Thus, Tesla also recognizes the Court may need to consider differing levels of public access depending on what specific material is at issue.

regarding trade secrets, the court, after it had been given notice of the potential for trade secret revelation, permitted the party seeking protection to identify with specificity what was most likely to involve disclosure of trade secrets, and then gave the parties an opportunity to be heard on why the public should be restricted from access to that information. *See U.S. v. Aleynikov*, No. 10-CR-96, 2010 WL 5158125 (S.D.N.Y. 2010). That court then created a procedure whereby, before the courtroom would be closed to the public, it would be cleared outside the presence of the jury. *Id.* at \*1. That court, recognizing the need to present the trade secret-containing information in context, on occasion took more testimony in a closed courtroom “than was strictly necessary,” but the court resolved this concern by permitting the parties to submit proposals after the trial for the portions of the transcripts of the closed testimony that could be unsealed. *Id.*

Although Tesla is not asserting that precisely these procedures are the only ones that could be appropriate here, it offers this case as an example of the sorts of case-specific, narrowly-tailored restrictions that could achieve an appropriate balance between the compelling need to protect trade secrets and the baseline presumption of an open courtroom during trial. *See also Newman*, 696 F.2d at 802 (“We doubt that a universal standard for closure applicable in all cases can be developed and we do not intend to do so here.”).

### **III. CONCLUSION**

Tesla agrees the interest in an open court system that permits public access to trial proceedings is significant. At the same time, however, there can be no doubt that there is a well-understood and long-recognized competing interest in ensuring a party like Tesla is not irreparably harmed by the disclosure of its valuable trade secrets. Clearly there is a tension between these interests, but there is binding precedent that provides a standard for the balancing of these considerations that also permits this Court to establish procedures for conducting such balancing.

Short of that amounts to this Court's decision that Tesla's materials no longer warrant trade secret protection and Tesla's continued efforts to protect this information from the public are no longer necessary or are in vain.

Recognizing the challenge involved in this task, Tesla asks at this time that the Court enter an Order that establishes a procedure whereby, when the specific trade secrets that are most likely to be presented during trial can be more precisely identified, Tesla be permitted to present its need for certain limited restrictions with sufficient specificity to permit the Court to determine what narrowly-tailored protections, if any, are appropriate. The Court has indicated it intends to discuss the parties' trial exhibit and witness lists in the upcoming hearing on July 8. Tesla, therefore, requests the Court also consider this issue in detail during that hearing.

Date: July 7, 2025

Respectfully submitted,

s/ Whitney V. Cruz

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**CERTIFICATE OF SERVICE**

I hereby certify that on **July 7, 2025**, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

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\_\_\_\_\_  
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# **EXHIBIT A**

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
		<b>On-board camera footage/data</b>			
P-1.	Plaintiffs	On-board backup camera video - Tesla - 00000001			
P-2.	Plaintiffs	On-board fisheye camera video - Tesla - 00000002 (video)			
P-3.	Plaintiffs	On-board left pillar camera video - Tesla - 00000003 (video)			
P-4.	Plaintiffs	On-board left repeater camera video -Tesla - 00000004 (video)			
P-5.	Plaintiffs	On-board main camera video - Tesla - 00000005 (video)			
P-6.	Plaintiffs	On-board narrow camera video - Tesla - 00000006 (video)			
P-7.	Plaintiffs	On-board right pillar camera video -Tesla - 00000007 (video)			
P-8.	Plaintiffs	On-board right repeater camera video -Tesla - 00000008 (video)			
P-9.	Plaintiffs	D16 Report - Benavides-0000007-17			
		<b>Government Investigations</b>			
P-10.	Plaintiffs	Tesla letter to NHTSA May 2021 - Benavides-00000565-566	I, UP		
P-11.	Plaintiffs	Tesla Incident Review -Benavides-00000600-626	I, R, UP		
P-12.	Plaintiffs	ODI Resume Opening letter 8-13-21 - Benavides-00000727-728	I, R, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-13.	Plaintiffs	NHTSA letter to Tesla Aug 2021 - Benavides-00000828-838	I, R, H, UP		
P-14.	Plaintiffs	Theory of Operation HW2.5 Model S - Benavides-00003048-3118			
P-15.	Plaintiffs	Tesla Resp to NHTSA Oct 2021 - Benavides-00001016-1035	I, R, UP		
P-16.	Plaintiffs	Attachment 5b to Benavides 1016 – Resp to PE21020 - Benavides-00003119-3124	I, R, UP		
P-17.	Plaintiffs	Attachment 5c to Benavides 1016 – Resp to PE21020 - Benavides-00003125-3134	I, R, UP		
P-18.	Plaintiffs	Attachment 5d to Benavides 1016 – Resp to PE21020 - Benavides-00003135-3147	I, R, UP		
P-19.	Plaintiffs	Attachment 5e to Benavides 1016 – Resp to PE21020 - Benavides-00003148-3149	I, R, UP		
P-20.	Plaintiffs	Attachment 5f to Benavides 1016 – Resp to PE21020 - Benavides-00003150-3162	I, R, UP		
P-21.	Plaintiffs	Tesla Resp to 16007 from NHTSA 12-30-16 - Benavides-00003163-3185	I, R, UP		
P-22.	Plaintiffs	Tesla Qtrly Update to NHTSA 3-27-19 - Benavides-00003188-3222	I, R, UP		
P-23.	Plaintiffs	Tesla Qtrly Update to NHTSA 6-15-18 - Benavides-00003228-3260	I, R, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
		<b>Augmented Videos</b>			
P-24.	Plaintiffs	Tesla Augmented video main - Benavides-00007638	R, UP		
P-25.	Plaintiffs	Tesla Augmented video main (frame by frame) - Benavides-00007638 Tesla	R, UP		
P-26.	Plaintiffs	Tesla Augmented video narrow - Benavides-00007639	R, UP		
P-27.	Plaintiffs	Plaintiffs Augmented video main	R, UP		
P-28.	Plaintiffs	Plaintiffs Augmented video main (frame by frame)	R, UP		
P-29.	Plaintiffs	Plaintiffs Augmented video narrow	R, UP		
P-30.	Plaintiffs	Plaintiffs Augmented video narrow (frame by frame)	R, UP		
P-31.	Plaintiffs	Corporal Riso correspondence with Tesla - Benavides-00007681-7690	H		
		<b>Discovery Responses</b>			
P-32.	Plaintiffs	Tesla Responses to Benavides RFA, Set 1	R, UP		
P-33.	Plaintiffs	Tesla Supplemental Responses to Benavides RFA, Set 1	R, UP		
P-34.	Plaintiffs	Tesla Supplemental Responses to Huang RFA, Set 3	R, UP		
P-35.	Plaintiffs	Tesla Press Conference Autopilot v 7.0 software 10-14-2015 (Video)	H, R, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
		<b>Elon Musk's Statements About Autopilot</b>			
P-36.	Plaintiffs	Tesla Press Conference Autopilot v 7.0 software 10-14-2015 (Transcript in Word)	H, R, UP		
P-37.	Plaintiffs	Tesla Autopilot 2.0 Conference Call with Visuals 10-19-2016 (Video)	H, R, UP		
P-38.	Plaintiffs	Tesla Autopilot 2.0 Conference Call with Visuals 10-19-2016 (Transcript in Word)	H, R, UP		
P-39.	Plaintiffs	Tesla Conference 2016 – Q&A attachment 6 – 2016 Code (Video)	H, R, UP		
P-40.	Plaintiffs	Mobileye Statement 9-16-2016	H, R, UP		
P-41.	Plaintiffs	Tesla Press Conference 9-11-2016 (Audio)	H, R, UP		
P-42.	Plaintiffs	Tesla Press Conference 9-11-2016 (transcript)	H, R, UP		
		<b>Expert Reports</b>			
P-43.	Plaintiffs	Alan Moore Initial Report 6-23-2024	H, UP		
P-44.	Plaintiffs	Alan Moore Rebuttal Report 7-8-2024	H, UP		
P-45.	Plaintiffs	Alan Moore Supplemental Report 8-20-2024	H, UP		
P-46.	Plaintiffs	Alan Moore Declaration 12-2-2024	H, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-47.	Plaintiffs	Alan Moore Supplemental Declaration 12-10-2024	H, UP		
P-48.	Plaintiffs	Alan Moore 2 <sup>nd</sup> Supplemental Report 12-12-2024	H, UP		
P-49.	Plaintiffs	Alan Moore 2 <sup>nd</sup> Supplemental Declaration 1-15-2025	H, UP		
P-50.	Plaintiffs	Alan Moore photos (11 – jpg)			
P-51.	Plaintiffs	Alan Moore PPT <i>(per stip with Tesla, to be produced the day prior to his trial testimony)</i>	A		
P-52.	Plaintiffs	Tesla Owner's Manual - Benavides 00001795-1997			
P-53.	Plaintiffs	Owners Manual 2019 – Cadillac CT6	A		
P-54.	Plaintiffs	Clips of Lex Friedman Podcast #18, April 12, 2019 (with transcription)	H, R, UP		
P-55.	Plaintiffs	Mendel Singer Opinions 6-20-2024	H, UP		
P-56.	Plaintiffs	Dr. Mary (Missy) Cummings Initial Report 6-23-2024	H, UP		
P-57.	Plaintiffs	Dr. Mary (Missy) Cummings Updated Report 7-20-2024	H, UP		
P-58.	Plaintiffs	Dr. Mary (Missy) Cummings Supplemental Report Aug 2024	H, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-59.	Plaintiffs	Dr. Mary (Missy) Cummings Declaration 12-2-2024	H, R, UP		
P-60.	Plaintiffs	Dr. Mary (Missy) Cummings Declaration 2-24-2025	H, R, UP		
		<b>Government Investigation Findings</b>			
P-61.	Plaintiffs	ODI Closing Report – EA22002 PE21020 - 6-8-22	R, H, UP		
P-62.	Plaintiffs	Tesla letter to NHTSA – 11-1-21 – BENAVIDES-00001042-1053	R, UP		
P-63.	Plaintiffs	NHTSA - EA22002 Update 4-25-24	R, H, UP		
P-64.	Plaintiffs	NHTSA letter to Tesla – Eddie Gates 5-6-24	R, H, UP		
P-65.	Plaintiffs	NHTSA letter to Tesla – Jacky Lam 2-1-24	R, H, UP		
P-66.	Plaintiffs	NHTSA Recall - Part 573 – 23V838-8276 - 12-23-23	R, H, UP		
		<b>Reports and Data from Subject Collision</b>			
P-67.	Plaintiffs	Florida Highway Patrol Crash Report	P, H, UP		
P-68.	Plaintiffs	Florida Highway Patrol Traffic Homicide Report	P, H, UP		
P-69.	Plaintiffs	BENAVIDES-00000002 Log Data (Excel)	P, H, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-70.	Plaintiffs	BENAVIDES-00000003 Log Data (Excel)			
P-71.	Plaintiffs	BENAVIDES-00000006 Log Data (Excel)			
P-72.	Plaintiffs	BENAVIDES-00001111 response chart (Excel)			
		<b>Deposition Exhibits</b>			
P-73.	Plaintiffs	Autosteer - Exhibit 271 - TESLA-00085342-359	R, UP		
P-74.	Plaintiffs	Autopilot 1 - Exhibit 313 – TESLA-00056085-87 & TOC (3 pages)	R, UP		
P-75.	Plaintiffs	Paint it Black video	R, UP		
P-76.	Plaintiffs	Reserved			
P-77.	Plaintiffs	NTSB Report - Collision between a Car Operated with Automated Vehicle Control Systems and a Tractor-Semitrailer Truck Near Williston Florida - Exh 3 to deposition of Robert Sumwalt III	R, H, UP		
P-78.	Plaintiffs	NTSB New Safety Recommendations 9-28-17 - Exh 4 to deposition of Robert Sumwalt III	R, H, UP		
P-79.	Plaintiffs	NTSB Safety Recommendation H-17-041 - Exh 5 to deposition of Robert Sumwalt III	R, H, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-80.	Plaintiffs	Text message from Robert Sumwalt to Elon Musk 2-25-20 - Exh 6 to deposition of Robert Sumwalt III	R, H, UP		
P-81.	Plaintiffs	Safety Recommendation H-17-042 - Exh 7 to deposition of Robert Sumwalt III	R, H, UP		
P-82.	Plaintiffs	Robert Sumwalt presentation to U.S. Senate 11-20-19 - Exh 9 to deposition of Robert Sumwalt III	R, H, UP		
P-83.	Plaintiffs	Reserved			
P-84.	Plaintiffs	Reserved			
P-85.	Plaintiffs	H-17-042 - Exh 221 to deposition of Ashkay Phatak	R, H, UP		
P-86.	Plaintiffs	H-17-041 - Exh 233 to deposition of Ashkay Phatak	R, H, UP		
P-87.	Plaintiffs	NTSB letter 9-28-17 - Exh 252 to deposition of Ashkay Phatak	R, H, UP		
P-88.	Plaintiffs	Tesla Considered Adding Eye Tracking - Exh 310 to deposition of Askay Phatak	R, H, UP		
P-89.	Plaintiffs	Hands-on email string – ((Exh 316 to deposition of Ashkay Phatak – TESLA-0010688n2)			
P-90.	Plaintiffs	Autopilot chimes volume email string – (Exh 319 to deposition of Ashkay Phatak – TESLA-00077924)	A, H, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-91.	Plaintiffs	Driver monitoring email string - Exh 321 to deposition of Ashkay Phatak – TESLA-00106107			
P-92.	Plaintiffs	Reserved			
P-93.	Plaintiffs	Declaration of David Shoemaker - Exhibit 2 to Deposition of David Shoemaker			
P-94.	Plaintiffs	Reserved			
P-95.	Plaintiffs	Autosteer Beta Warning (page 7) – Exh 2 to Deposition of Eloy Rubio Blanco			
P-96.	Plaintiffs	Driver Assistance System – Model S – HW2.5 - Exh 3 to Deposition of Eloy Rubio Blanco			
P-97.	Plaintiffs	Longitudinal Collision Management - Exh 5 to Deposition of Eloy Rubio Blanco			
P-98.	Plaintiffs	Garage Pages of McGee Tesla-- BENAVIDES-00007640-7660			
P-99.	Plaintiffs	Reserved – (Deposition excerpts played at trial of Robert Sumwalt III)	I, R, UP		
P-100.	Plaintiffs	Reserved – (Deposition excerpts played at trial of Eloy Rubio Blanco)			
P-101.	Plaintiffs	Reserved – (Deposition excerpts played at trial of David Shoemaker)	R, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-102.	Plaintiffs	Reserved – (Deposition excerpts of Ashkay Phatak played at trial)			
P-103.	Plaintiffs	Mendel Singer Powerpoint <i>(per stip with Tesla, to be produced the day prior to his trial testimony)</i>	A		
		<b>Liability Demonstratives</b>			
P-104.	Plaintiffs	Demonstratives – Subject Tesla's Media Control Unit	Reserve right to object		
P-105.	Plaintiffs	Demonstratives – Subject Tesla's Electronic Control Unit	Reserve right to object		
P-106.	Plaintiffs	Demonstrative – Tesla Timeline	Reserve right to object		
P-107.	Plaintiffs	Demonstrative – Crash Timeline	Reserve right to object		
P-108.	Plaintiffs	Demonstrative – Road Class	Reserve right to object		
P-109.	Plaintiffs	Demonstrative – Urgent Upload	Reserve right to object		
P-110.	Plaintiffs	Demonstrative – Data Storage	Reserve right to object		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-111.	Plaintiffs	Demonstrative - Elon Musk's Statements	A, R, H		
P-112.	Plaintiffs	Demonstrative	Reserve right to object		
P-113.	Plaintiffs	Demonstrative	Reserve right to object		
P-114.	Plaintiffs	Demonstrative	Reserve right to object		
P-115.	Plaintiffs	Demonstrative	Reserve right to object		
P-116.	Plaintiffs	Demonstrative	Reserve right to object		
P-117.	Plaintiffs	Demonstrative	Reserve right to object		
P-118.	Plaintiffs	Demonstrative	Reserve right to object		
P-119.	Plaintiffs	Demonstrative	Reserve right to object		
		<b>Damages – medical records, photographs, demonstratives</b>			

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-120.	Plaintiffs	Miami Dade Fire Rescue Records (A000003-A000006)	H, R, UP		
P-121.	Plaintiffs	Ocean Reef Volunteer Fire Department Records (Angulo006925—6936)	H, R, UP		
P-122.	Plaintiffs	Jackson Memorial Hospital Records (4/25/19   Angulo000460—005446)	H, R, UP		
P-123.	Plaintiffs	Jackson Memorial Hospital Records (6/11/19  Angulo005447—005492)	H, R, UP		
P-124.	Plaintiffs	Jackson Memorial Hospital Records (6/13/19   Angulo005493—005561)	H, R, UP		
P-125.	Plaintiffs	Jackson Memorial Hospital Records (12/16/19   Angulo005562—006889)	H, R, UP		
P-126.	Plaintiffs	Baptist Health South Florida Records (Angulo 000230—459)	H, R, UP		
P-127.	Plaintiffs	Baptist Health South Florida Records (C000006—26)	H, R, UP		
P-128.	Plaintiffs	UMH Records Giselle Marie Hernandez, MD (Angulo007556—7562; 7540—7544; 7524—7530; 7508—7514; 7484—7489; 7458—7465; 7430—7435; 7420—7426) and summaries from 4/13/22; 2/28/24; 9/18/24; 11/13/24	H, R, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-129.	Plaintiffs	UMH Records Gregory Zych, DO (Angulo007443—7448)	H, R, UP		
P-130.	Plaintiffs	UMH Records Arshad Kaleem, MD (Angulo007552—7555)	H, R, UP		
P-131.	Plaintiffs	UMH Records Chane Nami Price, MD (Angulo007837—7845; 7846— 7853; 7879—7885)	H, R, UP		
P-132.	Plaintiffs	UMH Records Danielle Bodzin Horn, MD (2/28/24; 10/9/2024; 12/18/24; 2/14/25; 4/9/25)	H, R, UP		
P-133.	Plaintiffs	UMH Records Joseph Patin, MD (6/26/24; 6/25/25)	H, R, UP		
P-134.	Plaintiffs	UMH Records Michael Gerald Baraga, MD (Angulo007498—7507)	H, R, UP		
P-135.	Plaintiffs	UMH Records Richard C. Davi, MD (3/21/23; 5/23/23; 3/26/24; 6/26/24)	H, R, UP		
P-136.	Plaintiffs	UMH Records Ortho Trauma (Angulo006950—7002)	H, R, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-137.	Plaintiffs	UMH Records Lennar Foundation Rehab (Angulo007861—7871; 7273—7293; 7304—7337; 7252—7263; 7234—7243; 7216—7226; 7190—7206; 7148—7158; 7941—7948; 7076—7087; 7056—7068; D000001—302)	H, R, UP		
P-138.	Plaintiffs	Elite Physical Therapy Records (4/24/23—6/2/25; Angulo008012—8241)	H, R, UP		
P-139.	Plaintiffs	Evolutionary Healing Institute Records (5/17/23; 5/24/23; 6/5/23)	H, R, UP		
P-140.	Plaintiffs	Mind & Soul Therapy Records (Angulo006293—6294)	H, R, UP		
P-141.	Plaintiffs	Plasencia & Associates Records (8/23/23—1/20/25)	H, R, UP		
P-142.	Plaintiffs	Wellspring Counseling Records (4/4/24—7/22/24)	H, R, UP		
P-143.	Plaintiffs	Pathway Counseling Records (A000001—16)	H, R, UP		
P-144.	Plaintiffs	Pathway Counseling Records (1/2/25—5/21/25)	H, R, UP		
P-145.	Plaintiffs	William Torres Carbonell, PMHNP Records (8/13/24—11/11/24)	H, R, UP		
P-146.	Plaintiffs	Design Neuroscience Center Records (6/29/23—6/27/24)	H, R, UP		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-147.	Plaintiffs	Comprehensive Rehabilitation Evaluation by Craig H. Lichtblau, MD	H, R, UP		
P-148.	Plaintiffs	Neuropsychological Evaluation by Sally L. Kolitz Russell, MD	H, R, UP		
P-149.	Plaintiffs	UMHealth Imaging Studies (10/3/19; 9/29/19; 7/18/19; 5/23/19; 11/21/19; 4/13/22; 4/23/20; 9/27/19; 10/4/24; 4/26/19; 4/30/19; 4/25/19; 5/6/19; 5/4/19; 4/29/19; 5/21/19; 4/27/19)	H, R, UP		
P-150.	Plaintiffs	Demonstrative Summary of Plaintiff Angulo's Injuries, Surgeries, and Neuropsychological Findings	Reserve right to object		
P-151.	Plaintiffs	Photographs—damage to Plaintiff Angulo's vehicle	Reserve right to object		
P-152.	Plaintiffs	Photographs—Angulo and Naibel Benavides prior to the incident	Reserve right to object		
P-153.	Plaintiffs	Photographs—Angulo's physical injuries	Reserve right to object		
P-154.	Plaintiffs	Photographs and Videos—Naibel Benavides' moments with family prior to the incident	Reserve right to object		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-155.	Plaintiffs	Photographs—Plaintiff Angulo's jaw hardware and pelvic fractures	Reserve right to object		
P-156.	Plaintiffs	Miami Neck & Back Records (F000003-5)	H, R, UP		
P-157.	Plaintiffs	Demonstrative	Reserve right to object		
P-158.	Plaintiffs	Demonstrative	Reserve right to object		
P-159.	Plaintiffs	Demonstrative	Reserve right to object		
P-160.	Plaintiffs	Demonstrative	Reserve right to object		
P-161.	Plaintiffs	Demonstrative	Reserve right to object		
P-162.	Plaintiffs	Demonstrative	Reserve right to object		
P-163.	Plaintiffs	Demonstrative	Reserve right to object		
P-164.	Plaintiffs	Demonstrative	Reserve right to object		

**PLAINTIFFS TRIAL EXHIBIT INDEX****CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-165.	Plaintiffs	Demonstrative	Reserve right to object		
P-166.	Plaintiffs				
P-167.	Plaintiffs				
P-168.	Plaintiffs				
P-169.	Plaintiffs				
P-170.	Plaintiffs				
P-171.	Plaintiffs				
P-172.	Plaintiffs				
P-173.	Plaintiffs				
P-174.	Plaintiffs				
P-175.	Plaintiffs				
P-176.	Plaintiffs				
P-177.	Plaintiffs				
P-178.	Plaintiffs				
P-179.	Plaintiffs				

**PLAINTIFFS TRIAL EXHIBIT INDEX**

**CASE NAME:** NEIMA BENAVIDES & DILLON ANGULO vs. TESLA

**CASE NUMBER:** 21-cv-21940-BLOOM/Torres

Exhibit No.	Submitted By	Description	Legal Grounds for Objection	(Clerk's Entries)	
				Date Identified	Date Admitted
P-180.	Plaintiffs				

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

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

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

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 LIST OF TRIAL EXHIBITS**

Pursuant to FRCP 26 (a)(3), Local Rule 16.1(e), and this Court’s Order Scheduling Trial and Order of Instructions Before Calendar Call (Doc. 410), Defendant Tesla, Inc. hereby files its List of Trial Exhibits:

<b>PRESIDING JUDGE:</b> Hon. Beth Bloom	<b>PLAINTIFFS’ ATTORNEYS:</b> Adam T. Boumel Brett J. Schreiber Todd Poses Douglas F. Eaton	<b>DEFENDANT’S ATTORNEYS:</b> Thomas Branigan Joel Smith Whitney Cruz Kevin Malloy Hilarie Bass
<b>TRIAL DATE:</b> July 14, 2025	<b>COURT REPORTER</b> Yvette Hernandez	<b>COURTROOM DEPUTY</b> Elizabeth Gariazzo

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
<i>Accident and Vehicle Info</i>				
D-1	WITHDRAWN - DUPLICATE			
D-2	WITHDRAWN – DUPLICATE			

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-3	WITHDRAWN - DUPLICATE			
D-4	WITHDRAWN - DUPLICATE			
D-5	WITHDRAWN - DUPLICATE			
D-6	WITHDRAWN - DUPLICATE			
D-7	WITHDRAWN - DUPLICATE			
D-8	WITHDRAWN - DUPLICATE			
D-9	Monroe County Sheriff's Office Offense Report and Call History Record (10 pages)	I, H		
D-10	Florida Highway Patrol daytime photographs (209)	R, UP		
D-11	Florida Highway Patrol evidence photographs (68)	R, UP		
D-12	Florida Highway Patrol on scene photographs (102)	R, UP		
D-13	Florida Highway Patrol – Officer Carlos Rosario-Flores scene photographs (128)	R, UP		
D-14	Florida Highway Patrol photographs of the Tesla Model S (86)	R, UP		
D-15	Florida Highway Patrol photographs of the Chevrolet Tahoe (107)	R, UP		
D-16	FHP Officer Joel Torres body worn camera excerpt - video	R, UP, P		
D-17	FHP Officer Joel Torres body worn camera excerpt - transcript	R, UP, P		
D-18	George McGee 911 audio call	R, UP, P		
D-19	George McGee 911 – transcript	R, UP, P		
D-20	Video clips (8) from exterior cameras of the subject Tesla Model S [TESLA_00000001-00000008]	R to some clips; No Obj. to main and narrow views		
D-21	Customer Friendly Version of Diagnostic Log Data for subject vehicle on April 25, 2019 at 7:33:19 through 09:13:20 PM (EST) [CONF BENAVIDES_00000001; Blanco Dep. Ex. 8]	R to some log data; No Obj. to relevant log data from time of incident.		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-22	Excel Spreadsheet: Diagnostic Log Data for subject vehicle on April 24, 2019 at 3:00:11 through April 25, 2019 at 2:53:27 (EST) [BENAVIDES_00000002]	R to some log data; No Obj. to relevant log data from time of incident.		
D-23	Customer Friendly Version of Diagnostic Log Data for subject vehicle on April 25, 2019 at 03:02:07.000 AM through 3:22:05.500 PM (EST) [BENAVIDES_00000003]	R to some log data; No Obj. to relevant log data from time of incident.		
D-24	Engineering Set of Diagnostic Log Data for subject vehicle starting at line 66360 on April 24, 2019 at 08:00:00.000 through 02:59:56.000 AM April 25 (EST) [BENAVIDES_00000004]	R to some log data; No Obj. to relevant log data from time of incident.		
D-25	Engineering set of Diagnostic Log Data for subject vehicle on April 25, 2019 at 03:00:06.02 AM through 3:22:40.500 PM (EST) [BENAVIDES_00000005]	R to some log data; No Obj. to relevant log data from time of incident.		
D-26	Customer Friendly set of Diagnostic Log Data for subject vehicle on April 25, 2019 at 09:13:15.437 through 09:13:20:321 PM (EST) [CONF BENAVIDES_00000006; DE 325-2]	R to some log data; No Obj. to relevant log data from time of incident.		
D-27	Preliminary Evaluation (PE) 21-020 – Response to Request for Information [BENAVIDES_00001016-00001035]	No obj. so long as attachments included. See P16-P22		
D-28	Engineering set of DLD for Subject Vehicle- April 26 between 8:00 - 9:13.20.321 PM (EST) [BENAVIDES_00001643]	R to some log data; No Obj. to relevant log data from time of incident.		
D-29	Tesla EDR Report for subject Tesla Model S [BENAVIDES_00001644-00001661; DE 380-17]	R, H		
D-30	Owners Rights Notification [BENAVIDES_00001662-00001706]	R		
D-31	Tesla Motor Vehicle Order Agreement for subject Model S [BENAVIDES_00001707-00001711]	No Obj. to _1707; R to balance		
D-32	Dealer Information for subject Model S [BENAVIDES_00001713]	R, H		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-33	Florida Application for Certificate of Title With/Without Registration – George McGee – Tesla Model S [BENAVIDES_00001714-00001718]	R, H		
D-34	Tesla Delivery Declaration – George McGee [BENAVIDES_00001719]	No Obj.		
D-35	Tesla Purchase Checklist dated January 31, 2019 – George McGee [BENAVIDES_00001726-00001742]	R, H		
D-36	Tesla Model S window sticker [BENAVIDES_00001768; DE 325-6]	No Obj		
D-37	Tesla Certificate of Origin for a Vehicle dated January 23, 2019 with Retail Installment Sales Contract [BENAVIDES_00001769-00001790]	No Obj		
D-38	Tesla Motor Vehicle Purchase Agreement, Vehicle Configuration - Customer Sales Package [BENAVIDES_00001791]	R, Dup of D-31		
D-39	Tesla Motors Sales Invoice dated January 30, 2019 [BENAVIDES_00001793-00001794]	R, See D-31		
D-40	Tesla Model S Owner’s Manual, December 17, 2018 [BENAVIDES_00001795-00001997]	No Obj. to select pages; R to balance		
D-41	Tesla Model S New Vehicle Limited Warranty, December 1, 2018 [BENAVIDES_00001998-00002013]	R, H		
D-42	Engineering Set for Subject Vehicle between April 24, 2019 at 08:00:08.000 through April 25 at 02:53:27.136 AM (EST) [BENAVIDES_00002087]	R to some log data; No Obj. to relevant log data from time of incident.		
D-43	Customer Friendly Diagnostic Log Data for Subject Vehicle on April 25, 2019 at 23:23:15.014 through 23:59:59.000 [BENAVIDES_00002088]	R to some log data; No Obj. to relevant log data from time of incident.		
D-44	Customer Friendly Diagnostic Log Data for the Subject Vehicle starting on April 25, 2019 at 03:02:07.000 AM through 03:22:05.500 PM (EST) [BENAVIDES_00002089]	R to some log data; No Obj. to relevant log data from time of incident.		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-45	Customer Friendly version of Diagnostic Log Data on April 25, 2019 at 08:00:00.000 through 09:13:20.000 PM (EST) [BENAVIDES_00002090]	R to some log data; No Obj. to relevant log data from time of incident.		
D-46	Garage Report [CONF BENAVIDES_00002093-00002094; Blanco Dep. Ex. 4]	UP – see P-98 - No Obj for a more complete set		
D-47	Longitudinal Collision Management [CONF BENAVIDES_00002094-00002107; Blanco Dep. Ex. 5]	No Obj		
D-48	AEB Testing – Autopilot – Confluence dated May 14, 2015 [HIGHLY CONF BENAVIDES 00002108-00002110; Blanco Dep. Ex. 6]	H		
D-49	Automatic Emergency Braking (“AEB”) and Forward Collision Warning (“FCW”) – Autopilot – Confluence [HIGHLY CONFIDENTIAL BENAVIDES_00002111-00002121; Blanco Dep. Ex. 7]	H		
D-50	Driver Assistance System – Model S – HW2.5 [CONF BENAVIDES_00003048-00003118; Blanco Dep. Ex. 3]	No Obj to most if not all		
D-51	Tesla Quarterly Updated dated March 27, 2019 [CONF BENAVIDES-00003188-00003222]	No Obj – P 22		
D-52	Tesla Quarterly Update dated June 15, 2018 [CONF BENAVIDES_00003228-00003260]	No Obj – P23		
D-53	Driver Log Data 3:30-8:40 p.m. from MCU Chip [CONF BENAVIDES-00003264-00003349]	H, R		
D-54	DSAR aka Customer Friendly Log Data and Log Signals [CONF BENAVIDES-00003350-00003446]	H, R		
D-55	SD Card Alerts [CONF BENAVIDES-00003447-00007495]	H, R		
D-56	Snapshot Data [CONF BENAVIDES-00007496-00007637]	H, R		
D-57	Snapshot Data – video [CONF BENAVIDES-00007638]	No Obj		
D-58	Vision Signals Data [CONF BENAVIDES-00007691]	H, R		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-59	Autosteer (Beta) notification [DE 318-11; Cummings Dep. Ex. 10]	No Obj if Tesla agrees to admission of P-95		
D-60	All Tesla Vehicle Safety Reports and related data.	Rule 26		
<b><i>MSJ/MIL Exhibits</i></b>				
D-61	NHTSA DOT HS 813403; “The Economic and Societal Impact of Motor Vehicle Crashes, 2019 (Revised), dated February 2023” [DE 380-2-8]	R, H, I		
D-62	NHTSA DOT HS 812984; “Risk-Based Processes for Safety Defect Analysis and Management of Recalls.” [DE 380-11]	R, H, I		
D-63	NHTSA DOT HS 812653, “Target Crash Population for Crash Avoidance Technologies in Passenger Vehicles,” March 2019. [DE 380-18]	R, H, I		
D-64	Article, “Identifying the main factors contributing to driving errors and traffic violations – Results from naturalistic driving data” [DE 380-9]	R, H, I		
D-65	DefensesCoop article, “Pentagon may take a page out of Tesla’s playbook and run AI in ‘shadow mode’”. [DE 380-15]	R, H, I		
D-66	Excerpts from “Human Factors Design Guidance for Level 2 and Level 3 Automated Driving Concepts.” [DE 380-16]	R, H, I		
D-67	SAE J3016 Surface Vehicle Recommended Practice, April 2021 [DE 359-7]	R, H, I		
D-68	NHTSA Automated Driving Systems 2.0 – A Vision for Safety [DE 359-8]	R, H, I		
D-69	NHTSA Automated Vehicles for Safety – The Evolution of Automated Safety Technologies [DE 359-10]	R, H, I		
D-70	NHTSA Federal Automated Vehicles Policy – Accelerating the Next Revolution in Roadway Safety, September 2016 [DE 359-12]	R, H, I		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-71	SAE J3016 Levels of Driving Automation - Refined for Clarity and International Audience, May 3, 2021 [DE 359-13]	R, H, I		
D-72	ADAS Levels of Automation tag [DE 359-14]	R, H, I		
D-73	SAE International – Standards Development. The Creation of Standards at SAE [DE 359-15]	R, H, I		
D-74	Cadillac Super Cruise Convenience & Personalization Guide 2023. [DE 380-12]	R, H, I		
D-75	Ford Mustang Mach-E Owner’s Manual 2023. [DE 380-13]	R, H, I		
D-76	Declaration of Christopher B. Payne dated April 9, 2025	H, I, UP, Rule 26		
D-77	Complaint in <i>Benavides, et al. v. George Brian McGee</i> [DE 325-9]	R, H, I		
D-78	Complaint in <i>Dillon Angulo v. George Bryan McGee</i> [DE 325-10]	R, H, I		
<b>Deposition Exhibits</b>				
D-79	Zillow ad for 274 Seaview Drive (Angulo home) [Angulo Dep. Ex C]	R, H, UP		
D-80	Garage Report dated December 18, 2018 [CONF BENAVIDES_00007640-00007668; Calafell Dep. Ex. 3]	No Obj. to P-98 which is a chronological version of this exhibit		
D-81	Declaration of David Shoemaker dated December 27, 2024 [Shoemaker Dep. Ex. 2]	No Obj		
D-82	Still shot of video of T-intersection at Card Sound Road [Shoemaker Dep. Ex. 3]	No Obj		
D-83	Tesla Autosteer Instructions [Cummings Dep. Ex. 7]	No Obj		
D-84	Excerpt from report, “The Economic and Societal Impact of Motor Vehicle Crashes” [Cummings Dep. Ex. 11]	R, H, I		
D-85	Accident scene photo of T-intersection at Card Sound Road and CR-905 [McGee Dep. Ex. 5]	No Obj		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-86	Accident scene photo of T-intersection at Card Sound Road and CR-905 [McGee Dep. Ex. 6]	No Obj		
D-87	Tesla 7.1 Autosteer Hands-On Alert Timing excerpt [HIGHLY CONF BENAVIDES_00108954-00108955; Phatak Dep. Ex. 320]	No Obj		
D-88	Accident scene photo of T-intersection at Card Sound Road and CR-905 [Riso Dep. Ex. 6]	No Obj		
D-89	Accident scene photo of T-intersection at Card Sound Road and CR-905 [Riso Dep. Ex. 7]	No Obj		
D-90	Elapsed Driving Distance & Driver Inputs graph [Walker Dep. Ex. 3]	H, UP		
D-91	Elapsed Driving Distance (Last 16 miles) & Driver Inputs [Walker Dep. Ex. 3]	H, UP		
D-92	Elapsed Driving Distance and Brake Channels [Walker Dep. Ex. 3]	H, UP		
D-93	Elapsed Driving Distance & Alerts [Walker Dep. Ex. 3]	H, UP		
D-94	Elapsed Driving Distance (Last 16 miles) & Alerts [Walker Dep. Ex. 3]	H, UP		
D-95	Elapsed Driving Distance & Hand Detection [Walker Dep. Ex. 3]	H, UP		
D-96	Elapsed Driving Distance (Last 16 miles) & Hand Detection [Walker Dep. Ex. 3]	H, UP		
D-97	Elapsed Driving Distance & ADAS States [Walker Dep. Ex. 3]	H, UP		
D-98	Elapsed Driving Distance (Last 16 miles) & ADAS States [Walker Dep. Ex. 3]	H, UP		
D-99	Elapsed Driving Distance (Last 4 miles) & ADAS States [Walker Dep. Ex. 3]	H, UP		
D-100	Elapsed Driving Distance & Lead Vehicle Distance [Walker Dep. Ex. 3]	H, UP		
D-101	Elapsed Driving Distance (Last 16 miles) & Lead Vehicle Distance [Walker Dep. Ex. 3]	H, UP		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-102	Elapsed Driving Distance (Last 2 miles) & Lead Vehicle Distance [Walker Dep. Ex. 3]	H, UP		
<b><i>Discovery Responses</i></b>				
D-103	Dillon Angulo's Initial Disclosures dated October 4, 2022	R, H, I		
D-104	Dillon Angulo's Response to Tesla's First Request for Admissions dated March 10, 2024	H, UP, I		
D-105	Dillon Angulo's Answers to Tesla's Interrogatories, Set One, dated March 27, 2023	H, UP, I		
D-106	Dillon Angulo's Second Supplemental Answers to Tesla's Interrogatories, Set One, dated March 29, 2024	H, UP, I		
D-107	Dillon Angulo's Third Supplemental Answers to Tesla's Interrogatories, Set One, dated June 14, 2024	H, UP, I		
D-108	Dillon Angulo's Fourth Supplemental Answers to Tesla's Interrogatories, Set One, dated November 8, 2024	H, UP, I		
D-109	Dillon Angulo Response to Tesla's Request for Production, Set One, dated March 27, 2023	H, UP, I		
D-110	Dillon Angulo Second Supplemental Response to Tesla's Request for Production, Set One, dated September 13, 2023	H, UP, I		
D-111	Dillon Angulo Response to Tesla's Request for Production, Set Two, dated March 10, 2024	H, UP, I		
D-112	Plaintiff Benavides' Initial Disclosures dated July 1, 2021	H,UP, I		
D-113	Plaintiff Benavides' Response to Tesla's First Request for Admission dated August 23, 2022	H, UP, I		
D-114	Plaintiff Benavides' Response to Tesla's First Request for Admission dated December 9, 2022	H, UP, I		
D-115	Plaintiff Benavides' Amended Response to Tesla's First Request for Admission dated January 6, 2023	H, UP, I		
D-116	Plaintiff Benavides' Response to Tesla's Second Request for Admission dated May 11, 2023	H, UP, I		
D-117	Plaintiff Benavides' Responses to Tesla's Third Request for Admission dated March 10, 2024	H, UP, I		
D-118	Plaintiff's Benavides Answers to Tesla's Interrogatories, Set One, dated December 20, 2021	H, UP, I		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-119	Plaintiff Benavides' Response to Tesla's Request for Production dated February 11, 2022	H, UP, I		
D-120	Plaintiff Benavides' Amended Response to Tesla's Request for Production dated April 25, 2022	H, UP, I		
D-121	Plaintiff Benavides' Response to Tesla's Second Request for Production dated August 23, 2022	H, UP, I		
D-122	Plaintiff Benavides' Amended and Supplemental Response to Tesla's Request for Production dated December 12, 2022	H, UP, I		
D-123	Plaintiff Benavides' Response to Tesla's Second Request for Production dated December 12, 2022	H, UP, I		
D-124	Plaintiff Benavides' Response to Tesla's Third Request for Production dated December 12, 2022	H, UP, I		
D-125	Plaintiff Benavides' Amended Response to Tesla's Third Request for Production dated January 12, 2023	H, UP, I		
D-126	Plaintiff Benavides' Response to Tesla's Fourth Request for Production dated May 15, 2023	H, UP, I		
D-127	Plaintiff Benavides' Response to Tesla's Fifth Request for Production dated March 10, 2024	H, UP, I		
D-128	Tesla's Initial Disclosures dated June 30, 2021	H, UP, I		
D-129	Tesla's First Supplemental Initial Disclosures dated June 6, 2024	H, UP, I		
D-130	Tesla's Response to Plaintiffs' First Request for Admission dated January 15, 2024	H, UP, I		
D-131	Tesla's Supplemental Response to Plaintiffs' First Request for Admission dated May 24, 2024	H, UP, I		
D-132	Tesla's Response to Plaintiff Angulo's First Interrogatories dated February 16, 2024	H, UP, I		
D-133	Tesla's Response to Plaintiff Angulo's Second Interrogatories dated March 14, 2024	H, UP, I		
D-134	The Parties' Joint Stipulation for The Release of Evidence Held by Florida Highway Patrol dated September 10, 2024	H, UP, I		
<b>Miscellaneous</b>				
D-135	Scale models of 2019 Model S	Rule 26		
D-136	Scale models of 2010 Chevrolet Tahoe	Rule 26		
D-137	Exemplar 2019 Tesla Model S	Rule 26		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-138	Exemplars of all alerts, instructions, notifications and warnings from the 2019 Model S related to vehicle operation including, but not limited to, Autopilot, Traffic Aware Cruise Control, Autosteer, hands on steering wheel, AEB, FCW, Lane departure, and blind spot.	Rule 26		
D-139	Aerial or Google views of the route driven by George McGee and intersection of accident	No Obj		
D-140	All materials contained in Plaintiffs' experts' file contents to be used for impeachment	R, H		
D-141	Responses to NTSB Safety Recommendation H-17-041 from BMW.	R, H		
D-142	Responses to NTSB Safety Recommendation H-17-041 from Mercedes-Benz.	R, H		
D-143	Responses to NTSB Safety Recommendation H-17-041 from Nissan.	R, H		
D-144	Responses to NTSB Safety Recommendation H-17-041 from Volvo.	R, H		
D-145	Responses to NTSB Safety Recommendation H-17-041 from Volkswagen Group.	R, H		
D-146	Standard - SAE J3016 2018	R, H		
D-147	Standard - SAE J3016 2021	R, H		
D-148	Standard - Euro NCAP Version 2.0 (March 2017)	R, H		
D-149	Standard - UN Regulation No. 79 (2017 and amendments from 2018 - 2022)	R, H		
D-150	Standard - NHTSA Levels of automation	R, H		
D-151	Standard - NHTSA NCAP	R, H		
D-152	Standard - ISO 26262	R, H		
D-153	Standard - ISO 21448	R, H		
D-154	Cars.com article, "Which 2017 Cars Can Drive Themselves?"	R, H		
D-155	Cars.com article, "Self-Driving Features: 187 Cars that Have 'Em for 2018"	R, H		
D-156	Cars.com article, "Which Cars Have Self-Driving Features for 2019?"	No Obj		
D-157	Cars.com article, "Which Cars Have Self-Driving Features for 2020?"	R, H		
D-158	Cars.com article, "Which Cars Have Self-Driving Features for 2021?"	R, H		
D-159	Cars.com article, "Which Cars Have Self-Driving Features for 2022?"	R, H		
D-160	National Center for Statistics and Analysis. (2023, April). <i>Crash Report Sampling System analytical user's manual, 2016-2021</i> (Report No. DOT HS 813 436). National Highway Traffic Safety Administration.	R, H, I, UP		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-161	National Center for Statistics and Analysis. (2023). Distracted driving in 2021 (Research Note. Report No. DOT HS 813 443). National Highway Traffic Safety Administration.	R, H, I, UP		
D-162	National Highway Traffic Safety Administration (2010). Overview of the National Highway Traffic Safety Administration's Driver Distraction Program (Report No. DOT HS 811 299).	R, H, I, UP		
D-163	National Highway Traffic Safety Administration (2013). Visual-manual NHTSA driver distraction guidelines for in-vehicle electronic devices (Federal Register Vol. 78, No. 81).	R, H, I, UP		
D-164	National Highway Traffic Safety Administration (NHTSA, 2020). Distracted Driving 2018. Traffic Safety Facts Research Note.	R, H, I, UP		
D-165	National Highway Traffic Safety Administration (NHTSA, 2022). Automated Vehicle Safety. Retrieved from: <a href="https://www.nhtsa.gov/technology-innovation/automated-vehicles-safety">https://www.nhtsa.gov/technology-innovation/automated-vehicles-safety</a>	R, H, I, UP		
D-166	National Highway Traffic Safety Administration (NHTSA, 2022). Levels of Automation. Retrieved from: <a href="https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-03/Levels_of_Automation_Static_022822-v4-tag.pdf">https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-03/Levels_of_Automation_Static_022822-v4-tag.pdf</a>	R, H, I, UP		
D-167	National Highway Traffic Safety Administration (2022, June). Summary Report: Standing General Order on Crash Reporting for Level 2 Advanced Driver Assistance Systems	R, H, I, UP		
D-168	National Highway Traffic Safety Administration (2023, April). <i>2021 FARS/CRSS coding and validation manual</i> (Report No. DOT HS 813 426). National Highway Traffic Safety Administration.	R, H, I, UP		
D-169	National Research Council. (2011). Reference manual on scientific evidence. 3 <sup>rd</sup> ed. National Academies Press.	R, H, I, UP		
D-170	National Traffic Law Center. (2017). Investigation and prosecution of distracted driving cases (Report No. DOT HS 812 407). National Highway Traffic Safety Administration.	R, H, I, UP		
D-171	NHTSA Braking Testing.	R, H, I, UP		
D-172	NHTSA Crash Imminent Brake System Performance Evaluation for the New Car Assessment Program (October 2015).	R, H, I, UP		
D-173	NHTSA Dynamic Brake Support Performance Evaluation Confirmation Test for the New Car Assessment Program (October 2015).	R, H, I, UP		
D-174	PARTS: Market Penetration of Advanced Driver Assistance Systems (ADAS), December 2021.	R, H, I, UP		
D-175	PARTS: Market Penetration of Advanced Driver Assistance Systems (ADAS), December 2021.	R, H, I, UP		
D-176	SAE International On-Road Automated Driving committee. (2016, 2018, 2021). Taxonomy and definitions for terms	R, H, I, UP		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
	related to driving automation systems on on-road motor vehicles (SAE J3016) SAE International. <a href="https://www.sae.org/">https://www.sae.org/</a>			
<b>Expert Materials</b>				
D-177	David Cades, Ph.D. Curriculum Vitae	R, H		
D-178	Photographs (17) of exemplar Tesla Model S taken on June 20, 2024 by David Cades, Ph.D.	R, H		
D-179	Video files (3) of exemplar Tesla Model S taken on June 20, 2024 by David Cades, Ph.D.	R, H		
D-180	David Cades Expert File	R, H		
D-181	Demonstratives related to analysis and opinions of David Cades, Ph.D.	Reserve		
D-182	Demonstratives related to human factors analysis of incident by David Cades, Ph.D.	Reserve		
D-183	Demonstratives related to rebuttal of plaintiffs' experts for David Cades, Ph.D.	Reserve		
D-184	Cited literature and sources in David Cades, Ph.D. report dated June 24, 2024	R, H, I, UP		
D-185	Cited literature and sources in David Cades, Ph.D. rebuttal report dated July 8, 2024	R, H, I, UP		
D-186	Cited literature and sources in David Cades, Ph.D. second rebuttal report dated December 23, 2024	R, H, I, UP		
D-187	Exponent Driver Monitoring Review 2019	R, H, I, UP		
D-188	Exponent GM Driver Monitoring Review 2019	R, H, I, UP		
D-189	TACC Override Message - demonstrative	R, H		
D-190	Florida Fatal Crashes – "Object Dropped By Driver" – demonstrative	Reserve		
D-191	Florida Traffic Crash Report No. 84544575 dated September 12, 2016	R, H, I		
D-192	Florida Traffic Crash Report No. 85296044 dated March 13, 2016	R, H, I		
D-193	Florida Traffic Crash Report No. 85355609 dated September 19, 2016	R, H, I		
D-194	Florida Traffic Crash Report No. 85521716 dated May 15, 2017	R, H, I		
D-195	Florida Traffic Crash Report No. 85547239 dated November 10, 2017	R, H, I		
D-196	Florida Traffic Crash Report No. 86596565 dated September 11, 2016	R, H, I		
D-197	Florida Traffic Crash Report No. 87178035 dated April 11, 2018	R, H, I		

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D-198	Florida Traffic Crash Report No. 87210362 dated June 4, 2018	R, H, I		
D-199	Florida Traffic Crash Report No. 87229661 dated August 27, 2018	R, H, I		
D-200	Florida Traffic Crash Report No. 87951014 dated June 22, 2018	R, H, I		
D-201	Florida Traffic Crash Report No. 87982633 dated February 25, 2019	R, H, I		
D-202	Florida Traffic Crash Report No. 88363012 dated October 16, 2020	R, H, I		
D-203	Florida Traffic Crash Report No. 88801561 dated June 17, 2019	R, H, I		
D-204	Florida Traffic Crash Report No. 89129679 dated June 10, 2019	R, H, I		
D-205	Florida Traffic Crash Report No. 89266325 dated April 6, 2020	R, H, I		
D-206	Owner's Manual – 2019 Acura MDX	R, H, I		
D-207	Owner's Manual – 2019 Acura RDX	R, H, I		
D-208	Owner's Manual – 2019 Acura RLX	R, H, I		
D-209	Owner's Manual – 2019 Acura TLX	R, H, I		
D-210	Owner's Manual – 2019 Audi A4	R, H, I		
D-211	Owner's Manual – 2019 Audi A5	R, H, I		
D-212	Owner's Manual – 2019 Audi A6	R, H, I		
D-213	Owner's Manual – 2019 Audi A7	R, H, I		
D-214	Owner's Manual – 2019 Audi A8	R, H, I		
D-215	Owner's Manual – 2019 Audi e-tron	R, H, I		
D-216	Owner's Manual – 2019 Audi Q5	R, H, I		
D-217	Owner's Manual – 2019 Audi Q7	R, H, I		
D-218	Owner's Manual – 2019 Audi Q8	R, H, I		
D-219	Owner's Manual – 2019 BMW 5 Series	R, H, I		
D-220	Owner's Manual – 2019 BMW 7 Series	R, H, I		
D-221	Owner's Manual – 2019 BMW 8 Series	R, H, I		
D-222	Owner's Manual – 2019 BMW X3	R, H, I		
D-223	Owner's Manual – 2019 BMW X4	R, H, I		
D-224	Owner's Manual – 2019 BMW X5	R, H, I		
D-225	Owner's Manual – 2019 BMW X7	R, H, I		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-226	Owner's Manual – 2019 Cadillac CT6	No Obj.		
D-227	Owner's Manual – 2019 Ford Edge	R, H, I		
D-228	Owner's Manual – 2019 Genesis G70	R, H, I		
D-229	Owner's Manual – 2019 Genesis G80	R, H, I		
D-230	Owner's Manual – 2019 Genesis G90	R, H, I		
D-231	Owner's Manual – 2019 Honda Accord	R, H, I		
D-232	Owner's Manual – 2019 Honda Civic	R, H, I		
D-233	Owner's Manual – 2019 Honda Calrity	R, H, I		
D-234	Owner's Manual – 2019 Honda CR-V	R, H, I		
D-235	Owner's Manual – 2019 Honda Fit	R, H, I		
D-236	Owner's Manual – 2019 Honda HR-V	R, H, I		
D-237	Owner's Manual – 2019 Honda Insight	R, H, I		
D-238	Owner's Manual – 2019 Honda Odyssey	R, H, I		
D-239	Owner's Manual – 2019 Honda Passport	R, H, I		
D-240	Owner's Manual – 2019 Honda Pilot	R, H, I		
D-241	Owner's Manual – 2019 Honda Ridgeline	R, H, I		
D-242	Owner's Manual – 2019 Hyundai Nexo	R, H, I		
D-243	Owner's Manual – 2019 Infiniti QX50	R, H, I		
D-244	Owner's Manual – 2019 Jaguar F-Pace	R, H, I		
D-245	Owner's Manual – 2019 Jaguar I-Pace	R, H, I		
D-246	Owner's Manual – 2019 Kia K900	R, H, I		
D-247	Owner's Manual – 2019 Kia Niro EV	R, H, I		
D-248	Owner's Manual – 2019 Land Rover Discovery	R, H, I		
D-249	Owner's Manual – 2019 Land Rover Range Rover	R, H, I		
D-250	Owner's Manual – 2019 Land Rover Range Rover Velar	R, H, I		
D-251	Owner's Manual – 2019 Land Rover Range Rover Sport	R, H, I		
D-252	Owner's Manual – 2019 Lexus ES	R, H, I		
D-253	Owner's Manual – 2019 Lexus GS	R, H, I		
D-254	Owner's Manual – 2019 Lexus LC	R, H, I		
D-255	Owner's Manual – 2019 Lexus RX	R, H, I		
D-256	Owner's Manual – 2019 Lexus UX	R, H, I		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-257	Owner's Manual – 2019 Lincoln Nautilus	R, H, I		
D-258	Owner's Manual – 2019 Maserati Ghibli	R, H, I		
D-259	Owner's Manual – 2019 Maserati Levante	R, H, I		
D-260	Owner's Manual – 2019 Maserati Quattroporte	R, H, I		
D-261	Owner's Manual – 2019 Mercedes-Benz C-Class	R, H, I		
D-262	Owner's Manual – 2019 Mercedes-Benz GLE	R, H, I		
D-263	Owner's Manual – 2019 Mercedes-Benz GLS	R, H, I		
D-264	Owner's Manual – 2019 Mercedes-Benz S-Class	R, H, I		
D-265	Owner's Manual – 2019 Mercedes-Benz SL-Class	R, H, I		
D-266	Owner's Manual – 2019 Nissan Altima	R, H, I		
D-267	Owner's Manual – 2019 Nissan Leaf	R, H, I		
D-268	Owner's Manual – 2019 Nissan Rogue	R, H, I		
D-269	Owner's Manual – 2019 Tesla Model 3	R, H, I		
D-270	Owner's Manual – 2019 Tesla Model S	R, H, I		
D-271	Owner's Manual – 2019 Tesla Model X	R, H, I		
D-272	Owner's Manual – 2019 Toyota Corolla Hatchback	R, H, I		
D-273	Owner's Manual – 2019 Toyota RAV 4	R, H, I		
D-274	Owner's Manual – 2019 Volvo S60	R, H, I		
D-275	Owner's Manual – 2019 Volvo S90	R, H, I		
D-276	Owner's Manual – 2019 Volvo V60	R, H, I		
D-277	Owner's Manual – 2019 Volvo V90 Cross Country	R, H, I		
D-278	Owner's Manual – 2019 Volvo V90	R, H, I		
D-279	Owner's Manual – 2019 Volvo XC40	R, H, I		
D-280	Owner's Manual – 2019 Volvo XC 60	R, H, I		
D-281	Owner's Manual – 2019 Volvo XC 90	R, H, I		
D-282	<b>Barry Crown, M.D.</b> Curriculum Vitae	R, H		
D-283	Barry Crown, M.D. Expert File	R, H, I		
D-284	Demonstratives related to analysis and opinions of Barry Crown, M.D.	Reserve		
D-285	Demonstratives related to rebuttal of plaintiffs' experts for Barry Crown, M.D.	Reserve		
D-286	Raw test data for Dillon Angulo (Crown)	R, H, I, UP		

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D-287	<b>Rafael J. Fernandez, Jr., M.D.</b> Curriculum Vitae	R, H		
D-288	Rafael J. Fernandez, Jr., M.D. Expert File	R, H, I		
D-289	Demonstratives related to analysis and opinions of Rafael J. Fernandez, Jr., M.D.	Reserve		
D-290	Demonstratives related to rebuttal of plaintiffs' experts for Rafael J. Fernandez, Jr. M.D.	Reserve		
D-291	<b>Ryan Harrington</b> Curriculum Vitae	R, H		
D-292	Ryan Harrington Expert File	R, H, 4		
D-293	Ryan Harrington demonstrative exhibits	Reserve		
D-294	Demonstratives related to analysis and opinions of Ryan Harrington, M.E.	Reserve		
D-295	Demonstratives related to rebuttal of plaintiffs' experts for Ryan Harrington, M.E.	Reserve		
D-296	Photographs and videos from Exponent NCAP Benchmarking Testing – Human Driver – Mercedes-Benz	R, H, MIL		
D-297	Photographs and videos from Exponent NCAP Benchmarking Testing – Human Driver – Subaru	R, H, MIL		
D-298	Photographs and videos from Exponent NCAP Benchmarking Testing – Human Driver – Volvo	R, H, MIL		
D-299	Photographs and videos from Exponent NCAP Benchmarking Testing – Robot Controller – Mercedes-Benz	R, H, MIL		
D-300	Photographs and videos from Exponent NCAP Benchmarking Testing – Robot Controller – Subaru	R, H, MIL		
D-301	Photographs and videos from Exponent Nighttime Collision Scenario Testing – Mercedes-Benz	R, H, MIL		
D-302	Photographs and videos from Exponent Nighttime Collision Scenario Testing – Subaru	R, H, MIL		
D-303	Photographs and videos from Exponent Nighttime FCW Demonstrations Testing – Mercedes-Benz	R, H, MIL		
D-304	Photographs and videos from Exponent Nighttime FCW Demonstrations Testing – Subaru	R, H, MIL		
D-305	Photographs and videos from Exponent Nighttime FCW Demonstrations Testing – Volvo	R, H, MIL		
D-306	VIN Decode 5YJSA1E24KF302997 2.pdf	R, H, I		
D-307	Tesla Moving Objects Manual [BENAVIDES-00002092]	No Obj. to select pages; R, H to others		
D-308	Annotated Video [HIGHLY CONF - BENAVIDES-00007638]	No Obj.		
D-309	Annotated Images (Exh A_main4-2.mp4)	Reserved		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-310	Aerial diagrams depicting Tesla locations prior to impact [R. Harrington]	Reserved		
D-311	AAA. Automatic Emergency Braking with Pedestrian Detection. 2019. Available at: <a href="https://www.aaa.com/AAA/common/aar/files/Research-Report-Pedestrian-Detection.pdf">https://www.aaa.com/AAA/common/aar/files/Research-Report-Pedestrian-Detection.pdf</a>	R, H, I, UP		
D-312	Campbell, J., Brown, J., Graving, J., Richard, C., Lichty, M., Sanquist, T., Bacon, P., Woods, R., Li, H., Williams, D., and Morgan, J., "Human Factors Design Guidance for Driver-Vehicle Interfaces," Battelle Memorial Institute, DOT HS 812 360, December 2016.	R, H, I, UP		
D-313	Cicchino, J.B., and Zuby, D. 2019. Characteristics of rear-end crashes involving passenger vehicles with automatic emergency braking. Traffic Injury Prevention, 10(S1).	R, H, I, UP		
D-314	EuroNCAP. Ratings & Rewards. Available at: <a href="https://www.euroncap.com/en/">https://www.euroncap.com/en/</a> . Accessed June 2024.	R, H, I, UP		
D-315	IIHS. Advanced Driver Assistance. Available at: <a href="https://www.iihs.org/topics/advanced-driverassistance">https://www.iihs.org/topics/advanced-driverassistance</a> . Accessed June 2024.	R, H, I, UP		
D-316	IIHS. Vehicle Ratings. Available at: <a href="http://www.iihs.org/iihs/ratings">http://www.iihs.org/iihs/ratings</a> . Accessed June 2024	R, H, I, UP		
D-317	IIHS Frontal Crash Tests. About our Tests. Available at: <a href="https://www.iihs.org/ratings/about-ourtests#front-crash-prevention-tests-2013-present">https://www.iihs.org/ratings/about-ourtests#front-crash-prevention-tests-2013-present</a> . Accessed June 2024.	R, H, I, UP		
D-318	IIHS. 2013. IIHS issues first crash avoidance ratings under new test program. Available at: <a href="https://www.iihs.org/news/detail/iihs-issues-first-crash-avoidance-ratings-under-new-testprogram">https://www.iihs.org/news/detail/iihs-issues-first-crash-avoidance-ratings-under-new-testprogram</a> . Accessed June 2024.	R, H, I, UP		
D-319	IIHS. 2017 Tesla Model S, <a href="https://www.iihs.org/ratings/vehicle/Tesla/model-s-4-doorhatchback/2017">https://www.iihs.org/ratings/vehicle/Tesla/model-s-4-doorhatchback/2017</a> (Accessed June 2024)	R, H, I, UP		
D-320	IIHS. 2018. Crash avoidance and driver assistance technologies — are they used? Available at: <a href="https://www.iihs.org/research-areas/bibliography/ref/2140">https://www.iihs.org/research-areas/bibliography/ref/2140</a> . Accessed June 2024.	R, H, I, UP		
D-321	IIHS. 2019. Autobrake is good, but it could be better. Available at: <a href="https://www.iihs.org/news/detail/autobrake-is-good-but-it-could-be-better">https://www.iihs.org/news/detail/autobrake-is-good-but-it-could-be-better</a> . Accessed June 2024.	R, H, I, UP		
D-322	IIHS. 2022. Effects of automatic emergency braking systems on pedestrian crash risk? Available at: <a href="https://www.iihs.org/topics/bibliography/ref/2243">https://www.iihs.org/topics/bibliography/ref/2243</a> . Accessed June 2024	R, H, I, UP		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-323	IIHS. 2024. Few small SUVs excel in new IIHS front crash prevention test. Available at: <a href="https://www.iihs.org/news/detail/few-small-suvs-excel-in-new-iihs-front-crash-prevention-test">https://www.iihs.org/news/detail/few-small-suvs-excel-in-new-iihs-front-crash-prevention-test</a> . Accessed in June 2024.	R, H, I, UP		
D-324	IIHS/HLDI. Benefits from advanced driver assistance systems are growing, new HLDI study find. April 16, 2020.	R, H, I, UP		
D-325	Leslie, A., et al., 2021. Field effectiveness of General Motors advanced driver assistance and headlighting systems, Accident Analysis and Prevention, 159.	R, H, I, UP		
D-326	NHTSA. <a href="https://www.nhtsa.gov/">https://www.nhtsa.gov/</a> (Accessed June 2024)	R, H, I		
D-327	NHTSA. Automated Vehicles for Safety. Available at: <a href="https://www.nhtsa.gov/technology-innovation/automated-vehicles-safety">https://www.nhtsa.gov/technology-innovation/automated-vehicles-safety</a> . Accessed June 2024.	R, H, I, UP		
D-328	NHTSA. Driver Assistance Technologies. Available at: <a href="https://www.nhtsa.gov/vehiclesafety/driver-assistance-technologies">https://www.nhtsa.gov/vehiclesafety/driver-assistance-technologies</a> . Accessed June 2025.	R, H, I, UP		
D-329	NHTSA. Ratings. Available at: <a href="https://www.nhtsa.gov/ratings">https://www.nhtsa.gov/ratings</a> . Accessed June 2024.	R, H, I, UP		
D-330	NHTSA. 2005. Automotive Collision Avoidance System Field Operational Test, Final Program Report. DOT HS 809 886. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-331	NHTSA. 2008. Forward Crash Warning System Confirmation Test. Docket No. NHTSA-2007-27662-0014. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-332	NHTSA. 2010. Forward Crash Warning System Confirmation Test. Docket No. NHTSA-2006-26555-0128. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-333	NHTSA. 2012. Crash Imminent Braking System Performance Evaluation. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-334	NHTSA. 2012. Dynamic Brake Support System Performance Evaluation. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-335	NHTSA. 2012. Forward-Looking Advanced Braking Technologies Research Report. Docket No. NHTSA-2012-0057-0001. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-336	NHTSA. 2013. Forward Collision Warning System Confirmation Test. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-337	NHTSA. 2014. Automatic Emergency Braking System (AEB) Research Report. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-338	NHTSA. 2015. Crash Imminent Brake System Performance Evaluation for the New Car Assessment Program. Docket No. NHTSA-2015-0006-0025. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-339	NHTSA. 2016. Safety-Related Defects and Automated Safety Technologies. Docket No. NHTSA-2016-0040-0040. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-340	NHTSA. 2016 Tesla Model S 75 <a href="https://www.nhtsa.gov/vehicle/2016/TESLA/MODEL%252520S%25252075/5%252520HB/RWD">https://www.nhtsa.gov/vehicle/2016/TESLA/MODEL%252520S%25252075/5%252520HB/RWD</a> (Accessed June 2024)	R, H, I, UP		
D-341	NHTSA. 2019. Crash Imminent Brake System Confirmation Test – 2019 Mercedes-Benz S450. NCAP-DRI-CIB-19-18. Docket No. NHTSA-2015-0006-0117. National Highway Traffic Safety Administration, Washington DC	R, H, I, UP		
D-342	NHTSA. 2019. NHTSA Announces Update to Historic AEB Commitment by 20 Automakers. Available at: <a href="https://www.nhtsa.gov/press-releases/nhtsa-announces-update-hisotric-aeb-commitment-20-automakers">https://www.nhtsa.gov/press-releases/nhtsa-announces-update-hisotric-aeb-commitment-20-automakers</a>	R, H, I, UP		
D-343	NHTSA. 2019 Tesla Model S 75D, <a href="https://www.nhtsa.gov/vehicle/2019/TESLA/MODEL%252520S%25252075D/5%252520HB/AWD">https://www.nhtsa.gov/vehicle/2019/TESLA/MODEL%252520S%25252075D/5%252520HB/AWD</a> (Accessed June 2024)	R, H, I, UP		
D-344	NHTSA. 2020. Crash Imminent Brake System Research Test – 2020 Subaru Outback Premium/LDD. NCAP-DRI-CIBHS-2006. Docket No. NHTSA-2020-0002-0002. National Highway Traffic Safety Administration, Washington, DC.	R, H, I, UP		
D-345	NHTSA. 2020. Crash Imminent Brake System Research Test - 2020 Volvo S60 T6 AWD Momentum. NCAP-DRI-CIBHS-20-08. Docket No. NHTSA-2021-0002-0002. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-346	NHTSA. 2020. New Car Assessment Program Crash Imminent Brake System Confirmation Test -2020 Subaru Outback Premium/LDD. NCAP-DRI-CIB-20-13. Docket No. NHTSA-2020-0001-0051. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-347	NHTSA. 2020. New Car Assessment Program Crash Imminent Brake System Confirmation Test -2020 Volvo S60 T6 AWD Momentum. NCAP-DRI-CIB-20-15.	R, H, I, UP		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
	Docket No. NHTSA-2020-0001-0019. National Highway Traffic Safety Administration, Washington DC.			
D-348	NHTSA. 2021. NHTSA Orders Crash Reporting for Vehicles Equipped with Advanced Driver Assistance Systems and Automated Driving Systems. Available at: <a href="https://www.nhtsa.gov/pressreleases/nhtsa-orders-crash-reporting-vehicles-equipped-advanced-driver-assistance-systems">https://www.nhtsa.gov/pressreleases/nhtsa-orders-crash-reporting-vehicles-equipped-advanced-driver-assistance-systems</a> . Accessed June 2024.	R, H, I, UP		
D-349	NHTSA. 2022. NHTSA Levels of Automation. Available at: <a href="https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-05/Level-of-Automation-052522-tag.pdf">https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-05/Level-of-Automation-052522-tag.pdf</a> . Accessed June 2024.	R, H, I, UP		
D-350	NHTSA. 2023. NHTSA's 2022 Light Vehicle Automatic Emergency Braking Research Test Summary. Docket No. NHTSA-2023-0021-0005, attachment 2. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-351	NHTSA. 2022. Final MY2019/MY2020 Research Reports for Pedestrian Automatic Emergency Braking, High-Speed Crash Imminent Braking, Blind Spot Warning, and Blind Spot Intervention Testing. Docket No. NHTSA-2021-0002-0002. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-352	NHTSA. 2024. NHTSA Finalizes Key Safety Rule to Reduce Crashes and Save Lives. Available at: <a href="https://www.nhtsa.gov/press-releases/nhtsa-fmvss-127-automatic-emergency-braking-reducecrashes">https://www.nhtsa.gov/press-releases/nhtsa-fmvss-127-automatic-emergency-braking-reducecrashes</a> . Accessed June 2024.	R, H, I, UP		
D-353	Nodine E., A. Lam, S. Stevens, M. Razo, W. Najm. 2011. Integrated Vehicle-Based Safety Systems (IVBSS) - Light Vehicle Field Operational Test: Independent Evaluation, Final Report. DOT HS 811 516. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-354	Reagan, I.J., et al. 2017. Crash Avoidance and Driver Assistance Technologies – Are They Used?“, Transportation Research Part F, 52(2018)	R, H, I, UP		
D-355	Shutko, J., et al. 2018. Driver Behavior While Operating Partially Automated Systems: Tesla Autopilot Case Study. SAE Technical Paper 2018-01-0497.	R, H, I, UP		
D-356	S.M. Russell et al. Naturalistic Study of Level 2 Driving Automation Functions. Report No. DOT HS 812 642. November 2018.	R, H, I, UP		
D-357	Target Crash population for Crash Avoidance Technologies in Passenger Vehicles. DOT HS 812 653. National Highway Traffic Safety Administration, Washington DC. 2019.	R, H, I, UP		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-358	Thorn, E. Kimmel, S., & Chaka, M. (2018, September). A Framework for Automated Driving System Testable Cases and Scenarios (Report No. DOT HS 812 623). Washington, DC: National Highway Traffic Safety Administration.	R, H, I, UP		
D-359	Ward's Automotive Yearbook. Available at: <a href="https://www.wardsauto.com/miscellaneous/wards-automotive-yearbook">https://www.wardsauto.com/miscellaneous/wards-automotive-yearbook</a>	R, H, I, UP		
D-360	NHTSA. 2011. Quick Reference Guide (2010 Version) to Federal Motor Vehicle Safety Standards and Regulations. DOT HS 811 439	R, H, I, UP		
D-361	NHTSA. 2011. New Car Assessment Program (NCAP); Safety Labeling, Final Rule. 76 FR 45453	R, H, I, UP		
D-362	NHTSA. 2015. New Car Assessment Program (NCAP); Final Decision. 80 FR 68604	R, H, I, UP		
D-363	NHTSA. 2017. Federal Motor Vehicle Safety Standards: Automatic Emergency Braking; Denial of petition for rulemaking. 82 FR 8391.	R, H, I, UP		
D-364	NHTSA. 2022. Request for Comments on New Car Assessment Program. Docket No. NHTSA-2021-0002. National Highway Traffic Safety Administration, Washington D	R, H, I, UP		
D-365	NHTSA. 2023. Notice of proposed rulemaking (NPRM); Federal Motor Vehicle Safety Standards: Automatic Emergency Braking for Light Vehicles. Docket No. NHTSA-2023-0021. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-366	NHTSA. 2023. Memorandum and Preliminary Regulatory Impact Analysis (PRIA); Federal Motor Vehicle Safety Standard No. 127; Light Vehicle Automatic Emergency Braking (AEB); AEB Test Devices. Docket No. NHTSA-2023-0021-0004. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-367	NHTSA. 2024. Final rule; Federal Motor Vehicle Safety Standards; Automatic Emergency Braking for Light Vehicles. Docket No. NHTSA-2023-0021. National Highway Traffic Safety Administration, Washington DC.	R, H, I, UP		
D-368	SAE International. 2018. Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles. SAE J3016	R, H, I, UP		
D-369	SAE International. J3016 Levels of Driving Automation graphic," SAE International, <a href="https://www.sae.org/binaries/content/assets/cm/content/blog/sae-j3016-visual-chart_5.3.21.pdf">https://www.sae.org/binaries/content/assets/cm/content/blog/sae-j3016-visual-chart_5.3.21.pdf</a> , posted May 2021, Accessed June 2024.	R, H, I, UP		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
D-370	U.S. DOT Rulemaking Process. Available at: <a href="https://www.transportation.gov/regulations/rulemaking-process">https://www.transportation.gov/regulations/rulemaking-process</a> . Accessed June 2024.	R, H, I, UP		
D-371	U.S. Federal Register. Vol. 87 No. 46, 13477. 2022.	R, H, I, UP		
D-372	2001 Mercedes-Benz CL-Class Brochure	R, H, I, UP		
D-373	2001 Mercedes-Benz S-Class Brochure	R, H, I, UP		
D-374	2006 Acura RL Press Kit. Available at: <a href="https://acuranews.com/en-US/releases/release-2aa2027d1a0b48369492d8004c34c1b9-2006-acura-rl-introduction">https://acuranews.com/en-US/releases/release-2aa2027d1a0b48369492d8004c34c1b9-2006-acura-rl-introduction</a> . Accessed in June 2024.	R, H, I, UP		
D-375	Owner's Manual – 2019 Cadillac XTS	No Obj		
D-376	Owner's Manual – 2019 Lexus LS	R, H, I, UP		
D-377	Owner's Manual – 2019 Subaru Outback	R, H, I, UP		
D-378	Owner's Manual – 2019 Subaru EyeSight	R, H, I, UP		
D-379	Owner's Manual – 2023 Ford Mustang MACH-E	R, H, I, UP		
D-380	Continental ARS4-B Advanced Radar Sensor datasheet.	R, H, I, UP		
D-381	Electrek. 2019. Tesla releases Autopilot update with new speed adjustments, stop sign warnings, and more. Available at: <a href="https://electrek.co/2019/12/06/tesla-update-autopilot-adjust-speed-stop-sign-warning/">https://electrek.co/2019/12/06/tesla-update-autopilot-adjust-speed-stop-sign-warning/</a> . Accessed June 2024.	R, H, I, UP		
D-382	Electrek. 2020. Tesla releases new, highly anticipated Traffic Light and Stop Sign Control feature. Available at: <a href="https://electrek.co/2020/04/24/tesla-autopilot-traffic-light-and-stop-sign-control-feature">https://electrek.co/2020/04/24/tesla-autopilot-traffic-light-and-stop-sign-control-feature</a>	R, H, I, UP		
D-383	GMC. About intersection automatic emergency braking. Available at: <a href="https://www.gmc.com/support/vehicle/driving-safety/brakes/automatic-emergency-braking">https://www.gmc.com/support/vehicle/driving-safety/brakes/automatic-emergency-braking</a> . Accessed June 2024.	R, H, I, UP		
D-384	GMC. What is Super Cruise. Available at: <a href="https://www.gmc.com/connectivity-technology/supercruise">https://www.gmc.com/connectivity-technology/supercruise</a> . Accessed June 2024.	R, H, I, UP		
D-385	GM. GM Super Cruise offers the most hands-free miles in North America. Available at: <a href="https://news.gm.com/home.detail.html/Pages/news/us/en/2024/feb/0215-supercruise.html">https://news.gm.com/home.detail.html/Pages/news/us/en/2024/feb/0215-supercruise.html</a>	R, H, I, UP		
D-386	J.D. Power. What is Traffic-Sign Recognition. Available at: <a href="https://www.jdpower.com/cars/shopping-guides/what-is-traffic-sign-recognition">https://www.jdpower.com/cars/shopping-guides/what-is-traffic-sign-recognition</a> . Accessed June	R, H, I, UP		

DEF No.	DESCRIPTION Bates Range / Other Source	OBJECTION	Date Identified	Date Admitted
	2024.			
D-387	Motor Trend. 2006. Mercedes-Benz CL-Class Protects Drivers With Pre-Safe System. Available at: <a href="https://www.motortrend.com/news/news060815-mercedes-benz-cl-class-pre-safe-system/">https://www.motortrend.com/news/news060815-mercedes-benz-cl-class-pre-safe-system/</a> . Accessed June 2024.	R, H, I, UP		
D-388	Super Cruise Convenience & Personalization Guide 2024	R, H, I, UP		
D-389	Tesla Model S Generations. Available at: <a href="https://www.autolist.com/tesla-model+s/tesla-model+sgenerations">https://www.autolist.com/tesla-model+s/tesla-model+sgenerations</a> . Accessed June 2024.	R, H, I, UP		
D-390	“Tesla rolls out AutoSteer Stop Light Warning for Autopilot in latest software update,” Available at: <a href="https://www.teslarati.com/tesla-autopilot-autosteer-stop-light-warning/">https://www.teslarati.com/tesla-autopilot-autosteer-stop-light-warning/</a>	R, H, I, UP		
D-391	Update 2019.8.4 - Release Notes, Available at: <a href="https://www.notateslaapp.com/softwareupdates/version/2019.8.4/release-notes">https://www.notateslaapp.com/softwareupdates/version/2019.8.4/release-notes</a> . Accessed December 2024.	R, H, I, UP		
D-392	CARS_2016_What cars have self- driving features	R, H, I, UP		
D-393	CARS_2017_What cars have self- driving features	R, H, I, UP		
D-394	CARS_2018_What cars have self- driving features	R, H, I, UP		
D-395	CARS_2019_What cars have self- driving features	R, H, I, UP		
D-396	CARS_2020_What cars have self- driving features	R, H, I, UP		
D-397	CARS_2021_What cars have self- driving features	R, H, I, UP		
D-398	CARS_2022_What cars have self- driving features	R, H, I, UP		
D-399	BMW 7 Series, i7 EV Prototype Review_ BMW Joins the Hands-Free Driving Fight 2019	R, H, I, UP		
D-400	Brochure BMW_US 7Series_2015	R, H, I, UP		
D-401	Brochure BMW_US 7Series_2016	R, H, I, UP		
D-402	Owner's Manual BMW_US 7Series_2015	R, H, I, UP		
D-403	Owner's Manual BMW_US 7Series_2016	R, H, I, UP		
D-404	Presentation_2016_Werner Huber	R, H, I, UP		
D-405	Response to NTSB Safety Recommendation H-17-041	No Obj		
D-406	Brochure Ford_US Edge_2018	R, H, I, UP		
D-407	Brochure Ford_US Edge_2019	R, H, I, UP		
D-408	Brochure Lincoln_US Nautilus_2019	R, H, I, UP		
D-409	Owner's Manual – Ford US Edge 2018	R, H, I, UP		
D-410	Owner's Manual - Ford US Edge_2019	R, H, I, UP		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-411	Owner's Manual - Lincoln US Nautilus 2019	R, H, I, UP		
D-412	2019-cad-ct6-super-cruise-personalization	R, H, I, UP		
D-413	Brochure 2017 GM Cadillac CT6	R, H, I, UP		
D-414	Brochure 2017 GM Cadillac CT6 plug in	R, H, I, UP		
D-415	Brochure 2018 GM Cadillac CT6	R, H, I, UP		
D-416	Owner's Manual – Cadillac Super Cruise – Hands Free Driving	R, H, I, UP		
D-417	Owner's Manual – 2017 GM Cadillac CT6	R, H, I, UP		
D-418	Owner's Manual – 2018 GM Cadillac CT6	R, H, I, UP		
D-419	Brochure 2013_Acura_MDX	R, H, I, UP		
D-420	Brochure 2013_Acura_MDX_factsheet	R, H, I, UP		
D-421	Brochure 2014_Acura_MDX_v1	R, H, I, UP		
D-422	Brochure 2014_Acura_MDX_v2	R, H, I, UP		
D-423	Brochure 2014_Acura_RLX_factsheet	R, H, I, UP		
D-424	Brochure 2014_Acura_RLX_v1	R, H, I, UP		
D-425	Brochure 2014_Acura_RLX_v2	R, H, I, UP		
D-426	Owner's Manual 2013_Acura_MDX_with_advanced_package	R, H, I, UP		
D-427	Owner's Manual 2013_Acura_MDX_with_technology_package	R, H, I, UP		
D-428	Owner's Manual 2014_Acura_MDX_with_advance_package	R, H, I, UP		
D-429	Owner's Manual 2014_Acura_MDX_with_technology_package	R, H, I, UP		
D-430	Owner's Manual 2014_Acura_RLX_with_advanced_package	R, H, I, UP		
D-431	Owner's Manual 2014_Acura_RLX_with_technology_package	R, H, I, UP		
D-432	Owner's Manual 2019_Acura_TLX	R, H, I, UP		
D-433	Brochure 2018_Kia_Stinger	R, H, I, UP		
D-434	Owner's Manual 2018_Kia_Stinger	R, H, I, UP		
D-435	Brochure 2018_Jaguar_F_Pace	R, H, I, UP		
D-436	Brochure 2018_Land_Rover_Discovery	R, H, I, UP		
D-437	Brochure 2018_Land_Rover_RangeRover_coupe	R, H, I, UP		
D-438	Brochure 2018_Land_Rover_RangeRover_v1	R, H, I, UP		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-439	Brochure 2018_Land_Rover_RangeRover_v2	R, H, I, UP		
D-440	Brochure 2019_Jaguar_F_Pace	R, H, I, UP		
D-441	Brochure 2019_Jaguar_I_Pace_concept	R, H, I, UP		
D-442	Brochure 2019_Jaguar_I_Pace_v1	R, H, I, UP		
D-443	Brochure 2019_Jaguar_I_Pace_v2	R, H, I, UP		
D-444	Brochure 2019_Land_Rover_Discovery	R, H, I, UP		
D-445	Brochure 2019_Land_Rover_RangeRover	R, H, I, UP		
D-446	WebOwner's Manual 2019 Jaguar F Pace Steering Assist Limitations	R, H, I, UP		
D-447	2020 Mazda3 Speculations	R, H, I, UP		
D-448	2021 Mazda3 2.5 Turbo Specifications	R, H, I, UP		
D-449	Brochure 2020_Mazda_3	R, H, I, UP		
D-450	Brochure 2020_Mazda_CX30	R, H, I, UP		
D-451	Brochure 2021_Mazda_3	R, H, I, UP		
D-452	Brochure 2021_Mazda_CX30	R, H, I, UP		
D-453	Owner's Manual 2020_Mazda_3	R, H, I, UP		
D-454	Owner's Manual 2020_Mazda_CX30	R, H, I, UP		
D-455	Owner's Manual 2021_Mazda_3_Hatchback	R, H, I, UP		
D-456	Owner's Manual 2021 Mazda 3 Sedan	R, H, I, UP		
D-457	Owner's Manual 2021 Mazda CX30	R, H, I, UP		
D-458	Brochure 2013 Mercedes S Class	R, H, I, UP		
D-459	Brochure 2014 Mercedes S Class	R, H, I, UP		
D-460	Owner's Manual 2013 Mercedes S Class	R, H, I, UP		
D-461	Owner's Manual 2014 Mercedes S Class	R, H, I, UP		
D-462	Response to NTSB Safety Recommendation H-17-041	No Obj		
D-463	The new Mercedes-Benz S-Class 2020	R, H, I, UP		
D-464	Brochure 2022 Mitsubishi Outlander	R, H, I, UP		
D-465	Mitsubishi_What is MiPilot Assist	R, H, I, UP		
D-466	Owner's Manual 2022_Mitsubishi_outlander	R, H, I, UP		
D-467	2019-Rogue-owner-manual	R, H, I, UP		
D-468	Owner's Manual 2018_Nissan_Rogue	R, H, I, UP		
D-469	Response to NTSB Safety Recommendation H-17-041	R, H, I, UP		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-470	2019-ghibli	R, H, I, UP		
D-471	Brochure 2017_Maserati_Ghibli	R, H, I, UP		
D-472	Brochure 2017_Maserati_Levante	R, H, I, UP		
D-473	Brochure 2017_Maserati_quattroporte	R, H, I, UP		
D-474	Brochure 2018_Maserati_Ghibli	R, H, I, UP		
D-475	Brochure 2018_Maserati_Levante_v1	R, H, I, UP		
D-476	Brochure 2018_Maserati_Levante_v2	R, H, I, UP		
D-477	Brochure 2018_Maserati_quattroporte	R, H, I, UP		
D-478	Owner's Manual 2017_Maserati_Ghibli	R, H, I, UP		
D-479	Owner's Manual 2017_Maserati_Levante	R, H, I, UP		
D-480	Owner's Manual 2017_Maserati_Quattroporte	R, H, I, UP		
D-481	Owner's Manual 2018_Maserati_Ghibli	R, H, I, UP		
D-482	Owner's Manual 2018_Maserati_Levante	R, H, I, UP		
D-483	Owner's Manual 2018_Maserati_Quattroporte	R, H, I, UP		
D-484	Brochure 2019_Subaru_Forester	R, H, I, UP		
D-485	Brochure 2019_Subaru_Legacy	R, H, I, UP		
D-486	Brochure 2019_Subaru_Outback	R, H, I, UP		
D-487	Brochure 2020_Subaru_Forester	R, H, I, UP		
D-488	Brochure 2020_Subaru_Legacy	R, H, I, UP		
D-489	Brochure 2020_Subaru_Outback	R, H, I, UP		
D-490	Owner's Manual 2020_Eyesight	R, H, I, UP		
D-491	Tesla_2015_Your Autopilot has Arrived	R, H, I, UP		
D-492	Tesla_Model_S_Software_7_0_screenshot	R, H, I, UP		
D-493	Tesla_model_s_software_7_1	R, H, I, UP		
D-494	Brochure 2015_Lexus_US GS	R, H, I, UP		
D-495	Brochure 2015_Lexus_US RX	R, H, I, UP		
D-496	Brochure 2016_Lexus_US ES	R, H, I, UP		
D-497	Brochure 2016_Lexus_US GS	R, H, I, UP		
D-498	Brochure 2016_Lexus_US IS	R, H, I, UP		
D-499	Brochure 2016_Lexus_US LS	R, H, I, UP		
D-500	Brochure 2016_Lexus_US RX	R, H, I, UP		

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D-501	Owner's Manual 30G96U_Lexus_GS_2019	R, H, I, UP		
D-502	Owner's Manual 2015_Lexus_GS350_OM30F69U	R, H, I, UP		
D-503	Owner's Manual 2015_Lexus_GS350_200t_GS F_OM30E86U	R, H, I, UP		
D-504	Owner's Manual 2015_Lexus_LS460_OM50E76U	R, H, I, UP		
D-505	Owner's Manual 2016_Lexus_RX350_OM48E90U	R, H, I, UP		
D-506	Owner's Manual 2015_Lexus_RX450_OM0E01U	R, H, I, UP		
D-507	Brochure 2014 Volvo XC90	R, H, I, UP		
D-508	Brochure 2016 Volvo XC90 v1	R, H, I, UP		
D-509	Brochure 2016 Volvo XC90 v2	R, H, I, UP		
D-510	Owner's Manual 2014 Volvo XC90	R, H, I, UP		
D-511	Owner's Manual 2016 Volvo XC90	R, H, I, UP		
D-512	Volvo 2015 Volvo Cars reveals safe and seamless user interface for self-driving cars	R, H, I, UP		
D-513	2019-audi-a4-s4-73456	R, H, I, UP		
D-514	Brochure 2015_Q7_v1	R, H, I, UP		
D-515	Brochure 2015_Q7_v2	R, H, I, UP		
D-516	Brochure 2016_audi_A4_S4	R, H, I, UP		
D-517	Brochure 2017_audi_A4	R, H, I, UP		
D-518	Brochure 2017_Q7	R, H, I, UP		
D-519	Owner's Manual 2015_audi_q7	R, H, I, UP		
D-520	Owner's Manual 2016_audi_a4_s4	R, H, I, UP		
D-521	Owner's Manual 2017_audi_a4	R, H, I, UP		
D-522	Owner's Manual 2017_audi_q7	R, H, I, UP		
D-523	<b>James Walker, Jr.</b> Curriculum Vitae	R, H		
D-524	James Walker, Jr. Expert File	R, H, I, UP		
D-525	James Walker, Jr. demonstrative exhibits	Reserve		
D-526	Demonstratives related to analysis and opinions James Walker, Jr.	Reserve		
D-527	Demonstratives related to rebuttal of plaintiffs' experts for James Walker, Jr.	Reserve		
D-528	Inspection photographs (421) of 2010 Chevy Tahoe taken on July 20, 2021 - Exterior	R, H, I		
D-529	Inspection photographs (91) of 2010 Chevy Tahoe taken on July 20, 2021 - Interior	R, H, I		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-530	Inspection photographs (14) of 2010 Chevy Tahoe taken on July 20, 2021 - Overall	R, H, I		
D-531	Inspection photographs (51) of 2010 Chevy Tahoe taken on July 20, 2021 - Suspension	R, H, I		
D-532	Inspection photographs (58) of 2010 Chevy Tahoe taken on July 20, 2021 - Underhood	R, H, I		
D-533	CEI Vehicle Inspection Notes of 2010 Chevy Tahoe from July 20, 2021 inspection	R, H, I		
D-534	Inspection photographs (534) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos - Front	R, H, I		
D-535	Inspection photographs (225) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos - Hood	R, H, I		
D-536	Inspection photographs (165) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos – LF Fender	R, H, I		
D-537	Inspection photographs (138) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos – LF Tire	R, H, I		
D-538	Inspection photographs (183) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos – LR Door	R, H, I		
D-539	Inspection photographs (227) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos – LR Tire	R, H, I		
D-540	Inspection photographs (401) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos - Overall	R, H, I		
D-541	Inspection photographs (283) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos - Rear	R, H, I		
D-542	Inspection photographs (176) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos – RF Tire	R, H, I		
D-543	Inspection photographs (209) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos - Roof	R, H, I		
D-544	Inspection photographs (190) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos – RR Tire	R, H, I		
D-545	Inspection photographs (200) of 2019 Tesla Model S taken on November 16, 2021 – Data Photos - Windshield	R, H, I		
D-546	Inspection photographs (8) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll H Brakes	R, H, I		
D-547	Inspection photographs (48) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll I Front	R, H, I		
D-548	Inspection photographs (31) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll J Hood	R, H, I		
D-549	Inspection photographs (4) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll K Interior	R, H, I		
D-550	Inspection photographs (9) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll L LF Fender	R, H, I		
D-551	Inspection photographs (17) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll M LF Tire	R, H, I		
D-552	Inspection photographs (17) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll N Loose Parts	R, H, I		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-553	Inspection photographs (148) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll O LR Door	R, H, I		
D-554	Inspection photographs (16) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll P LR Tire	R, H, I		
D-555	Inspection photographs (13) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll Q Overall and ID	R, H, I		
D-556	Inspection photographs (17) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll R RF Tire	R, H, I		
D-557	Inspection photographs (16) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll S RR Tire	R, H, I		
D-558	Inspection photographs (11) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll T Suspension	R, H, I		
D-559	Inspection photographs (16) of 2019 Tesla Model S taken on November 16, 2021 – Photos – Roll U Windshield	R, H, I		
D-560	Inspection Scan Data of 2019 Tesla Model S taken on November 16, 2021	R, H, I, UP		
D-561	CEI Vehicle Inspection Notes of 2019 Tesla Model S from November 16, 2021 inspection	R, H, I, UP		
D-562	Scene Inspection photographs (943) taken on September 8, 2021 – Data Photos	R, H, I		
D-563	Scene Inspection Drone photographs (438) taken on September 8, 2021	R, H, I		
D-564	Scene Inspection photographs (140) taken on September 8, 2021 – Roll F	R, H, I		
D-565	Scene Inspection videos (2) taken on September 8, 2021 – Drive Through Video	R, H, I		
D-566	CEI Scene Inspection Notes dated September 8, 2021	R, H, I, UP		
D-567	CEI vehicle inspection photographs (45) and scan data taken on April 8, 2021 – Exemplar 2014 Tesla Model S	R, H, I		
D-568	CEI vehicle inspection data photographs (1037) and scan data taken on April 9, 2021– Exemplar 2014 Tesla Model S	R, H, I		
D-569	CEI vehicle inspection data photographs (1513) and scan data taken on April 12, 2021– Exemplar 2014 Tesla Model S	R, H, I		
D-570	CEI notes re April 8, 9, and 12, 2021 inspection and scan of exemplar 2014 Tesla Model S	R, H, I		
D-571	CEI vehicle inspection photographs (31) and scan data taken on September 8, 2021 – Exemplar 2013 Chevrolet Tahoe	R, H, I		
D-572	CEI vehicle inspection data photographs (709) and scan data taken on September 8, 2021 – Exemplar 2013 Chevrolet Tahoe	R, H, I		
D-573	CEI notes re September 8, 2021 inspection and scan of exemplar 2013 Chevrolet Tahoe	R, H, I		

<b>DEF No.</b>	<b>DESCRIPTION Bates Range / Other Source</b>	<b>OBJECTION</b>	<b>Date Identified</b>	<b>Date Admitted</b>
D-574	Autopilot Strikeouts Per Day graph [Figure 2 - Walker report]	R, H, I, UP		
D-575	Time to Autopilot Re-Engagement After Strikeout graph [Figure 3 – Walker report]	R, H, I, UP		
D-576	Log Data of Final Drive Cycle graph [Figure 4 – Walker report]	R, H, I, UP		
D-577	Google Earth aerial images/demonstratives of area of crash	Reserve		
D-578	CEI Video – drive route to accident scene	R, H, I, UP		
D-579	CEI 3D Scene Models of accident scene	R, H, I, UP		
D-580	CEI 3D Vehicle Model of 2010 Chevrolet Tahoe	R, H, I, UP		
D-581	CEI 3D Vehicle Model of 2019 Tesla Model S	R, H, I, UP		
D-582	Bosch EDR for Chevrolet Tahoe dated July 31, 2019	R, H, I, UP		
D-583	Total Delta-V and PDOF Calculation - Tahoe	R, H, I, UP		
D-584	Tesla EDR Graph – Event 1 Total Crash Severity	R, H, I, UP		
D-585	Total Delta-V and PDOF Calculation - Tesla	R, H, I, UP		
D-586	Diagnostic Log Data Summary	R, H, I, UP		
D-587	Diagnostic Log Data - Distance to Impact & Driver Inputs graph/demonstrative	Reserve		
D-588	Diagnostic Log Data – Time Before Impact & Driver Inputs graph/demonstrative	Reserve		
D-589	Diagnostic Log Data – Time Before Impact & Alerts graph/demonstrative	Reserve		
D-590	Diagnostic Log Data – Time Before Impact (Last 5 minutes) & Alerts graph/demonstrative	Reserve		
D-591	Diagnostic Log Data – Time Before Impact (Last 5 minutes) & Hand Detection graph/demonstrative	Reserve		
D-592	Tesla Video Analysis graphics/demonstrative	Reserve		
D-593	2D Reconstruction Drawings – CEI Drone and Police Survey	Reserve		
D-594	3D Reconstruction analysis/demonstratives route of travel	Reserve		
D-595	3D Reconstruction analysis/demonstratives POI V-1 to V- 2	Reserve		
D-596	3D Reconstruction analysis/demonstratives max engagement	Reserve		
D-597	3D Reconstruction analysis/demonstratives POI to POR	Reserve		
D-598	3D Reconstruction analysis/demonstratives POR	Reserve		
D-599	Reconstruction Summary Chart	Reserve		