

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No. 21-cv-21940-BLOOM/Torres**

**JUROR QUESTIONNAIRE**

Please answer fully all of the following questions:

1. What are your name and date of birth? \_\_\_\_\_ ; \_\_\_\_\_

2. Place of birth: \_\_\_\_\_

3. In what city and county do you currently live? \_\_\_\_\_

4. Please describe your current employment, and past work history.

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5. What is your educational background (i.e., grade school, high school, college, etc.)?

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6. What, if any, degrees or certifications do you have, and what are/were your major areas of study/training?

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7. Please describe your spouse or partner's current and past occupation and describe his/her educational background.

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8. If you have any adult children, describe their level of schooling and/or employment.

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9. Have you served in the military? If so, please describe such service.

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10. Have you ever served on a jury before? If so, state how many times; the type of case; whether the trial was in state or federal court; if you reached a verdict and if you were the foreperson.

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**Yellow** = Plaintiffs propose, Tesla objects

**Green** = Tesla proposes, Plaintiffs object

11. Do you have any strong feelings or attitudes, positive or negative, about personal injury lawsuits? If so, please describe.

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12. Which of the following statements comes closest to your own opinion? (Please circle one)

- (i) Personal injury lawsuits cost companies and consumers too much money
- (ii) Personal injury lawsuits are an important way to make sure products are safe and companies treat consumers fairly
- (iii) I have no strong opinions on personal injury lawsuits one way or the other.

13. If the law allows it and the evidence supports it, would you, as a juror, be able to award damages for the following:

(i)	Medical bills	Yes	No
(ii)	Lost wages	Yes	No
(iii)	Pain and suffering associated with a permanent and disabling injury	Yes	No
(iv)	Pain and suffering associated with the loss of a loved one	Yes	No
(v)	Punitive damages against the defendant for gross negligence	Yes	No
(vi)	Punitive damages against the defendant for intentional misconduct	Yes	No

14. Would you briefly describe any personal hobbies and/or interests you have?

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15. What newspapers and/or magazines (including online sites) do you read regularly or rely on for news/current affairs? Also, what are your favorite T.V./streaming shows and/or social media websites?

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16. If you and/or a close family member or friend has ever been a party to a lawsuit (i.e., sued someone or been sued by someone) please describe the circumstances, including whether you/your close family member/friend were the plaintiff (i.e. the party suing) or the defendant (i.e. the party being sued)

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17. Do you participate in any organizations or groups (community, social, civil, union, religious, political)? \_\_\_\_\_ If yes, please state the name of the group and if you hold a leadership position.

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18. Is there anything in your background or personal feelings which might affect your ability to be fair and impartial to both sides?

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19. Have you ever voluntarily participated in a software beta test? Yes \_\_\_ No \_\_\_

20. To the best of your knowledge have you ever participated in a software beta test without your knowledge? Yes \_\_\_ No \_\_\_

22. Have you read or heard anything (in any media, from family or friends) about Tesla vehicles?  
 YES  NO If yes, please explain what you have read or heard and from what source(s):

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18. Have you owned or driven a vehicle with driver assist features (e.g., adaptive cruise control, lane centering, lane departure assist, etc.)? If so, please identify the year, make and model of the vehicle and describe your experience with those features (e.g., positive, negative, neutral).

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19. Have you driven a Tesla with the Autopilot driver assist feature engaged, or been in a Tesla while the driver had Autopilot engaged?  YES  NO  UNSURE. If yes, describe the circumstances, including if you have owned/leased a Tesla currently or in the past.

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20. How often do you use the following driver-assist features:

	I won't	Sometimes	Regularly	I would, if available
a. Cruise Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Adaptive Cruise	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Lane-Centering	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Lane-Centering with Adaptive Cruise	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

21. Do you have any strong feelings or attitudes, positive or negative, about the company Tesla, Inc., or Tesla vehicles?

YES  NO If yes, please explain:

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For the following questions, please indicate how you feel about each person or entity. Use a scale from 1 to 7, where 1 is “feel extremely negative” and 7 is “feel extremely positive” and you may use any number in between as well.

22. a. Elon Musk:  
Extremely Negative 1 2 3 4 5 6 7 Extremely Positive No opinion

c. Ron DeSantis:  
Extremely Negative 1 2 3 4 5 6 7 Extremely Positive No opinion

d. Amazon:  
Extremely Negative 1 2 3 4 5 6 7 Extremely Positive No opinion

e. Ford:  
Extremely Negative 1 2 3 4 5 6 7 Extremely Positive No opinion

23. Are you now or have you in the past been a caregiver?  YES  NO Please explain:

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24. Have you or anyone close to you ever been in a serious car accident? Tell us about that:

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SPACE FOR ADDITIONAL RESPONSES. Please include the number of the question for which you are supplying additional information. You can also use this as a space to provide additional information that you believe the court or attorneys should be aware of that bears on your ability to serve as a fair and impartial juror.

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### COURT REQUESTED VOIR DIRE

The Parties further requests the Court to inquire of the venire the following areas in addition to the standard questions typically asked of all panel members.

In the alternative, many of the following questions are also contained in similar fashion in the proposed Juror Questionnaire that the parties request be submitted to the venire prior to them being seated in the court room.

1. The nature of this case is as follows: *(some version of the parties neutral statement)*
2. The parties to this case and their respective attorneys are: for plaintiffs Naibel Benavides, Guillermo Benavides, Liliana Benavides, and Dillon Angulo, they are represented by Brett Schreiber, Todd Poses and Adam Boumel. For defendant Tesla, Joel Smith, Tom Branigan, Hilarie Bass and Whitney Cruz. Have you heard of or been acquainted with any of these parties or their attorneys?
3. During the trial of this case, the following witnesses may be called to testify on behalf of the parties. These witnesses are: *(insert final witness list)*
4. Have any of you heard of or been otherwise acquainted with any of the witnesses just named? The parties are not required and might not wish to call all of these witnesses, and they may later find it necessary to call other witnesses.
5. Have any of you heard of, or have you any knowledge of, the car accident that is at issue in this lawsuit? Are any of you familiar with the places or property mentioned in this case?
6. Do any of you believe that a case of this nature should not be brought into court for determination by a jury?
7. Do any of you have any belief or feeling toward any of the parties, attorneys, or witnesses that might be regarded as a bias or prejudice for or against any of them?

Do you have any interest, financial or otherwise, in the outcome of this case?

8. Have any of you served as a juror or witness involving any of these parties, attorneys, or witnesses?
9. Have any of you served as a juror in any other case? (If so, was it a civil or criminal case?) You must understand that there is a basic difference between a civil case and a criminal case. In a criminal case a defendant must be found guilty beyond a reasonable doubt; in a civil case such as this, you need only find that the evidence you accept as the basis of your decision is more convincing, and thus has the greater probability of truth, than the contrary evidence.

In the following questions I will be using the terms "family," "close friend," and "anyone

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with whom you have a significant personal relationship." The term "anyone with whom you have a significant personal relationship" means a domestic partner, life partner, former spouse, or anyone with whom you have an influential or intimate relationship that you would characterize as important.

10. Have you or, to your knowledge, has any member of your family, a close friend, or anyone with whom you have a significant personal relationship ever had any connection with, or any dealings with Tesla?
11. Are any of you or them related to any officer, director, or employee of Tesla to your knowledge?
12. Do you or they own any stock or other interest in Tesla to your knowledge?
13. Have you ever done business as a corporation (or company)?
14. The fact that a corporation is a party in this case must not affect your deliberations or your verdict. You may not discriminate between corporations and natural individuals. Both are persons in the eyes of the law and both are entitled to have a fair and impartial trial based on the same legal standards. Do any of you have any belief or feeling for or against corporations (or companies) that might prevent you from being a completely fair and impartial juror in this case?
15. Have you or any member of your family, a close friend, or anyone with whom you have a significant personal relationship ever sued anyone, or presented a claim against anyone in connection with a matter similar to this case? If so, did the matter terminate satisfactorily so far as you were concerned?
16. Has anyone ever sued you, or presented a claim against you or against any member of your family, a close friend, or anyone with whom you have a significant personal relationship, in connection with a matter similar to this case?
17. Are you or is any member of your family, a close friend, or anyone with whom you have a significant personal relationship presently involved in a lawsuit of any kind?
18. Have you or has any member of your family, a close friend, or anyone with whom you have a significant personal relationship had any special training in:
  - (i) Counseling/social work/social services
  - (ii) Automotive design
  - (iii) Automotive mechanics
  - (iv) Accident reconstruction
  - (v) Autonomous vehicle technology, including radar, camera, or lidar
  - (vi) Medicine
  - (vii) Software engineering/coding
  - (viii) Law

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19. Are there any of you who do not drive an automobile? If so, have you ever driven an automobile, and if you have, please explain your reasons for not presently driving
20. Do any of you have any religious or other deeply held moral belief that do not allow you to sit in judgment of others?
21. You may be called on in this case to award damages for personal injury, pain, and suffering. Do any of you have any religious or other belief that pain and suffering are not real or any belief that would prevent you from awarding damages for pain and suffering if liability for them is established?
22. Are there any of you who would not treat with or seek care from a medical doctor?
23. Have you or has any member of your family, a close friend, or anyone with whom you have a significant personal relationship ever engaged in investigating or otherwise acting on claims for damages?
24. Have you or they, to your knowledge, ever been in an accident with the result that a claim for personal injuries or for substantial property damage was made by someone involved in that accident, whether or not a lawsuit was filed?
25. Plaintiff Dillon Angulo is claiming injuries. Mr. Angulo claims he suffers from a traumatic brain injury and complex regional pain syndrome. Have you or has any member of your family, a close friend, or anyone with whom you have a significant personal relationship suffered from similar injuries?
26. Plaintiffs Guillermo and Liliana Benavides are claiming wrongful death damages for the loss of their daughter, Naibel Benavides. Have you or has any member of your family, a close friend, or anyone with whom you have a significant personal relationship suffered from the loss of a child?
27. One a scale from 1-5, with 1 being the least sympathetic and 5 being the most sympathetic, how would you rate yourself?
28. There will be evidence, including medical testimony and likely some photographs, of the deceased and Plaintiff Dillon Angulo. Will you be uncomfortable with unable to handle medical testimony, possibly including gruesome evidence and/or photographs?
29. The fact that the Plaintiffs went through this terrible experience will naturally cause you to feel sympathy for them or their loved ones. If you are instructed by the Court that you cannot base your decision in this case on sympathy, but instead must base it on the law and evidence, would you have difficulty following these instructions?

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