

**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.

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DILLON ANGULO,

Case No. 22-22607-KMM

Plaintiff,

v.

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

Defendant.

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**JOINT UPDATED TRIAL WITNESS LIST**

The Parties, jointly through their undersigned counsel, and in accordance with this Honorable Court's request and specifications as provided in the Calendar Call which took place on Tuesday, July 8, hereby provide this updated Trial Witness list, as follows:

**I. Plaintiffs' "Will Call" list**

<b>No.</b>	<b>Name</b>	<b>Scope of Testimony</b>	<b>Personal Background</b>	<b>If presented via deposition only, anticipated date</b>	<b>Time Estimate (Total)</b>
1.	Lilia Leon Jimenez	Fact Witness Damages	Ms. Leon is the mother and survivor of Naibel Benavides. She currently lives in New Jersey but still spends substantial time in Miami.	-	1.25
2.	Guillermo Benavides	Fact Witness Damages	Mr. Benavides is the father and survivor of Naibel Benavides. He currently lives in New Jersey,	-	1.25
3.	Neima Benavides	Fact Witness Damages	Mrs. Benavides is the sister of Naibel Benavides, and also serves as the personal representative for the Estate of Naibel Benavides and is one of the parties bringing this lawsuit. She currently lives in New Jersey.	-	1.25
4.	Dillon Angulo	Fact Witness Damages	Dillon Angulo was injured in this collision and is one of the parties bringing this lawsuit. He was raised in Miami Dade County and splits his time between his own home in the Florida Keys and his parents' home in Miami.	-	2.0
5.	Dawn Angulo	Fact Witness Damages	Mrs. Angulo is Dillon Angulo's mother. She lives with her husband Victor in Miami.	-	1.25
6.	Victor Angulo	Fact Witness Damages	Mr. Angulo is Dillon Angulo's father. He lives with his wife Dawn in Miami.	-	1.25
7.	George McGee	Fact Witness Liability	George McGee was the driver of the Tesla vehicle involved in this collision. He lives in Boca Raton	-	2.5
8.	Ret. Corp. David Riso	Fact Witness Liability	Retired Corp. David Riso was Florida Highway Patrol's lead traffic homicide investigator for this collision. He lives in Italy.	-	2.0
9.	Akshay Phatak	Fact Witness Liability	Akshay Phatak is an Engineering Manager at Tesla and serves as one	<b>Tuesday 7/15</b>	1.25

No.	Name	Scope of Testimony	Personal Background	If presented via deposition only, anticipated date	Time Estimate (Total)
		(Tesla Corp Rep)	of Tesla's Designated Corporate representatives in this case. Mr. Phatak lives in California.		
10.	Eloy Rubio Blanco	Fact Witness Liability (Tesla Corp Rep)	Eloy Rubio Blanco is a Staff Product Support Engineer at Tesla, and serves as one of Tesla's Designated Corporate Representatives in this case. Mr. Rubio lives in Spain.	<b>Friday 7/18 and/or Monday 7/21</b>	2.0
11.	David Shoemaker	Fact Witness -Liability	David Shoemaker is a software engineer and data specialist employed by Tesla in their Autopilot Telemetry team. Mr. Showmaker lives in California.	<b>Friday 7/18</b>	1.0
12.	Michael Calafell	Fact Witness Liability	Michael Calafell is Tesla Field Technical Specialist. Miami. Mr. Calafell lives in Miami.	-	.75
13.	Alan Moore	Expert Liability	Alan Moore is a mechanical and forensic engineer and accident reconstructionist and the principal of A.B. Moore Forensic Engineering. He currently lives in the Orlando area.	-	4.0
14.	Mary "Missy" Cummings, Ph.D.	Expert Liability	Dr. Cummings is a professor and director of the Autonomy and Robotics Center at George Mason University. Dr. Cummings lives in Virginia.	-	6.5
15.	Mendel Singer, Ph.D.	Expert Liability	Dr. Mendel E. Singer, is an Associate Professor and Vice Chair for Education in the Department of Population & Quantitative Health Sciences at Case Western Reserve University School of Medicine, and Director of Research for the university's Jewish Community Health Initiative. Dr. Singer resides in Ohio.	-	2.2

No.	Name	Scope of Testimony	Personal Background	If presented via deposition only, anticipated date	Time Estimate (Total)
16.	Jason Lewis, Ph.D.	Expert Liability	Dr. Jason Lewis is a forensic data specialists. Dr. Lewis resides in Tampa.	-	1.5
17.	Jonathan Saldana	Treating EMS personnel	Fire Lieutenant Jonathan Saldana is a firefighter – paramedic who works for Ocean Reef. Mr. Saldana lives in Homestead.	-	.75
18.	Dr. Louis Pizano	Treating physician	Dr. Louis Pizano is a trauma and critical care surgeon at Jackson Memorial’s Ryder Trauma Center He was Dillon Angulo’s attending critical care and trauma physician at Jackson Hospital.	<b>Monday 7/21</b>	1.0
19.	William “Bill” Reader	Treating physical therapist	Bill Reader is a physical therapist specializing in chronic pain rehabilitation. He works for Elite Physical Therapy in Miami.	-	1.0
20.	Dr. Danielle Horn	Treating physician	Dr. Danielle Bodzin Hornis an Assistant Professor of Clinical Anesthesiology at the University of Miami Miller School of Medicine and the Program Director of the Interventional Pain Medicine Fellowship at Jackson Memorial Hospital. Dr. Horn serves as Dillon Angulo’s interventional pain management physician.	-	1.5
21.	Dr. Kester Nedd	Expert Damages	Dr. Kester J. Nedd is a neurologist and neurological rehabilitation specialist based in Miami Lakes, Florida. He currently practices at the Design Neuroscience Center, serves as a voluntary associate professor of neurology at the University of Miami Miller School of Medicine.	-	1.5

No.	Name	Scope of Testimony	Personal Background	If presented via deposition only, anticipated date	Time Estimate (Total)
22.	Dr. Sally Russell Kolitz	Expert Damages	Dr. Sally Russell, Ph.D., is a neuropsychologist. Dr. Russell resides in Miami.	-	1.5
23.	Dr. Carlos Placencia	Treating psychologist	Dr. Carlos E. Placencia, is a licensed Mental Health Counselor. His practice is located in Pembroke Pines.	-	1.5
24.	Monica Snyder	Treating therapist	Monica Snyder, is a licensed Marriage and Family Therapist based in Miami, Florida.	-	1.5
25.	Dr. Craig Lichtblau	Expert Damages	Dr. Craig H. Lichtblau, MD is a Physical Medicine and Rehabilitation (Physiatry) based in North Palm Beach, Florida.	-	1.5

## II. Plaintiffs' "May Call" list

No.	Name	Scope of Testimony	Personal Background	If presented via deposition only, anticipated date	Time Estimate (Total)
1.	Robert Sumwalt	Fact Witness Liability	Robert Sumwalt III was a former board member of the National Transportation Safety Board Mr. Sumwalt resides in Virginia.	-	1.75

**III. Tesla's "Will Call" list**

<b>No.</b>	<b>Name</b>	<b>Scope of Testimony</b>	<b>Personal Background</b>	<b>If presented via deposition only, anticipated date</b>	<b>Time Estimate (Total)</b>
1.	Eloy Rubio Blanco	Tesla corporate representative	Eloy Rubio Blanco is a Tesla Staff Product Support Engineer at Tesla, and serves as one of Tesla's Designated Corporate Representatives in this case. Mr. Rubio lives in Spain.	-	4.0
2.	David Cades, Ph.D.	Expert Liability	Dr. David Cades is a Practice Director and Principal Scientist at Exponent. Dr. Cades resides in Illinois.	-	4.3
3.	Ryan Harrington	Expert Liability	Ryan Harrington is a mechanical and automotive engineer and the Corporate Vice President and Principal at Exponent. Mr. Harrington resides in Massachusetts	-	4.3
4.	James Walker	Expert Liability	James Walker, Jr. is a mechanical and accident reconstructionist and with Carr Engineering, Inc. Mr. Walker currently resides in Houston, Texas.	-	3.6
5.	Officer Joel M. Torres <sup>1</sup>	Fact witness	Joel Torres is a former officer with the Monroe County Sheriff's Office. Officer Torres was the first officer on the scene of the accident He owns a Greek Food Truck in the Keys and also is a part time instructor for the College of the Keys. He currently resides in Key Largo.	-	1.6

<sup>1</sup> Former Office Torres will not be called to testify if the parties are able to agree on the admission of Officer Torres' body cam footage.

**IV. Tesla's "May Call" list**

<b>No.</b>	<b>Name</b>	<b>Scope of Testimony</b>	<b>Personal Background</b>	<b>If presented via deposition only, anticipated date</b>	<b>Time Estimate (Total)</b>
1.	Barry Crown, M.D.	Tesla Expert	Dr. Barry Crown is a licensed psychologist and clinical neuropsychologist in Miami, Florida. He resides in Pensacola, Florida.	-	2.3
2.	Alejandro Del Rio	Fact Witness - Paramedic	Mr. Del Rio is a paramedic/first responder with Ocean Reef Fire Department in Key Largo, Florida. It is believed that Mr. Del Rio resides in Homestead.	-	0.9
3.	Rafael Fernandez, Jr., M.D.	Tesla Expert	Dr. Fernandez is an orthopedic surgeon. He is currently employed at Fernandez Orthopedics, PA. in Coral Gables, Florida. He is affiliated with multiple local hospitals including Baptist Doctors Hospital and Baptist Health South Miami Hospital.	-	2.3
4.	David Hulse	Fact witness - Paramedic	David Hulse is a Supervisor-Paramedic/first responder with Ocean Reef Fire Department in Key Largo, Florida.	-	0.9
5.	Bruce Kohrman, M.D.	Tesla Expert	Dr. Bruce Kohrman is a neurologist at South Miami Neurology, LLC and Utah Orthopedic Spine and Injury Center. He is affiliated with South Miami Hospital and Doctors Hospital.	-	2.3
6.	Trooper Odel Mosquera	Fact Witness - FHP	Former Trooper Odel Mosquera was employed with the Florida Highway Patrol. It is unknown where he currently resides.	-	0.9
7.	Chris Payne	Tesla Employee	Chris Payne is Tesla Autopilot Engineer. He currently resides in California.	-	2.3
8.	Oscar Pinzon	Fact Witness - Paramedic	Oscar Pinzon is a paramedic with Key Largo Rescue. Mr. Pinzon lives in Miami.	-	0.9

No.	Name	Scope of Testimony	Personal Background	If presented via deposition only, anticipated date	Time Estimate (Total)
9.	Corp. Carlos Rosario-Flores	Fact Witness – Former FHP	Carlos Rosario-Flores is a former Traffic Homicide Investigator with the Florida Highway Patrol Since 2021, he has been a School Resource Officer for the Miami-Dade Schools Police Department.	-	2.3
10.	Karen Elizabeth Saldina Santibanez	Fact Witness – scene witness	At the time of the accident, Karen Elizabeth Saldina Santibanez was the lead supervisor at the Beach Bar in Ocean Reef in Key Largo. Ms. Sandina resides in Homestead.	-	0.9
11.	David Shoemaker	Tesla Employee	David Shoemaker is a Tesla Autopilot Manager. He resides in California.	-	2.3