

**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.

JURY VERDICT FORM

We, the jury, return the following verdict:

1. Did Tesla place the 2019 Model S on the market with a defect which was a legal cause of damage to Naibel Benavides Leon and Dillon Angulo?

YES _____ NO _____

If your answer to Question 1, is No, your verdict is for Tesla and you should skip the remaining questions and sign the verdict form. If your answer is YES, proceed to Question 2.

2. Was there negligence on the part of George McGee, which was a legal cause of damage to Naibel Benavides Leon and Dillon Angulo?

YES _____ NO _____

If your answer to Question 2 is YES, please answer Question 3. If your answer to Question 2 is NO, skip Question 3 and proceed to Question 4.

3. State the percentage of any responsibility which was a legal cause of damage to Naibel Benavides Leon and Dillon Angulo that you apportion to:

Tesla _____ %

George McGee _____ %

Total Must Equal 100%

DAMAGES

In determining the amount of damages, do not make any reduction because of the negligence, if any, of George McGee. If you find that George McGee was to any extent negligent, the court in entering judgment will make an appropriate reduction in the damages awarded.

DAMAGES FOR THE DEATH OF NAIBEL BENAVIDES LEON

4. What is the total amount of damages sustained by Lilia Marilyn Leon for her pain and suffering as a result of the death of her daughter, Naibel Benavides Leon?

\$ _____

5. What is the total amount of damages sustained by Guillermo Benavides for his pain and suffering, as a result of the death of his daughter, Naibel Benavides Leon?

\$ _____

DAMAGES FOR DILLON ANGULO

6. What is the total amount of Dillon Angulo’s damages for pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, and loss of capacity for the enjoyment of life sustained in the past and to be sustained in the future:

- a. Past? \$ _____
- b. Future? \$ _____

PUNITIVE DAMAGES

7. If you answered YES to Question 1, state whether under the circumstances of this case, you find by clear and convincing evidence that punitive damages are warranted against Tesla.

YES _____ NO _____

If you answered NO to Questions 7, then you should skip the remaining questions and sign and date the verdict form. If you answered YES to Question 7, please answer Question 8.

8. What is the total amount of punitive damages, if any, which you find, by clear and convincing evidence, should be assessed against Tesla?

\$ _____

If you elect not to assess punitive damages against Tesla, you should enter a zero (0) as the amount of damages.

Please sign and date the verdict form.

SO SAY WE ALL on _____, 2025.

FOREPERSON

