

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

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

Plaintiff,

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

v.

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

Defendant.

DILLON ANGULO,

Plaintiff,

Case No. 22-22607-BB

v.

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

Defendant.

NOTICE OF APPEAL

Defendant TESLA, INC. appeals to the United States Court of Appeals for the Eleventh Circuit from this Court's final judgment entered on August 4, 2025 (Dkt. 538), all orders that merge into that judgment, *see* Fed. R. App. P. 3(c)(4), and this Court's order denying Defendant's Amended Renewed Motion for Judgment as a Matter of Law or, Alternatively, Motion for a New Trial or to Amend the Judgment entered on February 20, 2026 (Dkt. 612).

Date: March 16, 2026

Respectfully submitted,

THEODORE J. BOUTROUS, JR.
(admitted *pro hac vice*)
JULIAN W. POON (admitted *pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071
Tel. (213) 229-7000
tboutrous@gibsondunn.com
jpoon@gibsondunn.com

/s/Wendy F. Lumish

WENDY F. LUMISH
Florida Bar No. 334332
BOWMAN AND BROOKE LLP
Two Alhambra Plaza, Suite 800
Coral Gables, FL 33134
Tel. 305-995-5600 / Fax: 305-995-6100
wendy.lumish@bowmanandbrooke.com

MIGUEL A. ESTRADA (admitted *pro hac vice*)
THOMAS H. DUPREE, JR. (admitted *pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1700 M Street, N.W.
Washington, D.C. 20036
Tel. (202) 955-8500
mestrada@gibsondunn.com
tdupree@gibsondunn.com

PAUL D. CLEMENT (admitted *pro hac vice*)
CLEMENT & MURPHY, PLLC
706 Duke Street
Alexandria, VA 22314
Tel. (202) 742-8900
paulclement@clementmurphy.com

THOMAS P. BRANIGAN (admitted *pro hac vice*)
DREW P. BRANIGAN (admitted *pro hac vice*)
BOWMAN AND BROOKE LLP
101 W. Big Beaver Road, Suite 1100
Troy, MI 48084
Tel. 248-205-3300 / Fax: 248-205-3399
thomas.branigan@bowmanandbrooke.com
drew.branigan@bowmanandbrooke.com

WHITNEY V. CRUZ
Florida Bar No. 800821
BOWMAN AND BROOKE LLP
Two Alhambra Plaza, Suite 800
Coral Gables, FL 33134
Tel. 305-995-5600 / Fax: 305-995-6100
whitney.cruz@bowmanandbrooke.com

JOEL SMITH (admitted *pro hac vice*)
BOWMAN AND BROOKE LLP
1441 Main Street, Suite 1200
Columbia, SC 2920
Tel. 803-726-7420 / Fax: 803.726.7421
Joel.Smith@bowmanandbrooke.com

Attorneys for Defendant Tesla, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2026, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Adam T. Boumel, Esq.
THE ROUSSO, BOUMEL LAW FIRM, PLLC
9350 South Dixie Highway
Suite 1520
Miami, FL 33156
Tel. 305-670-6669
adam@roussolawfirm.com
haiyang@roussolawfirm.com
pleadings@roussolawfirm.com

Counsel for Plaintiff Dillon Angulo

Brett Schreiber, Esq.
Admitted *Pro Hac Vice*)
Satyarinivas "Srinivas" Hanumadass, Esq.
Admitted *Pro Hac Vice*
Carmela Birnbaum, Esq.
Admitted *Pro Hac Vice*
SINGLETON SCHRIEBER
591 Camino de la Reina, Suite 1025
San Diego, CA 92108
bschreiber@singletonschreiber.com
vas@singletonschreiber.com
cbirnbaum@singletonschreiber.com
jjusto@singletonschreiber.com
eelms@singletonschreiber.com
service@singletonschreiber.com

Co-Counsel for Plaintiffs Dillon Angulo and Neima Benavides

Todd Poses, Esq.
POSES & POSES, P.A.
Alfred I. Dupont Building
169 East Flagler Street, Suite 1600
Miami, FL 33131
Tel. 305-577-0200
Fax: 305-371-3550
tposes@posesandposes.com
maria@posesandposes.com

Counsel for Plaintiff Neima Benavides

Douglas F. Eaton, Esq.
EATON & WOLK PL
2665 South Bayshore Drive, Suite 609
Miami, FL 33133
Tel. 305-249-1640
Fax: 786-350-3079
deaton@eatonwolk.com
cgarcia@eatonwolk.com
lhuete@eatonwolk.com

Co-Counsel for Plaintiffs Dillon Angulo and Neima Benavides

/s/Wendy F. Lumish

WENDY F. LUMISH