

No. 26-10858

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

NEIMA BENAVIDES, et al.,
Plaintiffs-Appellees,

v.

TESLA, INC.,
Defendant-Appellant.

On Appeal from the U.S. District Court
for the Southern District of Florida
(Case No. 21-cv-21940 – Judge Beth Bloom)

**BRIEF OF WASHINGTON LEGAL FOUNDATION
AS AMICUS CURIAE SUPPORTING
DEFENDANT-APPELLANT AND REVERSAL**

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July 9, 2026

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Benavides v. Tesla, Inc.,
No. 26-10858

**CERTIFICATE OF INTERESTED PERSONS AND
CORPORATE DISCLOSURE STATEMENT**

Under 11th Cir. R. 26.1-1, Washington Legal Foundation (WLF) certifies that the following persons and entities were omitted from the Certificates filed by the parties:

- (1) Washington Legal Foundation (amicus curiae)
- (2) Jerome P. DeSanto, Jr. (counsel for amicus curiae)
- (3) Cory L. Andrews (counsel for amicus curiae)

Under Fed. R. App. P. 26.1, WLF states that it is a nonprofit, tax-exempt corporation under § 501(c)(3) of the Internal Revenue Code; it has no parent corporation, issues no stock, and no publicly held company enjoys a 10% or greater ownership interest.

Date: July 9, 2026

/s/ Jerome P. DeSanto, Jr.
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IDENTITY AND INTEREST OF AMICUS CURIAE*

Washington Legal Foundation is a national, non-profit public-interest law firm and policy center dedicated to free enterprise, individual rights, limited government, and the rule of law. WLF frequently appears as amicus curiae to highlight statutory and constitutional limits on punitive damages to prevent arbitrary deprivations of property. *See, e.g., Coates v. R.J. Reynolds Tobacco Co.*, 375 So. 3d 168 (Fla. 2023); *Philip Morris USA v. Williams*, 549 U.S. 346 (2007); *State Farm Mut. Auto. Ins. Co. v. Campbell*, 538 U.S. 408 (2003).

Through its Legal Studies Division, WLF has produced substantial scholarship on punitive damages and the due-process limits on such awards. *See, e.g.,* Victor E. Schwartz, *Punitive Damages Awards: The Rest of the Story* (WLF Legal Backgrounder, Nov. 4, 2011); Curt Cutting, *An Emerging Trend? Federal Appeals Court Limits Punitive Damages to 1:1 Ratio*, (WLF Legal Opinion Letter, Feb. 27, 2009).

* No party's counsel authored any part of this brief. No one, apart from WLF and its counsel, contributed money intended to fund the brief's preparation or submission. All parties have consented to the filing of this brief.

WLF has an interest in ensuring that these limits on punitive damages are respected and enforced to keep the law from discouraging technological innovation. WLF submits this brief solely on the issue of punitive damages.

STATEMENT OF THE ISSUE

Whether punitive damages are available in a strict products liability case where a car maker complied with industry standards and a third party bears primary fault for the accident.

INTRODUCTION AND SUMMARY OF ARGUMENT

This is not a punitive damages case. Punitive damages are reserved for egregious misconduct approaching criminality. This case involves nothing of the sort. It instead presents an industry-compliant manufacturer, a user who disregarded multiple warnings, and a jury that found a third party primarily at fault. No Florida court, nor this Court, has approved punitive damages under remotely similar circumstances.

Tesla's 2019 Model S is equipped with "Autopilot." Autopilot is a driver-assistance technology with advanced safety features, including traffic-aware cruise control, forward-collision warning, automatic

emergency braking, and lane-centering assistance. Doc. 428 at 5-6.* Tesla has repeatedly warned drivers that Autopilot, which was state-of-the-art at the time of the subject accident, does not replace attentive driving. *Id.* at 6-7. But the driver here ignored those warnings. He admitted to looking down, reaching for his phone, speeding, and disregarding traffic signals at the time of the accident. *Id.* at 4-5, 8. The jury found him primarily responsible for Plaintiffs' harm, assigning him 67% of the fault. Doc. 534 at 2.

Even assuming that Tesla can be held liable at all, imposing punitive damages against a car maker under these circumstances conflicts with Florida law, the Due Process Clause, and *Tesla, Inc. v. Banner*, 411 So. 3d 1 (Fla. 4th DCA 2025)—a recent Florida appellate decision that rejects punitive damages on materially similar facts. Punitive damages are unavailable in strict-liability cases where (1) the manufacturer complies with industry standards; (2) the manufacturer undertakes efforts to mitigate product safety risks; or (3) a third party bears primary responsibility for the injury. All three conditions are

* Citations to the lower court record reference the page numbers that appear in the header generated by the lower court's electronic filing system.

present here.

Not only are punitive damages against Tesla invalid as a matter of law, but the \$200 million punitive award is unlawfully excessive. It exceeds Florida's statutory cap and violates constitutional ratio limits. If allowed to stand, the ruling below would dramatically expand punitive exposure in product-liability cases. It would also discourage the development of car-safety technologies at a time when advances in those technologies are making the roads safer. Nobody wants that.

This is not a case to stretch the limits of punitive liability. It is a case to enforce doctrinal boundaries. The Court should reverse the punitive damages award in full or, at a minimum, vacate and remand for entry of a constitutionally permissible award.

ARGUMENT

I. PUNITIVE DAMAGES AGAINST TESLA ARE UNAVAILABLE AS A MATTER OF LAW.

Affirming punitive damages here would improperly expand punitive liability where restraint is most warranted. Neither Florida law nor this Court has ever permitted punitive damages in a strict-liability case where evidence shows compliance with industry standards, steps to

mitigate safety risks, and third-party misconduct that led to the plaintiff's injury. Yet that is precisely this case.

A. Florida courts have “all but eliminated” punitive damages in car-defect cases.

It “remains largely true today,” that Florida courts have “all but eliminated” punitive damages in strict liability, car-defect cases. *Banner*, 411 So. 3d at 5 (internal quotes and citations omitted); *Jeep Corp. v. Walker*, 528 So. 2d 1203, 1205-06 (Fla. 4th DCA 1988) (no punitive damages where plaintiff accused Jeep of “continuing . . . to market a vehicle with a high propensity to roll over”); *Chrysler Corp. v. Wolmer*, 499 So. 2d 823, 825-26 (Fla. 1986) (no punitive damages where plaintiffs accused Chrysler of defects in its fuel tank design). This result is not happenstance. It is a logical extension of the inherent tension between punitive damages and strict liability.

“[P]unitive damages are not awarded to a plaintiff for compensation of his . . . injury.” *Hoever v. Marks*, 993 F.3d 1353, 1360 (11th Cir. 2021). They are imposed to punish wrongdoing. *Id.* To recover punitive damages, a plaintiff must show that the defendant has not only been at fault, but at grievous fault. *Bistline v. Rogers*, 215 So. 3d 607, 611 (Fla. 4th DCA 2017) (reserving punitive damages “for particular types of

behavior which go beyond mere intentional acts”). Florida requires “clear and convincing evidence” that the defendant engaged in “intentional misconduct” or “gross negligence”—conduct comparable to “criminal manslaughter.” See Fla. Stat. § 768.72(2); *Valladares v. Bank of Am. Corp.*, 197 So. 3d 1, 11 (Fla. 2016) (explaining that in negligence cases, the level of negligence required “is equivalent to the conduct involved in criminal manslaughter”).

The Fourteenth Amendment’s Due Process Clause similarly permits punitive damages for conduct only if it is sufficiently “reprehensible” to justify punishment beyond compensatory damages. See U.S. Const. amend. XIV; *State Farm Mut. Auto. Ins. Co. v. Campbell*, 538 U.S. 408, 419 (2003). That means “outrageous” misconduct arising from the defendant’s mental state. Restatement (Second) of Torts § 908 (1979).

Strict liability, in stark contrast, dispenses with fault altogether. It requires no showing of negligence or intent but instead turns on the condition of the product entering the stream of commerce. See *Ferayorni v. Hyundai Motor Co.*, 711 So. 2d 1167, 1170-71 (Fla. 4th DCA 1998) (“[I]t is unnecessary in a strict liability action to show that the manufacturer

has been negligent in any way”) (internal quotes and citations omitted). The policy behind strict liability is that a manufacturer must sometimes be held liable even if *not at fault*. *Id.* at 1172 (explaining the policy is to “facilitate a plaintiff’s recovery where a manufacturer places” a “potentially dangerous product” on the market).

Despite the inherent tension between the two doctrines—one requires grievous fault, the other none at all—Florida courts have sometimes permitted punitive damages in strict-liability cases. But in doing so, there is always a risk that a jury will punish for faultless or mere negligent conduct—exactly what Florida law and the Due Process Clause forbid. *See, e.g., State Farm*, 538 U.S. at 419. This risk underscores the need for careful restraint when considering punitive damages in strict-liability contexts. Any punitive award, therefore, must independently rest on clear and convincing proof of “outrageous,” injury-causing misconduct, not mere product defect. *Mirlada v. Mitchell*, 429 So. 3d 1113, 1119 (Fla. 6th DCA 2026) (explaining that punitive damages must be grounded in “outrageous” conduct that causes a plaintiff’s injury).

In today’s automotive landscape, federal policy has pushed manufacturers to incorporate advanced safety technologies—such as lane centering assistance, forward-collision warnings, and automatic emergency braking—into modern vehicles. *See* U.S. Dep’t of Transp., Nat’l Highway Traffic Safety Admin., *Automated Driving Systems 2.0: A Vision for Safety*, DOT HS 812 442 at iii (Sept. 2017) (explaining the federal government’s “leadership role in encouraging the safe introduction of automated vehicle technologies”). As a result, it is exceedingly rare for any vehicle to enter the market with “reckless disregard for human life” approaching criminal “manslaughter.” *Jeep Corp.*, 528 So. 2d at 1206. As recognized in *Banner*, *Jeep Corp.*, and *Wolmer*, such “outrageous” conduct is almost unheard of today. Indeed, the adoption of these technologies reflects a genuine *regard* for human life. This case is no different.

B. This case is nowhere near the rare car-defect case that warrants punitive damages.

This case was tried exclusively on strict-liability theories and thus requires careful reconsideration of any punitive award. The jury delivered no specific findings of fact on Tesla’s moral culpability. The punitive award warrants exacting appellate review. *See Cooper Indus.*,

Inc. v. Leatherman Tool Grp., Inc., 532 U.S. 424, 436-37 (2001) (explaining that the “jury’s award of punitive damages does not constitute a finding of ‘fact,’” and that such awards are subject to *de novo* review).

The court below breached three doctrinal boundaries in awarding punitive damages against Tesla. Each boundary independently—but most certainly collectively—places this case outside those fact patterns where punitive damages may be imposed. The Court should reinforce the following doctrinal limits to avoid future arbitrary and unpredictable punitive awards.

Boundary 1: Punitive damages are unwarranted where a manufacturer complied with industry standards. Substantial evidence shows that Autopilot was state-of-the-art and complied with prevailing industry standards, including those of the Society of Automotive Engineers, which have been endorsed by the National Highway Traffic Safety Administration. *See* Doc. 591 at 21-29; *see also Banner*, 411 So. 3d at 4 (“evidence indicates that Tesla’s Autopilot features were ‘state-of-the-art’ and complied with all industry and regulatory standards”).

This compliance belies the kind of “intentional misconduct” or “gross negligence” required for punitive damages. In *Am. Cyanamid Co. v. Roy*, 498 So. 2d 859 (Fla. 1986), the Florida Supreme Court quashed a punitive award where a drug manufacturer “compl[ied] with industry guidelines” because such compliance shows consideration of safety. *Id.* at 862-63. A manufacturer that conforms its conduct to governing standards cannot, absent extraordinary circumstances, be said to act with “wanton disregard for the safety of” others. *Id.*; *see also Richards v. Michelin Tire Corp.*, 21 F.3d 1048, 1059 (11th Cir. 1994) (punitive damages unavailable in Alabama case where “compliance with both federal regulations and industry practice” demonstrated “evidence of due care”); *Davis v. Little Giant Ladder Sys., LLC*, No. 2:19-cv-780-SPC-NPM, 2022 WL 657062, at *9 (M.D. Fla. 2022) (explaining that compliance with industry standards “controverts punitive damages” even if not dispositive alone).

Boundary 2: Punitive damages are unwarranted where a manufacturer takes steps to mitigate safety risks. Substantial evidence also shows that Tesla undertook efforts to reduce risks associated with driver misuse of Autopilot, including continuous refinement of warnings and safety features. *See* Doc. 591 at 47-48 (summarizing evidence of the

same); Doc. 603 at 19-20. Tesla conducted studies on driver engagement when using Autopilot; introduced product enhancements to mitigate driver misuse; and used safety data to continuously improve the system. *Id.* In *Wolmer*, the Florida Supreme Court explained that Chrysler did not act with “wanton disregard for life equivalent to manslaughter” where it had tested, modified, and corrected certain issues with the car model to improve safety. *Wolmer*, 499 So. 2d at 826.

Punitive damages are not warranted against defendants who have taken steps to mitigate safety risks, even if, as this Circuit has recognized, there is a “bona fide dispute” as to the sufficiency of their actions. *Ivy v. Ford Motor Co.*, 646 F.3d 769, 777 (11th Cir. 2011) (applying Georgia caselaw); *see also McHale v. Crown Equip. Corp.*, No. 8:19-cv-707-T-27SPF, 2021 WL 808860, at *6 (M.D. Fla. Mar. 3, 2021) (punitive damages against forklift manufacturer “not warranted,” despite “the possibility that an alternative design might prevent some injuries,” where defendant took “actions to evaluate and reduce the risk of . . . injuries”).

Boundary 3: Punitive damages are unwarranted where a third party is primarily responsible for the injury. Here, the jury found the driver

primarily responsible for the accident, assigning him 67% of the fault. Doc. 534 at 2. His reckless driving is undisputed: he admitted he was distracted, reaching for his phone, and ignoring traffic signs. He also admitted that he was ultimately responsible for controlling the vehicle. Doc. 428 at 4-5, 8. Whether Tesla has any liability under these circumstances is doubtful, but due process surely does not permit punishment of Tesla for another's misconduct. *See State Farm*, 538 U.S. at 419 (explaining that punitive damages should be awarded for only "the defendant's culpability").

Florida law confirms this point: a third party's reckless misuse of a product breaks the causal chain for strict liability, much less supports punitive damages. *See DZE Corp. v. Vickers*, 299 So. 3d 538, 540-41 (Fla. 1st DCA 2020) (no liability against drug maker for car accident where third-party driver who voluntarily misused drug caused the accident); *Cohen v. Gen. Motors Corp., Cadillac Div.*, 427 So. 2d 389, 390-91 (Fla. 4th DCA 1984) (no liability against General Motors for accident where plaintiff misused the manual brake causing "the car to roll, injuring [the plaintiff]").

Plaintiffs assert that Autopilot induces drivers into reckless driving, but that does not save the punitive award. Courts have repeatedly rejected efforts to transform product makers into guarantors against reckless drivers: drivers bear responsibility for their decisions behind the wheel. *See, e.g., Meador v. Apple Inc.*, 911 F.3d 260, 265-66 (5th Cir. 2018) (no liability against Apple where plaintiffs argued that cell phone induced distracted driving); *Durkee v. C.H. Robinson Worldwide, Inc.*, 765 F. Supp. 2d 742, 749-50 (W.D.N.C. 2011) (no liability against maker of in-truck texting system, where plaintiffs alleged the system distracted a driver resulting in an accident); *Schemel v. Gen. Motors Corp.*, 384 F.2d 802, 805 (7th Cir. 1967) *overruled in part on other grounds by Huff v. White Motor Corp.*, 565 F.2d 104 (7th Cir. 1977) (no liability against GM where plaintiff alleged that advertising the speed of the vehicle prompted reckless driving). Plaintiffs' theory fails as a matter of law.

Plaintiffs have not identified—and no Florida court has ever recognized—a case imposing punitive damages under comparable

circumstances. The lack of similar caselaw is not incidental; it aligns with settled limits on punitive liability.

Banner confirms this conclusion. There, the court rejected punitive damages where Autopilot was state-of-the-art, Tesla complied with applicable standards, drivers were warned to remain attentive, and no evidence showed that Tesla knew the system was likely to cause death. *Banner*, 411 So. 3d at 5. The district court's effort to distinguish *Banner* as a pleading-stage case fails because the plaintiff sought punitive damages only *after* discovery was complete. See Initial Br. of Appellant, *Tesla, Inc. v. Banner*, 2024 WL 304945, at *19-20 (Jan. 16, 2024).

All doctrinal roads lead to the same conclusion. This case lies well beyond the outer bounds of where punitive damages may be warranted. The award cannot stand as a matter of law.

II. THE \$200 MILLION PUNITIVE AWARD EXCEEDS BOTH STATUTORY AND CONSTITUTIONAL CEILINGS.

But even if that's all wrong, the \$200 million award still cannot stand. The award fails twice over for exceeding established limits—first under Florida's statutory cap and independently under the Constitution's ratio limits.

A. The award exceeds Florida’s statutory cap.

Florida law caps punitive damages at *three times* compensatory damages, unless the defendant acted solely for “unreasonable financial gain” and knowingly engaged in “unreasonably dangerous” conduct. *See* Fla. Stat. § 768.73(b). Plaintiffs affirmatively waived this exception at a hearing, so they cannot raise it now on appeal. *See* Doc. 586 at 214:22-15:4; *see also* *Access Now, Inc. v. Sw. Airlines Co.*, 385 F.3d 1324, 1331 (11th Cir. 2004). Tesla’s compensatory liability is \$42,570,000, so the statutory punitive maximum is \$127,710,000. The \$200 million award far exceeds that cap.

Plaintiffs argue the denominator should be the gross damages figure (\$129 million), not Tesla’s post-apportionment compensatory liability. But *Coates v. R.J. Reynolds Tobacco Co.*, 375 So. 3d 168 (Fla. 2023) effectively forecloses that position. There, the Florida Supreme Court rejected the same argument and used the post-apportionment compensatory award as the denominator in determining punitive damages. *Id.* at 173, 176. Plaintiffs’ theory is also unsound because it would improperly punish Tesla for the driver’s 67% share of fault. *See State Farm*, 538 U.S. at 425 (the “precise award” of punitive damages

must be based on “the facts and circumstances of the *defendant’s conduct* and the harm to the plaintiff”) (emphasis added); *Clark v. Chrysler Corp.*, 436 F.3d 594, 606 n.16 (6th Cir. 2006) (“[A] ratio based on the full compensatory award would improperly punish [the defendant] for conduct” other than his own).

B. Due process permits no more than a 1:1 ratio here.

The Due Process Clause independently forbids “grossly excessive” punitive awards and looks principally to the ratio between punitive and compensatory damages. *BMW of N. Am., Inc. v. Gore*, 517 U.S. 559, 574, 580 (1996). Where compensatory damages are substantial, the Fourteenth Amendment permits only a modest ratio—“perhaps only equal to compensatory damages.” *State Farm*, 538 U.S. at 425.

The Supreme Court reinforced this principle in *Exxon Shipping Co. v. Baker*, 554 U.S. 471 (2008), describing a 1:1 ratio as a “fair upper limit.” 554 U.S. at 513 & n.27. Although *Exxon* was decided in the maritime context, the 1:1 ratio was derived from nationwide punitive damages cases—not maritime-specific cases. *See id.* at 512-13.

Federal appeals courts have repeatedly applied the 1:1 limit in non-maritime cases where the conduct at issue is not heinous and

compensatory damages are substantial. *See, e.g., Saccameno v. U.S. Bank Nat'l Ass'n*, 943 F.3d 1071, 1090 (7th Cir. 2019); *Lompe v. Sunridge Partners, LLC*, 818 F.3d 1041, 1073-75 (10th Cir. 2016); *Morgan v. N.Y. Life Ins. Co.*, 559 F.3d 425, 443 (6th Cir. 2009); *Jurinko v. Med. Protective Co.*, 305 F. App'x 13, 30 (3d Cir. 2008); *Boerner v. Brown & Williamson Tobacco Co.*, 394 F.3d 594, 602-03 (8th Cir. 2005).

That principle controls here. The lower court awarded a substantial sum of \$42,570,000 in compensatory damages from Tesla. And for the reasons set forth at Section I *supra*, Tesla's conduct in this case is paradigmatically non-heinous. Any punitive award above compensatory damages renders the \$200 million award indefensible.

III. EXPANDING PUNITIVE LIABILITY THROUGH THIS CASE WILL UNDERMINE AUTO INNOVATION AND PUBLIC SAFETY.

This case presents more than just an isolated dispute between the parties. It presents questions of whether punitive liability should be expanded in ways that would deter the development of automotive safety technologies. The stakes are high, and the consequences are significant.

Autopilot is a state-of-the-art driver assistance system designed to enhance—rather than replace—driver safety. Technologies like Autopilot are now widely deployed across the automotive industry. *See What Is*

Level 2 ADAS? Understanding the Next Step in Driving Assistance, CARADAS (July 3, 2025), <https://perma.cc/2F27-8CQE>. These technologies are proven to reduce accidents and improve roadway safety. A recent article by the National Safety Council concludes that “Advanced Driver Assistance Systems” are “associated with decreases in crashes and insurance claim rates.” National Safety Council, *Advanced Driver Assistance Systems*, NSC Injury Facts (2025), bit.ly/3RoxKeb (summarizing data from the Insurance Institute for Highway Safety, July 2025). And in 2017, NHTSA found that human error is “the major factor in 94 percent of all fatal crashes.” *Automated Driving Systems 2.0* at i. That same report also explains that the Federal Government seeks to avoid “imped[ing] progress with unnecessary or unintended barriers to innovation” because “automated vehicle technologies . . . have the potential to dramatically reduce the loss of life each day in roadway crashes.” *Id.* at ii.

But affirming the lower court’s punitive award would generate widespread uncertainty over legal risks for new driver-assistance technologies. This uncertainty would arise at a time when the safety benefits of these technologies are being recognized and implemented

throughout the automotive industry. If the boundaries limiting punitive damages are relaxed, and punitive damages are imposed on Tesla—despite its compliance with industry standards, its efforts to mitigate risks, and the fact that the accident was caused by reckless driving—the precedent would invite punitive damages in countless other situations. Manufacturers would face the threat of punitive liability even when they act responsibly, undermining their incentive to innovate and advance vehicle safety.

Plaintiffs’ theory—that Autopilot induces reckless driving—exacerbates these risks. If adopted, it would mean that any safety innovation could subject its manufacturer to punitive damages simply because some users might become less cautious as a result. This logic could extend to virtually every automotive safety advancement, such as collision-avoidance systems, seatbelts, and airbags—each of which could arguably alter driver behavior. Under the threat of punitive liability, the theory could be used to treat manufacturers as absolute insurers against all foreseeable misuse of their products, a result that the law has consistently rejected. *See, e.g., Ferayorni*, 711 So. 2d at 1172 (Fla. 4th DCA 1998).

Empirical research shows that unpredictable punitive awards directly affect companies' willingness to invest in research and development, often discouraging the introduction of new products to the market. See W. Kip Viscusi, *Does Product Liability Make Us Safer?* (Vanderbilt Law Sch. Faculty Publ'ns 2012) at 28 ("New products posing uncertain risks are especially hard hit [by excessive awards] so that product liability often serves as a barrier to innovations that would reduce accidents"). "Because a high level of legal uncertainty and scientific innovation cannot coexist, new safe products may be kept off the market" if the punitive award stands. Richard Mahoney & Stephen E. Littlejohn, *Innovation on Trial: Punitive Damages Versus New Products*, 246 *Science* 1395, 1395 (Dec. 15, 1989).

The law should encourage, not stifle, the development of safer products. To that end, the Court should enforce the existing boundaries on punitive liability and reverse the lower court.

CONCLUSION

Florida law, federal due process, and public policy all require the same result: punitive damages are unavailable here as a matter of law.

But at a minimum, the award is excessive and must be reduced. The judgment should be reversed.

Dated: July 9, 2026

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that:

1. This brief complies with the type-volume limit of Fed. R. App. P. 29(a)(5) because this brief contains exactly 3,701 words, excluding those parts of the brief exempted by Fed. R. App. P. 32(f).

2. This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionally spaced serif typeface using Microsoft Word in 14-point Century Schoolbook.

Dated: July 9, 2026

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Washington Legal Foundation

CERTIFICATE OF SERVICE

Under Fed. R. App. P. 25(c)(1)(D) and 11th Cir. R. 25-3, I certify that on July 9, 2026, I filed the above amicus curiae brief with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all registered CM/ECF users.

Dated: July 9, 2026

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