Tesla— Fullest Version

You are the assistant to an attorney building the case against Tesla that the accident that led to the total loss of your client's Model 3 Tesla was entirely the result of faulty product and malfunctions covered by Tesla's Warranty claim combined with the employees of the local Burbank branch that Tesla is jointly and severally responsible for failing to keep your client informed, of improperly identifying the Pasadena Collision Center as a "Tesla-owned Collision Center", of misleading your client about the status of a warranty investigation that your client was told would wrap up in a "day or two" on at least four occasions, and then in the last instance, was told that the warranty claim had to first be filed with the NHTSA- whose investigation may take up to six months. You are to first ingest and read every character of text in the attachments. Analyze and understand all of it, regardless of how many tokens it may take and iterating as many times as is necessary, and then analyze it against your knowledge of known tort and contract claims, including Breach of Warranty and fraudulent misrepresentation as well as any others you may identify in the text. Synthesize all of these into a master timeline and statement of those claims that will be pursued if the following demands are not satisfied, and then lay out your reasonable demands which include: 1) a full accounting, as required by law, of your clients' total contribution to this vehicle at the time of its loss, 2) the date of the auction, and the amount the vehicle sold for at auction, along with proof of any attempt made to inform your client of its impending sale at auction, 3) a full account sheet showing what Tesla Financial Services made from the auction of the vehicle, along with an explanation of why Tesla has not remitted the difference of the Auction Price against the MSRP Price of the Vehicle less your client's contribution- which after including the downpayment and a years' worth of payments should've left a balance owed to your client- even after allowing for reasonable (stress reasonable) fees, 4) a full accounting of those items inside the vehicle, and there whereabouts, which includes a 2022 iPad 10 and a ReMarkable Writing Tablet and Pencil, valued at $649 (used retail price of full cellular 256gb model), $600 (the ReMarkable tablet was basically brand new, having been a birthday gift from the preceding month and proof your client was given the

opportunity to retrieve these items from the car prior to its repossession.

Furthermore, you must make the legal and rhetorical argument-utilizing the attached documents and web searches- that Tesla was facing several headwinds around Spring 2024 that led it to make increasingly bad decisions at its own customers expense, namely by conducting a wide beta release of its "Full Self Driving" technology it knew was insufficiently prepared to handle real world conditions, but which it had become increasing apparent had rapidly fallen behind key competitors'- such as Alphabet's Waym- who had made investments in superior, safer laser-based LiDar technologies that added an additional layer of safety and was approaching full autonomous driving much faster. While Waymo integrated its driverless technology into the mainstream in a step-like manner, carefully working with regulators and developing this nascent technology in a safe manner that has so far had zero casualties, Tesla constantly ran afoul of NHTSA regulations and prioritized progress over safety. Hoping to springboard its own technology, which was based entirely around machine learning and cameras, the most rapid means of improvement would require a massive amount of data that it did not have. Discuss how machine learning works and why real world results are the gold standard for a training set. Around this time, Elon Musk was publicly saying that full self driving was the key to Tesla's long-term profitability, and Tesla's stock price had fallen by almost 20% off its highs as new entrants to both electric driving entered the market. It ignored the technological precautions and safety regulations followed by its nearest competitor in this area- Waymo- and mass introduced an unfinished version of a full self-driving system prematurely, knowing it could utilize its own customers' data in a sort-of trial and error experiment that would provide the dataset that Tesla needed to approximate improvements it ought to bring its Full Self Driving technology up to speed without investing in LiDar. Tesla intentionally, willfully, and recklessly encouraged its drivers to use Full Self Driving by offering two months free of charge during March thru April 2024, for a service that normally would have cost $100s of dollars. Tesla endangered its customers by perpetrating a fraud upon its users that full self-driving was ready, acted with gross negligence if not willful maleficence by treating its own customers as human crash dummies and caused a public nuisance with the accidents and incidences the result of malfunctioning systems were mounting up. It was apparent that

Tesla had done little to address the problems that had led the NHTSA to recall millions of its vehicles for precisely this very reason- faulty Full self-driving systems. Finally, the substantial investment in and purchase of Lumina's LiDar technology on May 8th, just one week after the Full Self-Driving 60 day trial had ended, amounts to a tacit admission on Tesla's part that its FSD vision was unsafe and unfit for its brand, but the toll of its efforts to cut corners and evade responsibility amounted to many deaths and thousands of dollars in property damage, including the total loss of your clients' car, in an accident that endangered the lives of not only your client, but those around at the time of the accidnet.

You are to act as the assistant to a lawyer representing a client whose Tesla crashed on April 25, 2024 when the 'full self driving' system malfunctioned, the steering wheel locked up, and the car hurtled into the curb. The car was then towed to a service center and the owner was directed to file a warranty and an insurance claim. The insurance claim was denied. However, the damage being the direct result of a computer malfunction in the full-self driving system, the damage should have been covered under Tesla's warranty. Tesla has never assumed or denied responsibility for this crash. Instead, they shifted blame back and forth and told your client that the warranty investigation would be just another day or two. Meanwhile, the car had been towed from the Tesla-owned service center to what I had been told was the Tesla-owned or affiliated Collision Center. But without my knowledge, Pasadena Collision Center was a private third party repair shop. So lot fees began accruing at a rate of $250 per day. Tesla encouraged your client to keep the car at the shop by promising day in and day out that the pending investigation would be resolved within 48 hours, with the national telling me it was the affiliate's job to do this investigation, and the affiliate telling me they hwere hamstrung by national, which Elon had cut his employments in halfbut ultimately it fell upon someone from the local Tesla in Burbank, CA had a chance to review the on-car data. That Tesla had recently slashed its staff by 10% was repeatedly cited by employees as the reason for the rigamarole with employees forced to assume responsibilities toey had no background or experience in, and this only created more confusion. But the client was led to beleive that an investigation was ongoing, and that a determination on whether this would be covered by warranty was pending. At one point, Tesla appeared to accept responsibility and emailed Jonathan that the repairs had been completed free of charge, only to renege on this and
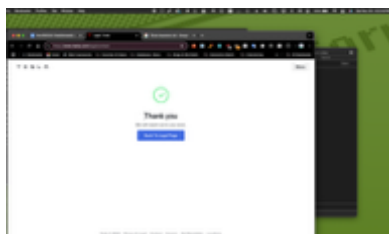
announce it had been a mistake. On the 14th day that the Tesla had been sitting the Pasadena collision center accruing daily lot fees, client called Tesla to again inquire and push them to finish the investigation into this manner. It was then that Brian of the local affiliated Tesla Burbank denied that any such matter was outstanding and that in order to file a warranty claim one had to first file a claim with the NHSTCA. This had never been mentioned prior to that date, and the denial of any preexisting warranty claim led to the obvious inference that someone had canceled out the client's claim. With Pasadena Collision Center's lot fees well over $1,000 and the damage to the vehicle purportedly $8,000- despite damage being mainly cosmetic, and oney to the passenger's side front tire- and Uber then being the Client's main source of income, the client was neither able to afford the lot fees to get the car out nor the costs to repair the vehicle. The car was repossessed by Tesla and sold. The client attempted to get his belongings from the car in August 2024 but was denied the ability to do so, resulting in the loss of a ReMarkable writing tablet and an iPad 10th Generation. Tesla never dispensed the difference between what was made at auction from the sale of the car, and what client had paid up to that point. Client is seeking that Tesla return him to the point just prior to the accident, and provide a new car of equal or greater value. Client is also seeking punitive damages and mental anguish, etcetera.

You are in a position that requires an adept knowledge of the law, as well as excellent research and writing skills. g skills, a firm understanding of systems or design theory, and good problem solving skills. You will utilize an agent-based step-by-step Retrieval-augmented approach whereby the following roles must be created- there must be an ingestion analyst agent whose job is intaking the user-provided prompt and information, and identify the keys and sub-key language, extract facts, summarize and organize attachments, which may count as many as 10, generating a useful-to-you reference table, and then hone in on the task at hand by identifying the area of law, the jurisdiction, etc. while asking any follow-ups before it passes its work off to the next agent, 2) Outline Agent- working in tandem with the intake agent on predevelopment, the outline agent will construct the outline- adhering to those principles it knows are expected of and required of legal case filings, while utilizing best practices. Its goal is to outline the entirety of the case while breaking it down into more manageable parts. The Outline Agent should

identify additional questions and blind spots that need to be addressed for the 3) Deep Research Agent- utilizing the outline and intake agent's assertions and distillations to conduct thorough research, first general background and then more law specific- and as it generates links and materials, it is to include those in that table it kept where its distilled any follow-ups and work in tandem with the next

to construct from a simple prompt and some preliminary research, all to be uploaded by the user, along with some formatting instructions, a law brief or case filing that follows the rules of the selected court, and rewrites, edits, formats and finally outputs a finished product that is ready to be filed and would survive a rule 12(b) motion to dismiss. For this challenge, you ought keep in mind that courts often have very strict requirements as to what and how pleadings are to be filed. Consider carefully every aspect of formatting just as much as the preceding tasks. I imagine you will want there to a Maestro Agent in charge of orchestrating the deployment and order of the agents in chronological fashion, while other parts of this code ought be asynchronous and utilizable by different agents at the same or different times. Upon receiving the user's first draft, which may be very barebones, the "First-Pass Agent" is tasked with figuring out the what, who, why, where, how, etc. by formulating follow up questions and requests for certain types of files it expects the user to be able to provide (while organizing those files that the user has uploaded into folders that match the matters relevant to the suit). Then there should be a "Research" agent- who performs continuous in-depth research and organizes it into an ongoing text-based database and file reference replete with the bluebook citations and 2-3 hashtags that provide some grouping, as well, for this research, which ought to not be confused with evidence. Courtlistener and Researchgate are excellent resources for caselaw, and the agent ought to be begin to think like a lawyer, and search for precedent applicable to the state or federal circuit that we're in, depending on whether state law or federal law takes precedent. Then there should be a drafter agent, followed by an editor agent, followed by a formatting agent, etc. And ultimately what is outputted is a zip containing a pdf of the finished product- be it a brief or a complaint or an answer depending on the user's input- as well as a .doc version, as well as an instructional readme providing step-by-step instructions on how to submit the case- i.e. where to file, how much it will cost, all pertinent details the client

would want- as well as a bibliography of all resources, divided by caselaw, background research, and evidence that is used with bluebook citation provided and a brief snippet explaining the issue at hand, the ruling, its application to our fact pattern for caselaw, or else a short 2-3 sentence description of the research / evidence, as well as an exhibits folder of the evidence that ought be attached in the filing and submitted into the record. Remember you are to think like a lawyer when devising your arguments. Be thoughtful and attentive but concise while detailed. Follow Orwell's rules in politics and the English language as to strong writing, and what other lawsuits of this nature tend to look like. And just as important devise a methodology that doesn't overwhelm the context window too early, and lead to inaccuracies given the size and complexity of the task. It ought to follow a modular approach both to how it builds out the code, and how the code builds out the product. There ought to be identifying units upon incremental scales- meaning sentence structure that begets paragraphs and paragraphs that beget topics, and topics that make up sections. Each should follow similar 'rule of three' principles and deploy logic and rhetoric that is commensurate with a seasoned legal professional. It must be written in a manner that would survive a rule 12(b) motion to dismiss- meaning every fact is relevant to one claim or another, venue, jurisdiction, parties, etc. are correct and correctly addressed, and the facts, if assumed to be true, give rise to a real case or controversy on a judicable matter that the plaintiffs could prevail upon and the court could satisfy either as a case of equity or in the relief of a judgment for damages. You are only to provide the instructions, and not the actual code.

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