**Background Facts:**

On January 15, 2022, at about 12:56 pm Luz Lema was the restrained driver of a 2009 Mercedes C300 4DR sedan that was stopped, facing east, in the driveway of a private parking lot located on the west side of US-19, near CR-39, Pinellas County, Florida. A 2020 Genesis G70 4DR sedan, driven by Yezen Karadsheh, was northbound in the left lane of US-19 and made a left turn, towards the driveway occupied by Ms. Lema, in front of a 2021 Toyota 4Runner, driven by Robert Brady with restrained passengers Jessica Brady (right front), Juliana Brady (right rear) and Ryleigh Brady (center rear), that was southbound in the right lane of US-19. The front of the Toyota impacted the right rear quarter panel of the Genesis, which resulted in the Genesis being directed to the south and its left rear quarter panel/rear bumper struck the driver’s door and left front fender of Ms. Lema’s Mercedes. The images below depict the police diagram and the subject Mercedes and Genesis sedans, post-collision:

A diagram of a road with a few objects

Description automatically generated with medium confidence

**Police diagram, Ms. Lema’s Mercedes is labeled “V03”**

A car with a dent on the side

Description automatically generatedA car with a dented door

Description automatically generated

**Ms. Lema’s Mercedes, post-collision**

A black car with a dented rear end

Description automatically generatedA black car with a reflection of a person on the side

Description automatically generated

**Genesis, post-collision with the Toyota**

A car with a damaged bumper

Description automatically generatedA black car with a dented back

Description automatically generated

**Genesis, post-collision with the Mercedes**

A comparison of a car parking lot

Description automatically generated**A close up of a car

Description automatically generatedA back of a black car

Description automatically generated**

**Toyota, post-collision with the Genesis Toyota, police report damage profile**

No damage estimate was provided for the Mercedes for review. The provided photos showed damage to the driver’s door, driver’s door side view mirror, left front fender and the side head curtain air bag deployed. The driver’s door window appeared to be shattered, but intact, and Mr. Lema testified it was damaged. The Mercedes was towed from the scene.

No damage estimate was provided for the Genesis for review. The provided photos showed damage from the impact from the Toyota to the right rear passenger door, rocker panel molding, right rear quarter panel, right rear wheel, and the right side of the rear bumper cover. Damage from the impact into the Mercedes was to the left side of the rear bumper cover, left rear quarter panel, left rear lighting assembly and the trunk lid. The Genesis was not towed from the scene and there was no report of air bag deployment. Mr. Karadsheh stated in Defendant’s Answers to Plaintiff’s Interrogatories that the vehicle was a total loss.

No damage estimate or independent photos of the Toyota were provided for review. A small portion of the Toyota was seen in photos of the Genesis and damaged appeared to be the left front corner. The police report described the damage as functional with an estimate of $5,000. The Toyota was not towed due to damage and there was no report of air bag deployment.