

Rule 26(a)(2)(B) Expert Testimony Summary

Expert Witness: Stuart J. Landsverk

Qualifications & Background:

- NIADA Certified Master Dealer (CMD).
- 35+ years in automotive dealership operations, auto finance/underwriting, and insurance compliance.
- B.S. in Management, Northern Illinois University.
- Arizona Auto Dealer and Property/Casualty Insurance Licenses.
- **Career Retention:** Retained as an industry expert more than 40 times, frequently as a consulting (non-testifying) witness.
- **Retention Split:** Approximately 50/50 defense/plaintiff.
- **Expert Reports & Testimony:** Prepared approximately 25 expert reports; deposed 7 times and provided in-court testimony once. Many matters settle before trial.

Scope of Summary:

This summary discloses my prior testimony as an expert witness in the preceding four years (covering approximately July 2022–July 2026), as required under Federal Rule of Civil Procedure 26(a)(2)(B)(v).

- **Compensation:** All engagements were compensated at standard rates (\$500–\$600/hour for depositions/trials, with applicable flat fees for testimony).
- **Topics of Expertise:** Testimony focused on automotive industry standards, including dealership security, employee training, F&I practices, auto financing/compliance, GAP insurance, title disclosure, and trademark issues.
- **Limitations & Exclusions:** No testimony in the last four years exceeded 10 hours per case. No Daubert challenges or exclusions.

Prior Testimony List

1. Deposition: Alfa Corporation v. Alpha Warranty Services, Inc.

- **Case Details:** No. 2:20-cv-553-MHT-SMD, United States District Court for the Middle District of Alabama, Northern Division. (Plaintiff: Alfa Corporation; Defendant: Alpha Warranty Services, Inc.).
- **Date and Type:** May 19, 2022 (Deposition, approximately 6 hours).
- **Role and Topics:** Retained by Plaintiff as an expert on automotive warranty services and trademarks. Testified on industry standards for naming conventions, consumer confusion in marketing, and compliance with federal trademark laws.

2. Deposition: Earl Phillip Lawyer, III v. Byron Victor Gutierrez, et al.

- **Case Details:** Case No. A-21-829125-C, Eighth Judicial District Court, Clark County, Nevada. (Plaintiff: Earl Phillip Lawyer, III; Defendants: Byron Victor Gutierrez, individually; Aztec Motors, LLC dba Baja Auto Sales; Sahara Motors Unlimited, LLC dba Newport Motors; et al.).
- **Date and Type:** May 9, 2023 (Deposition, approximately 7 hours).
- **Role and Topics:** Retained by Plaintiff as an expert on dealership operations and liability. Testified on NIADA standards for employee hiring/screening, key control/security protocols, and employer best practices.

3. Trial Testimony: Rosemary Lawyer and Kiana O'Day, as Special Administrators of the Estate of Earl Phillip Lawyer, III, et al. v. Byron Victor Gutierrez, et al.

- **Case Details:** Case No. A-21-829125-C, Eighth Judicial District Court, Clark County, Nevada. (Plaintiffs: Rosemary Lawyer and Kiana O'Day, as Special Administrators of the Estate of Earl Phillip Lawyer, III, and Earl Phillip Lawyer III, individually; Defendants: Byron Victor Gutierrez, individually; Aztec Motors, LLC, a Limited Liability Company dba Baja Auto Sales, a Nevada Limited Liability Company; Sahara Motors Unlimited, LLC dba Newport Motors; DOES 1 through X, inclusive; and ROE BUSINESS ENTITIES I through X).
- **Date and Type:** October 1, 2025 (Trial Testimony, approximately 4 hours).
- **Role and Topics:** Retained by Plaintiffs as an expert on automotive dealership liability and operations. Provided live testimony on industry best practices for key security, employee supervision, and risk mitigation, which contributed to the jury's \$3.34 million verdict.

4. Deposition: Federal Trade Commission and People of the State of Illinois v. ACIA17 Automotive Inc. d/b/a Leader Automotive Group, et al.

- **Case Details:** Case No. 24-cv-13047, United States District Court for the Northern District of Illinois, Eastern Division.
- **Date and Type:** July 2026 (Deposition, approximately 8 hours).
- **Role and Topics:** Retained by the Defense as an expert on auto finance/lending practices, F&I add-ons (including GAP), dealership compliance, advertising/pricing norms, CSI measurement, market conditions (2021-2023), and the role of corporate executives versus store-level personnel. No Daubert challenge or exclusion.

Summary of Engagements

- **Total Engagements in Preceding Four Years:** 4 (3 depositions; 1 trial).
- **Retention Split (Four-Year Period):** Three plaintiff-side; one defense-side.
- **Overall Career Statistics:** Remain as stated above (40+ retentions, ~25 reports, ~50/50 split, 7 depositions total, 1 trial).
- **Availability:** Full transcripts and reports are available upon request (subject to confidentiality restrictions).

This summary is complete as of July 30, 2026.

I declare under penalty of perjury that the foregoing is true and correct.

Stuart Landsverk

Date: July 30, 2026