

Y & G **MOCK TRIAL**
FACT SITUATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39

Bailey Matsumoto is the founder of a startup for self-driving trucks. Bailey had previously worked in the entertainment industry as a script writer and producer. Taylor (later Taylor Matsumoto) worked as Bailey’s technical advisor, providing expertise on Bailey’s scripts and films focused on science and technology. Bailey’s films were not successful at the box office, so Bailey decided to pursue an alternative plan to create a startup for autonomous trucks. Seeing Taylor’s expertise in technology, Bailey asked Taylor to join the startup. Bailey and Taylor left the entertainment industry to focus on the startup. Bailey put all of Bailey’s savings into this startup.

Bailey and Taylor quickly developed a romantic relationship and were married in October 2018. After the marriage, Taylor and Taylor’s 16-year-old son, Michael, moved into Bailey’s mansion at 2349 Chandler Drive in Hollywood Hills. Bailey had inherited the mansion about two years prior. Desi, Bailey’s cousin and only surviving relative, also lives in the mansion.

While the relationship between Bailey and Taylor started out wonderfully, it quickly became strained by a tragic accident. Taylor often dropped off Michael at his high school, located two miles from the mansion. One morning in January 2019, when Taylor and Bailey were at an investor meeting for their startup, Michael rode to school on a prototype self-driving scooter that belonged to Bailey without Bailey’s permission. On the way, the self-driving scooter malfunctioned and Michael rammed into a building. Michael was immediately killed by the impact.

After the death of Michael, Taylor was incredibly sad and developed a strong disdain for autonomous technologies. To help cope with the grief, Taylor founded an organization called “Parents Against Autonomous Driving” (PAAD). Taylor became a vocal advocate for the cause and was frequently invited by the media to speak about the dangers of autonomous technologies.

Several potential investors watched Taylor’s interviews on news channels and expressed to Bailey their worries about the future of the startup. PAAD was endorsed by several congresspersons across the country. Bailey and Taylor frequently argued over one another’s involvement. Bailey and Taylor began to sleep in

1 different rooms; Bailey slept in the bedroom by the movie room
2 and Taylor slept in the master bedroom.

3 On the afternoon of Friday, June 7, Bailey and Taylor got into a
4 disagreement concerning upcoming events. Taylor planned to go
5 to Capitol Hill in Washington, D.C., to testify in favor of the
6 *National Moratorium on Autonomous Technologies* bill on June
7 10. Bailey was scheduled to have a meeting with Bailey's startup
8 investors on the same day. That Friday evening, Taylor was
9 invited to a PAAD member's house to discuss the upcoming
10 hearing in Washington, D.C., and to share dinner and drinks.
11 Casey, also a PAAD member, picked up Taylor at 7:00 p.m.

12 After Taylor left, Bailey went to purchase roses and champagne,
13 and then returned to the mansion. At 8:15 p.m., Val, Bailey's
14 friend, joined Bailey and Desi at the mansion for a movie. At
15 10:30 p.m., Val left the mansion and Desi retired to the kitchen.

16 At the PAAD member's house, Taylor became noticeably drunk.
17 At 11:00 p.m., Casey dropped off Taylor at Bailey's mansion.
18 When Taylor entered the home, Desi informed Taylor that Bailey
19 had prepared a bath for Taylor in the master bathroom. The
20 bathtub there was ground level. On both ends of the bathtub were
21 two stacked marble ledges. On the south end of the bathtub,
22 protruding from the lower marble ledge, was a stainless steel
23 trough where water came through in place of a faucet. The door
24 between the master bathroom and the hallway remained closed.

25 The next morning, Desi found Taylor clothed and floating face
26 down in the bathtub with Taylor's head positioned towards the
27 south end of the bathtub. Taylor was dead. The bathtub was still
28 filled with water and rose petals. A wine glass was found on top
29 of the lower marble ledge about three feet above the surface of the
30 bathtub. The floor near the ledge was sticky from spilled
31 champagne and was strewn with a few shards from a broken
32 champagne bottle. The floor was slightly wet at various places
33 along the tub and from the edge of the tub to the center of the
34 room, with rose petals strewn across the floor too.

35 Desi contacted the police, and Detective Eisenberg arrived to
36 conduct an investigation. Desi and Bailey led Detective
37 Eisenberg to the master bathroom. Detective Eisenberg examined
38 the body and noticed a bruise running vertically at a slight angle
39 on the back of Taylor's head. It was nearly 1.5 inches wide and
40 four inches long.

1 Detective Eisenberg interviewed Bailey and Desi separately.
2 During Detective Eisenberg's interview with Desi, Desi explained
3 that Desi last saw Taylor when Taylor arrived home drunk and
4 knocked over a vase in the foyer, around 11:00 p.m. Desi also
5 claimed to hear a crash in the master bathroom around 11:20 p.m.
6 Desi explained finding Taylor's body that morning. Detective
7 Eisenberg interviewed Bailey next. During Bailey's interview,
8 Bailey explained that Bailey and Taylor had a disagreement
9 earlier that day so Bailey prepared a rose-petal bath for Taylor.
10 Bailey claimed that Taylor was drunk but alive when Bailey left
11 Taylor in the master bathroom around 11:30 p.m.

12 The detective asked Bailey if the detective could look around the
13 mansion, and Bailey responded that the detective could search the
14 house and garage. During Detective Eisenberg's search, Detective
15 Eisenberg noticed a golf club in Bailey's car. [Later, Desi allowed
16 Detective Eisenberg to search the guest house, which is
17 unattached from the main house. The separate guest house
18 includes an attached office accessible by an exterior and interior
19 door.

20 The interior door to the office was locked, but the exterior door
21 was unlocked. Detective Eisenberg entered the office through the
22 exterior door and searched the office. The office contained
23 Bailey's scripts and memorabilia from Bailey's time in the
24 entertainment industry. Detective Eisenberg found a script titled
25 *Roses and Robots: A Murder Mystery*, which lists Bailey as the
26 writer. In the story, a robot intoxicates and pushes its owner into a
27 rose-petal bathtub, with the intent that the homicide appears to
28 look like an accident.]

29 The cause of death was later determined to be drowning. Based on
30 the information Detective Eisenberg collected through interviews,
31 physical evidence and forensics reports, Detective Eisenberg
32 arrested Bailey and charged Bailey with the murder of Taylor.

33

34

STATEMENT OF CHARGES

35 The defendant is charged with first degree murder, which is the
36 unlawful killing of another human being that was willful,
37 deliberate, premeditated, and with malice aforethought.

38

PHYSICAL EVIDENCE

1 Only the following physical evidence may be introduced at trial.
2 The prosecutor is responsible for bringing:

- 3 1. Exhibit A, Official Diagram of the Floor Plan of Bailey's
4 Mansion
- 5 2. Exhibit B, Master Bathroom Layout
- 6 3. Exhibit C, Bailey's *Roses and Robots* Script
- 7 4. Exhibit D, Golf Club Found in Bailey's Car
- 8 5. Exhibit E, Diagram of Taylor Matsumoto's Head Injury

9

10

STIPULATIONS

- 11 1. For the purpose of the pretrial argument, Exhibit A may be
12 used.
- 13 2. Dr. Jackson and Dr. Wolpert are qualified expert witnesses and
14 can testify to each other's statements.
- 15 3. If the bracketed information is excluded from trial, it may not
16 be used for impeachment purposes.
- 17 4. All witness statements were taken in a timely manner.
- 18 5. The victim died of drowning.
- 19 6. Desi found Taylor clothed, barefoot, and floating face down in
20 the bathtub with Taylor's head positioned towards the south
21 end of the bathtub.
- 22 7. For the purposes of the Mock Trial and pretrial argument,
23 Exhibit C is the only relevant page of the script, and the
24 absence of the remainder of the script cannot be objected to.
25 The handwriting on the script belongs to the defendant.
- 26 8. Exhibit A is the floor plan of the defendant's mansion. Exhibit
27 B is a diagram of the master bathroom where the victim's body
28 was found. Exhibit C is the *Roses and Robots: A Murder*
29 *Mystery* script written by Bailey Matsumoto. Exhibit D is a
30 picture of the golf club found in the defendant's car. The golf
31 club belonged to Taylor Matsumoto's son, Michael. Exhibit E
32 is the official diagram of Taylor Matsumoto's head injury.
33 (Exhibits A, B, and E are not to scale.)
- 34 9. The search of the mansion and Bailey's car was a valid search
35 and may not be objected to.

- 1 10. The arrest warrant of Bailey Matsumoto was based on
2 sufficient probable cause and properly issued.
- 3 11. Dr. Wolpert properly reviewed the lab report, and its absence
4 may not be questioned.
- 5 12. Taylor's Blood Alcohol Content (BAC) at the time of death
6 has been established as .12% and cannot be disputed.
- 7 13. All physical evidence and witnesses not provided for in the
8 case packet are unavailable and their availability may not be
9 questioned.
- 10 14. The fingerprints found on the golf club belong to Bailey
11 Matsumoto.
- 12 15. Taylor was scheduled to go to Capitol Hill in Washington,
13 D.C., to testify in favor of a bill titled *National Moratorium*
14 *on Autonomous Technologies* on June 10.
- 15 16. Other than the wound on the back of the victim's head, no
16 other injuries were found.
- 17 17. Taylor should be referred to by "Taylor", "they", or "their".