

The State of Texas vs. Casey Bryant Mock Trial



Teacher Traffic Safety Academy 2022



Driving on the Right Side of the Road

The State of Texas vs. Casey Bryant Mock Trial

Background of the case:

The Highland Creek subdivision of Anytown, Texas is a quiet neighborhood with friendly families. During Spring Break of 2018, the weather was nice and children enjoyed playing outside. On March 18th of that week, at 2:38 p.m., Casey Bryant (age 18) left her home in the Highland Creek subdivision and travelled north on Creekview Lane.

As Casey approached the bend in the road, Henry Wallen (age 8) rode his bicycle out of the driveway of his home and into Creekview Lane, at which time Casey's car struck Henry and he was thrown from the bicycle. Henry, who was not wearing a helmet, suffered serious head trauma as a result of the crash. Casey stopped to render aid and called 911.

Paramedics arrived on the scene six minutes later and transported Henry to the hospital. He spent three days in the ICU (intensive care unit) while they waited for answers regarding the extent of the injuries. Henry was released from the hospital five days later having suffered a concussion that took over two months to fully recover from and broke both femurs that required months of physical therapy in order to regain the ability to walk again.

The Charge:

The prosecution charges Casey Bryant with three counts:

- Count 1 – Deadly Conduct (Texas Penal Code - PENAL § 22.05.(a) A person commits an offense if he recklessly engages in conduct that places another in imminent danger of serious bodily injury.
- Count 2 – Reckless Endangerment
- Count 3 – Texting while Driving

Evidence:

For the purpose of this mock trial, only the following physical evidence may be introduced at trial:

- Map of Highland Creek Subdivision
- Photographs of the location of the crash
- Screen shot of Casey's text messages around the time of the crash
- Resume for Dr. Denny Manuel
- Resume for Peyton Odell



Alex Wallen - Witness Statement

My name is Alex Wallen, I am 37 years old, and I live at 6214 Creekview Lane in the Highland Creek subdivision. We moved into the neighborhood five years ago because it was such a nice, quiet area. I have twin eight year old sons named Henry and Cole. There were a lot of families with young kids on our street and our boys never had to go far to find someone to play with. That spring break the weather was beautiful and the kids roamed the neighborhood, sometimes going for walks and little adventures along the creek or they'd play hide and seek around the houses with their buddies.

On the afternoon of March 18th, 2018 Henry and Cole were riding their bikes in our driveway and I was watching them from the porch. We have a circular driveway, the kind that makes a "U" shape and is long enough to fit several cars. The boys would ride in a loop, riding through the driveway and going a short distance into the street and coming back around, making a circle. Whenever they were riding like this, I always put out a little orange cone about three feet into the street so the boys wouldn't go too far into the road. They'd just ride a little way out, but never go past the cone. Plus, I figured the cone would help give drivers a heads up that children were playing in the area.

That afternoon I had the cone out there, but it didn't slow the car that struck Henry down one bit. The car came flying around the bend in the road just as Henry rolled into the street. I felt like everything went into slow motion at that moment. I will never forget the sound of the impact and seeing my boy thrown across the pavement. He looked like a rag doll. I ran to him, screaming, and immediately I could see his head was bleeding. I screamed for Cole or for anybody to call 911. I just kept screaming for help. At some point I saw Casey there who was shaking and crying on the phone with the 911 operator. I didn't realize that Casey was the one who had been driving the car until the police informed me later.

Henry was transported to the nearest hospital where he spent three days in the ICU, and then was transferred to the hospital wing for an additional five days. We weren't sure if he was going to make it. He suffered a concussion and broke both his femurs. It took at least two months before he was able to handle a full work load in school and many months after that before he was able to walk properly.

Casey Bryant babysat for Henry and Cole a couple of times and did a great job with them. I believe Casey never meant to hurt anyone, but I will never offer forgiveness for what happened on that fateful day.





Detective Lane Frommer – Witness Statement

My name is Detective Lane Frommer and I have worked for the Anytown Police Department for 14 years. I have a Bachelor's Degree in Criminal Justice from Morrell College and a Master's in Criminal Justice Administration from Hawkhurst University. I am the lead detective in our department and I have conducted 27 motor vehicle crash investigations. Three of those involved bicyclists struck by a motor vehicle.

This particular crash took place on March 18th, 2018. Upon arriving at the scene, my first task was to analyze the location of the car, the bicycle, and the tire marks on the pavement. I was able to determine the location where the cyclist landed by the large amount of blood that was still present. My first impression of the scene was that the car was likely travelling approximately 30-35 miles per hour and did not brake before impact.

I confirmed this when I interviewed the driver, Casey Bryant, later that evening. The defendant claims to have been driving the speed limit and stated that visibility around that bend in the road "was not the greatest." Casey said there was no time to react once Henry rode into the street, but also admitted there may have been distractions that slowed one's reaction time. When asked what would have caused this distraction, the defendant stated, "I don't know. I can't believe this is happening." Since one in five car crashes involve distracted driving, I asked the driver if the phone was in use while behind the wheel. The driver stated that one text was sent while sitting at the stop sign, but not used after that, except to call 911. Casey showed me a screen of text messages and consented to my taking a "screenshot" of what was shown to me. There was no further consent offered for a full investigation of the phone and its use. At that point Casey stated, "I'm sorry but I don't think I should answer any more questions until I see a lawyer."

At that point, we secured a warrant to get her phone records from First Choice Telecom and discovered that the texting timeline didn't quite add up. Casey appeared to have sent and received several text messages after leaving the house and driving the short distance between home and the location of the crash site. We attempted to question the defendant again after we obtained the phone records, but the defendant declined (under the advice of counsel). Even without Casey's cooperation, we were able to determine that multiple text messages, to multiple phone numbers, were sent and received from the defendant's phone during the time they would have been driving. Casey's driving record also indicated that Casey had one previous conviction for distracted driving six months prior to the crash.



Dr. Denny Manuel – Witness Statement

My name is Denny Manuel and I am a Doctor of Psychology. I attended Central University for my undergraduate degree in psychology and University of American Psychology for my Ph.D., specializing in adolescent addictions. My work has been published in numerous scholarly journals, including Adolescent Psychology Today. Most recently, I gained national attention for my work regarding cell phone addiction in teens and adolescents.

This research has shown a startling increase in nomophobia among young adults and teens. Nomophobia is the unnatural attachment to one's cell phone and fear of being out of cellular contact. Symptoms include persistent checking for calls, texts, or any notifications, such as those associated with social media accounts, and high anxiety when one's phone is not in sight. Teens, in particular, are at a heightened risk for nomophobia because their prefrontal cortex is still developing. This is the area of the brain that is responsible for sound judgement, instinctive behavior, and impulsivity.

I have not personally interviewed the defendant in this case. I was asked by the state to review the case documents, and provide my professional opinion on the matter. After reviewing all of the evidence, it is clear to me that Casey Bryant suffers from nomophobia. The cell phone records alone demonstrate that Casey is constantly in contact with the cell phone, which is the number one symptom of nomophobia. This addiction causes distraction and a lack of awareness of one's surroundings, which can be catastrophic while driving.



Peyton Odell – Witness Statement

My name is Peyton Odell and I am a crash scene forensic expert. I have more than 20 years of expertise in the automotive industry dating back to when I was in high school. I hold a bachelor's degree from the prestigious University of Science and a masters degree in civil engineering from Automotive University. I graduated at the top of my class and hold numerous awards and accolades for my dedication to the crash scene industry. I am the current owner of the private consulting firm Expert Crash Reconstructionist. Many companies seek our support for better understanding of accident causation, prevention, safety analysis measures, and demonstrative exhibit preparation. My area of expertise includes crash investigations, crash reconstruction, bicycle safety, driver behavior, driver safety, human factors, seat belts and air bags, and traffic/highway safety.

I am paid for my work, but that does not influence the outcome of my information for I am highly regarded in my field with impeccable character. As I tell those that hire me, I call it as I see it, not how you want me to see it. Sometimes my clients use my information, and sometimes they don't. I rather suspect it comes down to whether or not they agree with my analysis or not. I do not know the Bryant family, and I am not concerned one way or the other with the outcome of this case. I am merely here to report my findings, however that may help. I was contacted by the Bryant family's attorney to conduct an analysis of a crash that happened on March 18th, 2018 in the Highland Creek subdivision.

As for my findings, I hold great confidence to report that, unfortunately, the cause of the crash on that day was due to small children not obeying traffic safety measures creating an unsafe environment for themselves and others. Upon analysis, it is clear that anyone coming around the bend on Creekview Lane going the legal posted speed limit of 30 mph, which I do believe Casey was doing, would not have enough time to stop to avoid an obstacle in the road. There were no skid marks in the area matching Casey's tires which would demonstrate unsafe speeds at the bend, nor were there any eye witnesses stating an unsafe speed for her car on that day. In addition to the bend in the road, you will notice a bush protruding from the area at the bend causing an inability of a driver to see around the corner. The only way to have avoided this unfortunate event was for the children to not have been on the road in the first place, and to have secured the necessary helmet and knee pads for their protection. If these measures had been taken, the children on the bikes would not have been harmed.





Cory Keen – Witness Statement

My name is Cory Keen and I teach U.S. History and Government at Reedwater High School. I have a bachelor's degree in secondary education and a master's degree in U.S. History. I've taught numerous social studies classes throughout my 17 years at Reedwater. Casey Bryant was in my U.S. History class last year and is currently enrolled in my Government class this year.

I have seen numerous students come and go through the years. Casey stands out as a highly responsible, caring, motivated, and extremely intelligent individual. Casey is a leader both inside the classroom and out, on whom I can always depend to set a good example. Last year, one of the freshmen was being harassed online by his classmates and Casey reported it to the Assistant Principal immediately. Due to that quick action, we were able to punish the offenders and get help for the victim.

In my class, Casey never misses an assignment, always turns homework in on time, and maintains an "A" average. In fact, Casey has never scored below a 93 on any of my assessments. This student is always willing to tutor classmates prior to a test and is quick to organize study groups which benefit everyone involved. People are quick to ask Casey for help when they need it and I was not surprised when Casey was nominated captain of the swim team.

As a high school teacher, cell phone use is a hot topic. Our school policy states: "Reedwater High School allows the use of electronic communication devices by students at specified times. Unless given permission by staff personnel, cell phones should be off and out of sight in the classroom." In my classroom, students know that I strictly follow this guideline. If I see a student using their cell phone in my classroom, I confiscate it immediately. While I have had to enforce this consequence for some students, it has never been a distraction for Casey. Anytime my students need access to technology, we have laptops in the classroom for their use.

It came to my attention that Casey was involved in the car crash in the Highland Creek Subdivision that occurred on March 18th and is being accused of texting while driving. I can't think of a student less likely to act so irresponsibly. Casey is a rule follower and, in my opinion, would never use a phone while driving nor harm another individual. I have such confidence in this student's character that I would trust Casey with my own child's life.





Map of Highland Creek Subdivision





Location of the Henry Wallen's home with circular driveway in front, facing Creekview Lane.



Screen Shot from Casey Bryant's cell phone, taken by Detective Frommer on the evening of March 18th (the date of the crash) at 7:40 p.m.



Dr. Denny Manuel

Psychologist

Denny Manuel, Ph.D.

123 Big Street
My City, TX 12345

123.456.7890
Denny_Manuel@notreal.com

Education

Central University / Bachelors of Arts in Clinical Psychology
Fall 2010-Spring 2015

University of American Psychology / Doctor of Psychology
Fall 2015 - Spring 2019

Experience

Private Practice / Consultant

Spring 2019 - PRESENT

Working with a diverse caseload including adults, adolescents, and families facing mental health issues as related to technology and cell phone addiction, and providing information and support as required.

Central Cross-Oak Inpatient Hospital / Resident Specialist

MAY 2017 - MARCH 2020

Specialized in inpatient care for severe cases of cell-phone addiction, withdrawal, rehabilitation, and recovery. Provided group counseling, family support services, outpatient aftercare services, and long term counseling.

Research Assistant / Research Assistant

AUGUST 2012 - MARCH 2016

Responsible for administration and operational duties such as, answering phone calls, responding to emails, summarizing patient results, and ensuring all research subjects comply with necessary instructions.

Skills / Awards

Author - "Rights and Responsibilities in the Age of Technology: Information Saturation and the Teenage Brain" (Metacognition Monthly, January, 2020)

Author - "Disaggregating Data to Diagnose Nomophobia From a Distance During a Pandemic" (Unpublished Study)

Awarded Central University Psychology Department's Most Distinguished Alliterative Author

Toastmasters Promise Keepers Chapter Founding Member

Peyton Odell, M.Eng.

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Your City, TX 12346
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peyton_odell@notreal.com

EXPERIENCE

Expert Crash Reconstructionists, Texas; Owner
JULY 2020 - PRESENT

Conduct complete traffic accident reconstruction services for insurance agencies, attorneys, government agencies and crash scene investigators; Consult with crash scene and forensic experts to determine cause; focus on crash data retrieval, accident causation, accident prevention, safety analyses, photographic documentation, and demonstrative exhibit preparation.

Automotive Safety Consultants, Louisiana; CEO
SEPTEMBER 2009 - JULY 2020

Worked with experts in the field to strengthen safety measures for automotive companies; Traveled 250+ miles a week meeting with clients regarding safety standards and how to implement best practices; Trained clients in the use of industry based standards for safety and followed up with clients 2 weeks after conclusion of consultation to ensure customer satisfaction.

Automotive University, Texas; Professor
AUGUST 2006 - AUGUST 2009

Taught classes according to needs within the engineering department; Prepared curriculum for engineering entry level courses; Communicated with experts in the field regarding programs and how to utilize them; Conducted research in specific areas of study and implemented newly found research into curriculum when possible.

EDUCATION

Automotive University, Texas; AUGUST 2005 - JUNE 2007
Master Degree in Civil Engineering

University of Science, Texas; AUGUST 1999 - JUNE 2004
Bachelor of Sciences

AREAS OF EXPERTISE

Crash Investigation; Crash Reconstruction; Bicycle Safety; Driver Behavior; Driver Safety; Human Factors; Seat Belts & Air Bags; Traffic/Highway Safety

AWARDS & ORGANIZATIONS

Outstanding Engineering Senior Award, *University of Science*

Graduation with Honors, National Dean's List College Honor Roll

American Gas Association Scholarship

Society of Accident Reconstructionists (SOAR)
California Association of Accident Reconstruction

Specialists HONOR (CAARS) SOCIETIES National

Association of Professional Accident Reconstruction Specialists, Inc. (NAPARS)

Pi Tau Sigma, Mechanical Engineering Honor Society

Tau Beta Pi, Engineering Honor Society

People v. Bryant Sign-Up Form

Prosecuting Attorneys

Opening Statement:
Direct of Alex Wallen:
Direct of Detective Lane Frommer:
Direct of Dr. Denny Manuel:
Cross of Casey Bryant:
Cross of Peyton Odell:
Cross of Cory Keen:
Closing:

Defense Attorneys

Opening Statement:
Cross of Alex Wallen:
Cross of Detective Lane Frommer:
Cross of Dr. Denny Manuel:
Direct of Casey Bryant:
Direct of Peyton Odell:
Direct of Cory Keen:
Closing:

Witnesses for the Prosecution:

Alex Wallen:
Detective Lane Frommer:
Dr. Denny Manuel:

Witnesses for the Defense:

Casey Bryant:
Peyton Odell:
Cory Keen:

Time Keeper for the Prosecution:

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Time Keeper for the Defense:

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Jury Members:
