

CLOSING ARGUMENT
PLAINTIFFS

Santa Cruz De Leon Sauceda and Martha Martinez

v.

Iraissy Montalvo Reyna

Cause No. C-2344-19-E

275th District Court, Hidalgo County, Texas

Trial Date: February 2026

Estimated Time: 20-25 minutes

(Plus 5-7 minutes for rebuttal)

I. INTRODUCTION – RESPONSIBILITY [2-3 min]

[Stand at podium. Make eye contact with entire jury. Speak slowly.]

Ladies and gentlemen of the jury,

— PAUSE —

When we started this case, I told you it was about a simple rule of the road. A rule that every one of us depends on every time we get behind the wheel: when you are driving, you must keep a proper lookout, control your speed, and never put yourself in a position where you strike the car in front of you.

Now that you have heard all the evidence, that question is no longer abstract. It is concrete. It has names. It has faces. It has consequences.

— PAUSE —

On September 28, 2017, Santa Cruz De Leon Saucedo was stopped in her lane of traffic on FM 3072. Martha Martinez was seated beside her in the passenger seat. They were doing exactly what the law requires. They were where they were supposed to be.

The Defendant, Iraissy Montalvo Reyna, came up behind them. She attempted to pass in a no-passing zone. And she struck their vehicle from behind.

That much is not disputed.

II. LIABILITY – THE FIRST QUESTION [4-5 min]

[Walk the jury through the liability evidence.]

The law requires a driver to keep a proper lookout, control their speed, and maintain a safe distance. When a driver fails to do that and strikes a stopped vehicle, that is negligence. Not an accident in the everyday sense of the word—negligence in the legal sense.

Let me walk you through what the evidence showed.

The Police Investigation

Officer Valdez of the Hidalgo Police Department responded to the scene. He investigated. He spoke to both drivers. He observed the roadway and the damage. He documented what he found.

His report placed responsibility where it belonged—on the Defendant.

You heard the Defendant herself say she would be 'surprised' to learn she was found at fault. But surprise does not change reality. The evidence is what it is.

— PAUSE —

The Physical Evidence

You saw the photographs. You saw the damage to the rear and side of Ms. Saucedá's Chevrolet HHR. You saw the property damage estimate from Vic's Auto Rebuilders.

That damage does not happen unless the trailing driver fails to maintain proper control and clearance. That damage tells you what happened on FM 3072.

What the Evidence Does NOT Show

Nothing in the evidence shows that Ms. Saucedá did anything wrong.

Nothing shows that she suddenly reversed. Nothing shows that she suddenly braked.
Nothing shows that she cut anyone off. She was stopped. She was lawfully in her lane.

Nothing shows that Ms. Martinez caused or contributed to this collision. She was a passenger.

The only evidence you have points one way.

— PAUSE —

That answers the first question on the charge: Was the Defendant negligent? The evidence says yes.

III. CAUSATION – DID THE NEGLIGENCE CAUSE INJURY? [5-6 min]

[Address defense arguments head-on before they can take root.]

The second question is whether that negligence caused injuries.

This is where defense arguments often drift away from real life. You heard suggestions that because there was no ambulance, because the cars were not destroyed, because the injuries were 'soft tissue,' maybe nothing serious happened.

Let me address those arguments directly.

— PAUSE —

The 'No Ambulance' Argument

The law does not require an ambulance ride to prove injury.

You heard Officer Valdez explain that when a crash report says 'no ambulance,' it means no one required emergency transport at that moment. It does not mean no one was injured.

In real life—not in movies, but in real life—people do not always know they are hurt right away. Adrenaline masks pain. Stress masks pain. The body's own response to trauma masks pain.

Later that evening, and certainly by the next morning, the pain came. That is exactly what the medical evidence shows.

— PAUSE —

The 'Low Impact' Argument

The defense suggested that the amount of vehicle damage tells you whether injuries occurred.

But you heard no medical testimony saying that. You heard no expert explaining that force does not transfer to the human body unless metal is crushed.

Cars are designed to absorb impact. Crumple zones. Bumper systems. That is good engineering.

But the human body is not designed the same way.

The force that the car absorbs still has to go somewhere. And when a vehicle is struck from behind, the people inside feel that force—even if the bumper looks fine.

— PAUSE —

The 'Soft Tissue' Argument

The law does not require broken bones. The law does not require surgery. The law does not require a dramatic injury to be real.

Soft tissue injuries—injuries to muscles, ligaments, tendons, nerves—are real injuries. They cause real pain. They require real treatment. And sometimes, they do not fully heal.

What the law requires is credible evidence. And you have it.

IV. SANTA CRUZ DE LEON SAUCEDA'S INJURIES [3-4 min]

[Humanize. Be specific.]

You heard from Ms. Saucedo.

Before this crash, she worked a physically demanding job. She had no history of lower-back problems. She was not seeing doctors. She was not taking pain medication. She was living her life.

After the crash, she began experiencing pain in her lower back. Pain that affected her ability to bend. Pain that affected her ability to lift. Pain that affected her ability to sit at work. Pain that affected her ability to sleep.

She tried to push through it. When it did not go away, she sought treatment.

— PAUSE —

She did not rush to an emergency room. She did not demand surgery. She followed the most conservative path possible.

She went to Chiro Sync, where Dr. Gosalvez provided chiropractic care. When that was not enough, she was referred for imaging at Upper Valley Radiology and Digital Views. When the pain persisted, she was referred to Texas Pain Clinic, where Dr. Saenza provided injections.

The injections helped. That matters—because it shows the pain was real and responsive to medical intervention.

When treatment became unaffordable, she stopped. Not because she was cured. Because she could not afford to continue.

That is not exaggeration. That is restraint.

V. MARTHA MARTINEZ'S INJURIES [3-4 min]

You heard from Ms. Martinez.

She was the passenger that day. She had no prior problems with her neck, her back, her hip, or her grip strength. She was working. She was functioning. She was living her life.

After the crash, she began experiencing pain in her neck, her back, and her hip. She began losing strength in her left hand. She had difficulty walking. She struggled to do the work she had done for years.

Her treatment followed the same path—conservative care first at Chiro Sync with Dr. Gosalvez, then imaging, then pain management at Texas Pain Clinic with Dr. Saenza. Injections. Therapy.

The injections helped. When the pain returned, she sought care again—not to build a lawsuit, but to function.

— PAUSE —

Credibility

Neither Plaintiff could tell you at trial how much their treatment cost at the time they received it. They were not thinking about numbers. They were thinking about getting through the day.

That is not what fake injuries look like.

Fake injuries come with memorized numbers. Fake injuries come with rehearsed stories. Fake injuries come with exaggeration.

What you heard from these two women was the truth. Imperfect. Uncertain at times. Human. Real.

VI. DAMAGES – THE NUMBERS [4-5 min]

[This is where you anchor the jury to specific figures.]

Now let me talk about damages.

Money damages are not a reward. They are not a bonus. They are not a lottery prize. They are the only tool the law gives you to address medical expenses, physical pain, and the disruption of daily life caused by someone else's negligence.

You are not being asked to punish the Defendant. You are not being asked to send a message. You are being asked to make things right—as best the law allows.

— PAUSE —

Past Medical Expenses – Santa Cruz De Leon Saucedo

Ms. Saucedo's medical bills total \$16,540.

That includes \$7,815 at Chiro Sync for chiropractic treatment.

\$5,275 at Texas Pain Clinic for pain management and injections.

\$2,500 at Upper Valley Radiology for imaging.

\$950 at Digital Views for diagnostic imaging.

Those services were rendered. They were reasonable. They were necessary. Those numbers are not guesses. They are documented.

— PAUSE —

Past Medical Expenses – Martha Martinez

Ms. Martinez's medical bills total \$20,465.

That includes \$7,590 at Chiro Sync.

\$6,925 at Texas Pain Clinic.

\$5,000 at Upper Valley Radiology.

\$950 at Digital Views.

Again—documented treatment. Real services. Real expenses.

— PAUSE —

Combined Medical Expenses

Together, the past medical expenses for both Plaintiffs total \$37,005.

That is the floor. That is what has already been spent to treat the injuries the Defendant caused. The law says they are entitled to recover that.

VII. PAIN, SUFFERING, AND MENTAL ANGUISH [3-4 min]

[No formula. Give them permission to value pain.]

For physical pain and mental anguish, there is no receipt. There is no formula. The law entrusts that judgment to you.

Think about waking up with back pain that does not go away.

Think about losing grip strength in your hand and wondering whether it will come back.

Think about changing how you work, how you sleep, how you move—because of a crash you did not cause.

Think about the frustration of wanting to do something and having your body say no.

Think about the worry. The uncertainty. The loss of the life you had before.

— PAUSE —

That has value. The law says it does.

I am not going to insult your intelligence by putting a precise dollar figure on pain. That is not my job. That is yours.

But I will tell you this: whatever number you choose, it should mean something. It should reflect the reality of what these two women went through. It should be fair.

Not excessive. Not punitive. Fair.

VIII. THE JURY CHARGE – YOUR ROADMAP [2-3 min]

[Walk them through the questions they will answer.]

When you retire to deliberate, the Court will give you a charge with specific questions. Let me walk you through what you will be asked.

— PAUSE —

Question 1: Negligence

Did the negligence, if any, of Iraissy Montalvo Reyna proximately cause the occurrence in question?

The evidence says yes. She struck a stopped vehicle from behind while attempting to pass in a no-passing zone. That is negligence. Answer: Yes.

— PAUSE —

Question 2: Damages – Santa Cruz De Leon Saucedo

What sum of money would fairly and reasonably compensate Santa Cruz De Leon Saucedo for her injuries?

You will be asked to consider: past medical expenses, past physical pain and mental anguish, past physical impairment, and past loss of enjoyment of life.

The medical bills alone are \$16,540. Add to that fair compensation for the pain she endured and continues to endure.

— PAUSE —

Question 3: Damages – Martha Martinez

What sum of money would fairly and reasonably compensate Martha Martinez for her injuries?

Same categories. The medical bills are \$20,465. Add to that fair compensation for her pain, her lost grip strength, her difficulty walking, her disrupted life.

— PAUSE —

Those are the questions. The evidence gives you the answers.

IX. CONCLUSION [2-3 min]

[Bring it home. Clear. Direct. Confident.]

Ladies and gentlemen, this case is not complicated.

A driver struck a stopped vehicle from behind. Two people were hurt. They sought treatment. They followed the conservative path. They did not exaggerate. They told you the truth.

The law says that when someone's negligence causes harm, they are responsible for the consequences. Not because we want revenge. Not because we want punishment. Because that is how our system works. That is how we hold each other accountable.

— PAUSE —

Ms. Saucedo and Ms. Martinez did not ask to be in this courtroom. They did not ask to be hurt. They were stopped in their lane, minding their own business, when the Defendant's negligence changed their lives.

We ask that you return a verdict that follows the evidence, applies the law, and does justice in this case.

— PAUSE —

Not dramatic justice. Not symbolic justice. Just fair justice.

Thank you for your time, your attention, and your service.

[Sit down.]

REBUTTAL CLOSING ARGUMENT

(5-7 minutes – Adapt based on defense closing)

[Listen carefully to defense closing. Address only their strongest points. Do not repeat your entire closing.]

REBUTTAL OPENING

Ladies and gentlemen, I have just a few minutes to respond to what you heard from the defense.

— PAUSE —

IF DEFENSE ARGUED 'NO AMBULANCE'

The defense made much of the fact that no ambulance was called. But let me ask you this: How many of you have been sore the day after something happened—after a fall, after a fender bender, after lifting something wrong—even though you felt fine at first?

That is how the human body works. Pain does not always announce itself immediately. The evidence showed that these injuries developed in the hours and days after the crash. That is exactly what the medical literature describes. That is real.

— PAUSE —

IF DEFENSE ARGUED 'LOW IMPACT / MINOR DAMAGE'

The defense showed you photographs and said the damage was minor. But they did not bring you a single medical expert to say that minor damage means no injury.

You know why? Because that is not how medicine works. Cars absorb impact. Bodies feel it. The force has to go somewhere.

Dr. Gosalvez examined these patients. Dr. Saenza examined these patients. They documented real findings. They provided real treatment. The injections worked—which tells you the pain was real.

A photograph of a bumper does not tell you what happened inside the car. The medical evidence does.

— PAUSE —

IF DEFENSE ARGUED 'CHIROPRACTORS AREN'T REAL DOCTORS'

The defense suggested that chiropractic care is somehow less legitimate than other treatment.

But chiropractors are licensed healthcare providers in Texas. They are trained specifically in musculoskeletal injuries—exactly the type of injuries involved in this case.

And more importantly: Ms. Saucedo and Ms. Martinez did not stop with chiropractic care. When it was not enough, they were referred to medical doctors. They had imaging. They received injections from a pain management physician.

They followed the conservative path that responsible patients follow. That is not a weakness. That is exactly what you would want your own family to do.

— PAUSE —

IF DEFENSE ARGUED 'THEY STOPPED TREATING'

The defense pointed out that treatment stopped at some point. They want you to think that means the injuries went away.

But you heard the reason: cost. Insurance. The reality of life.

Stopping treatment because you cannot afford it is not the same as being cured. Both Plaintiffs told you they still have pain. That is the truth.

— PAUSE —

IF DEFENSE ARGUED 'NO LOST WAGES'

The defense pointed out that neither Plaintiff claimed lost wages.

That is true. And do you know what that tells you? It tells you they are not here to inflate anything. They are not here to pad the numbers. They worked through pain when they could. They did not turn every hardship into a dollar sign.

That is credibility. That is restraint. That supports their case—it does not undermine it.

— PAUSE —

REBUTTAL CLOSE

The defense wants you to find reasons to say no. They want you to focus on what is not in this case—no ambulance, no surgery, no lost wages—instead of what is in this case.

What is in this case is a rear-end collision. A police report placing fault on the Defendant. Two women with documented injuries. Four medical providers. \$37,005 in medical bills. And ongoing pain.

That is the evidence. That is what you have to work with.

— PAUSE —

We ask for a verdict that follows the evidence.

Thank you.

[Sit down.]

REFERENCE: DAMAGES SUMMARY FOR CLOSING

SANTA CRUZ DE LEON SAUCEDA

CATEGORY	AMOUNT
Chiro Sync (Dr. Gosalvez)	\$7,815.00
Texas Pain Clinic (Dr. Saenza)	\$5,275.00
Upper Valley Radiology (Dr. Martin)	\$2,500.00
Digital Views	\$950.00
TOTAL PAST MEDICAL EXPENSES	\$16,540.00
<i>Past Physical Pain and Mental Anguish</i>	<i>[Jury Discretion]</i>
<i>Past Physical Impairment</i>	<i>[Jury Discretion]</i>

MARTHA MARTINEZ

CATEGORY	AMOUNT
Chiro Sync (Dr. Gosalvez)	\$7,590.00
Texas Pain Clinic (Dr. Saenza)	\$6,925.00
Upper Valley Radiology (Dr. Martin)	\$5,000.00
Digital Views	\$950.00
TOTAL PAST MEDICAL EXPENSES	\$20,465.00
<i>Past Physical Pain and Mental Anguish</i>	<i>[Jury Discretion]</i>
<i>Past Physical Impairment</i>	<i>[Jury Discretion]</i>

COMBINED TOTALS

Total Past Medical Expenses (Both Plaintiffs): **\$37,005.00**

Total Pain, Suffering, Impairment (Both Plaintiffs): *[Jury Discretion]*

REFERENCE: KEY PHRASES FOR CLOSING

On Liability:

- "That much is not disputed."
- "The only evidence you have points one way."
- "Surprise does not change reality."
- "That is negligence in the legal sense."

On Causation:

- "The law does not require broken bones."
- "The law does not require surgery."
- "The law does not require a dramatic ambulance ride."
- "Cars absorb impact. Bodies feel it."
- "The force has to go somewhere."

On Credibility:

- "That is not what fake injuries look like."
- "That is not exaggeration. That is restraint."
- "Imperfect. Uncertain at times. Human. Real."

On Damages:

- "Money damages are not a reward. They are the only tool the law gives you."
- "That is the floor. That is what has already been spent."
- "That has value. The law says it does."
- "Whatever number you choose, it should mean something."

Closing Lines:

- "Not dramatic justice. Not symbolic justice. Just fair justice."
- "We ask for a verdict that follows the evidence."
- "That is how we hold each other accountable."