

HEINEMANN LAW FIRM

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INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

December 26, 2014

JAN -6 2015

CAMPING WORLD OF BURLINGTON
1535 Walton Drive
Burlington, WA 98233

Keystone RV Company
PO Box 2000
Goshen, IN 46527

Fax: 574-534-9057

National Highway Traffic Safety Administration
1200 New Jersey Ave. SE, Washington, DC 20590

Re: Keystone 2014 Fuzion
VIN: 4YDF33126EF [REDACTED]
Date of Sale: 05/09/2014
Dealer: Camping World of Burlington
Purchasers: [REDACTED]

PLEASE BE ADVISED that this law firm has been retained by the above named purchasers to prosecute their warranty and related claims related to the defective trailer which was delivered to them in May of this year. Said trailer has defects which purchasers believe substantially impair the value of the unit and which could cause a crash or could cause injury and death. The trailer currently is in the custody of Camping World in Burlington, Washington.

This Warranty claim falls within the one year Warranty period provided for in writing by the manufacturer (Keystone). The Warranty provides Keystone with an opportunity to cure the defects within a reasonable period of time, if cures are possible. If not, Keystone is obligated to provide a replacement unit, which in this case would be a new trailer of like kind and value.

Although Washington law acknowledges the seller's right to cure a defect, said law does not require the purchaser to accept a repaired unit when the safety of the unit is in question and could lead to bodily injury or death to the purchaser. When the purchasers brought the unit to

NM
1715
SMD

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the dealer the service department advised the purchasers that they were lucky the unit did not come apart causing serious damage or injury and further stated that the unit could not leave the repair shop as it was unsafe to haul on the road.

Attached as Exhibit A is a list of "known" defects existing in the unit at this time. In all likelihood the chassis of the unit has been torqued or otherwise compromised as is evidenced by the shattering of one of the big windows, misalignment of doors and the left axle misalignment, just to mention a few problems. The excessive vibration caused by the failure of the spring assembly and leaf springs has compromised the entire unit and made it unsafe.

Attached as Exhibit B are pictures of some of the major defects.

If it is the intent of Keystone/Burlington to simply insert new leaf springs and spring assemblies this is not acceptable because what you would then be delivering to purchasers is a product far inferior to the product you represented you would deliver at the time of the sale. Purchasers are entitled to be put in as good of position as if you had delivered a non-defective product.

Further, the purchasers are afraid to tow this unit due to the risk of damage and harm they could sustain by a second failure.

In searching the web, we note that leaf spring failures are not new to these units. This is something you were all aware of at the time you sold this unit to purchasers and you failed to disclose this information to them.

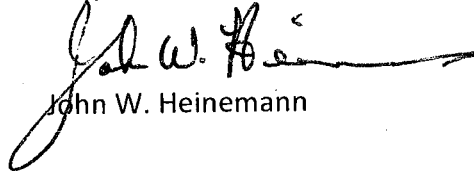
Any cure by you would require you take this unit apart down to the frame and make all necessary repairs. Otherwise, the value of this unit from a monetary standpoint to my clients would be drastically reduced as they would have to disclose this problem to any subsequent purchaser and further, when towing same they would be subject to the constant stress of worry over the structural integrity of the unit and the risk of harm they were being subjected to.

The prudent thing to do would be to make a full refund of the purchase price to our clients or reach agreement with them on another new unit acceptable to them at the same price and on the same terms as in the above sale.

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Please advise as to what actions you will take in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "John W. Heinemann", with a long horizontal flourish extending to the right.

John W. Heinemann

cc: Clients

Exhibit "A"

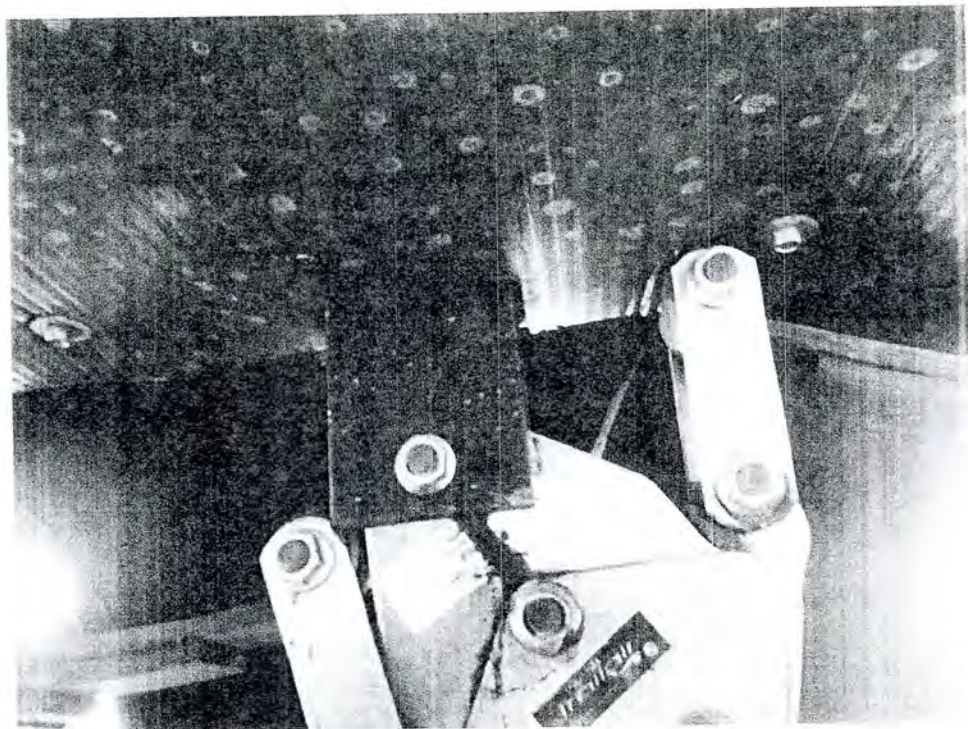
Issues with camper

- 1 leaf springs cracked and broken
- 2 main window shattered
- 3 skirting
- 4 brackets for skirting broken
- 5 brackets for waste water broken
- 6 screws missing and loose from skirting and corner post
- 7 nails coming loose at moldings
- 8 window seals falling out
- 9 sliding glass door frame out of square (not originally)
- 10 electric cover plate fell off
- 11 central vacuum system stopped working
- 12 fireplace stopped working
- 13 sound bar support bracket broken

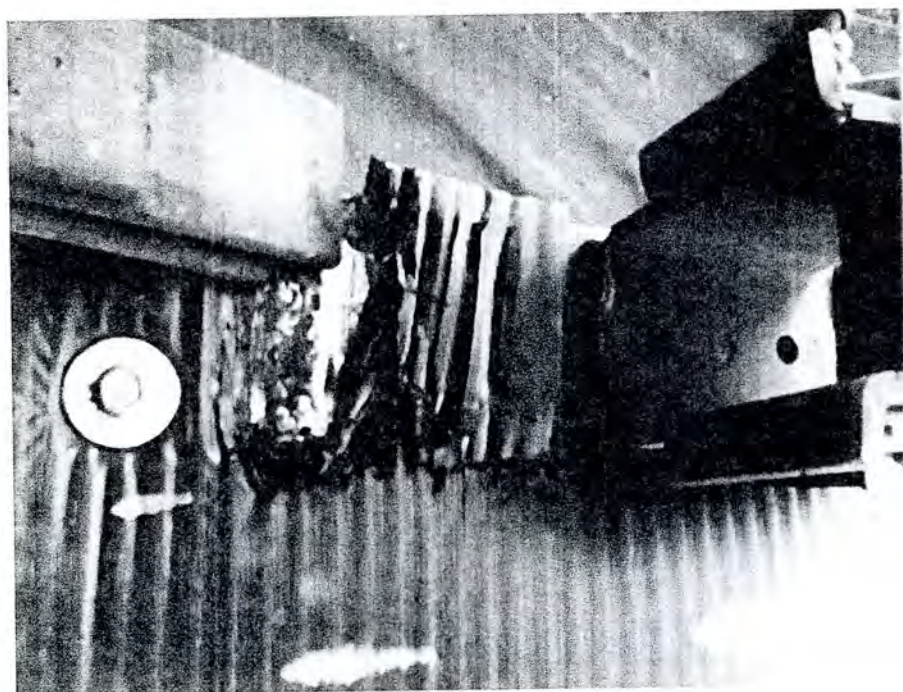
Exhibit "B"



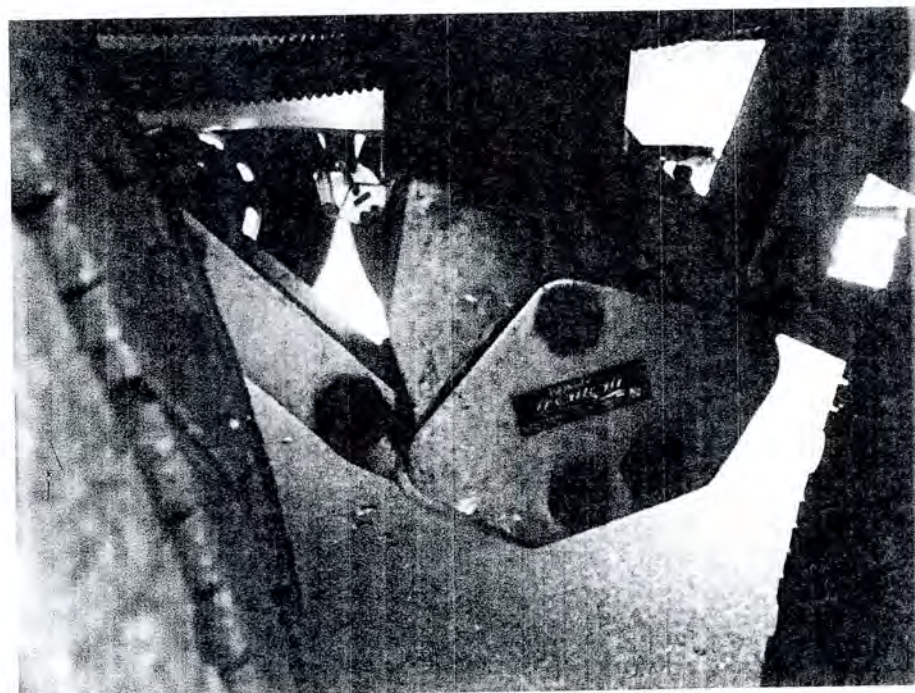
LEFT REAR SPRING BROKEN



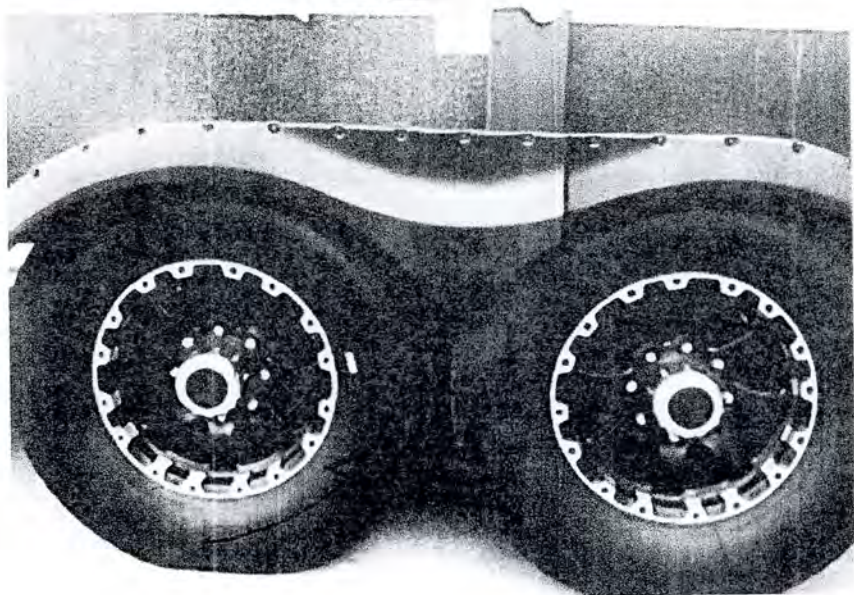
RIGHT REAR SPRING



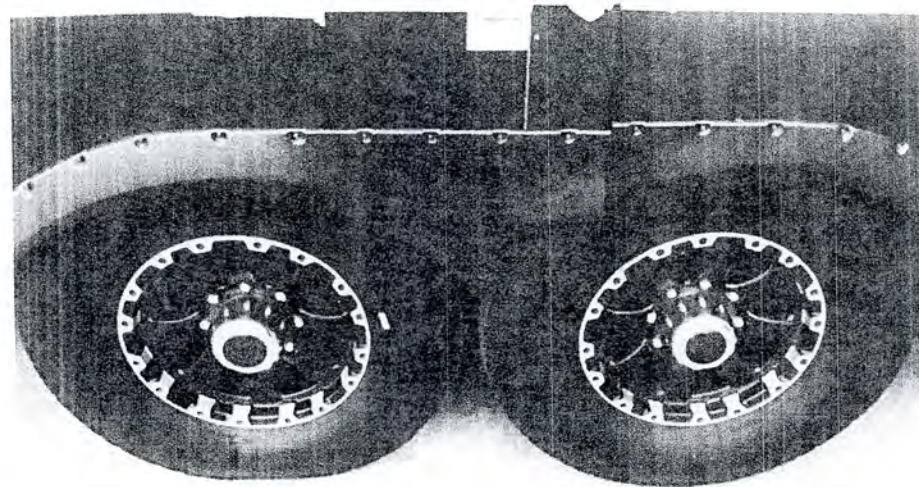
SPRING RESTING ON FRAME



RIGHT REAR SPRING ASSEMBLY



①

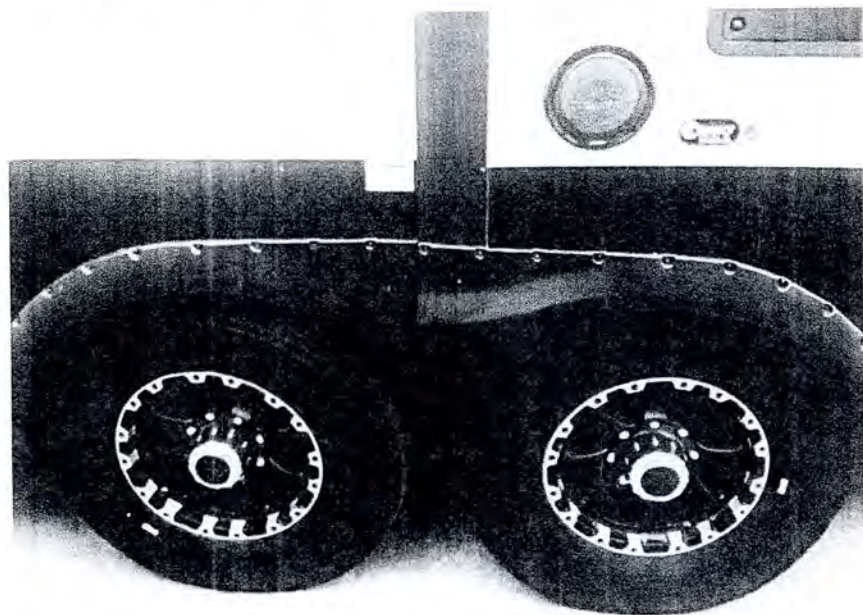


②

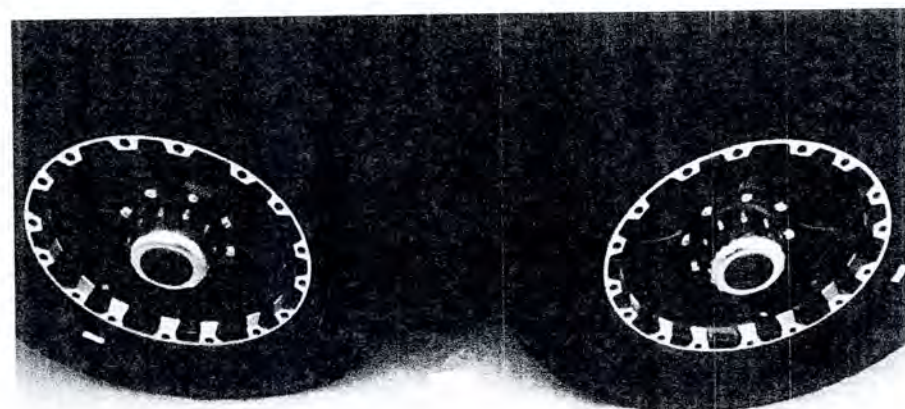
LEFT REAR AXUS LOSE



MOVED FORWARD

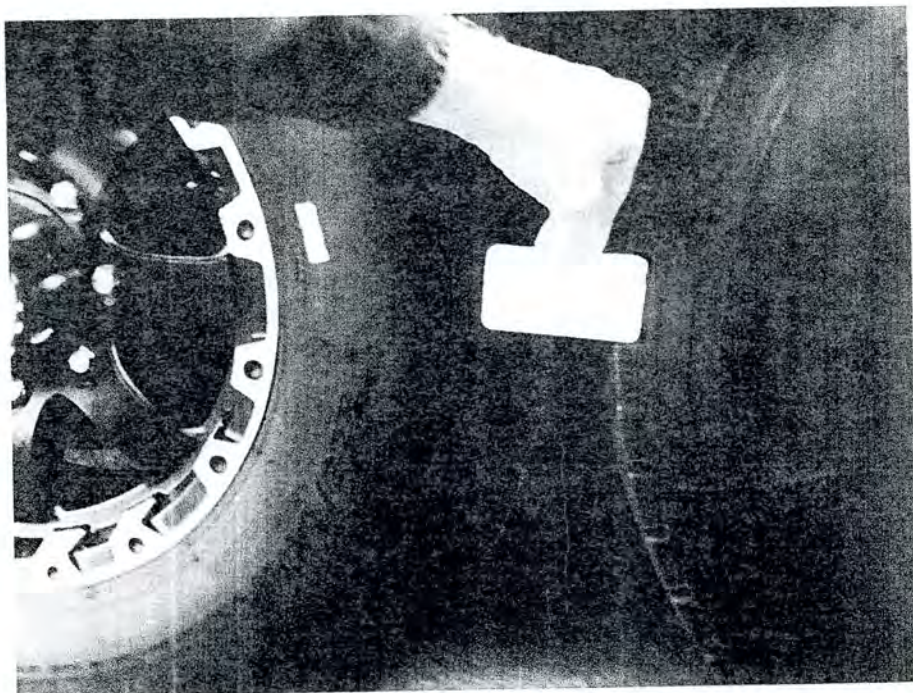


③

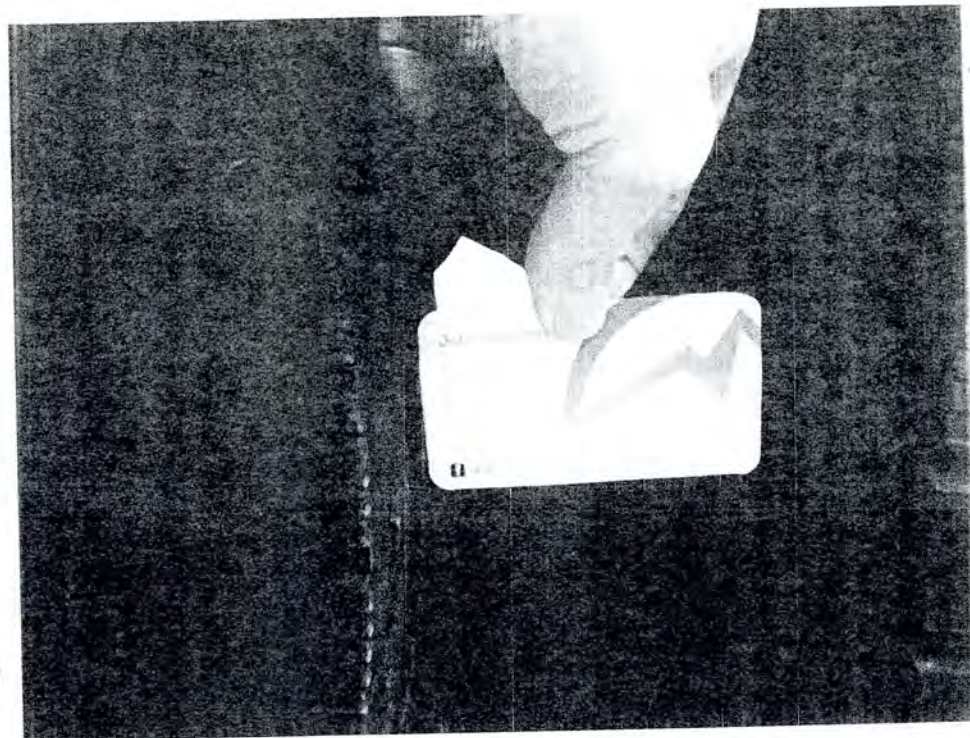


RIGHT SIDE COMPARASONE

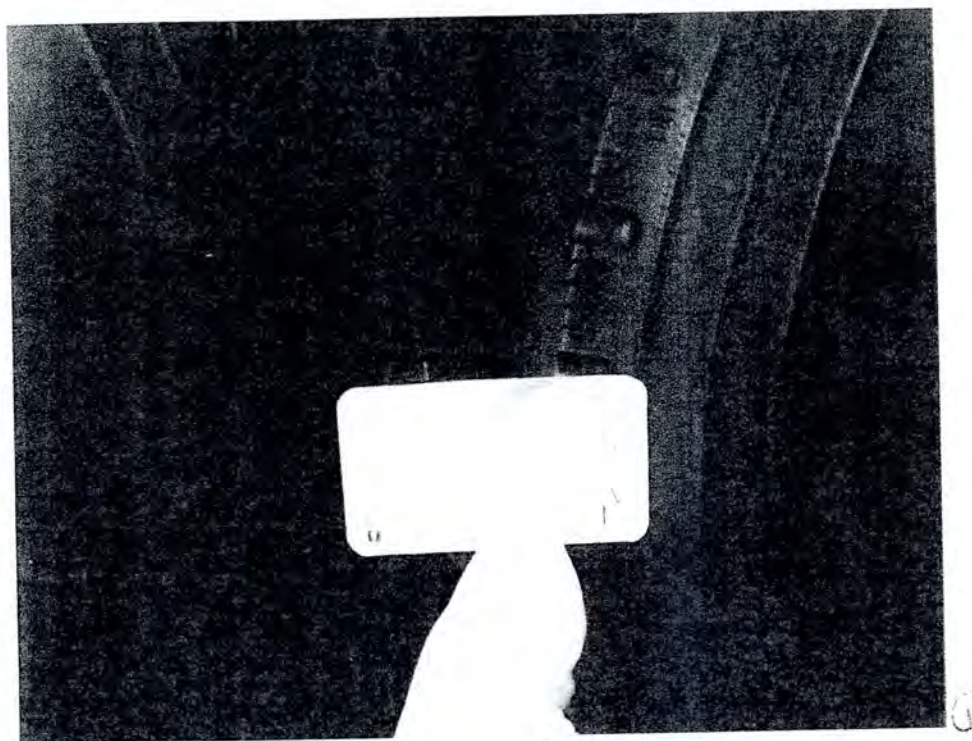




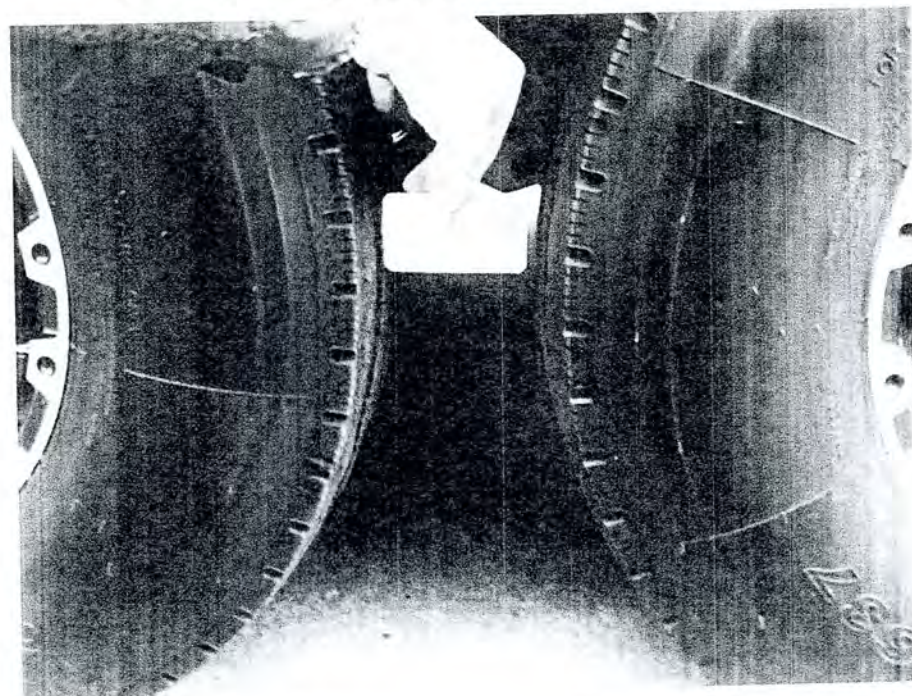
LEFT REAR AXLE



RIGHT REAR AXLE



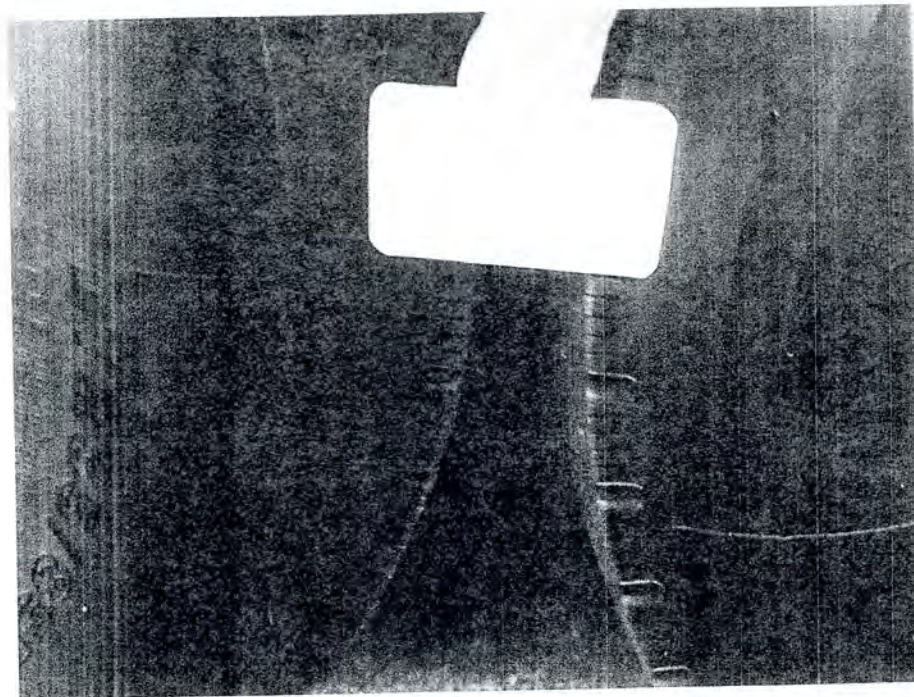
≈ 1" APART (LEFT)



≈ 2 3/4" APART (RIGHT)

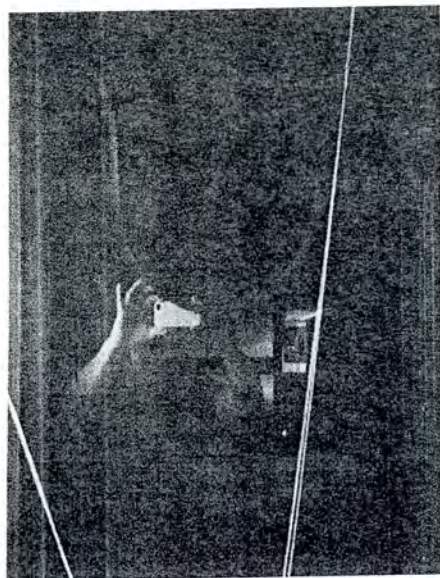


LEFT AXLE NOT
LINED UP

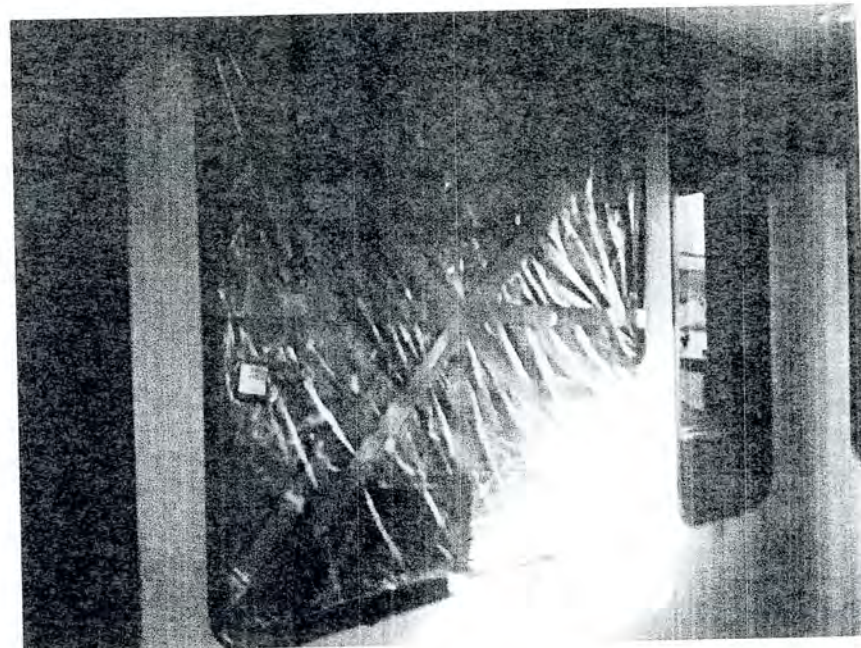
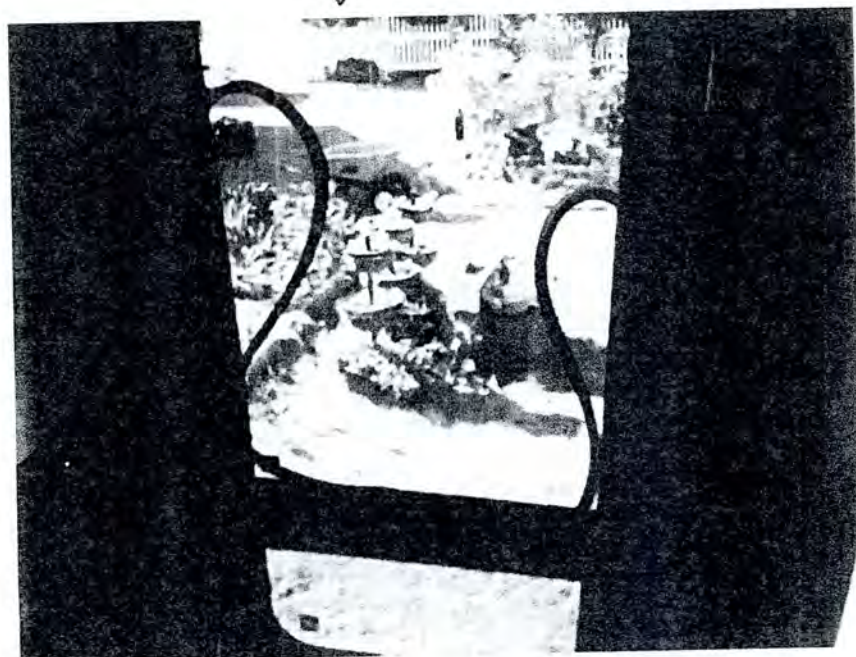


LEFT AXLE
CLOSE UP

①

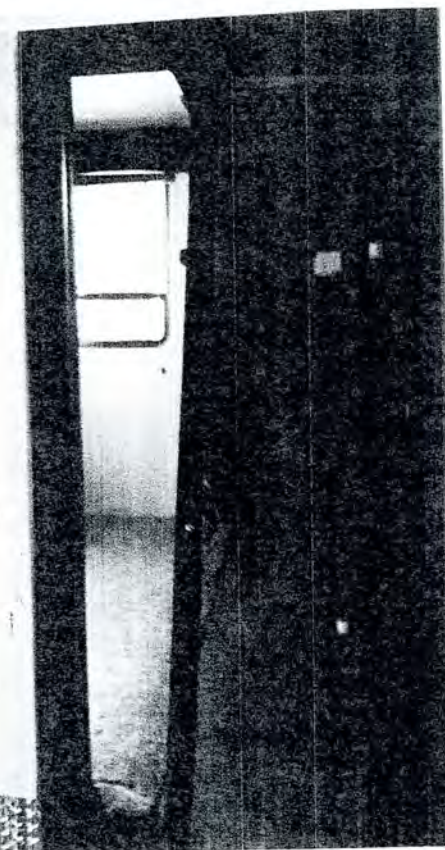


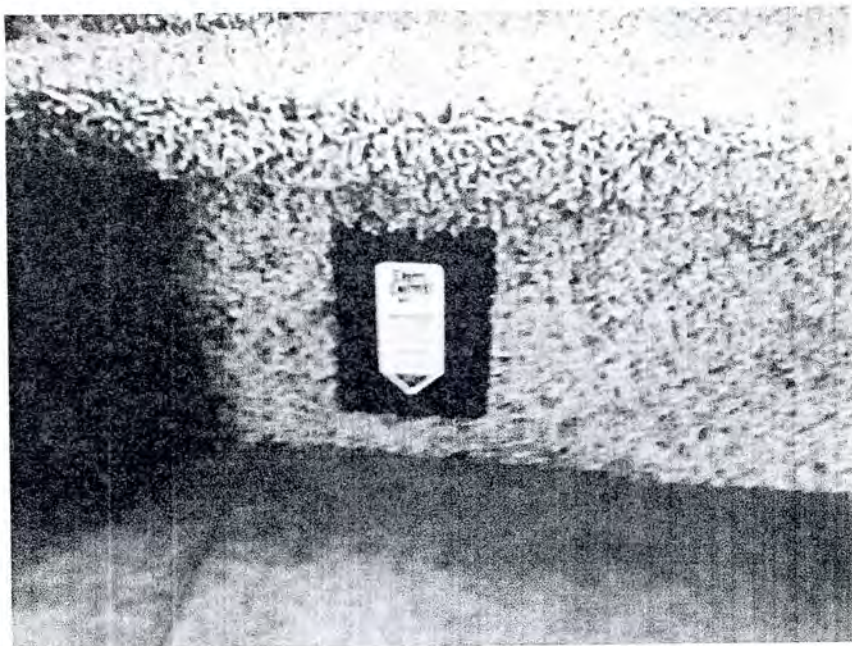
WINDOW ↑ SEALS FAILING OUT
IN MULTIPLE WINDOWS



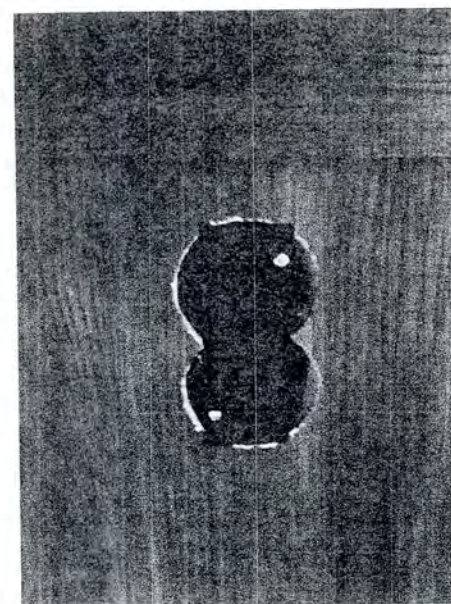
↗ MAIN
WINDOW
BLOW OUT

DOOR DOES
NOT →
ALIGN
ANYMORE

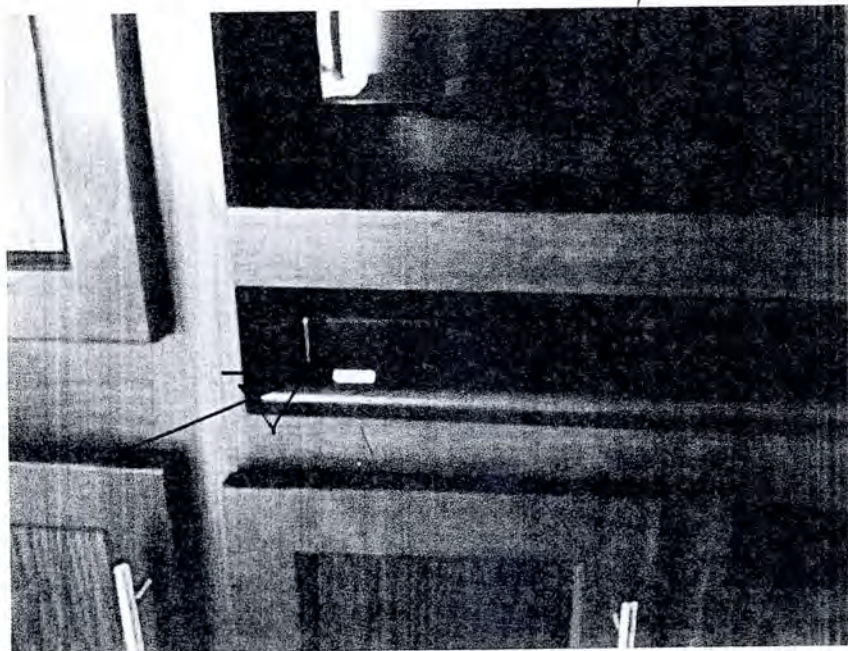




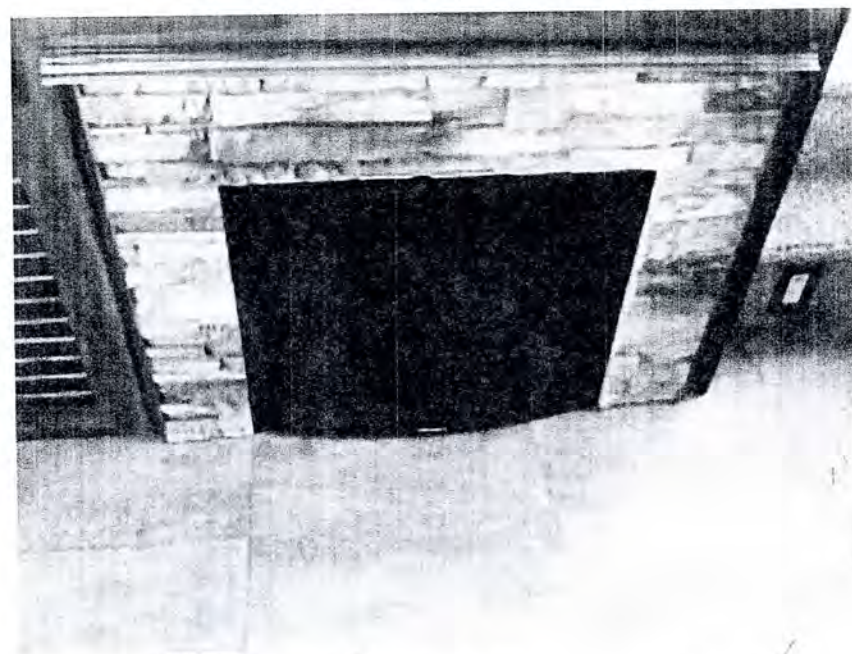
VACUUM SYSTEM INOP./BROKEN



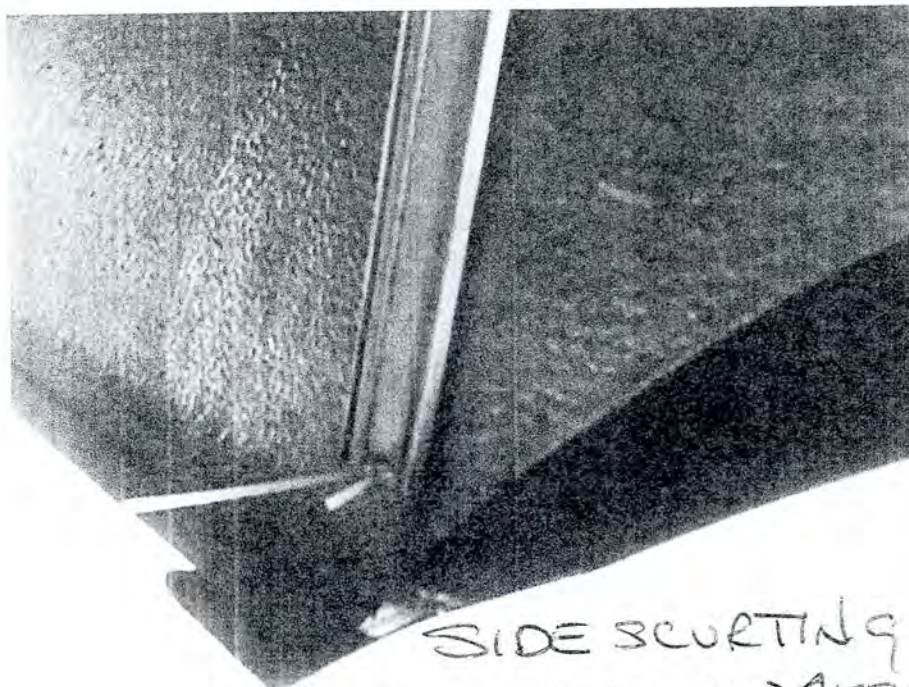
COVER PLATE
FELL OFF



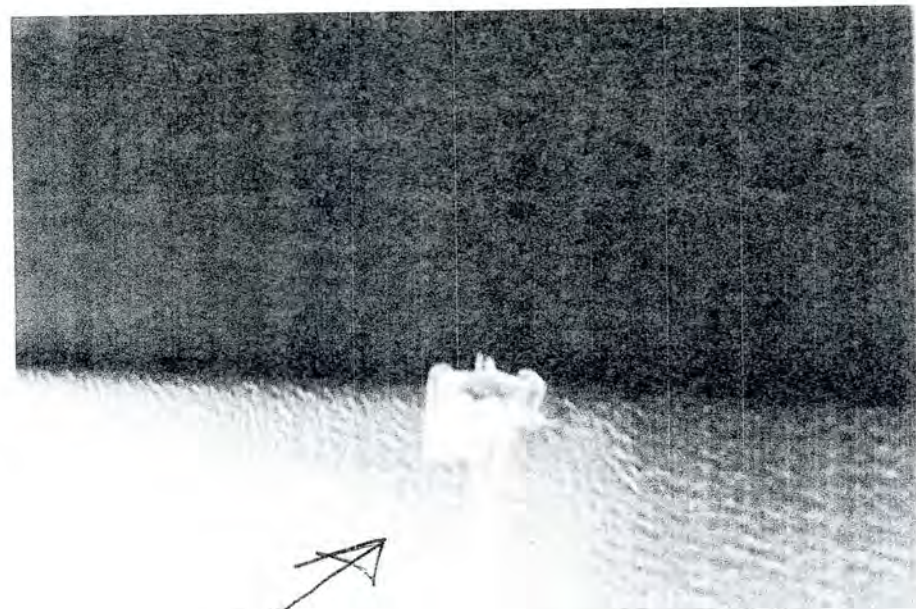
SOUND BAR SUPPORT BRACKET
REMOVED



FIRE PLACE INOP./BROKEN

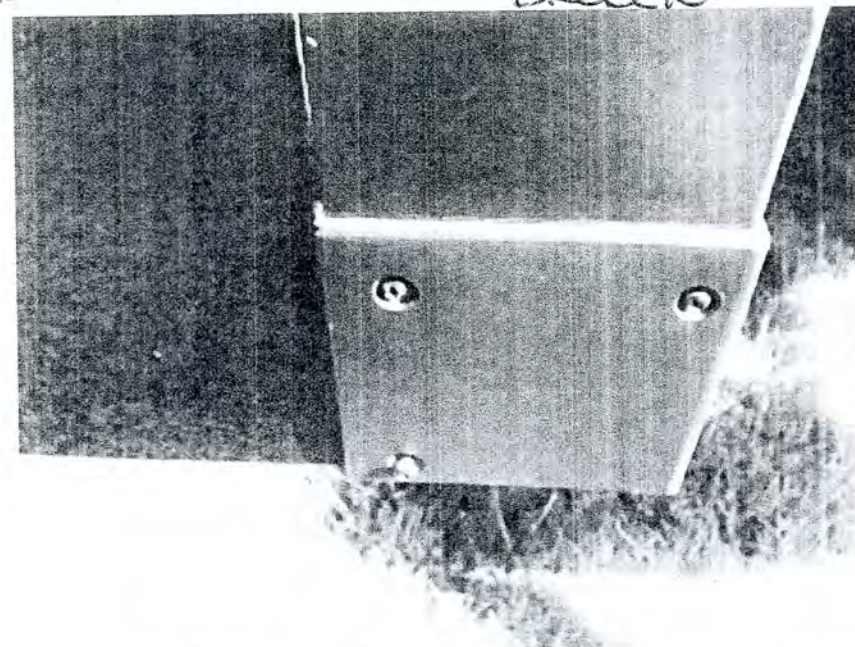
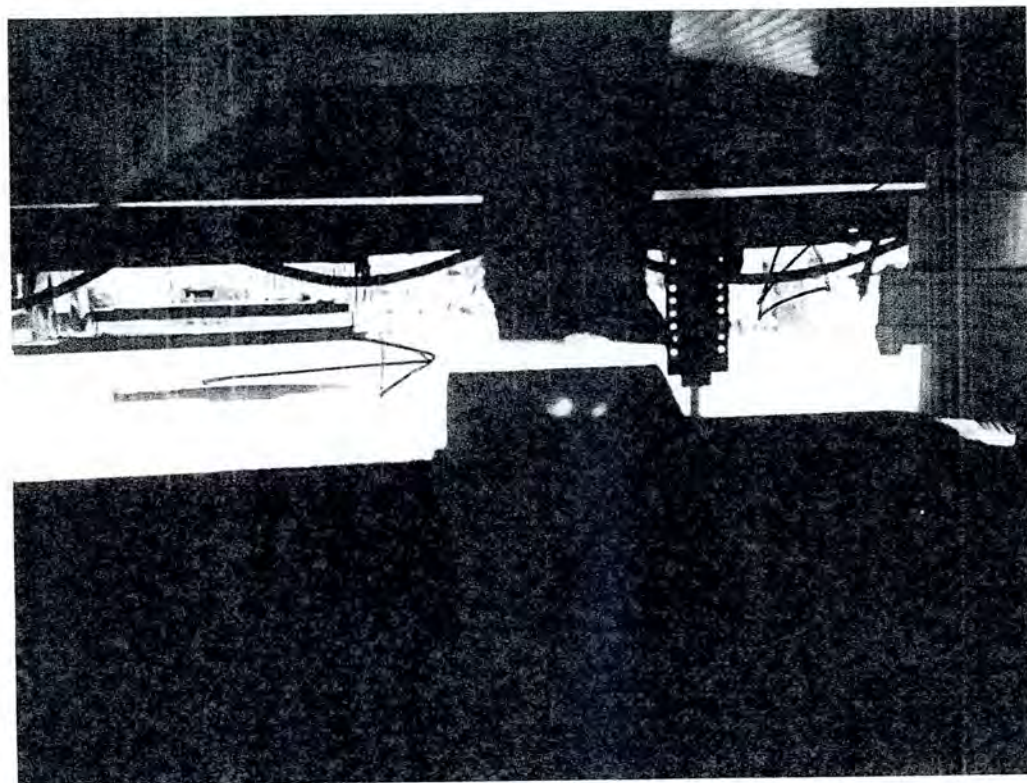


SIDE SCURTING
LOOSE, SCREWS MISSING



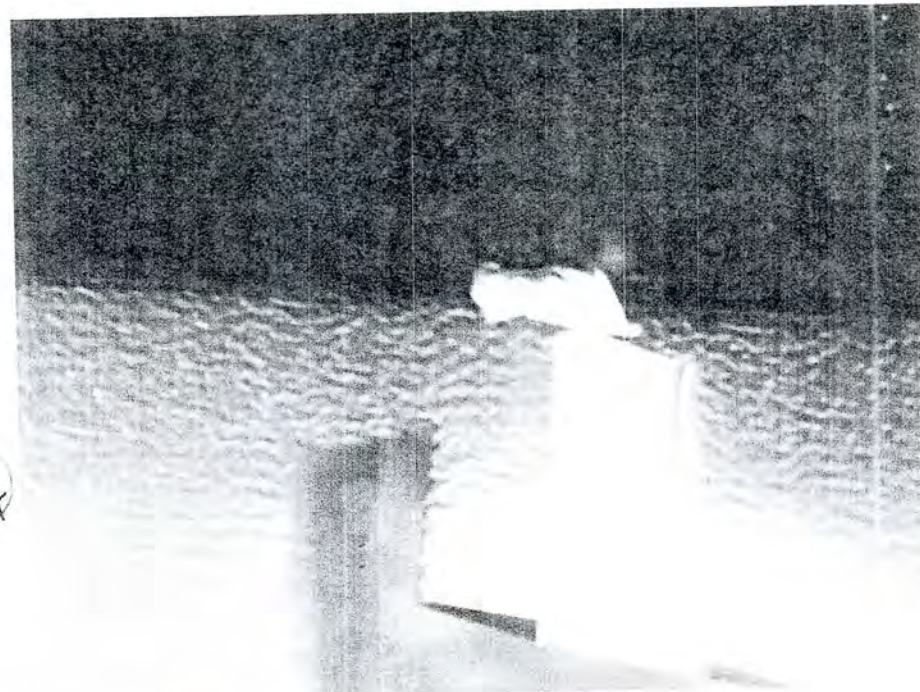
BRACKETS BROKEN

GREY WATER SUPPORT BRACKET
BROKEN

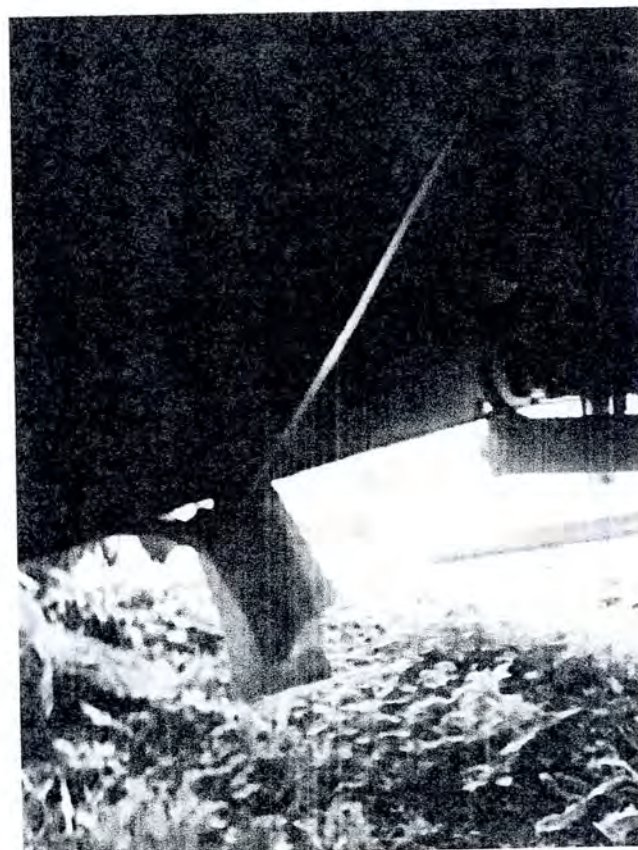


SCREWS COMING LOOSE

BRACKETS
BROKEN
FOR SIDE
PANEL



INTERIOR MOLDING
↑
NAILS COMING
OUT, LOOSE



BRACKETS
LOOSE

④

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