

**Baxley, Pratt & Wells, P.A.**

*Attorneys at Law*

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(1929-1999)

CL-11244679-4550

July 30, 2019

Brown's RV Super Store  
30049 Hwy 151  
McBee, SC 29101

Fleetwood RV  
Owner Relations  
P.O. Box 1007  
Decatur, IN 46733

Dear Sirs:

I have been retained to represent [REDACTED] and [REDACTED] in regard to the purchase of 2019 Fleetwood Flair Motor Home from Brown's RV & Campers, Inc. on March 29, 2019. Attached to this letter are thirty-one (31) defects in the motor home which must be fixed under the manufacturer's warranty and the Warranty Forever service contract purchased by [REDACTED] when she purchased the vehicle. The most serious defects are related to the battery and electrical systems of the vehicle and the motor home part causing the drive train battery and the house batteries to go dead frequently. Neither the drive train battery, nor the house batteries will hold a charge. The generator also fails on a constant basis.

The electrical system problems, especially the intense heat produced by the converter from AC power to DC power pose a safety risk for all occupants of the RV.

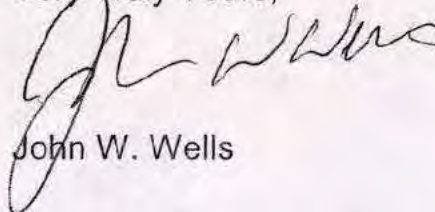
To remedy the problems, I propose that Brown's RV provide me with a time and date within the next ten (10) days when [REDACTED] and [REDACTED] can deliver the 2019 Motor Home to the lot for repair. Because Brown's RV has already attempted to repair this vehicle without success, I believe that a manufacturer's representative will need to participate in the repair of this vehicle. If the vehicle cannot be repaired so that it is safe to use, then I propose that we revoke acceptance, and that the purchase price of One Hundred Five Thousand and 00/100 (\$105,000.00) dollars be refunded. Please contact me and give me a

TG  
8.14.19  
WD



time and date when the vehicle can be delivered to a repair facility.

Very Truly Yours,



John W. Wells

Co [REDACTED] and [REDACTED] Camden, SC [REDACTED]  
National Highway Traffic Safety Administration, 1200 New Jersey Ave SE, Washington, DC 20590

### DEFECTS

1. Chassis Battery on engine goes dead-jump started two (2) times in three (3) weeks.
2. House Batteries on RV Side go dead in hours-was plugged up at KOA in Las Vegas,  
Drove 1.6 miles to get oil changed at RV Dealership-Turned off generator, they changed  
the oil, within three (3) hours everything was dead.
3. Back-up Camera-Inoperative-moisture in it-only works if dried out
4. Right front storage door comes open going down road. If you hit a bump going down the  
road, door will come open even if it has been locked.
5. Right Side Storage Bin-below freshwater inlet leaks-rust mark still there inside door.
6. Right Rear Storage Bin leaks water into it also.
7. Left Slide Out-Inoperative-Brand New, they knew it. All seven (7) of these were written  
up on the Monday after we purchased on Thursday of week before. Kept Unit six (6)  
weeks and Did Not Touch. Called to pick up unit, said they had another RV doing the

same thing, Tech said keep it plugged in. They had to jump start the RV before we could leave the dealership repair facility been moved only hours. They gave us a unit they knew had Electrical Issues.

8. Water leaking inside at water storage area, Raised Bed-Repaired pipe from water tank on inside of RV-Clamp was not tight.
9. Water Storage Line also leaking outside-No check valve in line, leaking going down the road into compartment below.
10. Floor ripped up from slide out being inoperative and hard to move.
11. Emergency Breaker trips when you try to use it for the Refrigerator.
12. Convertor gets extremely hot and trips the breaker-nothing works, safety issue.
13. Generator quit at 211 miles on a trip. It quit everyday while driving, could not use in Utah and Arizona-dry camping, everything goes dead. Generator quit at least 3 to 4 times every day.
14. Dash on RV is coming apart in front.
15. Top Kitchen drawer will not close.
16. Left Rear storage compartment comes open going down the road.
17. Drawer under seat behind driver comes off-needs hinges on screw set, falling off, have tightened up twice, needs attention.
18. Letters on front of Motor Home spelling "Fleetwood Flair" are coming off, the letter A came off the first day out, the I and R are peeling up.
19. Front brakes squealed the whole trip.



20. Right Hood Latch-Inoperative, was repaired at RV shop when having the oil changed in Las Vegas.

21. Moulding, on wall coming apart in front of unit

22. Knobs in both bathrooms that hold doors open, came apart going down the road

23. Toilet in hallway bath, never worked and will not hold water.

24. Toilet in hallway bath allows fumes from holding tank to leak in unit. Unit smells bad.

Stopped at Dollar General in Tennessee, the second day and got shower stopper about six (6") inches round and put over a toilet drain and then towels to stop smell and fumes.

25. Black Tank gauge was like everything else reads zero-doesn't work at all.

26. Moulding on side of bed came off, broken and flopping

27. Back Bathroom cabinet coming apart from wall.

28. A/C condensation leaks on the inside on right side passenger.

29. Door rack on wall is loose.

30. Rear Stabilizer arm hanging down, clamps halfway off.

31. Screws are out from window frame above recliner, everything is loose.

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**BAXLEY, PRATT & WELLS, P.A.**

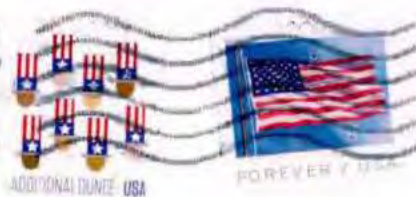
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National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE  
Washington, DC 20590

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