[redacted]

[redacted]
Charlotte, NC [redacted]

February 23, 2024

National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: Multiple failures of Ford engines 7.3L V8 350hp, aka "Godzilla engine"

To Whom It May Concern:

There has been a string of catastrophic failures in the Ford engine listed above. I have attached a copy of my letter to the manufacturer pointing out these defects and documenting my claim. I would appreciate it if you investigated this matter further as these defects appear to be known in the industry.

Sincerely,

[redacted]
President

Enclosure: Our letter to Ford Consumer Affairs, dated February 23, 2024

[redacted]

[redacted]
Charlotte, NC[redacted]
[redacted]
[redacted]

February 23, 2024

Ford Consumer Affairs
P.O. Box 6248
Dearborn, MI 48126

RE: Multiple failures of Ford engines 7.3L V8 350hp, aka "Godzilla engine"

To Whom It May Concern:

We operate a fleet of eleven Ford trucks, model year ***2021 or newer***, with the "Godzilla engine" listed above. ***Five of those engines had catastrophic failures and had to be replaced over the last 11 months*** (see Table 1).

Ford advertised this engine to feature "maximum durability in the harshest environment." However, in reality this engine type is known for its unreliability and early catastrophic failures like the ones we have experienced and documented, according to my conversations with employees of the local Ford dealerships and independent mechanics. How can engines touted to last 300,000 to 400,000 break so early and regularly?

It is our opinion that the frequency and magnitude of these engine failures strongly suggest that ***a manufacturer recall is warranted for these engines.*** This is the second time that we bring this manufacturer defect to your attention. In fact, ***we even asked you for assistonce to avoid another catastrophic engine failure in two of vehicles that have failed since*** (VINs 1F65FSKNSMO[redacted] and 1FDWE3FN8MD[redacted]).

Based on the evidence of manufacturer defects presented in this letter I respectfully request that Ford

1. Refund the actual expenses we incurred to rebuild and replace three of the five engines listed in Table 1.
    - **Requested reimbursement: $27,900.53 (see Exhibits 1, 3a+b, 5).**
2. Refund <u>all</u> reasonable vehicle rental fees we incurred during the repair or replacement of these engines.
3. Investigate the repeated and early failures of this engine.
4. **Propose an action plan to avoid failures of this engine in our remaining vehicles listed on Table 2.**

[redacted]

[redacted]
Charlotte, NC [redacted]
[redacted]
[redacted]

The enclosed evidence speaks for itself. We cannot be held liable for these manufacturer defects, nor can we afford six more catastrophic engine failures in our fleet. I appreciate your prompt attention to this urgent matter and look forward to your favorable response. Please do not hesitate to reach out to me if you need additional information.

Sincerely,

[redacted]
President

cc: **National Highway Traffic Safety Administration**
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Table 1

Date of completion	Odometer	VIN	Engine issue	Cost	Ford Case No.
03/07/2023	76,035	1FDWE3FN1MD[redacted] 2021 Ford E350	Engine replacement (Camshaft and lifter failure)	**$11,449.64** (see Exhibit 1)	
05/12/2023	45,745	1F65F5KNXM0[redacted] 2021 Ford F59	Engine replacement (Camshaft and lifter failure)	Warranty (see Exhibit 2a+2b)	[redacted]
05/16/2023	83,575	1FDWE3FN5MD[redacted] 2021 Ford E350	Engine rebuild and subsequent engine replacement (Camshaft and lifter failure)	**$6,450.89** rebuild (see Exhibit 3a-3d); subsequent engine replacement done under warranty	[redacted]
10/27/2023	66,608	1F65FSKNSMO[redacted] 2021 Ford F750	Engine replacement (Camshaft and lifter failure)	Warranty (see Exhibit 4a-4c)	[redacted]
01/24/2024	103,177	1FDWE3FN8MD[redacted] 2021 Ford E350	Engine replacement (Camshaft and lifter failure)	**$10,000.00** (see Exhibit 5)	

Table 2

Additional Ford vehicles owned by [redacted]. running the same failure prone Godzilla engine:

VIN	Year	Model
1FC4E4KN2MD[redacted]	2021	E450 C-Van
1FC3E3KNXND[redacted]	2022	E-Series Van
1F65F5KN6M0[redacted]	2021	F59 Co- Box Truck
1F65F5KN6M0[redacted]	2021	F59 Co- Box Truck
1F65F5KN6M0[redacted]	2021	F59 Co- Box Truck
1FDWE3FK9MD[redacted]	2021	E350 Super Duty Cutaway

Exhibit 1

MOBILE OIL MASTERS

8595 PELHAM ROAD STE 400 #314
GREENVILLE , SC. 29615
(864) 630-2272

INVOICE #9217

admin@mobileoilmasters.com
www.mobileoilmasters.com

CUSTOMER: [redacted]		YEAR:	2021	SITE	NO DATA/RWD
[redacted] SPARTANBURG, SC. [redacted]		MAKE/MODEL:	FORD ECONOLINE E-350	LICENSE/STATE:	[redacted]
Cell: [redacted]		VIN:	1FDWE3FN1MD[redacted]	[redacted]	6035/76035
		ENGINE:	7.3LV8 OHV 16V	Fleet Number	[redacted]

In: 11/2/2022 Out: 2/28/2023 DRIVER NAME PHONE NUMBER Tire size 225/75/16 115/112 preferred tire number Email:

VEHICLE ISSUE #1: REPLACE ENGINE				
TECH REPORT: WORK COMPLETED BY DAN				
PART: ENGINE	ENGINE	1 @ $7,499.99	$7,499.99	NEW
LABOR: JACOBS,	ENGINE, R&R, E-450 SUPER DUTY		$3,499.65	LABOR
			Total for "REPLACE ENGINE":	$10,999.64

Recommended Repairs:	Labor/Jobs	$3,499.65
	Parts	$7,499.99
	Sublet	$0.00
	Total Fees	$0.00
	Subtotal	$10,999.64
	Tax @ 6%	$450.00
	Total	$11,449.64
	Payments	$0.00
	Balance	$11,449.64

Replaced parts may be requested by customer. I hereby authorize the above repair work to be done along with all necessary materials. You and your employees may operate the above vehicle for the purposes of testing, inspection or delivery at my risk. An express mechanic's lien is acknowledged on the above vehicle to secure the amount of repairs thereto. The shop will not be held responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft, accident or any other cause beyond your control. In the event legal action is necessary to enforce this contract, I understand that I am solely responsible for all costs including attorney's fees and court costs. I have read the above and acknowledge receipt of an estimate.

X_____ Date 3/7/2023

Exhibit 2a

CUSTOMER #: [redacted]

[redacted]

469751

856456

INVOICE

PAGE 1

FAIRWAY
LINCOLN Ford SUBARU
2323 Laurens Road, Greenville, South Carolina 29607
(864) 242-5060 Fax (864) 242-2251
www.fairwayauto.com

HOME:
BUS:
CONT: [redacted]
CELL: [redacted]

SERVICE ADVISOR: 856 RAY GOWAN

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/ OUT	TAG
	21	FORD F59	1F65F5KNXM[redacted]		46087/46087	[redacted]

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
22SEP21 DE	19APR21		17:30 17MAR23		0.00	CASH	12MAY23

R.O. OPENED	READY	OPTIONS: SOLD-STK:V625 DLR:009775 ENG:99N 7.3L 2V DEVCT NA PFI V8 GAS TRN:44P 6 SPEED AUTOMATIC TRANS
16:37 17MAR23	09:39 12MAY23	

LINE OPCODE TECH TYPE HOURS		LIST	NET	TOTAL
A CUSTOMER STATES CHECK ENGINE LIGHT IS ON				
31 ENGINE PERFORMANCE/REPAIR				
7074 CPFT			0.00	0.00
1 F2GZ*6766*A CAP ASY - OIL FILLER		12.98	12.98	12.98
46087 REPAIRED ON LINE B				
**********				
B CUSTOMER STATES ENGINE IS MAKING NOISE AND TRUCK RUNS VERY ROUGH				
CAUSE: .				
31 ENGINE PERFORMANCE/REPAIR				
7074 WF40				(N/C)
1 LC3Z*6006*B SERVICE ENGINE ASY				(N/C)
2 VC*13*G ANTI-FREEZE				(N/C)
2 LC2Z*9448*A GASKET				(N/C)
8 AL3Z*6379*BA BOLT - HEX.HEAD				(N/C)
8 LC3Z*9439*A GASKET - INTAKE MANIFOLD				(N/C)
16 *W714870*S430 NUT				(N/C)
4 *W520514*S440 NUT - HEX.				(N/C)
4 *W714656*S439 BOLT				(N/C)
2 *W719575*S900 BOLT				(N/C)
2 *W709771*S440 NUT - ADJUSTING SCREW				(N/C)
4 *W715618*S437 NUT				(N/C)
2 *W715106*S439 BOLT				(N/C)
2 *W712861*S439 BOLT				(N/C)
6 *W711336*S441 NUT				(N/C)
FC: PART#: COUNT:				
CLAIM TYPE:				
AUTH CODE:				
7074				
46087 VERIFIED CONCERN. CHECKED AND FOUND THAT TRUCK HAD LOW COMPRESSION. DISASSEMBLED ENGINE AND PERFORMED COST CAP. REPLACED ENGINE AS DIRECTED BY FORD COST CAP TOOL.				
**********				
C PERFORM MULTI-POINT INSPECTION				
CAUSE: MULTI-POINT INSP				

Parked on fence line on backside of shop

Engine replacement

I hereby authorize the repair work hereinafter set forth to be done along with the necessary material and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car or truck to secure the amount of repairs thereto. Dealership is not responsible for loss of or damage to the above vehicle, or articles left therein, in case of fire, theft, or other cause beyond our control. All payments are due upon completion of repairs. Repair work done on this order will be based in part upon a flat rate manual computation. TERMS: STRICTLY CASH

Any dispute, claim, or controversy arising out of any service (labor or material) provided at customer's request shall be decided by binding, bilateral arbitration under the Federal Arbitration Act. To the extent that the South Carolina Court Annexed Alternative Dispute Resolution (ADR) Rules can be applied to binding arbitration, the parties and the arbitration shall be guided by the processes of the ADR rules.

X

RETAIN THIS COPY AS YOUR RECEIPT. PLEASE KEEP THIS COPY FOR YOUR WARRANTY COVERAGE.

SERVICE HOURS
MON. - FRI. 7:30 AM TO 6:00 PM
SAT. 8:00 AM TO 2:00 PM

ALL PARTS ARE NEW UNLESS OTHERWISE SPECIFIED BY TERMS AND CONDITIONS OF YOUR WARRANTY

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

CUSTOMER

Exhibit 25

CUSTOMER #: [redacted]

[redacted]

[redacted]

INVOICE

PAGE 2

FAIRWAY
LINCOLN Ford SUBARU
2323 Laurens Road, Greenville, South Carolina 29607
(864) 242-5060 Fax (864) 242-2251
www.fairwayauto.com

HOME:
BUS:
CONT: [redacted]
CELL:

SERVICE ADVISOR: 856 RAY GOWAN

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/ OUT	TAG
	21	FORD F59	1F65F5KNXM[redacted]		46087/46087	[redacted]

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
22SEP21 DD	19APR21		17:30 17MAR23		0.00	CASH	12MAY23

R.O. OPENED	READY	OPTIONS: SOLD-STK:V625 DLR:009775 ENG:99N 7.3L 2V DEVCT NA PFI V8 GAS TRN:44P 6 SPEED AUTOMATIC TRANS
16:37 17MAR23	09:39 12MAY23	

LINE	OPCODE	TECH	TYPE	HOURS		LIST	NET	TOTAL
	99P				PERFORM MULTI-POINT INSPECTION			
	7074		IMF					(N/C)

****

THANK YOU FOR BEING A FAIRWAY FORD CUSTOMER.
YOU MAY RECEIVE A FACTORY SURVEY REGARDING
YOUR SERVICE VISIT.IF YOUR SERVICE EXPERIENCE
WAS LESS THAN EXCELLENT,PLEASE CONTACT
JESSICA ROBINSON @ 864-242-5060 EXT 297.
THANK YOU.

I hereby authorize the repair work hereinafter set forth to be done along with the necessary material and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere, for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car or truck to secure the amount of repairs thereto. Dealership is not responsible for loss of or damage to the above vehicle or articles left therein, in case of fire, theft, or other cause beyond our control. All payments are due upon completion of repairs. Repair work done on this order will be based in part upon a flat rate manual computation. TERMS: STRICTLY CASH

Any dispute, claim, or controversy arising out of any service (labor or material) provided at customer's request shall be decided by binding, bilateral arbitration under the Federal Arbitration Act. To the extent that the South Carolina Court Annexed Alternative Dispute Resolution (ADR) Rules can be applied to binding arbitration, the parties and the arbitration shall be guided by the processes of the ADR rules.

X _____

RETAIN THIS COPY AS YOUR RECEIPT. PLEASE KEEP THIS COPY FOR YOUR WARRANTY COVERAGE.

SERVICE HOURS
MON. - FRI. 7:30 AM TO 6:00 PM
SAT. 8:00 AM TO 2:00 PM

ALL PARTS ARE NEW UNLESS OTHERWISE SPECIFIED BY TERMS AND CONDITIONS OF YOUR WARRANTY

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	12.98
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	12.98
LESS INSURANCE	0.00
SALES TAX	0.78
PLEASE PAY THIS AMOUNT	13.76

CUSTOMER

Exhibit 3a

MOBILE OIL MASTERS

WE COME TO YOU
8595 Pelham Road #314, Greenville SC. 29615
(864) 630-2272

INVOICE #[redacted]

admin@mobileoilmasters.com
www.mobileoilmasters.com

CUSTOMER: [redacted]		YEAR:	2021	SITE	NO DATA/RWD
SPARTANBURG, SC. [redacted]		MAKE/MODEL:	FORD ECONOLINE E-350	LICENSE/STATE:	[redacted]
Cell: [redacted]		VIN:	1FDWE3FN5M[redacted]	MILES IN/MILES	83575/83575
		ENGINE:	7.3LV8 OHV 16V	Fleet Number	[redacted]

In: 3/16/2023 Out: 3/31/2023 DRIVER NAME PHONE NUMBER Tire size preferred tire number Email: ULI@OWHOLDINGS.COM

VEHICLE ISSUE #1: REBUILD ENGINE				
TECH REPORT: ENGINE REBUILD DUE TO CAMSHAFT AND LIFTER FAILURE. THIS IS A COMMON ISSUE WITH THE NEW FORD 7.3 GODZILLA ENGINES.				
PART: LC3Z-6049-SH	CYLINDER HEAD	2 @ $1,098.82	$2,197.64	NEW
PART: LC3Z-6051-B	HEAD GASKET	2 @ $49.14	$98.28	NEW
PART: LC3Z-6250-A	CAM SHAFT	1 @ $349.99	$349.99	NEW
PART: LC3Z-6564-B	ROCKER ARM	16 @ $48.46	$775.36	NEW
PART: LC3Z-6565-C	PUSH RODS	16 @ $10.26	$164.16	NEW
PART: LC3Z-6584-A	VALVE COVER GASKET	2 @ $25.95	$51.90	NEW
PART: LC3Z-6500-C	ENGINE CAMSHAFT FOLLOWER	16 @ $26.24	$419.84	NEW
PART: LC3Z-6268-A	TIMING CHAIN	1 @ $52.40	$52.40	NEW
LABOR: JACOBS,	CAMSHAFT, R&R, E-450 SUPER DUTY		$1,874.85	LABOR
LABOR: JACOBS,	CYLINDER HEAD, R&R, E-450 SUPER DUTY, BOTH SIDES		$1,249.90	LABOR
			Total for "REBUILD ENGINE":	$7,234.32

Recommended Repairs:		
	Labor/Jobs	$3,124.75
	Parts	$4,109.57
	Sublet	$0.00
	Total Fees	$0.00
	Subtotal	$7,234.32
	Tax @ 6%	$246.57
	Total	$7,480.89
	Payments	$0.00
	Balance	$7,480.89

Replaced parts may be requested by customer. I hereby authorize the above repair work to be done along with all necessary materials. You and your employees may operate the above vehicle for the purposes of testing, inspection or delivery at my risk. An express mechanic's lien is acknowledged on the above vehicle to secure the amount of repairs thereto. The shop will not be held responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft, accident or any other cause beyond your control. In the event legal action is necessary to enforce this contract, I understand that I am solely responsible for all costs including attorney's fees and court costs. I have read the above and acknowledge receipt of an estimate.

X_____ Date 5/17/2023

Exhibit 36

MOBILE OIL MASTERS

WE COME TO YOU
8595 Pelham Road #314, Greenville SC. 29615
(864) 630-2272

INVOICE #11821

admin@mobileoilmasters.com
www.mobileoilmasters.com

CUSTOMER: [redacted]		YEAR:	2021	SITE	NO DATA/RWD
SPARTANBURG, SC. [redacted]		MAKE/MODEL:	FORD ECONOLINE E-350	LICENSE/STATE:	[redacted]
Cell: [redacted]		VIN:	1FDWE3FN5MD[redacted]	MILES IN/MILES	83575/83575
		ENGINE:	7.3LV8 OHV 16V	Fleet Number	[redacted]

In: 5/16/2023 Out: 5/16/2023 DRIVER NAME PHONE NUMBER Tire size preferred tire number Ema[redacted]

VEHICLE ISSUE #1: WARRANTY ENGINE SWAP
WARRANTY CLAIM NUMBER [redacted]

TECH REPORT: 03/31/2023- NEW ENGINE FAILED. ENGINE STARTED KNOCKING AND HAD NOISE COMING FROM TOP END.
04/05/2023- FORD WAS NOTIFIED OF THE ENGINE FAILURE.
04/10/2023- FORD ASKED FOR CODES AND FUEL TRIM. CODES WERE P033F AND FUEL TRIM READINGS WERE STFT1-0% STFT2-0% LTFT1-3% LTFT2-5%.
04/13/2023- FORD AGREED TO REPLACE ENGINE UNDER WARRANTY. CASE NUMBER C[redacted]
04/18/2023- NEW ENGINE WAS SUPPLIED BY FAIRWAY FORD
04/28/2023- COOLANT SYSTEM HOSE FAILED HAD TO ORDER A NEW ONE
05/02/2023- COOLANT SYSTEM HOSE WAS DELIVERED AND REST OF TRUCK WAS PUT BACK TOGETHER
05/08/2023- VEHICLE WAS DELIVERED BACK TO[redacted] AT 3:00PM

Total for "WARRANTY ENGINE SWAP
WARRANTY CLAIM NUMBER CAS-42271539-G0F3ZF TODD ALLTON": $0.00

Recommended Repairs:		
	Labor/Jobs	$0.00
	Parts	$0.00
	Sublet	$0.00
	Total Fees	$0.00
	Subtotal	$0.00
	Tax @ 6%	$0.00
	Total	$0.00
	Payments	$0.00
	Balance	$0.00

Replaced parts may be requested by customer. I hereby authorize the above repair work to be done along with all necessary materials. You and your employees may operate the above vehicle for the purposes of testing, inspection or delivery at my risk. An express mechanic's lien is acknowledged on the above vehicle to secure the amount of repairs thereto. The shop will not be held responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft, accident or any other cause beyond your control. In the event legal action is necessary to enforce this contract, I understand that I am solely responsible for all costs including attorney's fees and court costs. I have read the above and acknowledge receipt of an estimate.

X_____ Date 5/18/2023

Exhibit 3C

VIEW INVOICE MAKE PAYMENT APPROVE TOTAL / ESIGNATURE

Mobile Oil Masters

We Come To You
8595 Pelham Road #314, GREENVILLE SC. 29615
admin@mobileoilmasters.com
(864) 630-2272

Created: 05/16/2023
Invoice # [redacted]

[redacted]

2021 FORD ECONOLINE E-350 SUPER DUTY CUTAWAY
Vin: 1FDWE3FN5MD[redacted]
License: [redacted]

Customer Concern: WARRANTY ENGINE SWAP WARRANTY CLAIM NUMBER [redacted].

? PENDING

Technician Notes: 03/31/2023- New engine failed. Engine started knocking and had noise coming from top end. 04/05/2023- Ford was notified of the engine failure. 04/10/2023- Ford asked for codes and fuel trim. Codes were P033F and fuel trim readings were STFT1-0% STFT2-0% LTFT1-3% LTFT2-5%. 04/13/2023- Ford agreed to replace engine under warranty. Case Number [redacted] 04/18/2023- New engine was supplied by Fairway Ford 04/28/2023- Coolant system hose failed had to order a new one 05/02/2023- Coolant system hose was delivered and rest of truck was put back together 05/08/2023- Vehicle was delivered back to [redacted] at 3:00pm

APPROVE / DECLINE REPAIR

Total for this concern: **$0.00**

Exhibit 3d

Fees	$0.00
Subtotal	$0.00
Tax	$0.00
Total	$0.00
Payments Received	$0.00

Remaining Balance	**$0.00**

SIGNATURE DISCLOSURE

REPLACED PARTS MAY BE REQUESTED BY CUSTOMER. I HEREBY AUTHORIZE THE ABOVE REPAIR WORK TO BE DONE ALONG WITH ALL NECESSARY MATERIALS. YOU AND YOUR EMPLOYEES MAY OPERATE THE ABOVE VEHICLE FOR THE PURPOSES OF TESTING, INSPECTION OR DELIVERY AT MY RISK. AN EXPRESS MECHANIC'S LIEN IS ACKNOWLEDGED ON THE ABOVE VEHICLE TO SECURE THE AMOUNT OF REPAIRS THERETO. THE SHOP WILL NOT BE HELD RESPONSIBLE FOR LOSS OR DAMAGE TO VEHICLE OR ARTICLES LEFT IN VEHICLE IN CASE OF FIRE, THEFT, ACCIDENT OR ANY OTHER CAUSE BEYOND YOUR CONTROL. IN THE EVENT LEGAL ACTION IS NECESSARY TO ENFORCE THIS CONTRACT, I UNDERSTAND THAT I AM SOLELY RESPONSIBLE FOR ALL COSTS INCLUDING ATTORNEY'S FEES AND COURT COSTS. I HAVE READ THE ABOVE AND ACKNOWLEDGE RECEIPT OF AN ESTIMATE.

APPROVE TOTAL

Exhibit 4a

CUSTOMER #: [redacted]

[redacted]

[redacted]

THIS TRANSACTION IS SUBJECT TO MANDATORY ARBITRATION UNDER THE FEDERAL ARBITRATION ACT, 9 U.S.C. § 1 ET SEQ.

INVOICE

PAGE 3

VIC BAILEY FORD · LINCOLN

501 E. DANIEL MORGAN AVE. · P.O. BOX 3568
SPARTANBURG, SC 29304
(864) 585-3600
www.vicbaileyauto.com

NOEMAI@GMAIL.COM
HOME:
BUS:
CON[redacted]
CELL: [redacted]

SERVICE ADVISOR: 97431 JONATHAN TYLER HARW

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
	21	FORD F750	1F65F5KN5M0[redacted]		66608/66608	[redacted]

DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN21 PD			17:00 01NOV23		0.00	CASH	27OCT23

R.O. OPENED	READY	OPTIONS
16:53 10OCT23	14:44 27OCT23	

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL

*** THE FOLLOWING WORK NOT DONE-TRANSFERRED TO RO#543003C ***

B Moved to: 543003C Line: A

MOST NEW FORD PARTS PURCHASED ARE WARRANTED FOR 24 MONTHS OR 24,000 MILES, WHICH EVER OCCURS FIRST. AFTERMARKET NON FORD PARTS ARE WARRANTED FOR 6 MONTHS OR 6,000 MILES, WHICH EVER OCCURS FIRST, PARTS ONLY. NO WARRANTY ON ANY USED PARTS. SEE SERVICE ADVISOR FOR DETAILS.

DISCLAIMER OF IMPLIED WARRANTIES: The only warranties on the parts or service provided under this Order are those offered by the manufacturer of the parts. **DEALER DISCLAIMS ALL IMPLIED WARRANTIES, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND GOOD AND WORKMANLIKE PERFORMANCE.** To the extent permitted by law, Dealer disclaims liability for consequential or incidental damages, including loss of profits.

BY SIGNING BELOW, you acknowledge that you were notified of and authorized the Dealership to perform the services/repairs in this invoice and that you received (or had the opportunity to inspect) any replaced parts requested by you. The vehicle is being returned to you in exchange for your payment of the Amount Due.

CUSTOMER SIGNATURE DATE

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

©2014 CDK Global, LLC (DV17) SERVICE INVOICE TYPE 2 - 2SOC "AS-IS", ORIGINAL 9999999

CUSTOMER COPY

Exhibit 45

THIS TRANSACTION IS SUBJECT TO MANDATORY ARBITRATION UNDER THE FEDERAL ARBITRATION ACT, 9 U.S.C. § 1 ET SEQ.

CUSTOMER #: [redacted] [redacted]

INVOICE

VIC BAILEY FORD · LINCOLN

501 E. DANIEL MORGAN AVE. · P.O. BOX 3568
SPARTANBURG, SC 29304
(864) 585-3800
www.vicbaileyauto.com

PAGE 2

[redacted]

NOEMAI@GMAIL.COM
HOME: CONT: [redacted]
BUS: CELL:

SERVICE ADVISOR: 97431 JONATHAN TYLER HARW

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
	21	FORD F750	1F65F5KN5M0[redacted]		66608/66608	[redacted]

DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN21 DI			17:00 01NOV23		0.00	CASH	27OCT23

R.O. OPENED	READY	OPTIONS:
16:53 10OCT23	14:44 27OCT23	

LINE	OPCODE	TECH	TYPE	HOURS		LIST	NET	TOTAL
				4	*W709001*S300 PIN - LOCATING			(N/C)
				2	F2AZ*6397*A SLEEVE - GUIDE			(N/C)
				1	LC3Z*8507*A GASKET - WATER PUMP			(N/C)
				8	SP*589* SPARK PLUG			(N/C)
				2	VC*13*G ANTI-FREEZE			(N/C)
				2	XT*5*QMC FLUID - TRANSMISSION			(N/C)

FC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:
97854

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

verified concern. performed nvh test and attatched modules to the bottom of engine left valve cover and right valve cover. test drove and found that the noise was coming from the valve covers. removed both valve covers and found that the exhaust lifters for 4 and 8 had failed and wiped out the camshaft lobes. drained coolant, oil, power steering and freon. removed bumper, body add on' s that were in the way and removed all wiring that was on the front of vehicle. removed radiator assembly. disconnected accessory's and removed wiring from trans. removed bolts holding engine to trans and frame. removed engine and removed heads. reinstalled heads with new lifters and head gaskets onto new short block. torqued down heads and installed manifolds. installed pushrods and rockers. torqued rockers to spec. installed valve covers with new gaskets. installed new spark plugs. reinstalled water pump with new gasket. reinstalled engine to truck and installed bolts for trans and frame. reinstalled accessory's and installed trans wiring. reinstalled radiator assembly and reinstalled all of the main harness. reinstalled bumper and body builder add-ons. reinstalled all fluids and test drove. verified fixed.

****

B Moved to: 543003C Line: A
MOVED Moved to: 543003C Line: A
9999 ISPO (N/C)

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

DISCLAIMER OF IMPLIED WARRANTIES: The only warranties on the parts or service provided under this Order are those offered by the manufacturer of the parts. DEALER DISCLAIMS ALL IMPLIED WARRANTIES, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND GOOD AND WORKMANLIKE PERFORMANCE. To the extent permitted by law, Dealer disclaims liability for consequential or incidental damages, including loss of profits.

BY SIGNING BELOW, you acknowledge that you were notified of and authorized the Dealership to perform the services/repairs in this invoice and that you received (or had the opportunity to inspect) any replaced parts requested by you. The vehicle is being returned to you in exchange for your payment of the Amount Due.

CUSTOMER SIGNATURE DATE

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

2014 CDK Global, LLC

CUSTOMER COPY

Exhibit 5

CUSTOMER #: [redacted]

551352C

INVOICE

PAGE 1

Ford OF SPARTANBURG
501 E Daniel Morgan Ave.
Spartanburg, SC 29302
Phone: (864)585-3600
www.FordofSpartanburg.com

[redacted]
CHARLOTTE , NC [redacted]
[redacted] CONT: [redacted]
BUS: CELL: [redacted]

SERVICE ADVISOR: 97431 JONATHAN HARWICK

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
	21	FORD E350	1FDWE3FN8M[redacted]		103177/103177	[redacted]

DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN21 DD			17:00 29JAN24			CC	27JAN24

R.O. OPENED	READY	OPTIONS:
16:46 08JAN24	11:33 27JAN24	

LINE	OPCODE	TECH	TYPE	HOURS		LIST	NET	TOTAL
A CUSTOMER STATES THE CHECK ENGINE LIGHT IS ON								
	RPR	RPR						
		97213		C			3716.09	3716.09
1	LC3Z*6006*B				SERVICE ENGINE ASY	5588.00	5588.00	5588.00
2	LC2Z*9448*A				GASKET	14.68	14.68	29.36
4	*W715618*S437				NUT	0.60	0.60	2.40
8	LC3Z*9439*A				GASKET - INTAKE MANIFOLD	3.06	3.06	24.48
1	8C2Z*8A284*A				REINFORCEMENT	107.66	107.66	107.66
8	AL3Z*6379*BA				BOLT - HEX.HEAD	7.06	7.06	56.48
1	9C3Z*8101*B				RS527 CAP - RAD - WITH PRESS RELIEF	10.53	10.53	10.53

PARTS: 5818.91 LABOR: 3716.09 OTHER: 0.00 TOTAL LINE A: 9535.00

Found a misfire and low compression on cylinder 3, ordered engine and replaced the engine with new intake gaskets, exhaust manifold gaskets, torque converter nuts, found the reinforcement cracked and replaced it, installed new coolant, power-steering fluid, and replaced battery due to no crank, cleared codes and found misfire on cylinder 6, replaced coil and wire found no misfire on cylinder 6, test drove vehicle and found blower motor not working and found air bag light staying on due to passenger seat belt buckle. test drove 20 miles and found vehicle operating normally.

****

CUSTOMER PAY SHOP CHARGE FOR REPAIR ORDER 57.68

0 407.32

ARBITRATION REQUIRED BY THIS PROVISION:
The parties agree that instead of litigation in a court, any dispute, controversy, or claim arising out of or relating to the service or repair of the motor vehicle or to this document or to any other document or agreement between the parties relating to the motor vehicle shall be settled by binding arbitration administered by the American Arbitration Association, under its Commercial Arbitration Rules. No claim submitted to arbitration will be heard by a jury and no claim may be brought as a class action or as a private attorney general. You will not have the right to act as a class representative or participate as a member of a class of claimants with respect to any claim covered by this Arbitration provision. Each arbitration shall be conducted in Spartanburg County, South Carolina. Each party will pay its own costs. Any judgment rendered by the arbitrator may be entered in any court having jurisdiction.

DISCLAIMER OF WARRANTY:
The only warranties on the products sold under this Repair Order are those warranties made by the manufacturer of the parts used. The seller, FORD OF SPARTANBURG hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose and FORD OF SPARTANBURG neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of these products. This disclaimer by the Seller, FORD OF SPARTANBURG in no way affects the manufacturer's warranty.

TERMS: STRICTLY CASH UNLESS PRIOR ARRANGEMENTS MADE
I hereby authorize the repair work hereinafter set forth to be done along with the necessary material and agree that you are not responsible for loss or damage to vehicle or articles left in the vehicle in case of fire, theft, or any other cause beyond your control or for any delays caused by unavailability of parts or delays in parts shipments by the supplier or transporter. An express mechanic's lien is hereby acknowledged on vehicle to secure the amount of repairs thereto. A daily storage fee may be charged if the vehicle is not picked up within five (5) days after the work is completed. IN THE EVENT OF MY DEFAULT IN PAYMENT OF MY BILL, I SHALL BE RESPONSIBLE FOR COST OF COLLECTION INCLUDING REASONABLE ATTORNEY'S FEES PLUS INTEREST.
I AGREE TO THE ABOVE TERMS AND CONDITIONS AND STATE THAT ALL MY REPAIR CONCERNS ARE CLEARLY DESCRIBED AS STATED ABOVE.
We charge non-mandatory shop-related fees on this repair. Please see posted disclosures for more specific information regarding these fees.
Our labor charge is estimated by multiplying the determined amount of flat rate hours times our labor rate. THE NUMBER OF FLAT RATE HOURS CHARGED DOES NOT CORRESPOND WITH THE ACTUAL TIME SPENT BY THE TECHNICIAN SERVICING YOUR VEHICLE.

X _____
CUSTOMER'S AUTHORIZATION OF REPAIRS

DESCRIPTION	TOTALS
LABOR AMOUNT	3716.09
PARTS AMOUNT	5818.91
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES *	57.68
TOTAL CHARGES	9592.68
LESS INSURANCE	0.00
SALES TAX	407.32
PLEASE PAY THIS AMOUNT	10000.00

Copyright 2014 CDK Global, LLC SERVICE INVOICE TYPE 2 - SBC - IMAGING

CUSTOMER COPY

Exhibit 4C

CUSTOMER #: [redacted]

[redacted]

[redacted]

THIS TRANSACTION IS SUBJECT TO MANDATORY ARBITRATION UNDER THE FEDERAL ARBITRATION ACT, 9 U.S.C. § 1 ET SEQ.

INVOICE

PAGE 1

VIC BAILEY FORD · LINCOLN

501 E. DANIEL MORGAN AVE. · P.O. BOX 3568
SPARTANBURG, SC 29304
(864) 585-3600
www.vicbaileyauto.com

NOEMAI@GMAIL.COM
HOME:
BUS:
CONT:
CELL: [redacted]

SERVICE ADVISOR: 97431 JONATHAN TYLER HARW

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
	21	FORD F750	1F65F5KN5M[redacted]		66608/66608	[redacted]

DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN21 DD			17:00 01NOV23		0.00	CASH	27OCT23

R.O. OPENED	READY	OPTIONS:
16:53 10OCT23	14:44 27OCT23	

LINE OPCODE TECH TYPE HOURS	LIST	NET	TOTAL

A CUSTOMER STATES THE ENGINE IS MAKING A NOISE WHILE DRIVING AND SITTING AT IDLE

CAUSE: .

RPR RPR

97854 WT (N/C)
15 LC3Z*6500*C TAPPET - VALVE (N/C)
4 *W715618*S437 NUT (N/C)
1 LC3Z*8575*A THERMOSTAT ASY (N/C)
1 LC3Z*6A642*A OIL COOLER ASY (N/C)
1 LC3Z*6564*B ARM ASY - VALVE ROCKER (N/C)
1 LC3Z*6500*C TAPPET - VALVE (N/C)
1 LC3Z*6565*C ROD - VALVE PUSH (N/C)
8 FOPZ*9229*A KIT - "O" RING (N/C)
16 *W714870*S430 NUT (N/C)
2 LC3Z*6584*A GASKET (N/C)
2 LC2Z*9448*A GASKET (N/C)
1 LC3Z*6051*G GASKET - CYLINDER HEAD (N/C)
1 LC3Z*6051*H GASKET - CYLINDER HEAD (N/C)
1 LC3Z*8C387*A GASKET (N/C)
4 *W716090*S437 BOLT (N/C)
6 *W712861*S439 BOLT (N/C)
20 LC3Z*6065*A BOLT - HEX.HEAD (N/C)
1 LC3Z*6A340*A BOLT (N/C)
2 9W7Z*19B596*A KIT (N/C)
2 LC3Z*6020*A GASKET (N/C)
4 *W520514*S440 NUT - HEX. (N/C)
2 *W709771*S440 NUT - ADJUSTING SCREW (N/C)
6 *W711336*S441 NUT (N/C)
1 FL*820*S FILTER ASY - OIL (N/C)
1 *W715106*S439 BOLT (N/C)
8 AL3Z*6379*BA BOLT - HEX.HEAD (N/C)
1 LC3Z*6009*A CYLINDER ASY - SHORT BLOCK (N/C)
CORE CHARGE W (N/C)
16 LC3Z*9K492*A STUD (N/C)

DISCLAIMER OF IMPLIED WARRANTIES: The only warranties on the parts or service provided under this Order are those offered by the manufacturer of the parts. **DEALER DISCLAIMS ALL IMPLIED WARRANTIES, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND GOOD AND WORKMANLIKE PERFORMANCE.** To the extent permitted by law, Dealer disclaims liability for consequential or incidental damages, including loss of profits.

BY SIGNING BELOW, you acknowledge that you were notified of and authorized the Dealership to perform the services/repairs in this invoice and that you received (or had the opportunity to inspect) any replaced parts requested by you. The vehicle is being returned to you in exchange for your payment of the Amount Due.

CUSTOMER SIGNATURE DATE

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

2014 CDK Global, LLC 10h13 SERVICE INVOICE TYPE 1 2012C - "AS-IS" GENERIC V08R10

CUSTOMER COPY

[redacted]
Charlotte, NC [redacted]

NEF

FREEDOM FOREVERUSA FREEDOM FOREVERUSA

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