

[REDACTED]
[REDACTED]
Palm Beach Gardens, FL [REDACTED]
Ph: [REDACTED] *Fax:* [REDACTED]

October 1, 2024

Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

Re: Important Safety Recall

VIN: SADHD2S15K1 [REDACTED]

Safety Recall H484: I-PACE Traction Battery Thermal Overload –
Elevated Risk
Model Year 2019

Administrator:

Per your **IMPORTANT SAFETY RECALL NOTICES**

RECALL JULY 18, 2023,

RECALL April 24, 2024

RECALL June, 26, 2024

Your instructions have been followed “unsuccessfully”.

All Your Safety Recall recommendations have been Exhausted

Contacted Dealer Service Manager, Mr. Brian Myers.

Contacted Manufacturer JLR Headquarters in Mahwah, NJ.

Contacted Florida Lemon Law, Senior Assistant AG Ms. Leslie Marlowe.

Hired - Lemon Law Attorney Mr. Patrick Cousins.

Purchased 12-31-2018 IN JAGUAR SERVICE: **490 days**

Dealership:

Jaguar Palm Beach, 915 South Dixie Highway, West Palm Beach, FL 33401

Sales: Mr. Brian Gutierrez

Intake Coordinator: Emma Gamble

Service Manager: Mr. Brian Myers

I-Pace Experience Summary

To date the I-Pace has been in service with **"LOSS of USE" 490 days.**

Legal Fees: \$29,253.50

Out of Pocket Expenses: \$15,086.97 (receipts available upon request)

The I-Pace started having issues within the first 1200 miles.

The Dealership was contacted and the original Screen messages Tire Pressure, Battery Fault etc. were addressed by Mr. Gutierrez (Sales Specialist). As the problem escalated either I drove the I-Pace in for service or Jaguar up the vehicle.

In the Spring of 2019, the I-Pace was in Jaguars Service Department approximately 14 times. It has been Flat bedded to Jaguar on 4 occasions. Every effort was made to work with the dealership to resolve the issues with this vehicle.

2020 The I-Pace was in the shop a total of 44 days, 36 cumulative days August 10, 2020, to September 9, 2020.

Unable to reach an amicable solution with the dealership.
Two (2) claims were initiated for Repurchase of the vehicle with the Manufacturer, Jaguar Land Rover of North America headquartered In Mahwah, New Jersey.

Claim 1: 3/29/2021 Case No. [REDACTED] which was denied.

A second Repurchase claim was filed

Claim 2: 9/7/2021 Case No. [REDACTED] which, was also denied.

September 8, 2021, Written Notification was sent to the Manufacturer Jaguar Land Rover of North America headquartered In Mahwah, New Jersey which was received September 11, 2021.

Manufacturer was advised the vehicle had been out of service in repair for the required 15 or more cumulative days. The manufacturer received written Repurchase request on September 11, 2021.

Per the Manufacturers request an inspection was done on the vehicle at the authorized Service Jaguar of Palm Beach where the vehicle was purchased on October 19, 2021.

Due to Covid-19 Closures in 2020 the Lemon Law was extended in Florida.

On September 27, 2021, I filed a Request for Arbitration with the Florida New Motor Vehicle Arbitration Board which was approved on December 2, 2021. Several dates were arranged and ultimately cancelled.

Finally, an Arbitration hearing with the Florida New Motor Vehicle Arbitration Board was held Via Zoom Conference on August 19, 2022, which was denied. Denied due to a mathematical calculation that gave the dealership consideration, for the unavailability of parts and or labor due to Covid-19. It should be noted, the Arbitration Board relied upon inaccurate dates and inaccurate mileage on the Service Invoices which, were not always correct. Emails were sent to Jaguar Service to point out the date errors and mileage errors. In addition, numerous phone calls were made requesting new Service invoices with accurate dates and accurate mileage. I was told by my service advisor their system could not go back and generate corrected Service Invoices.

To Appeal the decision of the Florida New Motor Vehicle Arbitration Boards letter of August 30, 2022, it was my understanding that I would have to retain an attorney and file an appeal by October 5, 2022. Lemon Law Attorney, Mr. Patrick Cousins was engaged and filed an appeal on my behalf.

Inspections and Depositions were arranged for May 10, 2024, and Cancelled. Re-Scheduled for Monday May 13, 2024, and Cancelled. Inspection and Deposition of the vehicle was again Scheduled for June 27, 2024. Expert Larry Dragan was flown in, and I flew in for the deposition. Again cancelled 15 minutes before the Inspection. Arrived at the Dealership to discover Mr. William Bromagan JLR Attorney Conducted an inspection 1 hour prior which, my expert and I we were excluded from.

Any overtures by Mr. William Bromagen that the I-Pace has been abandoned are false as I have worked tirelessly for 5 ½ years to resolve this issue.

Mr. Brian Guiterrez has reached out to Jaguar Regional Manager, Mr. David Stein, In an attempt to help resolve this matter.

The I-Pace has had multiple issues from the onset, **Safety being No.1.**

Brakes failed.

Steering failed.

Was locked IN the vehicle.

Was locked OUT of the vehicle

Vehicle lost Range capability.

3 RECALLS

Windshield and Passenger windows leaked creating mold throughout including leather upholstery, carpet and carpet padding.

Jaguar Palm Beach (dealership) has been aware of all the issues. They were immediately notified within the first 1200 miles in early 2019.

According to Florida Statute Section 681.104(2)(a) requires that "if the manufacturer or its authorized service agent, cannot conform the motor vehicle to the warranty by repairing or correcting any nonconformity after a reasonable number of attempts," the manufacturer shall "repurchase the motor vehicle and refund the full purchase price to the consumer, less a reasonable offset for use, or in consideration of its receipt of payment from the consumer of a reasonable offset for use, replace the motor vehicle with a replacement motor vehicle acceptable to the consumer.

We purchased the vehicle December 31, 2018, we notified the dealership immediately about issues with the vehicle, the warranty expired 12-30-2023.

Thanking you in advance for your assistance in resolving this matter.
Respectfully,

[Redacted Signature]

E-Mail: [Redacted]

NJ Office Telephone: [Redacted]

FL Telephone: [Redacted]

CC: Jaguar Land Rover North America, LLC
Customer Relationship Center
100 Jaguar Land Rover Way
Mahwah, NJ 07495

Ms. Leslie Marlowe
Senior Assistant Attorney General
Lemon Law Arbitration
PL-01 The Capitol
Office of the Attorney General
Tallahassee, FL 32399-1050



IMPORTANT SAFETY RECALL

This notice applies to your vehicle, SADHD2S15K1 [REDACTED]

June 26, 2024

SAFETY RECALL H484: I-PACE Traction Battery Thermal Overload – Elevated Risk

Vehicle Affected: Jaguar I-PACE

Model Year: 2019

National Highway Traffic Safety Administration (NHTSA) Recall Number: 24V-183

Dear Jaguar I-PACE Owner:

This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act. Jaguar has decided that a defect which relates to motor vehicle safety exists in certain 2019 model year Jaguar I-Pace vehicles.

Your vehicle is included in this Recall action.

Jaguar previously wrote to you on 24 April 2024, to advise your vehicle is affected by this recall but that parts were not available for repairs. This second letter confirms that the required parts are now available, and a service appointment can be made.

What is the reason for this program?

Battery packs manufactured between March 1, 2018, and May 31, 2018, are at an increased risk of technical issues that have been shown to contribute to an elevated risk of thermal overload. Vehicles already modified through prior safety recalls H441, H459 or H471 will still need to have the new remedy completed.

A high voltage battery that overheats increases the risk of fire, occupant injury and/or injury to persons outside the vehicle, as well as property damage.

What are the warning signs of this condition?

A high voltage battery that is overheating may result in smoke from the vehicle or fire.

Are there any precautions that may be taken to minimize the safety risk until the corrective measures are implemented?

Clients are advised of the following precautions to minimize the risk of thermal overload which can lead to vehicle fire:

- Do not charge your I-PACE above 75% state of charge
- Do not charge your I-PACE indoors
- Park your I-PACE away from buildings after charging

What will Jaguar and your authorized Jaguar Retailer do?

Your authorized Jaguar retailer will replace the High Voltage battery in your vehicle. There will be no charge to the owners for this repair.

What should you do?

Please contact your preferred authorized Jaguar retailer without delay and provide them with your Vehicle Identification Number (VIN) and request a service date to complete the work required under Program Code 'H484'. Prior to this recall remedy being applied to your vehicle please observe all precautions as detailed above.



0000084
0000086

Attention Leasing Agencies: If you are a vehicle lessor, Federal Regulations require you to forward this notice to your lessee within ten (10) days.

How long will it take?

The work will be carried out as quickly and efficiently as possible in order to minimize any inconvenience to customers. The work is expected to take approximately 2 days although your retailer may need your vehicle for a longer time. Your retailer can provide you with a better estimate of the overall time for the service visit.

Moved or no longer own this Jaguar vehicle?

If you are no longer the owner of this vehicle, Jaguar would appreciate the name and address of the new owner (if known); please fill out and return the enclosed return postage-paid card.

What should you do if you have further questions?

If you have any questions or concerns, please contact the Service Manager at your authorized Jaguar retailer for assistance. If you have any queries or concerns that your retailer cannot address, please contact the Jaguar Customer Relationship Center at **1-800-452-4827, Option 9** and one of our representatives will be happy to assist you.

You may also contact us by email using the following address: jagweb1@jaguarlandrover.com. Please include your full name, address, and VIN of your vehicle in your email.

If you have the need to contact Jaguar by mail, please use the following address:

Jaguar Land Rover North America, LLC
ATTN: Customer Relationship Center
100 Jaguar Land Rover Way
Mahwah, NJ 07495

If you believe your dealer fails to or is unable to remedy this defect without charge and within a reasonable amount of time, you may submit a complaint to the:

Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.,
Washington, D.C., 20590

or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

Thank you again for selecting Jaguar, your ownership experience is very important to us. We recognize this service visit may be an inconvenience to you. Jaguar, in cooperation with your authorized Jaguar retailer, will strive to minimize any inconvenience to you caused by this program.

Sincerely,



Thomas Giese
Director, Customer Experience & Commercial Revenue
Technical Engineering Service

Information Change Card

Name or address has changed (print new information below)

LAST NAME															FIRST NAME															INITIAL				
ADDRESS NUMBER										STREET																								
CITY										STATE										ZIP														

☐ My address has changed
print new address above.

I no longer own this automobile.

☐ Print name and address of
new owner above, (if known).

You may also email this information
Including full VIN to:
jagweb1@jaguarlandrover.com

VEHICLE ⇒ 1**1**66*****SINGLE PIECE 48233
IDENTIFICATION SADHD2S15K [REDACTED] H484 [REDACTED]
NUMBER [REDACTED]
PALM BEACH GARDENS, FL [REDACTED]
[REDACTED]

06/24

Jaguar Land Rover North America, LLC
PO Box 71505
Madison Heights, MI 48071

FIRST-CLASS MAIL
PRESORTED
U.S. POSTAGE PAID
DETROIT, MI
PERMIT NO. 2744

Safety Recall Notice

IMPORTANT: SAFETY RECALL INFORMATION



Issued in Accordance
With Federal Law





IMPORTANT SAFETY RECALL

This notice applies to your vehicle, SADHD2S15K1 [REDACTED]

April 24, 2024

SAFETY RECALL H484: I-PACE Traction Battery Thermal Overload – Elevated Risk

Vehicle Affected: Jaguar I-PACE

Model Year: 2019

National Highway Traffic Safety Administration (NHTSA) Recall Number: 24V-183

Dear Jaguar I-PACE Owner:

This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act. Jaguar has decided that a defect which relates to motor vehicle safety exists in certain 2019 model year Jaguar I-Pace vehicles.

Your vehicle is included in this Recall action.

What is the reason for this program?

Battery packs manufactured between March 1, 2018, and May 31, 2018, are at an increased risk of technical issues that have been shown to contribute to an elevated risk of thermal overload. Vehicles already modified through prior safety recalls H441, H459 or H471 will still need to have the new remedy completed.

A high voltage battery that overheats increases the risk of fire, occupant injury and/or injury to persons outside the vehicle, as well as property damage.

What are the warning signs of this condition?

A high voltage battery that is overheating may result in smoke from the vehicle or fire.

Are there any precautions that may be taken to minimize the safety risk until the corrective measures are implemented?

Clients are advised of the following precautions to minimize the risk of thermal overload which can lead to vehicle fire:

- Do not charge your I-PACE above 75% state of charge
- Do not charge your I-PACE indoors
- Park your I-PACE away from buildings after charging

What will Jaguar and your authorized Jaguar Retailer do?

Your Jaguar retailer will replace the High Voltage battery in your vehicle. However, at this time, the required parts are not yet available. The Jaguar Customer Relationship Center will also contact you by Telephone to discuss your vehicle's repair and to answer any questions you may have. Please also use this opportunity to ask about any vehicle mobility support you may need prior to the completion of the recall remedy.

What should you do?

When the required parts are available you will receive a 2nd notification letter advising repairs may now be performed. At that time, please contact your preferred authorized Jaguar retailer without delay and provide them with your Vehicle Identification Number (VIN) and request a service date to complete the work required under Program Code 'H484'. There will be no charge to owners for this repair. Prior to this recall remedy being applied to your vehicle please observe all precautions as detailed above.



If you believe any of the prior safety recalls H441, H459 or H471 remain open on your vehicle, please contact your preferred Jaguar retailer to confirm if your vehicle has any open Safety Recalls and arrange for that work to be completed without delay. You may also check for any open safety recalls by entering your VIN in the Jaguar USA Product Recall Search tool: <https://www.jaguarusa.com/ownership/vin-recall.html> or on the NHTSA www.safercar.gov web page.

Attention Leasing Agencies: If you are a vehicle lessor, Federal Regulations require you to forward this notice to your lessee within ten (10) days.

How long will it take?

The work will be carried out as quickly and efficiently as possible in order to minimize any inconvenience to customers. The work is expected to take approximately 1 day although your retailer may need your vehicle for a longer time. Your retailer can provide you with a better estimate of the overall time for the service visit.

Moved or no longer own this Jaguar vehicle?

If you are no longer the owner of this vehicle, Jaguar would appreciate the name and address of the new owner (if known); please fill out and return the enclosed return postage-paid card.

What should you do if you have further questions?

If you have any questions or concerns, please contact the Service Manager at your authorized Jaguar retailer for assistance. If you have any queries or concerns that your retailer cannot address, please contact the Jaguar Customer Relationship Center at 1-800-452-4827, Option 9 and one of our representatives will be happy to assist you.

You may also contact us by email using the following address: jagweb1@jaguarlandrover.com. Please include your full name, address, and VIN of your vehicle in your email.

If you have the need to contact Jaguar by mail, please use the following address:

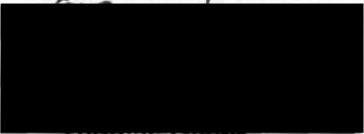
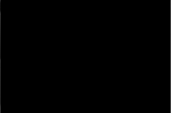
Jaguar Land Rover North America, LLC
ATTN: Customer Relationship Center
100 Jaguar Land Rover Way
Mahwah, NJ 07495

If you believe your dealer fails to or is unable to remedy this defect without charge and within a reasonable amount of time, you may submit a complaint to the:

Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.,
Washington, D.C., 20590

or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

Thank you again for selecting Jaguar, your ownership experience is very important to us. We recognize this service visit may be an inconvenience to you. Jaguar, in cooperation with your authorized Jaguar retailer, will strive to minimize any inconvenience to you caused by this program.


Thomas Giesse
Director, Technical Services - MA-43
Customer Service


84°F



OK to drive with caution
Traction battery fault detected

Press OK to clear

015657 miles



Administrator
National Highway Traffic Safety Adm
1200 New Jersey Ave S.E
Washington DC 20590

FedEx

Express

earth smart

FedEx carbon-neutral
envelope shipping

ORIGIN ID: GMVA

FRANKLIN LAKES, NJ
UNITED STATES US

SHIP DATE: 01OCT24
ACTWGT: 1.00 LB
CAD: 112072166/NET4760

BILL SENDER

TO **ADMINISTRATOR**
NATIONAL HIGHWAY TRAFFIC SAFETY ADM
1200 NEW JERSEY AVE S.E.

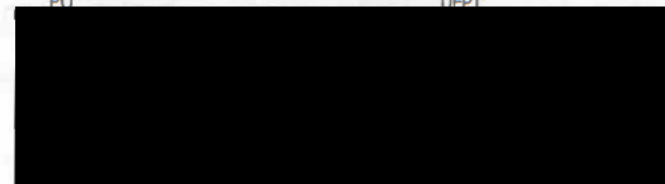
WASHINGTON DC 20590

(888) 327-4236

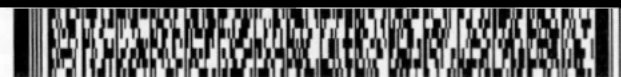
REF:

INV.
PO

DEPT:



FedEx
Express

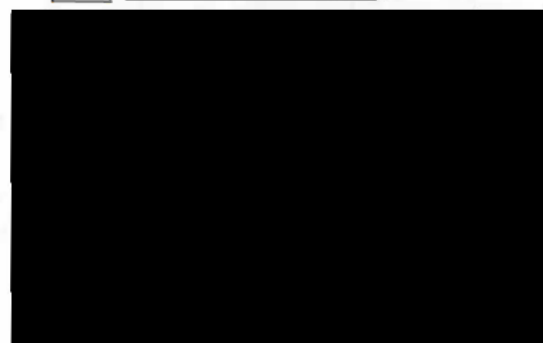


FRI - 04 OCT 5:00P
EXPRESS SAVER

TRK#
0201



20590
DC-US IAD



739

2
17:00

2505
10.03

FZ