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*ALSO ADMITTED IN CALIFORNIA
(inactive)
** ALSO ADMITTED IN FLORIDA

September 22, 2025

First-Class Mail:

Ford Motor Company
PO Box 6251
Dearborn, Michigan 48121-6251

Ford Motor Company
Customer Relationship Center
PO Box 6248
Safety Administration
Dearborn, Michigan 48126

Ford Motor Company
Customer Service Division
PO Box 1904
Dearborn, Michigan 48121

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

**Re: DEMAND FOR PAYMENT - TOWING EXPENSE - SAFETY RECALL
NOTICE 23S64 / NHTSA RECALL 23V905**

To the Legal Department:

This office represents the interests of [REDACTED] (the "Client") is the owner of a 2020 Ford EcoSport (VIN#: [REDACTED]). I am writing to formally demand reimbursement of towing expenses in connection with your defective vehicle and Ford's inadequate dealer support.

The Client's vehicle is subject to Safety Recall Notice 23S64 / NHTSA Recall 23V905, a federally reported safety defect. Ford initially notified the Client of the recall in February 2024 stating that parts were not yet available and that she would be notified when a service appointment could be scheduled for repairs to be completed free of charge with parts anticipated in the second quarter of 2024. The Client received her second recall notice in August 2025 confirming that parts were not available and that repairs could be scheduled promptly.

On [REDACTED] the vehicle broke down after the engine seized en route to Traverse City, Michigan. The Client contacted Feeney Ford in Grayling, Michigan and spoke with Carl Schlegel and was told that the vehicle could not be serviced. The vehicle was then towed the same day to Serra Ford in Kalkaska, Michigan, where Doug Stanula confirmed on August 16, 2025, that it also could not be serviced. The Client further contacted Ford Roadside Assistance and spoke with Jessica on August 16, 2025 and was told no towing would be provided beyond 50 miles. With no support from Ford's dealer network or roadside assistance, the Client had no choice but to arrange

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DEMAND FOR PAYMENT – TOWING EXPENSE – SAFETY RECALL NOTICE 23S64 /

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private towing downstate at a cost of \$625.00.

Per the service center at Suburban Ford of Waterford, Michigan where the car is currently being serviced for the recall, Ford has only offered \$250.00 toward this expense, which is unreasonable and unacceptable. The full towing cost was directly caused by Ford's defective (and unsafe) vehicle, recall delay, and its dealers' refusal to provide timely service and/or loaner vehicles. The Client should not bear the costs arising from Ford's own recall obligations.

Accordingly, demand is hereby made for the full \$625.00 towing invoice. Payment must be received within fourteen (14) days, or by close of business on October 7, 2025. Payment can be remitted to the following address:

[REDACTED]
Waterford, MI [REDACTED]

If Ford fails to comply, the Client will pursue all remedies available under federal and Michigan law, including the Magnuson-Moss Warranty Act, the Michigan Motor Vehicle Service and Repair Act, the Michigan Consumer Protection Act, and the National Traffic and Motor Vehicle Safety Act, and will submit a formal complaint to the Michigan Attorney General's Consumer Protection Division.

This matter needs to be resolved promptly. I can be reached at mroot@iglawfirm.com or (248) 647-8590. Govern yourself accordingly.

Sincerely,

ISHBIA & GAGLEARD, P.C.

[REDACTED]
Michael A. Root
Jeffrey A. Ishbia

MAR/
Enclosure
[REDACTED]

Exclusive Auto Shipping

732 Lewis Blvd S
Tallahassee, FL 32305
Phone: [REDACTED]

ORDER

Customer: [REDACTED]

Order Date: [REDACTED]

Waterford, MI [REDACTED]

Phone: [REDACTED]

PRICE AND PAYMENT

Payment Method: [REDACTED]

Last 4 Numbers On Credit Card: [REDACTED]

Price and Terms:

First Payment: \$625.00

Payment Due: By Credit Card When Placing Order

Total Tariff: \$625.00

SHIPMENT DETAILS

Transport Type: Open

First Available Pickup Date: 8/18/2025

Origin:

Doug Stanula with Serra Ford Kalkaska

231-258-5112

408 W Mile Rd

Serra Ford Kalkaska

Kalkaska, MI 49646

Destination:

Roland Hayes, ext 1514 with Suburban Ford of Waterford

248-674-4781

6975 Highland Rd, Waterford Township, MI 48327

Suburban Ford of Waterford

Waterford, MI 48327

Vehicles:

2020 Ford Ecosport (SUV) (Inoperable: Yes)

Special Terms

DIGITAL SIGNATURE CERTIFICATE

By selecting "I Agree" and entering my full name as a binding electronic signature, I understand that an electronic signature has the same legal effect and can be enforced in the same way as a written signature. Furthermore, I hereby accept terms and conditions of service as described in the "Terms and Conditions" section below.

Electronic Signature: [REDACTED]

Signature IP Address: [REDACTED]

Signed and Accepted On: [REDACTED]



Multi-Factor

Digital Fingerprint Check

Terms And Conditions:

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FIRST-CLASS



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NATIONAL HIGHWAY TRAFFIC

1200 NEW JERSEY AVE SE

WASHINGTON DC 20590

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