

EA02-027

FORD

1/16/04

**FORD LETTER TO ODI
ATTACHMENT C**

BOOK 1 OF 2

PART 4 OF 4

2003

1592511012 CALIFORNIA

ER62-827.1 8713

SIMPLE INTEREST FINANCE CHARGE

Dealer Number _____ Contract Number _____ R.O.S. Number _____ Stock Number **11A37**

| | |
|--|---|
| Buyer and Co-Buyer Name and Address (including County and Zip Code) HOLLYWOOD CA | Creditor - Seller (Name and Address) MIDWAY FORD SALES 288 N VERMONT AVE LOS ANGELES CA 90004 |
|--|---|

You, the Buyer (and Co-Buyer, if any), may buy the vehicle below for cash or on credit. By signing this contract, you choose to buy the vehicle on credit under the agreements on the front and back of this contract. You agree to pay the Creditor - Seller (hereinafter "we" or "us" in this contract) the Amount Financed and Finance Charge according to the payment schedule below. We will figure your finance charge on a daily basis. The Truth-in-Lending Disclosures below are part of this contract.

| Year | Make and Model | Odometer | Vehicle Identification Number | Primary Use For Which Purchased |
|----------|-------------------|----------|-------------------------------|---|
| NEW 2001 | FORD TRUCK ESCAPE | 14 | 1FMYU82181KC23168 | <input checked="" type="checkbox"/> personal, family or household <input type="checkbox"/> business <input type="checkbox"/> agricultural |

FEDERAL TRUTH-IN-LENDING DISCLOSURES

| ANNUAL PERCENTAGE RATE | FINANCE CHARGE | Amount Financed | Total of Payments | Total Sale Price |
|---|--|---|--|---|
| The cost of your credit as a yearly rate. | The dollar amount this credit will cost you. | The amount of credit provided to you or on your behalf. | The amount you will have paid after you have made all payments as scheduled. | The total cost of your purchase on credit, including your down payment of |
| <u>7.99 %</u> | <u>\$ 1972.48 (a)</u> | <u>\$ 25733.72</u> | <u>\$ 27706.20 (a)</u> | <u>\$ 23888.00 (a)</u> |

(a) means an estimate

YOUR PAYMENT SCHEDULE WILL BE

| Number of Payments | Amount of Payments | When Payments Are Due |
|--------------------|--------------------|-------------------------------------|
| One Payment of | N/A | |
| One Payment of | N/A | |
| <u>39</u> Payments | <u>461.77</u> | Monthly, Beginning <u>1/05/2001</u> |
| First Payment | <u>461.77</u> | <u>10/05/2000</u> |

If a payment is not received in full within 10 days after it is due, you will pay a late charge of 5% of the amount of the payment that is late.

Prepayment. If you pay off all your debt early, you may be charged a minimum finance charge, security interest. You are giving a security interest in the vehicle being purchased.

Additional Information: See this contract for more information including information about nonpayment, default, any required repayment in full before the scheduled date, minimum finance charges, and security interest.

STATEMENT OF INSURANCE

NOTICE: No person is regarded as a condition of financing the purchase of a motor vehicle to purchase or negotiate any insurance through a particular insurance company, agent or broker.

Vehicle Insurance

| Territory | Premium |
|--|-------------------|
| \$ <u>N/A</u> Road Comp., Fire & Theft | Mo. \$ <u>N/A</u> |
| \$ <u>N/A</u> Road Collision | Mo. \$ <u>N/A</u> |
| Bodily Injury \$ <u>N/A</u> Limits | Mo. \$ <u>N/A</u> |
| Property Damage \$ <u>N/A</u> Limits | Mo. \$ <u>N/A</u> |
| Medical | Mo. \$ <u>N/A</u> |
| | Mo. \$ <u>N/A</u> |

Total Vehicle Insurance Premiums \$ N/A

UNLESS A CHARGE IS INCLUDED IN THE AGREEMENT FOR PUBLIC LIABILITY OR PROPERTY DAMAGE INSURANCE, PAYMENT FOR SUCH COVERAGE IS NOT PROVIDED BY THIS AGREEMENT.

You may buy the physical damage insurance this contract requires (see back) from anyone you choose with it acceptable to us. You are not required to buy any other insurance to obtain credit.

Buyer [Signature]
Co-Buyer _____
Seller _____

EXPLANATION OF THE AMOUNT FINANCED

1. Total Cash Price

| | |
|--|-------------------------------|
| A. Cash Price of Motor Vehicle and Accessories | <u>\$ 24313.87 (A)</u> |
| 1. Cash Price Vehicle | <u>\$ 23563.87</u> |
| 2. Cash Price Accessories | <u>\$ 750.00</u> |
| F. Document Preparation Fee (not a governmental fee) | <u>\$ 45.00 (B)</u> |
| G. Smog Fee Paid to Seller | <u>\$ N/A (C)</u> |
| H. Sales Tax (on A + B + G) | <u>\$ 1998.65 (D)</u> |
| I. Luxury Tax | <u>\$ N/A (E)</u> |
| J. Service Contract (optional)* | <u>\$ 1455.00 (F)</u> |
| K. Prior Credit or Lease Balance paid by Seller to | <u>\$ N/A (G)</u> |
| the downpayment and trade-in (calculator) | |
| L. Other (to whom paid)* | <u>\$ N/A (H)</u> |
| for _____ | |
| Total Cash Price (A through K) | <u>\$ 27881.77 (1)</u> |

2. Amounts Paid to Public Officials

| | |
|--|-----------------------------|
| M. License Fee | <u>\$ 227.00 (A)</u> |
| N. Registration/Transfer/Tax Fees | <u>\$ N/A (B)</u> |
| O. Smog Impact Fee | <u>\$ N/A (C)</u> |
| P. CALIFORNIA TIRE FEE | <u>\$ 5.00 (D)</u> |
| Q. Other | <u>\$ N/A (E)</u> |
| Total Official Fees (A through E) | <u>\$ 232.00 (2)</u> |

3. Amount Paid to Insurance Companies

| | |
|---|------------------------|
| R. Total premiums from Statement of Insurance column a + b) | <u>\$ N/A (3)</u> |
| S. Smog Certification Fee Paid to State | <u>\$ N/A (4)</u> |
| T. Subtotal (1 through 4) | <u>\$ 28833.77 (5)</u> |

4. Total Downpayment

| | |
|------------------------|-------------------|
| A. Gross Downpayment | <u>\$ N/A (A)</u> |
| Model _____ Make _____ | |
| Model _____ Odom _____ | |

If any insurance is required, please photocopy this form and submit to the insurance company. All details are subject to the policy.

Application for Optional Credit Insurance

Credit Life Buyer Co-Buyer Both

Credit Disability (9-Mo. Only)

| Term | Exp. | Premium |
|-------------------|----------------|--------------|
| Credit Life | N/A, Mo. _____ | \$ _____ N/A |
| Credit Disability | N/A, Mo. _____ | \$ _____ N/A |

Total Credit Insurance Premiums \$ _____ N/A

Insurance Company Name _____

Home Office Address _____

Credit life insurance and credit disability insurance are not required to obtain credit. They will not be provided unless you sign and agree to pay the extra cost. Credit life insurance is based on your original payment schedule. This insurance may not pay all you owe on this contract if you make late payments. Credit disability insurance does not cover any increase in your payment or in the number of payments. Coverage for credit life insurance and credit disability insurance ends on the original due date for the last payment unless a different term for the insurance is shown above.

You are applying for the credit insurance marked above. Your signature below means that you agree that: (1) You are not eligible for insurance if you have reached your 55th birthday. (2) You are eligible for disability insurance only if you are working for wages or profit 30 hours a week or more on the Effective Date. (3) Only the Primary Buyer is eligible for disability insurance. **DISABILITY INSURANCE MAY NOT COVER CONDITIONS FOR WHICH YOU HAVE BEEN A DOCTOR OR CHIROPRACTOR IN THE LAST 6 MONTHS (Refer to "Total Disabilities Not Covered" in your policy for details).**

Claimant Report

1x = repair (Dealer A)
 2x = ordered part (Dealer B)
 3x = repair (Dealer B)
 4x = cost to bring back (Dealer B)
 5x = ordered part (Dealer C)

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 27-JAN-2003
 Note: All Costs are in US Dollars

| VIN | AWS VL | WERS VL | MKT DER | BODY CAB | VER SERIES | DRIVE TYPE | PLANT CD | TRANS CD | ENG COD | PROD DATE | WARR DATE | SELLING DEALER | SELL CNT | TIS QTY | WCC | PRF | BASE | SUFF | VRT | VFG | CCC | CD | |
|-------------------|--------|--|-------------------------|----------|------------|------------|-------------|------------|---------|-----------|-------------|----------------|----------|----------------|------------|--------|-------------|--------|--------|-----|-----|-----|----|
| 1FMYU03181KC23108 | MI | TMI | T/F | T/W | T/E | T/A | AJ | T/D | T/LD | 12-06-01 | 21-09-01 | 171011 | USA | 7 | * | 2E03 | YLBZ | 9E036 | EA | S11 | V43 | D21 | 42 |
| AWS Claim Key: | | 7929422 | Dec #: | 342742D | Trx Code: | | S07 | Labor Hrs: | | 1.8 | Labor Cost: | | 109.08 | Material Cost: | | 87.47 | Total Cost: | | 196.55 | | | | |
| Dir Ctl-Sub Ctl: | | 04790* | Name: GARY YEOMANS FORD | | Ph: | | 386-2536771 | St: FL | | City Ctl: | USA | Reg Ctl: | | NA | Repr Date: | | 09-10-2000 | DST | | | | | |
| Cust Comments: | | A 99 CUSTOMER STATES THAT THE VEHICLE STALLS WHILE DRIVING INTO REVERSE | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | RAN EEC DIAG PASS WDS POWER UP WDS FUEL PRESSURE WDS DATALOGGER ROAD TEST CALLED HOTLINE FOR ASSISTANCE. ORDERED PARTS FOR TESTING. ROAD TEST PID MONITOR RETEST | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03181KC23108 | MI | TMI | T/F | T/W | T/E | T/A | AJ | T/D | T/LD | 12-06-01 | 21-09-01 | 171011 | USA | 14 | * | 1F06 | 2L8Z | BC607 | GA | S09 | V83 | G29 | 42 |
| AWS Claim Key: | | 11287413 | Dec #: | 08705401 | Trx Code: | | S07 | Labor Hrs: | | 1.3 | Labor Cost: | | 97.59 | Material Cost: | | 211.84 | Total Cost: | | 441.43 | | | | |
| Dir Ctl-Sub Ctl: | | 05488* | Name: MIDWAY FORD SALES | | Ph: | | 213-3851411 | St: CA | | City Ctl: | USA | Reg Ctl: | | NA | Repr Date: | | 16-OCT-2002 | DST | | | | | |
| Cust Comments: | | CK BATTERY LIGHT COMES ON | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | REPLACED 2 FANS TO 220 AMP PER TSB 01 20 2 | | | | | | | | | | | | | | | | | | | | | |
| | | <i>Also stalls. ordered part</i> | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03181KC23108 | MI | TMI | T/F | T/W | T/E | T/A | AJ | T/D | T/LD | 12-06-01 | 21-09-01 | 171011 | USA | 14 | * | 2G01 | 1U7Z | 12A650 | AXA | S11 | V41 | D36 | 42 |
| AWS Claim Key: | | 11732511 | Dec #: | 08853601 | Trx Code: | | S07 | Labor Hrs: | | 2.1 | Labor Cost: | | 157.64 | Material Cost: | | 291.43 | Total Cost: | | 561.07 | | | | |
| Dir Ctl-Sub Ctl: | | 05488* | Name: MIDWAY FORD SALES | | Ph: | | 213-3851411 | St: CA | | City Ctl: | USA | Reg Ctl: | | NA | Repr Date: | | 08-09-2002 | DST | | | | | |
| Cust Comments: | | CK BATTERY LIGHT COMES ON AFTER ON ACHIEVE TECH#25 S.O.P. | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | PERFORM OBD II TEST KOER PASS KOER PASS KOER PASS PIN POINT TEST BATTERY FUEL GAUGE NOISE FROM UNDER BODYPAN ROAD TEST 468 FMS SEMILOCK WITH IN | | | | | | | | | | | | | | | | | | | | | |
| | | <i>Rep.</i> | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03181KC23108 | MI | TMI | T/F | T/W | T/E | T/A | AJ | T/D | T/LD | 12-06-01 | 21-09-01 | 171011 | USA | 14 | * | 7B02 | 1LEZ | 10346 | CHRM | S09 | V83 | G29 | 42 |
| AWS Claim Key: | | 11732510 | Dec #: | 08853602 | Trx Code: | | E83 | Labor Hrs: | | 2.3 | Labor Cost: | | 172.66 | Material Cost: | | 182.52 | Total Cost: | | 355.18 | | | | |
| Dir Ctl-Sub Ctl: | | 05488* | Name: MIDWAY FORD SALES | | Ph: | | 213-3851411 | St: CA | | City Ctl: | USA | Reg Ctl: | | NA | Repr Date: | | 11-NOV-2002 | DST | | | | | |
| Cust Comments: | | RECHECK BATTERY LIGHT COMES ON TECH#25 | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | CK CHARGING SYSTEM REPLACED ALTERNATOR REMOVED EXHAUST TO HAVE ACCESS TO REMOVE ALTERNATOR RETEST ALL OK | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03181KC23108 | MI | TMI | T/F | T/W | T/E | T/A | AJ | T/D | T/LD | 12-06-01 | 21-09-01 | 171011 | USA | 16 | * | 1F06 | 1L8Z | 8A080 | BB | S09 | V83 | G29 | 42 |
| AWS Claim Key: | | 12330252 | Dec #: | 6777763 | Trx Code: | | E84 | Labor Hrs: | | 1 | Labor Cost: | | 78.1 | Material Cost: | | 51.55 | Total Cost: | | 129.65 | | | | |
| Dir Ctl-Sub Ctl: | | 05536* | Name: GALPIN FORD | | Ph: | | 818-7873400 | St: CA | | City Ctl: | USA | Reg Ctl: | | NA | Repr Date: | | 08-09-2002 | DST | | | | | |
| Cust Comments: | | CUT STATRES COLLANT LIGHT IS ON | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | CC487 REPLACED COLLANT RESERVOIR | | | | | | | | | | | | | | | | | | | | | |
| | | <i>(5x)</i> | | | | | | | | | | | | | | | | | | | | | |

ENR02-027.1 8718

DEALER 71C 011 1FMYU03181KC23108

| | EXPOSED RETAIL PRICE | AMOUNT |
|-------------------------------------|----------------------|----------|
| U030 ESCAPE XLT 4X2 | 19735.00 | 18469.00 |
| 2001 MODEL YEAR | | |
| PX DARK HIGHLAND GREEN CC MNT | | |
| 1K W PARCH PRISM CLT SFT BUCKET | | |
| 991 3.0L DURATEC V6 ENGINE | 1480.00 | 2332.00 |
| 444 4-SPEED AUTOMATIC O/D TRANS | MC | MC |
| 783 P225/70R16 OWL ALL-SEASON | MC | MC |
| 153 FRONT LICENSE PLATE BRACKET | MC | MC |
| 422 CALIFORNIA EMISSIONS SYSTEM | MC | MC |
| 58K MACH AM/PM/CASS/SINGLE CD/CLK | 508.00 | 454.00 |
| 648 WHEEL, 16 IN. 5-SPOKE CAST ALUM | 175.00 | 187.00 |
| MACH AUDIO SYSTEM | | |
| 824 PRIVACY GLASS | 275.00 | 248.00 |
| TOTAL VEHICLE & OPTIONS | 22170.00 | 20660.00 |
| DESTINATION & DELIVERY | 540.00 | 540.00 |
| SCHEDULE A (DEMO) | .00 | |
| TOTAL FOR VEHICLE | 22710.00 | |

10 U.S. GAL GAS FACTORY 18.00
 CA NEW MTR VEHICLE BOARD FEES 1.00
 PRICED DORA
 BATCH-ID 1F04202525 W EB 2K
 PRICE LEVEL 14530003 VIN: 1FMYU03181KC23108
 SHIPPING WEIGHT 3228 LBS.

THIS INVOICE MAY NOT REFLECT THE FINAL COST OF THE VEHICLE IN VIEW OF THE POSSIBILITY OF FUTURE REBATES, ALLOWANCES, DISCOUNTS AND INCENTIVE AWARDS FROM FORD MOTOR COMPANY TO THE DEALER.

| FDAP/LMDA ASSESSMENT | INVOICE TOTAL | LESS: DISCOUNTS FOR DEALER | LESS: DISCOUNTS FOR CREDIT ACCOUNT | LESS: INVOICE LESS DELIVERY & TAX COST | A PLAN |
|----------------------|---------------|----------------------------|------------------------------------|--|----------|
| 53.00 | 21274.00 | 664.00 | | 20610.00 | 20278.00 |

664.00 72.00 2191.00 1.00 592.00 18169.00

SOLD TO
 Midway Ford Sales 71C011
 200 W Vermont Ave
 Los Angeles CA 90004

| | | |
|------------------|-------------|------------|
| TO | IN STATE | |
| 2 | 6 CA | CK27 |
| DATE BY PREPARED | ITEM NUMBER | TRM TRAMIT |
| 06/04/01 | 71-7075 | 1R 08 |

BHP THROUGH

INVOICE & UNIT IDENTIFICATION NO. (FINAL ASSEMBLY POINT) (FINAL COMPANY AND/OR BANK)
 1FMYU03181KC23108 KANSAS CITY Ford Motor Credit 000001
 1KC23108 1F U03 20010604 010604 1F042 W 145 71C011 2 2274.00 KUI
 THIS INVOICE TO BE USED FOR THE BILLING OF VEHICLE ONLY. DEALER'S COPY

DMC-827.1 8717

CASE:
157-511012
Region: 71
Eileen

Feb 03
Cull
1/21 (2003 was holiday)

The Law Offices of
William R. McGee

Bernardo Executive Center
16855 West Bernardo Drive, Su. 380, San Diego, CA 92127
(858)485-9332, Fax: (858)485-9763
E-mail: Experts4u@aol.com

January 13, 2003

Ford Motor Company
Consumer Affairs – Litigation Prevention Department
PO Box 8248, MD 3NE-B
Dearborn, MI 48126-4207

3 JAN 17 AM 142
CONSUMER AFFAIRS
SECTION

Re: [REDACTED]
2001 Ford Escape
VIN: 1FMYU03181KC23108

Dear Gentlemen:

Please be advised that this law firm has been retained by [REDACTED] to enforce her legal rights regarding the purchase of the above identified vehicle. The purpose of this letter is to set forth the facts of this case, cite the applicable law and attempt to resolve this matter as quickly and efficiently as possible.

[REDACTED] purchased her 2001 Ford Escape on or about September 21, 2001. (A copy of the purchase contract is enclosed for your reference.) [REDACTED] was understandably excited and proud about her 2001 Ford Escape, feeling that she had made a quality choice for her driving needs and enjoyment. [REDACTED] anticipation and excitement, however, have turned to disappointment and frustration due to numerous unsuccessful repair attempts which have substantially impaired the vehicle to her. This is not what [REDACTED] was promised nor bargained-for when she purchased her 2001 Ford Escape.

The subject vehicle has suffered from a serious defects and nonconformities to warranty, the most serious and persistent being that the engine will stall and die. Ms. Paul has presented the subject vehicle to an authorized Ford dealer on five (5) separate occasions for these stalling complaints, and now the dealer has ordered parts and wants her to bring it back in again! Copies of the warranty repair documentation is enclosed for your review.

[REDACTED] is not required to live with this problematic and obviously unsafe vehicle as it does not provide the peace of mind nor reliability which she requires and deserves. Accordingly, [REDACTED] is herein demanding her entitlement under the Song-

Beverly Consumer Warranty Act (the "Lemon Law"), California Civil Code sections 1790 et seq., which provides:

If the manufacturer or its representative in this state is unable to service or repair a new motor vehicle . . . to conform to the applicable express warranties after a reasonable number of attempts, the manufacturer shall either promptly replace the new motor vehicle . . . or promptly make restitution to the buyer . . . However, the buyer shall be free to elect restitution in lieu of replacement.

(B) In the case of restitution, the manufacturer shall make restitution in the amount equal to the actual price paid or payable by the buyer, including any charges for transportation and manufacturer installed options . . . and including any collateral charges such as sales tax, license fees, registration fees and other official fees, plus any incidental damages . . . including but not limited to reasonable repairs, towing and rental car costs actually incurred by the buyer.

Civ. Code § 1793.2(d)(2) (emphasis added).

The Lemon Law goes on to state:

(a) Any buyer of consumer goods who is damaged by a failure to comply with any obligation under this chapter or under an implied or express warranty or service contract, may bring an action for recovery of damages and other legal and equitable relief. . . .

(c) If the buyer establishes that the failure to comply was willful, the judgment may include, in addition to the amounts recovered, a civil penalty which shall not exceed two times the amount of actual damages. . . .

(d) If the buyer prevails in an action under this section, the buyer shall be allowed by the court to recover as part of the judgment a sum equal to the aggregate amount of costs and expenses, including attorneys' fees, determined by the court to have been reasonably incurred by the buyer in connection with the commencement and prosecution of such action.

Civ. Code §1794 (emphasis added).

In light of the facts of this case as applied to the Lemon Law, there is no doubt that Ford Motor Company is obligated to make restitution to [REDACTED] for the "lemon" which was sold to her. In light of the facts of this case where liability is clear, further denial of your obligations under the Lemon Law can only be described as "wilful," triggering the civil penalty provision quoted above.

[REDACTED] is willing to litigate this matter, however, she would prefer to resolve it short of filing a lawsuit. Furthermore, I believe it is also in Ford Motor Company's best interests to settle this dispute rather than defending a lawsuit which it will ultimately lose and face the concomitant penalties and expenses which that defense will necessarily entail, including interest and legal fees.

At this time, [REDACTED] is willing to return the subject vehicle to Ford Motor Company and settle this matter for a repurchase of the vehicle, including restitution in the following amount:

| | |
|--|------------|
| Down payment | \$2,300.00 |
| Monthly payments (16 @ \$461.77) | 7,388.32 |
| 2002/2003 license fee (prorated) | (TBD) |
| Less use of 17,436 miles | (3,532.68) |
| Attorney's fees | 2,500.00 |
| SUBTOTAL: \$8,655.64 | |

In addition, it will be required that Ford Motor Company satisfy the outstanding balance owing to the lien holder of the subject vehicle, Ford Motor Credit (An Authorization for the release of this information is enclosed for your use.) Please give this demand the serious consideration it deserves. If I do not hear from you by February 13, 2003, I shall assume that Ford Motor Company is denying its obligations under the law and is leaving [REDACTED] with no choice but to initiate formal legal proceedings.

January 13, 2003
Page 4

Thank you for your prompt attention to this matter.

Very truly yours,


WILLIAM R. MCGEE

Enclosures

cc: 

Any comments? You can contact



webmaster

ENR2-027.1 0722

Vehicle Information Report

GENERAL VEHICLE INFORMATION:

(Related Claims)

VIN: 1FMYU03181KC23108 Veh Line: T/M1 - ESCAPE (U204) [2001] Body Shell: *

Model Year: 2001 Market Deriv: T/F - FORD DIVISION DERIVATIVE Motor Eng Serial No: 943623086

Veh Type: T Drive Code: T/A - 2 WHL L/H FRONT DRIVE Engine: T/LD - MOD 3.0L DOHC EFI NA V6 G7NA40

Inv. Dealer: 05488 Body Csb Style: - 5 DOOR LIGHT TRUCK Transmission: T/DJ - 4 SPD AUTO TRANS NA40 CD4E

Vehicle Status Code: 800 Version/Series: T/EP - FORD SERIES

Trace Eng Serial No:

-----1-----2-----3-----4-----5-----6-----7-----8

NA

Trace Trans Serial No:

NA

BUILD INFORMATION:

Region: NA - ##### Plant: AJ - KANSAS CITY PLANT BUILD

Country: USA - ##### Prod Date: 12-JUN-2001

SALE INFORMATION:

Region: NA - ##### Selling Dealer: 171011 - *

Country: USA - ##### Selling Dir Sp/Prov: CA

Buyer St/Prov: CA

Arrival Date: 21-JUN-2001 Red Carpet Lane: *

Sale Date: 21-SEP-2001 Fleet/Retail/Ca. Lease: R

Warranty Start Date: 21-SEP-2001 Modified Vehicle: * Vehicle Count Flag:

Orig Warranty Date: 21-SEP-2001 Reacquired Vehicle: * Vehicle Export Flag: N

EQ02-027.1 0723

VOC/EOC:

-----1-----2-----3-----4-----5-----6-----7-----8-----9-----0-----

U031M;23188103378 N 2 18E7075 GE 2 2 496 53 5 3 2K5 5 #S3A8N 71C011 2V PK A 18A64 3 2 11

PW9 0 914CA E

INSTALLED OPTION INFORMATION:

| | | | |
|------------------------|--------------------------------|----------------------|-----------------------------------|
| Air Conditioning: | T/B - MANUAL AIR CONDITIONER | GVW Code: | |
| Alternator Amp Rating: | C | GVW Class Code: | Y |
| Audio Disk: | * - [N/A] | Instruments: | * - [N/A] |
| Axis Ratio: | * - [N/A] | Mirror(Driver Side): | AD - DRIVER POWER MIRROR |
| Axis Type: | * - [N/A] | Mirror(Passr Side): | AD - PASS POWER CONVEX MIRROR |
| Battery Amp Rating: | A | Paint: | PNPDW - DARK HIGHLAND GREEN C/C |
| Brake Code: | FEAAB - 4 WEL ANTI-LOCK BRAKES | Power Antennae: | * - [N/A] |
| Brake Code(Service): | * - [N/A] | Radio: | BE - ELETR PREM STRO/STE/DISC/CLK |
| Calibration Code: | DM11A30A | Sound System: | AE - AURDOPHILB SOUND SYSTEM |
| Color(Accent): | * - [N/A] | Susp Trimmed Axle: | |
| Color(Trim): | 000HF - | Tire Manufacturer: | AP - |
| Delivery Type: | D | Tire Brand: | A308453 - |
| Driveshaft Code: | D | Tire Size: | D3J11 - P235/70R-16 OWL A-S |
| Front Seat: | * - [N/A] | Traction Control: | * - [N/A] |
| Fuel Type: | * - [N/A] | Wheel Base: | |

TIRE DOT INFORMATION:

LF: A3084531701 RP: A3084531701
 LR: A3084531701 RR: A3084531701
 LI: * RI: *

SPARE: HYA1R82001 DOT Plant Manufacturer: A3 - GENERAL TIRE & RUBBER CO; MOUNT VERNON; ILLINOIS; UNITED STATES

ESP INFORMATION: EMISSIONS INFORMATION:

| | | | |
|----------------------|-------------|------------------------|-------------|
| ESP Code: | K | Emission Code: | T/C - T/C |
| ESP Coverage(Miles): | 100 | Emission Cert Type: | 5 |
| ESP Coverage(Time): | 060 | Emission Decal Suffix: | HMA |
| ESP Plan Year: | 2001 | Engine Family: | 1FMX70301F6 |
| ESP Signature Date: | 21-SEP-2001 | | |

Any comments? You can contact

EMR-027.1 8724

webmaster

EN92-027.1 0725

| | | | | |
|--------------------------------|-------------|------------|------------|-------------|
| Account Number NC A388 KPC8 | 2001 ESCAPE | 12/16/2002 | 01/06/2003 | \$21,074.86 |
|--------------------------------|-------------|------------|------------|-------------|



For address changes or other communication, feel free to contact us.



CUSTOMER SERVICE CENTER 1-800-727-7000 Mon - Sat 7 am - 5 pm CST

WEBSITE ADDRESS www.fordcredit.com

If you disagree with your current charges or transactions since last statement, please send all correspondence to:

Ford Credit
c/o Correspondence
P.O. Box 543288
Omaha, NE 68154

For payment remit to:

FORD CREDIT
PO BOX 7288 NC
FASADENA CA 91109-7388

TRANSACTIONS SINCE LAST STATEMENT

| Transaction Date | Description | Amount |
|------------------|------------------|----------|
| 12/12/2002 | Payment received | \$461.77 |

Payments received after statement date are not reflected.

PAYMENT(S) DUE

| Due Date | Description | Amount |
|------------|-------------|----------|
| 01/06/2003 | Payment due | \$461.77 |

Payments received at a location other than the residence address shown below may delay crediting your account unless otherwise provided by law.

At the end of December, we will be upgrading our computer systems to serve you better. As a result, we will be unavailable on-line for Account Access, E-Bill, and On-line Financing or by telephone from 2:00 pm (EST) on 12/31/02 until noon (EST) on 01/02/03. We appreciate your business and apologize for any inconvenience during these systems upgrades.



As required by law, in some cases, you are hereby notified that a negative credit report reflecting your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

DETACH AND RETURN THIS STUB FOR EACH ACCOUNT PAID.



Ford Credit
P.O. BOX 236801
LAS VEGAS NV 89123-6801

Account Number: NC A388 KPC8
Payment Due Date: 01/06/2003
TOTAL AMOUNT DUE: \$461.77

If Payment Received AFTER
Please Pay: 01/15/2003
\$464.85

\$ [Handwritten amount]

ENTER TOTAL AMOUNT PAID IN THE BOX ABOVE

AT 01 028103 004018106 A**3DGT



WEST HILL CA

REMIT TO:
FORD CREDIT NC A388 KPC8
PO BOX 7288 NC
FASADENA CA 91109-7388



DO NOT WRITE BELOW THIS LINE

8105543417379765257587600046177108



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004
 (213) 385-1411



BAR #AD016796

EPA #CAD981159320

| | | | | |
|-------------------------------|--|-----------------------|---------------------------------|-------------------------------|
| CLERK NO. 18308 | NAME JANE SANCHEZ 315 | PLATE NO. 3272 | RECEIPT DATE 11/28/01 | PHONE NO. EDCS7041 |
| ADDRESS [REDACTED] | LEASER NO. [REDACTED] | MODEL 240E | DEALER MIDWAY FORD | STOCK NO. 11437 |
| WEST HILLS, CA [REDACTED] | TRANSMISSION 42 SPEED TRUCK/ESCARELLY | YEAR 2001 | DELIVERY DATE 08/21/01 | DELIVERY MILE 14 |
| FINANCIAL PHONE [REDACTED] | VEHICLE ID NO. 1EMV03121K C23106 | FIN NO. [REDACTED] | DEALER DEALER NO. [REDACTED] | PRODUCTION DATE [REDACTED] |
| | DEALER | | S.A. DATE 11/28/01 | |

JOB # 1 CHARGES

LABOR
 #1 OILPOZ OIL AND FILTER PER SALES COUPON RECOMMENDED MAINT DONE TECH(S) 311 INTERNAL

| PARTS | QTY | FP | NUMBER | DESCRIPTION | LIST PRICE | UNIT PRICE | INTERNAL |
|---------------|-----|----|---------------|--------------------|------------|------------|---------------|
| | 1 | 5 | PL-100-S 9020 | FILTER AST-OIL OIL | | | INTERNAL 0.00 |
| TOTAL - PARTS | | | | | | | INTERNAL 0.00 |

| MISC | CODE | DESCRIPTION | CONTROL NO. | INTERNAL |
|--------------|-------|-------------------------|-------------|---------------|
| | PS | SALES POLICY ADJUSTMENT | | INTERNAL 0.00 |
| | SALES | SALES POLICY ADJUST | | INTERNAL 0.00 |
| TOTAL - MISC | | | | INTERNAL 0.00 |

JOB # 1 TOTALS
 JOB # 1 JOURNAL PREFIX FDOS JUMP 2 TOTAL 0.00

TOTALS

| | |
|------------------|------|
| TOTAL LABOR | 0.00 |
| TOTAL PARTS | 0.00 |
| TOTAL MISC | 0.00 |
| TOTAL TAX | 0.00 |
| TOTAL INVOICE \$ | 0.00 |

THANK YOU FOR YOUR BUSINESS!!
 SALES DISTRIBUTION CODE 710811

CUSTOMER SIGNATURE
 ***** DUPLICATE INVOICE *****



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004

(213) 385-1411

FLEET "HOT" LINE
 (213) 385-8105



ALTERNATIVE SOURCE AND RECOMMENDED MILES 241 4288

EP02-027.1 0727



1420 Tomoka Farm Road • (386) 253-7081
DAYTONA BEACH, FLORIDA 32124

STATE OF FLORIDA REGISTRATION # MV-06678

| | | | | |
|---|---------------------------|--------------------------|----------------------|------------------------------------|
| CUSTOMER NO. 83014 | NAME MARION SHAFER | PHONE 3710 128961 | DATE 01/27/02 | REGISTRATION NO. 1480884274 |
| ADDRESS MIAMI BEACH, FL | | VEHICLE NO. | MODEL | PROVINCE |
| DESCRIPTION 1997 FORD TRUCK/ESCAPE/4 DOOR UTILITY | | DELIVERY DATE | DELIVERY MILE | |
| VIN 1F1P11P1003181K23108 | | SALES DEALER NO. | PRODUCTION DATE | |
| P.O. NO. | | P.O. NO. | DATE 01/27/02 | |
| COMMENTS | | NO. 17442 | | |

01 1 12702
ALL WORK
A-99 CUSTOMER STATES THAT THE DRIVERS SIDE REAR WINDOW IS
SMASHED OUT
CUSTOMER DECLINED REPAIRS TO VEHICLE

| PARTS | QTY | PP-NUMBER | DESCRIPTION | UNIT PRICE | JOB # | TOTAL PARTS | 0.00 | |
|-------|-----|-----------|-------------|------------|-------|-------------|-----------------------------|------|
| | | | | | | | JOB # 1 TOTAL LABOR & PARTS | 0.00 |

01 2 12702
A-99 CUSTOMER STATES THAT THE VEHICLE WILL NEED PUTTING
INTO REVERSE
NO 17469
CO2E BASIC SERVIS
VAN EEC DIAG PASS HIS POWER UP NOS FUEL PRESSURE NOS OXYGEN
ROAD TEST CALLED NOBLE REPLACES FOM RELAY, REPLACED THROTT
LE BODY UPDATE FOR REPAIRED EEC WIRING ROAD TEST PID MONITOR
RETEST P1008

| PARTS | QTY | PP-NUMBER | DESCRIPTION | UNIT PRICE | JOB # | TOTAL PARTS | 0.00 | |
|-------|-----|---------------|----------------|------------|-------|-------------|-----------------------------|------|
| 1 | 1 | FO42-14000-A | BUKT ASY-RLY N | | 2 | | | |
| 1 | 1 | YLBZ-98203-0A | BOY ASY-AIR IN | | 2 | | | |
| 1 | 1 | YFLZ-98306-AA | BUCKET THROTT | | 2 | | | |
| | | | | | | | JOB # 2 TOTAL LABOR & PARTS | 0.00 |

ESTIMATE
CUSTOMER HERBY ACKNOWLEDGES RECEIVING ORIGINAL ESTIMATE OF \$688.00 (+TAX)
CUSTOMER'S SIGNATURE

(CHECK OFF APPROPRIATE BOX)

SALES REPAIRS TO EXISTING USED

P & A Check (Date)

DATE LABOR TOTAL

SHOP SUPPLIES AND HAZARDOUS WASTE DISPOSAL CHARGES

This charge represents costs and profits to the motor vehicle repair facility for items such as miscellaneous shop supplies and/or waste disposal. (s. 320.004(4))

The State of Florida requires a \$1.00 fee to be collected for each new tire sold in the state (s. 402.718), and a \$1.00 fee to be collected for each new or remanufactured battery sold in the state (s. 402.718).

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CUSTOMER COPY

(CONTINUED ON NEXT PAGE) 11:02:48



1620 Youngs Farm Road • (386) 253-6771
DAYTONA BEACH, FLORIDA 32118

STATE OF FLORIDA REGISTRATION # MV-98878

| | | | | |
|-----------------|----------------------------|-----------------|---------------|-------------------|
| INVOICE # 83014 | MARION SHAFFER | 3710 54-461 | 404-98702 | 404-98702 |
| ADDRESS | CITY | STATE | ZIP | REG. NO. |
| MIAMI BEACH, FL | | FL | 33136 | 17436 |
| VEHICLE MAKE | VEHICLE MODEL | VEHICLE YEAR | VEHICLE COLOR | VEHICLE REG. NO. |
| | TRUCK/SCOPE/4 DOOR UTILITY | | | |
| VEHICLE VIN | VEHICLE REG. NO. | VEHICLE LICENSE | VEHICLE TITLE | VEHICLE REG. DATE |
| | U031WIK23108 | | | |
| DATE | TIME | DATE | TIME | DATE |
| | | | | |
| REMARKS | NO: 17461 | | | |

| | | |
|---|-------------------------|-------------|
| () CASH () CHECK () CHANGE () MAC () MISA () JAN/02 | TOTAL LABOR | 0.00 |
| PAID | TOTAL PAINT | 0.00 |
| | TOTAL TIRE | 0.00 |
| | TOTAL FLUIDS | 0.00 |
| | TOTAL WAX | 0.00 |
| | TOTAL WASH | 0.00 |
| | TOTAL WAX DISC | 0.00 |
| | TOTAL TAX | 0.00 |
| | TOTAL INVOICE \$ | 0.00 |

WE THANK YOU FOR LETTING US SERVE YOU. YOU MAY BE RECEIVING A SURVEY FROM FORD MOTOR CO. IF FOR ANY REASON YOU CANNOT ANSWER ALL THE QUESTIONS "COMPLETELY SATISFIED" PLEASE CALL US. WE WILL DO ALL WE CAN TO MAKE SURE THAT ALL YOUR CONCERNS ARE RESOLVED.

WAX SUPPLIES AND HAZARDOUS WASTE DISPOSAL CHARGES
This charge represents costs and profits to the motor vehicle repair facility for items such as miscellaneous shop supplies and/or waste disposal. (s. 468.304(4))

The State of Florida requires a \$1.00 fee to be collected for each car the sold in the state (s. 468.710), and a \$1.00 fee to be collected for each new or re-manufactured battery sold in the state (s. 468.710).

CUSTOMER SIGNATURE

PAGE 1 OF 2 CUSTOMER COPY (END OF INVOICE | 180648)

Gary Yeomans



Thanks from Marion Shaffer,
your friendly Service Advisor
(386) 253-6771

YOUR NEXT SERVICE IS DUE
20436 MILES
OR
July 31, 2002

Company Name
Gary Yeomans

P.O. Box No.
FOODS/812

Thank you for choosing our
Service department at
Gary Yeomans

If at any time you have questions
regarding the service performed on
your vehicle, don't hesitate to give
us a call.

MARION SHAFFER
Service Technician
(386) 253-6771



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004
 (213) 385-1411



SUZUKI
 OF
 LOS ANGELES

BAR #AD016796

EPA #CAD981159820

| | | | | |
|-----------------------|---|--------------------------------------|-------------------------|---------------------------|
| CUSTOMER NO. 38202 | ADDRESS ALBERT VALENZUELA CASH PAID | TRUCK NO. 8187 | BRIDGE DATE 10/21/02 | WARRANTY NO. FOC887054 |
| | LOCATION WEST HILLS, CA | PLATE NO. | DEALER MIDWAY FORD | STOCK NO. 11437 |
| | VEHICLE MAKE JOURNAL TRUCK REPAIR | VEHICLE MODEL 1EMV10S161K 02 3108 | DEALER DATE 08/21/01 | DEALER MILES 14 |
| | VEHICLE CO. NO. | VEHICLE REG. NO. | VEHICLE REG. DATE | |
| | PLATE NO. | P.A. NO. | REG. DATE 10/18/02 | |

JOB 1 CHARGES

| | | | |
|----------------|--|------------------------------|-------------|
| LABOR | QUICK SERVICE | TERMS: 1215 | WARRANTY |
| JP 1 00F02 | REPLACES 2 FANS TO 220 AMP PER TSB 01-20-2 | | |
| PARTS | QUANTITY | DESCRIPTION | LIST PRICE |
| | 1 | 2L8Z-BC697-BA MOTOR & FAN AS | |
| TOTAL - PARTS | | | 0.00 |
| SUBLET | FOR | DATE | DESCRIPTION |
| | 7720 | 10/21/02 | CAR RENTAL |
| TOTAL - SUBLET | | | 0.00 |

JOB 1 TOTALS
 JOB 1 JOURNAL PREFIX FOC8 JOB 1 TOTAL 0.00

| | | | |
|----------------|------------|------------|----------|
| LABOR | PRIVATEITY | TERMS: 145 | WARRANTY |
| JP 2 10F02 | | | |
| TOTAL - PARTS | | | 0.00 |
| TOTAL - SUBLET | | | 0.00 |

JOB 2 TOTALS
 JOB 2 JOURNAL PREFIX FOC8 JOB 2 TOTAL 0.00

COMMENTS
 DELETED OPERATION(S)
 70F02 SUBLET

Handwritten notes:
 10/21/02
 11/15/02



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004

(213) 385-1411

FLEET "HOT" LINE
 (213) 365-8105



ALTERNATIVE ENERGY RESOURCES INC. 344.888



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004
 (213) 385-1411



SUZUKI
 IN
 LOS ANGELES

BAR #AD018798

EPA #CAD981159320

| | | | | |
|--|--|--|--|--|
| CUSTOMER NO. 38388 [REDACTED] WEST HILLS, CA 91307 | #PAYER ALBERT VALENCIA 501 LAST NAME CUSTOMER NO. 32330 IN FORD TRUCK/ESC/SPORT VIN 1FMYU0211FC23108 | TAG NO. 8167 IN STATE 32330 | PURCHASE DATE 1/02/03 COLOR RED PARCH DELIVERY DATE 01/21/03 BILLING OPTION NO. 10U1807 | INVOICE NO. EDCS87034 STORE NO. 11427 DELIVERY MILES 14 PRODUCTION DATE |
|--|--|--|--|--|

TOTALS

 * [] CASH [] CHECK CK NO. [] *
 * [] VISA [] MASTERCARD [] DISCOVER *
 * [] AMEX EXPRESS [] OTHER [] CHANGE *

| | |
|-------------------------|-------------|
| TOTAL LAKE | 0.00 |
| TOTAL SALES | 0.00 |
| TOTAL D.O.C. | 0.00 |
| TOTAL DISC. COM. | 0.00 |
| TOTAL TAX | 0.00 |
| TOTAL INVOICE \$ | 0.00 |

THANK YOU FOR YOUR BUSINESS!!
 SALES DISTRIBUTION CODE 710013

CUSTOMER SIGNATURE

DUPLICATE INVOICE



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004

(213) 385-1411

FLEET "HOT" LINE
 (213) 365-8105



SUZUKI
 IN
 LOS ANGELES



DAEWOO



17-5372

ALTERNATIVE SOURCE 800-368-6888



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004
 (213) 365-1411



BAR #AD016786

EPA #CAD881159320

| | | | | |
|-----------------------|---|---------------------------|--------------------------|-------------------------|
| Customer No. 30280 | Technician ALBERT VALENCIA 501 | Year 1990 | Invoice Date 11/15/02 | Invoice No. ECC88838 |
| | Job # 33106 | Make/Model SUZUKI | Color MET PLACH | Price No. 11437 |
| | Vehicle Description CUMMINS TRUCK/ENCABENT | Delivery Date 08/21/01 | Days Away 14 | Production Date |
| | Vehicle ID No. 1FMYH03181K C23108 | MSRP/Dealer No. | MSRP/Dealer No. | |
| WEST HILLS, CA | P.T.E. No. | P.T. No. | A.S. Date 11/11/02 | |

JOB# 1 CHARGES

| | | | | |
|---|----------------|----------------|-----------------------|----------|
| LABOR | | | | WARRANTY |
| JOB# 1 | 10PM0Z | DRIVEABILITY | TECH(S): 125 | |
| CK ENSURE PROPERLY ADJUSTED. TESTED. PASS. TEST. PASS. TEST. PASS. PIN-POINT. REPAIR. TEST. TEST. PASS. TEST. PASS. TEST. PASS. TEST. PASS. TEST. PASS. TEST. INSTALL. PART. MAKE. AS. TO. NUMBER. TEST. ALL. PINS. SEEMS. OK. WITH. 7th. SPARK. | | | | |
| PARTS | | | | WARRANTY |
| QTY | FP NUMBER | DESCRIPTION | LIST PRICE-UNIT PRICE | |
| 1 | 1177-12468-AXA | PROCS ASY-ONE | | |
| | 1129 | 2000 FOLDS KEY | | |
| | F212-14526-P | PS ASY-20 AMP | | |
| | | | TOTAL - PARTS | 0.00 |

| | | | | | |
|----------------|-----|-----------|----------|-------------|----------|
| SUBLET | FOC | VENO TIME | INV DATE | DESCRIPTION | WARRANTY |
| 7864 | | | 11/18/02 | CAR RENTAL | 0.00 |
| TOTAL - SUBLET | | | | | 0.00 |

JOB# 1 TOTALS **JOB# 1 JOURNAL PREFIX FOCs** **JOB# 1 TOTAL** 0.00

JOB# 2 CHARGES

| | | | | |
|--|-----------------|---------------|-----------------------|----------|
| LABOR | | | | WARRANTY |
| JOB# 2 | 00PM0Z | QUICK SERVICE | TECH(S): 121 | |
| RECHECK BATTERY LIGHT COMES ON TECHNICIAN OR CHARGING SYSTEM REPLACED ALTERNATOR REMOVED EXHAUST TO HAVE ACCESS TO REMOVE ALTERNATOR RETEST ALL OK | | | | |
| PARTS | | | | WARRANTY |
| QTY | FP NUMBER | DESCRIPTION | LIST PRICE-UNIT PRICE | |
| 1 | 1182-10346-CSRH | ALT ASY 65 | | |
| | | | TOTAL - PARTS | 0.00 |

JOB# 2 TOTALS **JOB# 2 JOURNAL PREFIX FOCs** **JOB# 2 TOTAL** 0.00

COMMENTS
 DELETED OPERATIONS(S)
 70F02 SUBLET

RECOMMENDATIONS
 HELPS FRONT BRAKES METAL TO METAL (UNSAFE)
 CUSTOMER ADVISED DECLINED REPAIRS



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004

(213) 365-1411

FLEET "HOT" LINE
 (213) 365-8106



FORD MOTOR COMPANY, INC. A FORD CREDIT COMPANY



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004
 (213) 385-1411



SUZUKI
 OF
 LOS ANGELES

BAR #AD016796

EPA #CAD981169320

| | | | | |
|-----------------------|---|----------------|----------------------------|--------------------------|
| CUSTOMER NO. 38288 | ADDRESS ALBERT VALENCIA - RV1 | TAX ID 1080 | INVOICE DATE 11/21/02 | INVOICE NO. E0CS88828 |
| | 1. AREA NO. | 2. CREDIT NO. | 3. MISC. CHG 33306 | 4. COLOR UNED PARCH |
| | 5. MAKE/MODEL DUCATI TRINKE/SCAPERIT | | 6. DELIV. DATE 08/21/01 | 7. DELIVERY MILE 14 |
| | 8. VEHICLE ID. NO. 1E9YU03181X C 2 3 1 0 8 | | 9. RETAILER SALES NO. | 10. PRODUCTION DATE |
| WEST HILLS, CA | | 11. REG. NO. | 12. REG. DATE 11/21/02 | |
| 13. PHONE NO. | 14. FAX NO. | 15. COMMENTS | | |

TOTALS-----

 * [] CASH [] CHECK CK NO. [] *
 * [] VISA [] MASTERCARD [] DISCOVER *
 * [] AMEX XPRESS [] OTHER [] CHANGE *

TOTAL LABOR..... 0.00
 TOTAL SALES..... 0.00
 TOTAL TAX..... 0.00
 TOTAL USE CON..... 0.00
 TOTAL TAX..... 0.00
 TOTAL INVOICE \$..... 0.00

THANK YOU FOR YOUR BUSINESS!!
 SALES DISTRIBUTION CODE 716211

CUSTOMER SIGNATURE

DUPLICATE INVOICE



MIDWAY FORD
 200 North Vermont Ave.
 Los Angeles, CA 90004
 (213) 385-1411

FLEET "HOT" LINE
 (213) 365-8105



SUZUKI
 OF
 LOS ANGELES



DAEWOO



ALTERNATIVE NO. 45-4 BEO0881 (REV) 3-84-1986



MIDWAY FORD
200 North Vermont Ave.
Los Angeles, CA 90004
(213) 385-1411



BAR #AD016796

EPA #CAD981159320

| | | | | |
|------------------------------|-------------------------------------|-------------------------------------|----------------------------|--------------------------|
| Customer No. 28380 | Technician ALBERT VALENCIA - R01 | Year 2006 | Invoice Date 1/2/03 | Invoice No. EPD080734 |
| Address [REDACTED] | City/State WEST HILLS, CA | Vehicle No. TEMYND3181K C 2310 E | Customer Name WED BARCH | Station No. 11497 |
| Business Phone [REDACTED] | Home Phone [REDACTED] | Vehicle Description [REDACTED] | Delivery Date 08/21/01 | Original Mileage 14 |
| Comments [REDACTED] | Invoice No. 12/06/02 | Prod. No. | Production Date | |

JOB 1 CHARGES

LABOR
JP 1 51F02 BODY ELECTRICAL TECH(S):215 WARRANTY
THE BATTERY LASH STAYS ON WHILE DRIVING
NO WORK PERFORMED CUSTOMER WILL BRING BACK

JOB 1 TOTALS
JOB 1 JOURNAL PREFIX F008 JOB 1 TOTAL 0.00

JOB 2 CHARGES

LABOR
JP 2 16F02 DRIVEABILITY TECH(S):185 WARRANTY
CUSTOMER WANTS THE VEHICLE TO BE DRIVEN ON
NO WORK PERFORMED CUSTOMER WILL BRING BACK

JOB 2 TOTALS
JOB 2 JOURNAL PREFIX F008 JOB 2 TOTAL 0.00

TOTALS

| | | |
|--|-------------------------|-------------|
| * [] CASH [] CHECK CK NO: [] | TOTAL LABOR | 0.00 |
| * [] VISA [] MASTERCARD [] DISCOVER | TOTAL TAX | 0.00 |
| * [] AMER XPRESS [] OTHER [] CHARGE | TOTAL DISC | 0.00 |
| | TOTAL VAT | 0.00 |
| | TOTAL INVOICE \$ | 0.00 |

THANK YOU FOR YOUR BUSINESS!!
SALES DISTRIBUTION CODE 730111

CUSTOMER SIGNATURE

DUPLICATE INVOICE



MIDWAY FORD
200 North Vermont Ave.
Los Angeles, CA 90004

(213) 385-1411

FLEET "HOT" LINE
(213) 365-8105



MADE IN THE U.S.A. BY THE U.S. AUTO INDUSTRY

TELEPHONE # 958794

677776

DUPLICATE 1

PAGE 1 OF 2



Galpin Ford

SERVICE INVOICE

15505 Rosser Blvd, North Hills, CA 91343 (818) 778-9172 FAX (818) 778-2164

OPEN MON. - FRI. 7:30 AM TO 8:00 PM SATURDAY 8:00 AM TO 2:00 PM

EPA # CAD 8948371

BAR # ACR11208 - BAR # RC811208

JAY: NIGHT:

SERVICE ADVISOR: 997821 Fox, Dean SEN : 4936

| COLOR | YEAR | MAKE AND MODEL | VIN | LICENSE | PLS NO. | | |
|-----------------|------------|-------------------------|-------------------|---------------|------------|-------------|-----------|
| Green | 2001 | Ford Escape XLT 5DR FWD | 1FMYU03181KC23108 | 4YBE387 CA | 4246 | | |
| IN SERVICE DATE | PROD. DATE | WARR. EXP. | PROMISED | PO NO. | RATE | PAYMENT | INV. DATE |
| | | | 12/28/02 17:00 | | | | 30Dec02 |
| R.O. OPENED | READY | STOCK NBR | TYPES | ACTIVATION DT | MILEAGE IN | MILEAGE OUT | |
| 27Dec02 17:18 | | | W | | 35261 | 35265 | |

Dear Valued Galpin Customer,

Ask your Service Advisor about our great prices on tires, shocks, brakes and preventive maintenance services.

| DESCRIPTION | TOTALS |
|-------------|--------|
| Amount Due | \$0.00 |

1 ~~CUT STATES SWIRL-SOUND-GRIND OIL RESERVE INTERMITTENT SURGES, LAUNGS, INTERMITTENT~~ / CC429
 SPECIAL ORDERED PARTS

\$0.00 \$0.00

SUBTOTAL PARTS \$0.00

SUBTOTAL LABOR \$0.00

SUBTOTAL \$0.00

2 IN / IN IN

\$0.00 \$0.00

SUBTOTAL PARTS \$0.00

SUBTOTAL LABOR \$0.00

SUBTOTAL \$0.00

3 CUT STATES COLLANT LIGHT IS ON / CC487 REPLACED COOLANT RESERVOIR

1 L8Z, 8A080, B3 TANK ASY - RAD SUPPLY

\$0.00 \$0.00

All parts new unless otherwise indicated. All oil sold in quarts. All antifreeze sold in quarts. All fluid sold in ounces.

| REV. EST. | ADJ. AMT. | NEW TOTAL | AUTH. BY | DATE | TAX | APPROVE |
|-----------|-----------|-----------|----------|------|-----|--------------------------|
| | | | | | | <input type="checkbox"/> |
| | | | | | | <input type="checkbox"/> |
| | | | | | | <input type="checkbox"/> |

NOTICE TO CONSUMER: PLEASE READ IMPORTANT INFORMATION ON BACK

X I acknowledge notice and oral approval of an estimate in the original estimated price.

X I acknowledge receipt of the parts and labor listed above.

CUSTOMER #: 998794

677776

DUPLICATE 1

PAGE 2 OF 2



Galpin Ford SERVICE INVOICE

18505 Foothill Blvd., North Hills, CA 91343
(818) 778-2172 FAX: (818) 778-2164
OPEN MON. - FRI. 7:00 AM TO 6:00 PM
SATURDAY 8:00 AM TO 6:00 PM

EPA # CAD 62842131

BAR # AC911288 - BAR # KC911288

SERVICE ADVISOR: 897821 For, Sean 888 4936

| COLOR | YEAR | MAKE AND MODEL | VIN | LICENSE | PLG NO. | | |
|-----------------|------------|-------------------------|-------------------|---------------|------------|-------------|-----------|
| Green | 2001 | Ford Escape XLT 5DR FWD | 1FMYU03181KC23108 | 4Y88387 CA | 4246 | | |
| IN SERVICE DATE | PRCD. DATE | WARR. EXP. | PROMISED | PO NO. | RATE | PAYMENT | INV. DATE |
| | | | 12/28/02 17:00 | | | | 30Dec02 |
| R.O. OPENED | READY | STOCK NBR | TYPES | ACTIVATION DT | MILEAGE IN | MILEAGE OUT | |
| 27Dec02 17:19 | | | W | | 35261 | 35265 | |

| TRK | HOURS | NET/CHG | TOTAL |
|-----------|-------|-----------------------|--------|
| 4 IN / TN | | | |
| | | \$0.00 | \$0.00 |
| | | SUBTOTAL PARTS | \$0.00 |
| | | SUBTOTAL LABOR | \$0.00 |
| | | SUBTOTAL | \$0.00 |

If you have any questions or concerns regarding this service visit,
Please call our Customer Service Hotline at (818) 756-3443.

All parts new unless otherwise indicated. All oil sold in quarts. All antifreeze sold in quarts. All fluid sold in ounces.

| ORD EST | ADDITIONAL AMT. | NEW TOTAL | AUTH BY | DATE | TIME | <input type="checkbox"/> BY PHONE <input type="checkbox"/> IN PERSON |
|---------|-----------------|-----------|---------|------|------|---|
| | | | | | | <input type="checkbox"/> BY PHONE <input type="checkbox"/> IN PERSON |
| | | | | | | <input type="checkbox"/> BY PHONE <input type="checkbox"/> IN PERSON |

**NOTICE TO CONSUMER: PLEASE READ
IMPORTANT INFORMATION ON BACK**

X _____
I acknowledge notice and oral approval of an increase in the original estimated price.

X _____
I acknowledge receipt of the parts and labor listed above.

Pawelek, Eileen (E.M.)

From: Pawelek, Eileen (E.M.)
Sent: Friday, January 24, 2003 12:43 PM
To: Taylor, Kenneth (K.L.)
Cc: Pawelek, Eileen (E.M.)
Subject: Attorney Demand

Hi Ken,

I'm handling an attorney demand letter for a Litigation Prevention case for the following customer. Please let me know if you've had any contact with them or would like to provide your input.

Thanks!

[REDACTED] Galpin Ford--2001 Escape--1FMYU03181KC23108--concerns with stalling; states five repairs for stalling.

Eileen Pawelek

Senior Legal Analyst

Consumer Affairs

Phone: 313 845 5483

Fax: 313 845 6002

2003

1358090562 PITTSBURGH

ER02-027.1 0730

CONSUMER AFFAIRS

| | DATE | TIME | TO/FROM | MODE | MIN/SEC | PGS | CHG# | STATUS |
|----|-------|-------|--------------|-------|---------|-----|------|--------|
| 03 | 12/17 | 15:58 | 215 548 8917 | EC--S | 00'18" | 001 | 027 | OK |



Consumer Affairs

PO Box 8248, MD 3NE-8
Dearborn, MI 48126 USA

Sent via Fax

December 17, 2003

Mr. Robert Silverman
Kimmel & Silverman
30 East Butler Pike
Ambler, PA 19002

RE: [REDACTED]
2001 Ford Escape
VIN: 1PMYU04131K792389

Dear Mr. Silverman:

This letter is in response to your letter dated November 17, 2003 regarding the above-mentioned client.

Ford Motor Company has reviewed your client's claim. Unfortunately, we are unable to offer any assistance at this time.

Thank you for the opportunity to review this concern.

Respectfully yours,

Ruth Davis
Consumer Affairs



Consumer Affairs

PO Box 6246, MD SNE-B
Dearborn, MI 48126 USA

Sent via Fax

December 17, 2003

Mr. Robert Silverman
Kimmel & Silverman
30 East Butler Pike
Ambler, PA 19002

RE: [REDACTED]
2001 Ford Escape
VIN: 1FMYU04131KF92389

Dear Mr. Silverman:

This letter is in response to your letter dated November 17, 2003 regarding the above-mentioned client.

Ford Motor Company has reviewed your client's claim. Unfortunately, we are unable to offer any assistance at this time.

Thank you for the opportunity to review this concern.

Respectfully yours,

Ruth Davis
Consumer Affairs



eccdb2x

*Jerry
Chappelle*

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 19-NOV-2003

Note: All Costs are in US Dollars

| VIN | AWS VL | WERS VL | MKT DER | BODY CAB | VEH SERIES | DRIVE TYPE | PLANT CD | TRANS CD | ENG COD | PROD DATE | WARR DATE | SELLING DEALER | BELL CNT | TIS | QTY | WCC | PREV | BASE | SUFF | VEH | VFG | CCC | CD | |
|-------------------|--------|--|---------|-----------------------------------|------------|-------------|----------|-----------|----------|------------|-----------|----------------|------------|----------------|-------------|-------------|------|----------|------|-----|-----|-----|----|--|
| 1FMYU04131KF92389 | MI | T/M1 | T/F | T/W | T/F | T/F | AJ | T/D1 | T/LD | 16-01-01 | 30-03-01 | 144003 | USA | 5 | * | 2005 | * | RBCAL | * | S11 | V42 | D21 | 42 | |
| AWS Claim Key: | | 296426 | Doc #: | 11578101 | Trx Code: | | 1 | Labr Hrs: | 3 | Labr Cost: | | | 31.53 | Material Cost: | 0 | Total Cost: | | 31.53 | | | | | | |
| Dir Cd-Sub Cd: | | 03760 | Name: | SHULTS FORD OF ALLISON PARK, INC. | Ph: | 412-4873680 | St: | PA | City Cd: | USA | Reg Cd: | NA | Repr Date: | 14-AUG-2001 | DIST(Mile): | 7985 | | | | | | | | |
| Cmp Comments: | | CUSTOMER STATES TRUCK STALLING WHEN DRIVING DOWN HILLS | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | CHECK FOR DTC AND FOUND NONE REPROGRAM PCM 1L8U1260AC | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU04131KF92389 | MI | T/M1 | T/F | T/W | T/F | T/F | AJ | T/D1 | T/LD | 16-01-01 | 30-03-01 | 144003 | USA | 12 | * | 7005 | FOAZ | 140089 | A | S11 | V42 | D21 | 42 | |
| AWS Claim Key: | | 7196320 | Doc #: | 120838A | Trx Code: | | 507 | Labr Hrs: | 5 | Labr Cost: | | | 28.65 | Material Cost: | 3.89 | Total Cost: | | 32.54 | | | | | | |
| Dir Cd-Sub Cd: | | 07320 | Name: | CHARAPP FORD NORTH | Ph: | 724-2942000 | St: | PA | City Cd: | USA | Reg Cd: | NA | Repr Date: | 01-MAR-2002 | DIST(Mile): | 18781 | | | | | | | | |
| Cmp Comments: | | VEHICLE STALLS WHILE DRIVING DOWN HILLS WHEN ENGINE IS WARM, INTERMITTANT, HAS HAPPENED ABOUT 5 TIMES SINCE OWNED | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | ROAD TESTED, UNABLE TO DUPLICATE CONCERN, PERFORMED EPC TEST SYSTEM PASSED, CHECKED FOR SERVICE MESSAGES, CHECKED PCM PER SSM 15589, HAS LATEST CALIBRATION, CHECKED PCM RELAY, REPLACED PCM RELAY | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU04131KF92389 | MI | T/M1 | T/F | T/W | T/F | T/F | AJ | T/D1 | T/LD | 16-01-01 | 30-03-01 | 144003 | USA | 12 | * | 6886 | * | 78431.90 | * | S06 | V07 | L15 | 69 | |
| AWS Claim Key: | | 1222221 | Doc #: | 120888C | Trx Code: | | ESM | Labr Hrs: | 2 | Labr Cost: | | | 11.46 | Material Cost: | 0 | Total Cost: | | 11.46 | | | | | | |
| Dir Cd-Sub Cd: | | 07320 | Name: | CHARAPP FORD NORTH | Ph: | 724-2942000 | St: | PA | City Cd: | USA | Reg Cd: | NA | Repr Date: | 01-MAR-2002 | DIST(Mile): | 18781 | | | | | | | | |
| Cmp Comments: | | HATCH STICKS WHEN OPENING | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | LUBED HATCH HINGES | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU04131KF92389 | MI | T/M1 | T/F | T/W | T/F | T/F | AJ | T/D1 | T/LD | 16-01-01 | 30-03-01 | 144003 | USA | 13 | * | 6Y20 | * | MISC | * | SXX | V00 | A9 | 82 | |
| AWS Claim Key: | | 8330748 | Doc #: | 23254801 | Trx Code: | | P01 | Labr Hrs: | 8 | Labr Cost: | | | 50.46 | Material Cost: | 541.18 | Total Cost: | | 591.64 | | | | | | |
| Dir Cd-Sub Cd: | | 03760 | Name: | SHULTS FORD OF ALLISON PARK, INC. | Ph: | 412-4873680 | St: | PA | City Cd: | USA | Reg Cd: | NA | Repr Date: | 12-APR-2002 | DIST(Mile): | 20249 | | | | | | | | |
| Cmp Comments: | | CUSTOMER STATES THAT THERE ARE SIDEWALL CRACKS IN 3 OF 4 TIRES, TIRES ARE FIRESTONE WILDERNESS H T 33 | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | | VERIFIED CONCERN, REPLACED ALL FOUR TIRES WITH GOODYEAR WRANGLER XTS TIRES PER PAUL BELOYE, CSM | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU04131KF92389 | MI | T/M1 | T/F | T/W | T/F | T/F | AJ | T/D1 | T/LD | 16-01-01 | 30-03-01 | 144003 | USA | 13 | * | 3084 | * | DIAG | * | S11 | V42 | D21 | 82 | |
| AWS Claim Key: | | 6134066 | Doc #: | 122175A | Trx Code: | | ESM | Labr Hrs: | 7 | Labr Cost: | | | 40.1 | Material Cost: | 0 | Total Cost: | | 40.1 | | | | | | |
| Dir Cd-Sub Cd: | | 07320 | Name: | CHARAPP FORD NORTH | Ph: | 724-2942000 | St: | PA | City Cd: | USA | Reg Cd: | NA | Repr Date: | 18-APR-2002 | DIST(Mile): | 20518 | | | | | | | | |

Cost 18,000

Cost

ENR-927.1 0741

[Handwritten mark]

Cost Comments: STALLED AT STOP, RESTARTED EASILY
Tech Comments: ROAD TESTED, CHECKED FOR STALLING, NONE OCCURRED, PERFORMED DEC TEST, KOEO, KOER, CONT, PASS, MONITORED ENGINE PIDS PER HOTLINE, CHECKED IAC, WITH IN SPECS FOR HD TLINE, NO FIX YET

1FMYU04131KF92389 MI T/M1 T/F D/WB D/BF T/F AJ T/D1 T/LD 16-01-01 30-03-01 144003 USA 13 * 7A01 * 10653 * S09 V83 G29 02
AWS Claim Key: #103387 Doc #: 122175B Trx Code: E03 Labor Hrs: 3 Labor Cost: 17.18 Material Cost: 0 Total Cost: 17.18
Dir Cd-Sub Cd: 07320-* Name: CHARAPP FORD NORTH Ph: 724-2942000 St: PA City: USA Reg Cd: NA Repr Date: 16-APR-2002 DIST(Mile):20511

Cost Comments: BATTERY LIGHT STAYS ON 2-3 MINUTES AFTER STARTING CAR, INTERMITTANT, MORE FREQUENT WHEN COLD OUT
Tech Comments: CHECKED FOR BATTERY LIGHT ON, UNABLE TO DUPLICATE CONCERN, RUN CHARGING SYSTEM TEST, OK, CHECKED OASIS FOR SERVICE MESSAGES, NONE FOUND, CHECKED CONNECTIONS, CONTACTED HOTLINE, NO FIX YET

1FMYU04131KF92389 MI T/M1 T/F D/WB D/BF T/F AJ T/D1 T/LD 16-01-01 30-03-01 144003 USA 15 * 3E03 YF1Z 9F715 AA S11 V42 D21 42
AWS Claim Key: 9047227 Doc #: 123376A Trx Code: S07 Labor Hrs: 1.9 Labor Cost: 111.23 Material Cost: 158.79 Total Cost: 270.02
Dir Cd-Sub Cd: 07320-* Name: CHARAPP FORD NORTH Ph: 724-2942000 St: PA City: USA Reg Cd: NA Repr Date: 03-JUN-2002 DIST(Mile):22613

Cost Comments: STALLS INTERMITTANTLY, SEE NOTE
Tech Comments: ROAD TESTED, CHECKED FOR STALLING, HOOKED UP NOS, RE-ROAD TESTED, MONITORED ENGINE PIDS, CHECKED FOR SERVICE MESSAGES TSB 02 & 6, MONITOR IAC, REPLACED IAC, RECHECKED STILL ABOVE SPECS, REPLACED THROTTLE BODY, RECHECKED, OK, MONITORED VAPOR MANAGEMENT VALVE STICKING, REPLACED VMV, CLEARED PCM MEMORY, RETESTED, OK

1FMYU04131KF92389 MI T/M1 T/F D/WB D/BF T/F AJ T/D1 T/LD 16-01-01 30-03-01 144003 USA 15 * 1F06 1L8Z 8A000 EB S09 V83 G29 42
AWS Claim Key: 9047228 Doc #: 123376B Trx Code: E04 Labor Hrs: 5 Labor Cost: 29.27 Material Cost: 51.55 Total Cost: 80.82
Dir Cd-Sub Cd: 07320-* Name: CHARAPP FORD NORTH Ph: 724-2942000 St: PA City: USA Reg Cd: NA Repr Date: 03-JUN-2002 DIST(Mile):22613

Cost Comments: LOW COOLANT LIGHT COMES ON
Tech Comments: VERIFIED CONCERN, REPLACED RECOVERY TANK PER TSB 01 13 01

1FMYU04131KF92389 MI T/M1 T/F D/WB D/BF T/F AJ T/D1 T/LD 16-01-01 30-03-01 144003 USA 16 * 2E04 * 9D653 * S11 V44 E29 28
AWS Claim Key: 9735184 Doc #: 124173A Trx Code: S07 Labor Hrs: 2.5 Labor Cost: 146.35 Material Cost: 0 Total Cost: 146.35
Dir Cd-Sub Cd: 07320-* Name: CHARAPP FORD NORTH Ph: 724-2942000 St: PA City: USA Reg Cd: NA Repr Date: 28-JUN-2002 DIST(Mile):23443

Cost Comments: CHECK ENGINE LIGHT ON
Tech Comments: WIS KOED DTC P0445 DCL DATALOGGER ROADTEST MONITOR RECORD PINPOINT PERFORM EVAP SYSTEM LEAK TEST PIN POINT LEAK EVAP ENGINE COMPARTMENT THIMBED HOSE END REPAIRED ROADTEST RETEST OK

1FMYU04131KF92389 MI T/M1 T/F D/WB D/BF T/F AJ T/D1 T/LD 16-01-01 30-03-01 144003 USA 16 * 5G04 YL8Z 5K483 AA S05 V39 N39 01
AWS Claim Key: 9210114 Doc #: 124173B Trx Code: E04 Labor Hrs: 1 Labor Cost: 58.54 Material Cost: 14.5 Total Cost: 73.04
Dir Cd-Sub Cd: 07320-* Name: CHARAPP FORD NORTH Ph: 724-2942000 St: PA City: USA Reg Cd: NA Repr Date: 28-JUN-2002 DIST(Mile):23443

Cost Comments: CUSTOMER STATES CREEKING NOISE FROM FRONT DRIVERS SIDE OF VEHICLE
Tech Comments: ROAD TEST CONFIRM COMPLAINT FOUND STABILER LINK BOBBING BAD REPLACE

Stall
Not mentioned

Any comments? You can contact

Last Visit 6/2002
Fix Available 11/2002

Not done back to Charapp

EM02-027.1 07A2

Update This Information In Stars

Dealer Detail

| FCSD Region | Sales Region | Sales Zone | Market | P&A Code | Sales Code |
|---------------|---------------|------------|--------|----------|------------|
| 44-PITTSBURGH | 44-PITTSBURGH | A | A2 | 03760 | F44003 |

Dealer Name: SHULTS FORD OF ALLISON PARK, I
 Dealer Address: 457B ROUTE 8
 ALLISON PARK PA 15101
 Dealer Main Phone: 412-487-3600

Dealer Service Phone: 412-487-3600

| Position | Employee Name |
|-----------------|----------------------|
| PARTS MANAGER | DEBORAH A SCHUESSLER |
| SALES MANAGER | RICHARD TROCCHIO |
| SALES MANAGER | DENNIS SCRIMA |
| SALES MANAGER | RICHARD H DENINNO |
| SALES MANAGER | DAVID N RIDINGS |
| SERVICE MANAGER | KELLY MOBREY |

EP82-827.1 8743


KIMMEL & SILVERMAN
 P.C.

Ruth

ROBERT M. SILVERMAN *
CRAIG THOR KIMMEL **

30 EAST BUTLER PIKE
AMBLER, PA. 19001

* ALSO MEMBER OF NEW YORK AND NEW JERSEY BARS
** ALSO MEMBER OF NEW YORK BAR
* ALSO MEMBER OF NEW JERSEY BAR

1-800-LIMON LAW
P (215) 540-8866
F (215) 540-8817

www.kimslaw.com

SHANNON LYAN
LINDSAY D. HOFFMAN
BRIAN T. GOLDENFARB
TAMMY J. SCHMITT

December 9, 2003

VIA TELEFAX ONLY
(313) 845-5555

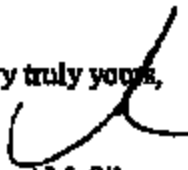
Mr. Vince Kirksey
Ford Consumer Affairs
16800 Executive Plaza Drive 3NE-301
Dearborn, Michigan 48126

NO OFFER ~ FINAL NOTICE

RE: [REDACTED] v. Ford Motor Company
2001 Ford Escape
VIN: 1FMYU04131KF92389
Zip Code: 15068
Selling Dealer: Shults Ford

Dear Mr. Kirksey:

Please accept this letter as confirmation that your client has still made no offer in the following matter/s. Please be advised that suit will be filed immediately, unless I hear from you that your investigation is on-going and your client needs more time to consider the matter, I will assume your offer remains unchanged. Although we may not be able to settle this case, I nevertheless appreciate the time you took to review the facts and discuss settlement with me.

Very truly yours,

Robert M. Silverman

RMS:vas

Davis, Ruth (R.I.)

From: Corlew, Randall (R.L.)
Sent: Wednesday, November 19, 2003 12:11 PM
To: Davis, Ruth (R.I.)
Cc: Daniluk Sr., John (J.J.); Vance, Steve (Stephen W.)
Subject: RE: [REDACTED]

Ruth,
This customer has not been to a Dealer since 6/2002 for anything per AWS. There is a TSB for this issue is below:

The TSB is dated - 11/14/2002 his last visit was 5 months before the fix was out.

Randy Corlew - FSE - Pittsburgh

Next/Previous Article (N/P): Article #: TSB 02-23-01 Date: 11/14/2002
Symptom: 8 07 7 83 DRVABL STALL/QUITS DECELERATION ALL ENGINE TEMP
Year Vt Fm Vt Mdl Trans Engine Callb Axle
Criteria: 2001 T MR

01-03 ESCAPE-BLT B4 9/02--STALL/RESTRT-RPL TSB 02-11-08
SOME VEHICLES EQUIPPED WITH THE 3.0L DURATEC ENGINE MAY EXHIBIT AN INTERMITTENT ENGINE QUIT AND RESTART CONDITION. THIS IS USUALLY A ONE-TIME EVENT DURING CLOSED THROTTLE DECELERATION WITH NO DIAGNOSTIC TROUBLE CODES (DTCs) AND NO MALFUNCTION INDICATOR LAMP (MIL). DUE TO THE INTERMITTENT NATURE OF THE CONDITION AND THE MULTIPLE POTENTIAL CAUSES OF THE CONDITION, THE COMPLETE TSB CHECKLIST AND ALL APPROPRIATE PART REPLACEMENTS SHOULD BE PERFORMED REGARDLESS OF WHETHER THE CONDITION CAN BE DUPLICATED BY THE TECHNICIAN. OTHERWISE, CUSTOMERS MAY EXPERIENCE THE INTERMITTENT CONDITION AND BE FORCED TO RETURN TO THE DEALERSHIP. IF THE VEHICLE IS NO LONGER ELIGIBLE FOR WARRANTY COVERAGE, DISCUSS THIS SERVICE WITH THE CUSTOMER BEFORE PERFORMING.

---Original Message---

From: Davis, Ruth (R.I.)
Sent: Wednesday, November 19, 2003 10:33 AM
To: Corlew, Randall (R.L.)
Subject: [REDACTED]

Hi Randy,

I have received an attorney demand for lemon law on this vehicle. If you have any information that will assist me, please let me know.

Thanks - don't work too hard. :)

| | | | |
|--|---------------------------|-------------------------------|------------------|
| VIN: 1FMYU04131KF92388 | Year: 2001 | Model: ESCAPE | Case: 1358090562 |
| Name: [REDACTED] | Owner Status: Original | WSD: 2001-03-30 | |
| Symptom Desc: STALL/QUITS ACCELERATION ALL ENGINE TEMP | | Primary Phone: 724-334-6894 | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: 724-295-2288 | |
| Issue Type: 07 LEGAL | Issue Status: ACKNOWLEDGE | | |

| | | | |
|--|-------------------|---|--|
| Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND | | | |
| Dealer: 03760 SHULTS FORD OF ALLISON PARK, I | | Origin Desc: CA-LITIGATION PREVENTION-FRONT | |
| DESK | | | |
| Odometer: 1 MI | Comm Type: FAX | | |
| Analyst Name: KOKOSZKA, DELPHINE (D.M.) | Analyst: DKOKOSZK | | |



webmaster

ER02-027.1 0749

Action Date: 11/18/2003

Action Time: 14.44.55.071

Action Date: Yes

Comments *****ATTORNEY DEMAND***** FAX RECEIVED NOVEMBER 17, 2003, ATTORNEY ALLEGES CLIENT'S VEHICLE HAS CHRONIC STALLING CONDITIONS. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Ruth Davis

Litigation Prevention Analyst

Pittsburgh Region

Phone 313-845-5539

Fax 313-845-5555

Customer info

Customer: [REDACTED] Primary Phone: [REDACTED] Secondary Phone: [REDACTED]

Address: [REDACTED] NEW KENSINGTON PA [REDACTED]

Country: USA Language: EN

Call Phone: [REDACTED] Pager: [REDACTED]

Preferred Contact method: Fax: [REDACTED]

Preferred Contact Time: Email: [REDACTED]

ERR2-827.1 8748

VIN
1FMYU04131KF92389

Year Model
2001 ESCAPE
Open Issues Exist

Vehicle List
Sales Type
INDIVIDUAL RTL

Owner Status
Original Owner

Vehicle Info
Oasis
Warranty History

ENR2-027.1 0749

ESP / Recall Information

VIN: 1FMYU04131KF92389

No ESP information for this VIN

Recall Information

| Number | Type | Description | Campaign | Status | Status Date | Dealer Code |
|--------|------|--------------|----------|----------------------|-------------|-------------|
| 02ND1 | O | EGR PRES SEN | | RELEASED FOR MAILING | 2003-01-11 | F44469 |

ENR2-027.1 0700

Davis, Ruth (R.I.)

To: Corlew, Randall (R.L.)
Subject: Como

Hi Randy,

I have received an attorney demand for lemon law on this vehicle. If you have any information that will assist me, please let me know.

Thanks - don't work too hard. :)

| | | | |
|--|---------------------------|-----------------------------|------------------|
| VIN: 1FMYU04131KF2366 | Year: 2001 | Model: ESCAPE | Case: 1358080562 |
| Name: [REDACTED] | Owner Status: Original | NSD: 2001-03-30 | |
| Symptom Desc: STALL/QUITS ACCELERATION ALL ENGINE TEMP | | Primary Phone: [REDACTED] | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: [REDACTED] | |
| Issue Type: 07 LEGAL | Issue Status: ACKNOWLEDGE | | |

| | | | |
|--|--|---|--|
| Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND | | | |
| Dealer: 03760 SHULTS FORD OF ALLISON PARK, I | | Origin Desc: CA-LITIGATION PREVENTION-FRONT | |
| DESK | | | |

| | | | |
|---|---------------------------|------------------|--|
| Mileage: 1 MI | Comm Type: FAX | | |
| Analyst Name: KOKOSZKA, DELPHINE (D.M.) | Analyst: DKOKOSZK | | |
| Action Date: 11/18/2003 | Action Time: 14.44.56.071 | Action Date: Yes | |

Comments: ***** ATTORNEY DEMAND ***** FAX RECEIVED NOVEMBER 17, 2003. ATTORNEY ALLEGES CLIENT'S VEHICLE HAS CHRONIC STALLING CONDITIONS. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Ruth Davis

Litigation Prevention Analyst
Pittsburgh Region
Phone 313-845-5539
Fax 313-845-5555

1358090562

44

Ruth ✓
Ad



ROBERT M. SILVERMAN *
CRAIG THOR KIMMEL **

* ALSO MEMBER OF NEW YORK AND NEW JERSEY BARS
** ALSO MEMBER OF NEW YORK BAR
* ALSO MEMBER OF NEW JERSEY BAR

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JACQUELINE C. HERRITT
ROBERT A. RAFFIN
VIVIAN BENZ PERKIN
AMY D. COX
LOUIS DOBA, JR.
SHANNON M. KYAN
LINDSAY D. HOFFMAN
BRIAN T. GOLDENFARB**
TAMMY J. SCHMITT

November 17, 2003

VIA TELEFAX ONLY
(313) 845-5555

Mr. Vince Kirksey
Ford Consumer Affairs
16800 Executive Plaza Drive 3NE-301
Dearborn, Michigan 48126

RE: [REDACTED] v. Ford Motor Company
2001 Ford Escape
VIN: 1FMYU04131KF92389
Zip Code: 15068
Selling Dealer: Shultz Ford

Dear Mr. Kirksey:

Please take notice that I represent the captioned individual in his claim against Ford. Please take the steps necessary to advise all Ford Personnel and dealership personnel that I am [REDACTED] counsel and there should be no contact with my client, except for contact necessary to implement current repair attempts. I am writing this letter as an effort to work out a pre-litigation settlement and any attempts to contact my client directly will result in the immediate filing of suit and a request for an injunction and sanctions.

As you will notice from your Warranty History as well as any dealership records you review, my client's vehicle is a presumptive lemon. Specifically, the vehicle has been serviced by Shultz Ford for chronic stalling conditions.

ED82-827.1 0782

Vince Kirksey
November 17, 2003
Page -2-

Plaintiff hereby demands the statutory repurchase of the vehicle, plus payment of counsel fees and costs in the bottom line amount of \$1,500.00. I would also be willing to discuss a vehicle swap, but only if the terms are favorable to my client, who is a loyal Ford Customer.

Please be advised that suit will be filed if we have not reached a settlement on or before 12/8/03. In the meantime, please call or write me if you need any additional information or documentation.

Very truly yours,



Robert M. Silverman

RMS:vas

2003

0561381973 PITTSBURGH

EM62-827.1 8754



6600 PEARL RD.
PARMA HTS., OHIO 44139
416-858-2500

3116

DEAL 18138

CUST 5247273

DATE 03/12 20 02

PURCHASER'S NAME [REDACTED]
STREET ADDRESS [REDACTED]
CITY & STATE SEVEN HILLS, OH

MAR 14 2002

COUNTY CUYA RESIDENCE PHONE [REDACTED]

SOC. SEC. # 275584271 WORK PHONE # _____ VEHICLE BEING PURCHASED NEW USED DEMO RENTAL REPURCHASE

| | | | | | | |
|------|------|-----------------|----|-----------------|-----|--------------|
| YEAR | MAKE | MODEL OR SERIES | LT | COLOR | TRM | STOCK NUMBER |
| 2002 | FORD | ESCAPE | LT | TRUE BLUE CLEAR | | TS31416 |

| | | | | | |
|----------|-------------------|---|--|------------------|------------|
| INTERIOR | 1FMYJ03182K061942 | ODOMETER MILEAGE ON VEHICLE TO BE PURCHASED | <input type="checkbox"/> ACCURATE <input type="checkbox"/> NOT ACCURATE | DATE OF PURCHASE | 03/12/2002 |
|----------|-------------------|---|--|------------------|------------|

| | | |
|----------------------------|-----------------------|----------|
| OPTIONAL EQUIPMENT LISTING | CASH PRICE OF VEHICLE | 28546.00 |
|----------------------------|-----------------------|----------|

THIS ORDER SUPERCEDES & VOIDS ALL PREVIOUS ORDERS.
EQUIPPED AS PER WINDOW STICKER WITH THE FOLLOWING EXCEPTIONS:

10377

| | |
|---|----------|
| EXTENDED SERVICE CONTRACT | N/A |
| INTERIOR PROTECTOR | N/A |
| PANT SEALANT | N/A |
| RUSTPROOFING | N/A |
| DOCUMENTARY FEE | N/A |
| TOTAL | 28546.00 |
| TAX | 1445.22 |
| <input type="checkbox"/> TEMPORARY TAG <input type="checkbox"/> LICENSE <input type="checkbox"/> LIC. TRANSFER <input type="checkbox"/> TITLE <input type="checkbox"/> REGISTRATION | 29.00 |
| TOTAL CASH DELIVERED PRICE | 30020.22 |

| | |
|---|--------|
| CASH DEPOSIT SUBMITTED WITH ORDER - RECEIPT # | 500.00 |
| ADDITIONAL DEPOSIT - RECEIPT # | 611.22 |

| | |
|-------------------------------------|-----|
| ALLOWANCE FOR TRADE-IN AS APPRAISED | N/A |
| PAID OFF | N/A |

| | | | | | | | |
|-------------------------------|----------------------|--|-----------------------------------|---|------------------------------|---------------|--------|
| LESS BALANCE OWING TO: | TITLE | BY | NET EQUITY | N/A | | | |
| DESCRIPTION OF TRADE IN | YEAR | MAKE | MODEL | YEAR | TITLE | TOTAL CREDITS | 551.22 |
| VEHICLE IDENTIFICATION NUMBER | RELEASED ON TRADE-IN | <input type="checkbox"/> ACCURATE <input type="checkbox"/> NOT ACCURATE | TRADE-IN IS NOT A SALVAGE VEHICLE | <input type="checkbox"/> YES <input type="checkbox"/> NO | CASH BALANCE DUE ON DELIVERY | 13509.00 | |

THIS IS A CASH TRANSACTION, AS SUCH IT IS THE PURCHASER'S SOLE RESPONSIBILITY TO MAKE HIS OWN FINANCING ARRANGEMENTS. HOWEVER, IF THE PURCHASER AT TIME OF DELIVERY, AS A MATTER OF CONVENIENCE, PREFERENCES TO HAVE THE DEALER HANDLE THE UNPAID BALANCE AS A TRUE SALES TRANSACTION, THE PURCHASER AGREES TO EXECUTE SUCH SECURITY AGREEMENT AND PROMISSORY NOTE AS MAY BE REQUIRED.

NO ORAL REPRESENTATIONS HAVE BEEN MADE TO THE PURCHASER AND ALL TERMS OF THE AGREEMENT ARE PRINTED ON WRITTEN FRONT AND BACK. I CERTIFY THAT I AM EIGHTEEN (18) YEARS OF AGE OR OVER AND HEREBY ACKNOWLEDGE RECEIPT OF THE ORDER.

I state that odometer mileage on the VEHICLE ON ORDER described above is _____ at time of transfer.
(Check the following statements, if applicable)
 I further state that the actual mileage differs from the odometer reading for reasons other than odometer calibration error and that the actual mileage is unknown.
THIS ORDER IS NOT VALID UNLESS SIGNED AND ACCEPTED BY DEALER OR HIS AUTHORIZED REPRESENTATIVE.

The purchaser hereby irrevocably appoints any officer and/or assistant officer of dealer and/or authorized agent as an attorney-in-fact to execute any and all necessary documents that may be required by any individual firm, or corporation, in order to implement and complete the transaction for the purchase of the vehicle, as set forth in the within purchase agreement and in order to effectuate the purpose and intent of the purchaser and the dealer.

APPROVED: [Signature] 3/12/02

X [Signature] 3/12/02

0002-027.1 0758

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 27-ACG-2003
 Note: All Costs are in US Dollars

| VIN | AWS VL | WERS VL | MKT DER | BODY CAB | VEH SERIES | DRIVE TYPE | PLANT CD | TRANS CD | ENG COD | PRD DATE | WARR DATE | SELLING DEALER | SELL CNT | TIS | QRT | WCC | PREF | BASE | SUFF | VRT | VRG | CCC | CD |
|-----------------------|---|---------|------------------------------|-----------|-------------|------------|----------|-------------|---------|--------------|-----------|----------------|-------------|-------------|--------|------|------|---------|------|-----|-----|-----|----|
| 1FMYU03182KC61942 | M1 | T/M1 | T/F | T/WB | T/EF | T/A | AJ | T/DJ | T/LD | 01-03-02 | 12-03-02 | 144124 | USA | 1 | * | 6N01 | * | 5425556 | * | S07 | V75 | B63 | 33 |
| AWS Claim Key: | 933725 | Doc #: | 054530A | Trx Code: | | | 1 | Labour Hrs: | 1 | Labour Cost: | 6.64 | Material Cost: | 1.4 | Total Cost: | 8.04 | | | | | | | | |
| Dir Cd-Sub Cd: | 03273 | Name: | LIBERTY FORD SOUTHWEST, INC. | Ph: | 440-8822600 | St: | OH | City: | USA | Reg Cd: | NA | Repr Date: | 23-MAR-2002 | DIST(Mile): | 321 | | | | | | | | |
| Cost Comments: | C S THAT THEY ARE MISSING A RUBBER STOP FOR REAR WINDOW | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | REPLACE RUBBER BUMPER | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03182KC61942 | M1 | T/M1 | T/F | T/WB | T/EF | T/A | AJ | T/DJ | T/LD | 01-03-02 | 12-03-02 | 144124 | USA | 4 | * | 2E04 | YLKZ | 9C915 | AA | S11 | V42 | D21 | 42 |
| AWS Claim Key: | 183845 | Doc #: | 060185A | Trx Code: | | | S07 | Labour Hrs: | 2.4 | Labour Cost: | 166.8 | Material Cost: | 29.64 | Total Cost: | 196.44 | | | | | | | | |
| Dir Cd-Sub Cd: | 03273 | Name: | LIBERTY FORD SOUTHWEST, INC. | Ph: | 440-8822600 | St: | OH | City: | USA | Reg Cd: | NA | Repr Date: | 08-JUL-2002 | DIST(Mile): | 3381 | | | | | | | | |
| Cost Comments: | C S THAT THE CAR STALLED BETWEEN 40 45 MPH A C WAS ON CAR RESTARTED FINR | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | EBC TEST NO CODES CK FUEL PRESSURE NORMAL PERFORM TSB REPLACE IAC AND REPROGRAM PCM | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03182KC61942 | M1 | T/M1 | T/F | T/WB | T/EF | T/A | AJ | T/DJ | T/LD | 01-03-02 | 12-03-02 | 144124 | USA | 4 | * | 6H06 | * | 1621411 | * | S06 | V09 | G05 | 42 |
| AWS Claim Key: | 1854042 | Doc #: | 060585B | Trx Code: | | | 1 | Labour Hrs: | 5 | Labour Cost: | 34.75 | Material Cost: | 0 | Total Cost: | 34.75 | | | | | | | | |
| Dir Cd-Sub Cd: | 03273 | Name: | LIBERTY FORD SOUTHWEST, INC. | Ph: | 440-8822600 | St: | OH | City: | USA | Reg Cd: | NA | Repr Date: | 08-JUL-2002 | DIST(Mile): | 3381 | | | | | | | | |
| Cost Comments: | C S THAT THE DRIVERS FRONT WINDOW MAKES A GLASS ON GLASS NOISE AT TOP | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | REMOVE TRIM PANEL AND SECURE LOOSE GLASS MOUNT | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03182KC61942 | M1 | T/M1 | T/F | T/WB | T/EF | T/A | AJ | T/DJ | T/LD | 01-03-02 | 12-03-02 | 144124 | USA | 7 | * | 2B03 | YLKZ | 9E926 | DA | S11 | V42 | D21 | 42 |
| AWS Claim Key: | 2202713 | Doc #: | 064617A | Trx Code: | | | S07 | Labour Hrs: | 2.1 | Labour Cost: | 145.95 | Material Cost: | 129.15 | Total Cost: | 275.1 | | | | | | | | |
| Dir Cd-Sub Cd: | 03273 | Name: | LIBERTY FORD SOUTHWEST, INC. | Ph: | 440-8822600 | St: | OH | City: | USA | Reg Cd: | NA | Repr Date: | 19-SEP-2002 | DIST(Mile): | 5639 | | | | | | | | |
| Cost Comments: | C S THAT THE CAR STALLED OUT AROUND 40 MPH ON A SLIGHT DECLINE 3RD TIME IN. | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | EBC TEST NO CODES CK FUEL PRESSURE REPLACE IAC AND MASS AIR FLOW SENSOR REPLACE EEC RELAY AND RE TEST | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU03182KC61942 | M1 | T/M1 | T/F | T/WB | T/EF | T/A | AJ | T/DJ | T/LD | 01-03-02 | 12-03-02 | 144124 | USA | 13 | * | 1P06 | ILKZ | 8A800 | EB | S09 | V83 | G29 | 42 |
| AWS Claim Key: | 4925813 | Doc #: | 072046A | Trx Code: | | | B04 | Labour Hrs: | 5 | Labour Cost: | 34.75 | Material Cost: | 53.34 | Total Cost: | 88.09 | | | | | | | | |
| Dir Cd-Sub Cd: | 03273 | Name: | LIBERTY FORD SOUTHWEST, INC. | Ph: | 440-8822600 | St: | OH | City: | USA | Reg Cd: | NA | Repr Date: | 15-MAR-2003 | DIST(Mile): | 11736 | | | | | | | | |
| Cost Comments: | CUST STATES THE COOLANT LIGHT IS COMING ON AND STAYING ON WHEN FIRST STARTING THE TRUCK, STAYS ON FOR 3 5 MIN THEN GOES OFF | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | VERIFIED CONCERN FOUND COOLANT SENSOR SHORTED REPLACED COOLANT BOTTLE RETESTED OK. | | | | | | | | | | | | | | | | | | | | | | |

① ST

4241 Mile
 Stale
 TCR

③ ST

ENR2-827.1 8787

11MYU03182KC61942 MI T/M1 T/F T/WE T/EF T/A AJ T/DJ T/LD 01-03-02 12-03-02 144124 USA 13 * 5V10 2L8Z 2162 AA S10 V21 H19 42
 AWS Claim Key: 4923854 Doc #: 072946B Trx Code: E84 Labor Hrs: 1 Labor Cost: 6.95 Material Cost: 13.9 Total Cost: 20.85
 Dir Cd-Sub Cd: 03273-* Name: LIBERTY FORD SOUTHWEST, INC. Ph: 440-882600 St: OH City: USA Reg Cd: NA Rptg Date: 15-MAR-2003 DBST (Mile): 11736
 Cust Comments: BRAKE LIGHT IS COMING ON INT
 Tech Comments: VERIFIED CONCERN FOUND MASTER CYLINDER RESERVOIR CAP LEAKING REPLACED CAP RETESTED OK

11MYU03182KC61942 MI T/M1 T/F T/WE T/EF T/A AJ T/DJ T/LD 01-03-02 12-03-02 144124 USA 17 * 2B04 YL8Z 9C915 AA S11 V42 D21 42
 AWS Claim Key: 7022252 Doc #: 072885A Trx Code: S07 Labor Hrs: 2 Labor Cost: 143.87 Material Cost: 29.64 Total Cost: 173.51
 Dir Cd-Sub Cd: 03273-* Name: LIBERTY FORD SOUTHWEST, INC. Ph: 440-882600 St: OH City: USA Reg Cd: NA Rptg Date: 16-JUL-2003 DBST (Mile): 16176
 Cust Comments: C S THAT THE CAR STALLED TODAY AROUND 42 MPH WHILE GOING DOWN A HILL
 Tech Comments: BSC TEST PDI POINT TEST PID MONITOR TEST CK PUEL REPROGRAM PCM REPLACE VAPOR MANAGEMENT VALVE AND RE TEST PER TSB *4* *After*

Any comments? You can contact



webmaster

ERR2-827.1 8756

DEALER

441 124 VIN 1FMYU03182KC61942

SUGGESTED RETAIL PRICE MSRP

TB31416

U03C ESCAPE XLT 4X2
2002 MODEL YEAR
L2 TRUE BLUE CLEARCOAT METALLIC
22 M GRAPH PREM CLTH SPT BUCK

22250.00 20663.00

KEY STANDARD EQUIPMENT

- .ORDER CODE 310A
- .P235/70/RX16 A/S OWL TIRES
- .16" CAST ALUMINUM WHEELS
- .POWER 6-WAY DRIVERS SEAT
- .NON-MACH AM/FM 6 DISC IN-DASH
- .4-WHEEL ANTILOCK BRAKE SYSTEM
- .PRIVACY GLASS

OPTIONAL EQUIPMENT

- 991 .3.0L DURATEC V6 ENGINE NC
- 444 .4-SPEED AUTOMATIC D/O TRANS NC
- 183 FRONT LICENSE PLATE BRACKET NC
- 186 STEP BARS 275.00

248.00

TOTAL VEHICLE & OPTIONS 22525.00
DESTINATION & DELIVERY 565.00
SCHEDULE A (MEMO) .00

20911.00
565.00

TOTAL FOR VEHICLE

23090.00

06 U.S. GAL GAS FACTORY

9.00

PRICED DORA
BATCH-ID 2022202039 N R8 2X
PRICE LEVEL 240300003
SHIPPING WEIGHT 3090 LBS.

VIN: 1FMYU03182KC61942

13 _____
 11600 _____
 11500 _____
 71900 (_____)
 11500 _____
 70400 (_____)
 20000 _____

TB31416

0944X

| FINANCE ASSIGNMENT | INVOICE TOTAL | SALES TAX | SALES DISCOUNT | NET TOTAL | A PLAN |
|-----------------------|------------------|--------------|-------------------|--------------|-----------|
| 225.00 | 21710.00 | 676.00 | 190.00 | 20844.00 | 20646.00 |
| 676.00 | 8.00 | 248.00 | .00 | 668.00 | 20473.00 |

SOLD TO
Liberty Ford Southwest, Inc. 441124
6600 Peori Road
Parma Heights OH 44130

SHIP TO IF OTHER THAN ABOVE

| | | | |
|----|------|----------|---------------|
| TO | BY | DATE | RF98 |
| 2 | 6 OH | 02/22/02 | 44-0325 22 06 |

SHIP THROUGH



DAVID J. HORVATH
ATTORNEY AT LAW

7100 E. PLEASANT VALLEY RD., SUITE 105
INDEPENDENCE, OHIO 44131
TELEPHONE: 216-988-0860
FAX: 216-988-0861

August 20, 2003

Ford Motor Company
Consumer Affairs
PO Box 6248, MD-3NE-B
Dearborn, MI 48126

Trace:
561 321 973
Region: 44
M.H. CA

RE: Vehicle Number 1FMYU03182KC1942 owned by [REDACTED]

Dear Consumer Affairs:

I am writing to make formal demand for settlement 1375.01 et seq. of the Ohio Revised Code.

Liberty

My client purchased a vehicle from Liberty Ford that have, on four occasions, jeopardized her personal safety. A complaint already sent as well as the repair history. The problem is apparent in this vehicle. The vehicle "stalls" appears your company is well aware of this problem and memorandums to its dealers.

\$1500.00 104

To date her attempts to be "made whole" have the best the dealership would offer is a replacement car at a price this is not acceptable.

Now Roof
Color

I am sure you will agree that this car is a "lemon". I would hope we can resolve this with little more than a replacement and my office.

John [Signature]

Demand is hereby made for a replacement vehicle at no cost to her, plus attorney fees of \$2000.00. At this juncture she will waive her expenses related to her loss of use of the vehicle, time lost from work and other emotional distress related injuries in the event we can settle this immediately. Please advise me immediately if this matter can be so resolved. We are more than happy to have the car inspected at your request. However, we cannot consider this car safe to drive and respectfully request it be returned as asked.

Very truly yours,

[Signature]
David J. Horvath

CONSUMER AFFAIRS
SECTION

DJH:mv
Enc.

[REDACTED]
SEVEN HILLS, OHIO
[REDACTED]

August 4, 2003

Ford Motor Company
Customer Relation Center
16800 Executive Plaza Drive
PO Box 6248
Dearborn, MI 48121

Gentlemen:

I purchase a new 2002 Ford Escape in March of 2002. I love me car/suv except that I am scare to death of driving it now.

After I drove the above for about three months, it stalled while driving around 40 some mites per hour. Took it in Liberty Ford, they mentioned that there were some instances that has happened to a few Escapes and Ford has put out a flier as to what to fix, they said it could be a number of things, and that they would take a look at it.

About a month later it stalled while I was going downhill and trying to make a turn, unfortunately I was unable to slow down enough and no power steering so I ended up on the lawn trying to avoid an uncoming truck. It was really scary, the dealer said they will try another item that might be the problem, they also told me that I was the only one that came back after it was fixed.

In September (month later) it happened again, now this was getting a little too close for comfort. I explained that it was scare driving not knowing when or were it stalls. Getting off a freeway ramp downhill and not being able to turn is a frightening experience that I did not care to go through again. They explained that Ford had one more flier that specified another item to fix. This should do it for sure this time. Again they said that I was the only one that came back for a third time. If I was the only one, then why was Ford putting out flyers that this might happen?. They reassure me that everything should be OK.

On July 16, 2003, while I was going downhill towards an intersection, the light was red with many cars (three lanes including turning lane) stopped in front of it. I did not even realized that the car was stalled, as it has been a few months since, and I had assumed everything was fixed. I tried to slow down the car, and realized that it was not slowing down, I then looked at my dashboard about 43 miles per hour and the oil light was on. It took me a few seconds to realized that it had stalled again, cars to my right, I could not get into the curb lane to make a turn on the lawn, and I knew I could not stop in time without hitting the cars ahead, I choose to cross the median and hope I could get across into a driveway before the uncoming traffic could hit me. Unfortunately when you have no power steering nor gas, you just pray real hard, and then cry and thank the Lord when you manage to ONE MORE TIME get lucky and come out of it without any damages.

[REDACTED]
SEVEN HILLS, OHIO
[REDACTED]

This stops right here. I am not willing to gamble any more. I talked to our nephew who is the Chief of Police in Broadview Hts, Ohio , and he told me I should not be driving the car. I talked my neighbor who is a judge in Cuyahoga County, and he advised me not to drive either.

I have contacted a lawyer after trying numerous times to talk to the manager at Liberty with the only remedy that they can give me is to sell me another new car for an additional \$4,5000.00. They told me that Ford does not get involved in this matters, that they leave it to the dealer.

I have contacted AUTOCAP, copy of their letter enclosed, after two weeks, I have not heard anything. Before I let the attorney try to help me get me some results, I found your address in my warranty book and thought I would try one more time. But please respond ASAP, as I need transportation, and am scars to keep driving, especially with the kids in the car. If there is no word as to what can be done, I have to go ahead with the lawsuit, as I have already over 16,000 miles and I don't have any guarantee that the problem has been solved.

I have enlosed the related copies of the repair invoices and AUTOPCAP's letter. Please, please help me!!! I would like all my money refunded plus all the interest I paid on the loan thus far and time lost form work, or a new 2003 Escape with no additional cost to me. I talked my daughter into buying a 2003 Escape and my neighbor and they have had the car for almost a year with no related problems.

[REDACTED]

5247273

78805



LIBERTY FORD SOUTHWEST, Inc.
 8800 Pearl Road - Parma Heights, Ohio 44130
 Phone: 440-888-2800
 Toll Free: 800-793-6283
 Fax: 440-888-3181
 www.libertyford.com

INVOICE

SEVEN HILLS, OH
 HOME: [REDACTED]

PAGE 1

SERVICE ADVISOR: 7143 BRIAN CALES

| COLOR | YEAR | MAKE/MODEL | VIN | LICENSE | MI/AGE IN/OUT | TAG | |
|-----------|-----------|-------------|-------------------|---------|---------------|---------|-----------|
| TRUE BLUE | 02 | FORD ESCAPE | 1FMYU03182KC61942 | | 16176/16176 | | |
| DEL. DATE | PRD. DATE | WARR. EXP. | PROMISED | PG NO. | RATE | PAYMENT | INV. DATE |
| 12MAR2002 | 25FEB02 | | WAIT 16JUL03 | | | CASH | 15JUL03 |

| REG. OPENED | READY | OPTIONS: | | | | | |
|---------------|---------------|--|------|-------|------|-----|-------|
| 09:15 16JUL03 | 13:32 16JUL03 | STK: T931416 DLR: 032736 ENG: 3.0L DURATEC V6 ENGINE TRN: 4-SPEED AUTOMATIC O/D TRANS 1/7/8/03 | | | | | |
| LINE | OPCODE | TECH | TYPE | HOURS | LIST | NET | TOTAL |

CAUSE: THE CAR STALLED TODAY AROUND 42 MPH WHILE GOING DOWN A HILL
 CAUSE: REC TEST PIN POINT TEST PID MONITOR TEST CK FUEL REPROGRAM PCM
 REPLACE VAPOR MANAGEMENT VALVE AND R E TEST PER TSB

| | | | | | | | |
|----------|-----------------------------------|--|--|--|--|--|-------|
| 12650D | REC (QUICK TEST) - DIAGNOSIS - L | | | | | | (N/C) |
| 12650D15 | VALVE ASY-FL VAPOR PURGE SELEN | | | | | | (N/C) |
| 6800 | W94 | | | | | | (N/C) |
| 12650D22 | VALVE ASSEMBLY-FUEL VAPOR STORAGE | | | | | | (N/C) |
| 6800 | W94 | | | | | | (N/C) |
| 12650D22 | VALVE ASSEMBLY-FUEL VAPOR STORAGE | | | | | | (N/C) |
| 6800 | W94 | | | | | | (N/C) |
| 12650D22 | VALVE ASSEMBLY-FUEL VAPOR STORAGE | | | | | | (N/C) |
| 6800 | W94 | | | | | | (N/C) |
| 12650D22 | VALVE ASSEMBLY-FUEL VAPOR STORAGE | | | | | | (N/C) |
| 6800 | W94 | | | | | | (N/C) |

PART#: YL8Z*9C915*AA
 COUNT:
 CLAIM TYPE:
 AUTH CODE:
 6800

CUSTOMER COPY

IMPORTANT

You may receive a customer satisfaction survey from Ford Motor Co. in the next few weeks. If for any reason you cannot grade us a "10" (Completely Satisfied), please contact the Service Department at Liberty Ford - Lincoln - immediately. Your satisfaction is our No. 1 concern. Thank You.

(440) 888-2800

STATEMENT OF DISCLAIMER

The factory warranty conditions all of the warranties with respect to the sale of this item. The Seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item.

CUSTOMER SIGNATURE

| 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 |

5247273

64617



LIBERTY FORD SOUTHWEST, Inc.
6500 Pearl Road - Parma Heights, OH 44130
Phone: 440-888-2800
Toll Free: 800-793-8263
Fax: 440-888-3181
www.libertyford.com

INVOICE

SEVEN HILLS, OH
HOME:

PAGE 2

SERVICE ADVISOR: 7143 BRIAN CALES

| | | | | | |
|---|-----------|-------------|-------------------|-------------|----------------|
| DATE | TIME | DESCRIPTION | VEHICLE | INVOICE NO. | DATE |
| TRUE BLUE | 02 | FORD ESCAPE | 1FMYU03182KC61942 | 5639/5639 | T7813 |
| NEW DATE | PROD DATE | WARRANTY | MAKE | MODEL | FIN. DATE |
| 12MAR2002 | 25FEB02 | | | | |
| 18:00 | 19SEP02 | | | CASH | 20SEP2002 |
| OPTIONS: STK:TB31416 DLR:032736 | | | | | |
| ENG:3.0L DURATEC V6 ENGINE | | | | | |
| TRN:4-SPEED AUTOMATIC O/D TRANS 113/23/03 | | | | | |
| 17:43 | 19SEP02 | 12:00 | 20SEP02 | | |
| LINE | OPCODE | TECH | TYPE | HOURS | |
| | | | | | LIST NET TOTAL |

AUTO CODE:

RENTAL 0

CUSTOMER COPY

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CUSTOMER SIGNATURE

| | |
|------------------------|------|
| LABOR AMOUNT | 0.00 |
| PARTS AMOUNT | 0.00 |
| GAS, OIL, LUBE | 0.00 |
| BUSBY 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 |

EP92-027.1 8754

CUSTOMER COPY

*PART FOR RANGER CAME IN TODAY -
CAN SCHEDULE APPT *

5247273

64617



LIBERTY FORD SOUTHWEST, Inc.
6900 Pearl Road - Parma Heights, Ohio 44130
Phone: 440-888-2800
Toll Free: 800-783-8283
Fax: 440-588-3181
www.LibertyFord.com

INVOICE

SEVEN HILLS, OH
HOME: [REDACTED]

PAGE 1

SERVICE ADVISOR: 7143 BRIAN CALES

| | | | | | |
|-----------|---------|-------------|-------------------|-----------|-----------|
| TRUE BLUE | 02 | FORD ESCAPE | 1FMYU0318ZKC61942 | 5639/5639 | T7813 |
| 12MAR2002 | 25FEB02 | | 18:00 19SEP02 | CASE | 20SEP2002 |

OPTIONS: STK:TB31416 DLR:032736
ENG:3.0L DURATEC V6 ENGINE
TRN:4-SPEED AUTOMATIC O/D TRANS 113/23/03

| LINE | OPCODE | TECH | TYPE | HOURS | LIST | NET | TOTAL |
|------|--------|------|------|-------|------|-----|-------|
|------|--------|------|------|-------|------|-----|-------|

| | | | | | | | |
|--|--|--|--|---|--|--|-------|
| | | | | TIME IN. | | | |
| | | | | SENSOR REPLACE REC RELAY AND RR TEST | | | |
| | | | | 6800 W94 | | | (N/C) |
| | | | | 1 YL8Z*9E926*DA BDY ASY-AIR INTK CHG THROT | | | (N/C) |
| | | | | 12650D45 PIN POINT TEST - DIAGNOSIS - L | | | |
| | | | | 12650D80 DCL DISPLAY - TEST - L | | | |
| | | | | 12650DB1 RECORDER/MONITOR ROAD TEST - DIAGNOSIS - | | | |
| | | | | 6800 W94 | | | (N/C) |
| | | | | DIAGNOSIS (9A407/9E307/9350) - L | | | (N/C) |
| | | | | 12650DX1 EBC (QUICK TEST) - DIAGNOSIS - L EXTRA | | | |
| | | | | 6800 W94 | | | (N/C) |
| | | | | REPLACE (9F670/9F715) - L | | | (N/C) |
| | | | | 9926A THROTTLE BODY - AIR INTAKE - REPLACE | | | |
| | | | | 6800 W94 | | | (N/C) |
| | | | | (12A646/12B577/14N089/9345) - L | | | |

CUSTOMER COPY

FC: D21 42

COUNT:

==IMPORTANT==

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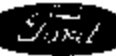
CUSTOMER SIGNATURE

| | |
|------------------------|--|
| LABOR AMOUNT | |
| PARTS AMOUNT | |
| GAS, OIL, LUBE | |
| SMOKE AMOUNT | |
| MISC. CHARGES | |
| TOTAL CHARGES | |
| LESS INSURANCE | |
| SALES TAX | |
| PLEASE PAY THIS AMOUNT | |

5247273



6 2 3 0 5



LIBERTY FORD SOUTHWEST, Inc.
8400 Pearl Road - Parma Heights, Ohio 44130
Phone: 440-888-2800
Toll Free: 800-783-8283
Fax: 440-888-3181
www.libertyford.com

INVOICE

PAGE 1

SEVEN HILLS, OH
HOME: [REDACTED]

SERVICE ADVISOR: 7143 BRIAN CALES

| | | | | | | |
|--------------------------------|----------|---|-------|-------------------|----------|-----------------|
| COLOUR | YEAR | MAKE | MODEL | VIN | STOCK NO | PRICE |
| TRUE BLUE | 02 | FORD ESCAPE | | 1FMYU03182KC61942 | | 4241/4241 25569 |
| DEL DATE | REG DATE | WARRANTY | | | | |
| 12MAR2002 | 25FEB02 | | 20:00 | 07AUG02 | | CASH 08AUG2002 |
| E.O. 12812 | | OPTIONS: STK:TB31416 DLR:032736 | | | | |
| 17:50 | | 07AUG02 | | 14:56 | | 08AUG02 |
| ENGINE: 3.0L DURATEC V6 ENGINE | | TRN: 4-SPEED AUTOMATIC O/D TRANS 1) 3/23/03 | | | | |
| LINE | OPCODE | TECH | TYPE | HOURS | LIST | NET TOTAL |

10000 PERFORM TSB UPDATE

RENTAL 0

CUSTOMER COPY

1002-027.1 8706

IMPORTANT

You may receive a customer satisfaction survey from Ford Motor Co. in the next few weeks. If for any reason you cannot grade us a "10" (Completely Satisfied), please contact the Service Department at Liberty Ford - Lincoln - Huron immediately. Your satisfaction is our No. 1 concern. Thank You.

(440) 888-2800

STATEMENT OF DISCLAIMER

The factory warranty constitutes all of the warranties with respect to the sale of this automobile. The Seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this automobile.

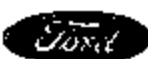
CUSTOMER SIGNATURE

| | |
|------------------------|------|
| 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 |

CUSTOMER COPY

5247273

60585



LIBERTY FORD SOUTHWEST, Inc.
3600 Pearl Road - Parma Heights, Ohio 44130
Phone: 440-888-2600
Toll Free: 800-783-6283
Fax: 440-888-3181
www.libertyford.com

INVOICE

PAGE 2

SERVICE ADVISOR: 7143 BRIAN CALES

SEVEN HILLS, OH
HOME:

| | | | | | |
|-------------|-----------|---------------------------------|-------------------|----------------------------|-------------------|
| MAKE | YEAR | MODEL | VIN | SALES | DATE |
| CRUIER BLUE | 02 | FORD ESCAPE | 1FMYU03182KC61942 | 3381/3381 | 13678 |
| DEL DATE | FROM DATE | TO DATE | TIME | PAID | BY DATE |
| 12MAR2002 | 25FEB02 | 17:30 | 08JUL02 | CASH | 09JUL2002 |
| PRO STARTED | READY | OPTIONS: STK:TB31416 DLR:032736 | | | |
| 15:45 | 08JUL02 | 16:12 | 09JUL02 | ENG:3.0L DURATEC V6 ENGINE | |
| LINE | | OPCODE | TECH | TYPE | HOURS |
| | | 8800 | W94 | | |
| | | | | | (N/C) |
| | | | | | (21410/21411) - L |

FC: G05 42

COUNT:

AUTH CODE:

CUSTOMER COPY

== IMPORTANT ==

You may receive a customer satisfaction survey from Ford Motor Co. In the next few weeks. If for any reason you cannot grade us a "10" (Completely Satisfied), please contact the Service Department at Liberty Ford - Lincoln - immediately. Your satisfaction is our No. 1 concern. Thank You.

(440) 888-2600

STATEMENT OF DISCLAIMER

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CUSTOMER SIGNATURE

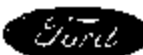
| | |
|------------------------|------|
| LABOR AMOUNT | 0.00 |
| PARTS AMOUNT | 0.00 |
| GAS, OIL, LUBE | 0.00 |
| SMILET AMOUNT | 0.00 |
| MISC. CHARGES | 0.00 |
| TOTAL CHARGES | 0.00 |
| LESS INSURANCE | 0.00 |
| SALES TAX | 0.00 |
| PLEASE PAY THIS AMOUNT | 0.00 |

ENC-027.1 0767

CUSTOMER COPY

5247273

60585



LIBERTY FORD SOUTHWEST, Inc.
8900 Pearl Road - Parma Heights, Ohio 44130
Phone: 440-888-2600
Toll Free: 800-793-8283
Fax: 440-888-3181
www.libertyford.com

INVOICE

PAGE 1

SEVEN HILLS, OH
HOME: [REDACTED]

SERVICE ADVISOR: 7143 BRIAN CALES

| YEAR | MAKE | MODEL | VIN | TRIM | LINE | DATE |
|-----------|---------|--------|-------------------|---------|-----------|-----------|
| 02 | FORD | ESCAPE | 1FMYU03182KC61942 | | 3381/3381 | 13678 |
| 12MAR2002 | 25FEB02 | | 17:30 | 08JUL02 | CASH | 09JUL2002 |

15:45 08JUL02 16:12 09JUL02
 OPTIONS: STR:TB31416 DLR:032736
 ENG:3.0L DURATEC V6 ENGINE
 TRN:4-SPEED AUTOMATIC O/D TRANS 1)3/23/03

| LINE | OPCODE | TECH | TYPE | HOURS | LIST | NET | TOTAL |
|------|--------|------|------|-------|------|-----|-------|
|------|--------|------|------|-------|------|-----|-------|

RESTARTED FINE

IAC AND REPROGRAM PCM

6800 W94 (N/C)

12650D45 PIN POINT TEST - DIAGNOSIS - I

12650D80 DCL DISPLAY - TEST - I

12650D81 RECORDER/MONITOR ROAD TEST - DIAGNOSIS -

6800 W94 (N/C)

REPLACE (9F670/9F715) - I

12650D84 PCM REPROGRAMMING - TEST - I

9350B FUEL PUMP PRESSURE TEST ON VEHICLE -

6800 W94 (N/C)

6800 W94 (N/C)

PART#: YL8Z*9C915*AA

CLAIM TYPE:

6800

B/C/S THAT THE DRIVER'S FRONT WINDOW HAS A CRACK ON GLASS NEAR TOP
 CAUSE FROM TRIM PANEL AND SECURE ROSSER'S MOUNT

23943A TRIM PANEL - FRONT DOOR - REMOVE AND

IMPORTANT

You may receive a customer satisfaction survey from Ford Motor Co. In the next few weeks. If for any reason you cannot grade us a "10" (Completely Satisfied), please contact the Service Department at Liberty Ford - Lincoln - immediately. Your satisfaction is our No. 1 concern. Thank You.

(440) 888-2600

STATEMENT OF DISCLAIMER

The factory warranty constitutes all of the warranties with respect to the sale of this item/terms. The dealer hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Dealer neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/terms.

CUSTOMER SIGNATURE

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

CUSTOMER COPY

EA82-827.1 8758

AUTOCAP

Automotive Consumer Action Program

A Public Service Of

THE GREATER CLEVELAND AUTOMOBILE DEALERS' ASSOCIATION

10100 Brookville Road • Brookville, Ohio 44141

(440) 746-1500 • FAX (440) 746-1504

E-Mail: gcada@gcada.org

July 21, 2003

[REDACTED]
Seven Hills, OH [REDACTED]

Dear [REDACTED]

Thank you for bringing your automotive complaint to our attention, and we regret any inconvenience you may have been caused by events that prompted the letter.

On 7/21/03 your complaint was forwarded to Liberty Ford Southwest and we asked that they respond in writing within ten (10) business days. The dealership's response will be forwarded to your attention once it is received in our office. If the dealership does not respond within ten (10) business days a final notice is sent to them. If they do not respond to the final notice, your complaint file will be presented to the AUTOCAP Panel for their review. The Panel, made up of volunteers from the Better Business Bureau, the Consumer Protection Agency, Channel 8 Call for Action, and two owners of GCADA member dealerships, meets on a voluntary basis once a month.

Please let us know if any changes occur in your case. We will keep you informed of all actions, meetings and decisions.

Thank you for contacting AUTOCAP. If you have any questions about this voluntary third party mediation program, please feel free to contact me at (440) 746-1500 or via email at kvaughn@gcada.org.

Sincerely,


Katie Vaughn
AUTOCAP Director

MARK VALLEIN

AUTOCAP

Automotive Consumer Action Program

Local AUTOCAP Address:

Greater Cleveland Automobile Dealers' Association
10100 Brecksville Road
Brecksville OH 44141
(440) 746-1500 FAX (440) 746-1504

Your Name and Address

[Redacted]
Seven Hills - OH [Redacted]
[Redacted]

Dealer Name and Address

LIBERTY FORD SOUTHWEST
6600 PEARL RD
PARMA HTS - OH 44130
440-888-2600

Name of person you dealt with: RON - ADAM - CLIFF
MGR SALES STAFF

Vehicle Information

Make: 2002 FORD Model: FORD ESCAPE Vehicle Identification No. (VIN): 1FM4YD3182KC61942
Year: 2002 Purchase: New Used From: LIBERTY FORD
Mileage at purchase: 6 Present Mileage: 16,800 Date purchased: 3-12-2002

DESCRIPTION OF YOUR COMPLAINT

CAR STALLS WHEN GOING DOWN HILL BETWEEN 40-45 MPH - WAS IN SHOP - JULY 2002 - said Ford was having a problem but knew what to fix - happened again in Aug 2002 was almost hit by a truck as I turn in front of turn and stalled. Again on Sep. 2002, and since that everything was fixed FORD had a memo on what part to replace. It stalled again July 2003 - going downhill - red light ahead with cars - crossed over median to avoid hitting another car. I AM SEEKING THE FOLLOWING REMEDIES OR ADJUSTMENTS:

I WOULD LIKE MY MONEY BACK THAT I PAID FOR THE CAR. OR A BRAND NEW "2003 ESCAPE" ~~2002~~ ~~PEARL RD~~ ~~PARMA HTS~~ ~~OH~~ ~~44130~~ ~~440-888-2600~~ I DON'T FEEL SAFE IN THIS VEHICLE ANYMORE EVERYTIME I GO 40 MILES - TRY MY BRAKES IN FEAR THAT IT'S GOING TO STALL

Please Attach:
Copies of repair orders, receipts, and other papers relevant to your case.

HELP ME PLEASE!!!

Your Signature

YOU AND THE LAW

Ohio's Lemon Law gives car buyers rights to refund of expenses

Special to The Plain Dealer



Automotive
Special

There's nothing like getting a brand new car. But what happens if, after driving it for a while, you discover that it really is a lemon?

If you find that you bought a "chronically defective new automobile," Ohio law gives you important rights. Once your car qualifies as a "lemon," the manufacturer is required to accept its return and either replace it or issue a full refund.

But what are you really entitled to receive? Are you limited to your purchase price? Or can you require the manufacturer to cover your related expenses, such as costs for a tow, a rental vehicle, your finance charges and any legal fees involved in fighting the manufacturer?

As Ohio's Supreme Court made it clear in a case last month, Ohio's Lemon Law is intended to be liberally construed in order to "make consumers whole."

When you lease or buy a new car, Ohio's Lemon Law gives you the right to cancel if one or more significant defects arise within the earlier of one year or 18,000 miles. The defect must violate an express warranty and substantially impair the use, safety or value of the vehicle.

No new car is defect-free. You have to give the maker or dealer a reasonable chance to correct the problem.

The law presumes that the manufacturer or dealer has had a reasonable chance to fix the vehicle if, within one year or 18,000 miles, any of the following occur:

- 1) The shop has had three chances to fix the same problem without success.
- 2) The vehicle has been out of service for repairs for a total of at least 30 days (they do not have to be consecutive).
- 3) There have been eight or more attempts to repair any substantial defects.
- 4) There has been at least one unsuccessful attempt to repair a problem so severe that you are likely to be seriously injured or killed if you continue to drive the vehicle.

Tom
du 3/2-2673

means, it qualifies as a lemon. At that point, you may choose to obtain a full refund. What does that include?

Clearly, you're entitled to the contract price, including charges for undercoating, dealer-installed options and accessories, dealer service, preparation and delivery charges, and sales tax, license and registration fees.

But that's not all. The law is designed "to restore the purchaser to a position he or she occupied before acquiring the lemon." So a consumer is entitled to a refund of expenses related to the car's defects, such as charges for towing, vehicle rental, meals and lodging.

On June 2, 1998, Susan Collins bought a 1999 Ford Mustang Cobra convertible from Mullins East Inc. for \$27,999, which was financed using her home-equity line of credit. She filed a lawsuit on June 8, 1999. Ford Motor Co. agreed that the car was a lemon, and Mullins was dismissed from the case.

A trial was held on the issue of \$500 in damages. The judge awarded her \$40,361. In addition to the full price of \$27,999, she was also awarded other costs, including attorney fees, vehicle inspection and report, court costs and interest charges on her home equity loan.

The 11th Ohio District Court of Appeals (Lake County) affirmed this result last month. The court's decision recognizes that Ohio's Lemon Law is broadly intended to protect consumers from losses resulting from a defective vehicle. The law "must have teeth in order to be effective," it said.

For aggravated auto owners, this decision should provide a welcome finish to the sour taste left from owning a lemon.

Bealich is a partner in the law firm of Bealich & Solomon in Pepper Pike. He also is host of "Golden Opportunities," a television show dealing with issues of interest to people 50 and older, at 11:30 a.m. Saturdays on WXXO Channel 3.

To reach Armand Bealich: info@bealich.com

Update This Information In Stars

Dealer Detail

| | | | | | |
|---------------|---------------|------------|--------|----------|------------|
| FCSD Region | Sales Region | Sales Zone | Market | P&A Code | Sales Code |
| 44-PITTSBURGH | 44-PITTSBURGH | 1 | C2 | 03273 | F44124 |

Dealer Name: LIBERTY FORD SOUTHWEST, INC.
 Dealer Address: 8800 PEARL ROAD
 PARMA HEIGHTS OH 44130
 Dealer Main Phone: 440-888-2600

Dealer Service Phone: 440-888-2600

| Position | Employee Name |
|--------------------------|------------------|
| GENERAL MANAGER | E. GARY LAUGHLIN |
| GENERAL MANAGER | DALE GREGORY |
| PARTS MANAGER | JEFF T MILHORN |
| PARTS & SERVICE DIRECTOR | CLIFFORD WARNER |
| SALES MANAGER | RICHARD SHAGOVAC |
| SALES MANAGER | JOHNITHAN A MAY |

FRANK MURPHY

ENR2-827.1 8773



9/1/09

ATTN Ruth,

Here is a copy of the buyers agreement and the original factory invoice.

The [redacted] financed with their credit union - therefore as far as liberty Ford is concerned this was a cash deal...

We received \$6611.22 cash down plus \$15,500.00 from the credit union.

Frank Murphy

Liberty Ford Southwest

2002-027.1 0774

| | | | | | |
|---|--|--|--|--|---|
| VERMILION Ford Lincoln Mercury 4215 E. Liberty Ave. VERMILION, OH 44009 (440) 967-6191 | MAPLE HEIGHTS Ford 5900 Wampanoag Center Rd. MAPLE HTS, OH 44137 (216) 882-FORD | PARMA HEIGHTS Ford 8800 Pearl Blvd PARMA HEIGHTS, OH 44130 (440) 880-2600 | SOLOM Ford 32811 Aurora Road SOLOM, OH 44130 (440) 248-1850 | INDEPENDENCE Lincoln Mercury 5700 Rockside Road @ 177 INDEPENDENCE, OH 44131 (216) 824-0770 | VERMILION Chrysler Dodge Jeep 4385 E. Liberty Ave VERMILION, OH 44009 (440) 967-3109 |
|---|--|--|--|--|---|

TOLL FREE 1-888-FORD-247



9/15/03

ATTN Ruth,

Here is a copy of the buyers agreement and the original factory invoice.

The [redacted] financed with their credit union - therefore as far as liberty Ford is concerned this was a cash deal... We received \$6611.22 cash down plus \$15,500.00 from the credit union.

Frank Murphy
Liberty Ford Southwest

5802-027.1 0775

| | | | | | |
|--|--|---|--|--|--|
| VERMILION Ford Lincoln Mercury 4215 E. Liberty Ave. VERMILION, OH 44089 (440) 987-6191 | MAPLE HEIGHTS Ford 5500 Warrensville Center Rd. MAPLE HTS, OH 44137 (216) 882-FORD | PARMA HEIGHTS Ford 8900 Pearl Road PARMA HEIGHTS, OH 44130 (440) 888-2500 | SOLON Ford 32611 Aurora Road SOLOON, OH 44138 (440) 248-1880 | INDEPENDENCE Lincoln Mercury 6700 Rockside Road # 1-77 INDEPENDENCE, OH 44131 (216) 524-0770 | VERMILION Chrysler Dodge Jeep 1366 E. Liberty Ave VERMILION, OH 44089 (440) 987-3108 |
|--|--|---|--|--|--|

TOLL FREE 1-800-FORD-247

DEALER

441 124 VIN 1FMYU031B2KC61942

TB31416

U03C ESCAPE XLT 4X2
2002 MODEL YEAR
L2 TRUE BLUE CLEARCOAT METALLIC
22 M GRAPH PREM CLTH SPT BUCK

22250.00 20663.00

KEY STANDARD EQUIPMENT
.ORDER CODE 310A
.P235/70/RX16 A/S OWL TIRES
.16" CAST ALUMINUM WHEELS
.POWER 6-WAY DRIVERS SEAT
.NON-MACH AM/FM 6 DISC IN-DASH
.4-WHEEL ANTILOCK BRAKE SYSTEM
.PRIVACY GLASS

OPTIONAL EQUIPMENT
991 .3.0L DURATEC V6 ENGINE
444 .4-SPEED AUTOMATIC O/D TRANS
153 FRONT LICENSE PLATE BRACKET
186 STEP BARS
TOTAL VEHICLE & OPTIONS
DESTINATION & DELIVERY
SCHEDULE A (MEMO) .00

NC NC
NC NC
NC NC
275.00 248.00
22525.00 20911.00
565.00 565.00

TOTAL FOR VEHICLE 23090.00

06 U.S. GAL GAS FACTORY 9.00
PRICED DORA
BATCH-ID 2822202039 N RB 2X
PRICE LEVEL 240500U03
SHIPPING WEIGHT 3090 LBS.

VIN: 1FMYU031B2KC61942

13 _____
11600 _____
11500 _____
71900 (_____) _____
11500 _____
70400 (_____) _____
20000 _____

TB31416

0944X

| THE PRICE MAY NOT REFLECT THE FINAL COST OF THE VEHICLE IN VIEW OF THE POSSIBILITY OF FUTURE CHANGES, ALLOWANCES, CREDITORS' AND INCENTIVE AMOUNTS FROM FORD MOTOR COMPANY TO THE DEALER. | | | | | |
|---|------------------|--------------|------------------|----------------------------------|-----------|
| FINANCE ADJUSTMENT | INVOICE TOTAL | SALES TAX | SALES USE TAX | SALES REGISTRATION & TITLE | A PLAN |
| 225.00 | 21710.00 | 676.00 | 190.00 | 20864.00 | 20646.00 |

676.00 0.00 248.00 .00 668.00 20473.00

SOLD TO
Liberty Ford Southwest, Inc. 441124
6600 Pearl Road
Parma Heights OH 44130

SHIP TO IF OTHER THAN ABOVE

| | | | |
|----|------|------|---------------|
| TO | BY | DATE | RF98 |
| 2 | 6 OH | | |
| 02 | 22 | 02 | 66-0325 22 06 |

SHIP THROUGH

0902-027.1 0775



3/1/0

REQ. 10/1/05 CREDIT 03/2/05

PURCHASER'S NAME: [REDACTED]
STREET ADDRESS: [REDACTED]
CITY & STATE: REVENUE MILLS, OH
COUNTY: CUYA
RESIDENCE PHONE: [REDACTED]

MAR 14 2002

REG. SLC. # [REDACTED] WORK PHONE # [REDACTED] VEHICLE BEING PURCHASED [] NEW [X] USED [] DPMO [] RENTAL REPURCHASE

MAKE: FORD MODEL: ESCAPE YEAR: 2001 COLOR: BLUE CLOTH: YES

ODOMETER MILEAGE ON VEHICLE TO BE PURCHASED: [REDACTED] ACCURATE: [] NOT ACCURATE: []

CASH PRICE OF VEHICLE: 29540.00

A PLAN

THIS ORDER SUPERSEDES & VOIDS ALL PREVIOUS ORDERS.
ENTERED ON DEP WINDOW STICKER WITH THE FOLLOWING EXCEPTIONS:

10327

EXTENDED SERVICE CONTRACT
INTERIOR PROTECTION
PAINT SEALANT
RUBBER FOOTING
DOCUMENTARY FEE

TOTAL: 29540.00
TAX: 1075.00

[] TEMPORARY TAG [] LICENSE [] LIC. TRANSFER [] TITLE [] REGISTRATION

TOTAL CASH DELIVERED PRICE: 30615.00

CASH DEPOSIT SUBMITTED WITH ORDER - RECEIPT # [REDACTED]

ADDITIONAL DEPOSIT - RECEIPT # [REDACTED]

ALLOWANCE FOR TRADE IN AS APPROPRIATE: 0.00

PAKOFF: 0.00

LEAVE BALANCE OWING TO: [REDACTED] TILL: [REDACTED] BY: [REDACTED]

Table with columns: DESCRIPTION OF TRADE-IN, MAKE, MODEL, YEAR, MILEAGE, NET EQUITY, TOTAL CREDIT, UNPAID BALANCE DUE ON DELIVERY

THIS IS A CASH TRANSACTION, AS SUCH IT IS THE PURCHASER'S SOLE RESPONSIBILITY TO MAKE HIS OWN FINANCING ARRANGEMENTS. HOWEVER, IF TITLE PURCHASER AT TIME OF DELIVERY, AS A MATTER OF CONVENIENCE, PERMITS TO HAVE THE DEALER HANDLE THE FINANCIAL BALANCE AS A TIME SALES TRANSACTION, THE PURCHASER AGREES TO EXECUTE SUCH VALIDITY AGREEMENT AND PROMISSORY NOTE AS MAY BE REQUIRED.

NO (X)RA REPRESENTATIONS HAVE BEEN MADE TO THE PURCHASER AND ALL TERMS OF THE AGREEMENT ARE PRINTED OR WRITTEN FRONT AND BACK. I CERTIFY THAT I AM EIGHTY-FIVE (85) YEARS OF AGE OR OVER AND HEREBY ACKNOWLEDGE RECEIPT OF THE ORDER.

I agree that odometer mileage on the VEHICLE ON ORDER described above is [] correct at time of transfer.

[] I check the foregoing statement, if applicable.
[] I further state that the actual mileage differs from the odometer reading for reasons other than odometer calibration error and that the actual mileage is [REDACTED].

THIS ORDER IS NOT VALID UNLESS SIGNED AND ACCEPTED BY DEALER OR HIS AUTHORIZED REPRESENTATIVE.

The purchaser hereby irrevocably appoints any officer and/or manager, officer of dealer and/or authorized agent as an attorney-in-fact in exact any and all necessary documents that may be required by any individual, firm, or corporation, in order to implement and complete the transaction for the purchase of the vehicle, as set forth in the within purchase agreement and in order to effectuate the purpose and intent of the purchaser with the dealer.

SALESMAN: [REDACTED]
APPROVED BY: [Signature] 3/12/02

[Signature] 3/12/02

8002-027-1 0777



ESP Recall information

VIN: 1FMYU03182KC61942

No ESP information for this VIN

No Recall information for this VIN

BP02-027.1 0770

| VIN | Year | Model | Sales Type | Owner Status | Vehicle Info |
|---|------|--------|--------------|----------------|---------------------------------------|
| 1FMYU03182KC61942 | 2002 | ESCAPE | A/Z PLAN RTL | Original Owner | No Open Issues Warranty History |
|  1MECM534XNG615410 | 1992 | SABLE | A/Z PLAN RTL | Original Owner | No Open Issues No Warranty History |
|  1MECM5349MG619768 | 1991 | SABLE | A/Z PLAN RTL | Original Owner | No Open Issues No Warranty History |

ENR2-827.1 8778

CONSUMER AFFAIRS

| DATE | TIME | TO/FROM | MODE | MIN/SEC | PGS | CHG# | STATUS |
|------|-------------|----------------------|------|---------|-----|------|--------|
| 23 | 09/11 14:13 | David J. Horvath Co. | G3-S | 00'53" | 003 | 032 | OK |



rd

Fax Cover Sheet

TO: David Horvath
COMPANY: Attorney at Law
PHONE: 216-986-0860
FAX: 216-986-0861

FROM: Ruth Davis
COMPANY: Ford Motor Company, Consumer Affairs Office
PHONE: 313-845-5539
FAX: 313-845-5555

Date: 09/10/2003

Number of Pages: 3
(including cover)

COMMENTS: [REDACTED]

Mail Address:

Ford Consumer Affairs
16800 Executive Parkway
P.O. Box 6248
MD 3NE-B
Dearborn, MI 48126



rid

Fax Cover Sheet

TO: David Horvath
COMPANY: Attorney at Law
PHONE: 216-986-0860
FAX: 216-986-0861

FROM: Ruth Davis
COMPANY: Ford Motor Company, Consumer Affairs Office
PHONE: 313-845-5539
FAX: 313-845-5555

Date: 09/10/2003

Number of Pages: 3
(including cover)

COMMENTS: [REDACTED]

Mail Address:

Ford Consumer Affairs
16800 Executive Parkway
P.O. Box 6248
MD 3NE-B
Dearborn, MI 48126

All Action Details for Issue

Print

VIN: 1FMYU03182KC81942

Year: 2002

Model: ESCAPE

Case: 561381973

Name: [REDACTED]

Owner Status: Original

W60: 2002-03-12

Symptom Desc: STALL/QUITS AT CRUISE ALL ENGINE TEMP

Reason Desc: LEGAL - OTHER ATTORNEY DEMAND

Primary Phone: [REDACTED]

Issue Type: 07 LEGAL

Issue Status: OPEN

Secondary Phone: [REDACTED]

Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND

Dealer: 03273 LIBERTY FORD SOUTHWEST, INC.

Origin Desc: CA-LITIGATION PREVENTION-FRONT DESK

Odometer: 16176 MI

Comm Type: MAIL

Analyst Name: LEICH,CHERIE

Analyst: CLEICH

Action Date: 08/28/2003

Action Time: 09.57.34.883

Action Date: Yes

Comments *****ATTORNEY DEMAND***** DATE STAMPED 8-25-03. ATTORNEY ALLEGES CLIENT'S VEHICLE HAS BEEN SERVICED FOR A STALLING CONDITION. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Data Element Name

Data Value

NAME OF LAW FIRM

DAVID . HORVATH ATTORNEY AT LAW

ATTORNEY NAME

DAVID J. HORVATH

ATTORNEY PHONE NUMBER

2168660660

ENR2-627.1 0782

Davis, Ruth (R.I.)

To: Ozbolt, Thomas (T.W.)
Cc: Goodhart II, Dennis (D.P.)
Subject: Blasko

Hi,

I have received an attorney demand for lemon law on this vehicle. If you have any information that would assist me with a decision, please let me know.

Thank you,

| | | | |
|---|------------------------|-----------------------------|-----------------|
| VIN: 1FMYU03182KC81842 | Year: 2002 | Model: ESCAPE | Case: 561381873 |
| Name: [REDACTED] | Owner Status: Original | WSD: 2002-03-12 | |
| Symptom Desc: STALL/QUITS AT CRUISE ALL ENGINE TEMP | | Primary Phone: [REDACTED] | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: [REDACTED] | |
| Issue Type: 07 LEGAL | Issue Status: OPEN | | |

| | | | |
|--|---------------------------|---|--|
| Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND | | | |
| Dealer: 03273 LIBERTY FORD SOUTHWEST, INC. | | Origin Desc: CA-LITIGATION PREVENTION-FRONT | |
| DESK | | | |
| Odometer: 18178 MI | Comm Type: MAIL | | |
| Analyst Name: LEICH, CHERIE | Analyst: CLEICH | | |
| Action Date: 08/25/2003 | Action Time: 09.57.34.883 | Action Date: Yes | |

Comments: ***** ATTORNEY DEMAND ***** DATE STAMPED 8-25-03. ATTORNEY ALLEGES CLIENT'S VEHICLE HAS BEEN SERVICED FOR A STALLING CONDITION. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Ruth Davis
Litigation Prevention Analyst
Pittsburgh Region
Phone 313-845-5539
Fax 313-845-5555

Davis, Ruth (R.I.)

From: Goodhart II, Dennis (D.P.)
Sent: Wednesday, August 27, 2003 9:40 AM
To: Davis, Ruth (R.I.)
Subject: RE: [REDACTED]

The vehicle was indeed in 3 times for repairs on that concern. The first two times in was before the "fix" was released on November 12th 2002. The most recent time in I'm sure the vehicle was properly repaired with a "fix" being released by Ford months prior to that visit. Hope this helps.

-----Original Message-----

From: Davis, Ruth (R.I.)
Sent: Wednesday, August 27, 2003 8:49 AM
To: Ozbolt, Thomas (T.W.)
Cc: Goodhart II, Dennis (D.P.)
Subject: [REDACTED]

Hi,

I have received an attorney demand for lemon law on this vehicle. If you have any information that would assist me with a decision, please let me know.

Thank you,

| | | | |
|---|------------------------|-------------------------------|-----------------|
| VIN: 1FMYL031B2KC81942 | Year: 2002 | Model: ESCAPE | Case: 561381973 |
| Name: MRS THERESA BLASKO | Owner Status: Original | WBO: 2002-03-12 | |
| Symptom Desc: STALL/QUITS AT CRUISE ALL ENGINE TEMP | | Primary Phone: 216-524-7273 | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: 440-398-4000 | |
| Issue Type: 07 LEGAL | Issue Status: OPEN | | |
| | | | |

| | | | |
|--|---------------------------|---|--|
| Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND | | | |
| Dealer: 03273 LIBERTY FORD SOUTHWEST, INC. | | Origin Desc: CA-LITIGATION PREVENTION-FRONT | |
| DESK | | | |
| Odometer: 16176 MI | Comm Type: MAIL | | |
| Analyst Name: LEICH, CHERIE | Analyst: CLEICH | | |
| Action Date: 08/26/2003 | Action Time: 09:57:34.863 | Action Data: Yes | |
| | | | |

Comments *****ATTORNEY DEMAND***** DATE STAMPED 8-26-03. ATTORNEY ALLEGES CLIENT'S VEHICLE HAS BEEN SERVICED FOR A STALLING CONDITION. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Ruth Davis
Litigation Prevention Analyst
Pittsburgh Region
Phone 313-845-5539
Fax 313-845-5555

6-1-10

2003

1503211633 NEW YORK

ENC2-627.1 6785

CONSUMER AFFAIRS

| DATE | TIME | TO/FROM | MODE | MIN/SEC | PGS | CHG# | STATUS |
|-------|-------|------------|------|---------|-----|------|--------|
| 07/18 | 09:24 | 9732579128 | EC-S | 00'38" | 002 | 237 | OK |



Facsimile Cover Sheet

Fax Number: (973) 257-9128

To: Howard A. Gutman

From: Vincent D. Kirtsey

Location: Ford Motor Company, Consumer Affairs

Address: 16800 Executive Plaza Drive, MD#3NE-B,
Bldg 399, Dearborn, MI 48126-4207

Fax number: (313) 845-5555

Date: 07/10/2003

Number of pages: 2 (including the cover)

Re: Michael Caputo

2002 Ford Escape

VIN# 1FMYU03102KD23267

Additional Comments:

Vincent D. Kirtsey

Ford Motor Company

Consumer Affairs

Sent Via Facsimile

July 10, 2003

Mr. Howard A. Gutman
Attorney At Law
1259 Route 46
Parsippany, NJ 07054

Re: [REDACTED]
2002 Ford Escape
VIN# 1FMYU03102KD23267

Dear Mr. Gutman:

This letter is in response to your letter dated June 30, 2003 regarding the above-mentioned client, but received by our department on July 09, 2003.

Ford Motor Company has reviewed your client's claim. Unfortunately, we are unable to offer any assistance at this time.

Furthermore, information provided by the servicing dealership indicated that your client's vehicle concern was resolved on or about July 07, 2003. The dealership has religiously tried reaching your client, but to no prevail. Please have your client contact the dealership regarding vehicle pick-up.

Thank you for the opportunity to review this concern.

Respectfully yours,


Vincent D. Kirksey
Consumer Affairs





Facsimile Cover Sheet

Fax Number: (973) 257-9128

To: Howard A. Gutman

From: Vincent D. Kirksey

Location: Ford Motor Company, Consumer Affairs

Address: 16800 Executive Plaza Drive, MD#3NE-B,
Suite 339; Dearborn, MI 48126-4207

Fax number: (313) 845-5555

Date: 07/10/2003

Number of pages: 2 (including the cover)

Re: [REDACTED]
2002 Ford Escape
VIN# 1FMYU08102KD23267

Additional Comments:

Vincent D. Kirksey

Kirksey, Vince (V.)

To: Welch III, James (J.R.)
Cc: Kirksey, Vince (V.)
Subject: FW: [REDACTED]

James,

I was wondering if you could provide me some additional information regarding the above vehicle. The customer has contact and attorney who is seeking to file lemon law & revocation of acceptance under the state of New Jersey. Thanks!

Customer: [REDACTED]

MORSII Case Number: 1503211633

Dealer: Popular Ford Sales

Dealer P&A: 03628-Market B1

Vehicle: 2002 Ford Escape

VIN#: 1FMYU08102KD29267

Concern: Engine Stall concern

Vincent Depaul Kirksey

FCSD-Consumer Affairs
Litigation Prevention Analyst-New York Region
2NE-8308 Regent Court Building
Phone: (313) 84-5834
Fax: (313) 84-5885
Proto: VKIRKSE1

LAW OFFICES OF HOWARD A. GUTMAN

1259 ROUTE 48

PARSIPPANY, NEW JERSEY 07054

(973) 257-9400 FAX (973) 257-9128

Vince
Region: 13
Case:
1503211633

June 30, 2003

Ford Motor Company
Consumer Affairs
PO Box 6248
Dearborn, Michigan 48128

3 JUL -8 AM 11:23

CONSUMER AFFAIRS
SECTION

Re: [REDACTED]
2002 Ford Escape
VIN No. 1FMYU03102KD23287

Dear Sir/Madam:


I represent [REDACTED] who purchased a 2002 Ford Escape from Auto Land in New Jersey on August 24, 2002. I believe that his passenger vehicle is a lemon under the New Jersey Lemon Law (N.J.S.A. 56:12-29). I am hereby making a written demand for relief under the Lemon Law.

Since [REDACTED] purchased the vehicle, it has been repeatedly out of service for stalling and engine malfunctions and out of service over twenty calendar days. The problems include but are not limited to engine malfunctions. The defects substantially impair the use, value, and safety of the vehicle.

I am allowing you one final opportunity to repair the vehicle. If these repairs are not completed within ten calendar days of receipt of this letter, my client is entitled to a replacement vehicle acceptable to him or a refund calculated in accordance with the Lemon Law.

Please contact our office to make arrangements. Thank you.

Very truly yours,



Howard A. Gutman

cc:



Customer Info

| | | | | | |
|---------------------------|------------|----------------|------------|------------------|------------|
| Customer: | [REDACTED] | Primary Phone: | [REDACTED] | Secondary Phone: | [REDACTED] |
| Address: | [REDACTED] | BROOKLYN | NY | [REDACTED] | |
| Country: | USA | Language: | EN | | |
| Cell Phone: | | Pager: | | | |
| Preferred Contact method: | | Fax: | | | |
| Preferred Contact Time: | | Email: | | | |

EP02-027.1 0792

| Date | Origin | Description | Action List |
|----------|--------|--------------------------------------|-------------|
| 07/08/03 | CALGFD | OPEN LEGAL CONTACT - ATTORNEY DEMAND | |
| 07/09/03 | CALGL | MAKE OUTBOUND CALL TO ATTORNEY | |

ENC-827.1 6783

| VIN | Year | Model | Vehicle List Sales Type | Owner Status | Vehicle Info Oasis Warranty History |
|-------------------|------|-----------------------------|----------------------------|----------------|---|
| 1FMYU03102KD23267 | 2002 | ESCAPE Open Issues Exdat | INDIVIDUAL RTL | Original Owner | |

EM02-027.1.0704

VEHICLE DETAIL

| | |
|------------------------|--|
| VIN: 1FMYU03102KD23267 | Engine: MOD 3.0L DOHC EFI NA V8 G*NAAO |
| Make: FORD | Transmission: 4 SPD AUTO TRANS NAAO CD4E A |
| Model: ESCAPE | Paint Code/Color: EBONY SOLID G/C |
| Year: 2002 | Calibration: 2M11A30A |
| Pay Load: | Max Towing Weight: |
| GVWR: 04380 | Axis Ratio: |
| WheelBase: 103 | Warranty Start Date: 8/24/2002 |
| GCWR: | Vehicle Build Date: 4/13/2002 |
| PEP Code: 320A | |

Selling Dealers Name: AUTOLAND OF NEW JERSEY, INC.

Selling Dealers P & A Code: 03705

Selling Dealers Sales Code: F13051

Selling Dealers Main Phone: 973-467-2900 Selling Dealers Service Phone: 973-467-6244

Vehicle Order Image

```

1 2 3 4 5 6 7 8 9 10 1 2 3 4 5 6 7 8 9 20 1 2 3 4 5 6 7 8 9 30 1 2 3 4 5 6 7 8 9 40 1 2 3 4 5 6 7 8 9 50
U 0 3 2 K D 2 3 2 6 7 1 0 3 3 7 6 C 2 2 1 C A 1 2 6 I C G 2 M 4 9 8 8 3
1 2 3 4 5 6 7 8 9 60 1 2 3 4 5 6 7 8 9 70 1 2 3 4 5 6 7 8 9 80 1 2 3 4 5 6 7 8 9 90 1 2 3 4 5 6 7 8 9 100
N 3 2 X 5 5 4 S 3 A B N 1 3 K 0 5 1 L 1 U A N 2 3 4 9 2 1 1
1 2 3 4 5 6 7 8 9 110 1 2 3 4 5 6 7 8 9 120 1 2 3 4 5 6 7 8 9 130 1 2 3 4 5 6 7 8 9 140 1 2 3 4 5 6 7 8 9 150
F M Y O M 2 3 2 0 A 9 1 4 N J
1 2 3 4 5 6 7 8 9 160
    
```

EN02-027.1 0795

Update This Information in Stars

Dealer Detail

| FCSD Region | Sales Region | Sales Zone | Market | P&A Code | Sales Code |
|-------------|--------------|------------|--------|----------|------------|
| 13-NEW YORK | 13-NEW YORK | A | B1 | 03829 | F13021 |

Dealer Name: POPULAR FORD SALES
INC

Dealer Address: 2505 CONEY ISLAND
BROOKLYN NY 11223

Dealer Main Phone: 718-376-3600

Dealer Service Phone: 718-376-9111

| Position | Employee Name |
|--------------------|----------------------|
| CUST RELATIONS MGR | BARBARA MAHMOUD |
| DEALER/PARTNER | JAME RISSO |
| DEALER/PARTNER | STEVEN M RISSO |
| PARTS MANAGER | STUART R YAMMER |
| SALES MANAGER | MOHAMED M ELTALKHAWI |
| SALES MANAGER | ANDREW J ROCCO |
| SALES MANAGER | ASHER BUTBUL |
| SERVICE MANAGER | robert / karadzias |

E982-027.1 8785

Vehicle Information

VIN: 1FMYU03102KD23267

No ESP information for this VIN

No Recall information for this VIN

EM2-027.1 0707

2002 FORD F150

13-04-02

| VIN | AWS VL | WERS VL | MKT DEK | BODY CAB | VEE SERIES | DRIVE TYPE | PLANT CD | TRANS CD | ENG COD | PROD DATE | WARR DATE | SELLING DEALER | SELL CNT | TIS | QRT | WCC | PREF | BASE | SUPP | VRT | VFG | CCC | CD |
|-----------------------|---|---------|--------------------------|-----------|------------|------------|----------|-------------|---------|----------------|-----------|----------------|-------------|-------------|------|------|------|--------|------|-----|-----|-----|----|
| | M1 | T/M1 | T/F | T/WE | T/EF | T/A | AJ | T/DJ | T/LD | 13-04-02 | 24-08-02 | 113051 | USA | 10 | * | 2B03 | 1L8Z | 9F715 | AA | S11 | V42 | D21 | 42 |
| AWS Claim Key: | 6068452 | Dec #: | 09598151 | Trx Code: | S07 | Labor Hrs: | 9 | Labor Cost: | 83.7 | Material Cost: | 44.55 | Total Cost: | 128.25 | | | | | | | | | | |
| Dir Cd-Sub Cd: | 04108-* | Name: | POPULAR FORD SALES, INC. | Ph: | ** | St: | NY | City Cd: | USA | Reg Cd: | NA | Repr Date: | 04-JUN-2003 | DIST(Mile): | 4506 | | | | | | | | |
| Cost Comments: | CUST ST VEHICLE STALLED RPM'S DROP WHEN TAKING IT FROM DRIVE TO REVERSE | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | INOP EEC (QUICK TEST) DIAGNOSIS | | | | | | | | | | | | | | | | | | | | | | |
| | M1 | T/M1 | T/F | T/WE | T/EF | T/A | AJ | T/DJ | T/LD | 13-04-02 | 24-08-02 | 113051 | USA | 10 | * | 2002 | 1L2Z | 12B579 | BARM | S11 | V42 | D21 | 42 |
| AWS Claim Key: | 6105464 | Dec #: | 09606851 | Trx Code: | S07 | Labor Hrs: | 2.3 | Labor Cost: | 213.9 | Material Cost: | 320.73 | Total Cost: | 534.63 | | | | | | | | | | |
| Dir Cd-Sub Cd: | 04108-* | Name: | POPULAR FORD SALES, INC. | Ph: | ** | St: | NY | City Cd: | USA | Reg Cd: | NA | Repr Date: | 09-JUN-2003 | DIST(Mile): | 4579 | | | | | | | | |
| Cost Comments: | CUST ST VEHICLE IS STILL STALLING | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | INOP EEC (QUICK TEST) DIAGNOSIS | | | | | | | | | | | | | | | | | | | | | | |
| | M1 | T/M1 | T/F | T/WE | T/EF | T/A | AJ | T/DJ | T/LD | 13-04-02 | 24-08-02 | 113051 | USA | 10 | * | 2002 | 1L2Z | 12B579 | BARM | S11 | V42 | D21 | 42 |
| AWS Claim Key: | 6105465 | Dec #: | 09606852 | Trx Code: | S07 | Labor Hrs: | .1 | Labor Cost: | 9.3 | Material Cost: | 0 | Total Cost: | 9.3 | | | | | | | | | | |
| Dir Cd-Sub Cd: | 04108-* | Name: | POPULAR FORD SALES, INC. | Ph: | ** | St: | NY | City Cd: | USA | Reg Cd: | NA | Repr Date: | 09-JUN-2003 | DIST(Mile): | 4579 | | | | | | | | |
| Cost Comments: | CUST ST VEHICLE IS STILL STALLING | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | INOP EXTRA TIME TO REPEAT FINAL QUICK TEST | | | | | | | | | | | | | | | | | | | | | | |

Any comments? You can contact



webmaster

ER02-027.1 0708

VEHICLE INFORMATION REPORT

GENERAL VEHICLE INFORMATION:

(Related Claims)

| | | | | | |
|----------------------|---|-----------------|--------------------------------|----------------------|---------------------------------------|
| VIN: | 1FMYU0G102KD23267 | Vehicle Line: | T/M1 - ESCAPE (U204) (2001) | Body Shell: | * |
| Model Year: | 2002 | Market Derivat: | T/F - FORD DIVISION DERIVATIVE | Navis Eng Serial No: | 372247086 |
| Vehicle Type: | T | Drive Code: | T/A - 2 WHL L/H FRONT DREVE | Engine: | T/LD - MOD 3.0L DOHC EFI NA Y6 G*NAAO |
| Inv. Dealer: | 03705 | Body Cab Style: | - 5 DOOR LIGHT TRUCK | Transmission: | T/DJ - 4 SPD AUTO TRANS NAAC CDME |
| Vehicle System Code: | 800 | Version/Series: | TEF - FORD SERIES | | |
| Trace Eng Serial No: | -----1-----2-----3-----4-----5-----6-----7-----8----- | | | | |

372247086

Trace Trans Serial No:

218 P2B7120951325

BUILD INFORMATION:

| | | | |
|----------|-----------------|------------|------------------------------|
| Region: | NA - #00000000 | Plant: | AJ - KANSAS CITY PLANT BUILD |
| Country: | USA - #00000000 | Prod Date: | 13-APR-2002 |

SALE INFORMATION:

| | | | |
|----------------------|-----------------|-------------------------|--------------------------|
| Region: | NA - #00000000 | Selling Dealer: | 113051 - * |
| Country: | USA - #00000000 | Selling Div St/Prov: | NJ |
| | | Buyer St/Prov: | NY |
| Arrival Date: | 24-APR-2002 | Red Carpet Lease: | * |
| Sale Date: | 24-AUG-2002 | Fleet/Retail/Ch. Lease: | R |
| Warranty Start Date: | 24-AUG-2002 | Modified Vehicle: | * Vehicle Count Flag: |
| Orig Warranty Date: | 24-AUG-2002 | Reacquired Vehicle: | * Vehicle Export Flag: N |

EQ02-027.1 0700

VOC/EOC:

-----1-----2-----3-----4-----5-----6-----7-----8-----9-----0

0032H02326710237 6 C 2 21CA126 IC G 2M96 63 H 3 2X5 5 493A98 13K051L 1 UA M23 4 3 2 11

EXR0M2 320A 914M7 63

INSTALLED OPTION INFORMATION:

| | | | |
|------------------------|------------------------------------|-----------------------|-------------------------------------|
| Air Conditioning: | T/B - MANUAL AIR CONDITIONER | GVW Code: | |
| Alternator Amp Rating: | C | GVW Class Code: | Y |
| Audio Disk: | * - [N/A] | Instrumentation: | * - [N/A] |
| Axle Ratio: | * - [N/A] | Mirror(Driver Side): | B8 - DRV MANUAL FOLD, POWER ADJUST |
| Axle Type: | * - [N/A] | Mirror(Passr Side): | B8 - PASS MANUAL FOLD, POWER ADJUST |
| Battery Amp Rating: | A | Paint: | PN3AA - EBONY SOLID C/C |
| Brake Code: | FEAAB - 4 WHEEL ANTI-LOCK BRAKES | Power Antenna: | AB - FIXED RADIO ANTENNA-BRIGHT |
| Brake Code(Service): | * - [N/A] | Radio: | FA - CDX6 RADIO WITH 6 DISC CHANGER |
| Calibration Code: | 2M11A30A | Sound System: | AA - LESS UPGRADED SOUND SYSTEM |
| Color(Account): | * - [N/A] | Steering Tendon Axle: | |
| Color(Trip): | 0002X - | Tire Manufacturer: | AP - CONTINENTAL |
| Delivery Type: | 0 | Tire Brand: | 08_453 - CONTINENTAL SLV 104T |
| Drivetrain Code: | D | Tire Size: | D311J - P235/70R-16 OWL A-8 |
| Front Seat: | T/B - SEAT-INDIVIDUAL-L/B DRV/PASS | Traction Control: | * - [N/A] |
| Fuel Type: | AP - UNLEADED FUEL CAPABILITY | Wheel Base: | |

TIRE DOT INFORMATION:

LF: A308_4531102 RP: A308_4531102
 LR: A308_4531102 RR: A308_4531102
 LE: * RI: *

SPARE: HY6A1R8130? DOT Plant Manufacturer: A3 - GENERAL TIRE & RUBBER CO ; MOUNT VERNON ; ILLINOIS ; UNITED STATES

ESP INFORMATION: EMISSIONS INFORMATION:

| | | |
|----------------------|------------------------|-------------|
| ESP Code: | * Emission Code: | * - * |
| ESP Coverage(Miles): | * Emission Cert Type: | 5 |
| ESP Coverage(Time): | * Emission Decal Size: | 11Z |
| ESP Plan Year: | * Engine Family: | 2FMXT0301F7 |
| ESP Signature Date: | | |

Any comments? You can contact

FORM 027-1 0800

30/07/2003 10:00:00 AM

Print

VIN: 1FMYU03102KD23287

Year: 2002

Model: ESCAPE

Case: 1503211633

Name: [REDACTED]

Owner Status: Original

WSD: 2002-08-24

Symptom Desc: STALL/QUITS AT IDLE ALL ENGINE TEMP

Primary Phone: [REDACTED]

Reason Desc: LEGAL - ACCIDENT

Secondary Phone: [REDACTED]

Issue Type: 07 LEGAL

Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND

Dealer: 03629 POPULAR FORD SALES INC

Origin Desc: CA-LITIGATION PREVENTION-FRONT DESK

Odometer: 4579 MI

Comm Type: EMAIL

Analyst Name: DROEGE,AMY

Analyst: ADROEGE

Action Date: 07/08/2003

Action Time: 13.49.12.785

Action Date: Yes

Comments *****ATTORNEY DEMAND***** ATTORNEY DEMAND LETTER DATE STAMPED 07-08-2003. ATTORNEY STATES HIS CLIENT'S VEHICLE HAS BEEN SERVICED FOR STALLING AND ENGINE FAILURES. ATTORNEY DEMANDS CONTACT FROM A FORD REPRESENTATIVE.

| Data Element Name | Data Value |
|-----------------------|--------------------------------|
| NAME OF LAW FIRM | LAW OFFICE OF HOWARD A. GUTMAN |
| ATTORNEY NAME | HOWARD GUTMAN |
| ATTORNEY PHONE NUMBER | 9732579400 |

Action: MAKE OUTBOUND CALL TO ATTORNEY

Dealer: 03629 POPULAR FORD SALES INC

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 4579 MI

Comm Type: PHONE

Analyst Name: KIRKSEY, VINCE (V.)

Analyst: VKIRKSE1

Action Date: 07/08/2003

Action Time: 14.45.33.287

Action Date: Yes

Comments ***LPA COMMENTS*** LPA ACKNOWLEDGES RECEIPT OF ATTORNEY DEMAND LETTER SENT ON BEHALF OF THE CUSTOMER.

| Data Element Name | Data Value |
|-------------------|---------------|
| CONTACT PERSON | HOWARD GUTMAN |

Action: INFORMATIONAL CALL/FAX WITH OTHER PARTY

Dealer: 03629 POPULAR FORD SALES INC

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Odometer: 4579 MI

Comm Type: EMAIL

Analyst Name: KIRKSEY, VINCE (V.)

Analyst: VKIRKSE1

Action Date: 07/10/2003

Action Time: 08.19.67.589

Action Date: No

EMR2-827.1 0801

Comments ***LPA COMMENTS*** LPA HAS SENT AN E-MAIL TO THE CSM REQUESTING ADDITIONAL INFORMATION REGARDING THE CUSTOMER'S CONCERN.

Action: DENY ASSISTANCE - NO FORD PRODUCT DEFECT FOUND

Dealer: 03629 POPULAR FORD SALES INC

Odometer: 4579 MI

Analyst Name: KIRKSEY, VINCE (V.)

Action Date: 07/10/2003

Comm Type: FAX

Analyst: VKIRKSE1

Action Time: 09.21.12.057

Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION

Action Data: No

Comments ***LPA COMMENTS*** LPA HAS REVIEWED THE ABOVE CASE. UNFORTUNATELY, WE WILL BE UNABLE TO PROVIDE ASSISTANCE IN THE MATTER, AND PROPOSE NO FURTHER ACTION.

EP012-0271.1 0002

12.7 ISSUE_UPDATE_ID_C=VKIRKSE1&USER_ID_C=VKIRKSE1&STATUS_STATUS_C=C%20&ISSUE_ODOMTRD 1/03

2003

1414671813 SDR-PHILADEL

EM62-027.1 0083

Ford Motor Company

Consumer Affairs

SENT VIA FACSIMILE

July 25, 2003

Mr. Robert M. Silverman
Kimmel & Silverman
30 East Butler Pike
Ambler, PA 19002

RE: [REDACTED]
2001 Ford Escape
VIN: 1FMCU04181KA78936

Dear Mr. Silverman:

This letter is in response to your letter dated June 17, 2003 regarding the above-mentioned vehicle. Ford Motor Company has reviewed your claim. Unfortunately, we are unable to offer any assistance at this time.

Thank you for the opportunity to review this concern.

Respectfully yours,

Catherina Papalia-Reid

Catherina Papalia-Reid
Consumer Affairs



KIMMEL & SILVERMAN
P.C.

ROBERT M. SILVERMAN *
CRAG THOR KIMMEL **

* ALSO MEMBER OF NEW YORK AND NEW JERSEY BARS
** ALSO MEMBER OF NEW YORK BAR
* ALSO MEMBER OF NEW JERSEY BAR

30 EAST BUTLER FIVE
AMBLER, PA 19002

1-800-LIMON LAW
P (215) 340-8888
F (215) 340-8817

www.limonlaw.com

Catherina
Region: 16
Case:
1414671813

VIVIAN BRUCE PHILAN
AMY D. COX
LOUIS DOBL JR.
SHANNON M. RYAN
DANA TARQUINI
MAYLEE M. MERRINS
LINDSAY D. HOFFMAN

June 17, 2003

VIA TELEFAX ONLY
(313) 845-5555

Mr. Vince Kirksey
Ford Consumer Affairs
16800 Executive Plaza Drive 3NE-301
Dearborn, Michigan 48126

RE: [REDACTED] v. Ford Motor Company
2001 Ford Escape
VIN: 1FMCU04181KA78936
Zip Code: 19711
Selling Dealer: Union Park Ford

Dear Mr. Kirksey:

Please take notice that I represent the captioned individual in her claim against Ford. Please take the steps necessary to advise all Ford Personnel and dealership personnel that I am Ms. Maynard's counsel and there should be no contact with my client, except for contact necessary to implement current repair attempts. I am writing this letter as an effort to work out a pre-litigation settlement and any attempts to contact my client directly will result in the immediate filing of suit and a request for an injunction and sanctions.

As you will notice from your Warranty History as well as any dealership records you review, my client's vehicle is a presumptive lemon. Specifically, the vehicle has been serviced by Union Park Ford for chronic engine failure and stalling conditions.

Vince Kirksey
June 17, 2003
Page -2-

Plaintiff hereby demands the statutory repurchase of the vehicle, plus payment of counsel fees and costs in the bottom line amount of \$1,500.00. I would also be willing to discuss a vehicle swap, but only if the terms are favorable to my client, who is a loyal Ford Customer.

Please be advised that suit will be filed if we have not reached a settlement on or before 7/7/03. In the meantime, please call or write me if you need any additional information or documentation.

Very truly yours,



Robert M. Silverman

RMS:vms



STATE OF DELAWARE
Motor Vehicle Registration Card

Good Only When Signed On Back And Officially Validated

VEHICLE MUST BE INSPECTED AND REGISTRATION RECEIVED WITHIN 90 DAYS BEFORE EXPIRATION
A FEE OF \$200 PER YEAR IS REQUIRED FOR EACH SUBSEQUENT RENEWAL

| | | | |
|----------------|-------------------|-------|-----|
| [REDACTED] | | | |
| ACTUAL VEHICLE | | | |
| PC10185 | FORD 2001 | SPE | 4W |
| 08/27/2002 | 1FKCUG4101KA78936 | | |
| 03/31/2004 | 20.00 | 4,526 | NEW |

CURRENT VALIDATION

IDENTIFY-PC10185
IDENTIFY-PC10185
IDENTIFY-PC10185
IDENTIFY-PC10185
EXPIRATION DATE: 03/31/2004
WEED : 03/27/03 PC 02



802

NEWARK

DE





STATE OF DELAWARE

Motor Vehicle Registration Card

Good Only When Signed On Back And Officially Validated

VEHICLES MUST BE INSURED AND REGISTRATION TAXES MUST BE PAID BEFORE EXPIRATION
A STRONG SALES TAG IS REQUIRED FOR LATE REGISTRATION SERVICES

| | | | |
|----------------|-------------------|-------|-----|
| [REDACTED] | | | |
| ACTUAL VEHICLE | | | |
| PC10196 | FORD 3001 | SFE | 4W |
| 09/27/2002 | 1FMCU041B1XA78926 | | |
| 03/31/2004 | 20.00 | 4,536 | NEW |

CURRENT VALIDATION

1451827041B1XA78926
1451827041B1XA78926
1451827041B1XA78926
EXPIRATION DATE 03/31/2004
VALID : 03/27/2003

[REDACTED]

40R

NEWARK

DE [REDACTED]

Ford Motor Company

Consumer Affairs

Sent Via Fax

June 27, 2003

Kimmel & Silverman
30 East Butler Pike
Ambler PA 19002

RE: [REDACTED]
2001 Ford Escape
VIN: 1FMCU04181KA78936

This VIN number is correct. Please check your records again. Thanks

RE: Susan Maynard
2001 Ford Escape
VIN: 1FMCU04181KA78936
Zip Code: 19711
Selling Dealer: Union Park Ford

| | |
|---------------|---------|
| Date Checked: | 6/30/03 |
|---------------|---------|

Dear Robert Silverman:

Our records indicate this vehicle belongs to another individual. Please provide us with a valid VIN and the customer's full home address to enable us to follow up on your contact with Ford Motor Company. If your client is a subsequent owner of this vehicle, please forward a copy of the registration, title or purchase agreement. In order to conduct a complete review, please contact me at (313) 845-5876 as soon as possible between the hours of 9:00 a.m. and 4:30 p.m. Eastern Time or fax the information to my attention at 313-845-5669.

If we do not hear from you within 10 business days of the date of this letter, we will assume that you no longer wish to pursue this matter and our file will be closed.

Respectfully yours,

Cherie Leich

Cherie Leich
Consumer Affairs

Ford Motor Company

Consumer Affairs

Sent Via Fax

June 27, 2003

Kimmel & Silverman
30 East Butler Pike
Ambler PA 19002

This VIN number is correct. Please check your records again. Thanks

RE: Susan Maynard
2001 Ford Escape
VIN: 1FMCU04181KA78936
Zip Code: 19711
Selling Dealer: Union Park Ford

| | |
|---------------|---------|
| Date Checked: | 6/30/03 |
|---------------|---------|

RE: [REDACTED]
2001 Ford Escape
VIN: 1FMCUD4181KA78936

Dear Robert Silverman:

Our records indicate this vehicle belongs to another individual. Please provide us with a valid VIN and the customer's full home address to enable us to follow up on your contact with Ford Motor Company. If your client is a subsequent owner of this vehicle, please forward a copy of the registration, title or purchase agreement. In order to conduct a complete review, please contact me at (313) 845-5676 as soon as possible between the hours of 8:00 a.m. and 4:30 p.m. Eastern Time or fax the information to my attention at 313-845-5669.

If we do not hear from you within 10 business days of the date of this letter, we will assume that you no longer wish to pursue this matter and our file will be closed.

Respectfully yours,

Cherie Leich

Cherie Leich
Consumer Affairs

Ford Motor Company

Consumer Affairs

Sent Via Fax

June 27, 2003

Kimmel & Silverman
30 East Butler Pike
Ambler PA 19002

RE: [REDACTED]
2001 Ford Escape
VIN: 1FMCU04181KA78936

Dear Robert Silverman:

Our records indicate this vehicle belongs to another individual. Please provide us with a valid VIN and the customer's full *home address* to enable us to follow up on your contact with Ford Motor Company. If your client is a subsequent owner of this vehicle, please forward a copy of the registration, title or purchase agreement. In order to conduct a complete review, please contact me at (313) 845-5676 as soon as possible between the hours of 8:00 a.m. and 4:30 p.m. Eastern Time or fax the information to my attention at 313-845-5669.

If we do not hear from you within 10 business days of the date of this letter, we will assume that you no longer wish to pursue this matter and our file will be closed.

Respectfully yours,

Cherie Leich

Cherie Leich
Consumer Affairs



Customer Info

| | | | | | |
|---------------------------|------------|----------------|------------|------------------|------------|
| Customer: | [REDACTED] | Primary Phone: | [REDACTED] | Secondary Phone: | [REDACTED] |
| Address: | [REDACTED] | NEWARK | | DE | [REDACTED] |
| Country: | USA | Language: | EN | | |
| Cell Phone: | | Pager: | | | |
| Preferred Contact method: | | Fax: | | | |
| Preferred Contact Time: | | Email: | | | |

ENR2-027.1 0012

VIN
1FMCJD4181KA78936

Year Model
2001 ESCAPE
Open Issues Exist

Vehicle List
Sales Type
INDIVIDUAL RTL

Owner Status
Original Owner

Vehicle Info
Costs
Warranty History

EMR-027.1 0613

ESP / Recall Information

VIN: 1FMCU04181KA78936

No ESP Information for this VIN

Recall Information

| Number | Type | Description | Campaign | Status | Date | Dealer Code |
|--------|------|--------------|----------|----------------------|------------|-------------|
| 02M01 | O | EGR PRES SEN | | RELEASED FOR MAILING | 2003-01-11 | F16218 |

ERR2-027.1 0814

**OASIS RESULT:
1FMCU04181KA78936**07/02/2003
11:02:57

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VEHICLE INFORMATION

| | | | |
|--|---------------------------------------|--------------------------------|---------------------------------------|
| VEHICLE DESCRIPTION 2001 ESCAPE | BODY STYLE 4 DR XLT MPV 4X4 | ENGINE 3.0L EFI DOHC | ENGINE CALIBRATION 0M11A30A |
| TRANSMISSION CD4E AUTO TRANSAXLE | AXLE CODE 69 | | |

GENERAL WARRANTY INFORMATION

| | | |
|--|---------------------------------|------------------------------|
| WARRANTY START DATE 03/08/2001 | BUILD DATE 02/26/2001 | SALE MILEAGE 00004 |
|--|---------------------------------|------------------------------|

WARNING MESSAGES**LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE*****THIS VEHICLE HAS AN OPEN CUDL LEGAL CONTACT****FIELD SERVICE ACTIONS**

**02M01 CAUTION: MAY NOT NEED REPAIR; SERVICE ONLY IF CONCERN IS PRESENT.
PLEASE REFER TO DEALER LETTER FOR PROGRAM COVERAGE
TUBE-MOUNTED EGR PRESSURE SENSOR - ADDITIONAL COVERAGE OF 2 YEARS OR 24,000
MILES, WHICH EVER OCCURS FIRST, TO THE BASE WARRANTY.**

EXTENDED COVERAGES

NO ESP INFORMATION AVAILABLE

REPAIR HISTORY

06/05/2003 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 430689

ODOMETER: 025968M

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DISC |
|--------------|---------------------|----------|------------|----------------|----------------------|
| YLBZ 1B51BAA | KNOB CONTROL-HEATER | 001 | MYLBZ1B51B | 42 | DOES NOT OPERATE PRO |

VERIFIED CONCERN THAT STEM OF TEMP CONTROL KNOB IS BROKEN REMOVE D STEEL SLEEVE FROM POST AND INSTALLED NEW TEMP CONTROL KNOB

03/18/2003 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 419844

ODOMETER: 024053M

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DISC |
|--------------|----------------------|----------|----------|----------------|----------------------|
| TLBZ 8A080BB | COOLANT O/FLO BOTTLE | 001 | 10854C | 42 | DOES NOT OPERATE PRO |
| | | 000 | 8065D | | |
| | | 000 | 8080A | | |

ROAD TESTED VEH DID HAVE LOW COOLANT LIGHT COME ON FILLED TANK TO FULL LINE AND TESTED SMALL LEAK AT SEAM REPLACED COOLANT TANK

03/18/2003 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 419844

ODOMETER: 024053M

EAS2-027.1 0815

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DESC |
|-------------|------------------|----------|----------|----------------|----------------------|
| DIAG | DIAGNOSIS | 000 | 128800 | 42 | DOES NOT OPERATE PRO |

CHECKED FOR CONCERN NO STALLING OCCURED TEST DROVE VEH 80 MILES VEH DIDNOT ST ALL OR SHOW SYMPTOME OF STALLING

03/06/2003 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 418252 ODOMETER: 023500M

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DESC |
|--------------|------------------|----------|----------|----------------|----------------------|
| YL2Z 18801DA | MOTOR A/C BLOWER | 001 | 18805A | 42 | DOES NOT OPERATE PRO |

VERIFIED CONCERN TRACED TO BLWOER MOTRO INTERNAL BEARING CONCERN REPLACED B LOWER MOTRO

01/24/2003 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 413605 ODOMETER: 022326M

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DESC |
|--------------|----------------------|----------|----------|----------------|----------------------|
| YF1Z 9E338AA | GSKT AIR CHARGE CNTL | 001 | 9228A | 50 | FROZEN/SEIZED/BINDIN |
| 2L2Z 9E228AB | BODY ASY-AIR CHARGE | 001 | 128800 | | |
| | | 000 | 12880080 | | |

PERFORMED NGS TEST NO CODES PERFORMED PID DATA TES TRACED CONCERN TO THROTTLE BODY STICKING REMOVED AND REPLACED

11/18/2002 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 404930 ODOMETER: 020286M

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DESC |
|---------------|--------------------|----------|----------|----------------|----------------------|
| 2L2Z 7B23208A | REGULATOR FR DR WD | 001 | 2343A1 | 42 | DOES NOT OPERATE PRO |
| | | 000 | 2343A10 | | |

VERIFIED CUST CONCERN WITH PB FRONT WINDOW REPLACED WINDOW REG ASSY WITH MOT OR

05/14/2002 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 392358 ODOMETER: 017874M

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DESC |
|-----------------|------------------|----------|-------------|----------------|----------------------|
| YL3Z 7B45140AAB | COVER LUGGAGE | 001 | MYYL2Z7845A | 42 | DOES NOT OPERATE PRO |

VERIFIED CONCERN REPLACED CARGO COVER

06/06/2002 DEALER: Union Park Ford, Inc.

WARRANTY CLAIM NUMBER: 390973 ODOMETER: 017700M

| PART NUMBER | PART DESCRIPTION | QUANTITY | LABOR OP | CONDITION CODE | CONDITION DESC |
|-------------|------------------|----------|----------|----------------|----------------------|
| 10854 | KIT BATTERY | 000 | 10854C | 42 | DOES NOT OPERATE PRO |
| | | 000 | 80080 | | |

TESTED BATTERY OK COOLANT LIGHT WAS ON CHECKED FOR LEAKS AND TOPPED OFF FLUID

END OF OASIS REPORT FOR 1FMCU04181KA78936

Dealer Information

| FCSD Region | Sales Region | Sales Zone | Market | P&A Code | Sales Code |
|-------------|-----------------|------------|--------|----------|------------|
| 10-SDR | 18-PHILADELPHIA | D | A4 | 00771 | F16212 |

| | | | |
|--------------------|---|-----------------------|--------------|
| Dealer Name: | UNION PARK FORD, INC. | | |
| Dealer Address: | 1704 PENNSYLVANIA AVENUE WILMINGTON DE 19806 | | |
| Dealer Main Phone: | 302-658-7246 | Dealer Service Phone: | 302-573-4867 |

| Position | Employee Name |
|--------------------------|-------------------|
| CUST RELATIONS MGR | Maqui Sauro |
| GENERAL MANAGER | CHESTER ROBERTS |
| PARTS MANAGER | CLEMAL FAULKNER |
| PARTS & SERVICE DIRECTOR | GERALD K HUSBANDS |
| SALES MANAGER | DOUGLAS A SLATER |

Service Hours 7AM - 5PM FAX# 302 573-6280

Directions

Trained Y

Additional Information LSG ENROLLED TOWING: 302-762-4250 FOX POINT TOWING

ERR2-027.1 0617

Vehicle Information Report

GENERAL VEHICLE INFORMATION:

(Related Claims)

| | | | | | |
|----------------------|---|-----------------|---------------------------------|----------------------|--------------------------|
| VIN: | 1FMCU04181KA78936 | Vehicle Line: | T/M1 - ESCAPE (U204) (2001) | Body Shell: | * |
| Model Year: | 2001 | Market Derived: | T/F - FORD DIVISION DERIVATIVE | North Eng Serial No: | 84483087 |
| Vehicle Type: | T | Drive Code: | T/F - 4 WHL L/R FULL TIME DRIVE | Engine: | T/LD - MOD J.0L DOHC EFI |
| Inv. Dealer: | 00771 | Body Cab Style: | - 3 DOOR LIGHT TRUCK | Transmissions: | T/DI - 4 SPD AUTO TRANS |
| Vehicle Status Code: | 800 | Version/Series: | T/EF - FORD SERIES | | |
| Trans Eng Serial No: | -----1-----2-----3-----4-----5-----6-----7-----8----- | | | | |

NA

Trans Trans Serial No:

NA

BUILD INFORMATION:

| | | | |
|----------|-------------|------------|------------------------------|
| Region: | NA - ##### | Plant: | AJ - KANSAS CITY PLANT BUILD |
| Country: | USA - ##### | Prod Date: | 26-FEB-2001 |

SALE INFORMATION:

| | | | |
|----------------------|-------------|-------------------------|--------------------------|
| Region: | NA - ##### | Selling Dealer: | 116212 - * |
| Country: | USA - ##### | Selling Div/Prov: | DE |
| | | Buyer Div/Prov: | DE |
| Arrival Date: | 07-MAR-2001 | Red Carpet Lease: | * |
| Sale Date: | 08-MAR-2001 | Fleet/Rental/Co. Lease: | R |
| Warranty Start Date: | 08-MAR-2001 | Modified Vehicle: | * Vehicle Const Flag: |
| Orig Warranty Date: | 08-MAR-2001 | Reacquired Vehicle: | * Vehicle Export Flag: N |

VOC/EOC:

-----1-----2-----3-----4-----5-----6-----7-----8-----9-----0-----

0041NA78936103 7P V L 0188100 TA X M469 83 M63 265 5 483A2M 160212 0 BQ A M63 4 3 2 11

ENC 5 140E F 58

INSTALLED OPTION INFORMATION:

| | | | |
|------------------------|------------------------------|----------------------|---------------------------------|
| Air Conditioning: | T/B - MANUAL AIR CONDITIONER | GVW Code: | |
| Alternator Amp Rating: | C | GVW Class Code: | C |
| Audio Disc: | * - [N/A] | Instrumentation: | * - [N/A] |
| Axis Ratio: | * - [N/A] | Mirror(Driver Side): | AD - DRIVER POWER MIRROR |
| Axis Type: | * - [N/A] | Mirror(Passr Side): | AD - PASS POWER CONVEX MIRROR |
| Battery Amp Rating: | A | Paint: | PNB10 - LT. PARCHMENT GOLD C/C |
| Brake Code: | * - [N/A] | Power Antennae: | * - [N/A] |
| Brake Code(Service): | * - [N/A] | Radios: | AQ - ELETR PREMIUM AM/FM STEREO |

| | | | |
|-------------------|-----------|--------------------|-----------------------------|
| Calibration Code: | DM11A10A | Sound System: | * - [N/A] |
| Color(Accent): | * - [N/A] | Susp Tandem Axle: | |
| Color(Trim): | * - [N/A] | Tire Manufacturer: | AB - |
| Delivery Type: | 0 | Tire Brand: | SAWM - |
| Driveshaft Code: | D | Tire Size: | D3JLJ - P215/70R-16 OWL A-S |
| Front Seat: | * - [N/A] | Traction Control: | * - [N/A] |
| Fuel Type: | * - [N/A] | Wheel Base: | |

TIRE DOT INFORMATION:

| | | | |
|-----|-------------|-----|-------------|
| LF: | W2 8AWM0701 | RF: | W2 8AWM0701 |
| LR: | W2 8AWM0701 | RR: | W2 8AWM0701 |
| LI: | * | RI: | * |

SPARE: HYBA1R3206 DOT Plant Manufacturer: W2 - BRIDGESTONE/FIRESTONE INC ; WILSON ; NORTH CAROLINA ; UNITED STATES

ESP INFORMATION: EMISSIONS INFORMATION:

| | | |
|----------------------|-------------------------|-------------|
| ESP Code: | * Emission Code: | T7B - T7B |
| ESP Coverage(Miles): | * Emission Cert Type: | 5 |
| ESP Coverage(Thrs): | * Emission Dept Suffix: | HKS |
| ESP Plan Year: | * Engine Family: | 1FMXU0301P6 |
| ESP Signature Date: | | |

Any comments? You can contact



webmaster

All Action Details for Issue

Print

VIN: 1FMCU04181KA78938 Year: 2001 Model: ESCAPE Case: 1414671813
 Name: [REDACTED] Owner Status: Original WSD: 2001-03-08
 Symptom Desc: ENGINE GENERAL CONCERN MECH FAILURE Primary Phone: [REDACTED]
 Reason Desc: LEGAL - OTHER ATTORNEY DEMAND Secondary Phone:
 Issue Type: 07 LEGAL Issue Status: CLOSED

Action: OPEN LEGAL CONTACT - ATTORNEY DEMAND Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Dealer: 00771 UNION PARK FORD, INC.
 Odometer: 25968 MI Comm Type: FAX
 Analyst Name: DROEGE,AMY Analyst: ADROEGE
 Action Date: 06/30/2003 Action Time: 11.31.07.557 Action Date: Yes

Comments ***** ATTORNEY DEMAND ***** ATTORNEY DEMAND FAX RECEIVED 06-30-2003. ATTORNEY STATES HIS CLIENT'S VEHICLE HAS BEEN SERVICED FOR CHRONIC ENGINE FAILURE AND STALLING. ATTORNEY DEMANDS CONTACT FROM A FORD REPRESENTATIVE.

| Data Element Name | Data Value |
|-----------------------|------------------|
| NAME OF LAW FIRM | ROBERT SILVERMAN |
| ATTORNEY NAME | ROBERT SILVERMAN |
| ATTORNEY PHONE NUMBER | 2155408888 |

Action: MAKE OUTBOUND CALL TO ATTORNEY Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Dealer: 00771 UNION PARK FORD, INC.
 Odometer: 25968 MI Comm Type: OTHER
 Analyst Name: CATHERINA PAPALIA (CPAPALIA) Analyst: CPAPALIA
 Action Date: 07/02/2003 Action Time: 11.01.40.341 Action Date: Yes

Comments KIMMEL & SILVERMAN

| Data Element Name | Data Value |
|-------------------|------------|
| CONTACT PERSON | NONE |

Action: FINAL CASE DISPOSITION Origin Desc: CONSUMER AFFAIRS - LITIGATION PREVENTION
 Dealer: 00771 UNION PARK FORD, INC.
 Odometer: 25968 MI Comm Type: OTHER
 Analyst Name: CATHERINA PAPALIA (CPAPALIA) Analyst: CPAPALIA
 Action Date: 07/16/2003 Action Time: 09.38.07.399 Action Date: No

ENR2-827.1 8828

Comments: LPA REVIEWED CASE AND DUE TO THE PREVIOUS REPAIR HISTORY FORD HAS DENIED CUSTOMER'S REQUEST TO HAVE THE VEHICLE BOUGHT BACK. LPA SENT DENIAL LETTER TO CUSTOMER'S ATTORNEY. ***NFA***

ERR02-027.1 0821

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 02-JUL-2003
 Note: All Costs are in US Dollars

| VIN | AWS VL | WERS VL | MKT DER | BODY CAB | VER SERIES | DRIVE TYPE | PLANT CD | TRANS CD | ENG COD | PROD DATE | WARR DATE | SELLING DEALER | SELL CNT | TIS | QRT | WCC | PREF | BASE | SUFF | VBT | VPG | COC | CD |
|-----------------------|--|------------------------------------|----------|-----------|------------|------------|------------|-------------|--------------|-------------|-----------|-----------------|----------------|-------------------------------|-------|---------------------------|------|---------|------|-----|-----|-----|----|
| 1FMCU04181KA78936 | M1 | | T/M1 | T/F | T/WB | T/EF | T/F | AJ | T/DJ | T/LD | 26-02-01 | 08-03-01 116212 | USA | 7 | * | 2004 | * | DIAG | * | S11 | V44 | E29 | 42 |
| AWS Claim Key: | 3509365 | Doc #: | 35117501 | Trx Code: | | 1 | Labor Hrs: | | 3 | Labor Cost: | | 20.61 | Material Cost: | | 0 | Total Cost: | | 20.61 | | | | | |
| Dir Cd-Sub Cd: | 00771-A | Name: UNION PARK FORD, INC. | | | | | Ph: | 302-6587245 | St DE | City | USA | Reg Cd: | NA | Repr Date: 05-SEP-2001 | | DIST (Mile): 6667 | | | | | | | |
| Cust Comments: | CUST STATES SES LIGHT ON AND VEH LOCKED UP | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | PERFORMED DIAG TEST MID TEST AND ROAD TEST NO CODES PRESENT (UNABLE TO DUPLICAT CUST CONCERN AT THIS TIME) | | | | | | | | | | | | | | | | | | | | | | |
| 1FMCU04181KA78936 | M1 | | T/M1 | T/F | T/WB | T/EF | T/F | AJ | T/DJ | T/LD | 26-02-01 | 08-03-01 116212 | USA | 7 | * | 0704 | YL8Z | 7840030 | BA | S06 | V07 | N42 | 42 |
| AWS Claim Key: | 3509365 | Doc #: | 35117504 | Trx Code: | | 1 | Labor Hrs: | | 2 | Labor Cost: | | 13.74 | Material Cost: | | 0 | Total Cost: | | 13.74 | | | | | |
| Dir Cd-Sub Cd: | 00771-A | Name: UNION PARK FORD, INC. | | | | | Ph: | 302-6587245 | St DE | City | USA | Reg Cd: | NA | Repr Date: 05-SEP-2001 | | DIST (Mile): 6667 | | | | | | | |
| Cust Comments: | CUST STATES RATTLING NOISE COMING FROM TAILGATE | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | TRACED CONCERN TO TAIL BRACKETS LUBRICATED SAME | | | | | | | | | | | | | | | | | | | | | | |
| 1FMCU04181KA78936 | M1 | | T/M1 | T/F | T/WB | T/EF | T/F | AJ | T/DJ | T/LD | 26-02-01 | 08-03-01 116212 | USA | 7 | * | 7001 | YL8Z | 19805 | BA | S05 | V39 | N59 | 42 |
| AWS Claim Key: | 3803269 | Doc #: | 35250101 | Trx Code: | | 1 | Labor Hrs: | | 3 | Labor Cost: | | 20.6 | Material Cost: | | 42.7 | Total Cost: | | 63.3 | | | | | |
| Dir Cd-Sub Cd: | 00771-A | Name: UNION PARK FORD, INC. | | | | | Ph: | 302-6587245 | St DE | City | USA | Reg Cd: | NA | Repr Date: 17-SEP-2001 | | DIST (Mile): 7148 | | | | | | | |
| Cust Comments: | CUST STATES HEATER MAKES WHISTLING NOISE | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | CHECKED NOISE WHEN BLOWER IS ON TRACED NOISE TO BLOWER MOTOR REPLACED BLOWER MOTOR | | | | | | | | | | | | | | | | | | | | | | |
| 1FMCU04181KA78936 | M1 | | T/M1 | T/F | T/WB | T/EF | T/F | AJ | T/DJ | T/LD | 26-02-01 | 08-03-01 116212 | USA | 9 | * | 2004 | * | DIAG | * | S11 | V44 | E29 | 42 |
| AWS Claim Key: | 5028014 | Doc #: | 35E78001 | Trx Code: | | 1 | Labor Hrs: | | 3 | Labor Cost: | | 20.61 | Material Cost: | | 0 | Total Cost: | | 20.61 | | | | | |
| Dir Cd-Sub Cd: | 00771-A | Name: UNION PARK FORD, INC. | | | | | Ph: | 302-6587245 | St DE | City | USA | Reg Cd: | NA | Repr Date: 07-NOV-2001 | | DIST (Mile): 9037 | | | | | | | |
| Cust Comments: | CUST STATES VEH STALLS OUT WHILE DRIVING | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | (UNABLE TO VERIFY CONCERN) PERFORM MCS TEST NO CODES | | | | | | | | | | | | | | | | | | | | | | |
| 1FMCU04181KA78936 | M1 | | T/M1 | T/F | T/WB | T/EF | T/F | AJ | T/DJ | T/LD | 26-02-01 | 08-03-01 116212 | USA | 15 | * | 1803 | YF1Z | 91460 | AC | S11 | V44 | E29 | 42 |
| AWS Claim Key: | 8528188 | Doc #: | 37995802 | Trx Code: | | 587 | Labor Hrs: | | 4 | Labor Cost: | | 27.47 | Material Cost: | | 42.59 | Total Cost: | | 70.06 | | | | | |
| Dir Cd-Sub Cd: | 00771-A | Name: UNION PARK FORD, INC. | | | | | Ph: | 302-6587245 | St DE | City | USA | Reg Cd: | NA | Repr Date: 09-MAY-2002 | | DIST (Mile): 14844 | | | | | | | |
| Cust Comments: | CUST STATES SES LIGHT ON | | | | | | | | | | | | | | | | | | | | | | |
| Tech Comments: | VERIFIED CONCERN DIAG CODES FOUND REPLACED DPFE AND CLEARED | | | | | | | | | | | | | | | | | | | | | | |

E902-027.1 0822

1FMCU04181KA78936 M1 T/M1 T/F T/WB T/EF T/F AJ T/DI T/LD 26-02-01 08-03-01 116212 USA 15 * 7A01 EXT 40 R S09 V83 029 42
 AWS Claim Key: 8128189 Doc #: 37993803 Trx Code: E83 Labor Hrs: .3 Labor Cost: 20.6 Material Cost: 0 Total Cost: 20.6
 Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ph: 302-6587245 St: DE Ctry: USA Reg Cd: NA Rptg Date: 09-MAY-2002 DIST (Mile): 14844 (1)
 Cust Comments: CUST STATES BATTERY LIGHT COMES ON AT START UP
 Tech Comments: VERIFIED CONCERN CHECKED ALTERNATORE CHECKED ALL CONNECTION BATTERY TERMINAL NPF CHARGED BATTERY

1FMCU04181KA78936 M1 T/M1 T/F T/WB T/EF T/F AJ T/DI T/LD 26-02-01 08-03-01 116212 USA 15 * 6P04 YL&Z 7820125 AA S01 V31 B09 42
 AWS Claim Key: 8128189 Doc #: 37993804 Trx Code: E84 Labor Hrs: .3 Labor Cost: 13.74 Material Cost: 0 Total Cost: 13.74
 Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ph: 302-6587245 St: DE Ctry: USA Reg Cd: NA Rptg Date: 09-MAY-2002 DIST (Mile): 14844 (1)
 Cust Comments: CUSTOMER STATES DRIVERS FRONT DOOR RATTLES
 Tech Comments: VERIFIED CONCERN REMOVED DOOR PANEL INSTALLED FOAM TAPS IN THOSE AREA NO OTHER RATTLES FOUND

1FMCU04181KA78936 M1 T/M1 T/F T/WB T/EF T/F AJ T/DI T/LD 26-02-01 08-03-01 116212 USA 15 * 7G04 YL&Z 18519 AA S08 V74 T90 42
 AWS Claim Key: 8906749 Doc #: 38241901 Trx Code: E83 Labor Hrs: 0 Labor Cost: 0 Material Cost: 4.41 Total Cost: 4.41
 Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ph: 302-6587245 St: DE Ctry: USA Reg Cd: NA Rptg Date: 09-MAY-2002 DIST (Mile): 15110 (1)
 Cust Comments: CUST STATES CONTROL FOR MODE SELECTION BROKEN
 Tech Comments: REPLACED MODE CONTROL KNOB

1FMCU04181KA78936 M1 T/M1 T/F T/WB T/EF T/F AJ T/DI T/LD 26-02-01 08-03-01 116212 USA 18 * 7A01 * 10654 * S09 V83 029 42
 AWS Claim Key: 10021216 Doc #: 39097305 Trx Code: E83 Labor Hrs: .6 Labor Cost: 42.12 Material Cost: 0 Total Cost: 42.12
 Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ph: 302-6587245 St: DE Ctry: USA Reg Cd: NA Rptg Date: 05-AUG-2002 DIST (Mile): 17700 (1)
 Cust Comments: CUST STATES BATTERY LIGHT COMES ON WHEN STARTING UP STAYS FOR TIME
 Tech Comments: TESTED BATTERY OK COOLANT LIGHT WAS ON CHECKED FOR LEAKS AND TOPPED OFF FLUID

1FMCU04181KA78936 M1 T/M1 T/F T/WB T/EF T/F AJ T/DI T/LD 26-02-01 08-03-01 116212 USA 18 * 6C06 YL&Z 7845440 AAB S08 V74 T90 42
 AWS Claim Key: 10238520 Doc #: 39235601 Trx Code: E84 Labor Hrs: .2 Labor Cost: 14.04 Material Cost: 100.1 Total Cost: 114.14
 Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ph: 302-6587245 St: DE Ctry: USA Reg Cd: NA Rptg Date: 14-AUG-2002 DIST (Mile): 17874 (1)
 Cust Comments: CUST STATES CARGO COVER WILL NOT RETRACT
 Tech Comments: VERIFIED CONCERN REPLACED CARGO COVER

1FMCU04181KA78936 M1 T/M1 T/F T/WB T/EF T/F AJ T/DI T/LD 26-02-01 08-03-01 116212 USA 21 * 6H06 2L&Z 7823200 HA S06 V09 G07 42
 AWS Claim Key: 11778669 Doc #: 40493002 Trx Code: E84 Labor Hrs: .5 Labor Cost: 35.1 Material Cost: 56.25 Total Cost: 91.35
 Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ph: 302-6587245 St: DE Ctry: USA Reg Cd: NA Rptg Date: 15-NOV-2002 DIST (Mile): 20286 (1)
 Cust Comments: CUST STATES PS FRONT WINDOW IS SLOW AND NOISEY
 Tech Comments: VERIFIED CUST CONCERN WITH PS FRONT WINDOW REPLACED WINDOW REG ASSY WITH MOTOR

1FMCU04181KA78936 M1 T/M1 T/F T/WB T/EF T/F AJ T/DI T/LD 26-02-01 08-03-01 116212 USA 23 * 2803 2L&Z 9E926 AB S11 V44 D50 69
 AWS Claim Key: 12664311 Doc #: 41350303 Trx Code: S07 Labor Hrs: .7 Labor Cost: 49.14 Material Cost: 107.56 Total Cost: 156.7
 Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ph: 302-6587245 St: DE Ctry: USA Reg Cd: NA Rptg Date: 24-JAN-2003 DIST (Mile): 22326 (1)
 Cust Comments: CUST STATES ACCELERATOR PEDAL STICKING

ERR2-027.1 0823

Tech Comments: PERFORMED NGS TEST NO CODES PERFORMED PID DATA TEST TRACED CONCERN TO THROTTLE BODY STICKING REMOVED AND REPLACED

1FMCU04181KA78936 M1 T/M1 T/F T/WE T/EF T/F AJ T/D1 T/LD 26-02-01 08-03-01 116212 USA 25 * 7G01 YL8Z 19801 DA S09 V79 C20 42
AWS Claim Key: 13305418 Doc #: 41825201 Trx Code: EE3 Labor Hrs: .3 Labor Cost: 31.06 Material Cost: 42.7 Total Cost: 63.76
Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ptn: 302-6587245 Sct DE Ctry USA Reg Cd: NA Repr Date:06-MAR-2003 DIST (Mile):23500
Cost Comments: CUST STATES FAN MAKE SHITTELING NOISE
Tech Comments: VERIFIED CONCERN TRACED TO BLOWER MOTOR INTERNAL BEARING CONCERN REPLACED BLOWER MOTOR

1FMCU04181KA78936 M1 T/M1 T/F T/WE T/EF T/F AJ T/D1 T/LD 26-02-01 08-03-01 116212 USA 25 * 1F06 1L8Z 8A000 BE S09 V83 G29 42
AWS Claim Key: 13588453 Doc #: 41984401 Trx Code: EB4 Labor Hrs: 1.1 Labor Cost: 77.22 Material Cost: 51.55 Total Cost: 128.77
Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ptn: 302-6587245 Sct DE Ctry USA Reg Cd: NA Repr Date:18-MAR-2003 DIST (Mile):24653
Cost Comments: CUST STATES BATTERY LIGHT KEEPS COMING ON AND OFF
Tech Comments: ROAD TESTED VEH DID HAVE LOW COOLANT LIQT COMB ON FILLED TANK TO FULL LINE AND TESTED SMALL LEAK AT SEAM REPLACED COOLANT TANK

1FMCU04181KA78936 M1 T/M1 T/F T/WE T/EF T/F AJ T/D1 T/LD 26-02-01 08-03-01 116212 USA 25 * 2G04 * DIAG * S11 V44 E29 42
AWS Claim Key: 13588444 Doc #: 41984402 Trx Code: EB4 Labor Hrs: .2 Labor Cost: 14.04 Material Cost: 0 Total Cost: 14.04
Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ptn: 302-6587245 Sct DE Ctry USA Reg Cd: NA Repr Date:18-MAR-2003 DIST (Mile):24653
Cost Comments: CUST STATES VEH STALLS AND CHECK ENGINE LIGHT COMES ON AND STALLS
Tech Comments: CHECKED FOR CONCERN NO STALLING OCCURRED TEST DROVE VEH 60 MILES VEH DIDNOT STALL OR SHOW SYMPTOME OF STALLING

NPF

1FMCU04181KA78936 M1 T/M1 T/F T/WE T/EF T/F AJ T/D1 T/LD 26-02-01 08-03-01 116212 USA 28 * 7G04 YL8Z 18519 AA S09 V79 C20 42
AWS Claim Key: 14642888 Doc #: 43069901 Trx Code: EE3 Labor Hrs: .1 Labor Cost: 7.27 Material Cost: 4.68 Total Cost: 11.95
Dir Cd-Sub Cd: 00771-* Name: UNION PARK FORD, INC. Ptn: 302-6587245 Sct DE Ctry USA Reg Cd: NA Repr Date:05-JUN-2003 DIST (Mile):25968
Cost Comments: CUST STATES THE TEMP CONTROL KNOB IS BROKEN
Tech Comments: VERIFIED CONCERN THAT STEM OF TEMP CONTROL KNOB IS BROKEN REMOVED STEEL SLEEVE FROM POST AND INSTALLED NEW TEMP CONTROL KNOB

Any comments? You can contact

webmaster

ENG2-027.1 0824



KIMMEL & SILVERMAN
P.C.

ROBERT M. SILVERMAN *
CRAIG THOR KIMMEL **

* ALSO MEMBER OF NEW YORK AND NEW JERSEY BARS
** ALSO MEMBER OF NEW YORK BAR
*** ALSO MEMBER OF NEW JERSEY BAR

30 EAST BUTLER FREE
AMBLER, PA 19002

1-800-LEMON LAW
P (215) 340-2222
F (215) 340-2217

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JACQUELINE C. HERUITT*
ROBERT A. RAPKIN
VIVIAN BENE PERKIN*
AMY D. COX*
LOUIE DOBT, JR*
SHANNON M. RYAN*
DIANA TANQUENT*
MAYLEE M. MERRONS*
LINDSAY D. HOFFMAN

July 11, 2003

VIA TELEFAX ONLY
(313) 845-5555

Mr. Vince Kirksey
Ford Consumer Affairs
16800 Executive Plaza Drive 3NE-301
Dearborn, Michigan 48126

RE: [REDACTED] v. Ford Motor Company
2001 Ford Escape
VIN: 1FMCU04181KA78936
Zip Code: 19711
Selling Dealer: Union Park Ford

Dear Mr. Kirksey:

Please accept this letter as confirmation that your client has made no offer in the above matter. Therefore, I have no choice but to place this matter in suit as soon as possible. Unless I hear from you, I will assume your offer remains unchanged. Although we may not be able to settle this case, I nevertheless appreciate the time you took to review the facts and discuss settlement with me.

Please be advised that suit will be filed if we have not reached a settlement on or before 7/18/03. In the meantime, please call or write me if you need any additional information or documentation.

Very truly yours,


Robert M. Silverman

RMS:vas

[Redacted]

2003

0278283362 PITTSBURGH

EA02-027.1 0126

CONSUMER AFFAIRS

| | DATE | TIME | TO/FROM | MODE | MIN/SEC | PAGES | CMDR | STATUS |
|----|-------|-------|--------------|-------|---------|-------|------|--------|
| 32 | 01/16 | 11:25 | 215 540 8817 | EC--S | 00:27 | 002 | 189 | OK |



rd

Fax Cover Sheet

TO: Robert Silverman
COMPANY: Kimmel & Silverman
PHONE: 215-540-8888
FAX: 215-540-8817

FROM: Ruth Davis
COMPANY: Ford Motor Company, Consumer Affairs Office
PHONE: 313-845-5539
FAX: 313-845-5555

Date: 01/16/2003

Number of Pages: 2
 (including cover)

COMMENTS: [REDACTED]

Mail Address:

Ford Consumer Affairs
 16800 Executive Parkway
 P.O. Box 6248
 MD 3NE-B
 Dearborn, MI 48126



rid

Fax Cover Sheet

TO: Robert Silverman
COMPANY: Kimmel & Silverman
PHONE: 215-540-8888
FAX: 215-540-8817

FROM: Ruth Davis
COMPANY: Ford Motor Company, Consumer Affairs Office
PHONE: 313-845-5539
FAX: 313-845-5555

Date: 01/16/2003

Number of Pages: 2
(including cover)

COMMENTS: [REDACTED]

Mail Address:

Ford Consumer Affairs
16800 Executive Parkway
P.O. Box 6248
MD 3NE-B
Dearborn, MI 48126

Ford Motor Company

Consumer Affairs

Sent via Fax

January 16, 2003

Mr. Robert Silverman
Kimmel & Silverman
30 East Butler Pike
Ambler, PA 19002

RE: [REDACTED]
2002 Ford Escape
VIN: 1FMYU02132KD52389

Dear Mr. Silverman:

This letter is in response to your letter dated December 31, 2002 regarding the above-mentioned client.

Ford Motor Company has reviewed your client's claim. Unfortunately, we are unable to offer any assistance at this time.

Thank you for the opportunity to review this concern.

Respectfully yours,

Ruth Davis

Ruth Davis
Consumer Affairs



Close an Issue

VIN: 1FMYU02132KD52389

Year: 2002

Model: ESCAPE

WSD: 2002-07-29

Name: [REDACTED]

Primary Phone: [REDACTED]

Secondary Phone: [REDACTED]

Address: [REDACTED] WEST SUNBURY PA [REDACTED]

Case Number: 278283382

Issue Type: 07-LEGAL

Reason: LEGAL - OTHER ATTORNEY DEMAND

Symptom: STALL/QUITS AT IDLE ALL ENGINE TEMP

Dealer: F44489 - BUTLER COUNTY M

Comen Type: FAX [REDACTED]

Current Odometer Reading: 10443 MI

Action Category: REDIRECT/REFERRAL/FINAL CASE DISPOSITION [REDACTED]

Odometer Reading: 10443 MI

Action: FINAL CASE DISPOSITION(C) [REDACTED]

Caller information if different from vehicle owner

First Name: [REDACTED]

Middle Initial: [REDACTED]

Last Name: [REDACTED]

Relationship: Select One [REDACTED]

Phone: [REDACTED]

Comments:

Received report from FSE - deny assistance - send attorney letter

Warranty History

ESP/Recall

Case

[REDACTED]

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 14-JAN-2003
 Note: All Costs are in US Dollars

DENY

| VIN | AWS VL | WERS VL | MKT DER | BODY CAB | VER SERIES | DRIVE TYPE | PLANT CD | TRANS CD | ENG COO | PRD DATE | WARR DATE | SE. DEA | F | BASE | SUFF | VRT | VFG | CCC | CD | | | | |
|---|--------|---------|---------|----------|------------|------------|----------|----------|---------|----------|-----------|---------|-----|------|------|--------|------|--------|-----|-----|-----|-----|----|
| 1FMYU02132KD52389 | MI | T/M1 | T/F | T/WB | T/EP | T/F | AJ | T/DJ | T/LD | 17-05-02 | 29-07-02 | 144469 | | 3001 | * | S10 | V19 | H26 | 07 | | | | |
| AWS Claim Key: 2363706 Doc #: 1063411 Trx Code: 2 Labor Hrs: 8 Labor Cost: 47.24 Dir Cd-Sub Cd: 07436-* Name: BUTLER COUNTY MOTOR CO Pk: 724-2872766 St: PA City: USA Reg Cd: NA Repr Date: 14-NOV-2002 DISTR(Mile): 1769 Tech Comments: Done To Lock | | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU02132KD52389 | MI | T/M1 | T/F | T/WB | T/EP | T/F | AJ | T/DJ | T/LD | 17-05-02 | 29-07-02 | 144469 | USA | 3004 | * | 12A650 | * | S11 | V42 | D21 | 42 | | |
| AWS Claim Key: 2429351 Doc #: 1069491 Trx Code: 507 Labor Hrs: 5 Labor Cost: 295.27 Material Cost: 212.73 Total Cost: 508 Dir Cd-Sub Cd: 07436-* Name: BUTLER COUNTY MOTOR CO Pk: 724-2872766 St: PA City: USA Reg Cd: NA Repr Date: 14-NOV-2002 DISTR(Mile): 9439 Tech Comments: PERFORMED ALL CHECKS PER FEE RANDALL CORLEW AND CHECK LIST | | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU02132KD52389 | MI | T/M1 | T/F | T/WB | T/EP | T/F | AJ | T/DJ | T/LD | 17-05-02 | 29-07-02 | 144469 | USA | 5 | * | 2001 | 2U7Z | 12A650 | C2B | S11 | V43 | D02 | 42 |
| AWS Claim Key: 2696439 Doc #: 068226A Trx Code: 507 Labor Hrs: 9.4 Labor Cost: 653.3 Material Cost: 320.67 Total Cost: 973.97 Dir Cd-Sub Cd: 03273-* Name: LIBERTY FORD SOUTHWEST, INC. Pk: 440-8882800 St: OH City: USA Reg Cd: NA Repr Date: 02-DEC-2002 DISTR(Mile): 9375 Cust Comments: CUST STATES THE CAR WILL CRANK AND START, BUT PUTTING IT IN GEAR IT WILL STALL OUT Tech Comments: EEC TEST NO CODES PIN POINT TEST PID MONITOR TEST CK FUEL PRESSURE CK CAM TIMING REPLACE CAM SENSOR REPLACE ALL SPARK PLUGS REPLACE CAM AND CRANK SENSOR RE START WOULD NOT STAY RUNNING CK MAF AND BOO ERRATIC 12.5 VOLTS CALLED TECH HOT LINE REPLACE PCM CUT AND PROGRAM NEW KEY STARTED AND RD TEST GABLES RE START SEVERAL TIMES OK | | | | | | | | | | | | | | | | | | | | | | | |
| 1FMYU02132KD52389 | MI | T/M1 | T/F | T/WB | T/EP | T/F | AJ | T/DJ | T/LD | 17-05-02 | 29-07-02 | 144469 | USA | 5 | * | 6Y20 | * | MISC | * | SXX | V00 | A5* | 42 |
| AWS Claim Key: 4012796 Doc #: 10917501 Trx Code: F08 Labor Hrs: 0 Labor Cost: 0 Material Cost: 0 Total Cost: 127.7 Dir Cd-Sub Cd: 07436-* Name: BUTLER COUNTY MOTOR CO Pk: 724-2872766 St: PA City: USA Reg Cd: NA Repr Date: 23-DEC-2002 DISTR(Mile): 10443 Tech Comments: Done To Replace | | | | | | | | | | | | | | | | | | | | | | | |

Any comments? You can contact

webmaster

ENR2-027.1 0831

Action Detail

| | | | |
|---|---------------------------|--------------------------------------|-----------------|
| VIN: 1FMYU02132KD52368 | Year: 2002 | Model: ESCAPE | Case: 278283362 |
| Name: M&N GREGORY A HAJEK | Owner Status: Original | WSD: 2002-07-29 | |
| Symptom Desc: STALL/QUITS DECELERATION HOT ENGINE | | Primary Phone: 724-287-7380 | |
| Reason Desc: AWA - VIN CRITERIA, REQUEST AWA AFT | | Secondary Phone: 724-287-7380 | |
| Issue Type: 03 CONCERN | Issue Status: CLOSED | Dealer: LIBERTY FORD SOUTHWEST, INC. | |
| Origin Desc: DEALER | | P & A Code: 03273 | |
| Action Desc: FORD COVERED REPAIR MADE - WARRANTY | | | |
| Odometer: 9000 MI | Comm Type: PHONE | | |
| Action Date: 12/10/2002 | Action Time: 10:47:41:620 | Action Data: No | |
| Analyst Name: cliff werner | Analyst: C-WARNEZ | | |

COMMENTS: THERE WAS NO NEED TO OFFER AWA THE VEHICLE WAS WITHIN BUMPER TO BUMPER WARRANTY AND TE VEHICLE WAS REPAIRED TO THE SATISFACTION OF THE CUSTOMER

E902-027.1 0002

Davis, Ruth (R.I.)

Ford Motor Company

From: Corlew, Randall (R.L.)
Sent: Tuesday, January 14, 2003 4:56 PM
To: Davis, Ruth (R.I.)
Subject: RE: [REDACTED]

Ruth, Consumer Affairs

I talked with Marshall Thompson (Service Manager) at Butler Co. Ford and he advised me that the vehicle was in for a cam sensor code, the next time they hit a Deer and it broke the cam sensor and it's mount. After that the vehicle was at another dealer Marshall was told and they worked on it. Then it was in Butler Co. Ford and they could not verify any concern. That is all I could find out.

Thank you,

Randy Corlew

Ford Motor Company
FSE-Pittsburgh Region

---Original Message---

From: Davis, Ruth (R.I.)
Sent: Tuesday, January 14, 2003 9:23 AM
To: Belotti, Paul (P.S.)
Cc: Corlew, Randall (R.L.)
Subject: [REDACTED]

Hi Guys,

I have received an attorney demand for lemon law on this vehicle. If you have any information about this vehicle or customer that would assist me with a decision, please let me know.

I only show 2 stalling repairs - one in which I think Randy assisted (maybe by phone)

| | | | |
|---|---------------------------|--------------------------------|-----------------|
| VIN: 1FMYU02132KD52388 | Year: 2002 | Model: ESCAPE | Case: 278283382 |
| Name: [REDACTED] | Owner Status: Original | WSD: 2002-07-29 | |
| Symptom Desc: STALL/QUITS AT IDLE ALL ENGINE TEMP | | Primary Phone: [REDACTED] | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: [REDACTED] | |
| Issue Type: 07 LEGAL | Issue Status: OPEN | Dealer: BUTLER COUNTY MOTOR CO | |
| Origin Desc: CA-LITIGATION PREVENTION-FRONT DESK | | P & A Code: 07436 | |
| Odometer: 10443 MI | Comm Type: FAX | | |
| Action Date: 01/13/2003 | Action Time: 13:59:23:557 | Action Data: | |
| Analyst Name: CHERE LEICH | Analyst: CLEICH | | |

COMMENTS: *****ATTORNEY DEMAND***** FAX RECEIVED 12-31-02 ATTORNEY ALLEGES CLIENT'S VEHICLE HAS BEEN SERVICED FOR A CHRONIC STALLING CONCERN. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Ruth Davis

Litigation Prevention Analyst
Pittsburgh Region
Phone 313-845-5539
Fax 313-845-5555



Davis, Ruth (R.I.)

Ford Motor Company

From: Corlew, Randall (R.L.)
Sent: Tuesday, January 14, 2003 3:37 PM
To: Davis, Ruth (R.I.)
Subject: RE: [REDACTED]

Ruth, Consumer Affairs

No I do not have any knowledge of this vehicle. I do know if the last TSB was followed and completed the stall will be fixed.

Thank you,

Randy Corlew

Ford Motor Company
FSE-Pittsburgh Region

-----Original Message-----

From: Davis, Ruth (R.I.)
Sent: Tuesday, January 14, 2003 9:23 AM
To: Belote, Paul (P.S.)
Cc: Corlew, Randall (R.L.)
Subject: [REDACTED]

Hi Guys,

I have received an attorney demand for lemon law on this vehicle. If you have any information about this vehicle or customer that would assist me with a decision, please let me know.

I only show 2 stalling repairs - one in which I think Randy assisted (maybe by phone)

| | | | |
|---|---------------------------|--------------------------------|-----------------|
| VIN: 1FMYU02132KD62368 | Year: 2002 | Model: ESCAPE | Case: 276283362 |
| Name: [REDACTED] | Owner Status: Original | WBD: 2002-07-29 | |
| Symptom Desc: STALL/QUITS AT IDLE ALL ENGINE TEMP | | Primary Phone: [REDACTED] | |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | Secondary Phone: [REDACTED] | |
| Issue Type: 07 LEGAL | Issue Status: OPEN | Dealer: BUTLER COUNTY MOTOR CO | |
| Origin Desc: CA-LITIGATION PREVENTION-FRONT DESK | | P & A Code: 07436 | |
| Odometer: 10443 MI | Comm Type: FAX | | |
| Action Date: 01/13/2003 | Action Time: 13:59:23:557 | Action Date: | |
| Analyst Name: CHERIE LEICH | Analyst: CLEICH | | |

COMMENTS: *****ATTORNEY DEMAND***** FAX RECEIVED 12-31-02 ATTORNEY ALLEGES CLIENT'S VEHICLE HAS BEEN SERVICED FOR A CHRONIC STALLING CONCERN. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Ruth Davis

Litigation Prevention Analyst
Pittsburgh Region
Phone 313-845-5539
Fax 313-845-5555



Customer Info

Customer: [REDACTED] Primary Phone: [REDACTED] Secondary Phone: [REDACTED]
Address: [REDACTED] WEST SUNBURY PA [REDACTED]
Country: USA Language: EN
Cell Phone: [REDACTED] Pager:
Preferred Contact method: Fac
Preferred Contact Time: Email

ENR2-827.1 0836

ESP / Recall Information

VIN: 1FMYU02132KDS2389

No ESP Information for this VIN

No Recall Information for this VIN

E082-027.1 0038

Update This Information In Stars

Dealer Detail

| FCSD Region | Sales Region | Sales Zone | Market | PBA Code | Sales Code |
|---------------|---------------|------------|--------|----------|------------|
| 44-PITTSBURGH | 44-PITTSBURGH | D | A2 | 07436 | F44469 |

Dealer Name: BUTLER COUNTY MOTOR CO
Dealer Address: 400 S MAIN ST
 BUTLER PA 16001
Dealer Main Phone: 412-287-2788

Dealer Service Phone: 724-287-2788

| Position | Employee Name |
|--------------------------|---------------------|
| CUST RELATIONS MGR | MARSHALL W THOMPSON |
| DEALER/PARTNER | ANTHONY G JOHNS |
| GENERAL MANAGER | DAVID L MCFARLAND |
| PARTS MANAGER | WILLIAM L CORADI |
| PARTS & SERVICE DIRECTOR | CATHERINE J GLASGOW |
| SALES MANAGER | KENNETH J GALVAN |
| SERVICE MANAGER | MARSHALL W THOMPSON |

5012-027.1 0097

VIN
1FMYU02132KD52389

Year Model
2002 ESCAPE
Open Issue Exist

Vehicle List
Sales Type
INDIVIDUAL RTL

Owner Status
Original Owner

Vehicle Info
Costs
Warranty History

EM02-027.1 0030

Davis, Ruth (R.I.)

To: Belote, Paul (P.S.)
Cc: Corlew, Randall (R.L.)
Subject: [REDACTED]

Hi Guys,

I have received an attorney demand for lemon law on this vehicle. If you have any information about this vehicle or customer that would assist me with a decision, please let me know.

I only show 2 stalling repairs - one in which I think Randy assisted (maybe by phone)

| | | | |
|---|------------------------|-----------------|-----------------------------|
| VIN: 1FMYU02132KD52388 | Year: 2002 | Model: ESCAPE | Case: 278283382 |
| Name: [REDACTED] | Owner Status: Original | WSD: 2002-07-29 | |
| Symptom Desc: STALL/QUITS AT IDLE ALL ENGINE TEMP | | | Primary Phone: [REDACTED] |
| Reason Desc: LEGAL - OTHER ATTORNEY DEMAND | | | Secondary Phone: [REDACTED] |

| | | | |
|--|---------------------------|--------------------------------|-------------------|
| Issue Type: 07 LEGAL | Issue Status: OPEN | Dealer: BUTLER COUNTY MOTOR CO | |
| Origin Desc: CA-LITIGATION PREVENTION-FRONT DESK | | | P & A Code: 07436 |
| Originator: 10443 MI | Comm Type: FAX | | |
| Action Date: 01/13/2003 | Action Time: 13:59:23:667 | Action Data: | |
| Analyst Name: CHERIE LEICH | Analyst: CLECH | | |

COMMENTS: *****ATTORNEY DEMAND***** FAX RECEIVED 12-31-02 ATTORNEY ALLEGES CLIENT'S VEHICLE HAS BEEN SERVICED FOR A CHRONIC STALLING CONCERN. ATTORNEY DEMANDS CONTACT FROM FORD REPRESENTATIVE.

Ruth Davis
Litigation Prevention Analyst
Pittsburgh Region
Phone 313-845-5539
Fax 313-845-5555



CASE:
278283362
Region: 14
Ruth A2

ROBERT M. SILVERMAN
CRAIG THOR KIMMEL

30 EAST BUTLER PIKE
AMBLER, PA 19002

1-800-LEMON LAW
P (215) 540-8888
F (215) 540-8817

www.kimmels.com

December 31, 2002

AMY D. COX
LOUIS DOBLER
SHANNON M. RYAN
DANA TARQUINI
MAYLES WICKENS

GLENN L. GERBER
of Counsel

* ALSO MEMBER OF NEW YORK AND NEW JERSEY BARS
** ALSO MEMBER OF NEW YORK BAR
*** ALSO MEMBER OF NEW JERSEY BAR

VIA TELEFAX ONLY
(313) 845-5555

Matt Wycaver
Ford Consumer Affairs
16800 Executive Plaza Drive 3NE-301
Dearborn, Michigan 48126

RE: [REDACTED] v. Ford Motor Company
2002 Ford Escape
VIN: 1FMYU02132KD52389
Zip Code: 16061
Selling Dealer: Butler County Ford

Dear Mr. Wycaver:

Please take notice that I represent the captioned individual in his claim against Ford. Please take the steps necessary to advise all Ford Personnel and dealership personnel that I am [REDACTED]'s counsel and there should be no contact with my client, except for contact necessary to implement current repair attempts. I am writing this letter as an effort to work out a pre-litigation settlement and any attempts to contact my client directly will result in the immediate filing of suit and a request for an injunction and sanctions.

As you will notice from your Warranty History as well as any dealership records you review, my client's vehicle is a presumptive lemon. Specifically, the vehicle has been serviced by Butler County Ford for chronic stalling

Matt Wycaver
December 31, 2002
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Plaintiff hereby demands the statutory repurchase of the vehicle, plus payment of counsel fees and costs in the bottom line amount of \$1,500.00. I would also be willing to discuss a vehicle swap, but only if the terms are favorable to my client, who is a loyal Ford Customer.

Please be advised that suit will be filed if we have not reached a settlement on or before 1/21/03. In the meantime, please call or write me if you need any additional information or documentation.

Very truly yours,

Robert M. Silverman

RMS:vas