

PE06-013
VOLVO
5/5/2006
ATTACHMENT
PART 1 OF 3

Same complaint as specified on SR-1-51498201

Service Request Activity (4)

VPSS

SR Number :	1-51810981	Account Name :	O'CONNOR MOTOR	Priority :	Medium
Date Opened :	10/12/2004 11:10:47AM	Severity :	3-Medium	Owner :	
Date Closed :	10/12/2004 4:41:12PM	Customer Ref. Id :		Status :	Closed
Serial No :	4V5K89GH14N				

Description :

Customer called in to advise that on 07/23/04 the rear stud sheered off, the tire came off and the rear dropped. Customer called the O'Connor Volvo in ME where he purchases the truck. Dealership advise that it is not covered under warranty. Customer then repaired truck and paid for cost. Never was reimbursed.

On 10/08/04 it happen again this time on the right rear. Customer refuse to pay for second repair.

vin# [REDACTED]
title# [REDACTED]
call# [REDACTED]
Owner [REDACTED]
DIS 04/07/04
RV000401 2
RV000402 1
Billing c/r 62140
SP254002
SP284012 2
SP284013
SP284014
SP284015
Standard Warrant, Heavy Duty
Volvo engine
Accum 31,485.57

Activities

10/13/04 11:21:54AM

JAMES

Email - Outbound

Done

Jeff Roy 1-51810861

The following service request has been assigned to you:

Service Request Number: 1-51810861

Date Opened : 10/13/2004 11:10:47 AM
 Severity : 3-Medium
 Priority : Medium
 Product : VHD84F
 Abstract : Customer Complaint
 Description : Customer called in to advise that on 07/23/04 the rear stud sheared off, the tire came off and the rear dropped. Customer called the O'Connor Volvo in ME where he purchase the truck. Dealership advise that it is not covered under warranty. Customer then repaired truck and paid for cost. Never was reimbursd.

On 10/09/04 it happen again this time on the right rear. Customer refuse to pay for second repair.

Vin# [REDACTED]
 tel# [REDACTED]
 cell# [REDACTED]
 Owner [REDACTED]
 DIS 04/07/04
 RVX00401 2
 RVX00402 1
 Sailing dir 6214D
 SP284002
 SP284012 2
 SP284013
 SP284014
 SP284015
 Standard Warrant, Heavy Duty
 Volvo engine
 Accum \$1,493.57

10/18/04 04:38:38PM DT4684X

NEWMAN

Correspondence

Done

Comments

See comments and inspection report on case 1-51498201

Customer Complaint, Field Report

SR Number: 1-51486201 Account Name: O'CONNOR MOTOR Priority: Medium
 Date Opened: 10/11/2004 10:44:58AM Severity: 2-High Owner: [REDACTED]
 Date Closed: 4/22/05 3:30:51PM Customer Ref. Id: Status: Closed
 Serial No: 4V5K99GH14N [REDACTED]

Description:

WARRANTY CONTACTED DSM-JOHN CROTT'S EX 469Z. CUSTOMER CONTACTED WARRANTY REF. WHEEL MOUNTING CONCERN. DSM CONTACTED THE CUSTOMER. [REDACTED]
 2ND CONCERN ABOUT REAR WHEEL MOUNTING. WILL TRANSFER TO LOCAL DSM, JOE NEWMAN. DON BRADY-DSM

Activities

10/11/04 10:58:15AM

BRADY

Email - Outbound

Done

Assignment
Notification

The following service request has been assigned to you:

Service Request Number: 1-51486201

Date Opened: 10/11/2004 10:44:58 AM

Severity: 2-High

Priority: Medium

Product: VHD64F

Abstract: REAR WHEEL MOUNTING

Description: WARRANTY CONTACTED DSM-JOHN CROTT'S EX 469Z.
 CUSTOMER CONTACTED WARRANTY REF. WHEEL MOUNTING CONCERN.
 DSM CONTACTED THE CUSTOMER. [REDACTED] 2ND
 CONCERN ABOUT REAR WHEEL MOUNTING. WILL TRANSFER TO LOCAL
 DSM, JOE NEWMAN. DON BRADY-DSM

10/19/04 04:20:51PM UT4884X

Customer Visit

Done

Material Inspection and
Customer Discussion

Went to customer's location to inspect truck and failure on 10/14/04. Found Right Rear Wheel broken wheel studs, rims fall off truck. Hub pilot wheels, when rims. As per customer, no injuries or property damage at time of failure. Customer stated this is a 2nd failure on this truck, the first failure was on the Left Rear Rear in July 2004. Customer repaired that time himself. Examined parts from that failure. Discussed issue with customer and customer states he torques wheel to specs 450ftlbs using a torque wrench and multiplier. Customer stated he torques wheels every service, every 10 to 15,000 miles. Stated to me that he torqued all wheels in July when he had the 1st failure. Did not have mileage available from that failure. Customer states that he was told by the Mass DOT that this is a problem on the Volvo Truck and they have seen the same issue before. The customer also contacted another large Volvo fleet, PA Landers, who told him they had the same issue on 2 new trucks. Customer wants answer as to why this happened and why Volvo will not pay under warranty. Explained that wheels are a maintenance item and have a limited warranty. Offer to customer to send hub in and have the studs tested and will report back findings before making any comment or commitment. Will ship hub to TMAC for inspection. Customer stated that he will be contacting NHTSA about this issue. He did not mention any legal action at this time. Also, he has never had a problem on the Forward rear axle

10/19/04 04:31:32PM UT4884X

Customer Visit

Done

Customer Discussion

Customer to repair truck himself at this time because we cannot give him warranty. While inspecting the truck, I found that the Left Rear Rims appear to be loose again. Pointed this out to the customer. Suggested that he check that wheel again also. See attached pictures.

10/20/04 07:28:41AM UT00145

Correspondence

Done

Tell Me,Send Me

041020. Hello Joe, Answer some questions: Which axle and wheel end are we talking about? What is application, duty cycle? send hub, studs, wheel nuts to TMAC, Attn SPRADLIN, 4100 Bob White Blvd, Pulaski Va 24301, phone 640-874-7384. put SR number on carton label.

10/20/04 07:52:43AM

Email - Outbound

Done

1-51498201

Hello Joe,

Please see my activity, answer some questions like, which axle, which hub, what duty cycle, and send the hub to TMAC/Attn Spradlin, include SR #.

Thanks,

Warren

10/22/04 02:12:48PM UT4884X

Correspondence

Done

Parts Shipment

Hub from 1st failure sent to Warren Spradlin @ TMAC today. Hub was the 1st failure, from the Left Rear Wheel position. Has 1 broken stud in it. Discussed with Warren. He will examine and report. Truck is a dump truck application.

04/07/05 03:35:41PM UT4884X

Resolution

Done

Follow up Resolution

Determination of failure not conclusive. Discussed with customer. Provide parts to customer for goodwill resolution. Issue resolved. Customer satisfied with resolution. Discussed with RSM.







SR Number : 1-92629001 Account Name : O'CONNOR MOTOR
 Date Opened : 10/2/2006 10:34:33AM Severity : 3-Medium
 Date Closed : 11/14/2006 2:45:00PM Customer Ref. Id :
 Serial No : 4V5K38GH14N1

Description :

Refer back to SR #1-91810981 & 1-91888201 in 10/05.
 Customer's wheel studs have shed and causing problems again. It happened on 9/13/05. On 10/03/05 customer set an appointment for another recall repair(wheels and spacer I believe) and was told by dealer that there is also a recall on the wheel studs, etc that he has been having trouble with all this time. Customer also has a letter from the Department of Transportation he wants to fax. He wants to be addressed on the situation and the recall that he has heard about. Says this problem has cost him a lot of downtime and money for towing; his appointment with dealer for other warranty repairs are scheduled for tonight 10/3/05.

Activities

10/05/05 11:18:06AM

ALLOWAY

Email - Outbound

Done

Assignment
Notification

The following service request has been assigned to you:

Service Request Number: 1-92629001

Date Opened : 10/2/2006 10:34:33 AM

Severity : 3-Medium

Priority : Medium

Product : VHD84F

Abstract : Jeff Roy

Call

#360408

Description : Refer back to SR #1-91810981 in 10/04.
 Customer's wheel studs have shed and causing problems again. It happened on 9/13/05. On 10/03/05 customer set an appointment for another recall repair(wheels and spacer I believe) and was told by dealer that there is also a recall on the wheel studs, etc that he has been having trouble with all this time. Customer also has a letter from the Department of Transportation he wants to fax. He wants to be addressed on the situation and the recall that he has heard about. Says this problem has cost him a lot of downtime and money for towing; his appointment with dealer for other warranty repairs are scheduled for tonight 10/3/05.

10/07/05 04:41:51PM	UT4884X	NEWMAN	Call	Done	Follow Up 10-7-05	Called and spoke to customer on 10-7-05. Plan is for truck to go back to dealer week of 10-10-05. Left Rear Rear wheel hub to be replaced at no charge to customer. All other wheel positions to be checked. If hubs are ok, I will replace studs in other 3 hubs. If hubs are damaged, new hubs will be installed. Discussed recall with Jeff. He removed wheel spacers 9-20-05. This may explain recent stud breakage. Recall performed on 10-6-05. Also, discussed additional bills. Advised Jeff that I cannot pay downtime, but will look at low bills and replacement rim charges from last failure. He will fax invoices to me. Jeff satisfied with resolution at this time. Will follow up after looking at bills.
11/14/05 02:40:14PM	UT4884X	NEWMAN	Call	Done	Follow Up 11-14-05	Received bills from customer. Discussed with RSM, Bob Rose. Called and spoke to owner, Dan Tibbins. Goodwill to be issued for tire, rim and tow for wheel issue from 10-2004. Customer satisfied with resolution. No further action required. Issue resolved. Discussed with customer to check wheel torque with torque wrench at ever service and when reinstalling wheels. Maintain item. Customer says he has this done on a routine basis by a local tire company. Goodwill to be applied through local dealer.



DHT
Golf Services
8 Meadow Park Road
Plymouth, MA 02360

Specialists In
Golf Course Construction
And
Irrigation Installation

FAX COVER SHEET :

Date: 10-5-05

Faxed to : DEBBIE SMITH

At: VOLVO OF NORTH AMERICA

At fax #: (508) 393-2444

From: Jeff Roy

Fax # 508-746-3922

Phone # 508-746-3222 / TEM

Cell Phone # 617-799-7458 / TEMP CELL # 617 799-7763

Message: I SPOKE WITH SEAN WHO REFERRED ME TO
FAX THIS LETTER TO YOU. I GAVE SEAN ADDITIONAL INFO
TO THIS SITUATION. THANK YOU

No. of Pages including cover :





Office of Defects Investigation

VOQ Confirmation

Your Complaint Information is successfully submitted.

Your Confirmation number (ODI Number) is: 10137044

Your Complaint Information

Consumer Information

Name : [REDACTED]
 Org. Name : [REDACTED]
 Address : [REDACTED]
 City, State, Zip : Plymouth, MA 01960
 Country : USA
 Daytime Phone : [REDACTED] Ext : [REDACTED]
 Evening Phone : [REDACTED] Fax : [REDACTED]
 E-mail : [REDACTED]

Complaint Information

Describe : 1. A trade truck owned by [REDACTED] and manufactured by Volvo model VHD-64P was involved in three separate failures of the wheel studs which are part of the rear wheel hub assembly. The referenced truck was used on paved roadway hauling of sand, loam and aggregate material. All hauling was done with legal loads that were weighed on registered scales. 2. The three failures are described in sequence. a. The subject vehicle was on the side of the paved road and the studs failed. The owner Devin Tibbitt replaced the wheel hub, two rims and wheel seal. The studs that failed were on the left rear rear hub. b. The subject vehicle was travelling on a highway with a load and the right rear rear tire became detached from the truck at a speed of 35 mph. The two tires were recovered and it was apparent that the lugs were still tightened and the lugs had sheared from the hub. c. The subject vehicle was travelling on a secondary paved road with a load at a speed of 30 mph and again studs sheared from the hub. The left rear rear hub assembly was involved in this episode. Part number of Hub is Volvo part # 20478405 Right rear rear Volvo part # 20478407 Left rear rear 3. The following procedures were done to correct the lug failure. a. The old lugs were replaced also 2 rims, oil seal b. The old lugs were replaced, replaced hub 2 rims 2 times, shock and oil seal c. The old lugs were removed and replaced. The dealer is O'Connell based in Maine. Volvo was not contacted about incident #1. Volvo was contacted about incident #2 and a representative of Volvo compensated [REDACTED] for the cost of parts only, advising no structural failure occurred. Volvo was informed of incident #3 and Volvo has said that they have no liability in this incident. The part number of the failed lug is

Incident Date : 9/13/2005

Fire : No

Num. Failures : 3

Property Damage : No

9/21/2005

Num. Dealers : 0
 Num. Inquiries : 0
 Referral Source : INTERNET
 Crash : No
 Police Report : Yes

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Vehicle Information

VIN : 4VKS9GH14N [REDACTED] Purchase Date : 4/7/2004
 Manufacturer : VOLVO TRUCKS NORTH AMERICA, INC.
 Year, Make and Model : 2004/VOLVO/VHD Original Owner : Yes
 # of Cylinders : 6 Trans. Type : MANUAL
 Engine Size : VED12-465 HP Vehicle Details Usage : HEAVY TRUCK
 Cruise Control : Yes Antilock Brakes : Yes
 Current Mileage : 75520 Speed : 30
 Future Mileage : 76100 Powertrain : REAR WHEEL DRIVE
 Body Style : OTHER Fuel System : FUEL INJECTION
 Fuel Type : DIESEL Vehicle Type : TRUCK

Vehicle Component Information

Component : 21 WHEELS/LUGS/NUTS/BOLTS OEM : Yes

Vehicle Dealer Information

of Dealers : 1
 Name : O'Connor Volvo Dealer Type : SALES DEALER
 Address :

Dealer Phone :
 Dealer Fax :
 E-mail :

222

9/21/2005

Customer complaint

Service Request Activity

VPSS

SR Number : 1-8107107 Account Name : VOLVO & GMC TRUCKS OF PALM BEACH Priority : Medium
Date Opened : 6/2/2004 8:15:57AM Severity : 1-Critical Owner : WARNER
Date Closed : 6/7/2004 2:11:48PM Customer Ref. Id : Status : Closed
Serial No : 4V5KC9GF44N

Description :

Unit is in for third time with broken wheel studs. 1st time was LRR, 2nd time was RRR. Unit now in with LRR broken again. I advised him to verify that they have the correct P/N wheels and hubs.

SR Number : 1-42684710 Account Name : VOLVO & GMC TRUCKS OF PALM BEACH Priority : Medium
 Date Opened : 02/12/2004 1:34:41PM Severity : Owner : SPRADLIN
 Date Closed : 02/26/2004 2:34:41PM Customer Ref ID : Status : Closed
 Serial No : 4V5KC9GF44N

Description :

repeat rear axle wheel studs breaking

Activities

02/02/04 08:12:45AM	UT00145	REGISTERED CUSTOMER	Dealer Service Request	Acknowledged	PR Response	040902. Records show the vehicle has had four drive axle hub replacements not counting the latest repair at these hub positions: RRL; RRR; RRL again; RMID with a do over on the seal for the RRR. There are no details given in this report as to the latest repair position. Be sure proper calibrated torque tooling is available for use. Suggest the repair procedures sent to DSM Gabe Butschek be followed exactly including retorquing the wheels 100 miles after the hub replacement. Contact Alan Freigang, Dana Engineer at 289-687-1081 to have Dana review issue since these are CTI hubs. Get weigh sheets and forward to Spradlin @ Volvo. Ride with driver to verify duty cycle and whether vehicle used off road. Lastly send broken wheel studs and all related parts to TMAC Altn Spradlin.
02/02/04 09:10:35AM		SPRADLIN	Email - Outbound	Done	1-42684710	Hello Gabe, See the activity entered. Please share with dealer. Waman Spradlin 540-874-7384

Gabe Butschek
District Service Manager
Southeast Service Group
Palm Harbor, FL 34683
-----Original Message-----
From: Spradlin Warren
Sent: Friday, July 02, 2004 3:40 PM
To: Butschek Gabriel
Cc: Schlotmann Guenter; Curri Mark
Subject: SN353795
To: Gab Butschek

Inspection of L.R.R. hub, for M22 wheel stud breakage. Also inspected inner wheel bearing cup and cone and the outer bearing cup.

Observation:

1. Hub is Eaton 10 stud wheel with studs marked C 10.9 M. Hub cast marks 67335C and 01197 probably date code.
2. Some of the lettering cast into the stud heads were flattened as if hammered or dropped.
3. Six of the ten studs broken off nearly flush with hub flange. Three of ten had about three quarters of length and were also broken off. One stud appeared unbroken.
4. Stud showed fatigue type break with successive beach marks until stud breaks completely through.
5. Inner cone and rollers nearly perfect. Inner cup and race nearly perfect.
6. Outer cup race scored slightly.

Conclusion:

Weight sheets were not provided, nor were vehicle maintenance histories, however stud breakage observed is consistent with possible vehicle overload and hub having been operated or run loose. A run loose condition can result in stud breakage as this hub appears to indicate. You have been faxed a D8M letter with suggestions to avoid such issues. Spradlin

09/07/04 11:13:14AM	UT00145	REGISTERED CUSTOMER	Dealer Service Request	In Progress	Dana Eval Requested	040907. Jeff Duke, Dana Corp. has had example parts returned to Dana for metallurgical evaluation recently. I have requested Dana and Mr Duke provide copies of such their reports. Spradlin
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08/16/04 08:51:31AM	UT00145	REGISTERED CUSTOMER	Dealer Service Request	Done	Comment	040816. Suggestions made to DSM and dealer not followed believed to contribute to further occurrences of stud breakage. Specific suggestion was to press in wheel studs and followup within 100 miles of driving and retorque all studs to 475 +/- 25 ft lbs using the correct sequence. DSM reports this was not done. Spradlin
08/21/04 07:30:11AM	UT00145	REGISTERED CUSTOMER	Field Investigation	Done	040820Phonecon	0040820. Phoneconversation held between BobCrepas, Dana Service, Gabe Butschek and Warren Spradlin, VTNA, concerning repeat breakage of M22 wheel studs on one vehicle, SN383785. Studs from earlier occurrence were evaluated by Dana Metallurgical lab with no material fault found. The fault was identified as fatigue due to low torque and possible overload of vehicle. Bob Crepas has requested a copy of this report from the Dana Lab. A visit to the dealer and customer is planned for Thursday 040823 by Gabe and Jeff Duke, Dana. Also Crepas had a phonecon with John George earlier 040821. It was indicated Dana's previous advice after replacement of all 30 wheel studs, using a calibrated torque wrench to recheck the torque after operating the vehicle or daily was not followed. Continued breakage resulted. Spradlin
08/28/04 01:24:50PM	UT00145	REGISTERED CUSTOMER	Dealer Service Request	Done	DSM Visit FU	040828. During my telephone followup with the Volvo DSM who visited the customer and 53190 dealer on 040823, the following information was discussed: 1. All wheels were removed previously by the body builder bringing into question potential for improper wheel torque upon reinstallation. 2. Actual wheel torque measured by the DSM during visit showed wheel nuts had loosened by 1/2 flat. 3. The customer and dealer had not followed the recommendation to retorque the wheel nuts within 50 to 100 miles after replacement 040826. 4. DSM was shown wheel studs which had been manually hammered in to the hub. Information and suggestions supplied to use a stud press was not followed by the dealer. 5. Front tires are due replacement and DSM reports concern for lack of follow up torquing as recommended. 6. Dealer reported to have a low percentage of participation in dealer training. We discussed the benefits of training to improve maintenance practices. Maintenance and related suggestions need to be followed to provide a lasting solution to this issue. Therefore this SR is closed. W.Spradlin
08/29/04 01:55:05PM			Email - Outbound	Done	1-42864710	Hello Gabe, Please review the activity entered after our phonecall 040829. Basically I conclude the M22 wheelstud breakage experienced by the customer, MUS and dealer, 53190, is due to improper maintenance practices. I have therefore closed the SR. This is based upon your findings from your visit 040823, as well as previous evaluation of parts returned to TMAC and evaluated by me. Warren Spradlin

Complaint, Field Report

PSA Mod R-FILE	VPSS
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SR Number :	1-91411001	Account Name :	VOLVO & GBC TRUCKS OF PALM BEACH	Priority :	High
Date Opened :	9/24/2005 9:02:45AM	Severity :	E-Question	Owner :	
Date Closed :	11/11/2005 9:17:35AM	Customer Ref. Id :		Status :	Closed
Serial No :	4V5KC9GF44				

Description :

22577 VHD report problem with rear axle wheels and hubs. nuts not tightening correctly and customer has lost wheels from the rear axle. tech has replaced rims, hubs and studs and nuts. will pull prints and call rd back. 561-889-8006

Activities

Date	Time	User	Action	Status	Comments
09/28/05	02:33:32PM	UT01677	BURROW	Call	Done
				update	call to rd. according to prints the part #'s rd got are correct. asked tech to check thickness of surface area where rims meet. should .885 inches. then install wheels and torque to 400-500 ft/lbs of torque. tech has not been torquing rims, only using a air wrench. check the amount of stud sticking out per wheel nut. should be approx 1.75 inches. svr niger wants to take truck to be weighed, is loaded now. I will email DSM to get him involved.

Complaint

Service Request Activity

VPSS

SR Number : 1-106906805 Account Name : VOLVO & GMC TRUCKS OF PALM BEACH Priority : Medium
Date Opened : 3/21/2006 9:50:24AM Severity : 3-Medium Owner : 
Date Closed : 3/21/2006 9:58:32AM Customer Ref. Id : State : Closed
Serial No : 4V5KC9GF44 

Description :

 called on 3/21/06 to let me know his wheel broke off again on #963785 the night before. He states this is the 9th time and he just wants the truck fixed - whatever it takes and it does not matter how long it takes either. He says he does not want to go legal, but does not understand why Volvo can not fix this problem. I told him I would make sure the people involved would be let aware of the current developments on the unit, and that he would be contacted to make out a game plan to get resolved.

SR Number : 1-49844348 Account Name : HUDSON COUNTY MOTORS Priority : Medium
 Date Opened : 8/27/2004 1:37:11PM Severity : 3-Medium Owner :
 Date Closed : 7/12/2005 8:08:05AM Customer Ref. Id : Status : Closed
 Serial No : 4V5KB8GH85N

Description :

called in with a problem with his new Volvo VHD. As his driver was traveling along the NJ turnpike around exit 14 his air ducts fell off. The front ducts sheared off some lugs but didn't come off. The lug nuts on the left side of the tractor are loose because you can see a writer mark between the nut and wheel. wanted to speak to someone above me so I called Josh Yickie(VTS) involved in this case. Josh informed the customer that he would look into this Monday morning. main concern is how something would like this happen. The reason being, he wanted to pick the truck up from Hudson County but they wouldn't let it go before a PDI was performed. asked what the PDI consisted of in which he was given an example of making sure the truck was running ok, various items installed, lug nuts are torque to specifications. stated that his salesman Joe Brennan told him about the PDI. B & L towing was dispatched by to have the truck towed back to Hudson County. The dealer is closed over the week end so they will deliver the truck to them Monday morning. Paul also mentioned that the towing company had to tighten all the lug nuts to properly tow the unit safely to the dealer. It took about 6 hours to recovery the vehicle in which they have a bill of \$1225.00 so far.

wants Volvo to know that he's not comfortable with running this truck after this happened. He's losing \$800 per day that the unit is down for repairs. A 5 year contract was signed with a company in which he may lose if he doesn't have a truck to replace this ASAP.

Activities

09/27/04 01:40:52PM

Email - Outbound

Done

Assignment
Notification

The following service request has been assigned to you:

Service Request Number: 1-48544346

Date Opened : 9/27/2004 1:37:11 PM

Severity : 3-Medium

Priority : Medium

Product : VHD64F

Abstract : DIS 9/15/04

VAS

Warranty \$0

Description : [REDACTED] called in with a problem with his new Volvo VHD. As his driver was traveling along the NJ turnpike around exit 14 his 27 duets fell off. The r/r front duets sheered off some lugs but didn't come off. The lug nuts on the left side of the tractor are loose because you can see a water mark between the nut and wheel. [REDACTED] wanted to speak to someone above he so I called Josh Tickle(VTS) involved in this case. Josh informed the customer that he would look into this Monday morning. [REDACTED] main concern is how something would like this happen. The reason being, he wanted to pick the truck up from Hudson County but they wouldn't let it go before a PDI was performed. [REDACTED] asked what the PDI consisted of in which he was given an example of making sure the truck was running ok, various items installed, lug nuts are torque to specifications. [REDACTED] stated that his salesman Joe Breenza told him about the PDI. B & L towing was dispatched by [REDACTED] to have the truck towed back to Hudson County. The dealer is closed over the week and so they will deliver the truck to them Monday morning. [REDACTED] also mentioned that the towing company had to tighten all the lug nuts to properly tow the unit safely to the dealer. It took about 6 hours to rectify.

09/27/04 03:48:21PM UT0908A

Correspondence

In Progress

Customer contact

Spoke with customer on two occasions today. First call at 1:28 PM. Truck is still at towing facility. Reportedly, they cannot find the two wheels and tire and the brake drum yet, still somewhere on the (Jersey) turnpike. The towing facility told him the off drive wheels were loose as well. He insists that he will not accept the truck back. He wants a new truck and some compensation for what happened. I reiterated that I cannot get him a new truck, but can help get his fixed. It needs to go to the dealership for repairs. Discussed concern with Bob Rose. Same conclusion...we can do our best to get it up and running, but no buyback. I called the customer back at 3:45. I asked where the truck was. He advised that it is still at the towing facility. I restated the fact that I would be happy to do what I could to expedite the repairs, but it has to go to the dealer. He tone heated and explained that he doesn't want it repaired. He explained that it is now beyond me, and that he will be seeking legal counsel, Channel Seven News, etc. He abruptly hung up.

09/29/04 10:00:27AM UT0908A

Correspondence

In Progress

Dealer contact

Spoke with Steve at 51340 [REDACTED] (Vice President) went to towing company to look at truck. As previously reported, both of rear tires & wheels gone. Studs reportedly sheered off or missing. R/R drives reportedly loose. They feel it could possibly be deliberate(?) Reportedly [REDACTED] refused to let them repair the truck. He reportedly also told the owner of the towing facility not to talk to the dealership personnel. Paul spoke with the customer and he is adamant about not wanting the truck back.

09/29/04 05:10:27PM UT0908A		Correspondence	In Progress	Sent letter	Sent attached letter to customer via Priority/Certified mail. Tracking number 70031010000406727303
10/04/04 11:28:42AM UT0908A		Correspondence	In Progress	Customer contact	Customer called and left message in regards to the letter he reportedly hadn't received. (USPS tracking number 70031010000406727303) I called him back at 11:34 AM. He wanted to know the contents of the letter. I offered to fax it to him. He said that if it doesn't say anything more than we discussed last week, then he doesn't want a copy. He said he doesn't understand why we won't stand behind the truck. I said we are prepared to repair the truck. He repeated that he wants a new one.
10/04/04 02:42:35PM UT0908A		Correspondence	In Progress	Customer contact	Spoke with Steve at 51340 and customer (conf. call). Customer a little more receptive to repairing truck at this point, not pressuring for new one. He was getting irritated with Steve. We continued the conversation without him. Customer does not want truck to go to Hudson County Motors. His priorities include: --Replace rear drive axle assembly --Thoroughly inspect front drive, R/S --Replace ALL drive tires and wheel assemblies, including lift axle tires, due to perceived twisting and overloading of individual tires/wheels and flat spots. --Replace the rear suspension --Body damage repaired, incl. tool boxes. --Dash replaced due to CB tearing off when vehicle leaned severely. --Wants some sort of guarantee over the factory warranty, that will cover the rear end in case of "future problems" --Wants \$1,000/day downtime (\$1,207 per day income - \$180 in fuel and \$25 in tolls) for six days.
10/04/04 05:20:04PM UT0908A		Correspondence	In Progress	Customer contact	Spoke with customer again at 5:15. Explained that we need to get this truck to a dealership to check it out. He wants the demands in the last activity met before we take to a dealership. I advised that we cannot make any commitments until we look at the truck. He said we can look at the truck where it is now. I said no. Now he reports that his body hurts a little from the trauma. He hung up on me again.
10/06/04 01:52:22PM UT0908A		Correspondence	In Progress	Customer contact	Spoke with [REDACTED] at 1:45 PM. He was in contact with his insurance company (Great American [REDACTED]) that they referred to this concern as "a manufacturer's defect". [REDACTED] also says that they also claim that the truck depreciated due to the "accident". [REDACTED] also says that they claim that "he is due downtime for the extent of the repair". [REDACTED] also says that they claim that if it goes through them he will get it.
10/06/04 04:04:59PM UT0908A		Correspondence	In Progress	Customer contact	4:06 PM, advised customer to contact legal department at 226-883-2000.

10/12/04 05:24:30PM	UT0908A	RAVITSKY	Correspondence	In Progress	Customer contact	Spoke with customer at 2:12 this afternoon. He wanted to know what we are doing. I reiterated the letter sent to him and that the "ball is in his court". The recommendations remain as stated in the letter. He said he would call me back. At 4:12 PM we spoke again. He said he would take the truck to a shop in Elizabeth, NJ for "inspection". I mentioned that there are no Volvo dealers in Elizabeth, and that assuming this is a warrantable concern, a Volvo dealer would have to do the repairs. He said that he doesn't want it repaired, he wants a new truck and his downtime. I reiterated that I cannot do that, I can expedite getting the truck repaired. I mentioned that we are giving him the opportunity to get it fixed. He said: "I don't want to give you the opportunity to fix it". He then hung up.
10/13/04 04:37:48PM	UT0901B		Call	In Progress	Customer contact	Called customer after Bonny James told him yesterday that I would. Demands are the same. Friday 10/08/04, customer called me to let me know that he was going to the hospital for "quite a while" and that we would regret this whole thing. That it is going to be expensive. I told him that we were done and that his attorney should call ours. Today, he says he doesn't have an attorney and doesn't want it to go that way. Said again that he can't drive that truck again. Wants a new one plus downtime. Wants Volvo to "suck it up". Last conversation ended with: "you're not going to like what I'm going to do to someone over here." And he hung up.
10/18/04 06:56:52AM	UT0908A		Correspondence	In Progress	Customer & dealer contact	In a series of phone calls the afternoon of 10/16/04, I spoke with both the dealership (5134D) personnel and [REDACTED] Steve (5134D) who [REDACTED] now wants the truck fixed and said he talked to Paul Rypkema. I spoke with [REDACTED] at 3:15 PM. He said he wants the truck fixed, but doesn't want it back. He is willing to get it to the dealership to have it repaired, but wants them to give him fair market value for it on another vehicle. I again stated that I cannot do that, he must run that through his salesman.
10/29/04 07:40:17AM	UT0908A		Correspondence	In Progress	Dealer contact	Spoke with Steve at 5134D yesterday afternoon. He said [REDACTED] truck is going to Elizabeth Truck Center in Elizabeth, NJ. This is not a Volvo dealer. His parts department had received a call from this truck repair facility requesting wheel hardware. After inquiring, he was told that they are going to try to put wheels on it, then fix the truck to their facility.
11/02/04 05:23:16PM	UT0908A		Correspondence	In Progress	Sent second letter	Sent second letter certified mail at 3:04 PM. Tracking number is [REDACTED] See attachment entitled "Signed [REDACTED]"
11/09/04 10:41:24AM	UT0901B		Email		For the record	All emails filed electronically in Outlook (Legal).
01/25/06 06:00:33PM	UT0908A		Appointment			

01/25/05 08:01:28PM UT0908A

RAVITSKY

Correspondence

In Progress

Dealer contact

On 1/18/05, Neil Rypkema requested that I go to Elizabeth Truck Center to inspect this truck after the repairs were made. The repairing facility would like our "opinion" on how the wheel fits the hub. My response: Neil, I would be happy to verify any and all part numbers the repairing facility provide as being correct per the chassis build record. Any "inspections" of the vehicle listed would be performed at an authorized Volvo facility only. I cannot and will not condone or guarantee repairs made at any facility other than a Volvo dealer. I would be happy to verify the part numbers that were installed on this truck. If the parts are not Volvo sourced components, then I cannot proceed any further with this concern. Please provide me with the phone number of the repairing facility or have them fax me a copy of the invoice (or pre-invoice) so I can verify the part numbers. Thank you,

I called Steve Pasca at 908-355-8200 (Elizabeth Trk Ctr.) on 1/25/05. He wanted our opinion on the hub & stud fit. I advised that due to the circumstances all I could do was to verify the correct parts were installed by the part numbers provided. I also advised of retorquing lug nuts after run-in. He was to contact dealer so as to possibly look at another truck that was built the same way to verify his repair. The company that is paying for these repairs can stand behind them (Great American Insurance), as Volvo has no place in it. Parts replaced: R/S four wheels & tires, R/S hubs, R/S studs.

02/01/05 08:16:08PM UT0908A

Appointment

02/01/05 08:16:58PM UT0908A

Correspondence

In Progress

Customer contact

Paul Pizzuto called me this afternoon. I returned call at 6:18 PM. He wants me to come down to Elizabeth Truck Center and look at the job they did. I advised that I will not go to that facility, as it is not a Volvo authorized facility. I again offered to have the repairing facility fax me the parts that were used on this repair and I would verify that the correct part numbers were used as per build records. "They" feel as though the studs are incorrect for the wheels. They are to fax the parts lists.

02/07/05 11:29:21AM UT0908A

Correspondence

In Progress

Customer contact

Left message on Mr. Pizzuto's cell phone at 11:27 AM. I advised that "based on the information provided, the part numbers are correct per BOM, assuming the parts on the invoices are actually the parts installed". I advised him that if he wants any verification, he should call his local dealer and see if they would like to inspect it. I cannot go any further than that.

07/13/05 08:47:28AM UT0908A

Administration

Done

Closing case

On 6/6/05 I was called by Paul Rypkema at Hudson County Motors, 5134D. He had spoken to Mr. Pizzuto and reportedly, some drive wheels had loosened again. They were caught in time so as not to fall off. I advised him to have Mr. Pizzuto bring it to any Volvo dealer and I will go there and look at it. Mr. Pizzuto did not do that. I have followed up several times with Paul and during my visit to the dealer on 7/6/05. Mr. Pizzuto had not brought the truck in or called back.

September 29, 2004

[REDACTED]
Linden, New Jersey [REDACTED]

Subject: Accident Involving Serial Number 377148

Dear [REDACTED]

The purpose of this letter is to keep you advised of our investigation into your accident as well as to offer a proposal to allow you to continue generating revenue and fulfill your commitments under the recently obtained hauling contract of which you advised.

The circumstances under which the accident occurred and how it occurred are still unclear to us and it will be necessary to obtain additional information and clarification. This will take some time as a number of factors need to be considered and evaluated. Of course, we will need your assistance by making the truck available for inspection by our technical personnel. We encourage your and/or your representative(s) to participate in this inspection.

We are prepared to expedite repair of your truck and replace all damaged parts and put the truck in "as new" condition. The sooner this repair is made, the sooner you can return to generating revenue. We suggest this is the most expeditious manner in which to minimize any disruption in your business.

After we have obtained additional information through inspection, data collection and analysis, we will be in a position to address your other concerns. The loss of wheel equipment is an extremely infrequent event and is therefore of considerable concern. With your assistance we hope to identify the root cause and understand the failure mechanism.

If you have any questions, please feel to contact me at 610-746-6510, or Bob Rose at 410-939-2325. We hope to speak with you soon.

Yours truly,

Bob Ravitsky
District Service Manager – Northeast Region
610-746-6510
610-746-6511

SALES FAX: (732) 284-8808
CLAIMS TOLL FREE FAX: (877) 394-4784
CLAIMS FAX: (732) 815-2887
ADMIN FAX: (732) 815-2880
NO FAX: (732) 815-2886



TELEPHONE: (732) 815-2800
TOLL FREE: (800) 352-8642

UNIVERSAL UNDERWRITERS GROUP

REGIONAL OFFICE—100 Walnut Avenue, Suite 800 • Clark, New Jersey 07066

MEMBER COMPANIES

UNIVERSAL UNDERWRITERS INSURANCE COMPANY
UNIVERSAL UNDERWRITERS SERVICE CORPORATION
UNIVERSAL UNDERWRITERS ASSURANCE CORPORATION
UNIVERSAL UNDERWRITERS INSURANCE SERVICES OF TEXAS, INC.

UNIVERSAL UNDERWRITERS LIFE INSURANCE COMPANY
UNIVERSAL UNDERWRITERS OF TEXAS INSURANCE COMPANY
UNIVERSAL UNDERWRITERS INSURANCE SERVICES, INC.
UNIVERSAL UNDERWRITERS INSURANCE SERVICES OF ALABAMA, INC.

May 17, 2005

Volvo Trucks North America
730 Southbluff Drive
Westerville, OH 43081
Attn: Bob Ravitsky / District Service Manager

Sent via fax to (732) 815-2887

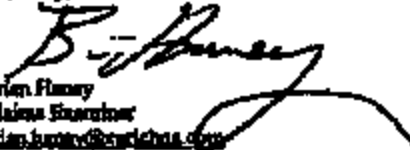
RE: Our Insured : [REDACTED]
Our Claim Number : [REDACTED]
Claimant : [REDACTED]
Vehicle : 2005 Volvo (377148)
Date of Loss : 9/25/04

Dear Mr. Ravitsky,

Enclosed please find a copy of subrogation proofs from Great American in the amount of \$31,832.20. Please advise in writing Volvo's position on this claim.

If you have any questions please feel free to contact the undersigned at 732-815-2887.

Sincerely,


Brian Flannery
Claims Examiner
brian.flannery@unichema.com

VOLVO

Volvo Trucks North America, Inc.

November 1, 2004

[REDACTED]
Linden, New Jersey [REDACTED]

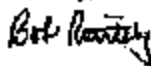
Subject: Accident Involving Serial Number 377148

Dear [REDACTED]

It has been one month since we offered to repair your truck provided you assisted in investigating the nature of the failure by making the truck available before any work was done to it. Unfortunately, we have not been given that opportunity.

We are concerned the passage of time and the possible involvement of third parties in regard to the repair of the truck will make any investigation meaningless. Under the circumstances, Volvo Trucks North America has no option but to withdraw its offer of resolution.

Yours truly,



Bob Ravitsky
District Service Manager - Northeast Region
610-746-6510
610-746-6511 fax

Service Request

VPSS

SR Number: 1-48838201

Account Name:

Priority: Very High

Date Opened: 02/27/2004 8:36:27AM

Severity: 1-Critical

Owner:

Date Closed: 10/7/2004 10:22:55AM

Customer Ref. Id:

Status: Closed

Serial No: 4V6K99GH65N

Description:

Hello,

called in with a problem with his new Volvo VHD. As his driver was traveling along the NJ turnpike around exit 14 his r/r duals fell off. The r/front duals sheared off some lugs but didn't come off. The lug nuts on the left side of the tractor are loose because you can see a wiper mark between the nut and wheel. wanted to speak to someone above me so I called (78) involved in this case. informed the customer that he would look into this Monday morning. main concern is how something would like this happen. The reason being, he wanted to pick the truck up from Hudson County but they wouldn't let it go before a PDI was performed. asked what the PDI consisted of in which he was given an example of making sure the truck was running ok, various items installed, lug nuts are torqued to specifications. stated that his salesman Joe Bresnize told him about the PDI. B & L towing was dispatched by to have the truck towed back to Hudson County. The dealer is closed over the week end so they will deliver the truck to them Monday morning. also mentioned that the towing company had to tighten all the lug nuts to properly tow the unit safely to the dealer. It took about 6 hours to recover the vehicle in which they have a bill of \$1225.00 so far.

wants Volvo to know that he's not comfortable with running this truck after this happened. He's losing \$800 per day that the unit is down for repairs. A 5 year contract was signed with a company in which he may lose if he doesn't have a truck to replace this ASAP.

Thanks

Jeffrey Gwin

Called tommy at dir (201-998-2716) tommy advised pdi was performed in august. tommy would look into this and call me back

Activities

09/27/04 08:05:29AM RU55373

Assessment

Done

Called Bob Ravitsky

Called bob ravitsky to make aware - for ref, ref was case 2004208413

Cust Phone #'s are as follows
home -
cell -

09/27/04 12:37:00PM RU55373

Call

Done

called dir in ref to cust calling in

called dir back due to customer calling in. cust states he has not heard from anyone until he called tommy at dir- cust states tommy was difficult to deal w/ and some angered... I called dir- steve is now handling situation-steve states he has not been in contact w/ dir as of yet... the truck is still at tow co and cust doesn't want unit taken to dir-I called cust - cust states he will not accept this truck under any circumstances - he will not let dir have unit until he has made pictures...

09/27/04 01:28:04PM RU55373

Call

Done

dsm follow up

bob called in - he is handling

09/29/04 10:48:05AM RU55373

Call

Done

Owner called in

(owner) called in requesting what he could do to get things going- he stated owner of dir had called him and only offered to repair the unit- paul in not satisfied w/ this and wants to take further action. I transferred him to helmo in legal - helmo was very hesitant to take his call after I explained the situation-

Service Request Activity (All)

VPSS

SR Number:	1-52008507	Account Name:	HUDSON COUNTY MOTORS	Priority:	Medium
Date Opened:	10/14/2004 8:04:57AM	Severity:	1-Critical	Owner:	
Date Closed:	10/14/2004 9:22:24AM	Customer Ref. Id:		Status:	Closed
Serial No:	4V5K99GH85N				

Description:

Dealer called to talk about a customer who had an accident. The customer's (reference other SRs) new truck lost wheels. They came off along with brake drums. Salesman and dealership owners visited truck and customer at the towing company. Found nuts and studs gone. Customer was angry and uncooperative.

*Property
Damage*

23 AM 11:11

GREAT AMERICAN.
INSURANCE GROUP

PO Box 4742
Chicago IL 60680-4742
Pft: (888) 745-8800
Fax: (513) 388-7124

TRUCKING PROGRAM

November 16, 2004

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Volvo Trucks North America, Inc.
PO Box 26115
Greensboro NC 27402-6115

RE: Insured: [REDACTED]
Claim Number: [REDACTED]
Vehicle: 2005 Volvo VIN 4V5K99GH65N [REDACTED]
Date of Loss: September 25, 2004

To Whom It May Concern:

Great American Insurance provides Physical Damage coverage for [REDACTED] on the 2005 Volvo he purchased at Hudson County Motors in September. While operating that vehicle on September 25, 2004, the right rear drive wheels and tires came off causing the right side of the truck to drop to the roadway.

The forensic mechanic, we had inspect the truck, has completed his investigation, and it appears the retaining lug nuts on both sets of the right side drive axle wheels were not properly torqued prior to sale and delivery of the vehicle to [REDACTED]. Upon payment of the loss, we will be looking to you, under the policy subrogation rights, for reimbursement of our claim.

Please forward this letter to your insurance carrier so that someone may contact us regarding our claim.

Sincerely,

Darrell W. Bickley
Darrell W. Bickley, CPCU
Trucking Division
Great American Insurance

Trucking Division
48 East Fourth Street
Suite 300 North
Cincinnati, OH 45202-3803
513.393.6998 fax

August 3, 2005

PO Box 6425
Cincinnati, OH 45201-5425
800.843.7882 toll-free

Volvo Trucks North America, Inc
P.O. Box 26115
Greensboro, NC 27402-6115

LEGAL DEPT.

AUG 22 2005


GREAT AMERICAN.
INSURANCE GROUP

Attention: Bob Ravitsky

RE: Our Insured: [REDACTED]
Claim No.: [REDACTED]
Date of Loss: 09-25-2004
Property Damage: \$13726.95

Dear Mr. Ravitsky:

Please be advised that Great American Insurance Company insures [REDACTED].
Our forensic mechanic investigation of this incident indicated that you are legally liable for the
damage to our insured's tractor.

The lug nuts on both sets of the right side drive axle wheels were improperly torque prior to the
sale and delivery of the vehicle to [REDACTED].

We have made payment to our insured in the amount of \$13,726.95 this amount is after our
insured's deductible of \$1,000.00; therefore we look for your prompt reimbursement in the
amount of \$14,726.95.

Please make your check payable to Great American Insurance Co. as subrogee of

[REDACTED] Mail your payment to: [REDACTED] Suite [REDACTED] Cincinnati, OH [REDACTED]

If you have any questions, please feel free to contact me directly. My telephone number is 800-
297-1971 x 16935.

Sincerely,



Robin Bressler
Trucking Claims Dept.

Trucking Division
49 East Fourth Street
Suite 500 North
Cincinnati, OH 45202-3803
513.333.8520 fax

October 20, 2005



PO Box 5425
Cincinnati, OH 45201-5425
800.297.1971 toll-free

Volvo Head Quarters
7900 National Service Road
Greensboro, NC 27409

Attn: Heno Schafs

RE: Our Insured: [REDACTED]
Claim No.: [REDACTED]
Date of Loss: 9-25-2004
Property Damage: \$13,726.95

LEGAL DEPT.
OCT 24 2005

Dear Sir or Madam:

We have been informed that you have been assigned this file to handle.

Our forensic mechanic investigation of this incident indicates that you are legally liable for the damage to our insured's tractor, as a result that the huge nuts on both sets of the right side drive axle wheels were improperly torque prior to the sale and delivery of the vehicle to [REDACTED]

Please issue payment to Great American Insurance Company a/s/c [REDACTED] and mail your payment to: [REDACTED] Suite [REDACTED] Cincinnati, OH [REDACTED]

Should you have any questions or wish to discuss this further, please feel free to call. My telephone number is 800-297-1971 ext 16935.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robin Bressler".

Robin Bressler
Trucking Department

Enclosure

Trucking Division
49 East Fourth Street
Suite 300 North
Cincinnati, OH 45202-3803
513.333.6006 fax

PO Box 5426 April 11, 2005
Cincinnati, OH 45201-5426
800.643.7682 toll-free



Volvo Trucks North America, Inc
P.O. Box 26115
Greensboro, NC 27402-6115

RE: Our Insured: [REDACTED]
Claim No.: [REDACTED]
Date of Loss: 9-25-2004
Property damages: \$13,726.95

Dear Sir or Madam:

Our insured purchased a 2005 Volvo, vin [REDACTED] at Hudson County Motors in September. While operating that vehicle on September 25, 2004 the right rear drive wheels and tires came off causing the right side of the truck to drop to the roadway.

Our forensic mechanic investigation has completed his investigation and it appears that you are liable for the damages to our insured's vehicle, as the lug nuts on both sets of the right side drive axle wheels were not properly torqued prior to the sale and delivery of the vehicle to [REDACTED]

We have made payment to our insured in the amount of \$13726.95. This figure is after the deduction of our insured's deductible of \$1,000. We therefore, look for you for prompt reimbursement in the amount of \$14726.95. This figure does not include loss wages & wrecker service that Great American paid for. See the attached for a total Breakdown.

Once you have reviewed the attached documentation, please advise us if you will be accepting our subrogation demand.

If you have any questions, please feel free to contact me directly. My telephone number is 877-877-6953.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robin Bressler".

Robin Bressler
Trucking Claims Department

Trucking Division
48 East Fourth Street
Suite 900 North
Cincinnati, OH 45202-3808
513.833.8998 fax

PO Box 5425
Cincinnati, OH 45201-5425
800.843.7882 toll-free



Property Damage, 2005 VOLVO, VIN 377478	13,728.96
Lost wages	5,250.00
Wrecker Services	11,855.25
Insured deductible reimbursement	<u>1,000.00</u>
total payment due Great American Insurance co.	31,832.20

INSURORS SERVICE BUREAU

Photos by John Barton

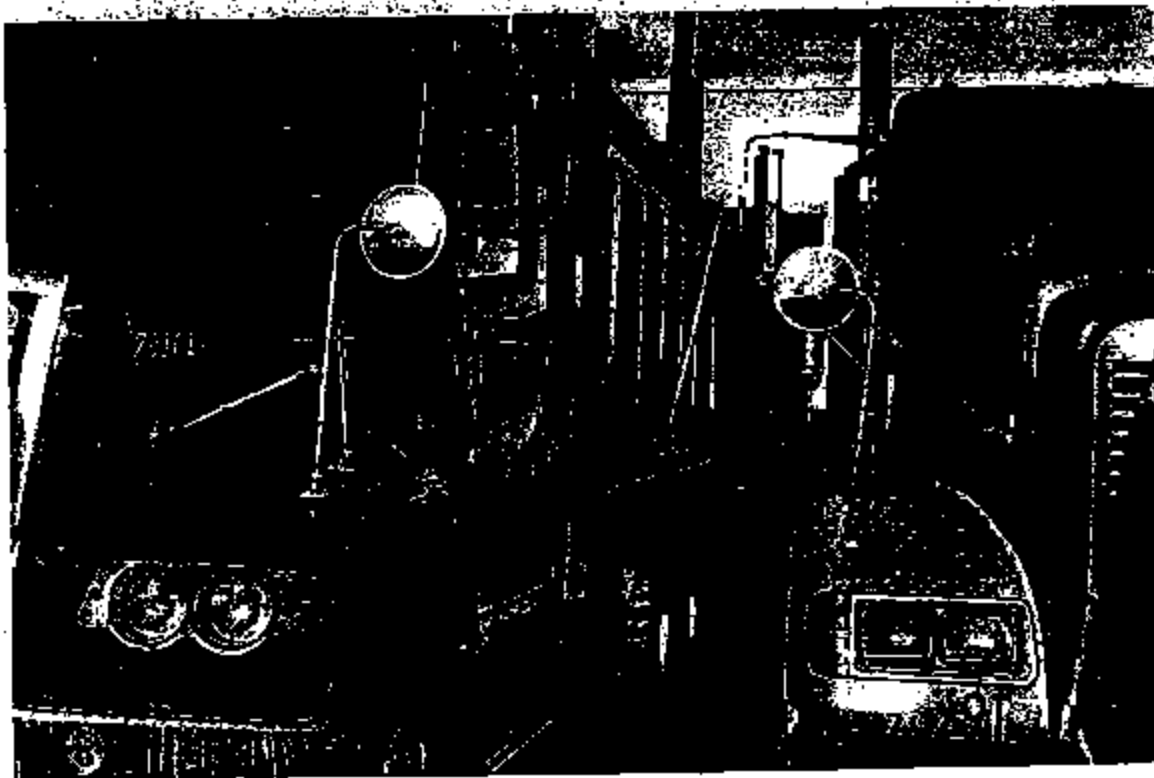
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2005 Volvo VHD

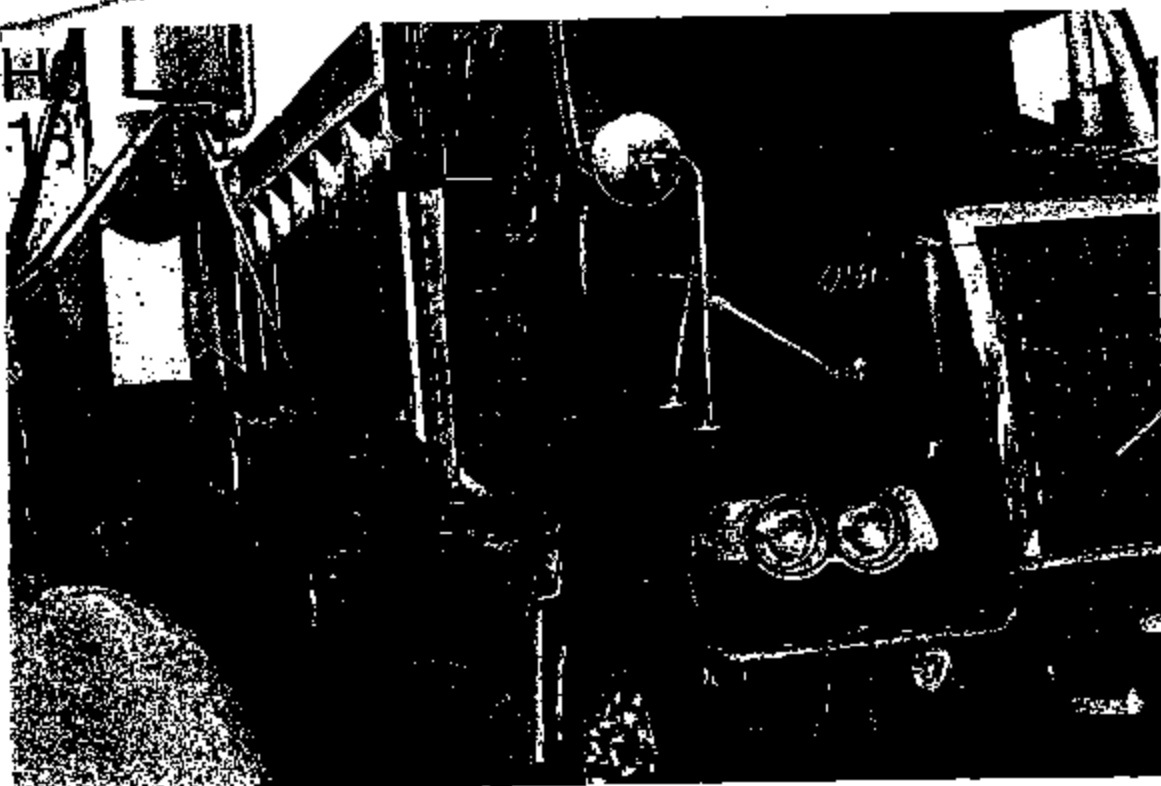
COMPANY:
Great American

DATE TAKEN:
11/1/04

FILE NO:
700513911

DATE OF LOSS:
9/25/04

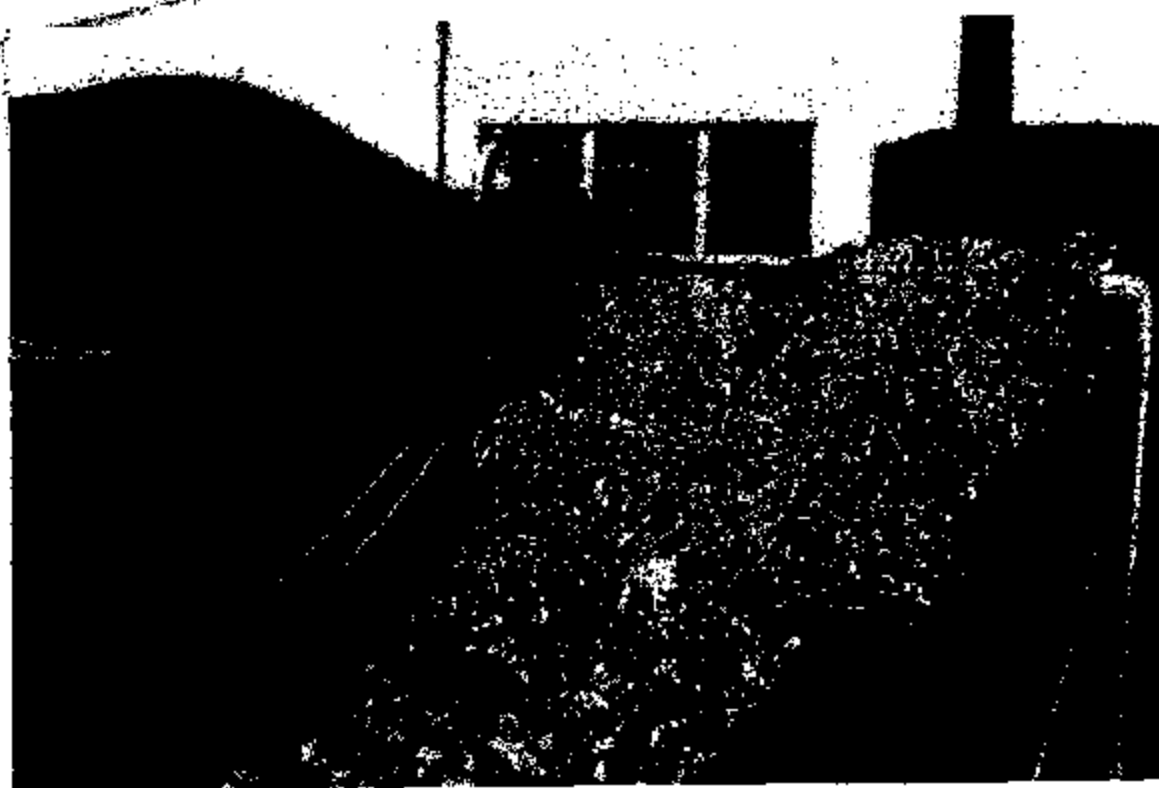




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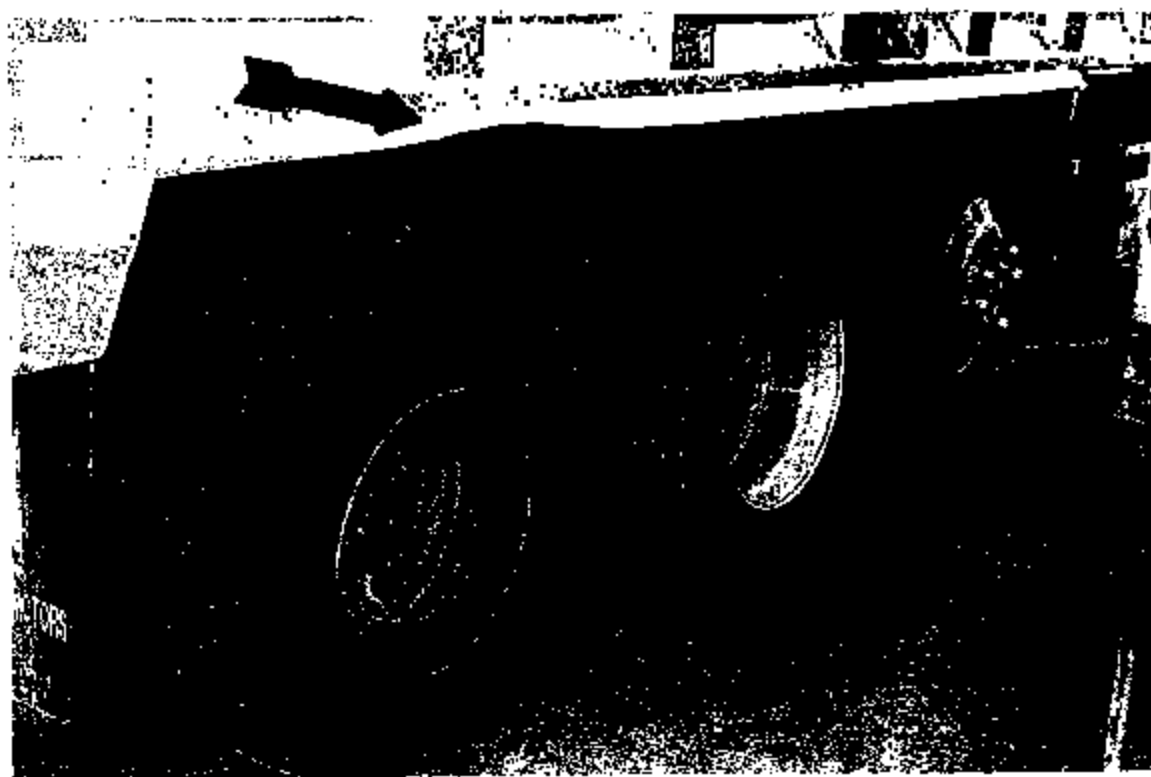
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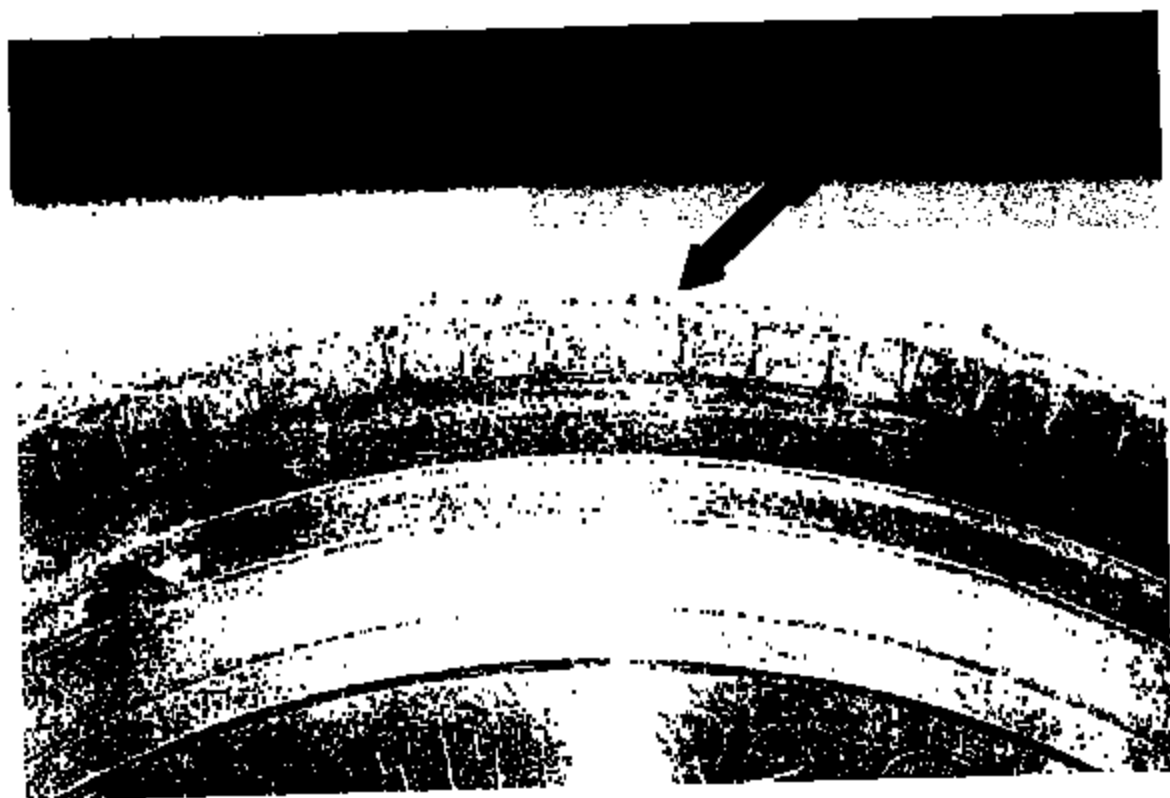
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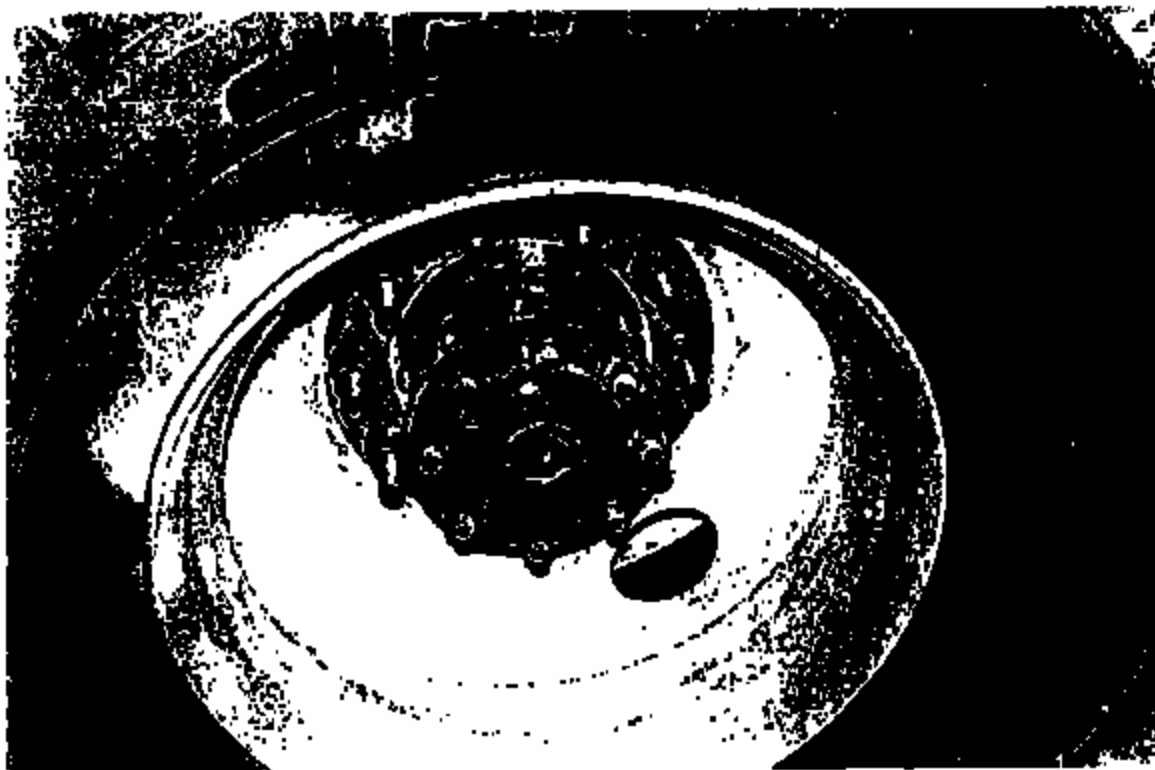
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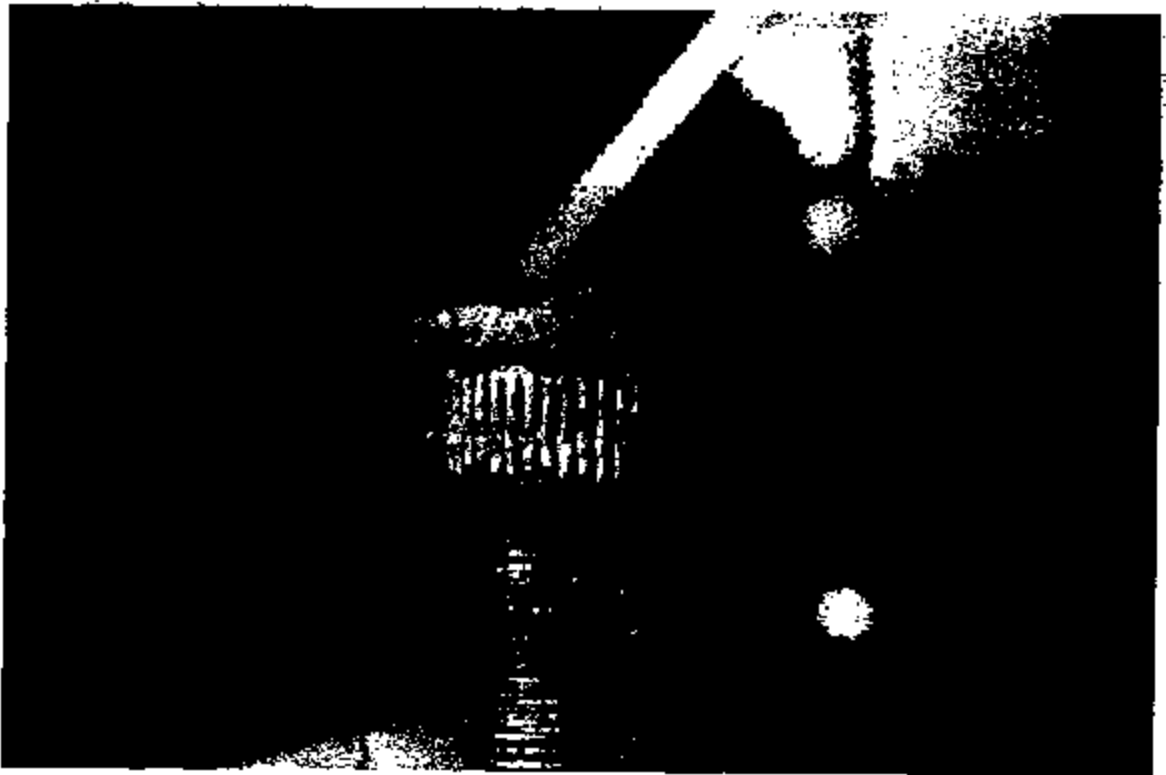
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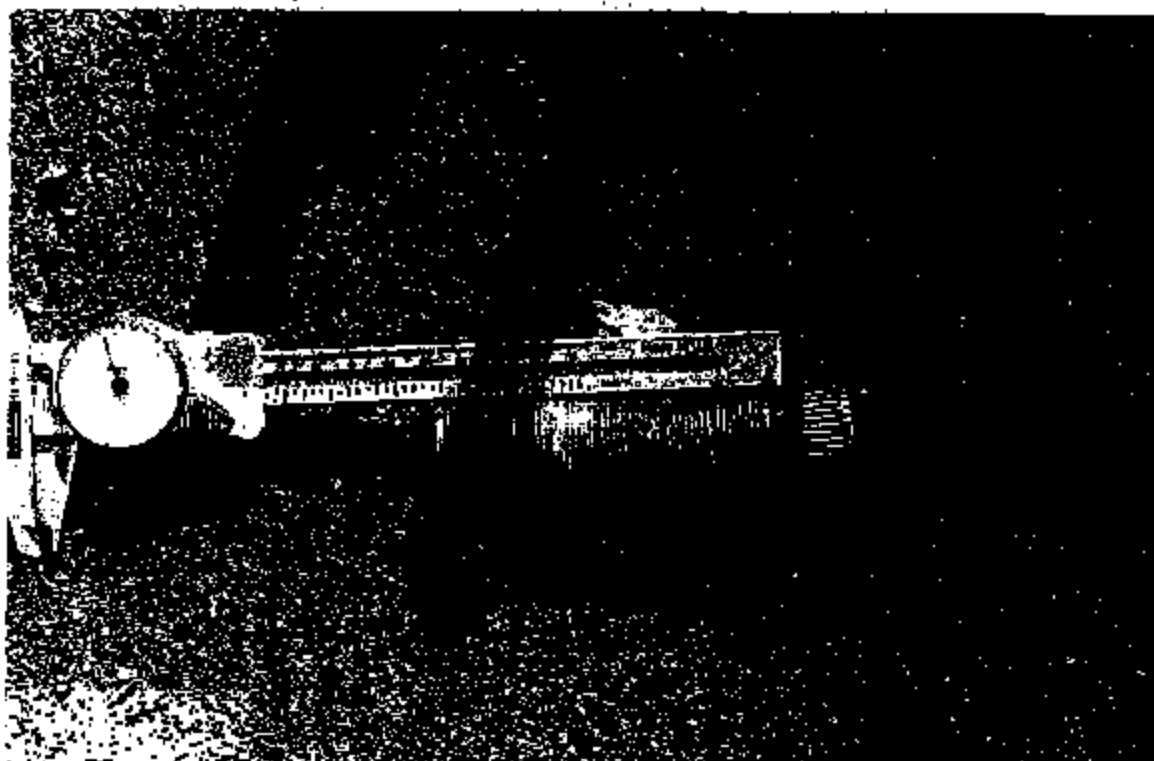
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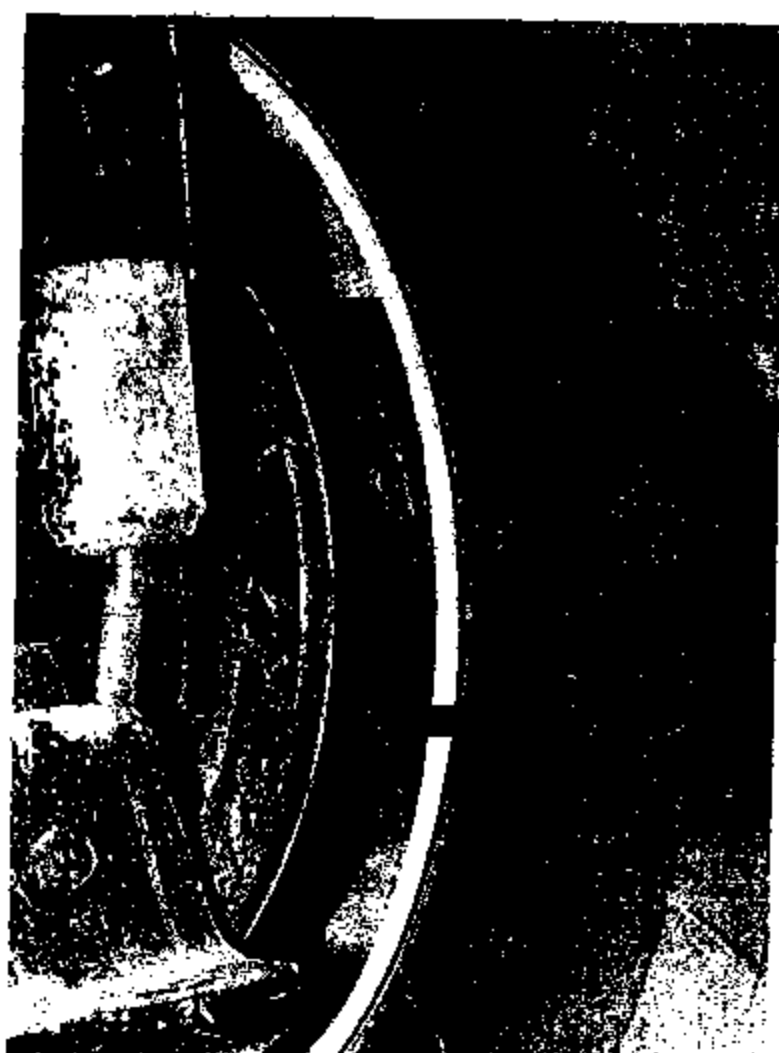
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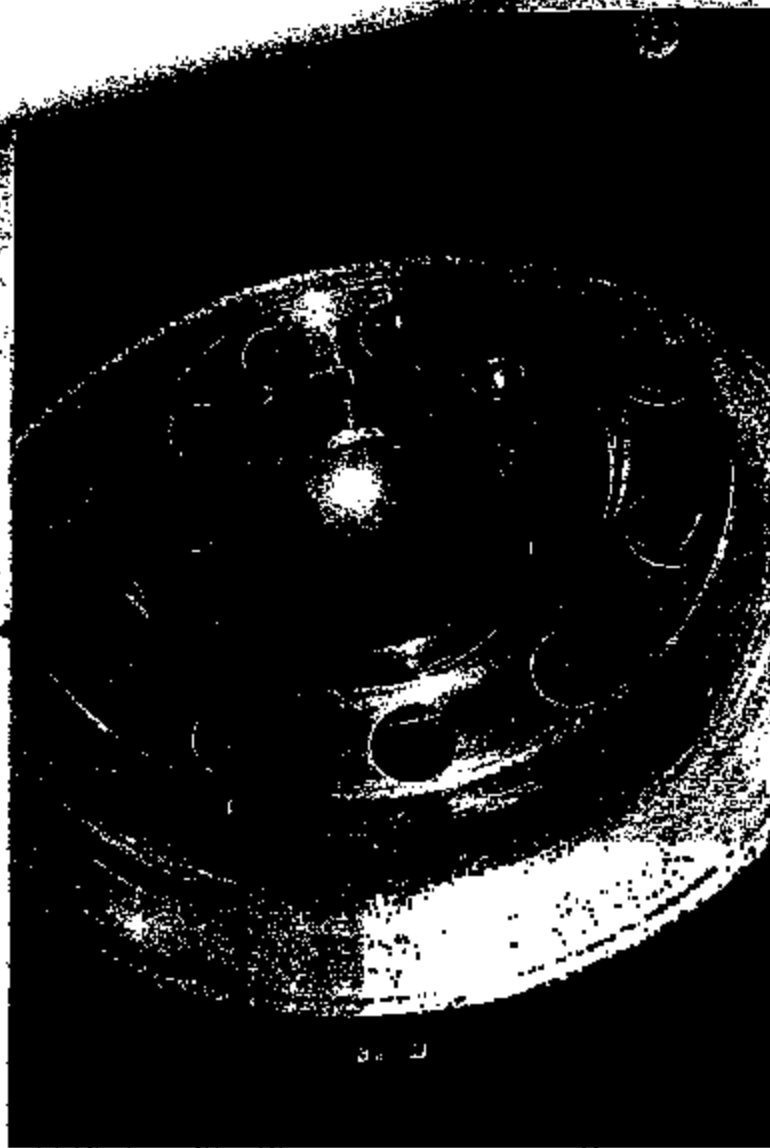
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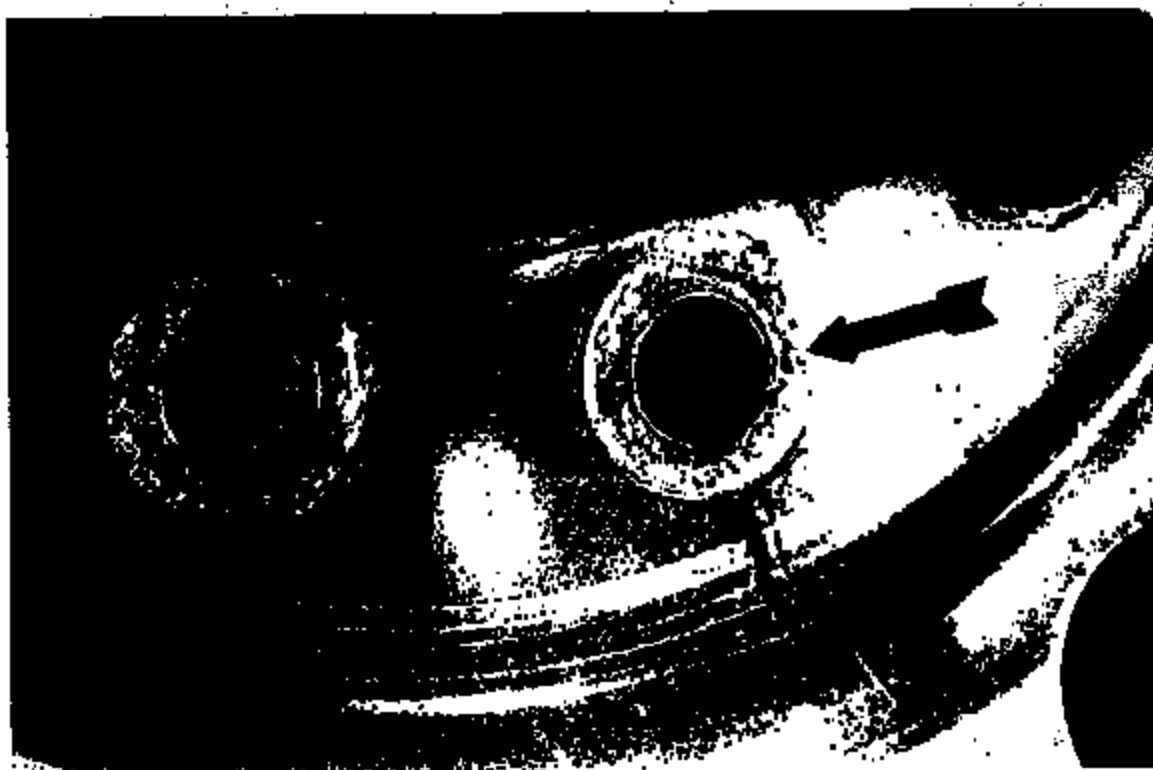
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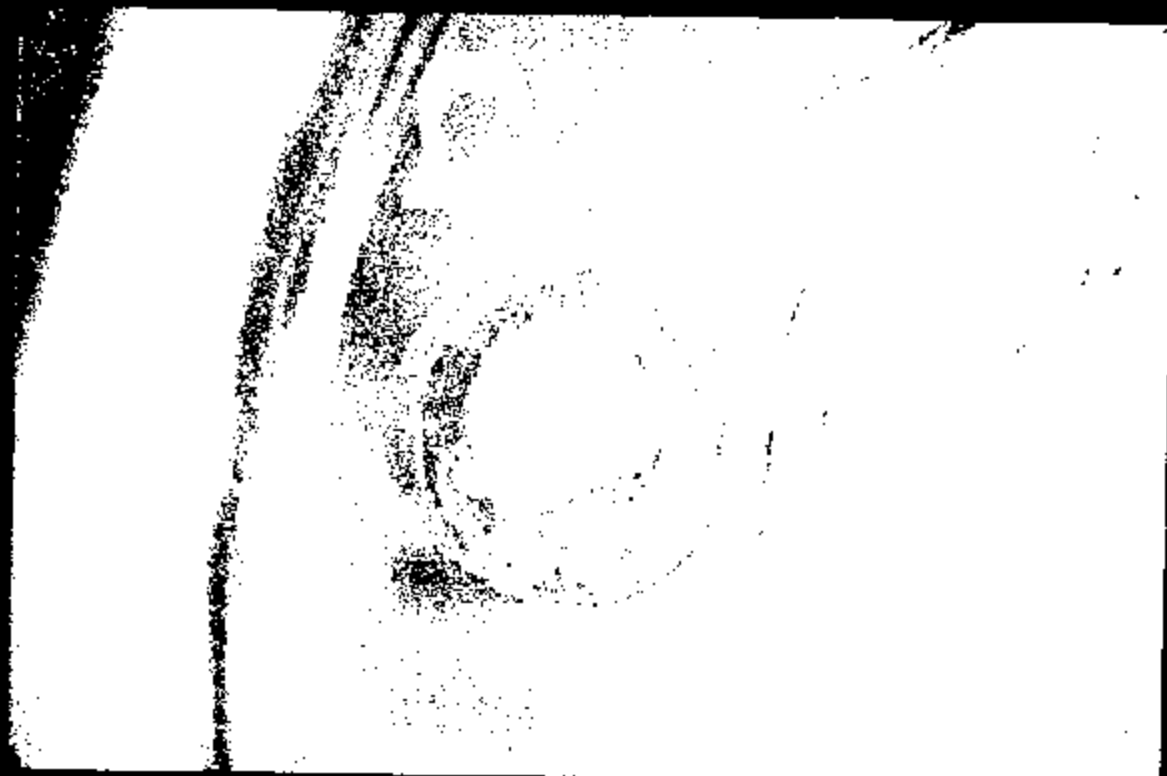
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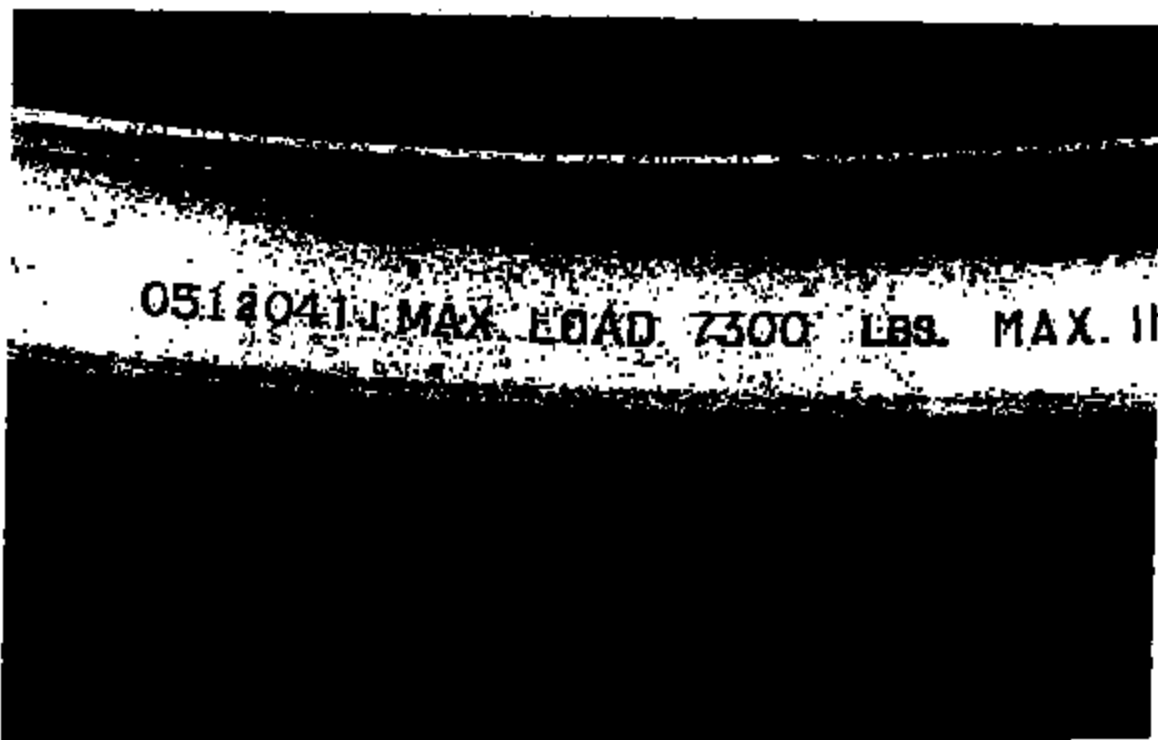
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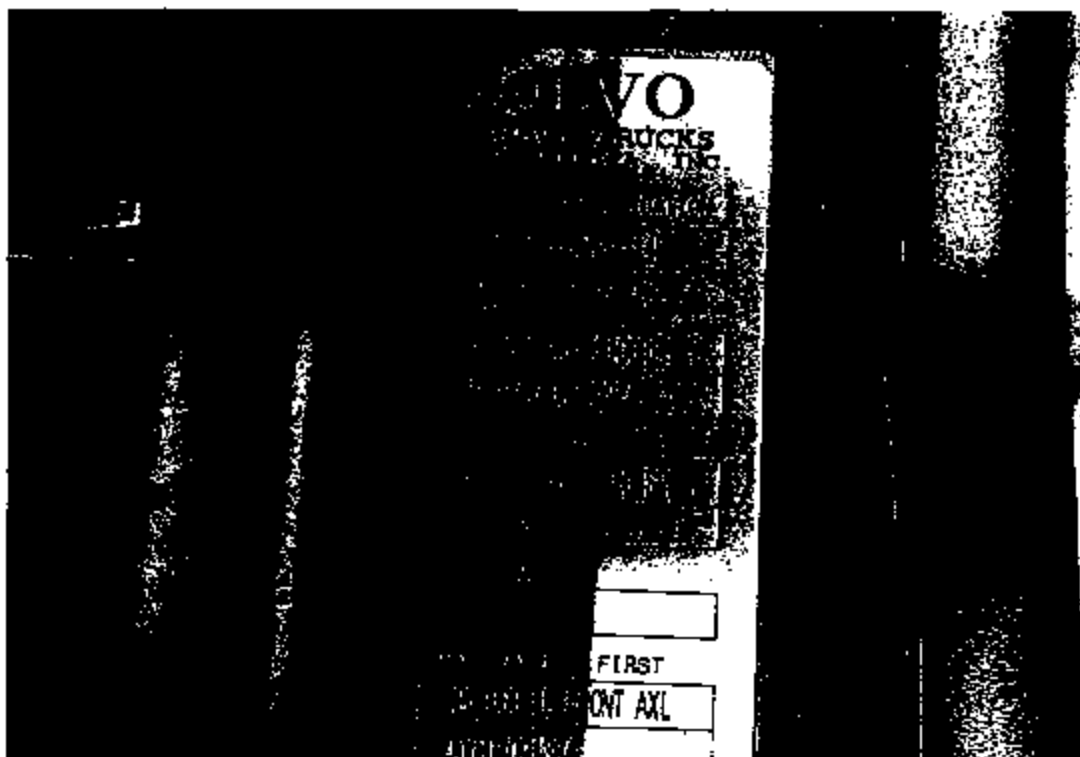
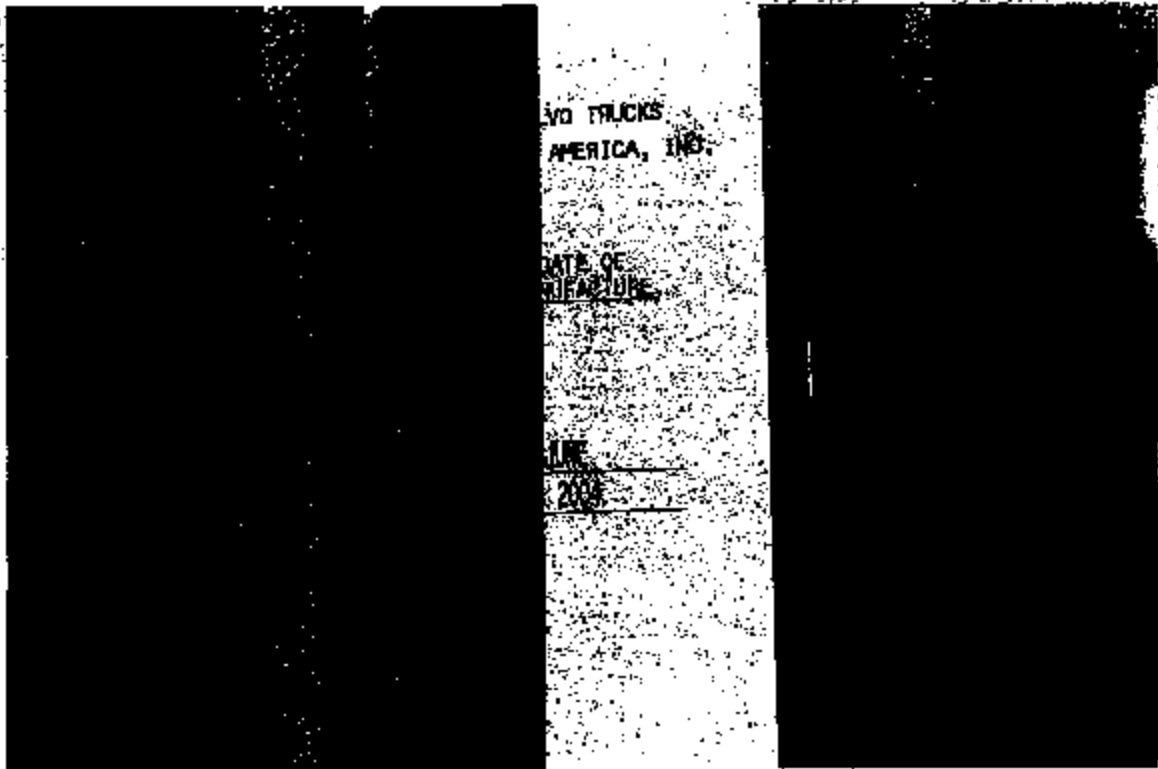


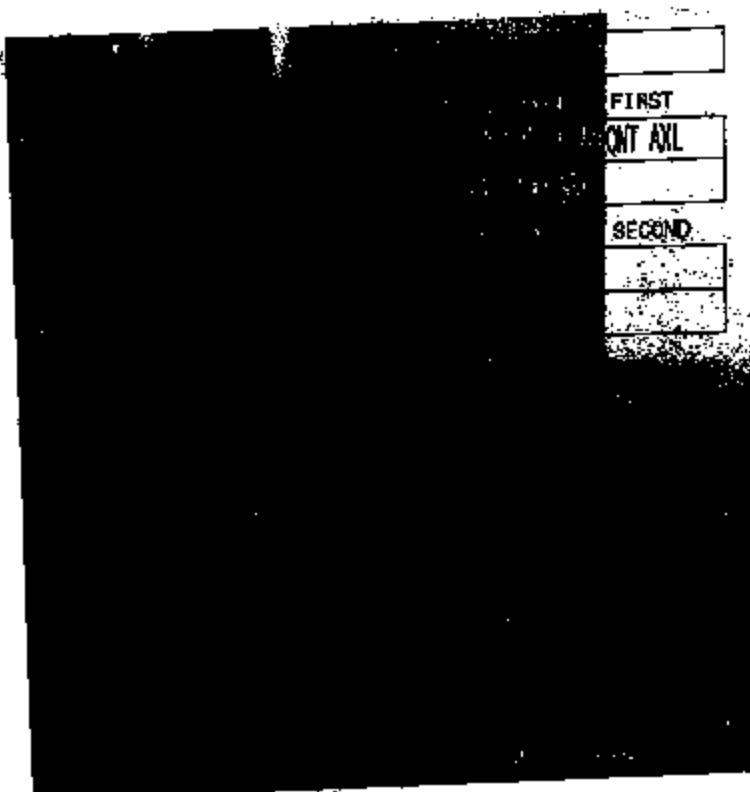


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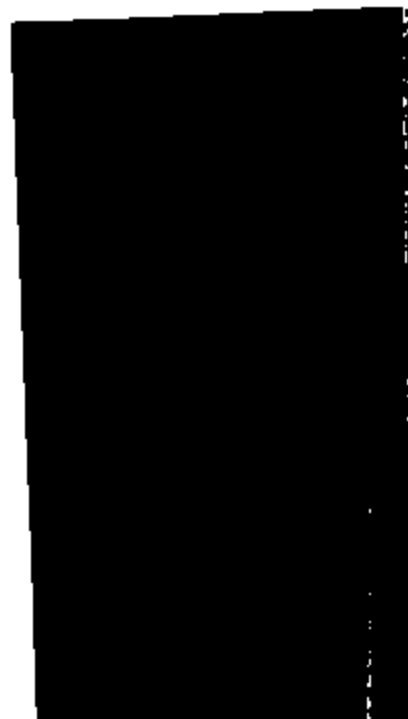




FIRST
FRONT AXLE
SECOND



37



WHEELS

REAR AXLE - FIRST
RT 48-160/184; RT 45-13
RVAD4133834

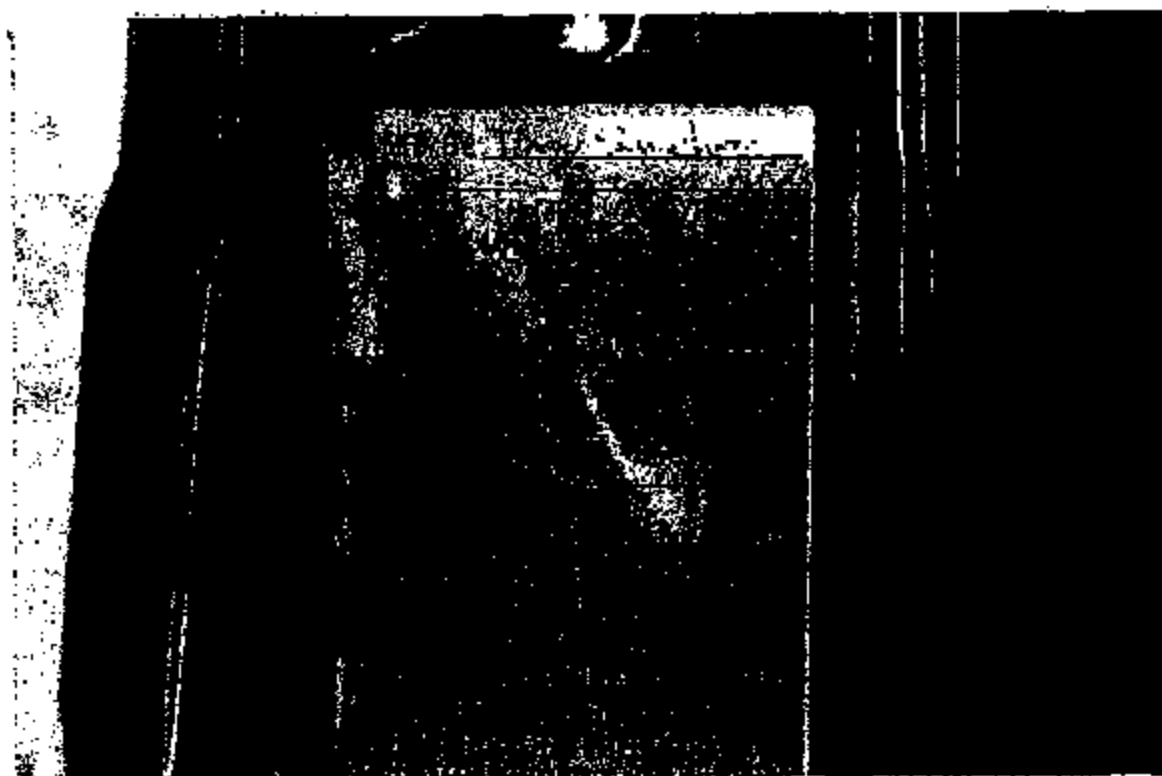
REAR AXLE - SECOND
RT 48-180/ 4.300
RVAD4133885

TAG AXLE

CAB PAINT
CONCORD BLUE MET
P3094 BL



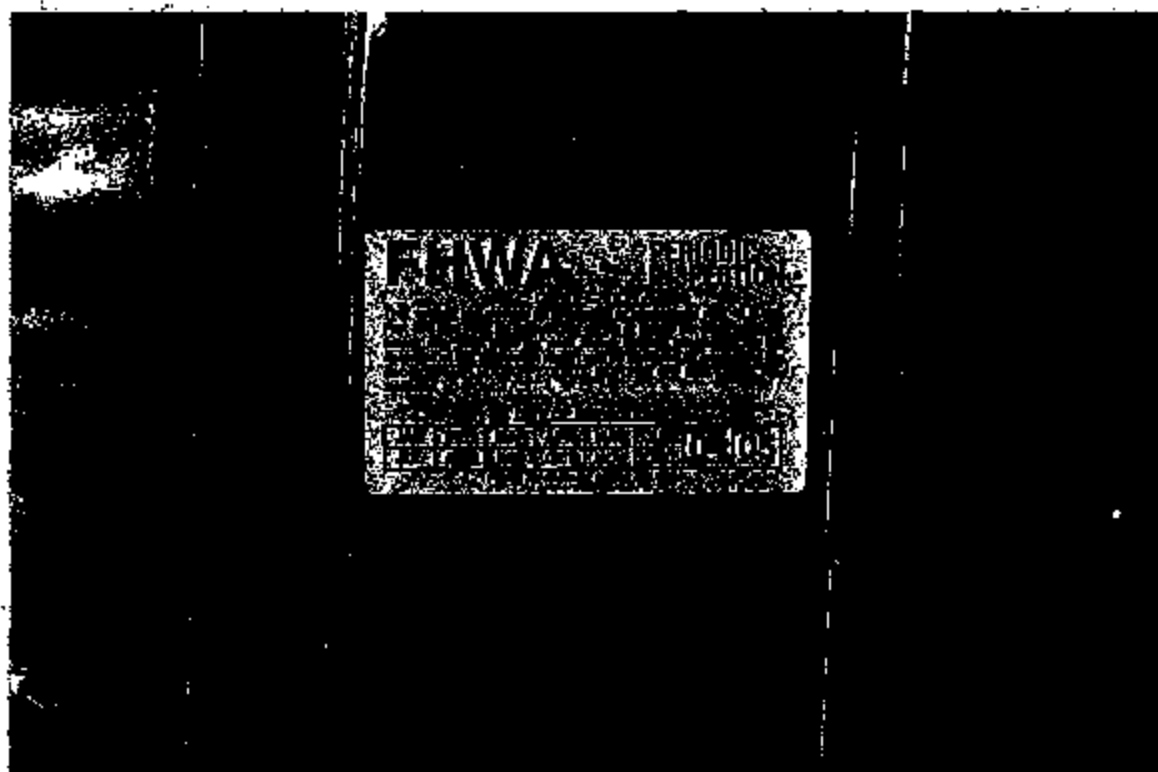
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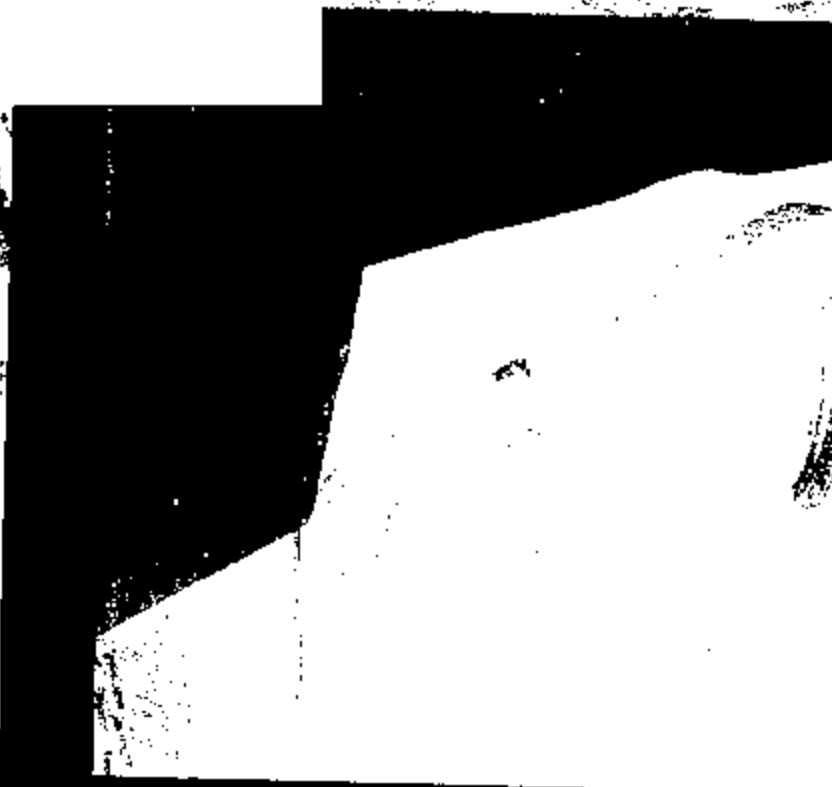
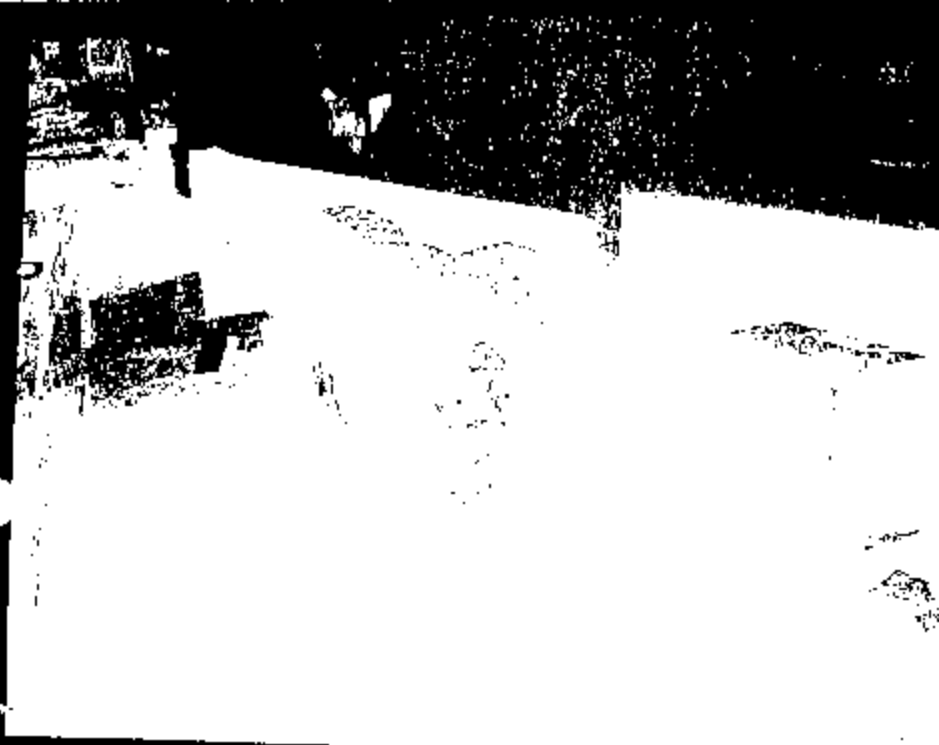


HUDSON COUNTY MOTORS

SECAUCUS, N.J.

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RECEIVED
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VOLVO CARS OF NORTH AMERICA
GENERAL COUNSEL

LAW OFFICES OF HOWARD A. GUTMAN

230 ROUTE 206, BUILDING 3, 2ND FLOOR

FLANDERS, NEW JERSEY 07838

(973) 598-1980 FAX (973) 209-4091

LEGAL DEPT.
DEC 20 2005

December 8, 2005

Rochelle Rebmann
Volvo Cars of North America, Inc.
Product Litigation Specialist
7 Volvo Drive
Rockleigh, New Jersey 07647

*Contacted by
insurance company.*

Re: [REDACTED] Volvo Cars of North America, Inc.
2005 Volvo Truck
VIN No. 4V5K99GH85N [REDACTED]

Dear Ms. Rebmann:

I represent [REDACTED] in the above captioned matter. My client purchased a 2005 Volvo Truck. The truck has been repaired for wheel loss on seven occasions which is believed to be an engineering defect in the hub, wheel or suspension system. My client has been greatly inconvenienced by these problems missing time from work and has lost over \$150,000 of down time as a result of the truck being out of service. Additionally, the truck is unsafe to drive. Kindly contact my office after reviewing the enclosed documents. Thank you.

Very truly yours,



Howard A. Gutman