

PE11-009

CHRYSLER

6-30-2011

Enclosure 2

Field Legal, Legal
Summaries - subject
vehicles PG

Field Reports – Subject
PG 18

PE11-009

CHRYSLER

6-30-2011

Enclosure 2

Field Reports - Subject

QNA - Quality Narrative Analyzer Detail Report

Dealer Product Sampling Report#: 413833020091

Vehicle Information

Repair Information

Dealer Information

VIN: 3D7UT2CL0AG [REDACTED]

Model Year: 2010

Make/Model: DODGE
RAM 2500 SLT CREW CAB 4X4
DJ7H92

Engine: ETJ-6.7L I6 Cummins Turbo Diesel Engine (Ser
#:F3139DF161)

Transmission: DG7-6-Spd Automatic 68RFE Transmissi (Ser
#:J316910103)

Plant: SALTILLO TRUCK ASSEMBLY PLANT

MDH: 112619

Report#: 413833020091

Open Date: 09/28/2010

Mileage: 19006

Warr Built Dt: 11/26/2009

Supplier RP:

Zone/Cd: 66-41383

Name: ORLANDO DODGE CHRYSLER JEEP

Address: 4101 W COLONIAL DR
ORLANDO, FL 328088122

Phone: 407 299-1120

Part Information

Part Number	Part Description	Quantity	Cost/Unit	Fail Cd	Retn Dt
68038054AC	PACKAGE -INNER END	1	88.13	N	01/01/0001

Labor Information

LOP	LOP Description	Cost	Fail Cd
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** No Labor Information Available

Service Narrative Information

Customer Comment:PER PHONE - CUSTOMER STATES THE LEFT BALL JOINT BROKE PER PHONE - CUSTOMER STATES THE LEFT BALL JOINT BROKE

Service Comment:LEFT TIE ROD SEPERATION LEFT TIE ROD SEPERATION

Service Action:REPLACE LF OUTER TIEROD END AND SET TOE TRUCK PULLS TO THE RIGHT - CUSTOMER DEREPLACE LF OUTER TIEROD END AND SET TOE TRUCK PULLS TO THE RIGHT -
CUSTOMER DE

QNA - Quality Narrative Analyzer Detail Report

Dealer Product Sampling Report#: 412613556381

Vehicle Information

Repair Information

Dealer Information

VIN: 3D7KS26D98G [REDACTED]
Model Year: 2008
Make/Model: DODGE
 RAM 2500 ST REG CAB 4X4
 DH7L62
Engine: EZA-5.7L V8 HEMI Engine (Ser #:6268710773)
Transmission: DGQ-5-Spd Automatic 545RFE Transmiss (Ser #:J250710759)
Plant: SALTILLO TRUCK ASSEMBLY PLANT
MDH: 110819

Report#: 412613556381
Open Date: 05/05/2010
Mileage: 9290
Warr Built Dt: 11/08/2007
Supplier RP:

Zone/Cd: 32-41261
Name: CORTESE CHRYSLER JEEP DODGE IN
Address: 2400 W HENRIETTA RD
 ROCHESTER, NY 146232324
Phone: 585 424-3000

Part Information

Part Number	Part Description	Quantity	Cost/Unit	Fail Cd	Retn Dt
52122362AE	STEERING -STEERING	1	509.03	N	01/01/0001

Labor Information

LOP	LOP Description	Cost	Fail Cd
** No Labor Information Available			

Service Narrative Information

Customer Comment:CUSTOMER STATES TIE ROD OR BALL JOINT BROKE

Service Comment:

Service Action:REPLACED STEERING KIT. (TIE ROD ENDS, DAMPER AND INNER SLEEVE.) RESET TOE

Field Engineer Analysis Report



Issue Number: WT7016SM [REDACTED]
 Business Group: PQRC Field Engineer
 Location: Phoenix
 Issue Type: Non-Powertrain
 Category: Reliability
 Reported By: Mirka, Steve
 Phone: +1 602 336 1529
 Created On: 11/24/2010

Images: 1



<u>Fam</u>	<u>VIN</u>	<u>Mileage</u>	<u>MDH</u>	<u>Dealer</u>	<u>Eng</u>	<u>Tran</u>	<u>Part Retn</u>
D2	AG [REDACTED]	15507	042706	08625	ETJF 1090 E8A1 D	DG7 J091 0100 20	

CONCERN #1
Customer Concern:

The vehicle wanders when driving down the freeway. There is approximately 5 to 10 degrees free play in the steering wheel when rotating it back and forth.

Root Cause:

The inner tie rod assembly, that fastens to the pitman arm, is worn. It moves up and down when turning the steering wheel side to side.

LABOR OPERATION: 19650101 Replace Inner tie rod assembly
 KEYWORDS: DesignIssue SupplierQuality PartReturn
 PARTS: 68036940AC Inner tie rod end assembly
 COST OF REPAIR: \$72.17(part only)

Field Engineer Analysis Report



CUSTOMER SATISFACTION: L20

Repair Action:

The inner tie rod end was replaced.

TSB Group: 19

Repair Successful: Y

Issue Number: WT7016SM [REDACTED]
Business Group: PQRC Field Engineer
Location: Phoenix
Issue Type: Non-Powertrain
Category: Reliability
Reported By: Mirka, Steve
Phone: +1 602 336 1529
Created On: 11/24/2010

Images: 1

<u>Fam</u>	<u>VIN</u>	<u>Mileage</u>	<u>MDH</u>	<u>Dealer</u>	<u>Eng</u>	<u>Tran</u>	<u>Part Retn</u>
D2	AG [REDACTED]	15507	042706	08625	ETJF 1090 E8A1 D	DG7 J091 0100 20	

Field Engineer Analysis Report



Part Information

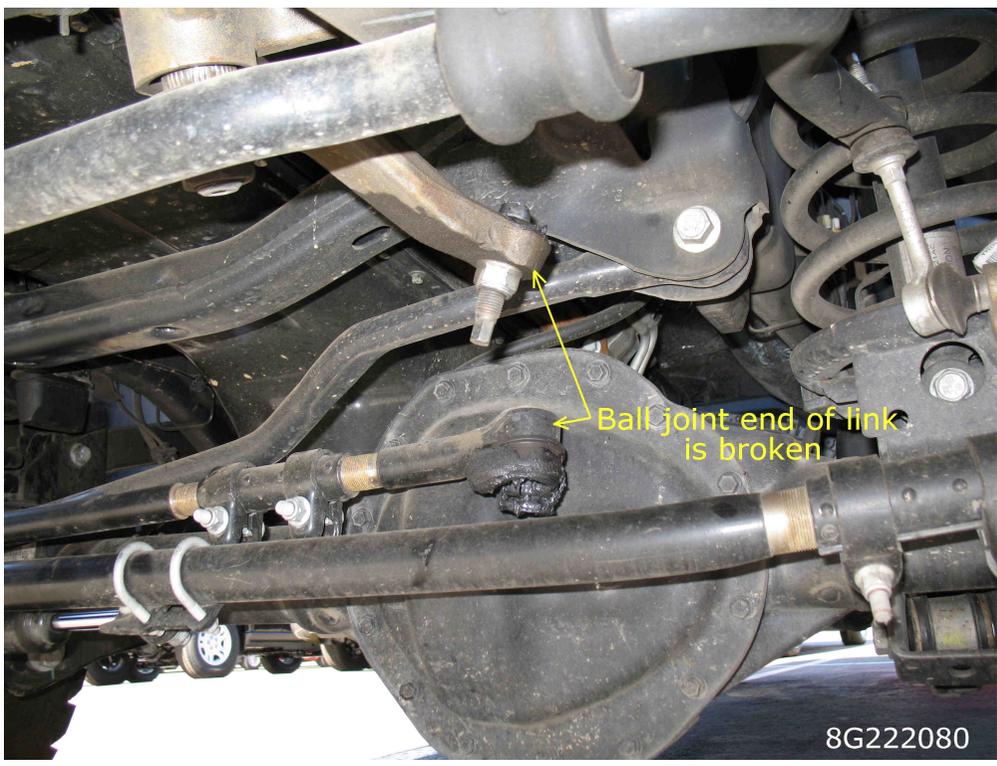
Part Number	Part Description	Quantity	Cost/Unit	Fail Cd	Retn Dt
68036940AC	PACKAGE -STEERING	1	0.00		01/01/0001
68036940AC	PACKAGE -STEERING	1	0.00		

Field Engineer Analysis Report



Issue Number: RT7016SM3230802
Business Group: PQRC Field Engineer
Location: Phoenix
Issue Type: Non-Powertrain
Category: Reliability
Reported By: Mirka, Steve
Phone: +1 602 336 1529
Created On: 11/18/2008

Images: 1



<u>Fam</u>	<u>VIN</u>	<u>Mileage</u>	<u>MDH</u>	<u>Dealer</u>	<u>Eng</u>	<u>Tran</u>	<u>Part Retn</u>
D1	8G [REDACTED]	20415	040706	08625	ETJF 0868 C85 C5	DG7 J085 8202 03	

CONCERN #1

Customer Concern:

The ball joint end, of the link that connects to the pitman arm, broke off this vehicle for the second time. The truck cannot be fixed, because the new replacement part from Mopar is on backorder at this time. The owner is upset that this failure has happened to his vehicle twice and also upset that he now has a delay in getting his truck fixed. He needs his truck for by Friday, November 21st for an upcoming towing trip he has scheduled.

Root Cause:

A link kit will not be available till the week of December 8th.

LABOR OPERATION: Not Applicable

KEYWORDS: DesignIssue MoparCatalog MoparAvailability

Field Engineer Analysis Report



PARTS: 68036940AC Link Kit
COST OF REPAIR: \$68.11(part only)
CUSTOMER SATISFACTION: Not Applicable

Issue Number: RT7016SM3230802
Business Group: PQRC Field Engineer
Location: Phoenix
Issue Type: Non-Powertrain
Category: Reliability
Reported By: Mirka, Steve
Phone: +1 602 336 1529
Created On: 11/18/2008

Images: 1

Repair Action:
None taken at this time.

TSB Group: 19 **Repair Successful: Y**

<u>Fam</u>	<u>VIN</u>	<u>Mileage</u>	<u>MDH</u>	<u>Dealer</u>	<u>Eng</u>	<u>Tran</u>	<u>Part Retn</u>
D1	8G [REDACTED]	20415	040706	08625	ETJF 0868 C85 C5	DG7 J085 8202 03	

Field Engineer Analysis Report

Narrative Information: Q1. How willing are you to recommend DODGE to a friend or colleague?

Score: 03 (Detractor)

007. Negative experience / problems with CURRENT vehicle

012. Negative/rude treatment by dealer's service employees

992. Safety/Legal

I had an issue with my new Dodge. I brought it in there. I felt I was disrespected by the general manager there. What happened was the steering, the part that makes the steering turn broke on my car which is a freak thing. If that would have happened, I live in Park City Utah, if that happened going down 80 which is a highway with a lot of cliffs I would have died. I have an eight year old daughter that was in the car when it broke on me. Anyway I towed it in there. I had it in there. They couldn't give me an explanation for it, except possibly I hit a curb and that would have broke it. I have a heavy duty truck that I take very good care of. This is my fifth Dodge in a row that I've bought from Larry Miller. I have been a very loyal customer. The general manager Phil I thought was very rude and very disrespectful to me when I told him my concerns about the vehicle.

Q2. Please rate your satisfaction with your RAM 2500 SLT CREW CAB 4X4 on a scale of 0 to 10.

Score: 03 (Detractor)

Z13. Any mention of dealership Service experience After SALE

D46. Other Steering System/Steering Wheels problems

992. Safety/Legal

Well because of what happened I mean obviously that still was all within the last couple of weeks... This would be the last Chrysler I would ever buy I promise you that, last Dodge I buy because of what happened. Again this is my fifth Dodge in a row. I have been a very loyal customer. I take very good care of my vehicles and my whole... I own a business. Everybody in my business drives a Dodge that I recommend or bought for them. Again the respect level that I got after I spent \$100s of \$100,000s on vehicles was poor to awful. That is it. That is the bottom line.

Q3. Please rate your satisfaction with your experience at LARRY H MILLER CHRYSLER JEEP on a scale of 0 to 10.

Score: 09 (Promoter)

Q14. Do you want someone from Chrysler LLC to contact you?

01 - Yes

001. Legal

SURVEY COMPLETED 2011-02-27 12:35:05, CUSTOMER ID:703247721, RO:00212458, CONTACT METHOD:PHONE, SPEAKING TO NAME FROM SAMPLE, LANGUAGE:00

Field Engineer Analysis Report

QNA - Quality Narrative Analyzer Detail Report Customer Promoter Score Report#: AG14617304

Vehicle Information

Repair Information

Dealer Information

VIN: 3D7UT2CL6AG [REDACTED]

Report#: AG14617304

Zone/Cd: 35-60134

Model Year: 2010

Open Date: 01/17/2011

Name: REEDMAN TOLL AUTO WORLD

Make/Model: DODGE

Mileage: 0

Address: 1700 E LINCOLN HWY

RAM 2500 SLT CREW CAB 4X4

Warr Built Dt: 01/20/2010

LANGHORNE, PA 190473042

DJ7H92

Supplier RP:

Phone: 215 757-4961

Engine: ETJ-6.7L I6 Cummins Turbo Diesel Engine (Ser #:F0130E393B)

Transmission: DG7-6-Spd Automatic 68RFE Transmissi (Ser #:J011020084)

Plant: SALTILLO TRUCK ASSEMBLY PLANT

MDH: 012014

Part Information

Part Number	Part Description	Quantity	Cost/Unit	Fail Cd	Retn Dt
52122362AF	STEERING -STEERING	1	294.00	X	01/01/0001
CH52122362-AF	STEERING -STEERING	1	294.00		

Labor Information

LOP	LOP Description	Cost	Fail Cd
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** No Labor Information Available

CPS Narrative Information

Narrative Information: Q1. How willing are you to recommend DODGE to a friend or colleague?

Score: 08 (Neutral)

Q2. Please rate your satisfaction with your RAM 2500 SLT CREW CAB 4X4 on a scale of 0 to 10.

Score: 05 (Detractor)

Field Engineer Analysis Report

D99. Other Driving Experience

Z13. Any mention of dealership Service experience After SALE

I had a tire rod break when I was backing out of a parking spot. It was towed to the dealership on 12/27. The dealership claimed that I hit something. They charged me \$637 to completely replace the steering linkage at my expense. I had to fight with them to get my money refunded to me which should've been covered under warranty.

Q3. Please rate your satisfaction with your experience at REEDMAN TOLL AUTO WORLD on a scale of 0 to 10.

Score: 00 (Detractor)

001. Negative/rude treatment by staff

017. Quality of service work performed

I had to explain to the service manager how the part had failed after I had requested the park back. I took the time to clean the grease out of the part. You can tell how it had been wearing abnormally before the break. They just assumed that I hit something and it broke. They never took the time to investigate how this situation came about. They completely just blamed it on me. That is why I'm completely dissatisfied with them. It took several trips for me to go up there to get my money back.

Q14. Do you want someone from Chrysler LLC to contact you?

01 - Yes

002. Dealer

SURVEY COMPLETED 2011-01-17 17:19:28, CUSTOMER ID:712380081, RO:00045251, CONTACT METHOD:PHONE, SPEAKING TO NAME FROM SAMPLE, LANGUAGE:00

Field Engineer Analysis Report

QNA - Quality Narrative Analyzer Detail Report Customer Promoter Score Report#: 9G54095703

Vehicle Information

Repair Information

Dealer Information

VIN: 3D7KS29L99G [REDACTED]

Report#: 9G54095703

Zone/Cd: 70-45471

Model Year: 2009

Open Date: 09/16/2010

Name: LARRY H. MILLER CHRYSLER JEEP

Make/Model: DODGE

Mileage: 0

Address: 5212 FREEWAY PARK DR

RAM 2500 SLT MEGA CAB 4X4

Warr Built Dt: 02/19/2009

RIVERDALE, UT 844054063

DH7H81

Supplier RP:

Phone: 801 728-2100

Engine: ETJ-6.7L I6 Cummins Turbo Diesel Engine (Ser #:F0429D7A92)

Transmission: DEG-6-Speed Manual G56 Transmission (Ser #:Z163834188)

Plant: SALTILLO TRUCK ASSEMBLY PLANT

MDH: 021906

Part Information

Part Number	Part Description	Quantity	Cost/Unit	Fail Cd	Retn Dt
68036940AC	PACKAGE -STEERING	1	72.17	X	01/01/0001
68036940AC	PACKAGE -STEERING	1	72.17		

Labor Information

LOP	LOP Description	Cost	Fail Cd
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** No Labor Information Available

CPS Narrative Information

Narrative Information: Q1. How willing are you to recommend DODGE to a friend or colleague?

Score: 05 (Detractor)

007. Negative experience / problems with CURRENT vehicle

I just kind of had not the best experience so far with it. I had Dodges in the past family owned. They're great and just good competition out there.

Field Engineer Analysis Report

Q2. Please rate your satisfaction with your RAM 2500 SLT MEGA CAB 4X4 on a scale of 0 to 10.

Score: 08 (Neutral)

Q3. Please rate your satisfaction with your experience at LARRY H. MILLER CHRYSLER JEEP on a scale of 0 to 10.

Score: 04 (Detractor)

007. Price/cost

The first thing is my truck was under warranty. I had problems with the front and driving down the freeway. It started doing some shaking. Took it in and they looked at it. They replaced a part up under there that they said was loose. In order to replace that I had to pay for an alignment a \$70 alignment that they said Dodge doesn't cover. The alignment is a maintenance procedure. I just didn't really agree with that. My truck was under warranty. It was a malfunction probably from the factory that I had to get fixed in the front place. I still had to pay \$70 to get it aligned after they made the repairs. I just thought something like that would be covered under warranty.

Q14. Do you want someone from Chrysler LLC to contact you?

01 - Yes

002. Dealer

SURVEY COMPLETED 2010-09-23 18:54:22, CUSTOMER ID:109022142, RO:00008746, CONTACT METHOD:PHONE, SPEAKING TO NAME FROM SAMPLE, LANGUAGE:00

Field Engineer Analysis Report

QNA - Quality Narrative Analyzer Detail Report Customer Promoter Score Report#: 8G21057603

Vehicle Information

VIN: 3D7KS28A48G [REDACTED]
Model Year: 2008
Make/Model: DODGE
 RAM 2500 SLT QUAD CAB 4X4
 DH7H41
Engine: ETJ-6.7L I6 Cummins Turbo Diesel Engine (Ser #:F0668C6AF1)
Transmission: DG7-6-Spd Automatic 68RFE Transmissi (Ser #:J052820304)
Plant: SALTILLO TRUCK ASSEMBLY PLANT
MDH: 031310

Repair Information

Report#: 8G21057603
Open Date: 02/11/2009
Mileage: 0
Warr Built Dt: 03/13/2008
Supplier RP:

Dealer Information

Zone/Cd: 63-44001
Name: DON DAVIS CHRYSLER DODGE
Address: 214 WEST HWY 332
 LAKE JACKSON, TX 77566
Phone: 409 292-0009
 979 292-0009

Part Information

Part Number	Part Description	Quantity	Cost/Unit	Fail Cd	Retn Dt
12345636		12	0.00		
3DS		1	59.95		
5083285AA	FILTER -ENGINE OIL	1	0.00		
68038054AB	PACKAGE -INNER END	0	102.00		
52013798AB	ARM -LOWER CONTROL	0	151.00		
52122362AE	STEERING -STEERING	1	234.03		

Labor Information

LOP	LOP Description	Cost	Fail Cd
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** No Labor Information Available

CPS Narrative Information

Narrative Information: Q1. How willing are you to recommend DODGE to a friend or colleague?

Field Engineer Analysis Report

Score: 08 (Neutral)

Q2. Please rate your satisfaction with your RAM 2500 SLT QUAD CAB 4X4 on a scale of 0 to 10.

Score: 05 (Detractor)

D25. Steering System-Too Much Play/Loose

E31. Check Engine Light Indicated Problem

P99. Unspecified Other Problems

It's just breaking down and it's brand new. The problem I had, the reason I had it over there at J*** D****, it was pretty serious. Something on my steering system broke and it could have killed me had I been on the highway. My check engine light is always on, a few other problems that I can't think of right off the top of my head now.

Q3. Please rate your satisfaction with your experience at DON DAVIS CHRYSLER DODGE on a scale of 0 to 10.

Score: 10 (Promoter)

Q7. Would you be interested in leaving dealer a message?

02 - No

SURVEY COMPLETED 2009-02-11 18:34:34, CUSTOMER ID:709053651, RO:00079969, CONTACT METHOD:PHONE, SPEAKING TO NAME FROM SAMPLE

PE11-009

CHRYSLER

6-30-2011

Enclosure 2

Field Legal, Legal
Summaries - subject
vehicles

PE11-009

CHRYSLER

6/30/2011

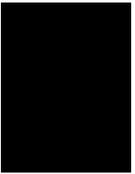
Enclosure 2 - Field

Data, Field Legal,

Herington Police

Report PG  39

Slivka Complaint

PG  41

MATTER # 1218615
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 20292836
DATE OF INCIDENT 12/28/2010
DATE OF NOTICE 01/05/2011
MODEL/MODEL YEAR 2009 Dodge Ram 3500 Laramie Quad Cab 4x4
VIN 3D7MX38L29G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 41,430
OWNER [REDACTED]
COURT Tahoe City, CA [REDACTED]
DOCKET # None
ALLEGED DEFECT Suspension: Tie Rods / Drag Links: Broke
DESCRIPTION The driver stated that he was driving on Highway 80; it was snowing heavily and the road was snow-covered and slippery. Driver said he suddenly heard a rubbing noise and pulled off the road. Driver exited his vehicle and found that the left tire had gone flat and that the outer tie rod had punctured the inside of the tire/wheel as a result of the tie rod stud separating.
CRASH No
PROPERTY DAMAGE No
INJURIES 0
FATALITIES 0
ANALYSIS Inspection revealed¹ that the left front outer tie rod stud separated nearly flush with the socket. The left front tire was deflated. The remaining section of the stud was still secure in the spindle housing with the hex nut secure. There was a 1.5" diameter hole in the inner circle of the left alloy wheel. There was no evidence of impact discovered on any tire, wheel or suspension component or left front wheel liner. There was extremely minor impact scuffing at the left front bumper corner. The owner explained this was pre-existing damage.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER # 1219472
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 20413016
DATE OF INCIDENT 2/10/2011
DATE OF NOTICE 2/14/2011
MODEL/MODEL YEAR 2008 Dodge Ram 2500 Mega Cab 4x4
VIN 3D7KS29A68G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 65,300
OWNER [REDACTED]
COURT Austin, AR [REDACTED]
DOCKET # None
ALLEGED DEFECT Suspension: Tie Rods / Drag Links: Broke
DESCRIPTION Owner stated that on 2/10/11 he was driving about 35 mph when he heard a pop and a grinding sound and the truck pulled. He stopped and out of the truck and found that the left wheel was turned and back against the wheel well. The dealer replaced the tie rod under warranty. On 02/17/2011, owner was driving on a highway at 70-75 mph and hit a bump. The truck started shaking. When he pulled off and stopped, he found the steering dampener was hanging down. The truck was towed to a dealer where the vehicle was repaired.
CRASH No
PROPERTY DAMAGE No
INJURIES 0
FATALITIES 0
ANALYSIS The vehicle's tie rod was repaired prior to inspection. A later inspection revealed¹ there was an improper bolt on the right end of the dampener and the low tire warning light was illuminated.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1207128
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	19061108
DATE OF INCIDENT	10/28/2009
DATE OF NOTICE	11/02/2009
MODEL/MODEL YEAR	2008 Dodge Ram 2500 Slit Quad Cab 4x4
VIN	3D7KS28A78G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	15,000
OWNER	[REDACTED] Eagle, CO [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Steering: Linkage: Broke
DESCRIPTION	Customer said the steering drag link fell apart. He struck a road sign with one of his side mirrors. No other vehicle damage.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	No inspection. Dealer had already performed repair to vehicle under Recall H36.

MATTER #	1213654
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	19575513
DATE OF INCIDENT	05/24/2010
DATE OF NOTICE	05/24/2010
MODEL/MODEL YEAR	2008 Dodge Ram 3500 Laramie 4x4
VIN	3D7MX38A58G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	64,000
OWNER	[REDACTED] Winthrop, WA [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	None
DESCRIPTION	On 5/24/10, owner contacted Chrysler claiming the steering rod fell out and he ran into a fence and into a ditch. Owner called Chrysler again on 7/7/10 saying he was upset because he went to have his tie rods replaced and after the repair had been completed and he heard a clicking noise and took the vehicle to his mechanic. He stated that his mechanic informed him that his U-Joints were worn and needed replacement.
CRASH	Yes
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	Inspection on 6/22/2010 revealed ¹ that the suspension had already been repaired. The windshield was cracked. There were minor scratches on the vehicle.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1210980
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	19358904
DATE OF INCIDENT	03/01/2010
DATE OF NOTICE	03/02/2010
MODEL/MODEL YEAR	2008 Dodge Ram 2500 Slit Quad Cab 4x4
VIN	3D7KS28D08G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	41,336
OWNER	[REDACTED] Reeders, PA [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Steering: Linkage: Broke
DESCRIPTION	Owner alleges she was traveling 20-25 mph when she lost all control of steering and the vehicle. The vehicle veered hard to the left, which caused her to hit a curb. Stated she lost steering prior to hitting a curb, not as a result of hitting the curb.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	Inspection revealed ¹ the right side tie rod socket and ball separated and completely void of any lubricant. Right front wheel impact damage noted on the outboard side.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1219127
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	20370076
DATE OF INCIDENT	01/20/2011
DATE OF NOTICE	01/20/2011
MODEL/MODEL YEAR	2008 Dodge Ram 2500 Slit Quad Cab 4x4
VIN	3D7KS28AX8G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	55,128
OWNER	[REDACTED] Phelps, WI [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Steering: Linkage:
DESCRIPTION	Owner stated that he was making a right hand turn and as he was turning something broke and the truck continued to veer off to the right and hit a snow bank. He said that he was not going very fast so he did not do any damage to his truck. He said that a bolt broke on the steering linkage causing the steering not to respond. He said that when the tires went to the right the inside of the right front tire was cut and punctured by a bolt.
CRASH	No
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	Inspection revealed ¹ that the vehicle's steering linkage had already been repaired.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER # 1203590
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 18708382
DATE OF INCIDENT 06/25/2009
DATE OF NOTICE 6/29/2009
MODEL/MODEL YEAR 2008 Dodge Ram 3500 Slit Quad Cab 4x4
VIN 3D7MX48AX8G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 55,408
OWNER [REDACTED]
COURT Troup, TX [REDACTED]
DOCKET # None
ALLEGED DEFECT Steering: Tie Rod
DESCRIPTION Owner stated her son was driving the truck when the tie rods broke causing the vehicle to spin out of control run through a fence.
CRASH Yes
PROPERTY DAMAGE Yes
INJURIES 0
FATALITIES 0
ANALYSIS Inspection revealed¹ the outer tie rod likely separated due to lack of grease. The tie rod on the vehicle was equipped with a grease fitting to lube the joint and is considered to be routine maintenance. Damage was found to be due to a lack of proper maintenance.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER # 1197863
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 18054488
DATE OF INCIDENT 10/31/2008
DATE OF NOTICE 11/04/2008
MODEL/MODEL YEAR 2008 Dodge Ram 2500 Slit Quad Cab 4x4
VIN 3D7KS28D98G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 8,057
OWNER [REDACTED]
COURT Dillard, GA [REDACTED]
DOCKET # None
ALLEGED DEFECT Suspension: Control Arm/Ball Joints: Broke:
DESCRIPTION Owner stated he was driving on asphalt pavement at about 40 MPH. Owner said he had just started to take a curve, starting to turn left, and the steering just got "real easy." He slammed on the brakes. The vehicle went over an embankment and went through a barbed wire fence and into a pasture. Driver did not hit anything other than the fence and took down four fence posts. The vehicle was left at the scene and towed to the dealer the next day. Dealer reported that the vehicle was towed in with a broken left tie rod.
CRASH Yes
PROPERTY DAMAGE Yes
INJURIES 0
FATALITIES 0
ANALYSIS Inspection revealed¹ the vehicle had a lift kit and the suspension had been modified post-sale.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER # 1198404
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 18107962
DATE OF INCIDENT 11/18/2008
DATE OF NOTICE 11/21/2008
MODEL/MODEL YEAR 2008 Dodge Ram 2500 Slit Quad Cab 4x4
VIN 3D7KS28A38G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 24,496
OWNER [REDACTED]
COURT CINCINNATI, OH [REDACTED]
DOCKET # None
ALLEGED DEFECT Steering: Linkage: Broke:
DESCRIPTION Fleet Operator, Insituform Technologies, requested investigation of incident. Mr. [REDACTED] stated he heard a loud pop as he was pulling into a parking space and the steering wheel had free play. He applied the brakes and placed the vehicle in park. He then looked underneath vehicle, and saw a tie rod hanging loose.
CRASH No
PROPERTY DAMAGE No
INJURIES 0
FATALITIES 0
ANALYSIS Inspection revealed¹ tie rod was separated from the pitman arm. The stud from the tie rod was still attached to pitman arm with the nut.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1197156
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	18011370
DATE OF INCIDENT	10/00/2008
DATE OF NOTICE	10/22/2008
MODEL/MODEL YEAR	2008 Dodge Ram 1500 Laramie Mega Cab 4x4
VIN	3D3KS19D18G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	9,754
OWNER	[REDACTED] Lacey, WA [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Suspension: Control Arm/Ball Joints: Broke
DESCRIPTION	Owner stated that he was entering a work site, making a 90 degree turn left, moving less than 5 MPH, when he heard a clunk. The steering went away and the truck, on its own, went straight into a cement wall. He stated after the incident, with the truck was still up against the cement wall, he saw the steering rod failure. He stated he then backed the vehicle backwards away from the cement wall and tried to assess what had happened. He stated he removed the retaining nut from the tie rod end thinking he could put the ball and socket back together enough to move the vehicle out of the work zone, but that did not work.
CRASH	Yes
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	Inspection revealed ¹ the vehicle had a riser/lift kit installed and was observed to have non-OEM tires and off-setting wheels. The pitman arm tie rod shank was fractured. The fracture was observed to be an elastic limit ductile shear in appearance. The passenger side of the shank revealed a dove tail in the fracture area. The pitman arm revealed a small portion of radius missing from upper portion of the taper in the pitman arm 180 degrees from dove tail. The retaining nut was observed to be barely started on the thread portion of the tie rod

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

shank. The bottom portion of the fractured tie rod shank was observed to have hammer impact marks. No lateral movement in the taper of the tie rod shank and pitman arm was observed. There was no twisting observed in the steering gear cross shaft lower splines mating to the pitman arm. It was observed the vehicle was approximately 1 ³/₄ inches above recommended height specifications. There was no steering column slack or steering wheel damage found. Appears the damage was caused by impact not component failure.

MATTER #	1212362
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	19515140
DATE OF INCIDENT	04/29/2010
DATE OF NOTICE	05/01/2010
MODEL/MODEL YEAR	2008 Dodge Ram 3500 Laramie 4x4
VIN	3D3MX49A08G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	35,102
OWNER	[REDACTED] Arlington, TX [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Suspension: Control Arm/Ball Joints: Broke
DESCRIPTION	Per a ROADSIDE CAIR, the left front tie rod end broke off. There is no statement from the driver of the vehicle as to how and when the tie rod broke. This claim was added to an existing lemon law claim that was filed for a number of unrelated complaints about the vehicle.
CRASH	Unknown
PROPERTY DAMAGE	Unknown
INJURIES	Unknown
FATALITIES	Unknown
ANALYSIS	There was no inspection of this vehicle.

MATTER # 1200608
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 18365385
DATE OF INCIDENT 02/17/2009
DATE OF NOTICE 02/23/2009
MODEL/MODEL YEAR 2008 Dodge Ram 3500 Slit Quad Cab 4x4
VIN 3D7MX48A28G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 39,043
OWNER [REDACTED]
COURT Tulsa, OK [REDACTED]
DOCKET # None
ALLEGED DEFECT Suspension: Tie Rods / Drag Links
Suspension: Control Arm/Ball Joints
DESCRIPTION Mr. [REDACTED] stated he was traveling approximately 25-30 mph when the steering failed resulting in a loss of control. The vehicle went off the road and ran through a fence. [REDACTED] stated the right front tie rod end was defective. Mr. [REDACTED] claimed a back injury as a result of the incident.
CRASH Yes
PROPERTY DAMAGE Yes
INJURIES 1
FATALITIES 0
ANALYSIS Inspection revealed¹ a lack of lubricant was the likely cause of the right front tie rod ball joint/socket assembly separation. The tie rods were equipped with grease fittings and it appeared the tie rod joints were not lubricated.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER # 1207617
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 19115149
DATE OF INCIDENT 09/14/2009
DATE OF NOTICE 11/24/2009
MODEL/MODEL YEAR 2008 Dodge Ram 3500 Slit Quad Cab 4x4
VIN 3D7MX48A28G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 29,500
OWNER [REDACTED]
COURT Hatboro, PA [REDACTED]
Arbitration
DOCKET # P093-00103-10-00
ALLEGED DEFECT Suspension: Tie Rods / Drag Links: Broke
DESCRIPTION Insurance Company advised that insured Robert Swan reported losing control due to a steering failure defect in the steering linkage, as noted in Chrysler Recall H26. There was no damage to the vehicle. Swan reported to his insurer that the steering loss caused him to run off the road damaging property. Recall H46 was completed on the vehicle on 09/18/2009, four days after the reported loss of control.
CRASH Yes
PROPERTY DAMAGE Yes
INJURIES 0
FATALITIES 0
ANALYSIS Per dealer personnel interview, the vehicle was towed to dealer by owner. Dealer personnel said the right side tie rod separated and the ball detached from the socket. There was no evidence of crash damage to joint or steering linkage. No driver interview or vehicle inspection.

MATTER #	1200402
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	18336801
DATE OF INCIDENT	06/21/2008
DATE OF NOTICE	02/10/2009
MODEL/MODEL YEAR	2008 Dodge Ram 3500 Laramie Quad Cab 4x4
VIN	3D7MX38A88G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	Unknown
OWNER	[REDACTED] Imperial, PA [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Suspension: Tie Rods / Drag Links::
DESCRIPTION	Insurance company alleged a property damage accident was due to the condition that was the subject of Recall H36, but provided no statement of the driver or other evidence of a defect.
CRASH	Yes
PROPERTY DAMAGE	Unknown
INJURIES	0
FATALITIES	0
ANALYSIS	The vehicle was not inspected. It was sold for scrap before Chrysler had opportunity to inspect.

MATTER # 1207191
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 19060908
DATE OF INCIDENT 10/31/2009
DATE OF NOTICE 11/2/2009
MODEL/MODEL YEAR 2009 Dodge Ram 2500 Slit Quad Cab 4x4
VIN 3D7KS28L59G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 17,247
OWNER [REDACTED]
COURT Pawhuska, OK [REDACTED]
DOCKET # None
ALLEGED DEFECT Steering: No Component:
DESCRIPTION Owner stated that as he experienced loss of steering control as he approached a curve in the road. The vehicle reportedly veered off the road and glanced a light pole with the right front passenger door, resulting in damage to the surface area of the door. Driver stated he did not hit anything prior to the steering failure.
CRASH Yes
PROPERTY DAMAGE Yes
INJURIES 0
FATALITIES 0
ANALYSIS Inspection revealed¹ the steering drag link inner joint appeared to have fractured in two resulting in separation of the drag link from the steering pitman arm, possibly causing a complete loss of steering control. Notice of the H36 recall had been sent to the owner on 05/01/09, five months prior to the reported crash, and was still incomplete at the time of the crash.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1207644
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	19079634
DATE OF INCIDENT	11/07/2009
DATE OF NOTICE	11/09/2009
MODEL/MODEL YEAR	2008 Dodge Ram 3500 Laramie 4x4
VIN	3D7MX48A18G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	49,000
OWNER	[REDACTED] Huron, OH [REDACTED]
COURT	Common Please Court, Erie, Ohio
DOCKET #	2010CV0107
ALLEGED DEFECT	Steering Vibration: Front
DESCRIPTION	Lawsuit alleges various lemon law claims including, among other claims of a defective engine, suspension and electrical system, a claim of "defective steering as evidenced by loss of steering." (Complaint is included in this submission.) Owner alleges she heard "snap" and lost steering control.
CRASH	Unknown
PROPERTY DAMAGE	Unknown
INJURIES	0
FATALITIES	0
ANALYSIS	The vehicle has not been inspected by Chrysler.

MATTER # 1218399
FILE TYPE Legal Claim
FILE NAME [REDACTED]
CAIR # 20263821
DATE OF INCIDENT 12/18/2010
DATE OF NOTICE 12/27/2010
MODEL/MODEL YEAR 2008 Dodge Ram 2500 St Reg Cab 4x4
VIN 3D7KS26D48G [REDACTED]
PEER OR SUBJECT Subject
MILEAGE 69,778
OWNER [REDACTED]
Louisburg, KS [REDACTED]
COURT None
DOCKET # None
ALLEGED DEFECT Steering: Linkage
DESCRIPTION Owner stated that his employee was driving the vehicle and had an accident. Owner was seeking verification that the accident was his employee's fault and not the fault of the vehicle. He stated that the employee-driver possibly hit the ditch first before hitting a bridge. He also stated that this same driver had a previous incident with this same truck and sheared off the steering drag link, at which time an aftermarket link was installed. Owner stated that he did not believe the H36 recall was the fault of the accident and he was contacting his insurance agent.
CRASH Yes
PROPERTY DAMAGE Yes
INJURIES 0
FATALITIES 0
ANALYSIS Inspection revealed¹ that the threads on the link and sleeve were in good condition. Although the link was an aftermarket part, size may have been an issue. The drag link was bent and has cement residue on it. The right front wheel was bent and the tire beads were broken loose resulting in loss of air pressure. It appeared that the link was pulled apart after the vehicle hit the bridge abutment. Owner stated that due to the driver's previous history of vehicle accidents that there was no reason to blame the replacement steering linkage parts.

¹ The interview was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1215487
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	19796121
DATE OF INCIDENT	Unknown
DATE OF NOTICE	08/04/2010
MODEL/MODEL YEAR	2008 Dodge Ram 2500 Slit Quad Cab 4x4
VIN	3D7KS28D78G [REDACTED]
PEER OR SUBJECT	Subject
MILEAGE	82,000
OWNER	[REDACTED] San Angelo, TX [REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Suspension: Control Arm/Ball Joints: Broke
DESCRIPTION	Driver states that the control arm broke while driving and the vehicle ended up in the ditch.
CRASH	Yes
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	No inspection. The owner never returned calls made to scheduling an inspection.

PE11-009

CHRYSLER

6/30/2011

Enclosure 2 - Field
Data, Field Legal,
Herington Police
Report

FATAL INVOLVED SUBJECT RELATED ROAD RELATED MEDICAL ADVISORY BOARD RE-AWARD AFFIDAVIT TO PROSECUTE



Texas Peace Officer's Crash Report

Submission of Crash Records: This report may be submitted via the CRIS Web Portal, electronically submitted via XML, or by mailing to the Texas Department of Transportation, Crash Records, PO Box 149349, Austin, TX 78714 (Questions? Call: 512/486-5700)

PLACE WHERE CRASH OCCURRED		Field Copy - Not From Custodial Files		LOCAL
COUNTY	CHEROKEE	CITY OR TOWN	JACKSONVILLE	CR# [REDACTED]
IF CRASH WAS OUTSIDE CITY LIMITS INDICATE FROM NEAREST TOWN	6.5	MILES N S E W		TRIBUT # [REDACTED]
ROAD ON WHICH CRASH OCCURRED	CR 3305	ROUTE NUMBER OR STREET CODE		CONSTRUCTION ZONE WORKING TIME SPENT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO SPEED LIMIT 60
INTERSECTING STREET OR RR CROSSING NUMBER		STREET OR ROAD NAME	CR 3306	CONSTRUCTION ZONE WORKING TIME SPENT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO SPEED LIMIT
NOT AT INTERSECTION	2.8	PT MI N S E W	CR	LATITUDE 31.983 LONGITUDE -95.389
DATE OF CRASH	JUNE 25 2009	DAY OF WEEK	THURSDAY	TIME 7:40 AM
UNIT # 1	1 MOTOR VEHICLE 2 TRAIN 3 PEDAL CYCLIST	4 PEDESTRIAN 5 MOTORIZED CONVEYANCE 6 TOWED	7 NON CONTACT 8 OTHER	VIN# 3D7MX48AX8G129099
YEAR MODEL 2008	COLOR & MAKE RED/DODGE	MODEL NAME	7500	BODY STYLE PU
DRIVER'S NAME	[REDACTED]	DRIVER'S LICENSE	TX [REDACTED]	EXPIRES 8/10/87
DRIVER'S ETHNICITY	1 WHITE 2 HISPANIC 3 ASIAN 4 OTHER	DRIVER'S SEX	<input checked="" type="checkbox"/> MALE <input type="checkbox"/> FEMALE	DRIVER'S OCCUPATION LABORER
TYPE OF ALCOHOL SPECIMEN TAKEN	1 BREATH 2 BLOOD 3 URINE 4 NONE 5 REFUSED	TEST RESULTS 4	TYPE OF DRUG SPECIMEN TAKEN	1 BLOOD 2 URINE 3 NONE 4 REFUSED
TEST RESULTS		TEST RESULTS	3	DRUG CATEGORY 2
LIABILITY INSURANCE	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> EXP	INSURANCE COMPANY GEICO	VEHICLE DAMAGE RATING	12-FD-1
UNIT #	1 MOTOR VEHICLE 2 TRAIN 3 PEDAL CYCLIST	4 PEDESTRIAN 5 MOTORIZED CONVEYANCE 6 TOWED	7 NON CONTACT 8 OTHER	VIN#
YEAR MODEL	COLOR & MAKE	MODEL NAME	BODY STYLE	LICENSE PLATE
DRIVER'S NAME	LAST FIRST MI	ADDRESS (CITY OR STATE OR)		
DRIVER'S LICENSE	STATE CLASS TYPE	EXPIRES	LICENSE STATUS	1-VALID 2-NOT VALID 3-SUSPENDED/REVOKED 4-EXPIRED 5-UNKNOWN
DRIVER'S ETHNICITY	1-WHITE 2-HISPANIC 3-ASIAN 4-OTHER	DRIVER'S SEX	<input type="checkbox"/> MALE <input type="checkbox"/> FEMALE	DRIVER'S OCCUPATION
TYPE OF ALCOHOL SPECIMEN TAKEN	1 BREATH 2 BLOOD 3 URINE 4 NONE 5 REFUSED	TEST RESULTS	TYPE OF DRUG SPECIMEN TAKEN	1 BLOOD 2 URINE 3 NONE 4 REFUSED
TEST RESULTS		TEST RESULTS		DRUG CATEGORY 2
LIABILITY INSURANCE	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> EXP	INSURANCE COMPANY	VEHICLE DAMAGE RATING	
DAMAGE TO PROPERTY OTHER THAN VEHICLES				
OBJECTS	WIRE FENCE/MAILBOX	NAME AND ADDRESS OF OWNER	RAY RICHARD 5500 CR 3305 JACKSONVILLE, TX	ESTIMATED COST \$500
IN YOUR OPINION, DID THIS CRASH RESULT IN AT LEAST \$1,000.00 DAMAGE TO ANY ONE PERSON'S PROPERTY? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
CHARGES FILED				
NAME	NONE	CHARGE		CITATION#
NAME		CHARGE		CITATION#
TIME NOTIFIED OF CRASH	6/25/09 7:45 PM	HOW	CHEROKEE COUNTY SO	TIME ARRIVED AT SCENE 6/25/09 8:05 PM
DATE OF REPORT	6/25/09	REPORT COMPLETE	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF INVESTIGATOR	FULTON, J.L.	ID#	8905	AGENCY
			DPS/THP	DIS/AREA 6C10

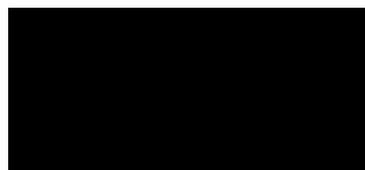
PE11-009

CHRYSLER

6/30/2011

Enclosure 2 - Field

Data, Field Legal,

 Complaint

CT Corporation

**Service of Process
Transmittal**

02/17/2010

CT Log Number 516166825



1207644
ERP to CASE

TO: Melissa Gravlin
Chrysler Group LLC
Office Of General Counsel, 1000 Chrysler Drive
CIMS: 485-13-62
Auburn Hills, MI 48326-2766

RE: Process Served in Ohio

FOR: Chrysler Group LLC (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: [REDACTED] vs. Chrysler Group, LLC, Dft.
Name discrepancy noted.

DOCUMENT(S) SERVED: Summons, Complaint, Exhibit(s)

COURT/AGENCY: Erie County Court of Common Pleas, OH
Case # 2010CV0107

NATURE OF ACTION: Product Liability Litigation - Breach of Warranty - Failure to correct and/or repair defects on a 2008 Dodge Ram 3500

ON WHOM PROCESS WAS SERVED: C T Corporation System, Cleveland, OH

DATE AND HOUR OF SERVICE: By Certified Mail on 02/16/2010 postmarked on 02/11/2010

APPEARANCE OR ANSWER DUE: Within 28 days after service, exclusive of the day of service - File answer with Pltf.'s attorney or upon the Pltf. if he/she has no attorney of record // Within 3 days after the service of answer on Pltf.'s attorney - File answer with the court

ATTORNEY(S) / SENDER(S): David Tannehill
Krohn & Moss, Ltd.
3 Summit Park Drive, Suite 140
Independence, OH 44131
216-901-0609

ACTION ITEMS: SOP Papers with Transmittal, via Fed Ex Standard Overnight, 791520356136
Image SOP

SIGNED: C T Corporation System
PER: Debra Justice
ADDRESS: 1300 East 9th Street
Suite 1010
Cleveland, OH 44114
TELEPHONE: 216-621-4270

RECEIVED

FEB 18 2010

MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.

**Chrysler Group LLC
Office of the General Counsel**

FEB 18 2010

By: [Signature] Mall/Reg. Agent/
Sec. of State/Proc. Server

Page 1 of 1 / ET

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

COURT OF COMMON PLEAS, ERIE COUNTY

323 Columbus Avenue, Sandusky, Ohio 44870

SUMMONS

Rule 4 1970 Ohio Rules of Civil Procedure

Case No. 2010 CV 0107

[REDACTED]
Huron OH [REDACTED]

SUMMONS ON COMPLAINT

vs.

Defendant(s):

Chrysler Group LLC
% CT Corporation System 1300 East Ninth Street
Cleveland OH 44114

To the above named defendant(s):

You are hereby summoned that a complaint (a copy of which is hereto attached and made a part hereof) has been filed against you in this court by the plaintiff(s) named herein.

You are required to serve upon the plaintiff's attorney, or upon the plaintiff's if he/she has no attorney of record, a copy of your answer to the complaint within **28 days** after service of this summons upon you, exclusive of the day of service. Said answer must be filed with this court within three days after service on Plaintiff's Attorney.

The name and address of the plaintiff's attorney is as follows:

David Tannehill
Krohn & Moss Ltd
3 Summit Park Drive
Independence OH 44131

If you fail to appear and defend, judgment by default will be taken against you for the relief demanded in the complaint.

February 10, 2010
Z000035979

BARBARA J. JOHNSON, Clerk

Gwendolyn A. Stovall
By Gwendolyn A. Stovall, Deputy

FILED
COMMON PLEAS COURT
ERIE COUNTY, OHIO

2010 FEB -8 PM 12:55

BARBARA J. JOHNSON
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS
ERIE COUNTY, OHIO

SANDRA SLIVKA
558 Wilbor Avenue
Huron OH 44839

Plaintiff,

vs.

CHRYSLER GROUP, LLC
c/o CT Corporation System
1300 East Ninth Street
Cleveland, Ohio 44114

Defendant.

No. 2010CV0107

JURY DEMAND ENDORSED HEREON

REBINETTE

COMPLAINT

NOW COMES the Plaintiff, SANDRA SLIVKA, by and through her attorneys, KROHN & MOSS, LTD., and for her complaint against Defendant, CHRYSLER GROUP, LLC, alleges and affirmatively states as follows:

PARTIES

1. Plaintiff, SANDRA SLIVKA ("Plaintiff"), is an individual who was at all times relevant hereto residing in the State of Ohio and/or Florida.
2. Defendant, CHRYSLER GROUP, LLC ("Manufacturer"), is a foreign corporation authorized to do business in the State of Ohio, and is engaged in the manufacture, sale, and distribution of motor vehicles and related equipment and services. Manufacturer is also in the business of marketing, supplying and selling written warranties to the public at large through a system of authorized dealerships, including Dayton Andrews Dodge ("Seller"). Manufacturer does business in all counties of the State of Ohio including Erie County.

BACKGROUND

3. On or about September 22, 2008, Plaintiff purchased from Seller, a 2008 Dodge Ram 3500 ("Ram 3500"), manufactured and/or distributed by Manufacturer, Vehicle Identification Number 3D7MX48A18G234999, as reflected in the document attached hereto as Exhibit 1.

4. The price of the Ram 3500, including certain collateral charges, such as registration charges, document fees, and sales tax, including finance charges, totaled \$45,648.00.

5. Plaintiff avers that as a result of ineffective repair attempts made by Manufacturer, the Ram 3500 cannot be utilized for personal, family and household use as was intended by Plaintiff at the time of acquisition.

6. In consideration for the purchase of the Ram 3500, Manufacturer issued and supplied to Plaintiff its written warranty which included three (3) year or thirty-six thousand (36,000) mile bumper to bumper warranty and lifetime "power-train" warranty.

7. On or about September 22, 2008, Plaintiff took possession of the Ram 3500 and, shortly thereafter, experienced the various defects listed below that substantially impair the use, value and/or safety of the Ram 3500.

8. The defects described below violate the written warranty issued to Plaintiff by Manufacturer.

9. Plaintiff has delivered the Ram 3500 to Manufacturer's authorized servicing dealerships on numerous occasions.

10. Plaintiff has brought the Ram 3500 to Seller and/or an authorized servicing dealership of Manufacturer for attempted repairs to various defects, including but not limited to:

a. Defective steering as evidenced by the overall loss of steering;

- b. Defective engine as evidenced by the vehicle trembling and hesitating on start up and by a vibration;
 - c. Defective electrical system;
 - d. Defective suspension as evidenced by a vibration in the front end; and
 - e. Any additional complaints made by Plaintiff, whether or not they are contained on any repair orders from Manufacturer's authorized dealerships.
11. Plaintiff has provided Manufacturer sufficient opportunity to repair and/or replace defective parts in the Ram 3500 pursuant to its written warranty.
 12. After a reasonable number of attempts to cure the defects in Plaintiff's Ram 3500, Manufacturer and its authorized servicing dealerships have been unable and/or have failed to repair the defects as provided in Manufacturer's written warranty.
 13. Plaintiff has justifiably lost confidence in the Ram 3500's safety and reliability and said defects have substantially impaired the use, value and/or safety of the Ram 3500 to Plaintiff.
 14. Said defects could not reasonably have been discovered by Plaintiff prior to Plaintiff's acceptance of the Ram 3500.
 15. As a result of these defects, Plaintiff revoked her acceptance of the Ram 3500.
 16. At the time of revocation, the Ram 3500 was in substantially the same condition as at delivery except for damage caused by its own defects and ordinary wear and tear.
 17. Manufacturer has refused Plaintiff's revocation of acceptance and has refused to provide Plaintiff with the remedies to which Plaintiff is entitled upon revocation.
 18. The Ram 3500 remains in a defective and unmerchantable condition and continues to exhibit some or all of the above mentioned defects that substantially impair its use, value and/or safety.

19. Plaintiff has been and will continue to be financially damaged due to Manufacturer's failure to comply with the provisions of its written warranty and its failure to provide Plaintiff with a merchantable Ram 3500.

COUNT I
BREACH OF WRITTEN WARRANTY PURSUANT TO
THE MAGNUSON-MOSS WARRANTY ACT
MANUFACTURER

20. Plaintiff re-alleges and incorporates by reference as though fully set forth herein, all paragraphs of this Complaint as set forth above.

21. Plaintiff is a purchaser of a consumer product who received the Ram 3500 during the duration of a written warranty period applicable to the Ram 3500 and who is entitled by the terms of the written warranty to enforce against Manufacturer the obligations of said warranty.

22. Manufacturer is a "person" engaged in the business of making a consumer product directly available to Plaintiff.

23. Seller is an authorized dealership and agent of Manufacturer designated to perform repairs on vehicles pursuant to Manufacturer's written warranty.

24. Plaintiff's purchase of the Ram 3500 was accompanied by a written warranty covering defects in material or workmanship, an undertaking in writing to repair or replace defective parts or take other remedial action free of charge to Plaintiff with respect to the Ram 3500 in the event that the Ram 3500 failed to meet the specifications set forth in Manufacturer's written warranty.

25. Said warranty was the basis of the bargain of the contract between the Plaintiff and Manufacturer for the sale of the Ram 3500 to Plaintiff.

26. Said purchase of Plaintiff's Ram 3500 was induced by and Plaintiff relied upon, Manufacturer's written warranty.

27. Plaintiff has met all of her obligations and preconditions as provided in Manufacturer's written warranty.

28. As a direct and proximate result of Manufacturer's failure to comply with its written warranty, Plaintiff has suffered damages and, in accordance with 15 U.S.C. § 2310(d)(1), Plaintiff is entitled to bring suit for such damages and other legal and equitable relief.

WHEREFORE, Plaintiff, SANDRA SLIVKA, prays for judgment against Manufacturer as follows:

- a. Return of all monies paid or diminution in value of the Ram 3500, incurred and/or needed costs of repair, and all incidental and consequential damages incurred, including, but not limited to, all finance charges incurred;
- b. All reasonable attorneys' fees, witness fees, court costs and other fees incurred by Plaintiff; and
- c. Such other and further relief that this Court deems just and appropriate.

COUNT II
BREACH OF IMPLIED WARRANTY PURSUANT TO
THE MAGNUSON-MOSS WARRANTY ACT
MANUFACTURER

29. Plaintiff re-alleges and incorporates by reference as though fully set forth herein, all paragraphs of this Complaint as set forth above.

30. The Ram 3500 purchased by Plaintiff was subject to an implied warranty of merchantability as defined in 15 U.S.C. § 2301(7), running from Manufacturer to Plaintiff.

31. Manufacturer is a supplier of consumer goods as a "person" engaged in the business of making a consumer product directly available to Plaintiff.

32. Manufacturer is prohibited from disclaiming or modifying any implied warranty when making a written warranty to the consumer.

33. Plaintiff's Ram 3500 was impliedly warranted to be substantially free of defects in both material and workmanship and thereby fit for the ordinary purpose for which the Ram 3500 was intended.

34. The above-described defects present in the Ram 3500 render the Ram 3500 unmerchantable and thereby not fit for the ordinary purpose for which the Ram 3500 was intended and as represented by Manufacturer.

35. As a result of the breach of implied warranty by Manufacturer, Plaintiff is without the reasonable value of the Ram 3500.

36. As a result of the breach of implied warranty by Manufacturer, Plaintiff has suffered and continues to suffer various damages.

WHEREFORE, Plaintiff, SANDRA SLIVKA, prays for judgment against Manufacturer as follows:

- a. Return of all monies paid or diminution in value of the Ram 3500, incurred and/or needed costs of repair, and all incidental and consequential damages incurred, including, but not limited to, all finance charges incurred;
- b. All reasonable attorneys' fees, witness fees, court costs and other fees incurred by Plaintiff; and
- c. Such other and further relief that this Court deems just and appropriate.

JURY DEMAND

Plaintiff demands trial by jury on all issues in this action, except for any issues relating to:

1. The amount of attorneys' fees and litigation costs to be awarded should Plaintiff prevail in this action.

Respectfully Submitted,

By:



David Tannehill
One of Plaintiff's Attorneys

David Tannehill
Ohio Registration No. 0083968

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I HEREBY CERTIFY THIS TO BE
A TRUE COPY OF THE ORIGINAL
FILED IN THIS OFFICE.

BARBARA J. JOHNSON, CLERK OF COURTS
Erie County, Ohio

By:

