

PE11-009

CHRYSLER

7-13-2011

Enclosure 2

Field Data

Field Reports - Peer

Legal Backup Documents PG. 5

Legal Summaries PG. 36

PE11-009

CHRYSLER

7-13-2011

Enclosure 2

Field Data

Field Reports - Peer

# Field Engineer Analysis Report



Issue Number: WT7016SM329091  
Business Group: PQRC Field Engineer  
Location: Phoenix  
Issue Type: Non-Powertrain  
Category: Reliability  
Reported By: Mirka, Steve  
Phone: +1 602 336 1529  
Created On: 11/25/2009

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>
DM	8G [REDACTED]	60541	081023	08625	ETJF 2087 B3E6 0	DG3 S157 7000 43	

**CONCERN #1**

Customer Concern:

The shaft on the ball joint on the outer left tie rod broke off. This occurred as the driver was pulling up to a traffic light and hit a small hole in the road. This vehicle is a Dodge Ram 5500 Standard Cab Chassis.

Root Cause:

Unknown

LABOR OPERATION: 19630103 Replace left side outer tie rod end  
KEYWORDS: SupplierQuality PartReturn DurabilityReliability  
PARTS: 68041823AB Tie Rod  
COST OF REPAIR: \$224.60  
CUSTOMER SATISFACTION: L20

Repair Action:

# Field Engineer Analysis Report



The tie rod was replaced and the original was returned to the Quality Engineering Center. The vehicle is out of warranty

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

Issue Number: WT7016SM329091  
Business Group: PQRC Field Engineer  
Location: Phoenix  
Issue Type: Non-Powertrain  
Category: Reliability  
Reported By: Mirka, Steve  
Phone: +1 602 336 1529  
Created On: 11/25/2009

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>
DM	8G [REDACTED]	60541	081023	08625	ETJF 2087 B3E6 0	DG3 S157 7000 43	

# Field Engineer Analysis Report



## Part Information

Part Number	Part Description	Quantity	Cost/Unit	Fail Cd	Retn Dt
68041823AB	PACKAGE -OUTER END	1	0.00		01/01/0001
68041823AB	PACKAGE -OUTER END	1	0.00		

PE11-009

CHRYSLER

7-13-2011

Enclosure 2

Field Data

Legal Backup Documents



**Service of Process  
Transmittal**

06/15/2010

CT Log Number 516791393

**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 Kentucky

**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] individually and as Administratrix of the Estate of [REDACTED]  
[REDACTED] Deceased and as Guardian of [REDACTED] a minor under the age of 18,  
Pltf. vs. Chrysler Group, LLC., Dft.  
*Name discrepancy noted.*

**DOCUMENT(S) SERVED:** Summons, Complaint

**COURT/AGENCY:** Clay County Circuit Court, KY  
Case # 10-CI-00230

**NATURE OF ACTION:** Product Liability Litigation - Manufacturing Defect - Wrongful Death - Pertaining to  
defective steering linkage and/or other steering components of 2006 Dodge Ram  
2500 which caused collision resulting in fatal injuries on 06/15/2009

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Frankfort, KY

**DATE AND HOUR OF SERVICE:** By Certified Mail on 06/15/2010 postmarked on 06/14/2010

**APPEARANCE OR ANSWER DUE:** Within 20 days

**ATTORNEY(S) / SENDER(S):** James D. Holliday  
PO Box 29  
Hazard, KY 41702  
606-439-2600

**ACTION ITEMS:** SOP Papers with Transmittal, via Fed Ex 2 Day , 791530454870  
Image SOP

**SIGNED:** C T Corporation System  
**PER:** Anthony Romano  
**ADDRESS:** 306 W. Main Street  
Suite 512  
Frankfort, KY 40601  
**TELEPHONE:** 800-592-9023

**Chrysler Group LLC**  
Office of the General Counsel  
JUN 21 2010  
By Ad Z Mall/Reg. Agent  
Sec. of State/Proc. Server

AOC-105 Doc. Code: CI  
Rev. 1-07 06/10/2010 02:46 pm  
Page 1 of 1 Ver. 1.02  
Commonwealth of Kentucky  
Court of Justice www.courts.ky.gov  
CR 4.02; CR Official Form 1



CIVIL SUMMONS

Case No. 10-CI-00230  
Court ☒ Circuit ☐ District  
County Clay

PLAINTIFF

SHERRY BAKER, INDIVIDUALLY, et al.

VS.

DEFENDANT

CHRYSLER GROUP LLC

Service of Process Agent for Defendant:

CT Corporation Systems

306 West Main Street, Suite 512

Frankfort

Kentucky

40601

THE COMMONWEALTH OF KENTUCKY  
TO THE ABOVE-NAMED DEFENDANT(S):

You are hereby notified a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within 20 days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached Complaint.

The name(s) and address(es) of the party or parties demanding relief against you are shown on the document delivered to you with this Summons.

Date: 6-14- 2010

James S. Phillips Clerk  
By: RCM D.C.

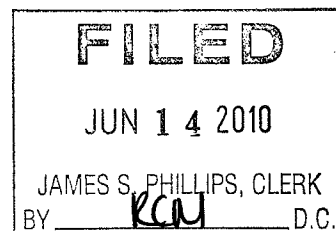
Proof of Service

This Summons was served by delivering a true copy and the Complaint (or other initiating document) to:

this \_\_\_\_ day of \_\_\_\_\_, 2\_\_\_\_.

Served by: \_\_\_\_\_  
Title \_\_\_\_\_

COMMONWEALTH OF KENTUCKY  
CLAY CIRCUIT COURT  
CIVIL ACTION NO. 10-CI- 00230



SHERRY BAKER, INDIVIDUALLY AND  
AS ADMINISTRATRIX OF THE ESTATE OF  
JIMMIE DARRELL BAKER, DECEASED  
and SHERRY BAKER, AS GUARDIAN OF  
MATTHEW BAKER, A MINOR UNDER THE  
AGE OF 18  
Post Office Box 254  
Bulan, Kentucky 41722

PLAINTIFFS

vs.

**COMPLAINT**

CHRYSLER GROUP, LLC.

DEFENDANT

Serve: Processing Agent: C.T. Corporation Systems  
306 West Main Street, Suite 512  
Frankfort, KY 40601

\*\*\* \*\*

Comes the Plaintiff, and for her Complaint herein, states as follows:

COUNT I

1. Plaintiff, Sherry Baker, is the surviving spouse and Administratrix of the Estate of Jimmie Darrell Baker, deceased. She was appointed Administratrix by Order of the Perry District Court on July 16, 2009; a certified copy of the order of appointment is attached as Exhibit "A."

2. Plaintiff, Matthew Baker, is the minor son of Jimmie Darrell Baker, deceased and Sherry Baker was appointed Guardian over the Estate of Matthew Baker, a minor under the age of 18, on September 3, 2009. A certified copy of the order of appointment is attached as Exhibit "B."

3. The Defendant, Chrysler Group, LLC is a foreign corporation authorized to do business in this Commonwealth. It has appointed CT Corporation System, 306 W Main Street, Suite 512, Frankfort, KY 40601 as its agent for service of process.

## COUNT II

1. Before June 15, 2009, Defendant, Chrysler Group, LLC, marketed and sold a 2006 Dodge Ram 2500, VIN # 3D7KS28C16G161576 to Napier and Son Trucking.

2. Before June 15, 2009, Defendant, Chrysler Group LLC, designed, manufactured, marketed and distributed the 2006 Dodge Ram 2500 referred to above.

3. On June 15, 2009, in Clay County, Kentucky, Defendant, Richard Napier's vehicle collided with the vehicle being driven by Jimmie Darrell Baker, resulting in fatal injuries.

4. Defendant, Chrysler Group, LLC negligently designed, manufactured, marketed and distributed said Dodge Ram 2500 in such a manner that it created an unreasonable risk of physical harm and injury; this negligence, included, but was not limited to, improper and dangerous design, testing and inspection.

5. Defendant, Chrysler Group, LLC, as designer, manufacturer, distributor, and seller, as well as through its marketing of this product, made implied and expressed warranties that the Dodge Ram 2500 was reasonably fit for the general uses and purposes intended, and that it was free of any defects in its design or construction.

6. Defendant, Chrysler Group LLC unreasonably failed to warn of the known and foreseeable hazards of said Dodge Ram 2500, both before and after the sale of said Dodge Ram 2500.

7. The fatal injuries of Jimmie Darrell Baker are the direct and proximate result of the actions and omissions on the part of the Defendant, Chrysler Group, LLC.

8. Defendant, Chrysler Group, LLC should be held strictly liable as the designer, manufacturer, distributor, and seller of said 2006 Dodge Ram 2500, which was in defective condition and unreasonably dangerous to users.

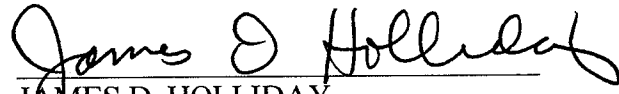
9. There is pending in Clay Circuit Court, Civil Action No. 09-CI-00319, an action against Shelly Napier, As Administratrix of the Estate of Richard Napier, Deceased, Napier & Son Trucking, Inc., Nationwide Agribusiness Insurance Company and American Commerce Insurance Company and this case should be consolidated with that civil action.

10. As a direct and proximate result of the acts and omissions of the Defendants as set out above, Sherry Baker, Individually and as Administratrix of the Estate of Jimmie Darrell Baker and Sherry Baker as guardian of Mathew Baker, a minor under the age of 18, has sustained damages as follows:

- a. Funeral expenses;
- b. Impairment of his earning capacity over Jimmie Darrell Baker's lifetime;
- c. Loss of consortium for Sherry Baker and Mathew Baker;
- d. Pain and suffering.

WHEREFORE, the Plaintiff, demands judgment against the Defendant, Chrysler Group LLC, in a sum in excess of any minimum jurisdictional amount of this court; trial by jury; interest; her costs herein; and any and all other relief to which she may appear

entitled.

A handwritten signature in cursive script, reading "James D. Holliday". The signature is written in black ink and is positioned above a horizontal line.

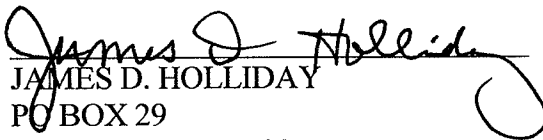
JAMES D. HOLLIDAY

PO BOX 29

HAZARD, KY 41702

(606) 439-2600

by jury; interest; her costs herein; and any and all other relief to which she may appear entitled.

  
JAMES D. HOLLIDAY  
PO BOX 29  
HAZARD, KY 41702  
(606) 439-2600

VERIFICATION

I, Sherry Baker, under oath, state that I have read the foregoing Complaint and that said complaint is true and correct to the best of my knowledge and belief.

Sherry Baker  
SHERRY BAKER

STATE OF KENTUCKY

COUNTY OF PERRY

Subscribed and sworn to before me by, Sherry Baker, this 10<sup>th</sup> day of June,  
2010.

My commission expires 8/15/2011.

Doris Jean Amburgey  
NOTARY PUBLIC, STATE AT LARGE

KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT									
								MASTER FILE # 70726064	
INVESTIGATING AGENCY KY STATE POLICE, CVE					AGENCY ORI NUMBER 0370200			LOCAL CODE 200910669	
ROADWAY NAME HR9006		PARKING LOT: N		INTERSECTION WITH: N		BETWEEN STREETS: N			
ROADWAY # HR9006	DISTANCE FROM MILEPOINT MILES: 0	MILEPOINT # 23.329	INJURED	KILLED 002	# UNITS INVOLVED 2	HIT & RUN NO	ONE WAY NO	SPEED LIMIT 055 MPH	
IN CITY LIMITS? NO		LATITUDE DEG: 37 MIN: 08.269				COLLISION DATE AND TIME 06/15/2009 11:08			
MILES FROM CITY 2 MILES EAST		LONGITUDE DEG: 83 MIN: 43.023							
CITY/TOWN: 02601 - MANCHESTER			RAMP: NO						
COUNTY: 026 - CLAY			FROM:						
SECONDARY COLLISION: NO			MEDIAN CROSSOVER: NO			TO: DIR:			
MANNER OF COLLISION 03 - HEAD ON			LOCATION 1ST EVENT 03 - ON ROADWAY			TRAFFIC CONTROL 02 - CENTER LINE 97 - OTHER			
ROADWAY TYPE 06 - PARKWAY		TOTAL LANES 2	ROADWAY CHARACTER 06 - STRAIGHT & LEVEL			ROADWAY SURFACE 01 - ASPHALT		ROADWAY CONDITION 01 - DRY	
WEATHER 03 - CLOUDY		LIGHT CONDITION 02 - DAYLIGHT			LAND USE 07 - RURAL		SCHOOL BUS RELATED 03 - NOT APPLICABLE		
FIRST AID AT SCENE NO		FIRST AID GIVEN BY							
INJURED REMOVED TO 00097 - OTHER									
EMS AGENCY AND RUN # 17151831			EMS AGENCY AND RUN #			EMS AGENCY AND RUN #			
NOTIFIED TIME 15:00	ARRIVED TIME 15:24	TIME AT HOSPITAL	NOTIFIED TIME	ARRIVED TIME	TIME AT HOSPITAL	NOTIFIED TIME	ARRIVED TIME	TIME AT HOSPITAL	
INJURED OR DECEASED REMOVED BY 01 - FUNERAL HOME/CORONER'S OFFICE									
1 PROPERTY DAMAGE - OTHER THAN VEHICLES						PROPERTY			
OWNER/ADDRESS									
2 PROPERTY DAMAGE - OTHER THAN VEHICLES						PROPERTY			
OWNER/ADDRESS									
3 PROPERTY DAMAGE - OTHER THAN VEHICLES						PROPERTY			
OWNER/ADDRESS									
INV. COMPLETE YES		PHOTOS YES		PHOTOGRAPHER UNIT NO. 477 / 4252					
INVESTIGATOR REAMS G				ID NUMBER 4252	BEAT OR POST NO. POST 4	TIME NOTIFIED 14:28	TIME ARRIVED 14:55	RDWY OPENED 18:00	
REVIEWED BY M TAYLOR								PAGE 1 OF 5	

**KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT - NARRATIVE**

KSP 74 Revised 1/2000

MASTER FILE # 70726064

INVESTIGATING AGENCY KY STATE POLICE, CVE

AGENCY ORI NUMBER 0370200

LOCAL CODE 200910669

Unit 1 traveling East on Hal Rogers Parkway turned into path of Unit 2 causing a head on collision. Unit 1 driver was ejected during collision, and Unit 2 driver was trapped in the cab of the tractor. Fire caused heavy damage to both units following the collision. Clay County Coroner pronounce both drivers dead at the scene. Toxicology was request by Officer Reams and refused by County Coroner for both drivers. Witness stated that Unit 1 turned into path of Unit 2 last second and Unit 2 did not have time to react. Witness did not see any reason for Unit 1 to steer into the path of Unit 2.

KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT - UNIT																											
INVESTIGATING AGENCY KY STATE POLICE, CVE										MASTER FILE # 70726064		AGENCY ORI NUMBER 0370200		LOCAL CODE 200910669													
UNIT # 1		TOWED? YES - ALLEN'S TOWING				# OCCUPANTS 1		PEDESTRIAN FACTORS																			
OPERATOR'S LIC. NO. N95678620				STATE KY		LIC. CLASS AD		ENDORSEMENT T		OPERATORS LICENSE RESTRICTIONS																	
CDL YES		CO. RESIDENT YES		OWNER YES																							
OPERATOR NAME (LN, FN, MI) NAPIER, RICHARD H																											
DATE OF BIRTH 08/31/1970		ADDRESS [REDACTED]																									
A. PRE-COLLISION VEHICLE ACTION 97 - OTHER						B. UNIT TYPE 08-LT TRUCK(VAN/SPORTS UTILITY/PICKUP)				C. FIRE YES		D. OVERTURNED NO															
E. HUMAN FACTORS 97 - OTHER																											
F-H. EVENT COLLISION 1ST: 05 - OTHER MOTOR VEHICLE 2ND: 34 - FIRE/EXPLOSION																											
I. VEHICULAR FACTORS 99 - NONE DETECTED								J. ENVIRONMENTAL FACTORS 99 - NONE DETECTED																			
K. UNDERRIDE/OVERRIDE 01 - NO UNDERRIDE/OVERRIDE																											
INVOLVED PERSONS: NAME, ADDRESS, CITY, STATE AND ZIP																											
[REDACTED] MALE				DOB/DOD		14		15		16		17		18		19		20		21		22		23			
MANCHESTER, KY				DOB: 08/31/1970 DOD: 06/15/2009		08,01		YES		01		01		08		02		02		01		03		11			
VEH YEAR 2006		MAKE DODGE				MODEL RAM 2500 PU				TYPE PK		STATE KY		REGISTRATION NUMBER 369086				YEAR 2010									
VEHICLE ID NUMBER 3D7KS28C16G				VEHICLE INSURED YES		NAME OF INSURANCE CO. KY FARM BUREAU INS								COLOR OF VEH BLUE													
1ST AREA OF CONTACT 01 - FRONT VEHICLE				1ST AREA CONTACT - COMBINATION VEHICLE				EXTENT OF DAMAGE VERY SEVERE				AIR BAG SWITCH NOT PRESENT				TRAVEL DIRECTION EAST											
ESTIMATED TRAVEL SPEED						MOST HARMFUL EVENT 05 - OTHER MOTOR VEHICLE																					
COMMERCIAL VEH. NO		LARGE TRUCK OR BUS NO		PLACARD PRESENT		HAZ. CARGO		HAZ. SPILL		HAZ. CARGO CODE		TYPE CARGO/COMMODITY				NAS SAFETY REPORT #											
HM CLASS										CARRIER TYPE																	
SINGLE/COMBINATION/BOBTAIL				NO. AXLES		NO. TRAILERS		US DOT #		ICC MC #		CRASH AVOIDANCE (Fatal Only) OTHER AVOIDANCE MANUEVER															
VEHICLE CONFIGURATION						CARGO BODY TYPE						BUS USE															
GVWR TOTAL				MOTOR CARRIER NAME								CARRIER NAME SOURCE															
MOTOR CARRIER ADDRESS																											
VIOLATION CODES		CITATION NUMBER		CASE NUMBER		SUSPECTED DRINKING DRIVER NO		METHOD OF DETERMINATION 97 - OTHER																			
TAKEN BY																											
TEST OFFERED NO		CHEMICAL TEST				TESTED FOR				SENT TO				RESULTS				PAGE									
3 OF 5																											

KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT - UNIT																									
INVESTIGATING AGENCY <b>KY STATE POLICE, CVE</b>										MASTER FILE # <b>70726064</b>		AGENCY ORI NUMBER <b>0370200</b>		LOCAL CODE <b>200910669</b>											
UNIT # <b>2</b>		TOWED? <b>YES - R &amp; S TOWING</b>				# OCCUPANTS <b>1</b>		PEDESTRIAN FACTORS																	
OPERATOR'S LIC. NO <b>B94122723</b>				STATE <b>KY</b>		LIC. CLASS <b>AD</b>		ENDORSEMENT <b>X</b>		OPERATORS LICENSE RESTRICTIONS															
CDL <b>YES</b>		CO. RESIDENT <b>NO</b>		OWNER <b>NO</b>																					
OPERATOR NAME (L.N., F.N., MI) [REDACTED]																									
DATE OF BIRTH <b>12/02/1960</b>		ADDRESS [REDACTED] <b>BULAN, KY</b>																							
COMPLIANT <b>YES</b>																									
A. PRE-COLLISION VEHICLE ACTION <b>05 - GOING STRAIGHT AHEAD</b>						B. UNIT TYPE <b>23-TRUCK TRACTOR &amp; SEMI-TRAILER</b>				C. FIRE <b>YES</b>		D. OVERTURNED <b>NO</b>													
E. HUMAN FACTORS <b>99 - NONE DETECTED</b>																									
F.H. EVENT COLLISION 1ST: <b>05 - OTHER MOTOR VEHICLE</b> 2ND: <b>34 - FIRE/EXPLOSION</b>																									
I. VEHICULAR FACTORS <b>99 - NONE DETECTED</b>						J. ENVIRONMENTAL FACTORS <b>99 - NONE DETECTED</b>																			
K. UNDERRIDE/OVERRIDE <b>01 - NO UNDERRIDE/OVERRIDE</b>																									
INVOLVED PERSONS: NAME, ADDRESS, CITY, STATE AND ZIP																									
[REDACTED] <b>MALE</b>				DOB/DOD <b>DOB: 12/02/1960 DOD: 06/15/2009</b>		14		15		16		17		18		19		20		21		22		23	
<b>BULAN, KY</b>						<b>01</b>		<b>YES</b>		<b>01</b>		<b>01</b>		<b>08</b>		<b>01</b>		<b>04</b>		<b>02</b>		<b>01</b>		<b>01</b>	
<b>CHILDERS, TRANSPORT INC PO BOX 430 WHITESBURG, KY 418580430</b>						<b>08</b>		<b>NO</b>																	
VEH YEAR <b>2003</b>		MAKE <b>PETERBILT-MOTORS</b>				MODEL <b>CBE</b>				TYPE <b>DS</b>		STATE <b>KY</b>		REGISTRATION NUMBER [REDACTED]				YEAR <b>2010</b>							
VEHICLE ID NUMBER <b>1XP5DB9X43N</b>				VEHICLE INSURED <b>YES</b>		NAME OF INSURANCE CO. <b>NATIONWIDE AGRA BUSINESS</b>								COLOR OF VEH <b>PURPLE</b>											
1ST AREA OF CONTACT				1ST AREA CONTACT - COMBINATION VEHICLE <b>01 - FRONT VEHICLE</b>				EXTENT OF DAMAGE <b>VERY SEVERE</b>				AIR BAG SWITCH <b>NOT PRESENT</b>				TRAVEL DIRECTION <b>WEST</b>									
ESTIMATED TRAVEL SPEED				MOST HARMFUL EVENT <b>05 - OTHER MOTOR VEHICLE</b>																					
COMMERCIAL VEH. <b>YES</b>		LARGE TRUCK OR BUS <b>YES</b>		PLACARD PRESENT <b>YES</b>		HAZ. CARGO <b>YES</b>		HAZ. SPILL <b>NO</b>		HAZ. CARGO CODE <b>1203</b>		TYPE CARGO/COMMODITY <b>EMPTY GASOLINE</b>				NAS SAFETY REPORT # <b>KY0EE1000114</b>									
HM CLASS <b>CLASS 3 FLAMMABLE/COMBUSTIBLE LIQUID</b>										CARRIER TYPE <b>INTERSTATE CARRIER</b>															
SINGLE/COMBINATION/BOBTAIL <b>COMBINATION</b>		NO. AXLES <b>5</b>		NO. TRAILERS <b>1</b>		US DOT # <b>0129750</b>		ICC MC #		CRASH AVOIDANCE (Fatal Only) <b>OTHER AVOIDANCE MANUEVER</b>															
VEHICLE CONFIGURATION <b>TRACTOR/SEMI-TRAILER</b>						CARGO BODY TYPE <b>CARGO TANK</b>				BUS USE <b>NOT A BUS</b>															
GVWR TOTAL <b>MORE THAN 26,000 POUNDS</b>				MOTOR CARRIER NAME <b>CHILDERS TRANSPORT INC</b>						CARRIER NAME SOURCE <b>SINGLE STATE REGISTRATION</b>															
MOTOR CARRIER ADDRESS <b>PO BOX 430 WHITESBURG, KY 418580430</b>																									
VIOLATION CODES		CITATION NUMBER		CASE NUMBER		SUSPECTED DRINKING DRIVER <b>NO</b>		METHOD OF DETERMINATION <b>97 - OTHER</b>																	
TAKEN BY																									
TEST OFFERED <b>NO</b>		CHEMICAL TEST		TESTED FOR		SENT TO				RESULTS				PAGE											

## KENTUCKY UNIFORM POLICE TRAFFIC COLLISION REPORT - WITNESS

MASTER FILE # 70726064

INVESTIGATING AGENCY KY STATE POLICE, CVE

AGENCY ORI NUMBER 0370200

LOCAL CODE 200910669

WITNESS

MALE

DOB

FERGUSON, KY

WITNESS

DOB

WITNESS

DOB

WITNESS

DOB

WITNESS

DOB

WITNESS

DOB

WITNESS

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WITNESS

DOB

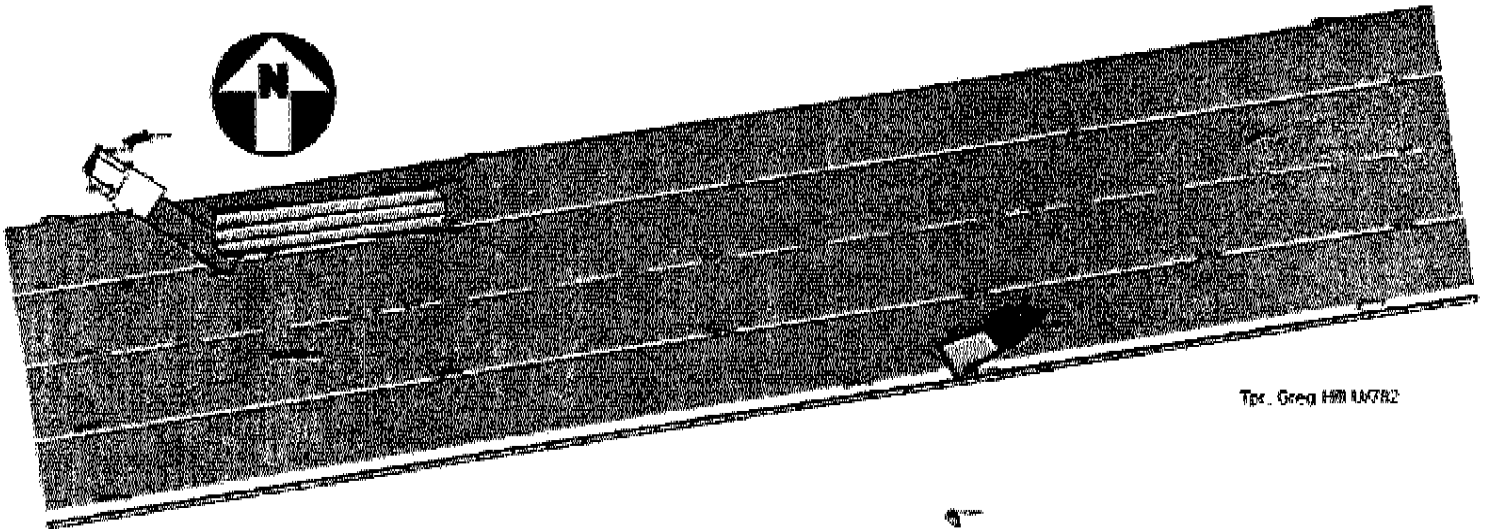
WITNESS

DOB

WITNESS

DOB

*Not To Scale*



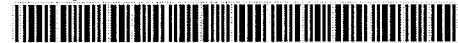
Tpr. Greg HOB 11/7/82



**Service of Process  
Transmittal**

06/14/2010

CT Log Number 516782018



**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 Kentucky**

**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], Individually and as Administratrix of the Estate of [REDACTED]  
Deceased and as Guardian of [REDACTED] a minor under the age of 18,  
Pltfs. vs. Shelly Napier, etc., et al., Dfts. and Shelly Napier, etc., Third Party Pltff.  
vs. Chrysler Group, LLC, Third Party Dft.  
*Name discrepancy noted.*

**DOCUMENT(S) SERVED:** Summons, Third Party Complaint

**COURT/AGENCY:** Clay County Circuit Court, KY  
Case # 09-CI-00319

**NATURE OF ACTION:** Product Liability Litigation - Manufacturing Defect - Wrong Death - Pertaining to  
defective steering linkage and/or other steering components of 2006 Dodge Ram  
pickup on 6/15/09

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Frankfort, KY

**DATE AND HOUR OF SERVICE:** By Regular Mail on 06/14/2010 postmarked on 06/11/2010

**APPEARANCE OR ANSWER DUE:** Within 20 days

**ATTORNEY(S) / SENDER(S):** Deborah R. Lewis  
Law Office of Deborah R. Lewis, P.L.L.C.  
PO Drawer 1179  
Hazard, KY 41702  
606-487-1234

**ACTION ITEMS:** SOP Papers with Transmittal, via Fed Ex 2 Day , 799453180148  
Image SOP

**SIGNED:** C T Corporation System  
**PER:** Anthony Romano  
**ADDRESS:** 306 W. Main Street  
Suite 512  
Frankfort, KY 40601  
**TELEPHONE:** 800-592-9023

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

JUN 17 2010

By WCS Mail/Reg. Agent/  
Sec. of State/Proc. Server

AOC-105  
Rev. 5-00

Summons Type: CI

Commonwealth of Kentucky  
Court of Justice

CR 4.02; CR Official Form 1



**CIVIL SUMMONS**

Case No. 09-CI-00319

Court CIRCUIT

County CLAY

SHERRY BAKER, INDIVIDUALLY AND AS ADMINISTRATRIX OF  
THE ESTATE OF JIMMIE DARRELL BAKER, DECEASED AND SHERRY  
BAKER, AS GUARDIAN OF MATTHEW BAKER, A MINOR UNDER THE  
AGE OF 18 VS. PLAINTIFF

SHELLY NAPIER, AS ADMINISTRATRIX OF THE ESTATE OF RICHARD  
NAPIER, DECEASED; NAPIER & SON TRUCKING, INC., NATIONWIDE  
AGRIBUSINESS INSURANCE COMPANY & AMERICAN COMMERCE  
INSURANCE COMPANYVS. VS.

SHELLY NAPIER, AS ADMINISTRATRIX OF THE ESTATE OF  
RICHARD NAPIER, DECEASED DEFENDANT  
VS. CHRYSLER GROUP, LLC

*Chrysler Group, LLC*  
CT CORPORATION SYSTEM  
306 WEST MAIN STREET, SUITE 512  
FRANKFORT, KENTUCKY 40601

THE COMMONWEALTH OF KENTUCKY  
TO THE ABOVE-NAMED DEFENDANTS:

You are hereby notified that a legal action has been filed against you in this court demanding relief as shown on the document delivered to you with this summons. Unless a written defense is made by you or by an attorney on your behalf and filed in the clerk's office within 20 days following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding such relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this summons.

Date: 6-11-10

Clerk: James S. Phillips

By: uk D.C.

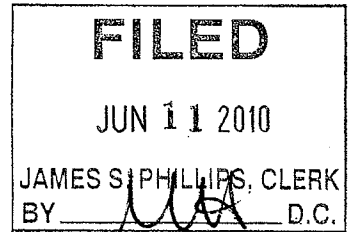
**PROOF OF SERVICE**

This summons was served by delivering a true copy and the complaint (or other initiating document) to:

This \_\_\_\_\_ day of \_\_\_\_\_,

Served By: \_\_\_\_\_

COMMONWEALTH OF KENTUCKY  
CLAY CIRCUIT COURT  
CIVIL ACTION NO: 09-CI-00319



SHERRY BAKER, INDIVIDUALLY AND  
AS ADMINISTRATRIX OF THE ESTATE  
OF JIMMIE DARRELL BAKER, DECEASED  
and SHERRY BAKER, AS GUARDIAN OF  
MATTHEW BAKER, A MINOR UNDER THE  
AGE OF 18

PLAINTIFFS

VS:

SHELLY NAPIER, AS ADMINISTRATRIX OF  
THE ESTATE OF RICHARD NAPIER, DECEASED,  
NAPIER & SON TRUCKING, INC., NATIONWIDE  
AGRIBUSINESS INSURANCE COMPANY &  
AMERICAN COMMERCE INSURANCE COMPANY

DEFENDANTS

AND

SHELLY NAPIER, AS ADMINISTRATRIX OF  
THE ESTATE OF RICHARD NAPIER, DECEASED,

THIRD PARTY  
PLAINTIFF

VS:

CHRYSLER GROUP, LLC

THIRD PARTY  
DEFENDANT

Serve: CT Corporation System  
306 West Main Street  
Suite 512  
Frankfort, Kentucky 40601

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THIRD PARTY COMPLAINT

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Come now the Defendant/Third Party Plaintiff, Shelly Napier, as Administratrix of  
the Estate of Richard Napier, Deceased, by and through counsel, and for her Third Party

Complaint against Chrysler Group, LLC, states as follows:

(1) The Plaintiff, Sherry Baker, Individually and as Administratrix of the Estate of Jimmie Darrell Baker, Deceased and Sherry Baker, as Guardian of Matthew Baker, a Minor under the Age of 18, has filed a Complaint against the Defendant/Third Party Plaintiff, Shelly Napier, as Administratrix of the Estate of Richard Napier, Deceased, a copy of which is attached hereto as Exhibit A.

(2) In the attached Complaint, the Plaintiff has alleged that Jimmie Darrell Baker was operating a motor vehicle which was struck by a motor vehicle operated by the Richard Napier, on or about June 15, 2009; the Plaintiff has further alleged that Richard Napier, was negligent in the operation of his vehicle and that Jimmie Darrell Baker died as a result thereof.

(3) The Defendant/Third Party Plaintiff, Shelly Napier, as Administratrix of the Estate of Richard Napier, Deceased, has denied certain allegations complained of by the Plaintiff in her Answer heretofore filed and tendered to the Court.

(4) The Third Party Defendant, Chrysler Group, LLC, is a foreign limited liability company doing business in Kentucky and its registered agent for service of process is C.T. Corporation System, 306 West Main Street, Suite 512, Frankfort, Kentucky 40601.

(5) On or about June 15, 2009, Richard Napier was operating a 2006 Dodge Ram pickup manufactured by the Third Party Defendant, Chrysler Group, LLC, on the Hal Rogers Parkway in Clay County, Kentucky.

(6) The steering linkage and/or other steering components in the aforesaid 2006 Dodge Ram pickup as designed, manufactured, constructed, assembled, inspected, tested, packaged, labeled, distributed, marketed, and sold were defective and unreasonably

dangerous which caused the motor vehicle driven by Richard Napier to collide with a motor vehicle operated by Jimmie Darrell Baker, resulting in the death of both; the negligent actions of Chrysler Group, LLC, caused and/or contributed to cause and/or bring about the accident and damages for which the Plaintiff complains.

(7) The Plaintiff complains of the aforesaid damages and said collision and seeks recovery of said damages from the Defendant/Third Party Plaintiff.

(8) In the event that the Plaintiff secures judgment against the Defendant/Third Party Plaintiff, which the Defendant/Third Party Plaintiff denies, then the Defendant/Third Party Plaintiff is entitled to apportionment from the Third Party Defendant, Chrysler Group, LLC.

(9) The Defendant/Third Party Plaintiff specifically reserves the right to amend her Third Party Complaint to assert claims for personal injury and wrongful death.

**WHEREFORE**, the Defendant/Third Party Plaintiff, Shelly Napier, as Administratrix of the Estate of Richard Napier, Deceased, prays as follows:

- (1) In the event the Plaintiff secures a Judgment against her, then in that event, the Defendant/Third Party Plaintiff is entitled to a Judgment against the Third Party Defendant, Chrysler Group, LLC, for the full amount of said Judgment, or in apportion to the negligence of the Third Party Defendant as may be determined in this proceeding;
- (2) Judgment against the Third Party Defendant, Chrysler Group, LLC, for any and all payments heretofore or hereafter made by the Defendant/Third Party Plaintiff as a result of the motor vehicle accident of June 15, 2009;
- (3) For a trial by Jury; and

(4) Any and all relief she may be entitled.

LAW OFFICE OF  
DEBORAH R. LEWIS, P.L.L.C.  
POST OFFICE DRAWER 1179  
HAZARD, KENTUCKY 41702  
PHONE: (606) 487-1234  
COUNSEL FOR DEFENDANTS/  
THIRD PARTY PLAINTIFFS,  
SHELLY NAPIER, AS  
ADMINISTRATRIX OF THE ESTATE  
OF RICHARD NAPIER, DECEASED,  
AND NAPIER & SON TRUCKING,  
INC.

BY:   
DEBORAH R. LEWIS

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**CERTIFICATE OF SERVICE**

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This is to certify that the foregoing has been served by mailing a true copy thereof,  
postage prepaid, on this the 11<sup>th</sup> day of June, 2010, to the following:

James D. Holliday, Esq.  
109 Broadway  
Post Office Box 29  
Hazard, Kentucky 41702-0029

J. Dale Golden, Esq.  
Golden & Walters  
771 Corporate Drive, Suite 905  
Lexington, Kentucky 40503-5444

Jane Higgins, Esq.  
Phillips Parker Orbersen & Moore P.L.C.  
163 East Main Street, Suite 130  
Lexington, Kentucky 05074

W. Barry Lewis, Esq.  
Lewis and Lewis Law Offices  
Post Office Box 800  
Hazard, Kentucky 41702-0800

**With Original To:**

Clay Circuit Clerk  
James S. Phillips  
316 Main Street, Suite 108  
Manchester, Kentucky 40962

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**DEBORAH R. LEWIS**

Third Party Complaint.wpd

209045683

State of Nebraska  
Investigator's Motor Vehicle Accident Report

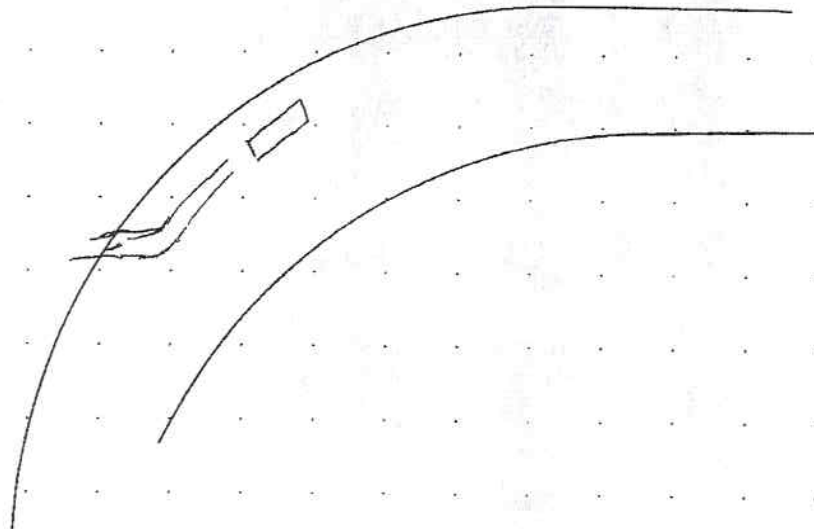
Sheet 1 of 1

001	Total Number of Vehicles	Local No./ District	Agency Case No.	HIT & RUN? <input type="radio"/> YES <input checked="" type="radio"/> NO	INVESTIGATION MADE AT SCENE? <input checked="" type="radio"/> YES <input type="radio"/> NO	L 1
A1	DATE OF ACCIDENT	M M / D D / Y Y Y Y S M T W T H F S		TIME OF ACCIDENT	STATE USE ONLY	
A2	PLACE OF ACCIDENT	COUNTY	CITY	POLICE NOTIFIED	LATITUDE	
B	ROAD ON WHICH ACCIDENT OCCURRED	STREET/ HIGHWAY NO.		ONE-WAY STREET?	LONGITUDE	
C	DISTANCE FROM MILEPOST	FEET	N S E W OF MILEPOST	HIGHWAY NO.	SHOULD LOCATION HAVE ENGINEERING STUDY? <input type="radio"/> YES <input checked="" type="radio"/> NO	
D	IF AT INTERSECTION		IF NOT AT INTERSECTION			
6	NAME OF INTERSECTING ROADWAY		OF NEAREST STREET, BRIDGE, RAILROAD CROSSING			
V1/M	IF ACCIDENT WAS OUTSIDE CITY LIMITS, INDICATE DISTANCE FROM NEAREST TOWN					
V2/M	MILES	N S E W	AND MILES	N S E W	CITY OR TOWN	
E	R. WORK ZONE CODES	R1 R2 R3 R4	S. PEDESTRIAN CLASSIFICATION CODES	S1 S2 S3 S4 S5-a S5-b S6-a S6-b	DOES ACCIDENT INVOLVE DAMAGE TO STATE DEPT. OF ROADS/ PROPERTY? <input type="radio"/> YES <input checked="" type="radio"/> NO	
F	VEHICLE NO. 1					
1	DRIVER LICENSE	NO.	STATE (Of License)	NE	SEX	<input type="radio"/> FEMALE <input checked="" type="radio"/> MALE
V1/N	DRIVER		PHONE	LOCAL NO.	DATE OF BIRTH (MM / DD / YYYY)	
V2/N	DRIVER ADDRESS		CITY, STATE, ZIP	LOCAL NO.	CITATION	
G	OWNER		PHONE	LOCAL NO.	CITATION NO.	
2	OWNER ADDRESS		CITY, STATE, ZIP	LOCAL NO.	CITATION NO.	
H	LICENSE PLATE	TF	NO.	YEAR (Plate Expires)	2010	STATE (Of Plate)
V1/O	VEHICLE	YEAR	MAKE	MODEL	BODY STYLE	COLOR
4	VEHICLE ID NO. (V/N)	3D6WH46A87G	Dodge	Ram Truck 350	Pickup truck	WHI
V2/O	TOWED TO	Home of Owner	TOWED BY	Sinners of Wauneta	ESTIMATED DAMAGE	<input checked="" type="radio"/> TOTAL \$ Total
I	VEHICLE NO. 2					
1	DRIVER LICENSE	NO.	STATE (Of License)	NE	SEX	<input type="radio"/> FEMALE <input checked="" type="radio"/> MALE
V1/P	DRIVER		PHONE	LOCAL NO.	DATE OF BIRTH (MM / DD / YYYY)	
V2/P	DRIVER ADDRESS		CITY, STATE, ZIP	LOCAL NO.	CITATION	
J	OWNER		PHONE	LOCAL NO.	CITATION NO.	
01	OWNER ADDRESS		CITY, STATE, ZIP	LOCAL NO.	CITATION NO.	
V1/Q	LICENSE PLATE	NO.	YEAR (Plate Expires)	STATE (Of Plate)	ESTIMATED DAMAGE	
V2/Q	VEHICLE	YEAR	MAKE	MODEL	BODY STYLE	COLOR
K	VEHICLE ID NO. (V/N)	TOWED TO	TOWED BY	POLICY NO.	ESTIMATED DAMAGE	
01	TOWED TO		TOWED BY	POLICY NO.	ESTIMATED DAMAGE	
Complete this section for all injured persons (Complete a continuation report, if more than three were injured)						
VEH. #	NAME	ADDRESS	DATE OF BIRTH (MM / DD / YYYY)	1	2	3
1	NAME	ADDRESS	DATE OF BIRTH (MM / DD / YYYY)	1	2	3
LOCAL NO.	MEDICAL FACILITY NAME	EMS SERVICE NAME	EMS RUN REPORT NO.	4	5	SEX
VEH. #	NAME	ADDRESS	DATE OF BIRTH (MM / DD / YYYY)	1	2	3
1	NAME	ADDRESS	DATE OF BIRTH (MM / DD / YYYY)	1	2	3
LOCAL NO.	MEDICAL FACILITY NAME	EMS SERVICE NAME	EMS RUN REPORT NO.	4	5	SEX
VEH. #	NAME	ADDRESS	DATE OF BIRTH (MM / DD / YYYY)	1	2	3
1	NAME	ADDRESS	DATE OF BIRTH (MM / DD / YYYY)	1	2	3
LOCAL NO.	MEDICAL FACILITY NAME	EMS SERVICE NAME	EMS RUN REPORT NO.	4	5	SEX

## THE FOLLOWING INFORMATION IS REQUIRED FOR ALL ACCIDENTS

INDICATE BY DIAGRAM WHAT HAPPENED

AGENCY CASE NO.

Indicate  
North  
by Arrow

## DESCRIPTION OF ACCIDENT BASED ON OFFICER'S INVESTIGATION

Driver was going around curve and was unable to steer. The vehicle left the road going into the right hand ditch, marks show that the left front tire was not the same as the right and drag marks looked like the steering rod was dragging. The vehicle rolled over the edge of the ditch, caught and then rolled over onto its top.

41.000

PROPERTY	OBJECT DAMAGED	OWNER NAME	ADDRESS	PHONE ( )	APPROX. COST OF DAMAGE \$
	OBJECT DAMAGED	OWNER NAME	ADDRESS	PHONE ( )	APPROX. COST OF DAMAGE \$

WITNESSES	NAME	ADDRESS	PHONE ( )
	NAME	ADDRESS	PHONE ( )

VEHICLE MOVEMENT BEFORE COLLISION				POINT OF IMPACT AND MOST DAMAGED AREA (Enter numbers for each vehicle)				AIRBAG DEPLOYED VEHICLE 1				RESTRAINT USE VEHICLE 1				TOTAL OCCUPANTS			
VEH NO.	N	S	E	W	ROAD OR HIGHWAY NAME	VEHICLE 1		VEHICLE 2		VEHICLE 1		VEHICLE 1		VEH 1		VEH 2			
1			X		740A	POINT OF IMPACT	09	POINT OF IMPACT		1	Deployed - front	1	None used - vehicle occupant	ALCOHOL TESTING	Driver No. 1	Driver No. 2	Pedestrian		
2						MOST DAMAGED AREA	09	MOST DAMAGED AREA		4	2 Deployed - side	2	Lap & shoulder belt used	ALCOHOL LEVEL TESTED	Y	Y	Y		
1	06				06 Turning left						3 Deployed - both front/side	3	Shoulder belt only used	BAC LEVEL					
2					07 Making U-turn						4 Not deployed	4	Lap belt only used	ALCOHOL/DRUGS SUSPECTED	Driver No. 1	Driver No. 2			
					08 Entering traffic lane						5 Not applicable/No airbag available	5	Child safety seat used		1				
					09 Leaving traffic lane						6 No airbag available	6	Child booster seat used						
					10 Parked						7 DOT approved helmet used	7	DOT approved helmet used						
					11 Slowing or stopped in traffic						8 Costume helmet used	8	Costume helmet used						
					12 Other						9 Restraint use unknown	9	Restraint use unknown						
					13 Unknown														
OFFICER NO. 979					TROOP/TEAM/BEAT					DEPARTMENT 4300 Hayes County Sheriff Department					Photographs taken? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
INVESTIGATOR NAME (Print or Type) Thomas Dow					INVESTIGATOR SIGNATURE Digital Certificate with Nebraska Crime Commission					DATE OF REPORT 10/04/2009									

pu

FIELD COPY-NOT FROM CUSTODIAL FILES

Law Enforcement and TxDOT Use Only

☐ FATAL ☐ CMV ☐ SCHOOL BUS ☐ RAILROAD ☐ MAB ☐ SUPPLEMENT ☐ ACTIVE ☐ SCHOOL ZONE

Total Num. Units: 0, 0, 1  
 Total Num. Crashes: 0, 0, 1  
 TxDOT Crash ID: [blank]



Texas Peace Officer's Crash Report (Form CR-3 1/1/2010)  
 Mail to: Texas Department of Transportation, Crash Records, P.O. Box 148349, Austin, TX 78714  
 Refer to Attached Code Sheet for Numbered Fields

Page 1 of 2

\* These fields are required on all additional sheets submitted for this crash (ex: additional vehicles, occupants, injured, etc.).

*Crash Date (MM/DD/YYYY) 0, 5 / 1, 5 / 2, 0, 1, 0		*Crash Time (24HRMM) 1, 7, 0, 0		Case ID		Local Use	
*County Name Smith				*City Name		<input checked="" type="checkbox"/> Outside City Limit	
In your opinion, did this crash result in at least \$1,000 damage to any one person's property?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Latitude (decimal degrees) 3, 2, ., 5, 5, 8, 1, 8		Longitude (decimal degrees) - 0, 9, 5, ., 3, 5, 5, 0, 6	
ROAD ON WHICH CRASH OCCURRED							
*1 Rwy. Sys. CR		*Hwy. Num. 452		2 Rwy. Part 1		3 Street Prefix	
<input type="checkbox"/> Crash Occurred on a Private Drive or Road/Private Property/Parking Lot		<input type="checkbox"/> Toll Road/Toll Lane		Speed Limit 45		Const. Zone <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<input type="checkbox"/> Workers Present		<input checked="" type="checkbox"/> No		Street Name		4 Street Suffix	
INTERSECTING ROAD, OR IF CRASH NOT AT INTERSECTION, NEAREST ROAD OR REFERENCE MARKER							
At Int. <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No		1 Rwy. Sys. FM		Hwy. Num. 2710		2 Rwy. Part	
Distance from Int. or Ref. Marker 1		<input type="checkbox"/> FT <input checked="" type="checkbox"/> MI		3 Dir. From Int. or Ref. Marker S		Reference Marker	
Street Name		Street Name		Street Name		4 Street Suffix	
Unit Num. 1		5 Unit Desc. 1		<input type="checkbox"/> Parked Vehicle <input type="checkbox"/> Hit and Run		LP State TX	
Veh. Year 2, 0, 0, 8		6 Veh. Color WHI		Veh. Make DODGE		Veh. Model 3500	
8 DLID Type 1		DLID State TX		DLID Num. [blank]		9 DL Class B	
Address (Street, City, State, ZIP)		TYLER, TX		10 COI End 96		11 DL Rest 96	
DOB (MM/DD/YYYY) 0, 3 / 1, 1 / 1, 9, 8, 5		7 Body Style PK		<input type="checkbox"/> Not Applicable - Alcohol and Drug Results are only reported for Driver/Primary Person for each Unit.		8 Driver's License (Explain in Narrative if checked)	
Person Num. 1		12 Person Type 1		13 Seat Position 1		Name: Last, First, Middle	
Enter Driver or Primary Person for this Unit on first line		14 Injury Severity N		15 Age 45		16 Sex W	
17 Effect 1		18 Rest. 1		19 A/Ring 1		20 Helmet 97	
21 Sol. N		22 Alc. Spec. 96		Alc. Result		23 Drug Spec. 96	
24 Drug Result 97		25 Drug Category 97		26 Drug Result		27 Drug Category	
<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Lessee		Owner/Lessee Name & Address		TYLER, TX		Fin. Resp. Num.	
Proof of Fin. Resp. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Expired <input type="checkbox"/> Exempt		28 Fin. Resp. Type 2		Fin. Resp. Name AMERICAN FIRST INS CO.		Fin. Resp. Num.	
Fin. Resp. Phone Num.		27 Vehicle Damage Rating 1		F, R, 3		27 Vehicle Damage Rating 2	
Towed by FOSHEE WRECKER		Towed to		US 69 LINDALE TX 75771 OR		Vehicle Inventory <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Unit Num. 5		5 Unit Desc. [blank]		<input type="checkbox"/> Parked Vehicle <input type="checkbox"/> Hit and Run		LP State	
Veh. Year [blank]		6 Veh. Color [blank]		Veh. Make [blank]		Veh. Model [blank]	
8 DLID Type [blank]		DLID State [blank]		DLID Num. [blank]		9 DL Class [blank]	
Address (Street, City, State, ZIP)		[blank]		10 COI End [blank]		11 DL Rest [blank]	
DOB (MM/DD/YYYY) [blank]		7 Body Style [blank]		<input type="checkbox"/> Not Applicable - Alcohol and Drug Results are only reported for Driver/Primary Person for each Unit.		8 Driver's License (Explain in Narrative if checked)	
Person Num. [blank]		12 Person Type [blank]		13 Seat Position [blank]		Name: Last, First, Middle	
Enter Driver or Primary Person for this Unit on first line		14 Injury Severity [blank]		15 Age [blank]		16 Sex [blank]	
17 Effect [blank]		18 Rest. [blank]		19 A/Ring [blank]		20 Helmet [blank]	
21 Sol. [blank]		22 Alc. Spec. [blank]		Alc. Result [blank]		23 Drug Spec. [blank]	
24 Drug Result [blank]		25 Drug Category [blank]		26 Drug Result [blank]		27 Drug Category [blank]	
<input type="checkbox"/> Owner <input type="checkbox"/> Lessee		Owner/Lessee Name & Address		[blank]		Fin. Resp. Num.	
Proof of Fin. Resp. <input type="checkbox"/> Yes <input type="checkbox"/> Expired <input type="checkbox"/> Exempt		28 Fin. Resp. Type [blank]		Fin. Resp. Name [blank]		Fin. Resp. Num.	
Fin. Resp. Phone Num. [blank]		27 Vehicle Damage Rating 1 [blank]		27 Vehicle Damage Rating 2 [blank]		Vehicle Inventory <input type="checkbox"/> Yes <input type="checkbox"/> No	
Towed by [blank]		Towed to [blank]		[blank]		[blank]	

Law Enforcement and TxDOT Use ONLY Form CR-2 1/14/2010		Case ID	TxDOT Crash ID	Page <u>2</u> of <u>2</u>									
DISPOSITION OF MAJOR UNCONTROLLED	Unit Num.	Prsn Num.	Taken To	Taken By	Date of Death (MM/DD/YYYY)	Time of Death (24-HRMM)							
CHARGES	Unit Num.	Prsn Num.	Charge	Citation/Reference Num.									
DAMAGE	Damaged Property Other Than Vehicles		Owner's Name	Owner's Address									
CARRIER	Unit Num.	<input type="checkbox"/> 10,001+ LBS.	<input type="checkbox"/> TRANSPORTING HAZARDOUS MATERIAL	<input type="checkbox"/> 5+ Capacity	28 Veh Oper.	28 Carrier ID Type	Carrier ID Num.						
	Carrier's Comp. Name	Carrier's Primary Addr.											
	30 Rmwy. Access	31 Veh Type	<input type="checkbox"/> RGWV <input type="checkbox"/> GVWR	HazMat Released <input type="checkbox"/> Yes <input type="checkbox"/> No	32 HazMat Class Num.	HazMat ID Num.	32 HazMat Class	32 HazMat ID Num.					
	33 Cargo Body Style	Trailer 1 Unit Num.	<input type="checkbox"/> RGWV <input type="checkbox"/> GVWR	34 Trl Type	Trailer 2 Unit Num.	<input type="checkbox"/> RGWV <input type="checkbox"/> GVWR	34 Trl Type						
	35 Seq. 1	35 Seq. 2	35 Seq. 3	35 Seq. 4	Total Num. Axles	Total Num. Tires							
FACTORS & CONDITIONS	36 Contributing Factors (Investigator's Opinion)		37 Vehicle Defects (Investigator's Opinion)		Environmental and Roadway Conditions								
	Unit Num.	Contributing	May Have Contrib.	Unit Num.	Contributing	May Have Contrib.	38 Weather cond.	39 Light Cond.	40 Entering Rmwy.	41 Roadway Type	42 Roadway Alignment	43 Surface Condition	44 Traffic Control
	1			11			1	1	97	1	2	1	96
NARRATIVE AND DIAGRAM	Investigator's Narrative Opinion of What Happened (Attach Additional Sheets if Necessary)						Field Diagram - Not to Scale						
	UNIT #1 NB CR 452 WHEN SOMETHING IN STEERING MECHANISM BROKE. DUE TO NOT HAVING STEERING THE VEHICLE RUNS OFF ROADWAY STRIKING EMBANKMENT.						<div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 5px; margin-right: 10px;">                     Indicate North  </div> </div>						
INVESTIGATOR	Time Notified (24HRMM)		How Notified		Time Arrived (24HRMM)		Report Date (MM/DD/YYYY)						
	1, 7, 0, 5		DPS COMMUNICATIONS		1, 7, 2, 0		0, 5, 1, 5, 1, 2, 0, 1, 0						
	Invest. Comp. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Investigator Name (Printed)			ID Num.								
OR Num.		*Agency		District Area									
T, X, D, P, S, 5, 5, 0, 0		Texas Department of Public Safety-Highway Patrol		H, P, 1, 5, 0, 1									

PAGE 01/04

STATE OF LOUISIANA  
UNIFORM MOTOR VEHICLE TRAFFIC CRASH REPORT

090614220705221

NAME OF AGENCY		TIME OF NOTIFICATION	TIME OF ARRIVAL	TIME ALL LANES OPENED
[REDACTED]		2222	2231	0011
INVESTIGATOR COMPLETE	y/n <input checked="" type="checkbox"/> INVESTIGATING POLICE AGENCY <input checked="" type="checkbox"/> A. STATE R. CITY C. RURAL Z. OTHER	DATE REPORT COMPLETED		
[REDACTED]	SIGNATURE	DP219		SUPERVISOR'S INITIALS OR BADGE
INVESTIGATING OFFICER'S NAME (PRINT)		BADGE #		
CPSP 1101 (REV. JAN. 2008)				

06/25/2009 12:55 3188724289

DPSP

PAGE 02/04

Original Locked Report

090614220705221

COMPUTER NUMBER

PAGE #

02

STATE OF LOUISIANA  
UNIFORM MOTOR VEHICLE TRAFFIC CRASH REPORT  
VEHICLE/PEDESTRIAN

1 VEH OR PEDESTRIAN

CONF CARGO BODY TYPE YEAR MAKE MODEL # DOORS # AXLES # TIRES  
D Z see page 1 for selections 2006 DODGE PK 4 4 14

VIN 3D7MX48C46G VEHICLE TOWED A YES B NO C LEFT AT SCENE REMOVED BY NASH

YEAR STATE NUMBER TYPE 2009 LA F549499 FARM 0 REASON TOWED A VEHICLE DAMAGE B DRIVER ARRESTED C INSURANCE VOUCHER Z OTHER A

YEAR MAKE TYPE YEAR STATE NUMBER 2008 PJTM 9999 LA

VEHICLE CLASSIFICATION COMMERCIAL BUSINESS VEHICLE GOVERNMENT VEHICLE PERSONAL VEHICLE X

COMPLETE INFORMATION BELOW IF THIS VEHICLE IS BEING USED FOR COMMERCIAL/BUSINESS PURPOSES. IF A MOTORCYCLE, EXCEPT 50 CC, 100 CC, 150 CC, OR HAS A HAZARD PLACARD, OR IS A BUS WITH SEATING FOR NINE OR MORE, INCLUDE THE DRIVER.

CARRIER NAME HOME (TOLL)

STREET ADDRESS CITY STATE ZIP

INTERSTATE CARRIER Y/N TRANSPORTING HAZARDOUS MATERIAL Y/N CLASS OR PLACARD DISPLAYED Y/N HAZ MAT RELEASED Y/N

NAME (LAST, FIRST, MI) OF DRIVER PEDESTRIAN

STREET ADDRESS TELEPHONE #

CITY FRIERSON STATE LA ZIP

STATE CLASS ENDORSEMENTS DRIVER'S LICENSE NUMBER 1A E

REJECTED TO CHANGE INFORMATION? Y/N NAME OF FACILITY

PEDESTRIAN ONLY UPPER BODY CLOTHING LIGHT DARK LOWER BODY CLOTHING LIGHT DARK SEX RACE AGE INJURY CODE

OWNER'S NAME (LAST, FIRST, MI OR COMPANY NAME)

X STREET ADDRESS TELEPHONE #

STREET ADDRESS

CITY FRIERSON STATE LA ZIP

INSURANCE CO. NAME ANPAC LOUIS INS CO POLICY NUMBER EXPIRATION DATE

AGENT'S NAME/ADDRESS ALLISON HOLLEY 7330 FERN AVE STE 604 SHRE PHONE 318-797-0747

SEATING POSITION	EJECTION	TRAPPED OR EXTRICATED	AIRBAG	OCCUPANT PROTECTION SYSTEM USED	INJURY
A - FRONT SEAT-LEFT SIDE (MOTORCYCLE DRIVER)	J - SURVIVOR EJECTION OF GAS (TRUCK)	A - NOT EJECTED	A - DEPLOYED	A - NONE USED-VEHICLE OCCUPANT	A - FATAL
B - FRONT SEAT-MIDDLE	K - PASSENGER IN OTHER ENCLOSED PASSENGER OR CARGO AREA (NON-TRAILING UNIT)	B - TOTALLY EJECTED	B - NON DEPLOYED	B - SHOULDER BELT ONLY USED	B - INCAPACITATING/SEVERE
C - FRONT SEAT-RIGHT SIDE	L - PASSENGER IN OTHER UNENCLOSED PASSENGER OR CARGO AREA (NON-TRAILING UNIT)	C - PARTIALLY EJECTED	C - NON-DEPLOYED/SWITCH OFF	C - LAP BELT ONLY USED	C - NON-INCAPACITATING/MODERATE
D - SECOND SEAT-LEFT SIDE (MOTORCYCLE PASSENGER)	M - PASSENGER ON TRAIL OR OTHER UNIT	D - EJECTED	D - NOT APPLICABLE	D - SHOULDER AND LAP BELT USED	D - POSSIBLE/COMPLAINT
E - SECOND SEAT-MIDDLE	N - TRAILING UNIT	E - UNKNOWN	E - UNKNOWN	E - CHILD SAFETY SEAT IMPROPERLY USED	E - NO INJURY
F - SECOND SEAT-RIGHT SIDE	O - RIDING ON VEHICLE EXTERIOR (NON-TRAILING UNIT)	F - NOT EJECTED	F - NOT EJECTED	F - CHILD SAFETY SEAT USED	
G - THIRD ROW-LEFT SIDE (MOTORCYCLE PASSENGER)	P - UNKNOWN	G - TRAPPED/NOT EXTRICATED	G - NOT EJECTED	G - HELMET USED	
H - THIRD ROW-MIDDLE		H - TRAPPED/NOT EXTRICATED	H - NOT EJECTED	H - RESTRAINT USE UNKNOWN	
I - THIRD ROW-RIGHT SIDE		I - TRAPPED/NOT EXTRICATED	I - NOT EJECTED		

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Original Looked Report

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WRITE APPROPRIATE LETTER IN BLOCK

## CONTRIBUTING FACTORS AND CONDITIONS

<b>VISION</b> <b>OBSCUREMENTS</b> <b>N</b> A. RAIN, SNOW, ETC. ON WINDSHIELD B. WINDSHIELD OTHERWISE OBSCURED C. VISION OBSCURED BY LOAD D. TREES, BUSHES, ETC. E. BUILDING F. EMBANKMENT G. SIGN BOARD H. MOUNTAIN I. PARKED VEHICLES J. MOVING VEHICLES K. BLIND BY HEADLIGHTS L. BLIND BY SUNGLARE M. DISTRACTED BY NIGHT LIGHTS IN FIELD OF VIEW N. NO OBSCUREMENTS Y. UNKNOWN Z. OTHER		<b>CONDITION OF DRIVER/PEDESTRIAN</b> <b>A</b> A. NORMAL B. FATIGUED C. DISTRACTED D. LINGERED E. DISTRAINED F. APPARENTLY ASLEEP/BLACKOUT G. DRIVING ALCOHOL - IMPAIRED H. DRIVING ALCOHOL - NOT IMPAIRED I. DRUG USE - IMPAIRED J. DRUG USE - NOT IMPAIRED K. PHYSICAL IMPAIRMENT (EYES, EAR, LAMB) Y. UNKNOWN Z. OTHER		<b>SEQUENCE OF EVENTS/HARMFUL EVENTS</b> A. MOTOR VEHICLE IN TRANSPORT B. PARKED MOTOR VEHICLE C. STRUCK BY FALLING OBJECT D. CAUSE OR ANYTHING SET IN MOTION BY MOTOR VEHICLE E. WORK ZONE/INTERFERENCE EQUIPMENT F. OTHER NON-FIXED OBJECT G. COLLISION WITH FIXED OBJECT H. IMPACT ATTENUATOR/CUSHION I. BRIDGE OVERHEAD STRUCTURE J. BRIDGE PIER OR SUPPORT K. BRIDGE RAIL L. CURB M. DITCH N. EMBANKMENT O. GUARDRAIL RAIL P. GUARDRAIL END Q. CONCRETE TRAFFIC SUPPORT R. OTHER TRAFFIC SUPPORT S. TREE STANDING T. UTILITY TELEPHONE SUPPORT U. TRAFFIC SIGN SUPPORT V. TRAFFIC SIGNAL SUPPORT W. OTHER POST, POLE OR SUPPORT X. FENCE Y. MAILBOX Z. OTHER FIXED OBJECT (WALL, BUILDING, TUNNEL, ETC.) YV. UNKNOWN	
<b>VIOLATION</b> <b>U</b> A. EXCEEDING STATED SPEED LIMIT B. EXCEEDING SAFE SPEED LIMIT C. FAILURE TO YIELD D. FOLLOWING TOO CLOSELY E. DRIVING LEFT OF CENTER F. CUTTING IN, IMPROPER PASSING G. FAILURE TO SIGNAL H. MADE WIDE RIGHT TURN I. CUT CORNER ON LEFT TURN J. TURNED FROM WRONG LANE K. OTHER IMPROPER TURNING L. DISOBEYED TRAFFIC CONTROL M. IMPROPER STOPPING N. IMPROPER PARKING O. FAILED TO SET OUT FLAGS, FLARES P. FAILED TO DIM HEADLIGHTS Q. VEHICLE CONDITION R. DRIVER CONDITION S. CARELESS OPERATION T. IMPROPER BACKING U. NO VIOLATIONS Y. UNKNOWN Z. OTHER		<b>DRIVER DISTRACTION</b> <b>E</b> A. CELL PHONE B. OTHER ELECTRONIC DEVICE (PAGER, PALM PILOT, NAVIGATION DEVICE, ETC.) C. OTHER INSIDE THE VEHICLE D. OTHER OUTSIDE THE VEHICLE E. NOT DISTRACTED Y. UNKNOWN		<b>MOVEMENT PRIOR TO CRASH</b> <b>B</b> A. STOPPED B. PROCEEDING STRAIGHT AHEAD C. TRAVELING WRONG WAY D. BACKING E. CROSSED MEDIAN INTO OPPOSING LANE F. CROSSED CENTER LINE INTO OPPOSING LANE G. RAN OFF ROAD (NOT WHILE MAKING TURN AT INTERSECTION) H. CHANGING LANES ON MULTI-LANE ROAD I. MAKING LEFT TURN J. MAKING RIGHT TURN K. STOPPED PREPARING TO, OR MAKING U-TURN L. MAKING TURN, DIRECTION UNKNOWN M. STOPPED, PREPARING TO TURN LEFT N. STOPPED, PREPARING TO TURN RIGHT O. SLOWING TO MAKE LEFT TURN P. SLOWING TO MAKE RIGHT TURN Q. SLOWING TO STOP R. PROBABLY PARKED S. PARKING MANEUVER	
<b>TRAFFIC CONTROL</b> <b>Q</b> A. STOP SIGN B. YIELD SIGN C. RED SIGNAL ON D. YELLOW SIGNAL ON E. GREEN SIGNAL ON F. GREEN TURN ARROW ON G. RIGHT TURN ON RED H. LIGHT PHASE UNKNOWN I. FLASHING YELLOW J. FLASHING RED K. OFFICIAL FLAGMAN L. RR CROSSING, SIGN M. RR CROSSING, SIGNAL N. RR CROSSING, NO CONTROL O. WARNING SIGN (SCHOOL, ETC.) P. SCHOOL FLASHING SPEED SIGN Q. YELLOW NO PASSING LINE R. WHITE DASHED LINE S. YELLOW DASHED LINE T. BAYE LANE U. CROSSWALK V. NO CONTROL Y. UNKNOWN Z. OTHER		<b>REASON FOR MOVEMENT</b> <b>M</b> A. TO AVOID OTHER VEHICLE B. TO AVOID PEDESTRIAN C. TO AVOID ANIMAL D. TO AVOID OTHER OBJECT E. PASSING F. VEHICLE OUT OF CONTROL, NOT IN HAND G. VEHICLE OUT OF CONTROL, PASSING H. FOR TRAFFIC CONTROL I. DUE TO CONGESTION J. DUE TO PRIOR CRASH (COLLISION) K. DUE TO DRIVER CONDITION L. DUE TO DRIVER VIOLATION M. DUE TO VEHICLE CONDITION (FAILURE) N. DUE TO EQUIPMENT CONDITION O. HIGH WIND P. NORMAL MOVEMENT Y. UNKNOWN Z. OTHER		<b>VEHICLE CONDITION</b> <b>J</b> A. DEFECTIVE BRAKES B. DEFECTIVE HEADLIGHTS C. DEFECTIVE REAR LIGHTS D. DEFECTIVE SIGNAL LIGHTS E. ALL LIGHTS OUT F. DEFECTIVE STEERING G. TIRE FAILURE H. WORN OR SMOOTH TIRES I. SPOKE FAILURE J. DEFECTIVE SUSPENSION K. NO DEFECTS OBSERVED Y. UNKNOWN Z. OTHER	
<b>PEDESTRIAN ACTIONS</b> A. CROSSING, ENTERING ROAD AT INTERSECTION B. CROSSING, ENTERING ROAD NOT AT INTERSECTION C. WALKING IN ROAD - WITH TRAFFIC D. WALKING IN ROAD - AGAINST TRAFFIC E. SLEEPING IN ROADWAY F. STANDING IN ROADWAY G. GETTING ON OR OFF OTHER VEHICLE H. PUSHING, WORKING ON VEHICLE IN ROAD I. OTHER WORKING IN ROADWAY J. PLAYING IN ROADWAY K. NOT IN ROADWAY Y. UNKNOWN Z. OTHER		<b>VEHICLE LIGHTING</b> <b>A</b> A. HEADLIGHTS ON B. HEADLIGHTS OFF C. DAYTIME RUNNING LIGHTS Y. UNKNOWN		<b>ALCOHOL/DRUG INVOLVEMENT</b> <b>A</b> ALCOHOL/DRUGS SUSPECTED A. NEITHER ALCOHOL NOR DRUGS B. YES-ALCOHOL C. YES-DRUGS D. YES-ALCOHOL AND DRUGS Y. UNKNOWN ALCOHOL A. TEST REFUSED B. NO TEST GIVEN C. TEST GIVEN, RESULTS PENDING D. TEST GIVEN, SAC DRUGS A. TEST NOT GIVEN B. TEST GIVEN, RESULTS PENDING C. TEST REFUSED D. DRUGS REPORTED (SPECIFY IN NARRATIVE)	
<b>TRAFFIC CONTROL CONDITIONS</b> <b>A</b> A. CONTROLS FUNCTIONING B. CONTROLS NOT FUNCTIONING C. CONTROLS OBSCURED D. LANE MARKING UNCLEAR OR DEFECTIVE E. NO CONTROLS Y. UNKNOWN		<b>ALCOHOL/DRUG INVOLVEMENT</b> <b>B</b> ALCOHOL/DRUGS SUSPECTED A. NEITHER ALCOHOL NOR DRUGS B. YES-ALCOHOL C. YES-DRUGS D. YES-ALCOHOL AND DRUGS Y. UNKNOWN ALCOHOL A. TEST REFUSED B. NO TEST GIVEN C. TEST GIVEN, RESULTS PENDING D. TEST GIVEN, SAC DRUGS A. TEST NOT GIVEN B. TEST GIVEN, RESULTS PENDING C. TEST REFUSED D. DRUGS REPORTED (SPECIFY IN NARRATIVE)		<b>ALCOHOL/DRUG INVOLVEMENT</b> <b>A</b> ALCOHOL/DRUGS SUSPECTED A. NEITHER ALCOHOL NOR DRUGS B. YES-ALCOHOL C. YES-DRUGS D. YES-ALCOHOL AND DRUGS Y. UNKNOWN ALCOHOL A. TEST REFUSED B. NO TEST GIVEN C. TEST GIVEN, RESULTS PENDING D. TEST GIVEN, SAC DRUGS A. TEST NOT GIVEN B. TEST GIVEN, RESULTS PENDING C. TEST REFUSED D. DRUGS REPORTED (SPECIFY IN NARRATIVE)	

DIRECTION BEFORE CRASH		FINAL LOCATION OF VEHICLE	DISTANCE TRAVELED AFTER IMPACT	SPEED		SKIDMARK DATA (FEET)			
HEADED	ON HIGHWAY, STREET OR DRIVE			PRE	POSTED	FR	FL	RR	RL
N NE SW	B/W FRIERSON RD	OFF ROADWAY			0		0	0	0

DAMAGE TO VEHICLE	
AREA DAMAGED N-UNDER CARRIAGE D-TOTAL P-OTHER Y-NONE Z-UNKNOWN	EXTENT OF DEFORMITY A-NONE B-VERY MINOR C-MINOR D-MINOR/MODERATE E-MODERATE F-MODERATE/SEVERE G-SEVERE H-VERY SEVERE Y-UNKNOWN

QUANTITY	VEH. PED.	R.S. OR ORD. NO.
	<input type="checkbox"/>	
	<input type="checkbox"/>	
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NOTICE OF INSURANCE VIOLATION ☐

DPSP 6108

INVESTIGATING OFFICER'S INITIALS

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Original Locked Report

OFFICER'S NARRATIVE: DESCRIBE ANY UNUSUAL CIRCUMSTANCES ASSOCIATED WITH CRASH, INCLUDING OFFICER'S OBSERVATIONS AND OPINIONS.  
INCLUDE WITNESS NAMES, ADDRESSES, PHONE NUMBERS, ETC.

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IF NECESSARY, INDICATE DAMAGE TO PUBLIC OR PRIVATE PROPERTY WITH OWNER'S NAME & ADDRESS AT THE END OF THE NARRATIVE.

REFER TO EACH BY VEHICLE NUMBER

THE DRIVER OF VEHICLE #1 STATED THAT HE WAS TRAVELING ON STONEWALL - FRIERSON RD WHEN HIS VEHICLE STARTED TO SHAKE AND THEN THE VEHICLE SHOT OFF THE ROAD AND HIT A TREE.

NON-COLLISION WITH MOTOR VEHICLE	REAR END	HEAD-ON	THREAT ANGLE	LEFT TURN	LEFT TURN	LEFT TURN	RIGHT TURN	RIGHT TURN	SIDEWIDE TRAFFIC	SIDEWIDE OPPOSITE	OTHER	MANNER OF COLLISION
A	B	C	D	E	F	G	H	I	J	K	L	
<p>NOT TO SCALE</p> <p>STONEWALL-FRIERSON RD</p> <p>TREE LINE</p> <p>FENCE</p> <p>← N →</p>												

PE11-009

CHRYSLER

7-13-2011

Enclosure 2

Field Data

Legal Summaries - Peer

<b>MATTER #</b>	1208497
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19222065
<b>DATE OF INCIDENT</b>	01/07/2010
<b>DATE OF NOTICE</b>	01/08/2010
<b>MODEL/MODEL YEAR</b>	2005 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28C65G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	95,196
<b>OWNER</b>	[REDACTED] Shelocta, PA [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Tie Rods / Drag Links: Broke
<b>DESCRIPTION</b>	Owner claims tie rod end broke causing accident. Owner was not driving the vehicle. Driver, Stanley Riggle, stated he was cresting a small hill on a crowned dirt road at 30-35 MPH when he heard a snap and could no longer steer the vehicle. The vehicle veered off the right side of the road making contact with a telephone pole. Owner stated Recall H46 was completed approximately 5,000 miles prior to this incident.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> that the tie rods showed fatigue. Vehicle was involved in Recall H46 which was completed on this vehicle on 6/23/09.

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<sup>1</sup> 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.

<b>MATTER #</b>	1210350
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19354907
<b>DATE OF INCIDENT</b>	2/10/2010
<b>DATE OF NOTICE</b>	03/01/2010
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Mega Cab 4x4
<b>VIN</b>	3D7KS29D16G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	48,238
<b>OWNER</b>	[REDACTED] Westminster, MD [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Tie Rods / Drag Links
<b>DESCRIPTION</b>	Owner stated his wife was driving when the left front tie rod broke. Driver said she was turning to the left, when the left front wheel broke loose. The truck slid around to the right and hit a tree. Owner said the vehicle had the front end over-haul only 10 months prior.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> that the left front under carriage was damaged. The left tie rod was broken off at the steering arm. The broken steering arm was pushed upward and into the left front tire. The vehicle was involved in Recall H46, which was incomplete at time of incident.

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<sup>1</sup> 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.

<b>MATTER #</b>	1214129
<b>FILE TYPE</b>	Lawsuit
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	None
<b>DATE OF INCIDENT</b>	06/15/2009
<b>DATE OF NOTICE</b>	06/15/2010
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28C16G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	Unknown
<b>OWNER</b>	[REDACTED] [REDACTED]
<b>COURT</b>	MANCHESTER, KY [REDACTED] Circuit Court, Clay County, KY
<b>DOCKET #</b>	09CI00319
<b>ALLEGED DEFECT</b>	Steering: Linkage: Recall/Campaign
<b>DESCRIPTION</b>	[REDACTED] was driving the subject Dodge Ram truck eastbound on Hal Rogers Parkway in eastern Kentucky when, for reasons unknown, his vehicle crossed the centerline and collided head-on with a large commercial oil truck being driven westbound by Jimmie Darrell Baker. Upon impact, both trucks burst into flames. Mr. [REDACTED] died in the resulting blaze. Mr. [REDACTED] who was not wearing a seat belt, was ejected from the Dodge Ram truck and also died at the scene.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	2
<b>ANALYSIS</b>	The subject vehicle was destroyed several months after the accident and before the lawsuit was filed. Chrysler did not have the opportunity to inspect the subject vehicle. The subject vehicle was included among the H46 recall population, but there is no evidence that the subject vehicle was equipped with the cross-car steering linkage that was the subject of the H46 recall.

<b>MATTER #</b>	1209828
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19324067
<b>DATE OF INCIDENT</b>	02/16/2010
<b>DATE OF NOTICE</b>	02/17/2010
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	1D7KS28A57 [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	81,364
<b>OWNER</b>	[REDACTED] Berea, OH [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage: Broke
<b>DESCRIPTION</b>	Driver of the truck, [REDACTED], stated that prior to the incident he noticed that the vehicles steering felt sloppy with an audible clunk. One day prior to the incident he took the truck to a dealer stating his steering concern. He did not have the dealer diagnose the vehicle because the dealer was going to charge him a diagnostic inspection fee which he felt that was not correct because the truck had a prior steering related recall. [REDACTED] stated that on the day of the incident, he was attempting to make a right turn when the steering linkage broke, which caused him to lose control and proceed through the intersection. [REDACTED] says he inspected the steering linkage and determined that the right tie rod to knuckle joint had separated causing the incident. He purchased all the steering related parts and replaced them himself.
<b>CRASH</b>	No
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> that the right side tie rod assembly and dampener were replaced prior to inspection by Mr. [REDACTED]. Inspection of the steering linkage assembly with the recently replaced parts did not reveal any loose or worn connections. No impact damage detected to the right or left front wheel/tire assemblies or to the replaced tie rod.

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<sup>1</sup> 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.

Inspection of replacement steering parts indicated that the right outer tie rod end ball joint separated from its mounting. It appears that the steering dampener shaft was damage as a result of the tie rod separation. The truck had been inspected on 9/24/09 regarding Recall H46 at 65,161 miles.

<b>MATTER #</b>	1187094
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	17005038
<b>DATE OF INCIDENT</b>	12/04/2007
<b>DATE OF NOTICE</b>	12/05/2007
<b>MODEL/MODEL YEAR</b>	2005 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MS48C55G797596
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	61,858
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Broken Bow, OK [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Tie Rod: Broke
<b>DESCRIPTION</b>	Owner/driver stated a tie rod broke and caused an accident. He originally stated he was going about 4 mph when the vehicle started vibrating and he slowed because he thought that he had a flat. The vehicle swerved to the right, went off the road and hit a tree. He was knocked unconscious. When interviewed later, he stated he had just gone through a school zone and was getting up to speed when he felt a severe vibration in the front of the vehicle. Said he was going about 40 MPH so he let off the gas and stepped on the brakes, but they did not work and he went across the oncoming lane of traffic into a ditch and hit a tree.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> that both front tires were flat. The left front tire was pushed back in the wheel opening and the front was turned outward, and the inside edge of the rim was bent. The right front tire was also turned outward in the front. No holes or significant cuts were found in the nearly new front tires. The outer drag link end was separated from the right front knuckle. The ball was still attached to the knuckle and the socket was found packed with dirt. There was

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<sup>1</sup> 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.

some grease on the ball and some in the socket under the packed dirt. It has no grease fitting in it and there were scrape marks on the bottom. The outer drag link adjuster tube was broken at the outer clamp, with one piece remaining on the outer drag link and the other on the inner tie rod end. The steering damper rod was separated from the damper.

<b>MATTER #</b>	1216673
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	20022293
<b>DATE OF INCIDENT</b>	10/6/2010
<b>DATE OF NOTICE</b>	10/7/2010
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	1D7KS28C26[REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	76,806
<b>OWNER</b>	[REDACTED] Canton, MI [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Tie Rods / Drag Links: Broke
<b>DESCRIPTION</b>	Owner, [REDACTED] claimed he lost control of the truck because the tie rod end came off. He claimed he took the truck to a dealer 800 miles prior complaining of looseness in the front end and the dealer said there was nothing wrong with the vehicle.
<b>CRASH</b>	No
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the steering and pitman arms, damper, and tie rods were replaced prior to inspection. No other damage noticed on the vehicle. Recall H46 was completed 6/12/10.

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<sup>1</sup> 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.

<b>MATTER #</b>	1171185
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	15230096
<b>DATE OF INCIDENT</b>	07/28/2006
<b>DATE OF NOTICE</b>	07/31/2006
<b>MODEL/MODEL YEAR</b>	2005 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MS48C15G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	70,262
<b>OWNER</b>	[REDACTED] [REDACTED] Charlestown, NH [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering Wheel/Column: Lack/Loss of Power
<b>DESCRIPTION</b>	Owner/Driver, [REDACTED], stated that after he hit a bump in the road due to a culvert being constructed, he had trouble with the front end of vehicle. Something broke off and he lost steering and when wheel fell off the vehicle ran off the road and struck a tree. The culvert construction was 219 feet from the tree he struck. Driver complained of a sore back.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the left front ball lower joint was missing as well as a piece of the left front lower steering knuckle. The knuckle appeared broken from impact and the left front wheel and tire, while flat did not have any scrape marks on tire or wheel. Inspector drove to the scene of the accident and found the broken off piece of the knuckle at the base of the tree that the vehicle hit. The left wheel left skid marks on the roadway before the vehicle struck the tree indicating the wheel had not fallen off as was claimed. The front end components broke due to impact.

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<sup>1</sup> 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.

<b>MATTER #</b>	1206046
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18979876
<b>DATE OF INCIDENT</b>	09/30/2009
<b>DATE OF NOTICE</b>	10/1/2009
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 3500 Reg Cab Chassis 4x4
<b>VIN</b>	3D6WH46A87G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	48,218
<b>OWNER</b>	[REDACTED] [REDACTED] [REDACTED]
<b>COURT</b>	Hayes Center, NE [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Tie Rods / Drag Links: Broke
<b>DESCRIPTION</b>	Owner/Driver stated that he was driving on a two-lane gravel county road at about 30 mph (posted speed is 50 mph) when he felt a pull to the right and lost steering control. The vehicle went off the right side of the road and rolled down a 6-8 ft embankment landing on the roof.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the left outer tie rod separated from the socket. This may have been caused by the replacement tie rod that was installed on 11/17/08. The police report indicates the witness marks at the scene suggest the tie rod was dislodged prior to any impact.

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<sup>1</sup> 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.

<b>MATTER #</b>	1217241
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	20101723
<b>DATE OF INCIDENT</b>	07/30/2010
<b>DATE OF NOTICE</b>	11/1/2010
<b>MODEL/MODEL YEAR</b>	2005 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28C55G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	58,571
<b>OWNER</b>	[REDACTED] Bethel, CT [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage: Broke
<b>DESCRIPTION</b>	Owner states the steering linkage broke which cause the vehicle to hit a tree. Owner claimed he did not get Recall H46 because the address Chrysler had on record was wrong.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Vehicle inspection revealed <sup>1</sup> that the owner repaired the vehicle by himself prior to inspection. Owner did not provide any damaged components or photos for inspection. Unable to verify driver's complaint. Recall H46 was completed on this vehicle on 11/9/10.

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<sup>1</sup> 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.

<b>MATTER #</b>	1215723
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19867641
<b>DATE OF INCIDENT</b>	08/22/2010
<b>DATE OF NOTICE</b>	08/24/2010
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MX48A27G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	93,712
<b>OWNER</b>	[REDACTED] Crescent, OK [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: No Component :Broke
<b>DESCRIPTION</b>	Owner's girlfriend, Toni Harris, was driving the vehicle. She stated she was traveling approximately 35 MPH when she heard a loud popping noise in the front of the truck and the truck then started to serve. At first she thought a tire blew-out, but soon realized she had no control of the steering. The vehicle veered to the left, ran off the road and impacted a tree head-on. Owner stated he took the vehicle to a repair facility and they told him that a tie rod broke and it was related to the Recall H46 which was performed in 2009.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the right front tie rod end was separated at the ball and socket assembly resulting in complete separation of the right front tie rod assembly from the right front spindle steering knuckle assembly. No evidence or witness markings of impact with foreign object found on front tire/wheel assemblies, steering and/or suspension system assembly. Suspension and steering damage was limited to the right front tie rod end. Unable to check under-hood steering system components because the hood was damaged and could not be opened. Grease present inside ball joint housing. Recall H46 had been completed on 5/28/09.

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<sup>1</sup> 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.

<b>MATTER #</b>	1207230
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19042529
<b>DATE OF INCIDENT</b>	10/23/2009
<b>DATE OF NOTICE</b>	10/26/2009
<b>MODEL/MODEL YEAR</b>	2005 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MS48C85G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	59,414
<b>OWNER</b>	[REDACTED] Hatfield, AR [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Tie Rods / Drag Links: Broke:
<b>DESCRIPTION</b>	Driver/Owner stated he was traveling 30-35 mph when he heard a bang and he no longer had steering control of the truck. He swerved and went off the left side of the two lane asphalt dry road. He hit a sign, but not the sign post, with the hood before the vehicle went into a ditch.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the vehicle was equipped with grease fittings on the affected components there was no evidence of any lubricant in the cup of the tie rod. Recall H46 was found to be incomplete.

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<sup>1</sup> 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.

<b>MATTER #</b>	1220177
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	20578262
<b>DATE OF INCIDENT</b>	03/22/2011
<b>DATE OF NOTICE</b>	03/22/2011
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7LX38C06G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	86,672
<b>OWNER</b>	[REDACTED] [REDACTED] Egg Harbor City, NJ [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Tie Rods / Drag Links: Broke
<b>DESCRIPTION</b>	Per Owner/Driver's wife, the drive linkage fell off the vehicle and caused a minor crash. In December of 2010 they took the truck to a dealer for completion of Recall H46, but Mr. [REDACTED] claims it appeared no new parts were placed on the vehicle that he could see. Mr. [REDACTED] was not available for an interview. Mrs. [REDACTED] claimed Mr. [REDACTED] was traveling approximately 45 mph. There was a passenger present at that time. Suddenly Mr. [REDACTED] noticed that the vehicle was out of control. The vehicle went another way other than the position of the steering wheel. The vehicle went into oncoming traffic but did not hit another vehicle or obstacle. After the vehicle was stopped, Mr. [REDACTED] noticed that both front wheels were placed in a different direction.
<b>CRASH</b>	No
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> rust visible on the right outer tie rod end and on the ball socket. The right side outer tie rod had a hole for a grease fitting but there was no fitting installed in the tie rod. The left outer tie rod was tight and did have a grease fitting installed. There was evidence of the left outer tie rod being serviced as there was grease visible inside the tie rod boot. There was some damage to the inside of

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<sup>1</sup> 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.

the right front wheel due to contact with the broken right outer tie rod end. This damage occurred after the failure of the tie rod end. The steering damper was broken off at the weld. There was no visible impact or collision damage on the outside of the right front wheel or tire. There was some slight movement in both lower ball joints. There was also a slight amount of movement in the left upper ball joint. There was no movement in the right upper ball joint. Recall H4 had been completed 12/20/10.

<b>MATTER #</b>	1220550
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]o
<b>CAIR #</b>	20556962
<b>DATE OF INCIDENT</b>	02/14/2011
<b>DATE OF NOTICE</b>	03/17/2011
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 3500 Laramie 4x4
<b>VIN</b>	3D3MX48A67G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	123,666
<b>OWNER</b>	[REDACTED] Corryton, TN [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering Linkage: Broke
<b>DESCRIPTION</b>	Insurance company filed a subrogation claim, blaming accident on Recall H46. No statement from the driver was provided.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	The vehicle has not been inspected by Chrysler. The vehicle was being used as a car hauler. Photographs provided by the insurance company show failure of right side tie rod end, not drag link inner joint as specified in recall. This incident was not related to the recall.

<b>MATTER #</b>	1220091
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	20554043
<b>DATE OF INCIDENT</b>	03/4/2011
<b>DATE OF NOTICE</b>	03/16/2011
<b>MODEL/MODEL YEAR</b>	2005 Dodge Ram 3500 Slit Quad Cab 4x4
<b>VIN</b>	3D7MS48C85G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	167,094
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Easley, SC None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: No Component: Broke:
<b>DESCRIPTION</b>	Owner/Driver stated his steering "went limp" and his vehicle started easing toward oncoming traffic. He heard a big snap under the vehicle and the piece bounced back and hit the bottom of his vehicle. Said he could not steer at all and all he could see was the oncoming traffic on one side, and telephone pole on the other side. Stated he went through the telephone pole and almost went through a house.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the tie rod end broke away from passenger front wheel. The ball joint had not been greased at anytime. All grease fittings were dry.

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<sup>1</sup> 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.

<b>MATTER #</b>	1163575
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	14371935
<b>DATE OF INCIDENT</b>	12/05/2005
<b>DATE OF NOTICE</b>	12/12/2005
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Laramie Mega Cab 4x4
<b>VIN</b>	3D7KS29C36G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	1,800
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Alto, TX None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering
<b>DESCRIPTION</b>	Owner/Driver stated he was traveling 65 mph on a two-lane state highway. While crossing a bridge he heard a loud bang and his vehicle jumped to the right side of the concrete bridge rail. Stated his vehicle kept trying to climb up on the concrete bridge rail. He tried to steer his vehicle off the bridge rail, but the steering was unresponsive. While the vehicle was still traveling down the bridge rail the right side of the vehicle dropped down. He tried applying the brakes, but the vehicle did not stop. The vehicle traveled the length of the bridge about 50 feet where it came to a stop at the end of the bridge in a bar ditch. Stated he later returned to the site but could not determine where contact marks were and that there were no pot holes or objects on the bridge. Owner claimed to have a pre-existing back injury, which he said was re-injured during the crash.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the right front wheel assembly was completely broken off the vehicle. All damaged parts had concrete marks. Some steering and brake components were damaged by the accident.

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<sup>1</sup> 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.

<b>MATTER #</b>	1179895
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	16238004
<b>DATE OF INCIDENT</b>	04/21/2007
<b>DATE OF NOTICE</b>	04/26/2007
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Mega Cab 4x4
<b>VIN</b>	3D7KS29C76G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	29,495
<b>OWNER</b>	[REDACTED] Blaine, WA [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage: Vibration:
<b>DESCRIPTION</b>	Driver [REDACTED], stated that he traveling on the interstate at 70 MPH, when he suddenly lost steering of the vehicle and it went into a violent shake/shimmy. He stated that he started panic braking and the vehicle came to a stop very close to the guardrail on the shoulder of the roadway. When he got of the vehicle, he found the steering linkage had broken. The vehicle was towed to a dealer. The dealer advised it appeared that the damage was caused by a tow line being placed around the steering linkage. The owner of the vehicle, Joshua Labounty, denied this.
<b>CRASH</b>	No
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the steering wheel centering adjustment sleeve on the drag link was fractured. The fracture was adjacent to the threaded end of rod attached to passenger side steering knuckle. The sleeve was positioned with approximately 1 1/2 inches into the drag link tread stock. The fractured sleeve ends were mated together. The sleeve was bowed/bent forward. On the forward side of the sleeve the production black paint had stretch/strain marks and some paint missing. The paint on the inside of the bend was not disturbed. There was no rust in the fractured areas. The adjusting sleeve clamps were

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<sup>1</sup> 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.

in place and tight. The driver and passenger side fore and aft steering stops had no lubrication present and the stops had parchment rusty appearance. The engine was started and the steering wheel was moved from stop to stop and no resistance or binding was observed. It appeared some external force caused a bend in the steering link causing it to fracture. Possibly a tow rope as stated by the dealer.

<b>MATTER #</b>	1215628
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19776435
<b>DATE OF INCIDENT</b>	05/15/2010
<b>DATE OF NOTICE</b>	07/29/2010
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MX48C86G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	171,080
<b>OWNER</b>	[REDACTED] [REDACTED]
<b>COURT</b>	Lindale, TX [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage
<b>DESCRIPTION</b>	[REDACTED] stated he was driving down the road going 45-50 mph when the steering shock broke on his truck, throwing him into the ditch and he hit an embankment. He stated there was no prior warning. He stated four days later he got notice of Recall H46. Driver and passenger reported bruises.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	2
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the steering relay rod was separated from the right knuckle and bent backwards and partially snapped on the left end. The steering stabilizer was not with the vehicle. Both front tires were pointing outward, and both were flat. Mud and dirt was caked into many areas of the front suspension and wheels.

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<sup>1</sup> 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.

<b>MATTER #</b>	1212165
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19431940
<b>DATE OF INCIDENT</b>	03/27/2010
<b>DATE OF NOTICE</b>	03/30/2010
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28D47G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	38,063
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Pepperell, MA [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Tie Rod
<b>DESCRIPTION</b>	Owner/Driver stated the he was going about 25 MPH when heard a loud noise and the truck suddenly veered right and into a curb. He had three occupants in the vehicle. He stated that in January 2010 his vehicle did not pass state inspection because the left front tie rod end was loose and had excessive play, so he took the vehicle to a body shop where the left side tie rod end was replaced. He believes that the incident was caused by a failure of the tie rod related to Recall H46.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> a lack of lubricant in the right side outer tie rod that separated. It was unclear if the tie rod separated before or after impact. Recall H46 was incomplete.

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<sup>1</sup> 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.

<b>MATTER #</b>	1203193
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18546913
<b>DATE OF INCIDENT</b>	Unknown
<b>DATE OF NOTICE</b>	04/29/2009
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 2500 Slt Quad 4x4
<b>VIN</b>	1D7KS28C17J [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	80,000
<b>OWNER</b>	[REDACTED] Gurdon, Ar [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Lock-up
<b>DESCRIPTION</b>	Owner requested replacement of the vehicle under Lemon Law stating the vehicle was unsafe to drive due to problems with the steering.
<b>CRASH</b>	No
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	4/28/09 81,013 miles – Complaint of front end steering locking up while turning. Dealer technician was unable to duplicate complaint.

<b>MATTER #</b>	1215078
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18988469
<b>DATE OF INCIDENT</b>	N/A
<b>DATE OF NOTICE</b>	10/05/2009
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 3500 Slt Mega 4x4
<b>VIN</b>	3D7MX49A77G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	48,110
<b>OWNER</b>	[REDACTED] [REDACTED] Columbia, Md [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Lock-up
<b>DESCRIPTION</b>	Customer requested replacement/repurchase of the vehicle pursuant to Lemon Law due to repeated repairs for various components, including steering components.
<b>CRASH</b>	Unknown
<b>PROPERTY DAMAGE</b>	Unknown
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	<p>Chrysler did not inspect this vehicle, but the repair history relating to steering issues is noted as follows:</p> <p>4/28/09 81,013 miles – Complaint of front end locking up while turning and taking off. Dealer was unable to duplicate complaint and performed a front end alignment.</p> <p>1/27/10 – Dealer fixed noise in front differential, universal joint and front axle shaft.</p> <p>3/2/10 – Owner complained noise in front end again. Dealer could not find any problem with the vehicle.</p> <p>4/15/10 at 65,682 miles – Whole new front axle installed and front ball joints and lower control arms replaced.</p> <p>6/18/10 – Dealer tightened up the front end bolts as a temporary fix and ordered new track bar bolt and boot for tie rod ends. Later that night, customer heard noise again described as a big pop like a</p>

clanking sound when turning to the right or left.

6/22/10 – Dealer advised new track bar bolt and boot for tie rods ends installed, then determined that the gear box needed to be replaced as well as the end for the steering linkage and the pitman arm. Entire front axle was replaced.

<b>MATTER #</b>	1214734
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19720326
<b>DATE OF INCIDENT</b>	07/12/2010
<b>DATE OF NOTICE</b>	07/13/2010
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MX48C36G132974
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	76,510
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Dwight, IL [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT DESCRIPTION</b>	Suspension: Control Arm/Ball Joints: Broke:  Owner/Driver stated he heard a loud pop and thought he had a flat tire. He tried to turn the wheel to the right, but the vehicle went left. The vehicle went over a drain culvert, smashed into the culvert and popped the right rear tire. The vehicle then went into a bean field. The left front tire was turned to the left and the front right tire was straight. He got under the vehicle and found the tire rod was loose and off the vehicle, the stabilizer bar was broken, and the lower control was pushed under the differential.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> that the damage may be related to Recall H46. Two notices for the recall were sent to the owner on April 2009 and April 2010, but the recall was still incomplete at the time of the incident.

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<sup>1</sup> 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.

<b>MATTER #</b>	1206280
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18995278
<b>DATE OF INCIDENT</b>	08/2/2009
<b>DATE OF NOTICE</b>	10/07/2009
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MX48C06G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	232,145
<b>OWNER</b>	[REDACTED] Hiram, GA [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage: Broke
<b>DESCRIPTION</b>	Driver/Owner said he was traveling on the freeway at about 65 mph. He was hauling a trailer with three vehicles loaded on it. He stated the front tires started to bounce and the steering wheel vibrated. He said it felt like something broke in the steering. He lost control and the vehicle went to the left, entered the median, then went right causing damage to the underbody of the vehicle. The vehicle was eventually stopped when the parts that broke off dug into the ground slowing the vehicle to a stop.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Chrysler did not inspect the vehicles because it was repaired.

<b>MATTER #</b>	1208238
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19202599
<b>DATE OF INCIDENT</b>	12/26/2009
<b>DATE OF NOTICE</b>	12/31/2009
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Mega Cab 4x4
<b>VIN</b>	3D7KS29C46G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	88,151
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Wamego, KS [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage: Broke
<b>DESCRIPTION</b>	Owner/Driver stated that he was traveling about 25 mph when he lost control of steering on icy roads, he slid into a ditch and then heard a loud pop. He thought the incident might be related to the Recall H46.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the tie rod end broke as a result of the impact. Two Recall 46 notices were sent to the owner (April and November 2009) prior to the crash.

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<sup>1</sup> 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.

<b>MATTER #</b>	1221618
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	20718157
<b>DATE OF INCIDENT</b>	None
<b>DATE OF NOTICE</b>	4/19/2011
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 2500 Slt Quad 4x4
<b>VIN</b>	3D7KS28A87G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	44,757
<b>OWNER</b>	[REDACTED] Farmington, UT [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering
<b>DESCRIPTION</b>	Owner requested replacement/repurchase pursuant to Lemon Law due to problems with the exhaust, emissions and a vibration in the front end that started in January 2010.
<b>CRASH</b>	No
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Chrysler did not inspect this vehicle. The dealer replaced the left drag bar, but the vibration remained. The vehicle needed new drag bars at the tie rod ends and the adjustment sleeves as well. The dealer advised the vehicle had the new steering kit and that tie rod bar broke.

<b>MATTER #</b>	1180193
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	16269710
<b>DATE OF INCIDENT</b>	05/01/2007
<b>DATE OF NOTICE</b>	05/04/2007
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28D16G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	2,192
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Taberg, NY [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Steering Wheel/Column
<b>DESCRIPTION</b>	Owner/Driver stated he was driving approximately 55 mph, traveling straight, when the steering wheel suddenly turned very hard to the left causing loss of control. The vehicle then collided with a truck traveling in the adjacent lane. He stated he had noticed in the past that when the vehicle drove over bumps the front end of the vehicle would "wobble" and make a whining noise. He had taken the vehicle to the dealer two weeks prior and was advised there were no known problems with the vehicle. He did not experience any prior difficulties with the steering. He believed that a defect with the steering system caused this accident.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the front driver side sway bar link pin was broken. The front driver side coil spring was removed from the vehicle. The outer tie rods on both sides were securely in place. The axle was pushed rearward on the driver's side, the arm that attaches the frame to the rear of the axle (on the driver side) was bent in the center. The steering column shaft was securely connected to all the way to the steering gear. When the steering wheel was turned the steering gear turned normally but the wheels did not. The inner tie rod end that

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<sup>1</sup> 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.

attaches to the steering gear was detached. The inner tie rod end was in the rear of the truck at time of inspection. The inner tie rod end was bent upward and broken apart from the tie rod at the end of the threaded portion. The portion of the tie rod end that threaded onto the tie rod is still in place. The ball and stem portion of the tie rod end was still securely attached to the steering gear arm. The tie rod separated at the ball and socket.

<b>MATTER #</b>	1203371
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18683219
<b>DATE OF INCIDENT</b>	06/12/2009
<b>DATE OF NOTICE</b>	06/19/2009
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MX48C46G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	101464
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Frierson, LA None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering
<b>DESCRIPTION</b>	Owner/Driver stated he was traveling on a highway when he heard a clanking noise and the vehicle started to vibrate similar to the way it would if a tire blew out. He lost control and the vehicle went off of the road and hit a tree. He states something broke and it is related to the steering recall. He stated he never received a recall notice.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> that the outer tie rod separated from the socket. There was no grease in the socket. The RF tie rod end socket is separated from the RF tie rod ball stud. The tie rod socket was dry or has very little lubricant in the socket. The LF tie rod end is loose and appears to be dry of lubricant.

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<sup>1</sup> 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.

<b>MATTER #</b>	1203006
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18629996
<b>DATE OF INCIDENT</b>	06/01/2009
<b>DATE OF NOTICE</b>	06/01/2009
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Laramie Quad Cab 4x4
<b>VIN</b>	3D7MX48C36G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	111,096
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Estell Manor, NJ [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Tie Rods / Drag Links: Broke
<b>DESCRIPTION</b>	Owner/Driver stated he was driving on the expressway, on a bridge when the tie rod snapped off and pulled the vehicle left. He was in far left lane, and the truck went left into the concrete barrier and tried to climb over the barrier before coming to a stop.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	The steering system had been repaired prior to the inspection. The parts that were replaced were provided for inspection. Both tie-rods, the drag link and the steering damper were provided for inspection. Inspection revealed <sup>1</sup> the ball and stem portion of the left side outer tie-rod was separated from the socket portion. The ball and stem were not available for inspection. All other components of the linkage were intact. The right side outer tie-rod was difficult to rotate and appeared dry and rusted.

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<b>MATTER #</b>	1216990
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	20064879
<b>DATE OF INCIDENT</b>	10/14/2010
<b>DATE OF NOTICE</b>	10/19/2010
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 3500 Slt Mega Cab 4x4
<b>VIN</b>	3D7MX49C77G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	76,162
<b>OWNER</b>	[REDACTED] Gueydan, LA [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage: Broke
<b>DESCRIPTION</b>	Owner/Driver stated that he was traveling on LA Hwy 91, when suddenly he heard a noise from under his truck, he thought it sounded like a tire blow-out. Immediately he noted that he had no steering and the front end of the truck started hopping up and down. Driver said the vehicle went first to the left, then to the right and then it went to the left again and across the road and into the ditch.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the right tie rod end was dry of lubricant causing the tie rod end to drop out of the socket. The owner stated he changed his own oil and was not aware the tie rods needed to be lubricated.

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<b>MATTER #</b>	1205423
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18928113
<b>DATE OF INCIDENT</b>	09/11/2009
<b>DATE OF NOTICE</b>	09/14/2009
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Laramie Quad Cab 4x4
<b>VIN</b>	3D7MX48C96G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	107,660
<b>OWNER</b>	[REDACTED] Seiling, OK [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Tie Rods / Drag Links: Broke Suspension: Linkage: Broke:
<b>DESCRIPTION</b>	Owner states he was traveling approximately 8 MPH on a rural country road when the steering suddenly failed and the truck veered off into a ravine and landed on its roof. Driver complained of bruises to his leg and back.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the left side tie-rod end socket separated from left side steering knuckle arm. No witness markings were present on the steering system components, suspension system components, frame or undercarriage that would indicate impact with foreign material(s). Tires and wheels were in good condition and showed no markings of impact with foreign material(s).

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<sup>1</sup> 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.

<b>MATTER #</b>	1200171
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18317662
<b>DATE OF INCIDENT</b>	02/1/2009
<b>DATE OF NOTICE</b>	02/05/2009
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Laramie Quad Cab 4x4
<b>PEER OR SUBJECT</b>	Peer
<b>VIN</b>	3D7MX48C46G [REDACTED]
<b>MILEAGE</b>	88,752
<b>OWNER</b>	[REDACTED] Winona, TX [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering
<b>DESCRIPTION</b>	Owner, [REDACTED] stated his employee, [REDACTED], was driving the truck down a gravel road towards his ranch office at about 35 MPH when the right outer tie rod broke and he went into the ditch on the left side of the road and hit a barbed wire fence and posts. The wrecker driver wired the tie rod socket back to the ball to steer the truck onto the wrecker. He stated this was the second time a tie rod had broken on this truck, the first time being at 56,000 miles. He stated he was driving that time, and went into a deep ditch off a county road.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the right outer tie rod end ball was separated from the socket. There was a light coating of grease in the socket and on the ball. There was a grease fitting on the bottom of the tie rod socket.

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<b>MATTER #</b>	1203743
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18726856
<b>DATE OF INCIDENT</b>	06/05/2009
<b>DATE OF NOTICE</b>	07/06/2009
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MX48C76G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	40,000
<b>OWNER</b>	[REDACTED] Hot Springs, MT [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Tie Rod
<b>DESCRIPTION</b>	Owner/Driver stated he was driving about 30 MPH when the tie rod dropped to the ground, the right wheel made a right turn and he went down an embankment and into the river below. The driver window was open and when the truck hit the water he climbed out the window opening and made it to shore.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	The vehicle could not be removed from the water for almost a month due to current and depth. Inspection revealed <sup>1</sup> the lower tie rod end severed from top half. It had a carbon like residue in the bottom. The upper tie rod end was still attached to the steering arm. The top swiveled freely and felt lubricated and had a grease film on the ball bottom half.

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<sup>1</sup> 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.

<b>MATTER #</b>	1201540
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	18450463
<b>DATE OF INCIDENT</b>	Unknown
<b>DATE OF NOTICE</b>	03/24/2009
<b>MODEL/MODEL YEAR</b>	2008 Dodge Ram 5500 Reg Chassis Cab 4x4
<b>VIN</b>	3D6WC76A88G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	28,388
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Portland, OR [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Linkage
<b>DESCRIPTION</b>	[REDACTED] stated his driver, [REDACTED] was driving the vehicle at time of incident. He stated that [REDACTED] had just loaded an F-250 Ford onto the flat bed of the truck and was driving away from the spot of the pick up when the steering suddenly failed. He stated [REDACTED] was traveling at approximately 10 MPH and could not stop fast enough to prevent impacting a yellow post in the parking lot.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> a fractured steering sector cross shaft. There was a twist in the spline adjacent to upper fracture and a missing mounting hexagonal bolt head. One half of the fractured cross shaft was observed in the pitman arm and the pitman arm was tied to steering drag link with a bungee cord. Two fractures appeared in two areas of the cross shaft in the splined taper between the steering housing and the pitman arm. The fractures were observed to be exceeding elastic limit ductile shear resulting in a slip plane appearance. The passenger side axle steering stop pad revealed heavy impact marks to the knuckle surface, the axle housing showed impact marks near turning right radius steering stop pad. The suspension trailing arms showed

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tire marks to the vertical walls of the arms. The front anti sway bar was moved laterally towards the driver side approximately 1 inch. There was no steering column slack or steering wheel damage found.

<b>MATTER #</b>	1213701
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19588247
<b>DATE OF INCIDENT</b>	05/18/2010
<b>DATE OF NOTICE</b>	05/28/2010
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 3500 Laramie Quad Cab 4x4
<b>VIN</b>	3D7MX48C66G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	131,504
<b>OWNER</b>	[REDACTED] Bellville, TX [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Steering: Pump-Power
<b>DESCRIPTION</b>	[REDACTED] owner of the vehicle, stated that the driver of the vehicle, Luis Alamillo, had steering problems and tried to pull off on the right side of the road, but the vehicle made a sudden left and collided with another vehicle. Nature of the reported injury is unknown.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Tie rod linkage was replaced prior to inspection, but some of the parts were still available. Inspection revealed <sup>1</sup> the joint that came apart showed no lubricant in the socket or on the ball itself but there was a grease fitting in the ball joint and it had been partly ground off by contact with the road surface.

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<sup>1</sup> 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.

<b>MATTER #</b>	1216119
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	19944560
<b>DATE OF INCIDENT</b>	09/15/2010
<b>DATE OF NOTICE</b>	09/15/2010
<b>MODEL/MODEL YEAR</b>	2007 Dodge Ram 3500 Slt Quad Cab 4x4
<b>VIN</b>	3D7MX48A27G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	92,000
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Mulberry, AR [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Tie Rods / Drag Links: Broke
<b>DESCRIPTION</b>	Owner/Driver stated he was driving up hill on County Road 40 when the truck began to shimmy and then he could not control it and ran off the road. He thinks the tie rod broke on the right side. Stated that there were recent repairs done to the gear box, but the dealer was telling him that those repairs would not have an impact on the tie rod.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	1
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> the right tie rod ball joint was separated and the steering absorber shaft was bent. There was no distortion of the ball joint socket. The socket had lubricant present. No impact evidence to the tie rod.

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<b>MATTER #</b>	1176212
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	15803504
<b>DATE OF INCIDENT</b>	12/06/2006
<b>DATE OF NOTICE</b>	12/22/2006
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28C36G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	26,000
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	RED OAK, OK None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Control Arm/Ball Joints: Broke
<b>DESCRIPTION</b>	Driver/Owner alleges front end failed/broke causing severe damage to the vehicle. He drove off the roadway about 30 feet while trying to avoid a dog. The right tire turned wrong side out. He stated the front end completely failed/broke and the brakes did not work.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	No
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Repairs to the suspension and axle were under way prior to the inspection. The inspection revealed <sup>1</sup> that the damage to the suspension and front end components was caused by impact. The tire and wheel show impact damage, which led to the other components being damaged.

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<sup>1</sup> 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.

<b>MATTER #</b>	1176277
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	15832739
<b>DATE OF INCIDENT</b>	01/02/2007
<b>DATE OF NOTICE</b>	01/03/2007
<b>MODEL/MODEL YEAR</b>	2006 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28C46G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	29,642
<b>OWNER</b>	[REDACTED]
<b>COURT</b>	Philomath, OR [REDACTED] None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Control Arm/Ball Joints: Broke
<b>DESCRIPTION</b>	Owner/Driver stated he was traveling on a gravel logging road going about 25 MPH when he moved over to allow a log truck to go by. He moved to the right and heard something pop in the front of the vehicle. He was on the shoulder when he tried to turn left and get back on the road. The truck would not turn. He applied the brakes, then went down an embankment and turned over 3-4 times and ended up in the river.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> there appeared to be damage to front axle housing from a repair shop forklift moving the vehicle prior to inspection. The right front tie rod detached from the ball at the steering knuckle. The steering linkage absorber bent at the attachment. The right front axle lower control trailing arm was bent in the center. Both right and left tie rod ends were replaced 5/30/2006 at 15,889 miles. The ball joints had been replaced at 19,000 miles.

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<sup>1</sup> 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.

<b>MATTER #</b>	1176877
<b>FILE TYPE</b>	Legal Claim
<b>FILE NAME</b>	[REDACTED]
<b>CAIR #</b>	15886666
<b>DATE OF INCIDENT</b>	01/19/2007
<b>DATE OF NOTICE</b>	01/22/2007
<b>MODEL/MODEL YEAR</b>	2005 Dodge Ram 2500 Slt Quad Cab 4x4
<b>VIN</b>	3D7KS28D85G [REDACTED]
<b>PEER OR SUBJECT</b>	Peer
<b>MILEAGE</b>	58,964
<b>OWNER</b>	[REDACTED] [REDACTED] Springfield, OH [REDACTED]
<b>COURT</b>	None
<b>DOCKET #</b>	None
<b>ALLEGED DEFECT</b>	Suspension: Control Arm/Ball Joints: Broke
<b>DESCRIPTION</b>	Owner/Driver claimed the ball joint and tie rod broke while driving down the road. She stated she was driving on [REDACTED] merging onto [REDACTED] when she heard a loud noise. She could not steer the vehicle and pulled over to the side of the road and scraped the guardrail. The vehicle was towed to the dealer. She stated the dealer told her the tire blew out.
<b>CRASH</b>	Yes
<b>PROPERTY DAMAGE</b>	Yes
<b>INJURIES</b>	0
<b>FATALITIES</b>	0
<b>ANALYSIS</b>	Inspection revealed <sup>1</sup> damage to the suspension/steering components. The right front wheel was flat. There was a section of the right front rim that showed signs of contact with the pavement. There were two large sections missing from the right front tire. The pitman arm had separated from the pitman shaft. The steering dampener had been bent, also the upper and lower control arms had been bent. The right front axle housing sustained a fracture and separation where the lower ball joint should mount. The entire right side of the vehicle displayed signs of impact that ran from the right front fender to the right rear corner of the truck bed.

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<sup>1</sup> 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.