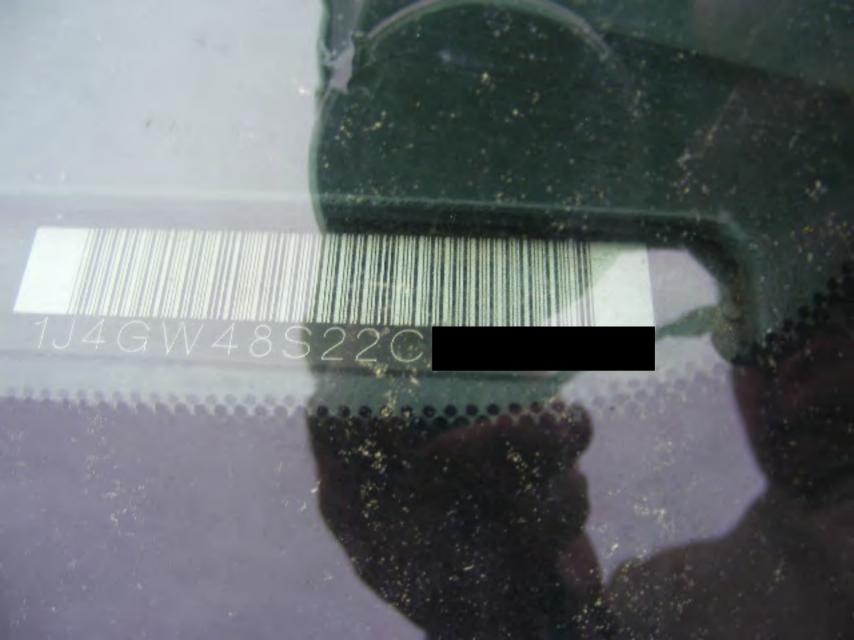
## INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

EA12-001
CHRYSLER
ENCLOSURE 4
LEGAL
WJ



































































Ring Stemary Cord Program DRE LUITITIOS Delice to I Lash MUSI Support

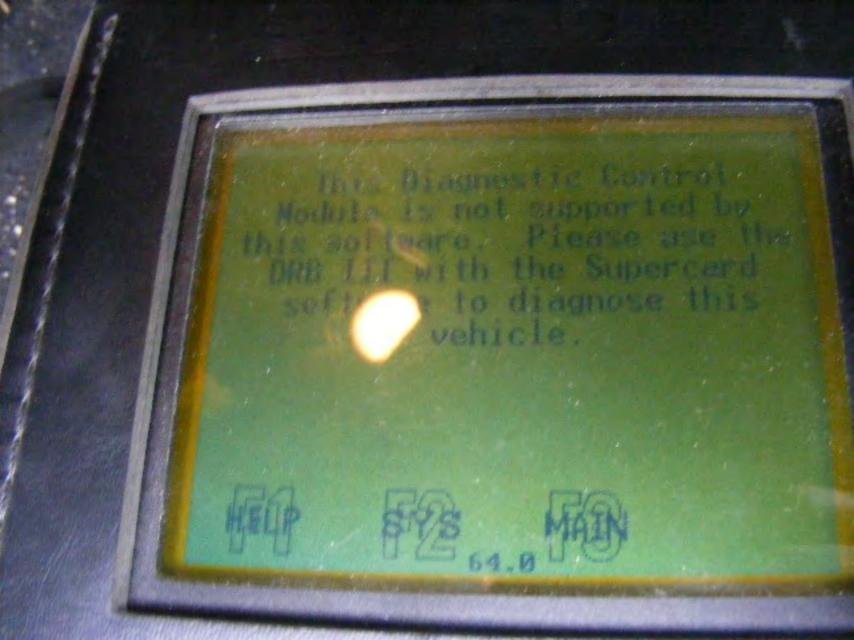
DAN 111 COMB Nouthboatton BaimlerChrysler Capuright (0) 1993-2886 Rill Rights Reserved TELEPSE 64 0 01 Released 14:28:21 3/20/2001 Version: 4.02 14:02:18 3/19/200 Datab Cable in use: J1962 (CH7000A) 64.0





Side Hirbons Airban DayOff Switch System Occupant Classification Sus

Please Wait.











Unuble to ID Module for press any key to continu













- THE BACK SEAT IS THE SAFEST PLACE FOR CHILDREN.
- NEVER PUT A REAR-FACING CHILD SEAT IN THE FRONT.
- SIT AS FAR BACK AS POSSIBLE FROM THE AIR BAG.
- . ALWAYS USE SEAT BELTS AND CHILD RESTRAINTS.































































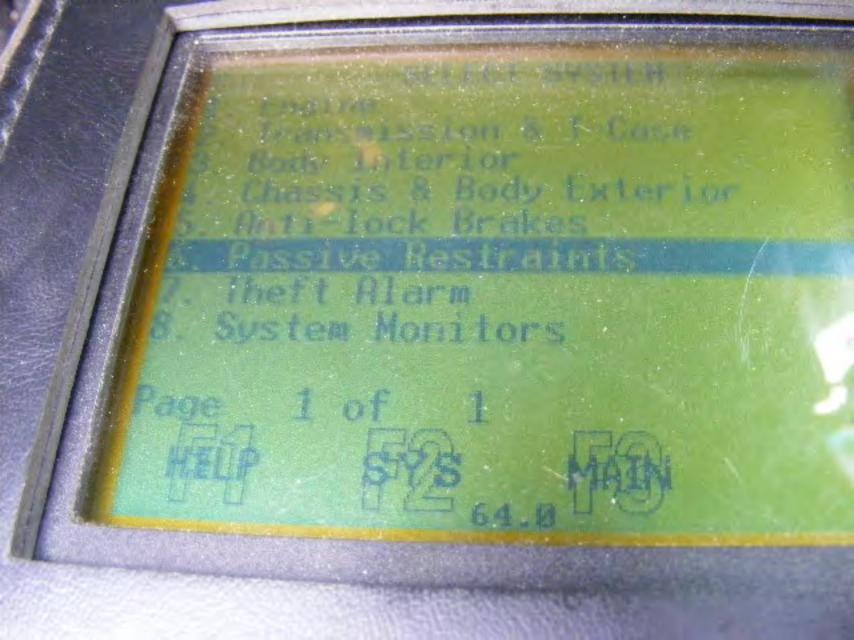










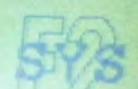


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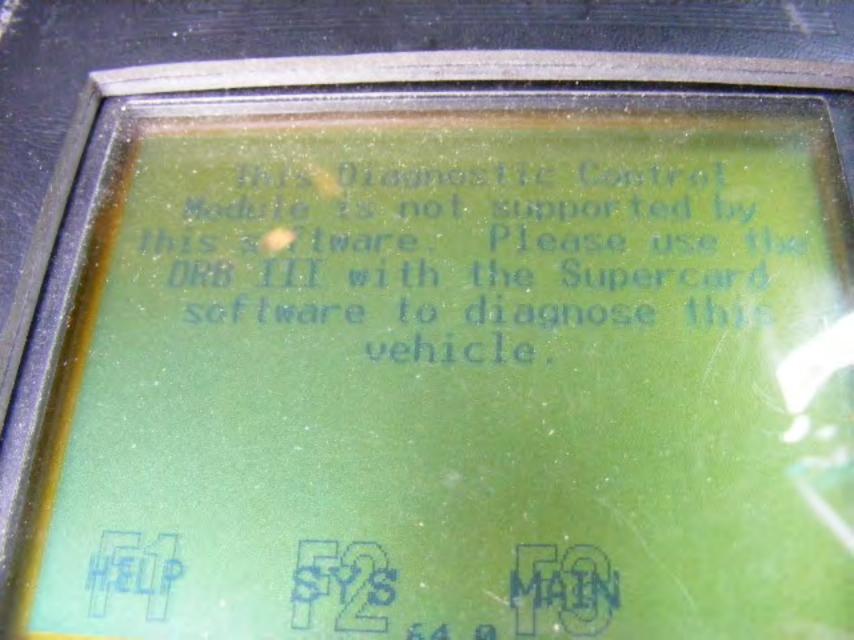
Cottersions Controller Type

Please Wait ...

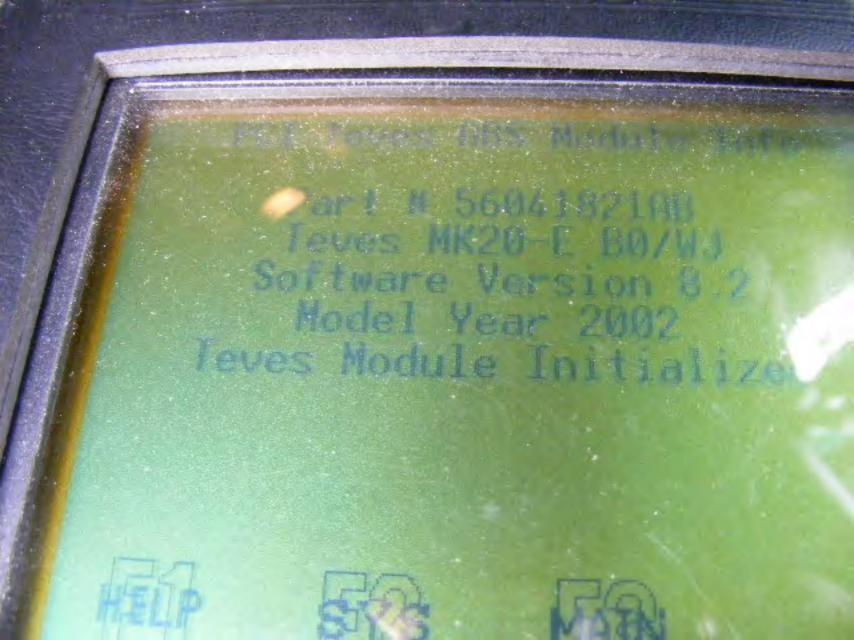


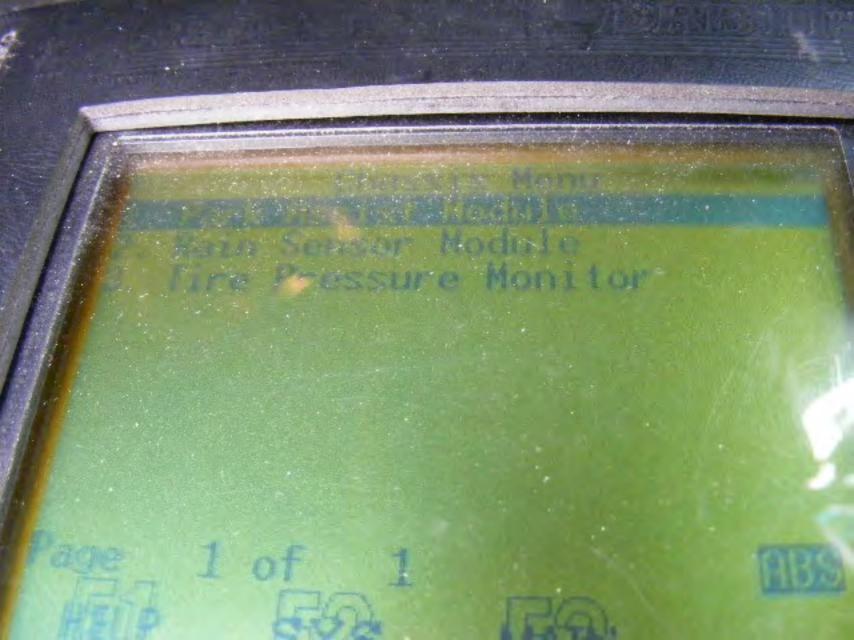






Aster Tring Controller Type Please Wait ...







Determing Controller Type

Please Wait ...

展記





1- 11 L SAL 4 OF 18 Module Lal 19 0 Bill Natural fisp. Unleaded Fuel Low Emission Vehicle (NEV Astomatic Irans, RW Orive Jeen Truck Engine, JILC+ Single Fan. Variable Spen PCM Part#: 5604495748 Homologation ID: WBSAUU CARB OBD II Vehicle



Customer /	Assistance	Inquiry	Record (CAIR)	)#			2096556		
Vin	1J4GW48S2	20	Open Date	06/10/2011	Built Date	05/15/2002			
Model Year	2002	Body	WJJH74	JEEP GRAND CHEROKEE LAREDO 4X4 SPORT UTILITY 4-DR					
In Service Dt	05/31/2002	Mileage	70,000	Dealer Zone	32	NEW YORK			
Plant	С	JEFFERSO ASSEMBLY		Market	U	us			
Color	PEL	INFERNO RED TINTED PEARL COAT							
Engine	ERH	ENGINE - 4.0L POWER TECH I-6							
Transmission	DGK	TRANSMISSION - 4-SPD. AUTOMATIC,42RE							
Dealer	43678	KALLIS CHRYSLER							
Dealer Address	244 MAIN ST	STREET							
Dealer City	BELFAST			Dealer State	ME	Dealer Zip	04915		
Owner						Contact Type	TELEPHONE		
Address			7_7			Home Phone			
	LEWISTON ME					Country	UNITED STATES		

Product - Body / Trim / Paint Finish - Air Bag - Unjustified Deployment - Both	Both air bags deployed while driving		
Product - Unknown - Unknown - Accident - Default	Injury, no accident		
Corporate - Property Damage - Default - Default - Default			
Dealer - By-Pass - Default - Default - Default			

1. Who is calling and what is their contact information? Mrs. is calling Preferred:

Alternate:

2. What happened?

Customer s daughter s was driving the vehicle on the road at 45-50 miles per hour on Main and the airbags deployed hurt and he put his blinker on and drove to the side of the road. was hurt bruised and cut on her right arm, she also had bruises on both legs, she was turned talking to someone in the backseat. Customer took her daughter to the emergency and she checked out alright just with bruises and cuts. May 30, 2011 is the date this happened at approximatly 5pm. Customer had the vehicle towed because she could not drive it to the towing garage, from there she had it brought to her mechanic IRF, Mark Dumais owner of Dumais Auto phone number (207) 375-8332 . IRF has done some research and he came up with \$4,000 for repair, although he will not touch the vehicle to complete the repair.

3. What is the current location of the vehicle?

Vehicle currently is at Dumais Auto 13 Wales Road Sabattus, ME phone number (207) 375-8332

Customer email address for case updates: at

Reassigned to 88S

Customer is seeking that Jeep pay for the airbags to be put back into the Jeep and for the vehicle to be put to rights.

>> case is being forwarded to Chrysler Legal (CCRG) (2-5 days contact) VEHICLE LOCATED AT:

**Dumais Auto Repair** 

13 Wales Road

Sabattus, ME 04280-4136

(207) 375-8332
Per OGC Matrix, reassigned to 82T. MG17
6/13/11 ASSIGN TO KSS28.
CAIR NUMBER 20965562 REQUEST EAA INSPECTION 06-13-2011 11:42
CAIR NUMBER 20965562 E-MAIL SENT TO EAA 06-13-2011 11:42
PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 06/14/11 AT 15:16:33 20965562
CCRG Open Date: 06/10/2011 15:27:40
Letter Sent: Acknowledgement 06/14/2011 08:32:11

## EA12-001 CHRYSLER ENCLOSURE 4 LEGAL WJ



Customer /	Assistance	Inquiry	Record (CAIR)	)#			1139541		
Vin	1J4GW48S6	2C	Open Date	06/27/2003	Built Date	10/11/2001			
Model Year	2002	Body	WJJH74	JEEP GRAND CHEROKEE LAREDO 4X4 SPORT UTILITY 4-DR					
In Service Dt	10/31/2001	Mileage	26,000	Dealer Zone	32	NEW YORK			
Plant	С	JEFFERSO ASSEMBLY		Market	U	us			
Color	PBQ	STEEL BLUE PEARL COAT							
Engine	ERH	ENGINE - 4.0L POWER TECH I-6							
Transmission	DGK	TRANSMISSION - 4-SPD. AUTOMATIC,42RE							
Dealer	26002	SAM DELL CHRYSLER-JEEP							
Dealer Address	7800 BREW	EWERTON RD							
Dealer City	CICERO Dealer State NY				NY	Dealer Zip	13039		
Owner						Contact Type	TELEPHONE		
Address						Home Phone			
	LIVERPOOL NY					Country	UNITED STATES		

6/27 Owner's wife was driving vehicle yesterday 6/26 at about 8.10 pm on Lithey Road (about 1/2 block from his driveway) when the air bag light came on. The owner started to pull over and just then both front air bags deployed. Vehicle was not involved in any type of accident. Owner was taken to the emergency room and she has abrasions and welts on her right arm. Their insurance company was called, they use Royal & Son Alliance (their broker is Haller-Fryer and Koon) Phone- (315)451-1500. Then vehicle towed to dealer 26002- Sam Dell Chrysler right now. Their phone is- (315)458-0999. Their address- 7800 BREWERTON RD, CICERO, NY. Owner looking for rental. Advised at this time DCX not offering rental until vehicle diagnosed and then dealer and special investigations would review if issue merited a rental.

Product - Body / Trim / Paint Finish - Air Bag - Activation - Both

Assigned to rap99

Owner calling for an estimate of when he can expect a call and for an understanding of who's going to pay for his rental expenses in the interim of waiting for the inspection and subsequent repair of the vehicle. Writer provided owner file number and advised owner of lines 10-12.

Dealer 62950 calling in regards to above inquirying investigation, agent stated that there was no update, howvere customer should recieve letter with contact information from legal prior to investigation. 07/15/03 Customer calls back seeking an update of the file. Customer states that he had received a contact letter from RAP99, but when he tried to call him, his voice mail was full. Writer advised customer to stay in contact with RAP99, and informed customer that an E-mail would be

stay in contact with RAP99, and informed customer that an E-mail would be sent to that agent informing him of customer contact. No further promises made to the customer at this time.

Vice president (VP) Todd from dealer 62950 requesting an update on behalf of owner. Writer informed VP that the customer has to stay in contact with RAP99 for further update.

- 08/08/2003 a signed release cam in.

It was fax and CIMS to R. Polkowski

Photos provided by OGC manually loaded on 03/26/04

































为部地定品

O RESPONSE from ORC Floase make centum of the following items:

1) Ignition is con-2 DRB III is proper connected to the Data connector.

Maria Artista Militar



























## EA12-001 CHRYSLER ENCLOSURE 4 LEGAL WJ



















































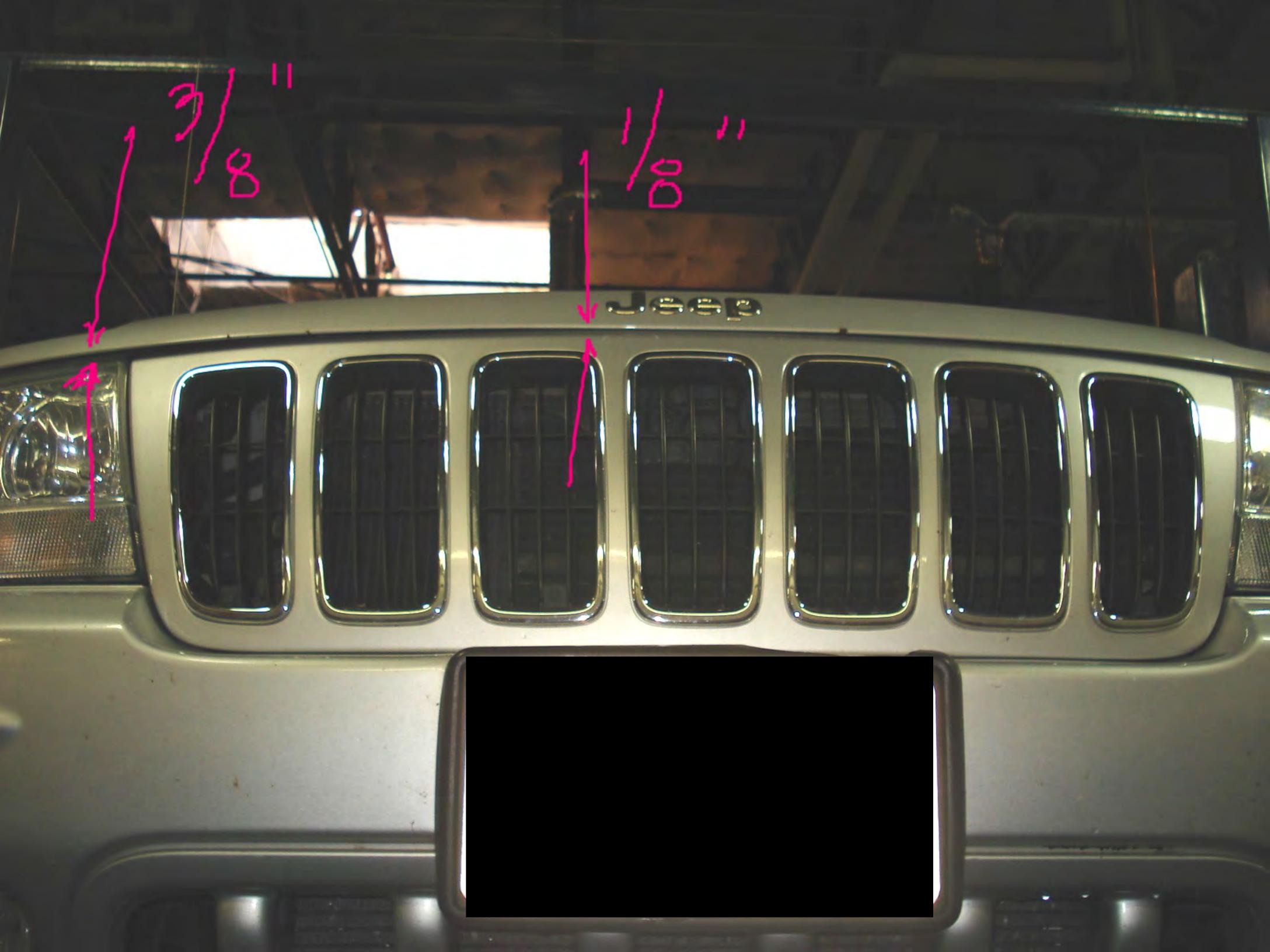




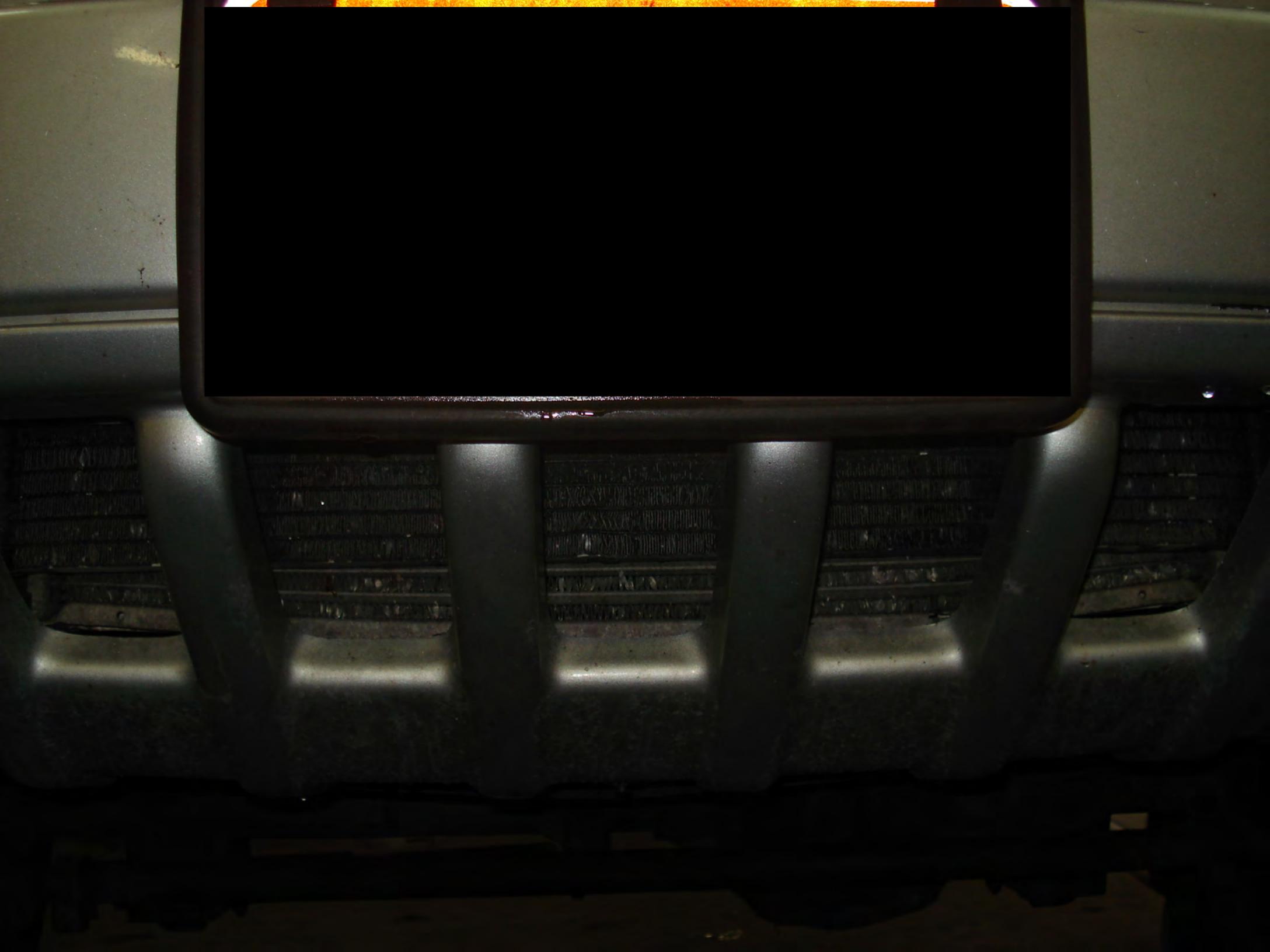






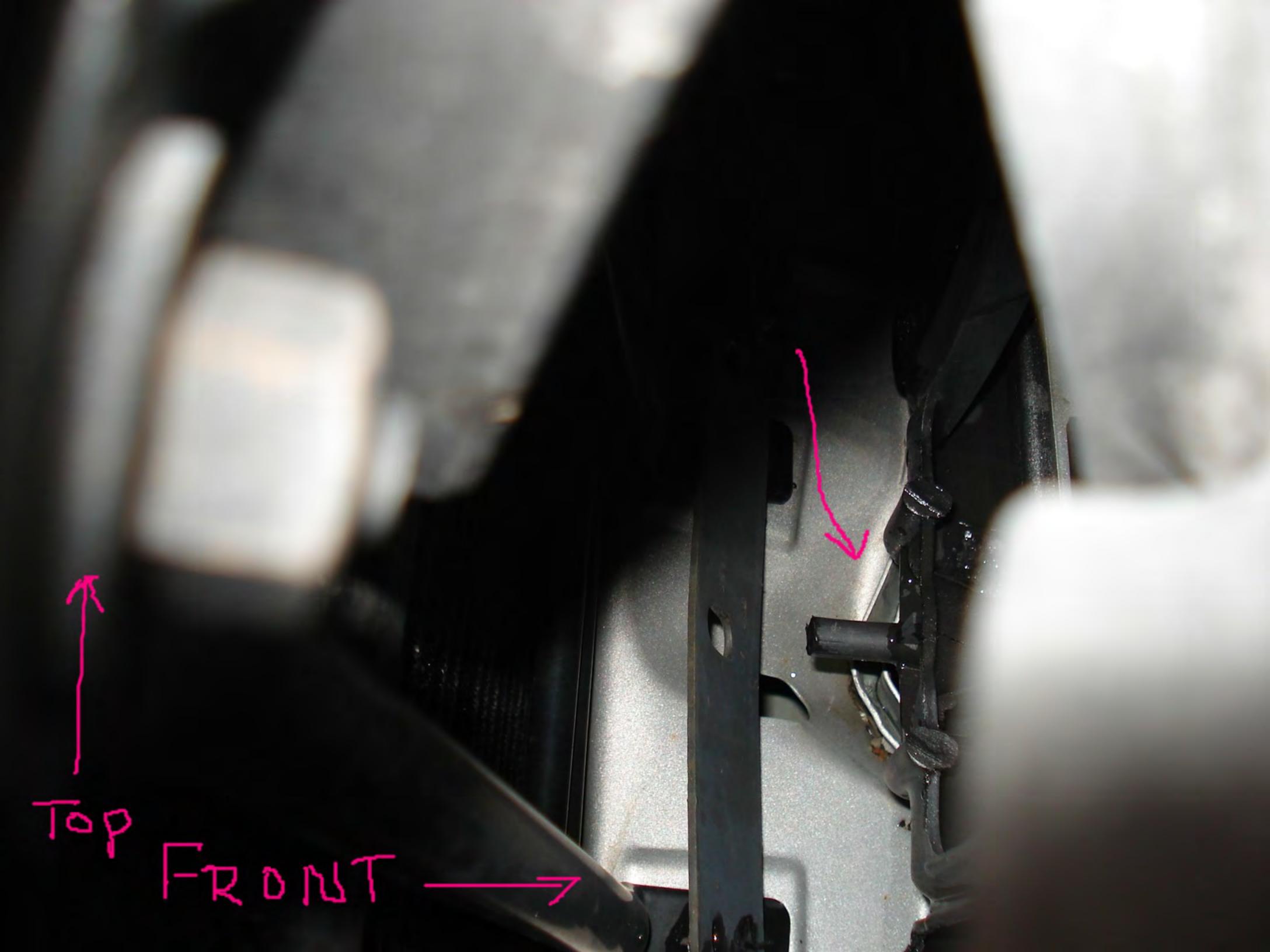


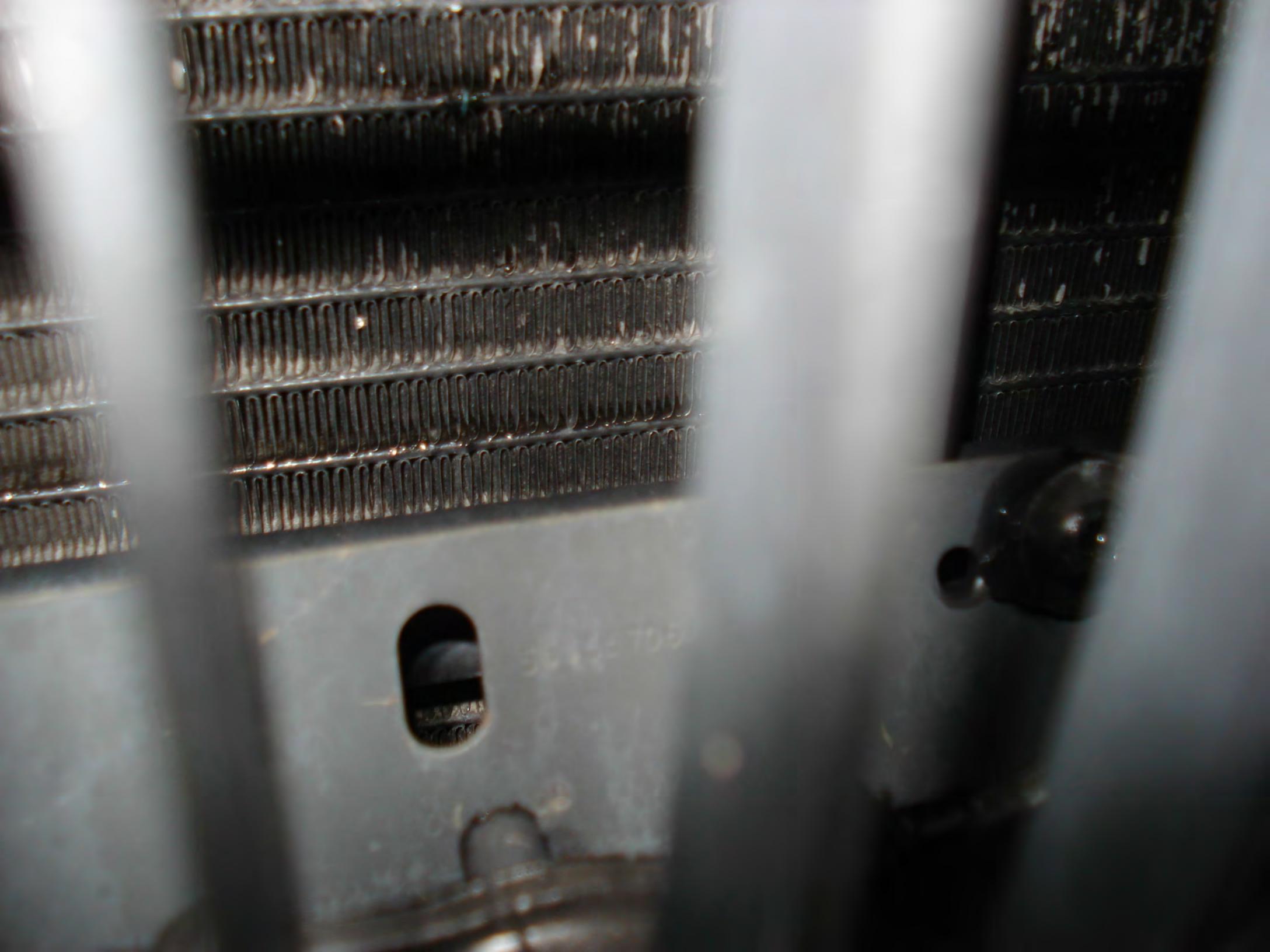


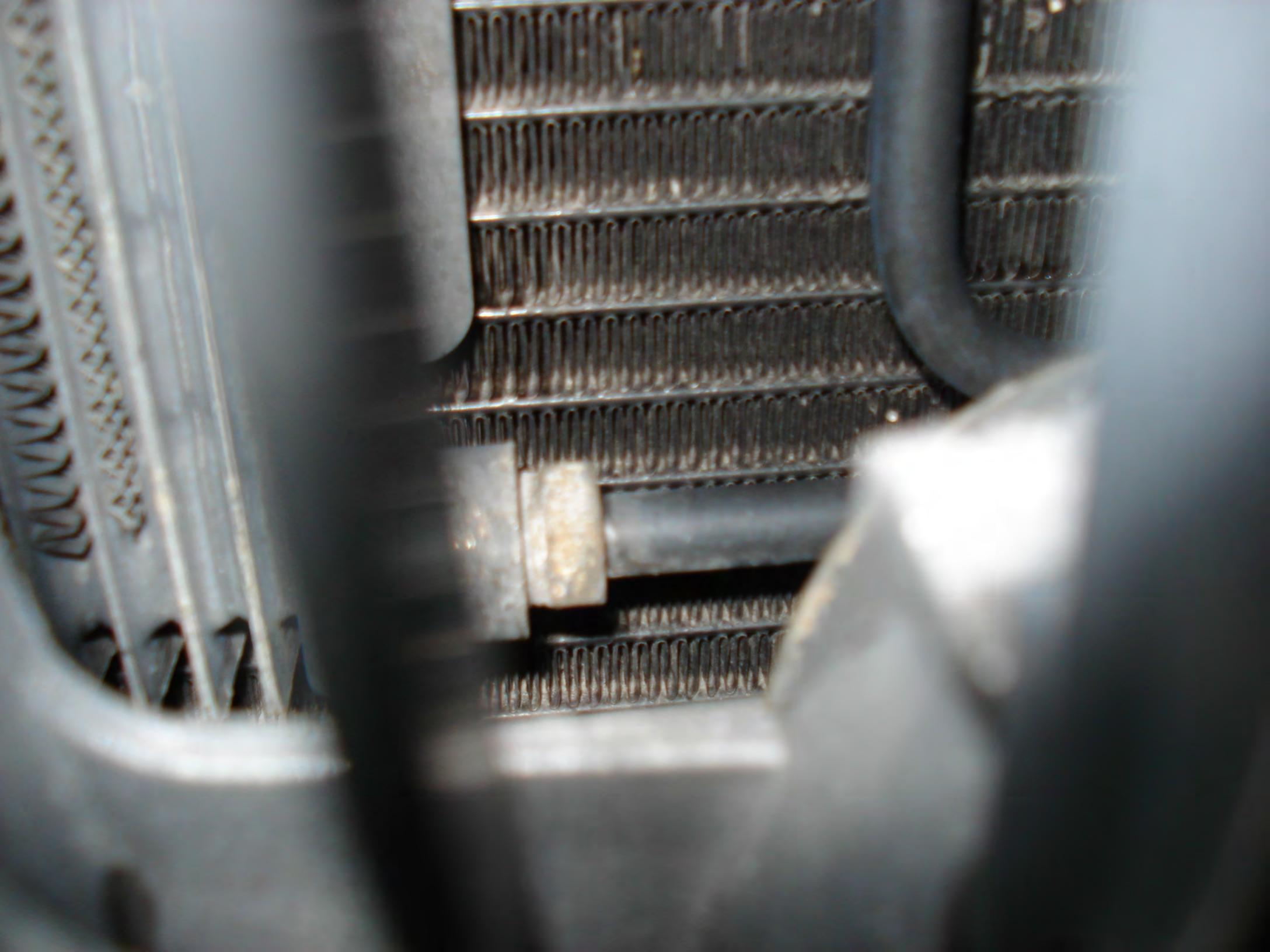


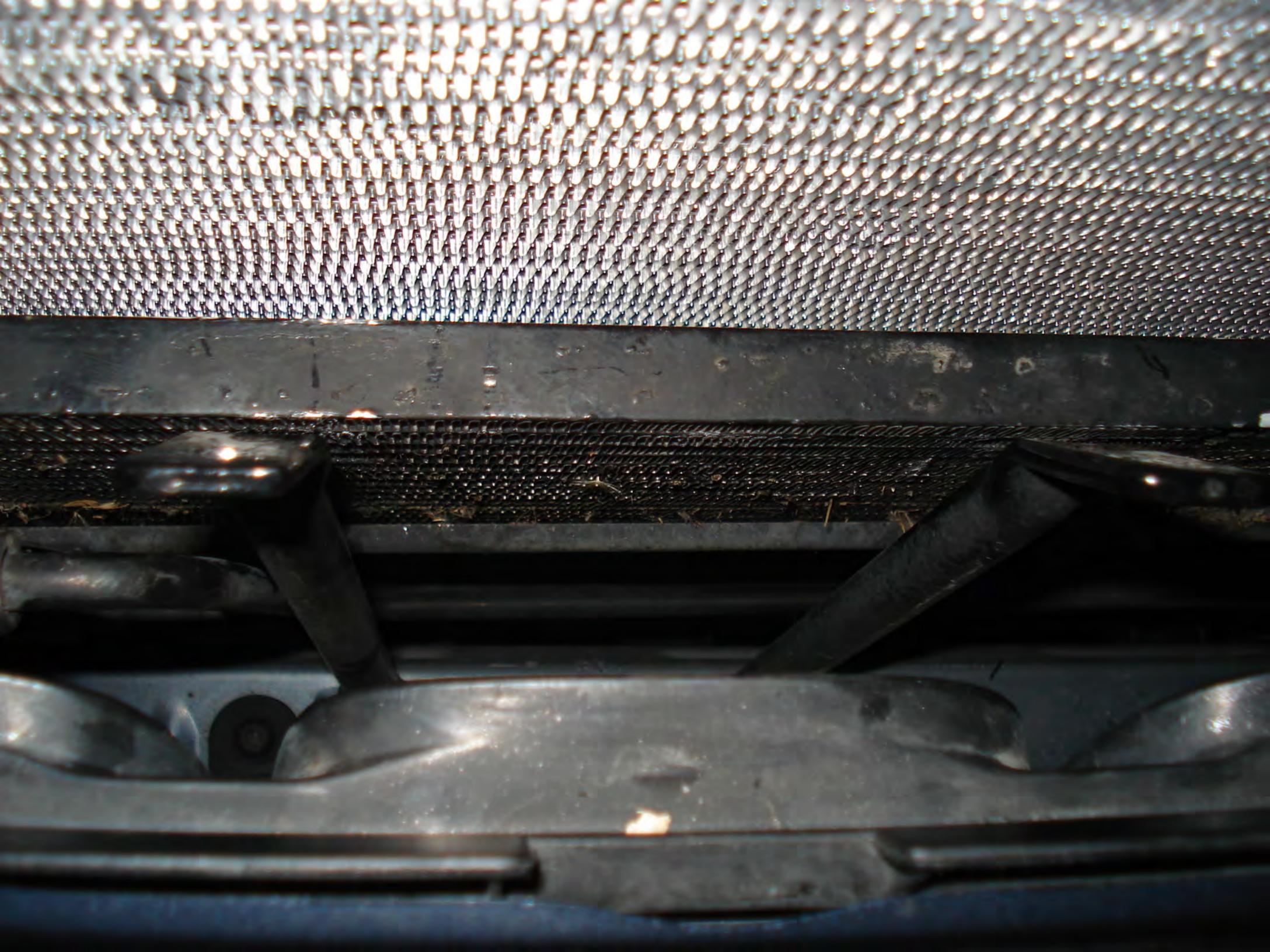




















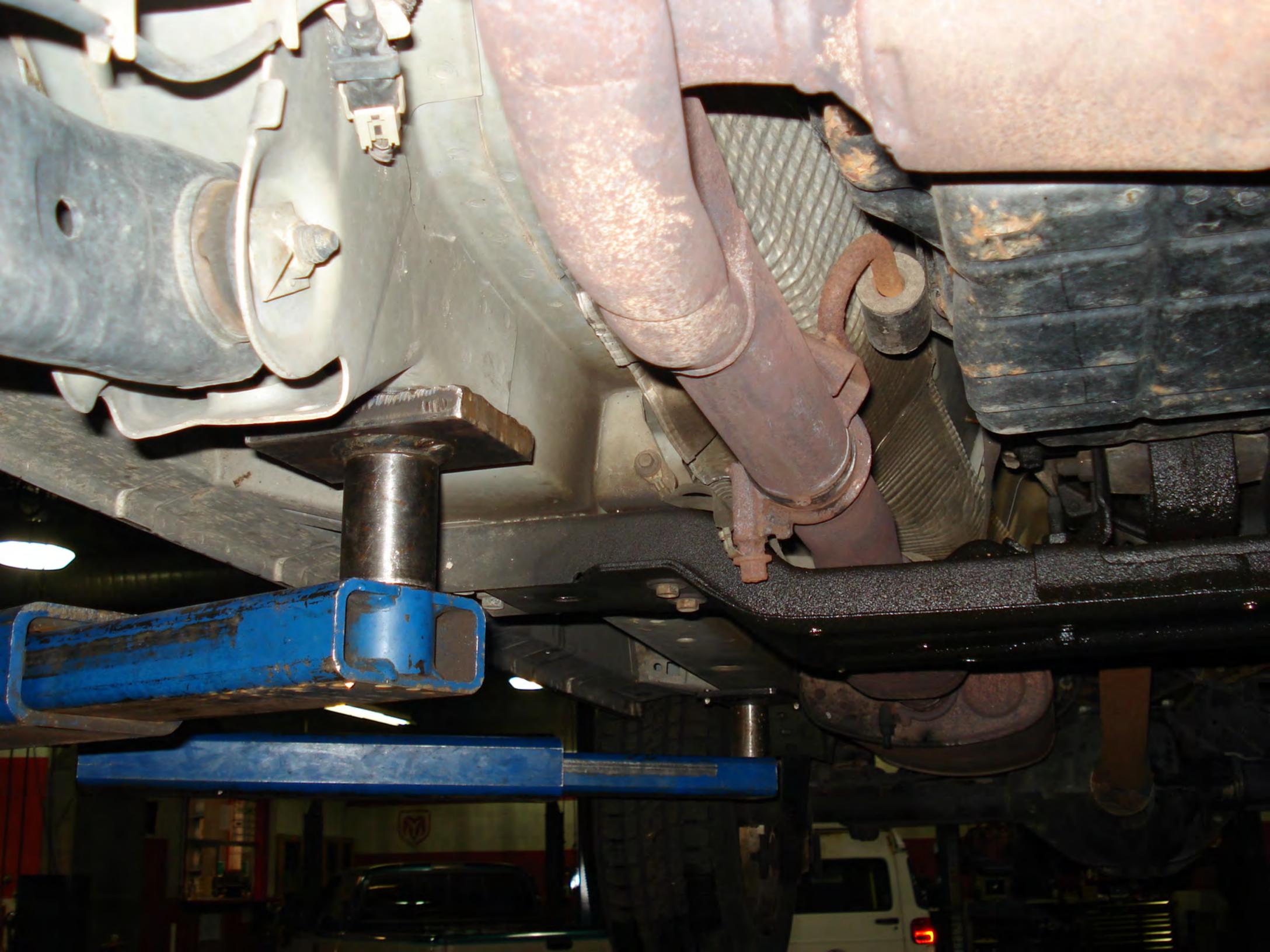


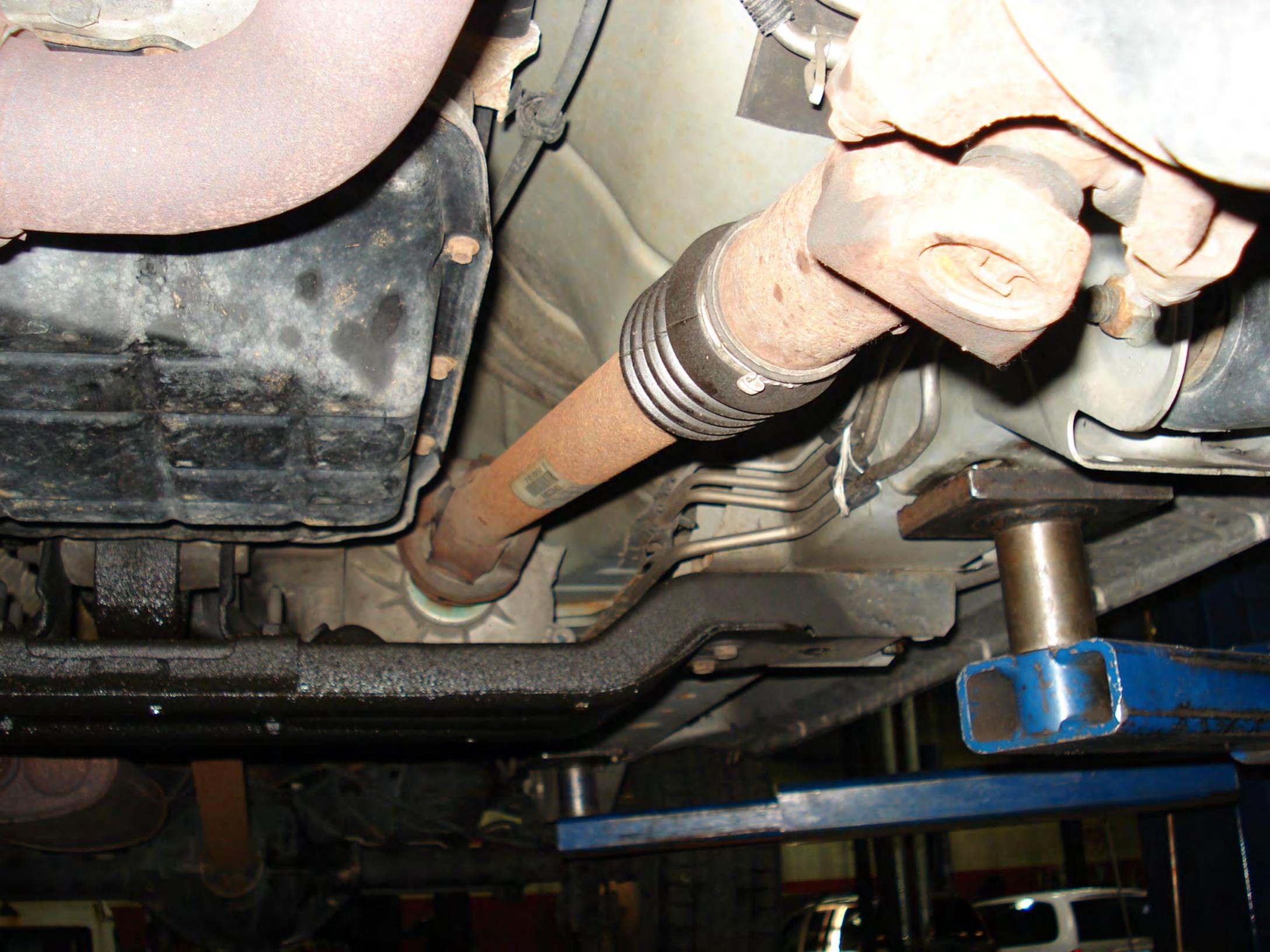
















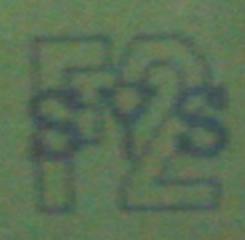




AIRBAG Module Information
Body Style: WJ
Part#: 56010485AC
S/W Version: 04.20

Front Dr and Pass/PCI Bus SAB and Lamp Dr w/On/Off Sw or AOSIM ORC Not Configured for Side Airbags No Airbag On/Off Switch







## ORC DICS 1 of 1 INTERNAL 1

ORC DTCs 1 of 6

INTERNAL 1

MINUTES: 60 IGN CNTS: 0

DTC 2 of 6 ---

DRIVER SOUIB 1
SHORT TO GROUND
MINUTES: 2'IGN CNTS: 11

-- ORC DTCs 3 of 6 --

PASSENGER SOUTB 1
SHORT TO GROUND
MINUTES: 2 1GN CNTS: 11

E-DTC 4-of 6

PASSENGER SOUIB 2
CIRCUIT OPEN
MINUTES: 1 IGN CNTS: 11

-- ORC DTCs 5 of 6 --

DRIVER SQUIB 2
SHORT TO GROUND
MINUTES: 2 IGN CNTS: 11

PASSENGER SQUIB 2
SHORT TO GROUND
MINUTES: 2 IGN CNTS: 11

### 

Item 1 of 4 順節 野路。個的

IRC

Vin	1J4GW58NX	30	Open Date	11/16/2009	Built Date	10/11/2002	
Model Year	2003	Body	WJJP74	JEEP GRAND CHEROKEE LIMITED 4X4 SPORT UTILITY 4-DR			
In Service Dt	04/07/2003	Mileage	87,000	Dealer Zone	51	CHICAGO	
Plant	С	JEFFERSO ASSEMBLY		Market	U	US	
Color	PSB	BRIGHT SILVER METALLIC CLEAR COAT					
Engine	EVA	ENGINE - 4.7L POWER TECH V8					
Transmission	DGQ	TRANSMISSION-5-SPD AUTOMATIC 5-45RFE					
Dealer	62971	WALTON ON DEMPSTER INC					
Dealer Address	5050 DEMPSTER ST						
Dealer City	SKOKIE			Dealer State	IL	Dealer Zip	60077
Owner						Contact Type	TELEPHONE
Address						Home Phone	
	PARK CITY L				Country	UNITED	

their own.

injury from airbag, no accident

Who is calling and what is their contact information?Owner spouse

Preferred Alternate:

2. What happened?Owner was driving and saw Air Bag light come on and then within 3 seconds both air bags deployed by itself. Owner put up hand to block and hurt hand and cracked windshield. Owner then drove home.

3. What is the current location of the vehicle? Home Address

Product - Unknown - Unknown - Accident - Default

Corporate - Property Damage - Default - Default - Default

### PARK CITY, UT-

Deployment - Both

Per OGC Matrix, reassigned to 82T. JSS15.

11/17/09 ASSIGN TO TNT16.

CAIR NUMBER 19094272 REQUEST EAA INSPECTION 11-17-2009 11:51

CAIR NUMBER 19094272 E-MAIL SENT TO EAA 11-17-2009 11:51

CCRG Open Date: 11/17/2009 10:13:29

Letter Sent: Denial 11/18/2009

Letter Sent: Acknowledgement 11/18/2009 09:32:33

PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 11/24/09 AT 14:42:57 19094272

Customer called in stating that someone was supposed to be giving him a

call back by today. Writer told him that it looks like they are still

working on his case and should be called back by today or Friday.

Customer was seeking a case update. Writer informed the customer that she

should receive a letter.

Customer called in requesting update on case status, Writer advised customer to check back on monday for further information, Writer informed we are waiting for image to post.

Caller is seeking any new information. Caller states that they are

frustrated because they feel that they have been given the run around.

Caller also mention that her husband is an attorney and will take action

if they have not received a answer soon.

Agent stated that at this time there is no new news and CSC is just the mediator and does not make any offers as to a settlement. Caller will try back tomorrow for any new information.

Customer states he did not receive letter mailed 11/18/09. caller transferred to extension 66079.

\*\*\*\*\*\*\*Supervisor Call\*\*\*\*\*

The customer Mr. Brosnan stated that he is fustrated that he has not recieved an answer from Chrysler. He stated that he has been promised a callback. Writer is reassigned to 82S please contact the customer at

\*

Per OGC Matrix, reassigned to 82T, JSS15. 12/7/09 UPDATED CCRG FILE. TNT16/LSE6

Katie from Central Collision in Salt Lake City, Utah, called stating that they have a vehicle that had the airbags deploy while the customer was driving. Katie states that an inspector from Chrysler came and looked at the vehicle while it was at a dealership. Caller seeking if she can speak with the inspector or get some information concerning the inspection. Agent informed caller that as that information is proprietary information, the CAC is unable to provide it. Agent informed caller that if she needs to get that information she will need to go through legal channels.

Katie stated that is what she needed to know.

# EA12-001 CHRYSLER ENCLOSURE 4 LEGAL WJ



Arbitration Forums, Inc. Atlanta Data Center PO Box 105517 Atlanta GA 30348-5517





## ARBITRATION APPLICATION

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DACCES1

### **AUTOMOBILE SUBROGATION ARBITRATION FORUM (A-FORM)**

Docket #: A001-00951-08-00

**Auto-Form** 

This is a Binding arbitration. Nonmembers answering are bound by this decision.

**Online Filing Form** 

Data Center: Atlanta Data Center

PO BOX 105517

Atlanta GA 30348-5517

Р	rin	ted	Date	06/	10	/2008	Ì
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Telephone: (888)-272-9338

Check if Counterclaim (Rule 3-8)

I. APPLICANT INFORMATI	ON and ALLEGATIONS (Rule 2-2)
Company Code Billing Code G09001	Company Claim Amount \$ \$2,892.76
Company/Subsidiary Name HANOVER INSURANCE COMPANY	Insured Deductible \$ \$300.00
Representative SANDRA PUCHEK	Legal Fees Sought \$0.00
Rep. Address 440 LINCOLN ST	
WORCESTER, MA 01653-0002 US	i request One Year Deferment (Rule 2-11).
	I request Notice of Hearing (Rule 3-1).
Telephone Number 800-628-0250 x2224	I request a Three Person Panel (Rule 3-3).
Fax Number 508-926-2070	This file will be represented in person (Rule 3-7).
	Automatic Counter Response
Insure	Attach Contentions Sheet
File Number 29486663	Administrative Requests
Date of Loss 8/15/2007	CERTIFICATION OF SERVICE The Applicant certifies that requirements
City MONTGOMERY State AL	of Rule 2-2 and condition precedent have been fulfilled.
LOCATION OF ACCIDENT .	06/09/2008
	Signature Dete
II. RESPONDENT INFORMAT	ION and ALLEGATIONS (RULE 2-3)
Respondent #1	
Subsidiary Name 01504-0003 DAIMLER CHRYSLER	RESPONDENT# and COMPANY CODE -
Rep. Name M.R. PORTER	Yes No Is the listed "Insured" an insured or self-insured
Rep. Address PO BOX 218004 AUBURN HILLS, MI 48321-	Yes No Is the listed "Insured" an insured or self-insured under your policy or contract?
File # 16632625	Yes No Has coverage been denied for this claim?
Insured DAIMLERCHRYSLER	If yes, a copy of the denial letter must be attached.
	l admit % liability
	Liability Deductible
	I request One Year Deferment (Rule 2-11).
	I request Notice of Hearing (Rule 3-1).
	I request Three Person Panel (Rule 3-3).
,	This file will be represented in person (Rule 3-7).
	COMPLETE THE FOLLOWING TO FILE A COUNTERCLAIM
	Yes, I would like to file a Counterclaim (Rule 2-3)
	Company Claim Amount \$
	Insured Deductible \$
	Legal Fees \$
•	I will accept policy limits (Article Second(d))
	Attach Contentions Sheet
	CERTIFICATION OF SERVICE: The Respondent certifies that requirement
	of Rule 2-3, and condition precedent have been fulfilled.
	Signature Date
	Telephone Number
	Fax Number

Docket #: A001-00951-08-00

### AUTOMOBILE ARBITRATION CONTENTIONS SHEET

(Required per Rules)

File provided by: Applicant

Date Printed 06/10/2008

Company Name: 00709 - 0007 HANOVER INSURANCE COMPANY

Insured:

File# 29486663

### AFFIRMATIVE DEFENSES/PLEADINGS:

### **DEFERMENT JUSTIFICATION:**

### Contentions: COMPLETE CONTENTIONS MUST BE SHARED WITH ALL PARTIES.

This loss occurred on 8/15/07, Rt 331, Montgomery, AL. The Applicant was driving slowly around a corner, speed of about 15-20 mph. The Applicant driver then heard a humming sound that was high pitched and had their hands on the steering wheel. Within seconds both airbags deployed and caused damaged to the passenger side windshield. The Applicant then drove the auto to the dealership.

The Applicant carrier contacted an expert to inspect the vehicle. An initial system analysis test did not reveal any DTCS detected in the ACM. This is unusual as it would typically recognize a normal deployment has occurred and would set DTCS as a diagnostic and repair feature.

It was not until a second system analysis test after the vehicle had been operated another 402 miles by it's owner that a DTC was detected. This should not be the case.

This code could have set as a result of the deployment of the air bags, as the ACM should recognize the deployment and will require replacement as a result of the deployment. This intermittent scenario suggests strongly that either the ACM or its circuitry are faulty and the cause of the deployment.

The conclusion of the expert report confirmed that the deployment was caused by a latent defect in the air bag system or the ACM itself and not due to the result of a collision impact, an outside source or repairs to the A/C circuit. There is absolutely no evidence to support that the deployment was caused by something that broke the windshield but in fact the windshield damage is 100% consistent with deployment-related contact by the dash trim/flap.

The Applicant is seeking full recovery of the damages that were caused by the manufacturer defect.

Docket #: A001-00951-08-00

### **AUTOMOBILE ARBITRATION CONTENTIONS SHEET**

(Required per Rules)

File provided by: Applicant	Date Printed 06/10/2008

Company Name: 00709 - 0007 HANOVER INSURANCE COMPANY

Insured:

File # 29486663

### **EVIDENCE:**

List evidence which will support contentions stated above (i.e., police report, damages, estimates, statements). Photocopies of evidence are suggested. Photos will not be returned without a sufficient size self-addressed envelope with adequate postage, per rules, Administrative Request Section below.

Adjusters Notes

INTERVIEW WITH APPLICANT DRIVER

- 2 Estimate of Repairs
- Expert Report
- Proof of Payment
- Vehicle Damage Photos
- **Denial Letter**

DENIAL FROM RESPONDENT FOR REPAIR

Rental Receipt

### **ITEMIZATION OF DAMAGES:**

Show math to support claim. Contested settlement value or disputed amounts must be itemized here for arbitrator consideration. If left blank, damages will not be considered an issue.

1. Auto Damage

WINSHIELD, AIRBAG INSTRUMENT PANEL

AND STEERING PANEL

2588.57

2. Rental

**RENTAL** 

\$304.19

\$2,588.57

12 DAYS @ 21.55 PLUS TAX

Total Itemized Damages (Excluding Salvage):

\$2,892,76

**Company Claim Amt:** 

Legal Fees Sought:

Insured Deductible:

\$2,892.76

\$0.00

\$300.00

### Administrative Requests:

PLEASE RETURN THE EXPERT REPORT AND PHOTOS

Page 2 of 2

Arbitration Forums, Inc. Atlanta Data Center PO BOX 105517 Atlanta, GA 30348-5517

TO: DAIMLER CHRYSLER
Attn: M.R. PORTER
PO BOX 218004
AUBURN HILLS, MI 48321

Date Printed: 06/10/2008

Attached is an Application and Contentions Sheet for a case filed against your company in Arbitration Forum's Online Filing Program. This notice is being delivered on behalf of the Applicant/Company 1 via AF's Notification Service. The Docket Number, Hearing Date, and Last Day to Respond are listed below. You can view more information about this case by visiting AF's website at www.arbfile.org.

### -Case Information-

Docket Number: A001-00951-08-00

Hearing Date: 08/14/2008

Hearing Type: SCHEDULED HEARING

Last Day to Respond: 07/30/2008

Reminder: A copy of your Response and Contentions MUST be received by AF and all parties involved on or before the last day to respond listed above.

December 19, 2007

Ms. Patricia Neale The Hanover Insurance Group 440 Lincoln Street P.O. Box 15149 Worcester, MA 01615

RE: Owner:

Our File No.: 16632625 V.I.N.: 1J4GW48S53C

Dear Ms. Neale:

This will acknowledge and respond to your subrogation package, received in this office December 17, 2007.

I have had the opportunity to review the information contained in your file, and must advise you that I am not convinced of a manufacturer's responsibility.

With this in mind, I can only suggest arbitration as your next logical step.

Chrysler is a member of the Inter-Insurance Company Arbitration System. If your company is also a member and if you still believe we are liable for your insured's loss, the claim is subject to arbitration. Chrysler's copy of the arbitration application should be sent to:

Chrysler 1000 Chrysler Drive Auburn Hills, MI 48326-2766 Attention: Warranty Litigation Dept. CIMS: 485-13-32

Thank you for the opportunity to review this matter with you.

Sincerely,

M. H. Martell Special Investigations (248) 944-7038

MHM/kat