

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

EA12-001

CHRYSLER

ENCLOSURE 4

LEGAL

KJ

Prior to 10.4.11

Customer Assistance Inquiry Record (CAIR)#

21069618

Vin	1J4GL48K5 2W [REDACTED]	Open Date	07/05/2011	Built Date	10/31/2001
Model Year	2002	Body	KJH74	JEEP LIBERTY SPORT 4X4 SPORT UTILITY 4-DR	
In Service Dt	01/30/2002	Mileage	90,000	Dealer Zone	35 WASHINGTON
Plant	W	TOLEDO NORTH ASSEMBLY PLANT	Market	U	US
Color	PB7	PATRIOT BLUE PEARL COAT			
Engine	EKG	ENGINE - 3.7L POWER TECH V6			
Transmission	DG4	TRANSMISSION-MULTI-SPEED AUTO, 45RFE			
Dealer	42786	MURRAY DODGE			
Dealer Address	1402 RIDGE PIKE				
Dealer City	CONSHOHOCKEN	Dealer State	PA	Dealer Zip	19428
Owner	[REDACTED]	Contact Type	TELEPHONE		
Address	[REDACTED]	Home Phone	[REDACTED]		
	WORCESTER PA [REDACTED]	Country	UNITED STATES		

Product - Body / Trim / Paint Finish - Air Bag - Activation - Front Drivers	Air bag deployed unintentionally
Product - Unknown - Unknown - Accident - Default	Air bag deployed unintentionally
Corporate - Property Damage - Default - Default - Default	

****Begin structured narrative T2 - Beginning Narrative

Briefly summarize why the customer is contacting Chrysler:
 Customer is calling because his son was driving the vehicle down I95 in delaware and the air bag deployed without the vehicle being in an accident.
 Customer stated that the vehicle was only going 35 MPH and after the air bag went off, the vehicle had to be towed to the dealership.
 Customer states that the vehicle is at a GMC dealership because he purchased the vehicle used from there.
 Briefly summarize what the customer is expecting:
 Customer is seeking Chrysler to fix the vehicle because the problem was no fault of his.

****End structured narrative T2 - Beginning Narrative

1. Who is calling and what is their contact information?

Preferred [REDACTED]

Alternate: [REDACTED]

2. What happened? air bag deployed without the vehicle being in an accident

3. What is the current location of the vehicle? The purchased dealership (GMC dealer)

Answer ID 18820

Writer tried to contact the customer at [REDACTED] but had to leave a message. Writer would like to know the location of the vehicle.

Caller requesting to speak with Case Manager, MC1157, not available.

Writer informed customer case has been assigned to: Jay? 248-944-7149
(7:30 am - 4:15 ET, M-F)

Customer states vehicle is at the Carfagno Chevy Dealership, Plymouth Meeting PA, 610-575-0507

Carfagno Chevrolet

1230 East Ridge Pike

Plymouth Meeting, Pennsylvania 19462

Service: (610) 275-0507

Owner leaves message indicating son was injured.

Per OGC Matrix, reassigned to 82T.

7.7.11 Assigned to LSE6. MJK

CAIR NUMBER 21069618 REQUEST EAA INSPECTION 07-07-2011 11:36

CAIR NUMBER 21069618 E-MAIL SENT TO EAA 07-07-2011 11:36

CCRG Open Date: 07/07/2011 08:31:07

Letter Sent: Acknowledgement 07/08/2011 09:18:42

PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 07/11/11 AT 19:39:39 21069618

ANTHONY TAORMINA called in to find out how long it will take for legal to contact him back. Writer advised we dont have a phone number to transfer.

Customer would just need to wait to be contacted

Letter Sent: Denial 07/15/2011

The caller is requesting to speak to someone about this issue. The caller states that if it is determined that the aftermarket radio is at fault,

he states that he does not accept that reason. The caller is requesting to speak to someone from the legal department.

Agent reopened CAIR and reassign to MJK32 for follow up.

Customer [REDACTED] calls to speak with their Case Manager tired of waiting for legal to contact him back he does not want to go to an attorney but will if he has to.

Writer gave phone number per line 50, JSS15 - [REDACTED] (7:30 am - 4:15 ET, M-F)

Customer [REDACTED] called that number while he kept writer on the line and left them a message at the legal department, now demands a supervisor, no one from the legal department he stated calls him back, he is demanding supervisor.

Writer informed customer that legal department is higher than us, we do not have a supervisor that is higher or over them, he will still need to contact that department at the number he is given.

Customer hung up.

Customer contacted back and requested president of the company. CSR told customer the contact information for the president is not provided to CAC. Customer was then told about the letter that was sent 07/15/2011 (line 45) and to allow more time for the letter to be received. customer requested information on the letter. CSR told customer that the letter is information strictly for his self the customer and the legal department.

7.21.11 Please send all CAIRS through Special Investigations. MJK _

McGRORY WENTZ, LLP

ATTORNEYS AT LAW

SUITE 100
115 WEST GERMANTOWN PIKE
NORRISTOWN, PA 19401-1381

FREDERIC M. WENTZ

TEL: 610-279-2480

FAX: 610-279-2401

August 9, 2011

The Customer Claims Resolution Group
Office of General Counsel
Chrysler Group LLC
1000 Chrysler Drive
Auburn Hills, MI 48326

RECEIVED
AUG 11 2011
CCRG
Office of the General Counsel

Attention: Lauren

Re: Case No. 21069618

Dear Lauren:

Please be advised that I represent [REDACTED] the owner of a Chrysler vehicle regarding the above captioned matter.

As you are aware, the air bag inflated without any known reason. When Mr. [REDACTED] made a claim against Chrysler to pay for the cost of the repair of the air bag, Chrysler sent an inspector out to look at the car. By letter dated July 15, 2011 Mr. [REDACTED] was informed that your inspector found after market wiring attached to the air bag control module mounting bolt, and, therefore, you were denying warranty coverage.

Mr. [REDACTED] then took the vehicle to Carfagno Chevrolet, from whom he purchased the vehicle. It was inspected by Carfagno Chevrolet and they found that there was no relationship to the after installed radio and the deployment of the air bag.

August 9, 2011

Page 2

Mr. [REDACTED] then took the vehicle to Bergeys Chrysler Jeep Dodge in Souderton, Pa., where the mechanic removed the radio, glove box and center console and inspected wiring from the radio to any air bag wiring, and found that nothing was tapped into or was wired into the air bag system.

Mr. [REDACTED] then made a claim against Best Buy who hired an independent inspector to inspect the vehicle. The independent inspector found no indication that any wiring that Best Buy installed caused the air bag to deploy. The inspector also stated that none of the air bag wiring was touched at all.

I enclose herewith the reports of Carfagno Chevrolet, Bergeys Chrysler and Gallagher Bassett Services, Inc. the independent inspector hired by Best Buy.

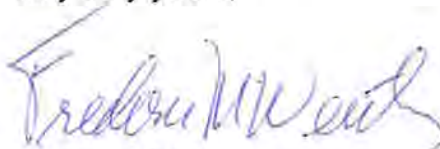
Mr. [REDACTED] is presently having the car repaired at Bergey's Chrysler Jeep Dodge, and now looks to Chrysler to make good on the damage and concomitant expenses.

Mr. [REDACTED] has been forced to rent a vehicle as a result of Chrysler's denying immediate repairs to his vehicle, and we look to Chrysler to make good on those damages as well as tow charges and legal fees.

If I have not heard from you in the next ten (10) days, we will do whatever we think is appropriate under the circumstances.

Thank you for your courtesy.

Very truly yours,



Frederic M. Wentz

FMW/tmw

Encs.

cc: [REDACTED]

SENT VIA FEDERAL EXPRESS MAIL

CARFAGNO CHEVROLET

1230 E. Ridge Pike - P.O. Box 530
 PLYMOUTH MEETING, PA. 19462-0530
 Phone (610) 275-0507
 www.carfagnochevy.com



GENUINE CHEVROLET



GENUINE CHEVROLET

CUSTOMER NO. 7566	ADVISOR ZANFRA	TAG NO. 41202	INVOICE DATE 07/08/11	INVOICE NO. CVCS176362
	LABOR RATE	LICENSE NO.	90,828	COLOR BLUE/
	YEAR / MAKE / MODEL 02 / JEEP / LIBERTY/4 DOOR UTILITY	DELIVERY DATE 09/21/06	DELIVERY MILES 41,266	STOCK NO. 1969F
WORCESTER, PA	VEHICLE I.D. NO. 1 J 4 G L 4 8 K 5 2 W	SELLING DEALER NO.	PRODUCTION DATE	
	F.T.E. NO.	P.O. NO.	R.O. DATE 06/30/11	
	COMMENTS			

MO: 90828

LABOR: #1 55CVZD1 INSPECT RESTRAINTS TECH(S) 700 96.00

CHECK AIR BAG DEPLOYED WHILE DRIVING, TOWED IN.
 INSPECT UNDERSIDE OF VEHICLE FOR IMPACT DAMAGE.
 RAISE VEHICLE ON LIFT. NO SIGNS OF IMPACT SEEN AT
 THIS TIME FRONT OR REAR AIR BAG MODULE COMPLETELY
 INFLATED ON DRIVER SIDE. CUSTOMER TO CONTACT INSURANCE
 AND CHRYSLER CORP. FOR REPAIRS.

SUBLET-----PO#-----VEND INV#-INV. DATE-DESCRIPTION-----
 12098 07/05/11 TOWING FROM DELAWARE 310.00
 TOTAL - SUBLET 310.00

JOB# 1 TOTALS-----
 LABOR 96.00
 SUBLET 310.00
 JOB# 1 JOURNAL PREFIX CVCS JOB# 1 TOTAL 406.00

TOTALS-----
 PAYMENT METHOD
 [] Cash [] Charge [] Check#
 [] C/Card By: Date: / /
 TOTAL LABOR... 96.00
 TOTAL PARTS... 0.00
 TOTAL SUBLET... 310.00
 TOTAL G.O.G... 0.00
 TOTAL MISC CHG... 0.00
 TOTAL MISC DISC... 0.00
 TOTAL TAX... 24.36

TOTAL INVOICE \$ 430.36

SERVICE & PARTS HOURS

Monday — Friday
 7:30 A.M. - 5:00 P.M.
 Saturday
 8:00 A.M. - 3:00 P.M.

EARLY BIRD/LATE NIGHT
 DROP OFF AVAILABLE

YOUR STATE INSPECTION

IS DUE / /

Goodwrench Service

- ASE CERTIFIED TECHNICIANS
- CONVENIENT SERVICE HOURS
- COMPETITIVE UP FRONT PRICING
- COURTESY TRANSPORTATION
- LIMITED LIFETIME SERVICE GUARANTEE

LIMITED LABOR WARRANTY
 THE REPAIR FACILITY GUARANTEES THE LABOR USED IN PERFORMING THE REPAIR LISTED ON THIS REPAIR ORDER FOR A PERIOD OF 18 MONTHS OR 18,000 MILES FROM THE DATE SUCH REPAIRS WERE COMPLETED. THIS LIMITED WARRANTY SPECIFICALLY INCLUDES FRONT END ALIGNMENTS, ELECTRICAL WIRING AND SHORTS, AND PULB SYSTEM WHEN DUE TO CONTAMINATION. THIS LIMITED WARRANTY IS EXTENDED TO THE VEHICLE OWNER/CUSTOMER AND IS NOT TRANSFERABLE TO, NOR ENFORCEABLE BY ANY OTHER PERSON.
 THE PART(S) IS SOLD AS IS. THE ONLY WARRANTIES APPLYING TO THIS PART(S) ARE THOSE WHICH MAY BE OFFERED BY THE MANUFACTURER(S). THE SELLING DEALER HEREBY EXPRESSLY DISCLAIMS ALL WARRANTIES, EITHER EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND NEITHER ASSUMES NOR AUTHORIZES ANY OTHER PERSON TO ASSUME FOR IT ANY LIABILITY IN CONNECTION WITH THE SALE OF THIS PART(S) AND/OR SERVICE. BUYER SHALL NOT BE ENTITLED TO RECOVER FROM THE SELLING DEALER ANY CONSEQUENTIAL DAMAGES, DAMAGES TO PROPERTY, DAMAGES FOR LOSS OF USE, LOSS OF TIME, LOSS OF PROFITS, OR INCOME, OR ANY OTHER INCIDENTAL DAMAGES. IN ADDITION, EXPRESSLY EXCLUDED IS ANY DEALER LIABILITY FOR DEFECTS PERTAINING TO SAFETY OR PERFORMANCE, BY WAY OF STRICT LIABILITY, NEGLIGENCE OR OTHERWISE.

Thank you very much for bringing your vehicle home for service — It was a privilege to have served you!

CARFAGNO CHEVROLET
 (610) 275-0507

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



- SERVICE
- PARTS
- TIRES
- QUICK LUBE

Chrysler Jeep Dodge

408 HARLEYSVILLE PIKE
SOUDERTON, PA 18964

SERVICE ON ALL MAKES & MODELS

bergeys.com

HOME PHONE NO.	CELL PHONE NO.	WORK PHONE NO.	PURCHASE ORDER NO.	DATE	INVOICE NO.			
				08/01/2011	RR420919C			
YEAR	MAKE	MODEL	LICENSE NO.	STATE	COLOR	PLATE	OFFICE	SERIAL NUMBER
2002	JEEP	LIBERTY			BLUE			1J4GL4BK52W
23176 Del. date: CARFAGNO CHEVROLET 1230 EAST RIDGE PIKE PO BOX 530 PLYMOUTH MEETING, PA 19462-0530			M.I. AGENCY		INSUR. ADVISOR		VEHICLE NO.	
			90848		2755			
			MILEAGE OBT.		PARKING SPOT OUT		DUE DATE	

*** Repair order date: 07/27/2011

Job# 1

LABOR:

Concern: CUSTOMER REQUEST; THE AIR BAG CAME OUT WHEN
CUSTOEMR WAS DRIVING THE VEHICLE - (CHRYSLER SENT
OUT ADJUSTER TOO LOOK AT - FOUND A/M RADIO WIRES
INTO AIR BAG
INSTALL NEW AIR BAG AND MODULE AND REMOVE THE
RADIO WIRES FROM THE CIRCUIT

Correction: NEEDS:

LEFT SIDE AIR BAG, AIR BAG MODULE, LEFT FRONT SEAT
BELT AND CLOCKSPRING ASSEMBLY.
\$1852.20 + TAX
(LABOR \$333.00 PARTS \$1519.20)

Comments: REMOVED THE RADIO, GLOVE BOX AND CENTER CONSOLE
AND INSPECTED WIRING FROM RADIO TO ANY AIR BAG
WIRING AND DID NOT FIND ANYTHING TAPPED IN OR
WIRED INTO AIR BAG SYSTEM. TEST POWER AND GROUND
TO ORC (OCCUPANT RESTRAINT CONTROLLER) AND OK BUT
NO COMMUNICATION TO ORC....

Job# 2

LABOR:

Concern: CUSTOMER REQUEST; D/S SEATBELT WILL NOT PULL
OUT, IS THIS RELATED

TOTALS:

Please stop in at Bergeys again.

Customer Signature

AHN: Joe Burns

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

MAIL PAYMENT TO: Bergeys Inc. • 462 Harleysville Plke • Souderton, PA 18964



Gallagher Bassett Services, Inc.

August 9, 2011

[REDACTED]
Worcester, PA [REDACTED]

RE: Property Damage

Client: Best Buy
File Number: 169257-GK-01
Date of Event: July 9, 2007
Claimant: [REDACTED]

Dear Mr. [REDACTED]

This correspondence acknowledges your claim for damages arising out of the above captioned incident.

As you probably know, our obligation is to pay only those claims or damages when it appears our insured was legally responsible. In considering this responsibility, we must be guided by all information, which becomes available to us in the course of our investigation.

We have carefully evaluated your claim, and it is our opinion that the responsibility for this incident does not rest on our insured. I have received the paperwork back from the appraiser. He stated that the tech at Bergeys, Kevin, traced all of the wiring Best Buy installed. There is no indication that any wiring that Best Buy installed caused the air bag to deploy. Also stated that none of the air bag wiring was touched at all.

Therefore, we regret to inform you that we must respectfully decline to make payment on your claim. If you have any information to the contrary, we would be happy to reconsider our position.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi Cripps", with a horizontal line extending to the right.

Heidi Cripps
Claim Representative

7601 Penn Avenue South, B2-394
Richfield, MN 55423
Heidi_Cripps@gbtpa.com
612-291-4486 - Direct Phone
877-502-5498 - FAX

21069618

1429 KG(3150 LB) P215/75

THIS VEHICLE CONFORMS TO ALL A
PREVENTION STANDARDS IN EFFECT

VIN: 1J4GL48K52W [REDACTED] TYPE



MDH: 103119 387AA PNT:PB7 UEA



MPH km/h

TYPE 35

000000

TRIP

AIR
BAG







94001



T10046



Je Take
Your Vehic



Jeep

7052

12 12



7052

LIBERTY sport

Jeep



7052

161 12/15/12

Jeep

LIBERTY 2004

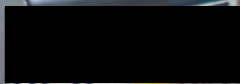


P

EAGLES

4x4

Jeep
CARFAGNO





P

EAGLES

LASALLE
EXPLORES

Jeep
CARFAGNO

3.7L

GOODYEAR
WRANGLER
SR-A





FUEL
CAUTION

SAE J1939



NO RESPONSE from ORC

Please make certain of the following items:

- 1) Ignition is turned on.
- 2) DRB III is properly connected to the Data connector.

F1
HELP

F2
SYS

F3
MAIN

64.1

Unable to ID Module for
ORC

press any key to continue

--- PCH DTC

NO DTCs DETECTED

Starts Since Clear : 65

Page back to exit

BCM Module Information

PART NUM: 05069131AE
2002 KJ Premium BCM

Country: United States
VIN 2W [REDACTED]



-- BCM DTCs 1 of 2 --

Tailgate Lock Motor",
"Short to Voltage

--- DTC 2 of 2 ---

Wiper Park Switch
Failure

AIRBAG DIAGNOSTICS

Determining Controller
Type

Please Wait...

F1
HELP

F2
SYM

F3
MENU

This Diagnostic Control
Module is not supported by
this software. Please use the
DRB III with the Supercard
software to diagnose this
vehicle.

F1
HELP

F2
F2

F3
MAIN











STANDARD
049





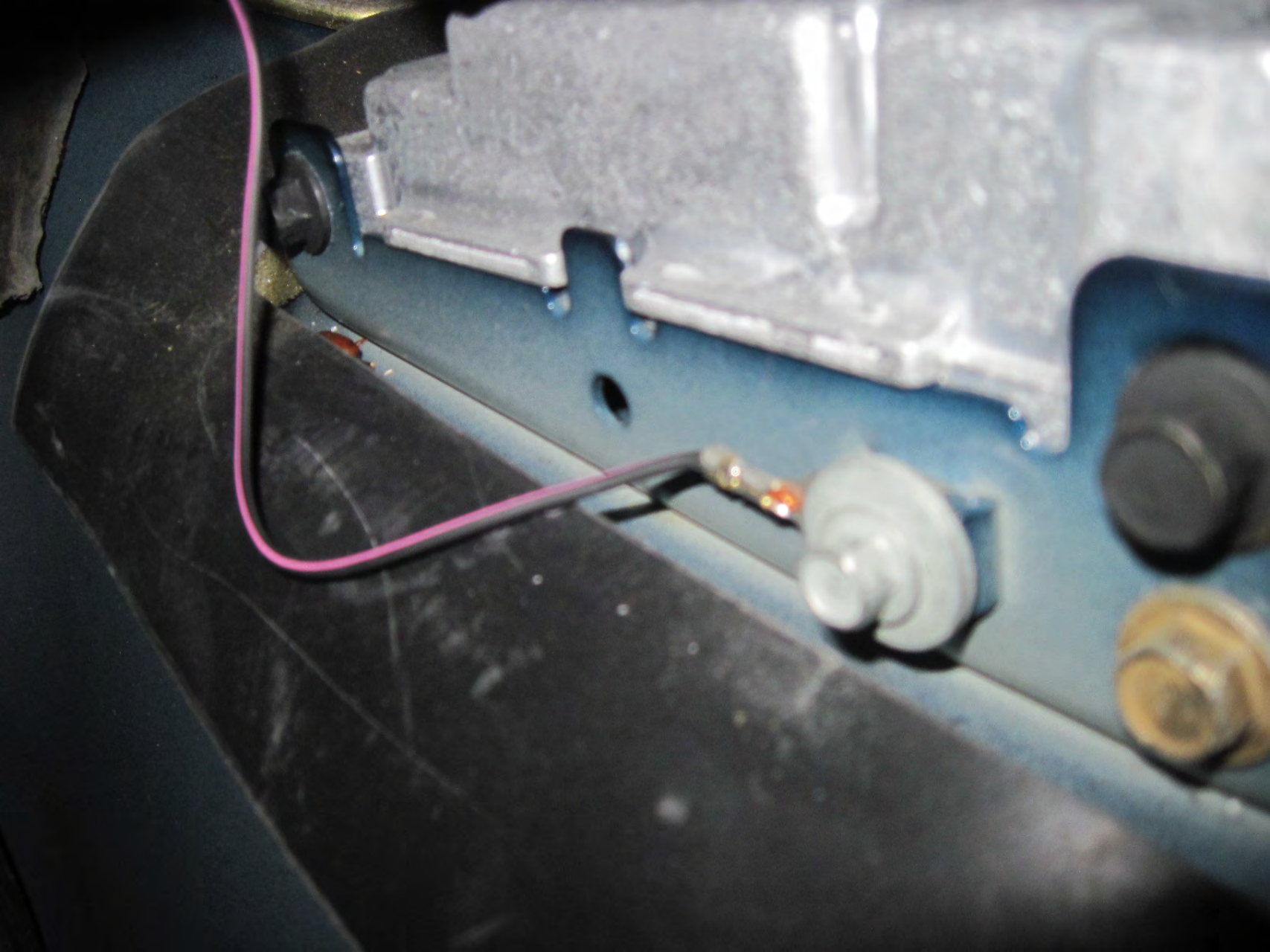




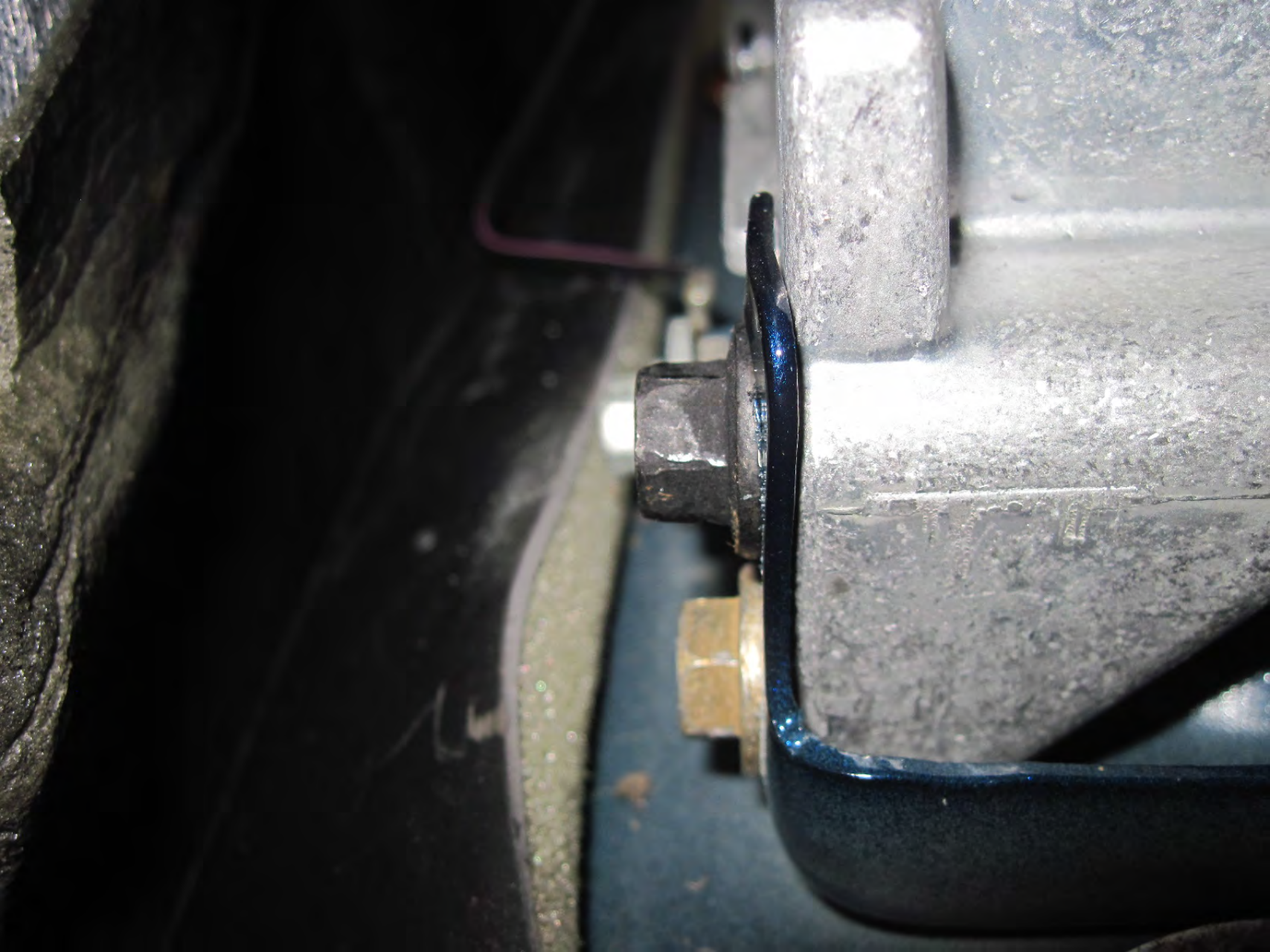






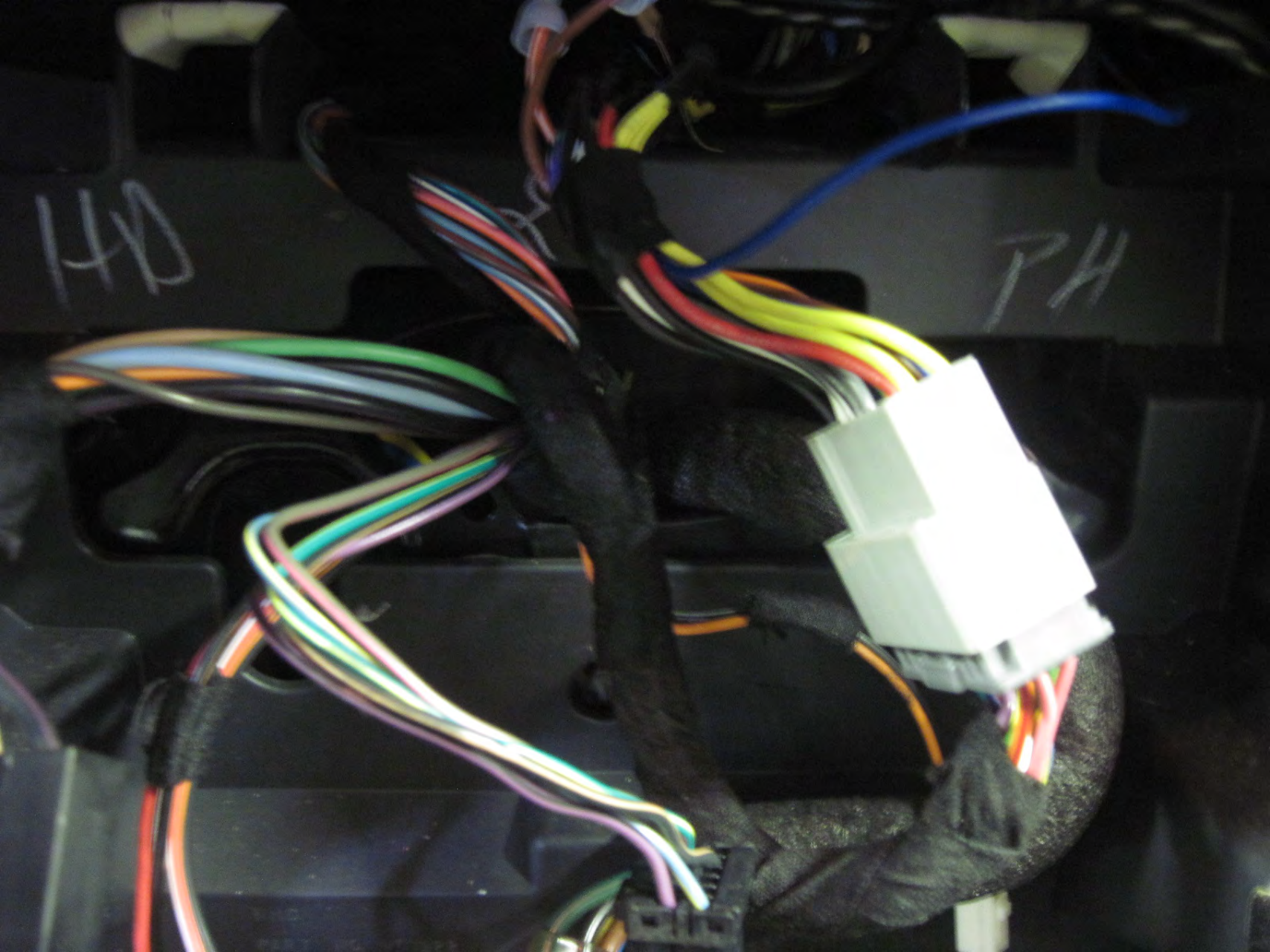






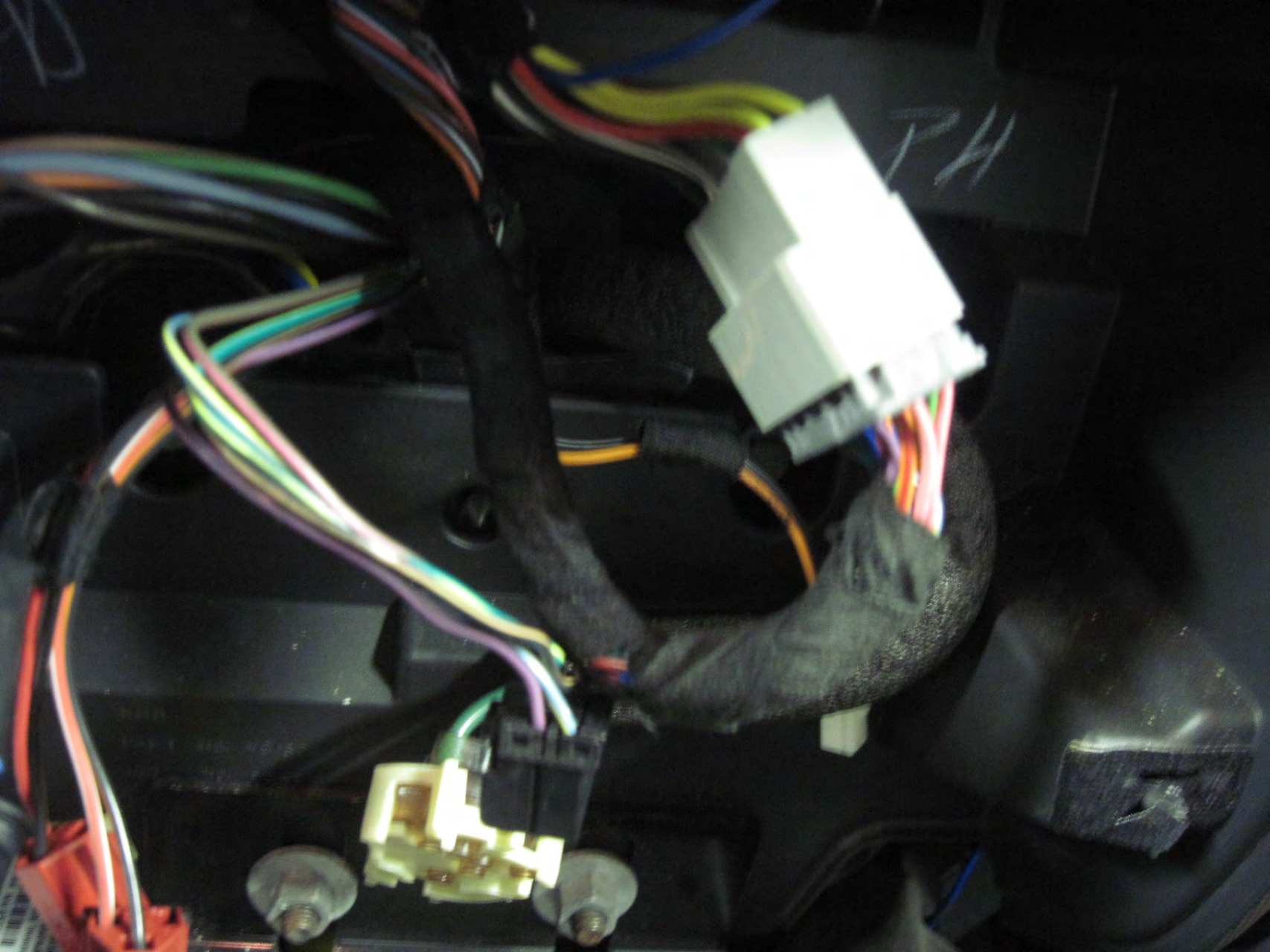


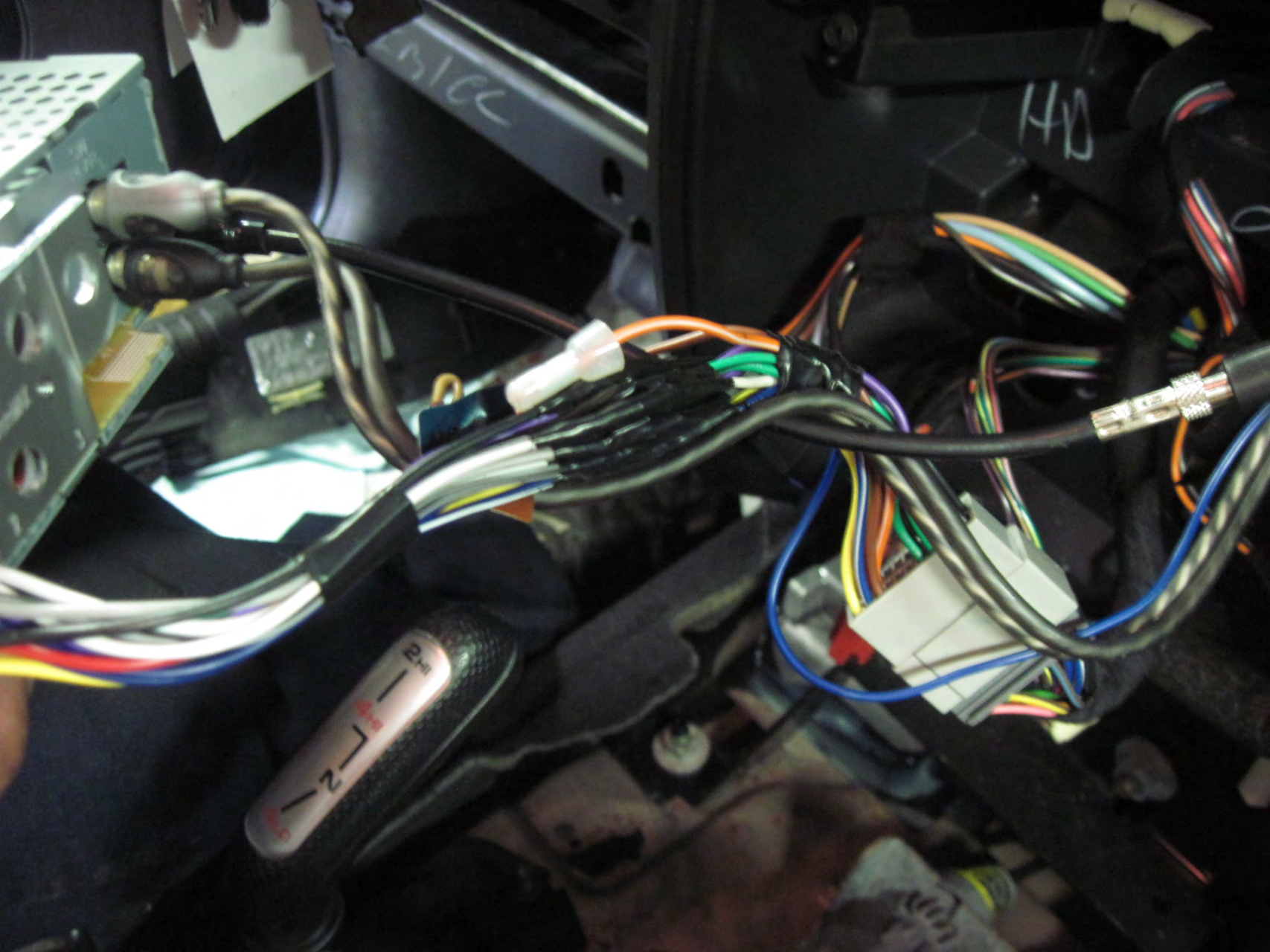




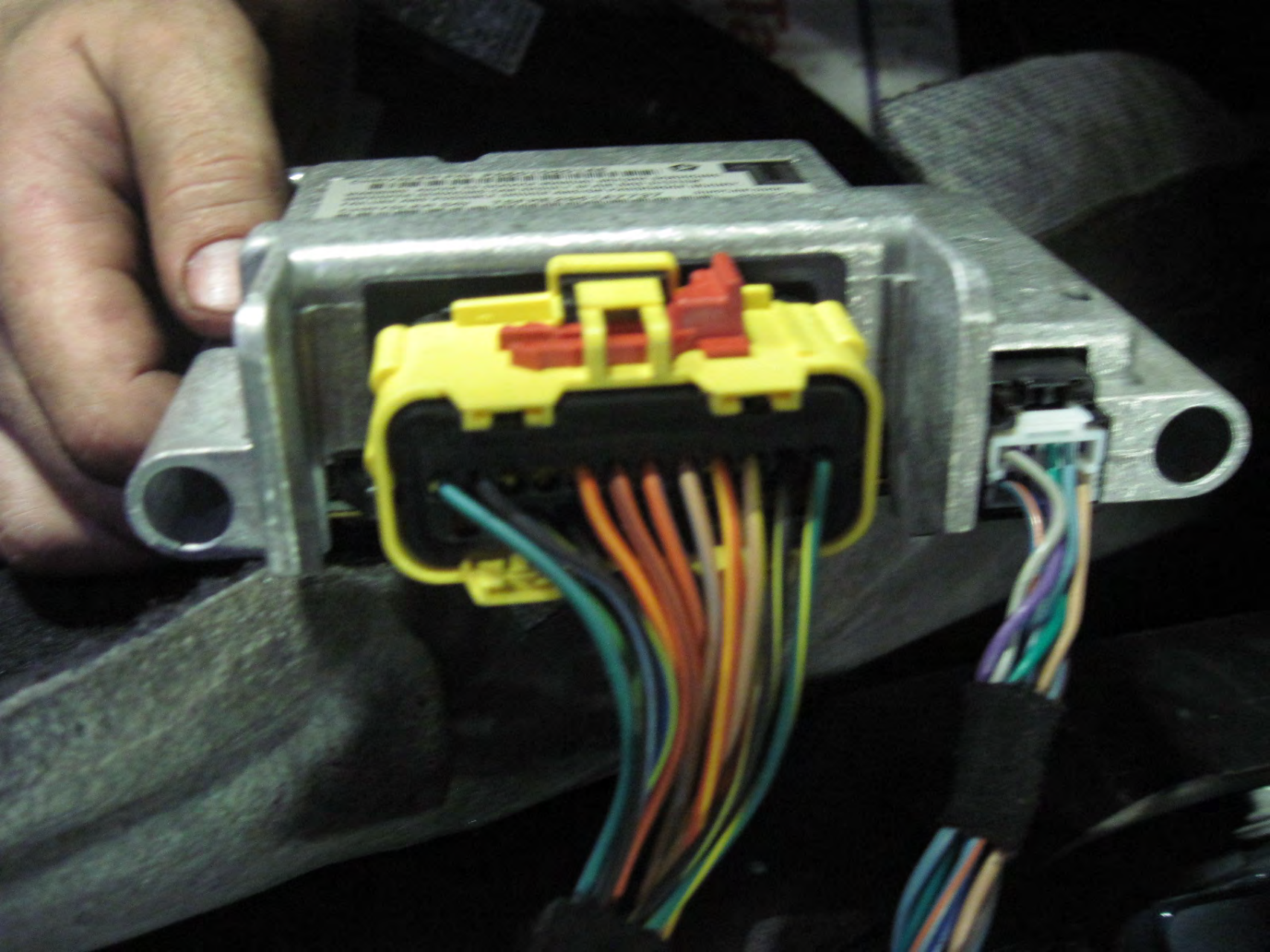
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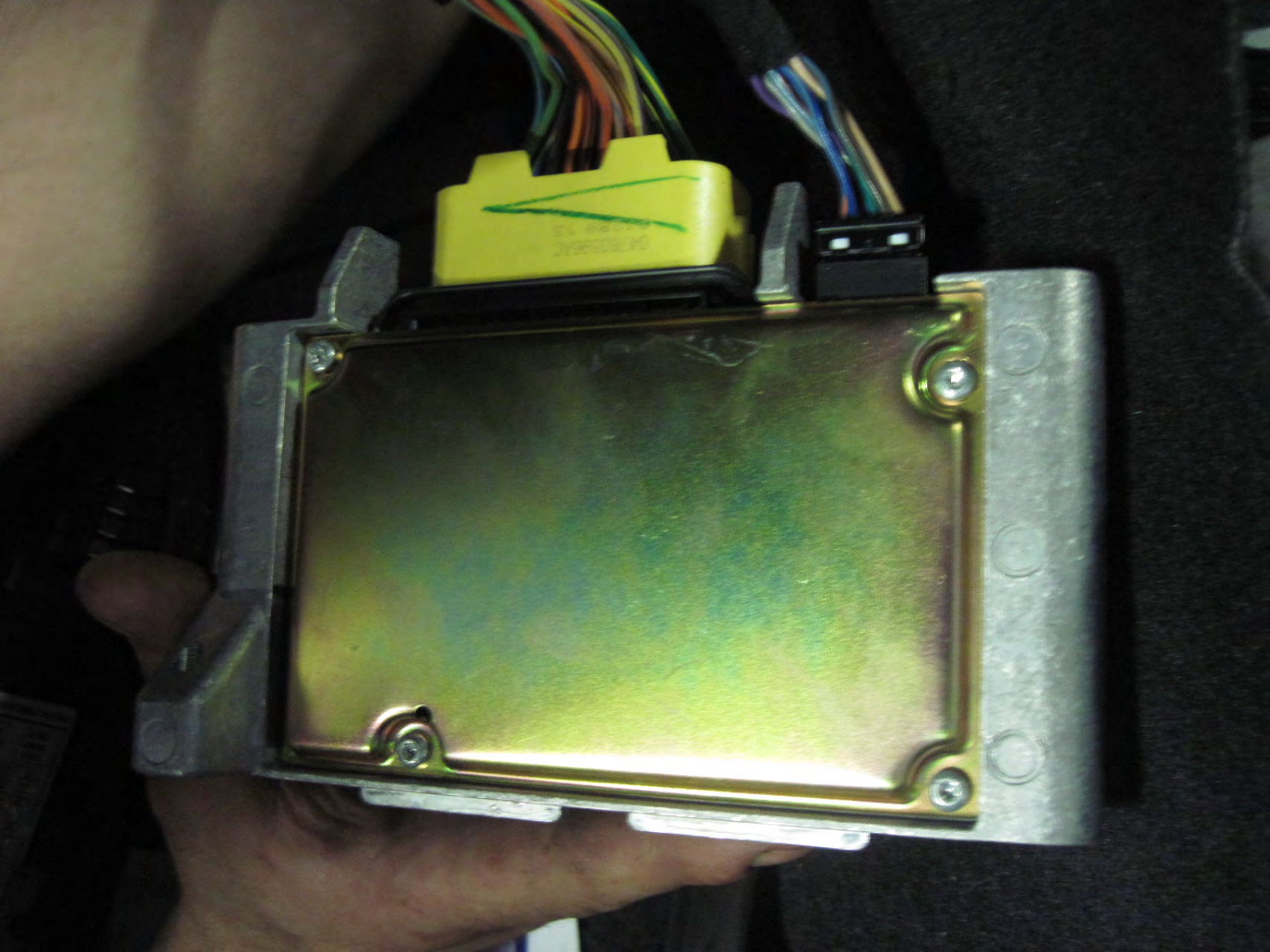
PH













10233x

Bottom View
30 67 67a 86



T11658
A24801

W2

50G317431RC
S4K23

ON - OFF
CRUISE
SET

RES + ACCEL
CANCEL
COAST



13/16

RECALL SERVICE

113
21



BRAED

IN EVENT OF FAILURE AS RO...
INSTALL ASSEMBLY UNLESS RO...

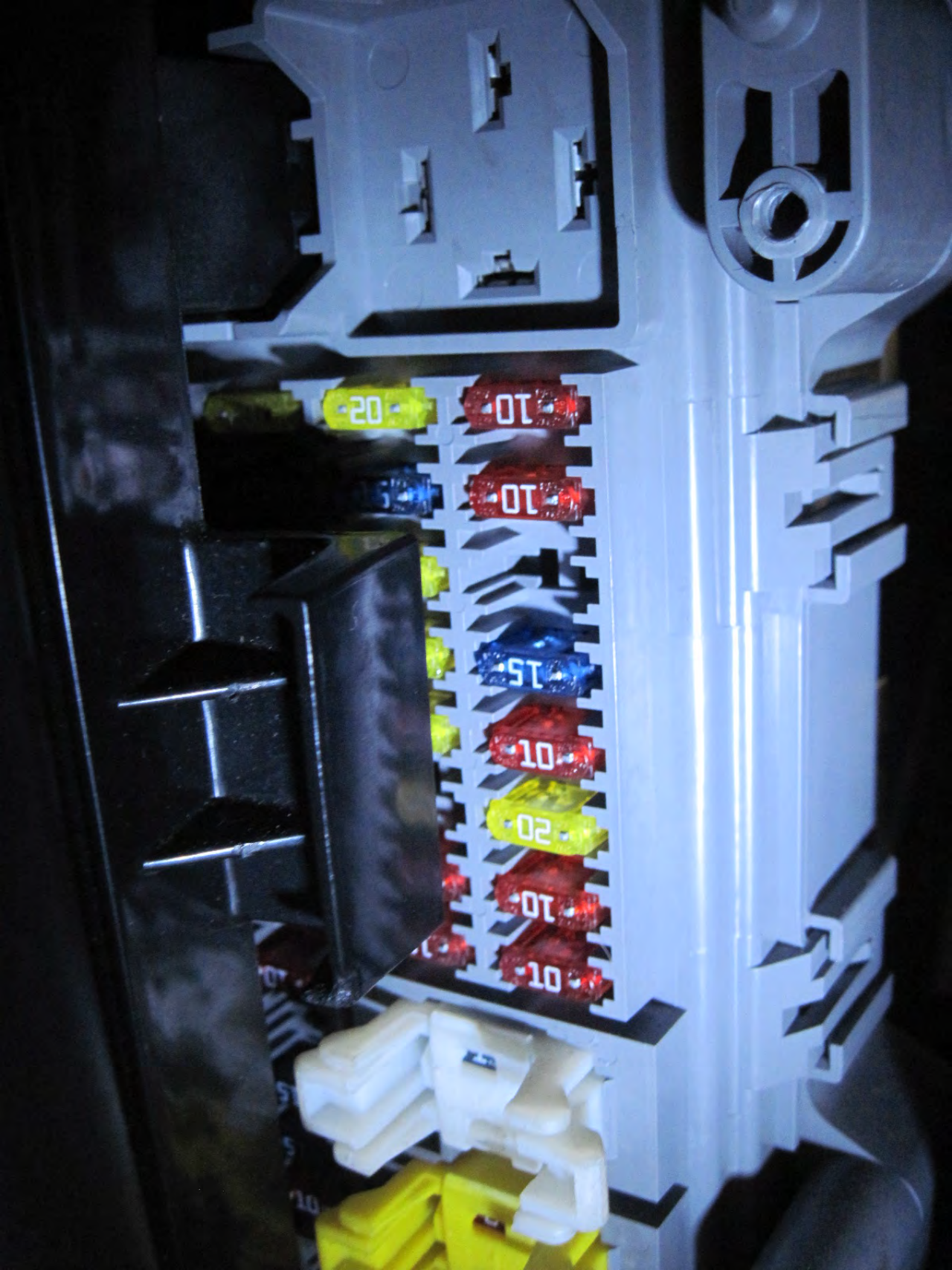
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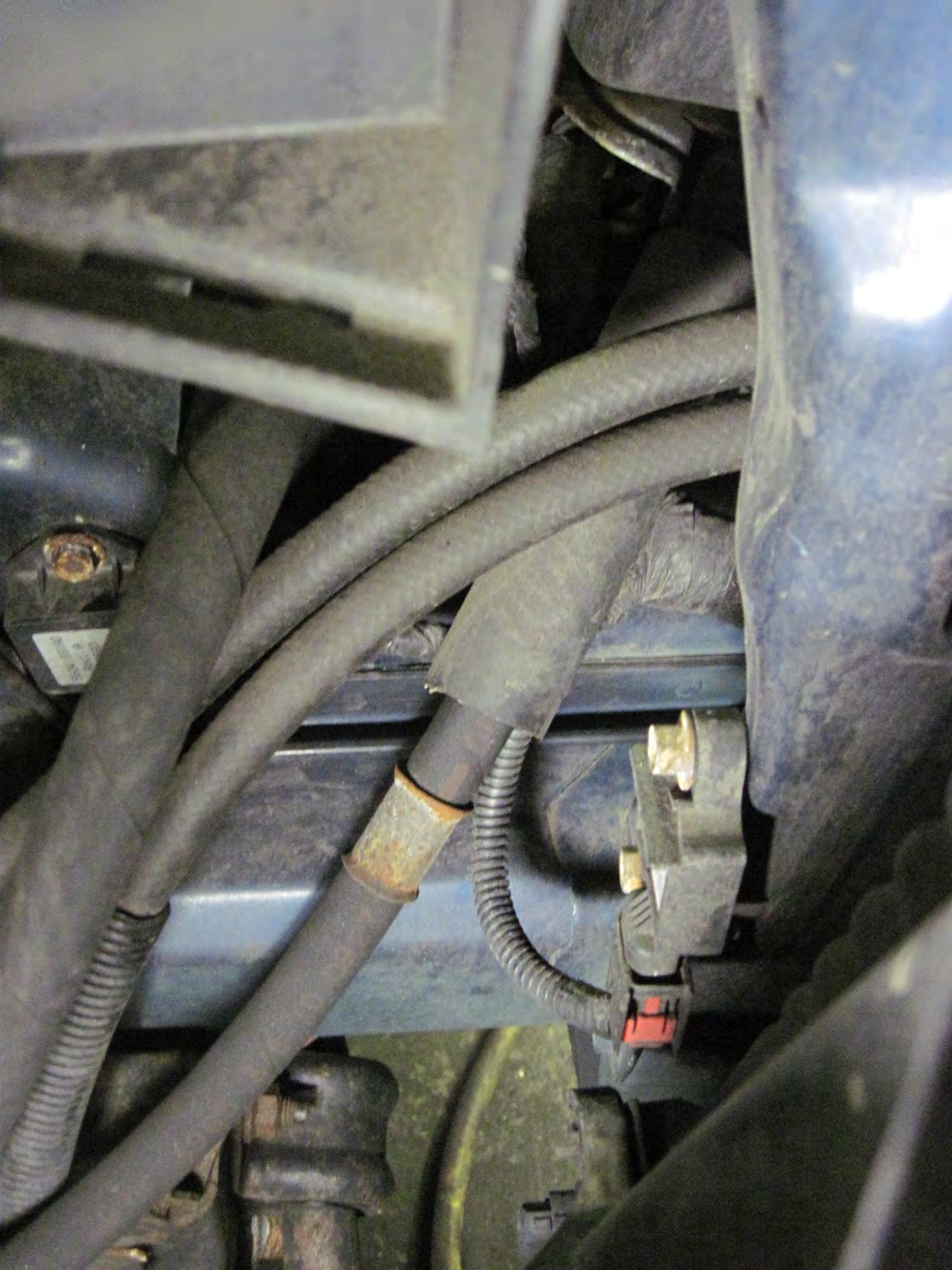
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EA12-001
CHRYSLER
ENCLOSURE 4
LEGAL
KJ
Prior to 10.4.11

Customer Assistance Inquiry Record (CAIR)#**16084665**

Vin	1J4GL58K9 2W [REDACTED]	Open Date	03/30/2007	Built Date	10/06/2001
Model Year	2002	Body	KJJP74	JEEP LIBERTY LTD EDITION 4X4 SPORT UTILITY 4-DR	
In Service Dt	11/13/2001	Mileage	86,769	Dealer Zone	32 NEW YORK
Plant	W	TOLEDO NORTH ASSEMBLY PLANT	Market	U	US
Color	PS2	BRIGHT SILVER METALLIC CLEAR COAT			
Engine	EKG	ENGINE - 3.7L POWER TECH V6			
Transmission	DG4	TRANSMISSION-MULTI-SPEED AUTO, 45RFE			
Dealer	37002	FITZPATRICKS INC			
Dealer Address	430 E MAIN STREET				
Dealer City	ANSONIA	Dealer State	CT	Dealer Zip	06401
Owner	[REDACTED]	Contact Type	TELEPHONE		
Address	[REDACTED]	Home Phone	[REDACTED]		
	NEW HAVEN CT	Country	UNITED STATES		

Product - Body / Trim / Paint Finish - Air Bag - Activation - Front Drivers	inadvertant air bag deployment
---	--------------------------------

file forwarded by STAR Center. owner alleges inadvertant air bag deployment
VEHICLE IS LOCATED AT:
FITZPATRICKS INC CJ
430 E MAIN STREET ANSONIA CT 06401 203-734-3318

PLEASE CONTACT AND ARRANGE INSPECTION TO DETERMINE IF OWNERS
ALLEGATION OF IMPROPER OPERATION OF SAFETY RESTRAINT SYSTEMS IS ACCURATE.
PLEASE PROVIDE COMPLETED PVIR, INCLUDING SECTIONS A, B, C, D, & J,
PHOTOS, DRB CODES, POLICE REPORT (if available), AND ANY OTHER PERTINENT
INFORMATION. THANKS. rab32.

CAIR NUMBER 16084665 REQUEST EAA INSPECTION 03-30-2007 12:59
CAIR NUMBER 16084665 E-MAIL SENT TO EAA 03-30-2007 12:59
PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 04/03/07 AT 15:10:28 16084665
4/4/07....NO DAMAGE WAS FOUND.....PLEASE REPAIR CAR FOR SAFETY AND GOOD
WILL. THANKS.
_4.04.2007

Roy,
Could you arrange to have the Airbag Control Module and Clockspring sent to
me at the below address, in addition to having the vehicle repaired?
Thanks for your assistance.
DaimlerChrysler Corp.
CIMS 482-00-91
800 Chrysler Dr.

Auburn Hills, MI 48326

Attn: Paul Plantinga

_called the dealer and notified them of the above request. Forwarded to the dealer. mrp

REASSIGNED TO BC/DLR 32 37002 04/04/07 14:36 O 16084665

Dealer call

Mike service director from dealer 37002. Calling seeking how he is going to get paid for repair. Mike requests to be contacted at [REDACTED]

Dealer 37002 call

Mike from dealer calling in seeking how he is to get paid for the air bag repair. Agent transferred Mike to Agent MRP1 voice mail.

*****DEALER CALL*****

Caller is Michael Fitzpatrick, service manager with dealership 37002.

Customer has picked up the vehicle. The repair is finished. The total cost of the repair is \$1375.15. Dealership seeking to get paid. ***Agent consulted with TLD50*** Dealer was advised of the reference number. Dealer was transferred to MRP1. Informed dealer to leave voice message with reference number and customer s name. Dealer agreed.

*** RO #276308 completed on 4/9/07 for \$1,375.15 @ 86,769 miles. ***

Preliminary Vehicle Investigation Report(PVIR)

Customer Assistance Inquiry Record (CAIR)#: 16084665

Year	Body	Vehicle Identification Number	Build Date	Odometer	In Serv. Dt.
02	JEEP LIBERTY LTD EDITION 4X4 SPORT UTILITY 4-DR	1J4GL58K92W [REDACTED]	10/06/2001	86,769	11/13/2001
Name of Owner		Address/Location		City	State
[REDACTED]		[REDACTED]		NEW HAVEN	CT
ZIP	Color	Model	Business Phone	Home Phone	
[REDACTED]	BRIGHT SILVER METALLIC CLEAR COAT	KJJP74		[REDACTED]	
Selling Dealer Name		Zone	Dlr. Code	City	State
FITZPATRICKS INC		32	37002	ANSONIA	CT
Inspector - Name Last,First, Middle			Inspector's Company		Inspector's Phone No.
Cannistra Nicholas E			EAA		845-462-4739
Damage Estimate				Repair Estimate	
<input type="radio"/> Minor <input checked="" type="radio"/> Moderate <input type="radio"/> Total Loss				\$ 0.00	

Interview

Interview With: Driver Owner Other Driver/Owner

Name: Last, First,Middle [REDACTED]

Interview Date:	Date Of Incident:	Time Of Incident	Inspection Date:
04/01/2007	03/28/2007	02:30 PM	04/02/2007

1. Driver's Description Of Event: **The driver stated that she was driving home and the air bag light came on she then turned into her street and the drivers air bag deployed. She then phoned her husband to help her out.**

Insurance Company Name: **Amprise**
 Personal Injury: Yes No
 Were there Personal Injuries?
 Any Indicator/Warning Lights on Prior? Yes No

If Yes, What light: **AIR bag Light on Dash**

Part A - GENERAL

REQUIRED PHOTOGRAPHS:

ALL FOUR SIDE VIEWS

IF CRASH DAMAGED:

PERSPECTIVE FROM EVERY CORNER OF VEHICLE DOWN BOTH ORIGINAL LATERAL SIGHT LINES(8 TOTAL)

- ANY RECENT VEHICLE SERVICE

YES NO

UNKNOWN

IF YES, ENCLOSE COPIES OF REPAIR ORDERS

INFORMATION:

POLICE/AGENCY REPORT #:

No report

/> ALL REPORTS/PHOTOS BY OTHERS

ADDRESS OF INSPECTION

Address **1430 e main st**

Address 2

City **Ansonia**

State **CT**

Zip **06401**

Phone **2037343318**

- EVIDENCE OF TAMPERING OR PRIOR DISASSEMBLY

YES NO

IF YES, DESCRIBE AND PHOTOGRAPH



Part B - EXTERIOR/INTERIOR VEHICLE DAMAGE

REQUIRED PHOTOGRAPHS: There was no damage to vehicle other than drivers air bag deployment. Driver claimed she was bruised and sore all over her body due to the air bag deployment.

- WINDSHIELD
- ALL AREAS OF DAMAGE MARKINGS ON INTERIOR AND EXTERIOR
- CLOSE UPS OF STAINS, SKIN, HAIR, CLOTH
- EXTERIOR AND INTERIOR DAMAGE INCLUDING UNDERCARRIAGE

INFORMATION:

- DESCRIBE ANY INJURIES TO DRIVER AND/OR OTHER OCCUPANTS
- SEE SEAT BELT/SEATS SECTION IF APPLICABLE



Part C - AIRBAG(S)

REQUIRED PHOTOGRAPHS - PHOTOGRAPH REQUIRED FOR DRB SCREENS & RECORD FAULTS
- WERE THERE DRB READINGS TAKEN?

- STEERING WHEEL
- AIRBAG(S)
- KNEE BLOCKERS ALL POSSIBLE
- LOCATIONS OF CONTACT

YES NO
IF NO, EXPLAIN

DRB was unable to retrieve codes

RECORD ACTIVE DTC'S EXACTLY AS APPEAR :	MIN	COUNT
RECORD STORED DTC'S (MINUTES/COUNTS)	MIN	COUNT

AECM INFORMATION

- SOFTWARE VERSION:
N/A

- SERIAL NUMBER :
N/A

- PART NUMBER :
N/A

- DOES AIRBAG WARNING LIGHT CYCLE ON?

YES NO N/A

- ARE WARNING LABELS PRESENT (PHOTO)

YES NO N/A

- RECORD LABEL PART NUMBER

COMPLETE PART D

- WAS AIRBAG DEPLOYED?

DRIVER YES NO

IF NO, EXPLAIN

PASSENGER YES NO

IF NO, EXPLAIN **Unknown**

SIDE YES NO

AIRBAG N/A

IF NO, EXPLAIN

- WHICH SIDE DEPLOYED?

LEFT RIGHT N/A

BOTH

- TYPE OF SIDE AIRBAG

SEAT CURTAIN N/A

- TYPE OF STEERING WHEEL

TILT STANDARD

- ANY DAMAGE TO STEERING WHEEL

YES NO

IF YES, EXPLAIN

Air bag deployed

DO NOT ERASE DRB READINGS

IS VEHICLE EQUIPPED WITH PASSENGER AIRBAG DEFAULT SWITCH?

YES NO

IF YES,

NOTE POSITION OF PASSENGER AIRBAG DEFAULT SWITCH

ON OFF N/A

- EVIDENCE OF TAMPERING OR DISASSEMBLY?

YES NO N/A

IF YES, EXPLAIN

CHECK ENTIRE UNDERBODY FOR HIDDEN DAMAGE INCLUDING FRONT AND REAR SUSPENSION COMPONENTS

- UNDERBODY DAMAGED?

YES NO

IF YES, EXPLAIN

PHOTOGRAPH REQUIRED

YES NO



Part D - SEATS/SHOULDER BELTS

REQUIRED PHOTOGRAPHS:

- OVERALL SEAT BELTS I/B & O/B

INFORMATION:

- LOCATE SEAT BELT LABELS AND RECORD ALL INFORMATION (SOME LABELS ARE SEWN TO

IF ALLOWED. FUNCTION BELTS TO INSURE THEY **FUNCTION PROPERLY**
NOTE RESULTS

- CLOSE UP OF ANY IRREGULARITIES
 - LATCHPLATE WEAR
 - CLOSE UP D-RING TO SHOW LOADING
 - OVERALL OF SEAT
 - CLOSE UP OF DAMAGE
 - RECORD DTC'S:
- WEBBING, OTHER LABELS ARE ON THE RETRACTOR FRAME: INBOARD SEAT BELT LABELS ARE NEAR THE FLOOR):
- RECORD ALL INFORMATION STAMPED ON LATCHPLATE
 - PRETENSIONER DEPLOYED?
 - YES NO UNKNOWN
 - EXISTING LOCATION OF RECLINER
 - DESCRIBE THE LOCATION AND PICTURE OF SEAT BACK WITH B PILLAR AS REFERENCE AND INCLINOMETER READING
 - up right**
 - EXISTING LOCATION OF HEAD RESTRAINT (MEASURE GAP UNDER HEAD RESTRAINT):
- DOES THE BUCKLE LATCH? YES NO
IF NO, EXPLAIN
- DO THEY RELEASE? YES NO
IF NO, EXPLAIN
- DO THEY RETRACT? YES NO
IF NO, EXPLAIN
- Left front pretensioner deployed**
- ANY LOOSENESS OR BROKEN PARTS
 - YES NO
 - IF YES, EXPLAIN
 - CHECK FOR SEAT RETAINING BOLTS
 - NORMAL
 - BROKEN
 - LOOSE
 - MISSING
 - NOTE AND RECORD APPROX. SEAT TRACK OVERLAP
2"



Part J - ADDITIONAL COMMENTS

At the dealer I raised the vehicle on a lift to check for undercarriage damage. I found no damage other than the drivers air bag deployment. I tried to get DTC readings but DRB was unable to find module.

PL
1180296

Michael A. Jefferson
Attorney at Law
84 Orange Street
New Haven, CT 06511
Ph: (203) 787-5683
Fax: (203) 777-4266
Email: maj-esq@juno.com

May 3, 2007

Chrysler Group
1000 Chrysler Drive
Auburn Hills, MI 48326-2766

RE: Bodily Injuries as Result of Motor Vehicle Air Bag Malfunction on 3/28/2007

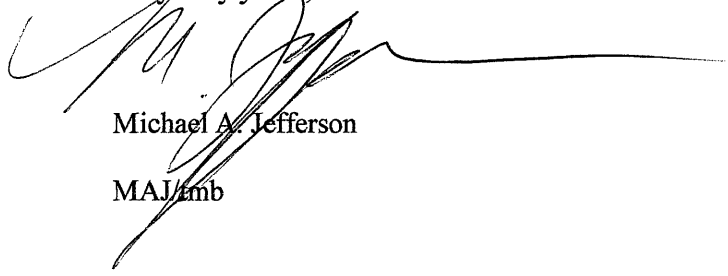
To Whom It May Concern:

Please be advised that I have been retained by [REDACTED] as a result of personal injuries sustained in the above referenced accident. I am enclosing a detail report of the incident for your perusal.

Kindly turn this letter and report over to your insurance company for further handling or provide my office with the complete name and address of your insurance company.

If you have any questions, I can be reached at the number or address listed above.

Very truly yours,



Michael A. Jefferson
MAJ/mb

DAIMLERCHRYSLER CORP.
OFFICE OF THE GENERAL COUNSEL
1st CLASS
MAY - 8 2007
BY SA
MAIL / REG. AGENT / SEC. OF STATE / PROC. SERVER

[REDACTED]
New Haven, CT

H: [REDACTED]

C: [REDACTED]

Make/ Model: 2002 Jeep Liberty – Limited edition

Color: Silver

Date of Accident: Wednesday, March 28, 2007

Time: 5:33 PM

Location: [REDACTED] New Haven, CT

Treating Physician: Kandiah Sritharan, 980 Whalley Avenue, New Haven, CT 06511
PH: 203-387-2569

Incident: On Wednesday, March 28, 2007, I was driving my 2002 Jeep Liberty north-bound on Dixwell Avenue when the airbag light went on. Less than a few seconds passed when the airbag exploded. I was able to drive my car around the corner – to my home – where I phoned my husband for help. I was stunned from the impact, which left me bruised on my stomach, and burned under my breasts.

On Thursday, March 29, my car was towed to Fitzpatrick's Jeep Liberty dealer at 430 East Main Street, Ansonia, Connecticut (203-734-3318) where a representative told me that they were not responsible for the problem as the vehicle was no longer under warranty. He said that he would contact Chrysler to see what their policy would be.

On Saturday, March 31 my left arm and shoulder began to hurt.

On Sunday, April 1, a representative from Chrysler phoned me around Noon to ask what had happened. I explained

On Monday, April 2, I made an appointment to see my doctor. He saw me on Wednesday, April 4, 2007 and said that I had separated my shoulder and scheduled me for physical therapy three times each week.

On Friday, April 6, a representative named Paul called from Chrysler to tell me that Chrysler had agreed to fix the car. He said that he could not tell me when the repairs would be made but that the parts would be ordered and that the dealership would contact me when the car was fixed.



FITZPATRICK'S

430 East Main St. Ansonia, CT 06401
Service (203) 735-3391



CUSTOMER NO. 5527	ADVISOR PAUL MILLER 18	TAG NO.	INVOICE DATE	INVOICE NO. CHCS276308
	LABOR RATE	LICENSE NO.	MILEAGE 88768	COLOR SILVER/
	YEAR / MAKE / MODEL 02 / JEEP / LIBERTY / LTD		DELIVERY DATE 11/13/01	DELIVERY MILES 19
	VEHICLE I.D. NO. 1J4GL5BK92W		SELLING DEALER NO. 100	PRODUCTION DATE
	RET. E. NO.		R. O. DATE 03/28/07	
RESIDENCE PHONE	BUSINESS PHONE	COMMENTS		

LABOR & PARTS
J# 1 52CHZ12

TECH(S): 27
SUP RESTRAINT SYS
C/S AIR BAG LIGHT CAME ON WHILE DRIVING, TURNED TO TAKE
RIGHT TURN, AIR BAG DEPLOYED
REPLACED AIR BAG MODULE-CLOCK SPRING-AIR BAG AND DRIVERS
SEAT BELT

WARRANTY

KEYS:

In Vehicle

In Office

PARTS	QTY	FP NUMBER	DESCRIPTION	UNIT PRICE	WARRANTY
JOB # 1	1	5HG331DV-AE	SEAT BELT 23049004		WARRANTY
JOB # 1	1	56010688-AA	CLKSPRING 8015001		WARRANTY
JOB # 1	1	5HK021X9-AF	AIRBAG DR 23049007		WARRANTY
JOB # 1	1	56D10501-AG	MODULE OC 8035034		WARRANTY
				JOB # 1 TOTAL PARTS	0.00
				JOB # 1 TOTAL LABOR & PARTS	0.00

TOTALS

* [] CASH [] CHECK CK NO. [] *	TOTAL LABOR....	0.00
* [] VISA [] MASTERCARD [] DISCOVER *	TOTAL PARTS....	0.00
	TOTAL SUBLET....	0.00
	TOTAL G.O.G....	0.00
	TOTAL MISC CHG....	0.00
	TOTAL MISC DISC....	0.00
	TOTAL TAX.....	0.00
	TOTAL INVOICE \$	0.00

THANK YOU !!!

PRE-INVOICE

SERVICE HOURS:
MON. - FRI.
7:00 AM - 5:00 PM

Thank You!
FITZPATRICK'S, INC.

DISCLAIMER OF WARRANTIES
The only warranties, if any, applying to the part(s) and/or service are those offered by the manufacturer. The selling dealer hereby expressly disclaims all warranties, either expressed or implied, including any implied warranties of merchantability or fitness for a particular purpose, and neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this part(s) and/or service. Buyer shall not be entitled to recover from the selling dealer any consequential damages, damages to property, damages for loss of use, loss of time, loss of profits or income, or any other incidental damages.

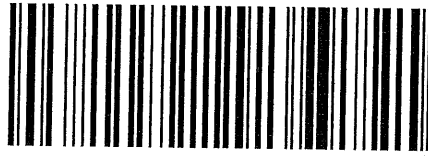
09:09am

[END OF INVOICE]

CUSTOMER COPY

Michael A. Jefferson
Attorney at Law
84 Orange Street
New Haven, CT 06511

CERTIFIED MAIL™



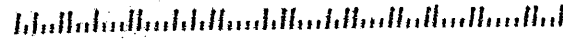
7003 3110 0001 2478 9907

**RETURN RECEIPT
REQUESTED**

Chrysler Group
1000 Chrysler Drive
Auburn Hills, MI 48326-2766

485-1342

48326+2766



U.S. POSTAGE
PAID
NEW HAVEN, CT
06515
MAY 05, 07
AMOUNT
\$0.00
00051945-03

48326

0000

UNITED STATES
POSTAL SERVICE

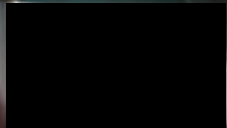
\$4.640
US POSTAGE
FIRST-CLASS
062S0005238352
06511



CS1767.07

























Jeep













Jeep

OFF ROAD







1 K000A5







CARQUEST

60



W

CARQUEST

⚠ DANGER/POISON

EXPLOSIVE GASES CAN CAUSE BLINDNESS OR INJURY.
SHIELD EYES.
NO SPARKS, FLAMES, SMOKE, OR SMOKING.
SULFURIC ACID CAN CAUSE BLINDNESS OR SEVERE BURNS.
GET MEDICAL HELP FAST.
WASH EYES IMMEDIATELY WITH WATER.

PART NO.
26-60

CA @ 32 F

665

CCA @ 0 F

540



1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00

KEEP OUT OF REACH OF CHILDREN.
DO NOT TIP. DO NOT OPEN BATTERY.

REMOVE PROPER MONTH AND YEAR TABS TO SHOW DATE SOLD.

AUTO USE

COMM USE

CARQUEST

60











This Diagnostic Control
Module is not supported by
this software. Please use the
DRB III with the Supercard
software to diagnose this
vehicle.

F1
HELP

F2
SYS

F3
MAIN

64.0

TRU

NO

401011R

MEETS FMVSS 209
ASSEMBLED IN MEXICO



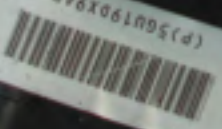






P5HGC
A1D
TR227015

(P)56U190X9A8



A white rectangular label with a barcode and the alphanumeric string (P)56U190X9A8 printed above it. The label is affixed to the black plastic component.

WARNING

SERIOUS INJURY OR DEATH CAN OCCUR

IF YOU ARE NOT PROPERLY SEATED BY THE AIR BAG. NEVER USE SEAT BELTS OR CHILDREN, OR CHILDREN IN THE FRONT. ALWAYS USE SEAT BELTS AND AIR BAG. ALWAYS WEAR SEAT BELTS AND SEATBELT RESTRAINTS.

WARNING: HIGHER ROLLOVER RISK



AVOID ABRUPT MANEUVERS AND EXCESSIVE SPEED.

ALWAYS BUCKLE UP

SEE OWNER'S MANUAL FOR FURTHER INFORMATION.



WARNING

**DEATH OR SERIOUS
INJURY CAN OCCUR**



- CHILDREN 12 AND UNDER CAN BE KILLED BY THE AIR BAG.
- 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.



EA12-001
CHRYSLER
ENCLOSURE 4
LEGAL
KJ
Prior to 10.4.11

Customer Assistance Inquiry Record (CAIR)#

18911953

Vin	1J4GL48K7 3W [REDACTED]	Open Date	09/08/2009	Built Date	10/04/2002
Model Year	2003	Body	KJH74	JEEP LIBERTY SPORT 4X4 SPORT UTILITY 4-DR	
In Service Dt	11/07/2002	Mileage	93,000	Dealer Zone	51 CHICAGO
Plant	W	TOLEDO NORTH ASSEMBLY PLANT	Market	U	US
Color	PS2	BRIGHT SILVER METALLIC CLEAR COAT			
Engine	EKG	ENGINE - 3.7L POWER TECH V6			
Transmission	DG4	TRANSMISSION-MULTI-SPEED AUTO, 45RFE			
Dealer	68264	FEENY CHRYSLER JEEP INC			
Dealer Address	1010 EAST CHICAGO STREET				
Dealer City	ELGIN	Dealer State	IL	Dealer Zip	60120
Owner	[REDACTED]	Contact Type	TELEPHONE		
Address	[REDACTED]	Home Phone	[REDACTED]		
	SOUTH ELGIN IL [REDACTED]	Country	UNITED STATES		

Product - Unknown - Unknown - Accident - Default	Injury, no accident
Corporate - Complaint Contact - Default - Default - Default	
Corporate - Property Damage - Default - Default - Default	
Product - Body / Trim / Paint Finish - Air Bag - Unjustified Deployment - Both	

1. Who is calling and what is their contact information? Owner
 Preferred [REDACTED]
 Alternate: [REDACTED]

2. What happened? Both airbags deployed, sustained bruises on the arms

3. What is the current location of the vehicle? Viney Chrysler, 1010 East Chicago St, Elgin, IL 60120
 left message with person who answered home phone.

Per OGC Matrix, reassigned to 82T. JSS15.
 9/9/09 ASSIGN TO LSE6.
 CAIR NUMBER 18911953 REQUEST EAA INSPECTION 09-10-2009 10:58
 CAIR NUMBER 18911953 E-MAIL SENT TO EAA 09-10-2009 10:58
 CCRG Open Date: 09/09/2009 10:58:45
 Letter Sent: Acknowledgement 09/10/2009 11:00:34
 PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 09/12/09 AT 17:05:34 18911953

September 16, 2009

Attention: Rajya
Reference # 1205214

Hello Rajya,

Per our phone conversation on 9/15/09, I have made a proposal to Chrysler in order to close this concern without going through the legal process. My proposal to Chrysler is: **1.** Cover the costs to repair the vehicle and **2.** An additional \$5000 to compensate my family for the anxiety as well as pain suffered through this incident. You had mentioned to me that the air bag malfunctioned, but could not give me a reason why it malfunctioned. This makes me even more nervous to drive the vehicle. For the pain and suffering that I endured, the heavy bruises left on my right forearm limited me the use of my right forearm for about 10 days until the swelling reduced and the bruises went away. I was told by the doctor to continually ice my right forearm. I was fortunate that my right forearm was not broken. I can provide the doctors note and pictures of the bruise/swelling on my forearm if requested. Also, for the last 2 weeks, my wife was also without a vehicle and had to find other means of transportation to and from work.

Prior to this incident, I had planned on keeping my Jeep for another 5 years before trading it in maybe for another Chrysler vehicle. I am happy with Chrysler and the performance my Jeep Liberty gave me to the point of premature airbag deployment. I plan to trade the vehicle after repair. If the air bags deployed again prematurely in the future, the vehicle may be in motion, which could result in more severe consequences. Additionally, I am sure you are aware that this incident now has a permanent "mark" on this vehicle. The value of my car has significantly dropped because of this condition. Potential buyers will see that the air bags deployed and their first assumption will be that this vehicle was involved in an accident, which it was not and never has been involved in an accident.

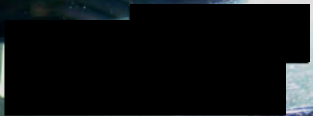
In my opinion, given the situation and how this occurred, I am not asking much from Chrysler. I have no faith that when the Jeep is repaired, that a pre-mature deployment will not happen again because Chrysler cannot provide a root cause of the problem, per our conversation.

I would hope the Chrysler committee review the circumstances involved because of this incident and hopefully come to a resolution. I would like to settle this concern with Chrysler without going through litigation.

Sincerely



1J4GL48K73W



MFD BY DAIMLERCHRYSLER CORPORATION

DATE OF MFR 10-02

GWR 2541 KG (5600 LB)

GAWR FRONT

1240 KG (2750 LB)

WITH TIRES P215/75R16

RIMS AT 16X7

COLD 227 KPA (33 PSI)

GAWR REAR

1420 KG (3150 LB)

WITH TIRES R215/75R16

RIMS AT 16X7

COLD 227 KPA (33 PSI)

THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY AND THEFT PREVENTION STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.

VIN: 1J4GL48K7

TYPE:

MPV

SINGLE X DUAL



MDI: 100408 776AB

PNT:PS2

VEHICLE MADE IN U.S.A. TRN:PSDV 4640503







⚠ WARNING



DEATH OR SERIOUS INJURY CAN OCCUR

- CHILDREN 12 AND UNDER CAN BE KILLED BY THE AIR BAG.
- 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.**

⚠ WARNING



AVOID ABR
AND EXC

ALWAYS B

SEE OWNER'S
FOR FURTHER IN































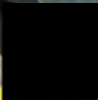
887

LIBERTY



Jeep
4x4

Jeep































CORPORATION

This Diagnostic Control
Module is not supported by
this software. Please use the
DRB III with the Supercard
software to diagnose this
vehicle.

F1
HELP

F2
SYS

F0
MAIN

64.1



F1 F2 F3 F4



☀ DIVOM YES PAGE FWD

HEAD LOCK NO PAGE BACK

ASC DEF 2 DEF 3 DEF 4

JEL 4 MISC 5 FOR 6 YES 7

REV 7 VMA 8 YES 9 SHFT * * * 0 MORE

CHRYSLER
DRB III™
SuperCard
2
CHRYSLER
SPE OBD
↑ This side up ↑

NO RESPONSE from ORC
Please make certain of the
following items:

- 1) Ignition is turned on.
- 2) DRB III is properly
connected to the Data
connector.

HELP

SYS

64.1
MAIN

F1

F2

F3

F4

DTC TYPE

1. Active
2. Stored

Page 1 of 1

F1
HELP



F0
MAIN

OCM

54.1

DRB III
CONSULTATION

NO RESPONSE from OCM
Please make certain of the
following items:

- 1) Ignition is turned on.
- 2) DRB III is properly
connected to the Data
connector.

VIN Verification

Original VIN

Current VIN

PRESS ENTER TO CONTINUE



ABS

BATT

OIL









4671168E
72472M

6/19
105 60