

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

EA12-001

CHRYSLER

ENCLOSURE 4

LEGAL

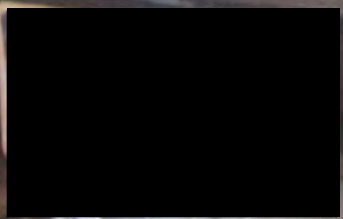
KJ

After 10.4.11

1J4GK58K33W



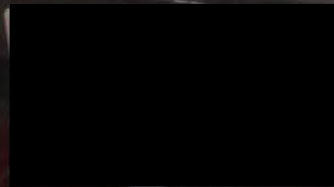
Jeep





1491

Jeep





FIRE

1491

12-12
9



LIBERTY LIMITED

12-12

9 12



LIBERTY LIMITED





Jeep

3.7L

Jeep

RIM CLAMP
BOWLEY



3.7L

DISCOVERER

EVERY CONTACT WITH
THE CONSUMER IS CRITICAL. NOT ONLY
WE FIX IT RIGHT THE FIRST TIME.
WE GET IT RIGHT EACH TIME.

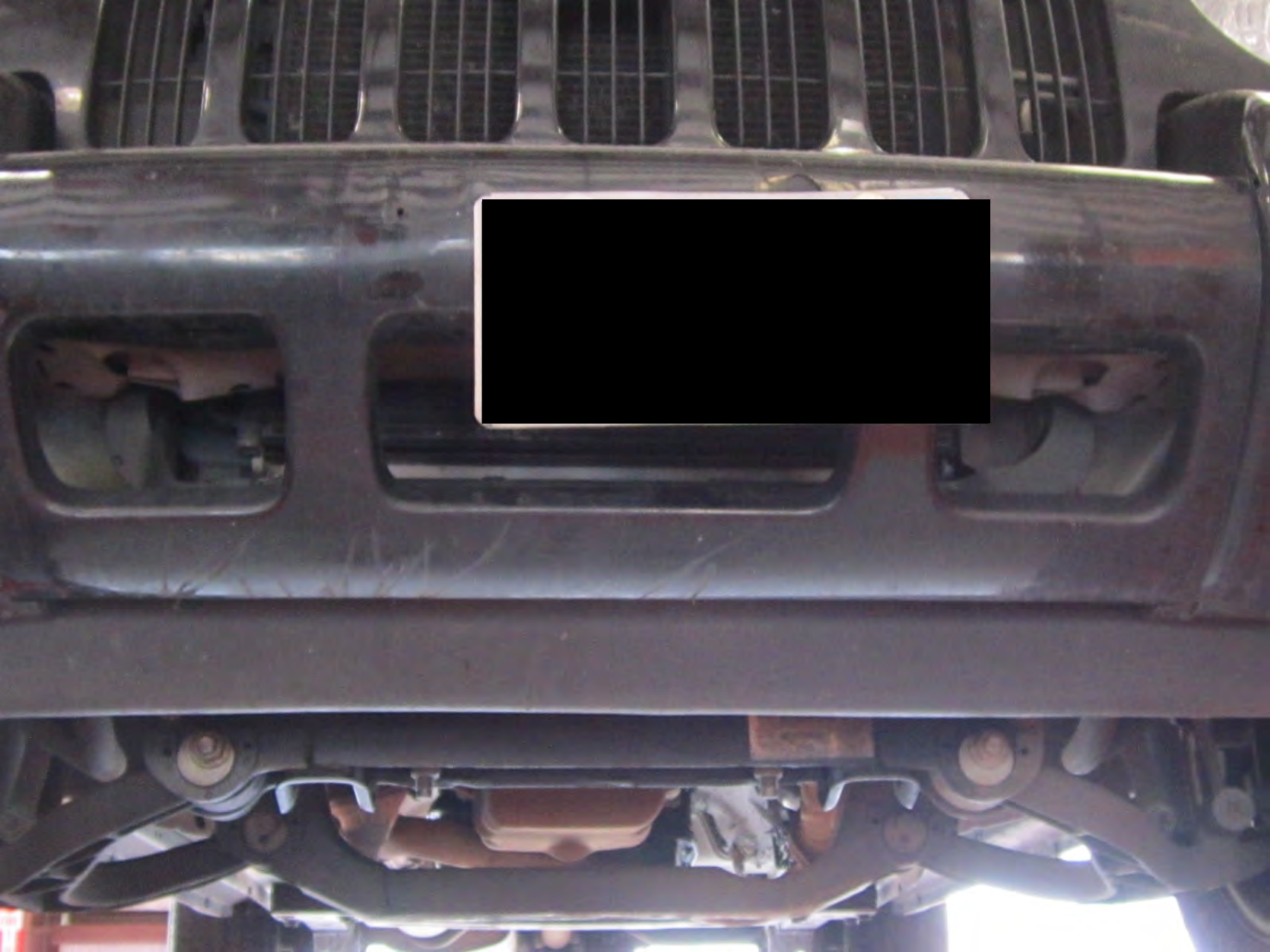


LIBERTY



1499

LIBERTY LIMITED











Lot No. 11761
S/N 3754770 3 1/2 412 LHD CRANES

Part No. 

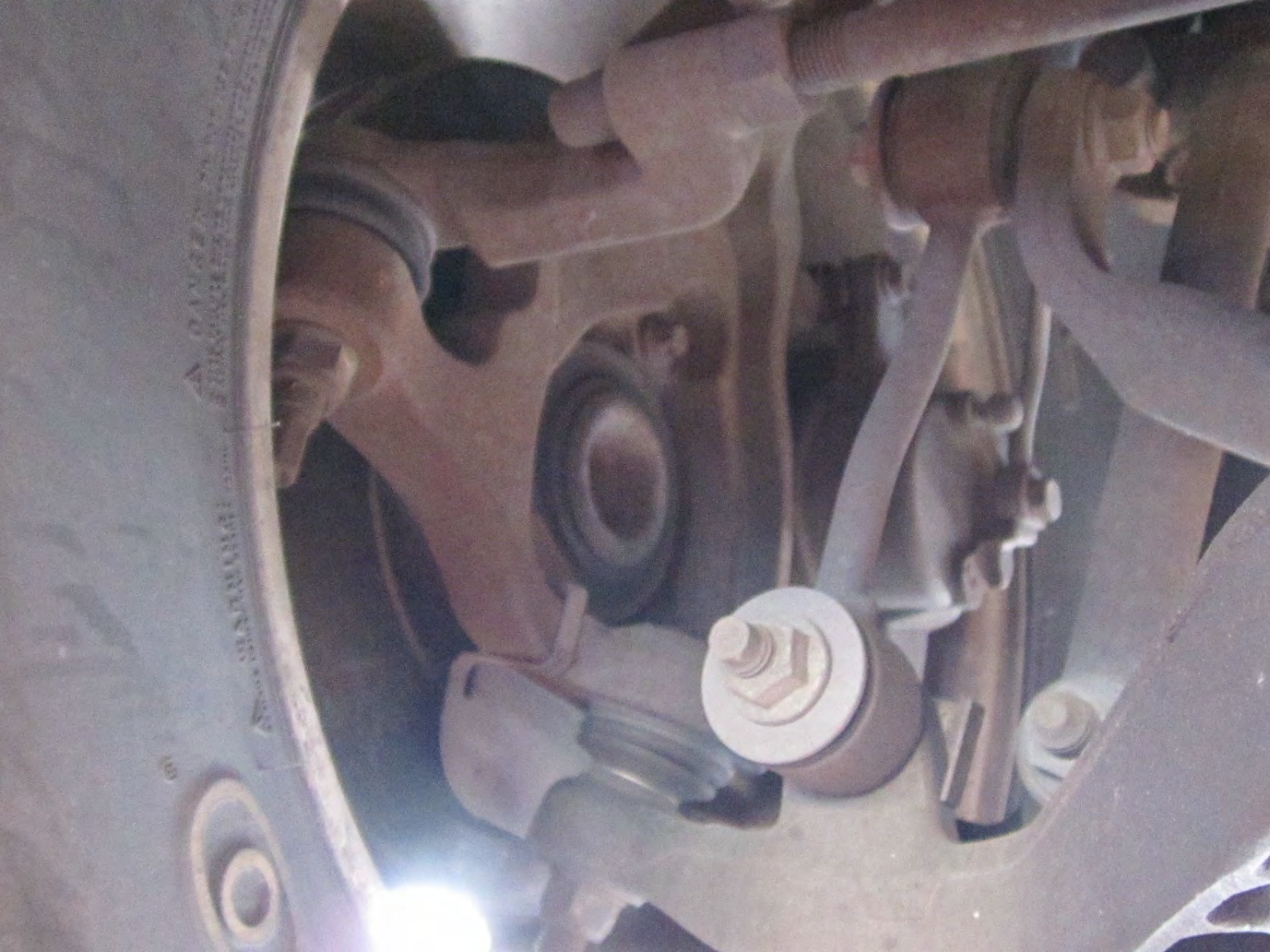
Part No. 



















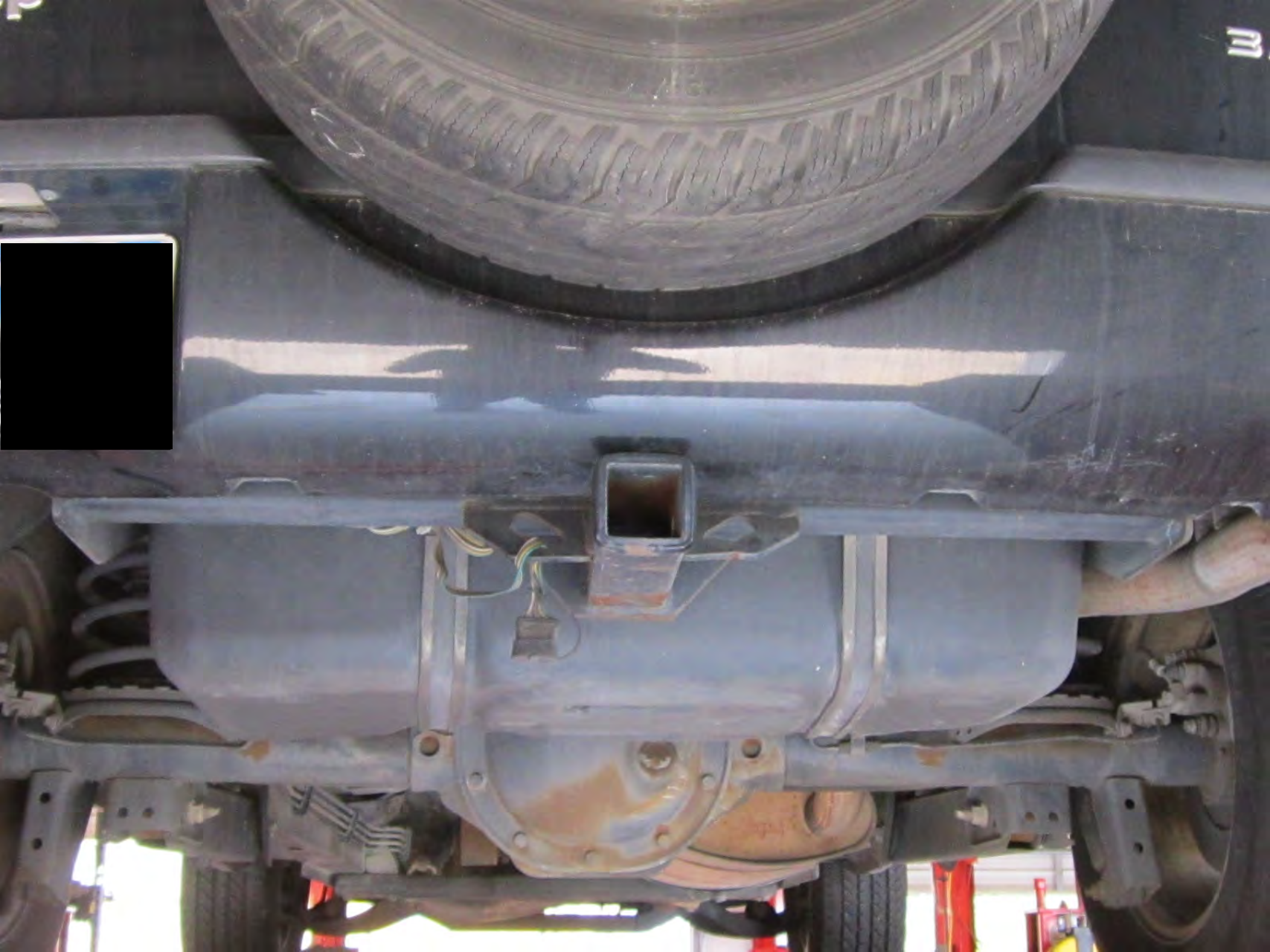










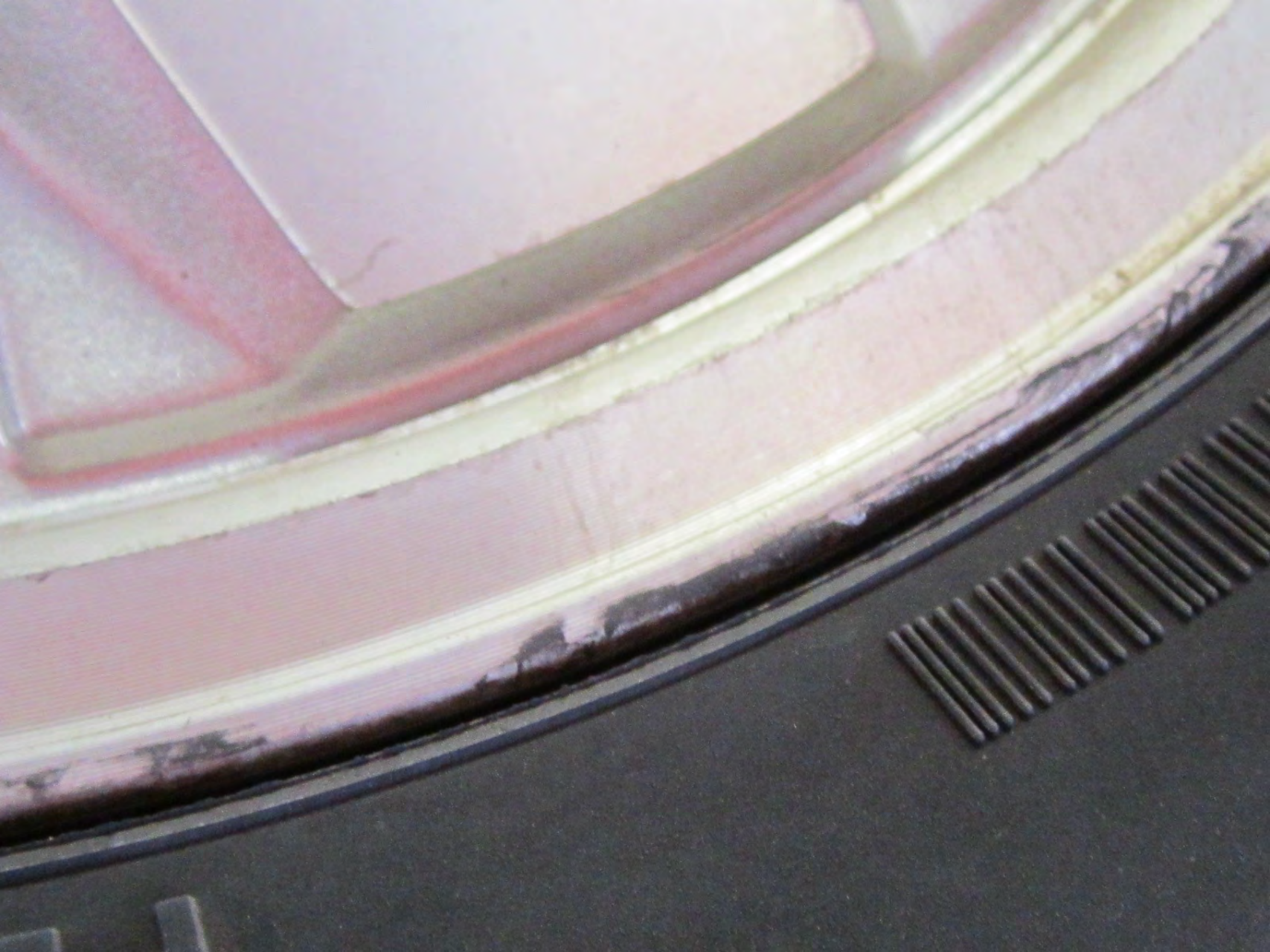




LF

LF

Jeep



N O 8 B 4 U U



Dodge

P235/70R16

16

DODGE



LF







RF

RF



MC

DOT

TREAD PILES: 2 POLYESTER + 2 STEEL + 1 NYLON
SIDEWALL PILES: 2 POLYESTER

210 72 65 50 W.L. 2355

mc

50 PLYES: 2 POLYESTER + 2 STEEL
SIDEWALL PLYES: 2 POLYESTER



001

FILM + 1 NYLON



WARN
TRAFFIC LIGHTS

3613-588-38

ALL BEARSON

RADIAL
UNIROYAL
MADE IN U.S.A.

MAX. LOAD 900 kg (1984 LBS.)





REF








MADE IN THAILAND
155/70R13
1000000

LR

Jeep

A close-up photograph of a car's alloy wheel. A piece of white, textured paper is taped to the center of the wheel with a strip of blue tape. The letters 'LR' are written in black marker on the paper. The wheel has a multi-spoke design and a central hubcap with the word 'Jeep' embossed on it. The background is a light-colored surface, possibly a car's body panel.

LR



WATER MARK
& SERIAL NO.

THIS WATER MARK
WAS TAKEN ON A 16.5" RIM.
SIX

4





FR









GOOPER

DISCOVERER
AST

RR



RRR

GOOPER

DISCOVERER





RRR





02153120





A photograph of a car's rear suspension system, showing a coil spring and a shock absorber. A piece of white, crumpled paper is taped to the center of the spring with a blue piece of tape. The paper has the word "RRR" written on it in large, bold, black letters. The background is dark and shows other parts of the car's chassis.

RRR







LIBERTY





ep

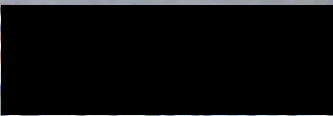
3.7L

Jeep

TR

Jeep

3.7L







2607

SAFETY
1801

THIS TIRE IS NOT TO BE USED ON A MOTOR VEHICLE
UNLESS IT IS APPROVED BY THE MANUFACTURER
FOR SUCH USE. SEE THE OWNER'S MANUAL FOR
MORE INFORMATION.

TRUCK

















NEW TAG





Jeep





!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



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**.





540
P
4755

RPM x 1000

10



PRESS

PRESS















143

CLAIM
PLEASE PRESENT THIS TAG
WHEN CALLING FOR YOUR CAR
THANK YOU

1431



1431

REARVIEW MIRROR
ADJUST THE MIRROR
FOR YOUR COMFORT
AND SAFETY











Jeep





STUDENT
80500
EXPIRES AUGUST 31, 2011



OVERVIEW AIR





































ATTENTION

- 1. Do not use a power drill to remove the battery terminals.
- 2. Do not use a power drill to remove the battery terminals.
- 3. Do not use a power drill to remove the battery terminals.

WARNING

- 1. Do not use a power drill to remove the battery terminals.
- 2. Do not use a power drill to remove the battery terminals.
- 3. Do not use a power drill to remove the battery terminals.

part 87764

REPLACE THE CATALYST ASSEMBLY WITH THE FOLLOWING PARTS:

DESCRIPTION	QUANTITY
UPPER CATALYST	1
LOWER CATALYST	1
CATALYST	1



BELT ROUTING

model 960



Dual-Cart

DANGER / POISON

SHIELD EYES
EXPLOSIVE GASES
CAN CAUSE BURNING OR BLINDNESS

SULFURIC ACID
EXTREMELY CORROSIVE
CAUSES SEVERE BURNS

NO
- Smoking
- Flaming
- Eating or Drinking

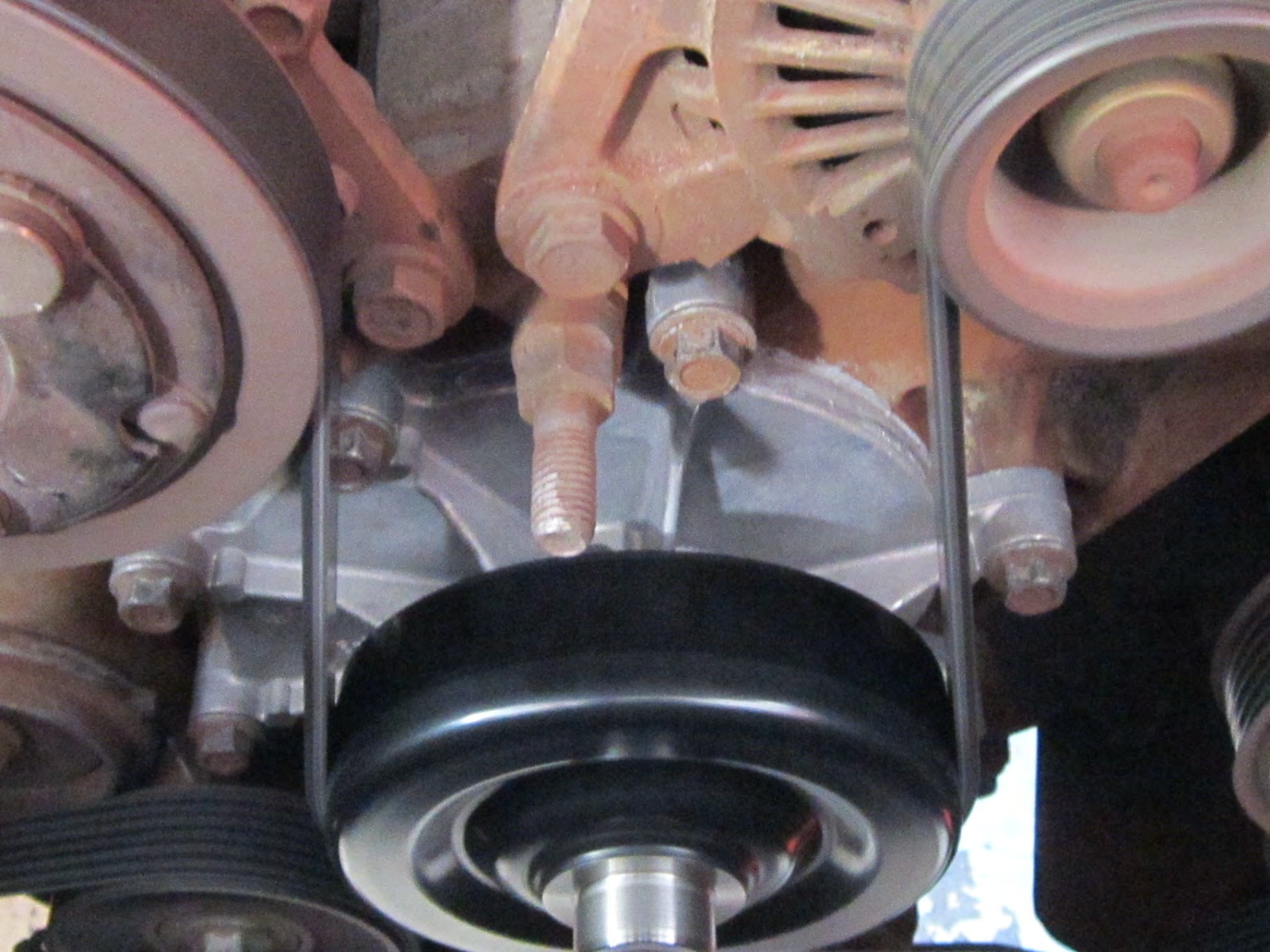
DO NOT DRINK
WASH EYES IMMEDIATELY
IF SWALLOWED
SEEK MEDICAL ATTENTION
IF NOT ALREADY RECEIVED SERVICE



FUEL
CAUTION
15000

D









169D
1712E

58041891 RD
REV. 4
04M69D
1717E

Serial Number
TRZME1892A2122



Water/Washer Part Number
P56010319AB



397540



Part Number
TRZME 1892A2122
Production Year Part Number
P56010319AB
LAWRENCEVILLE, GA
Genuine GM



30764C
30764C
30764C
30764C
30764C



**AIR
BAG**



RPM x1000



BRAKE

7





TRANS
TEMP



MPH km/h

TYPE 35

161050

Before operating, carefully read the
DRBIII Software License Agreement
provided with the originally purchased
DRBIII or with any other periodically
provided updates to the software.
The DRBIII Software License Agreement
can also be viewed at the internet:

<http://www.miller.spx.com>

or contact Miller Special Tool
in the USA: 1-800-801-5420

Press YES

If you agree to be bound by the terms
of that License Agreement

IBM III CORB Application
Chrysler Corp.

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RELEASE 64.1 01

Released: 15:51:24 10/11/2007

Bios Version: 4.02

Database: 8:18:38 7/19/2007

Cable in use: J1962 (CH7000A)

DRB TEL CDRB Application

Chrysler Corp.

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RELEASE 01.01

Released: 15:51:24 10/11/2007

Bios Version: 4.02

Database: 8:18:38 7/19/2007

Cable in use: J1962 (CH70000)

1. Engine
2. Transmission & T-Case
3. Body Interior
4. Chassis & Body Exterior
5. Anti-lock Brakes
- 6. Passive Restraints**
7. Theft Alarm
8. System Monitors

F1
HELP

F2
SYS

F3
MAIN

SELECT RESTRAINT SYS

1. Airbag
2. Side Airbags
3. Airbag On/Off Switch S
4. Occupant Classificatio

SAATCHI & SAATCHI

DRB

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

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

DRB III CDRB Application

Chrysler Corp.

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All Rights Reserved

RELEASE 64.1 01

Released: 15:51:24 10/11/2007

Bios Version: 4.02

Database: 8:18:38 7/19/2007

Cable in use: J1962 (CH7000A)

04

STAND-ALONE MAIN MENU

1. 1998 - 2007 Diagnostics
2. 1983 - 1997 Diagnostics
3. Vehicle Module Scan
4. Customer Preference
5. Junction Port Tool
6. TechTOOLS DataRecorder

SELECT SYSTEM

1. Engine
2. Transmission & T-Case
3. Body Interior
4. Chassis & Body Exterior
5. Anti-lock Brakes
6. **Passive Restraints**
7. Theft Alarm
8. System Monitors

CHRYSLER
CORPORATION

DRBIII™

SELECT RESTRAINT SYSTEM

Airbag

Side Airbags

Airbag On/Off Switch System

Occupant Classification Sys

--- AIRBAG DIAGNOSTICS ---

Determining Controller
Type

Please Wait...

CHRYSLER
CORPORATION

DRB III™

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

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

CHRYSLER
CORPORATION

DRB III⁴²

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







APPLY BRAKE

P

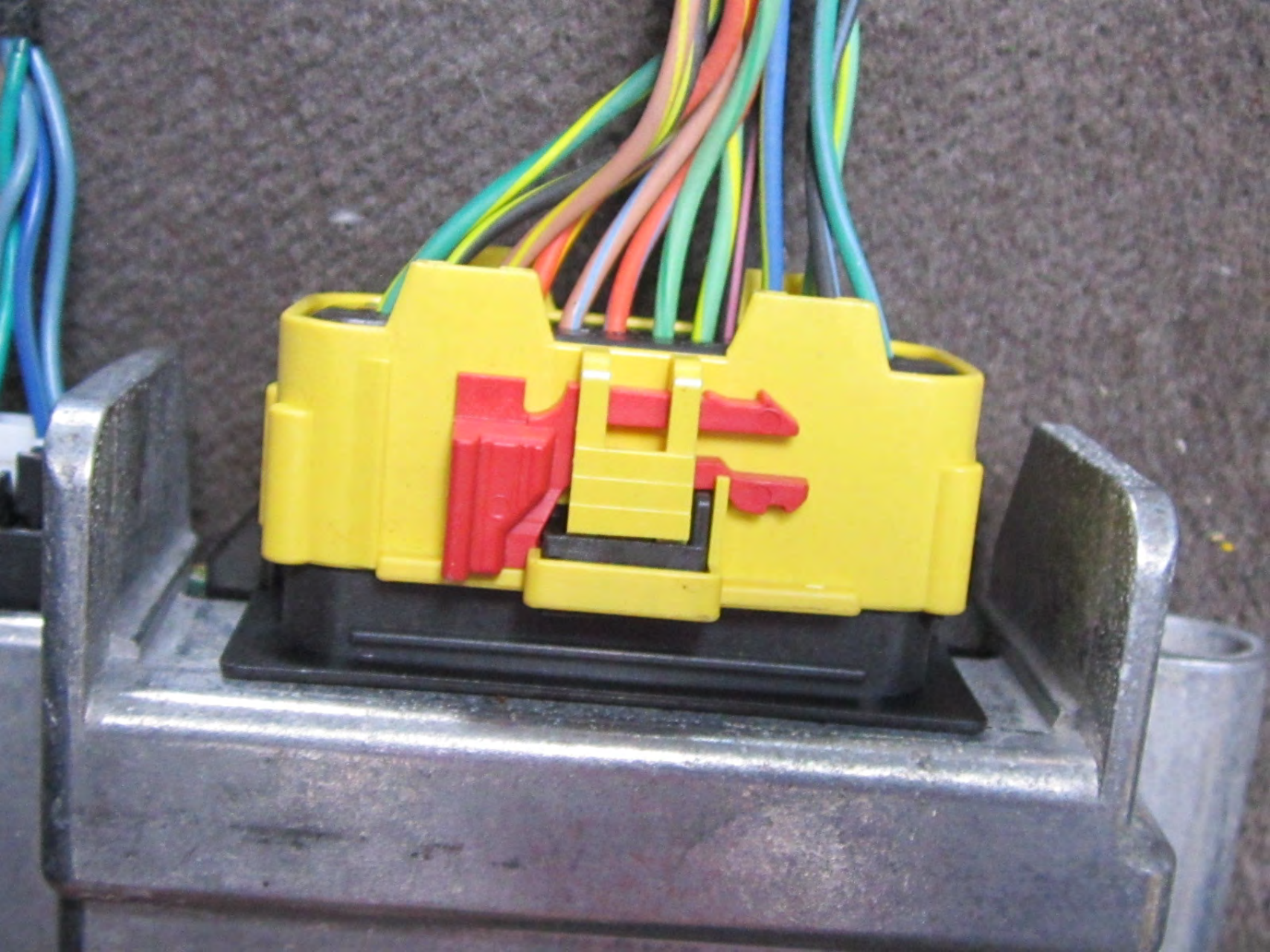
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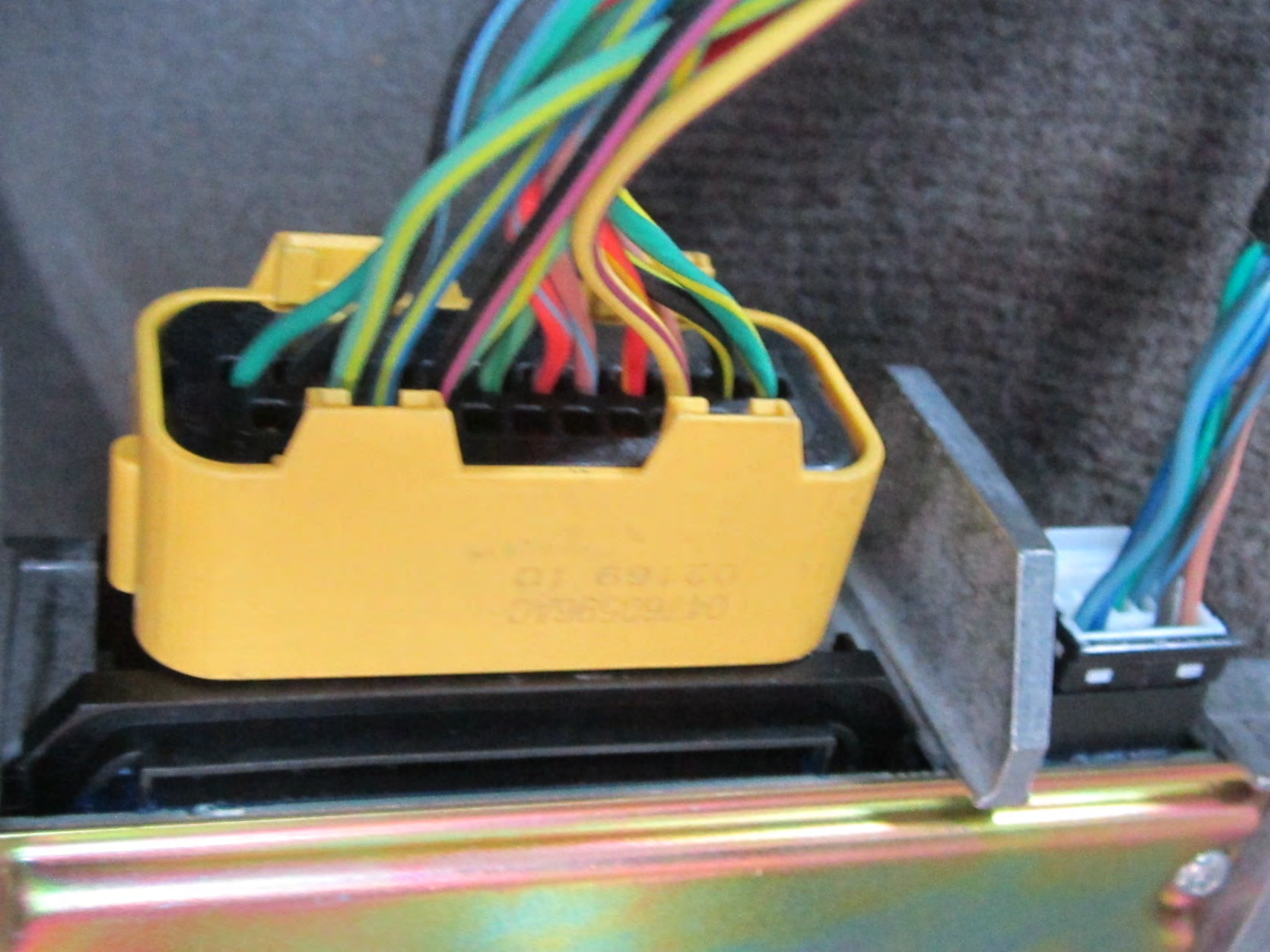
N

D

2

1





CHRYSLER P/N P56010501AH



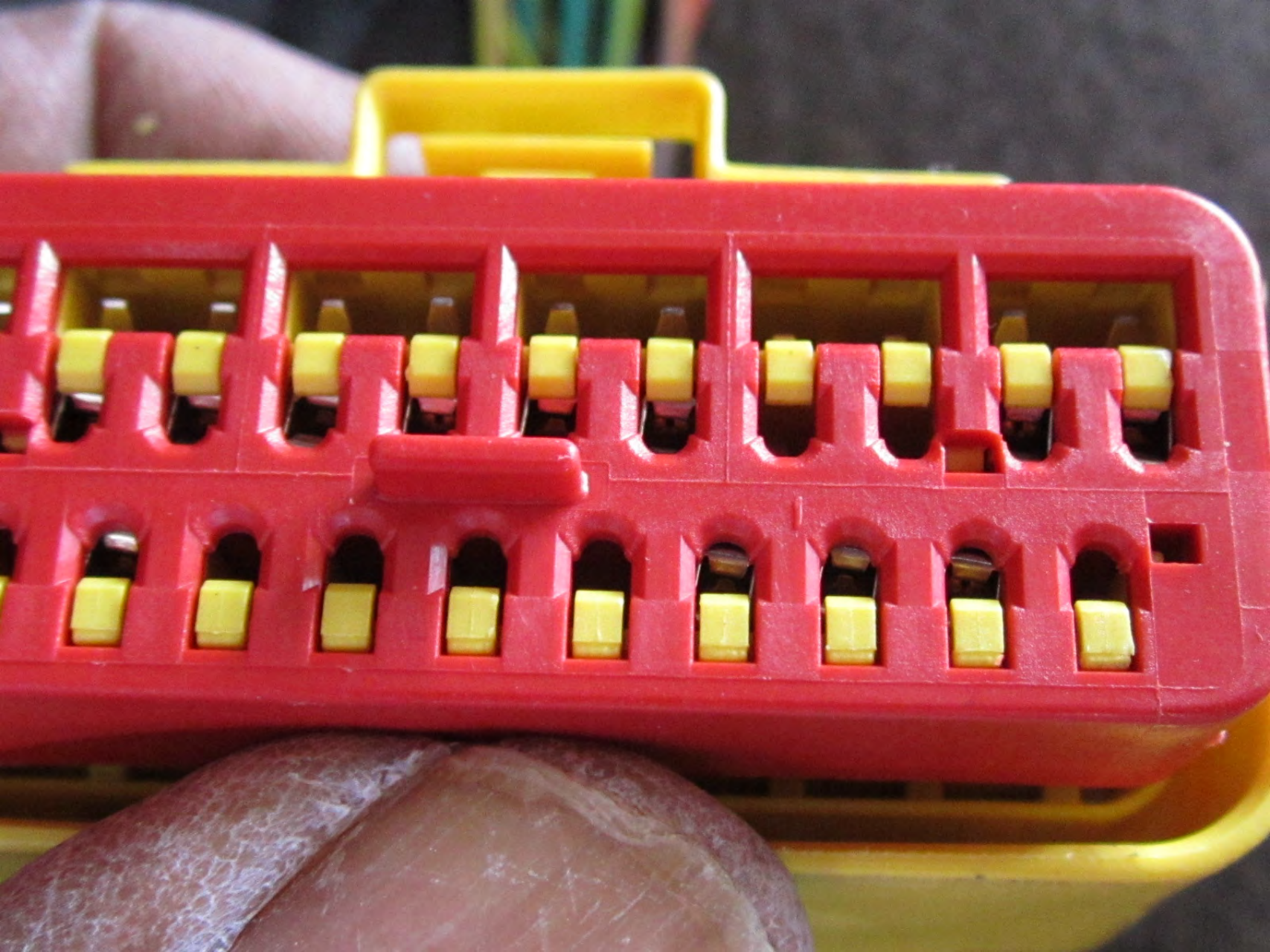
WARNING. REFER TO SERVICE MANUAL BEFORE SERVICING.
IMPROPER SERVICING CAN RESULT IN AIR BAG SYSTEM
FAILURE AND POSSIBLE DRIVER AND/OR PASSENGER INJURY.

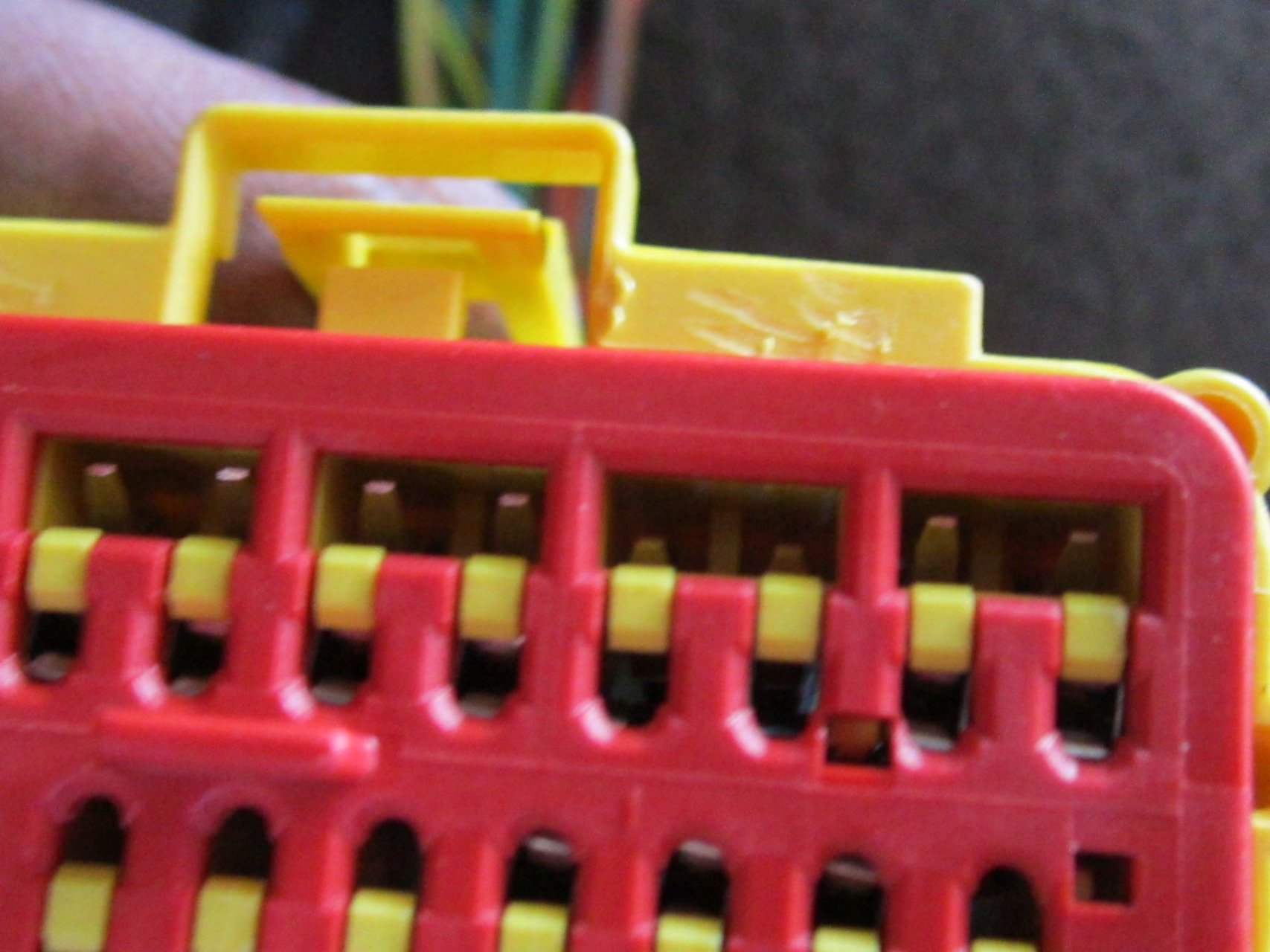
CHRYSLER S/N TSFME1842E2111

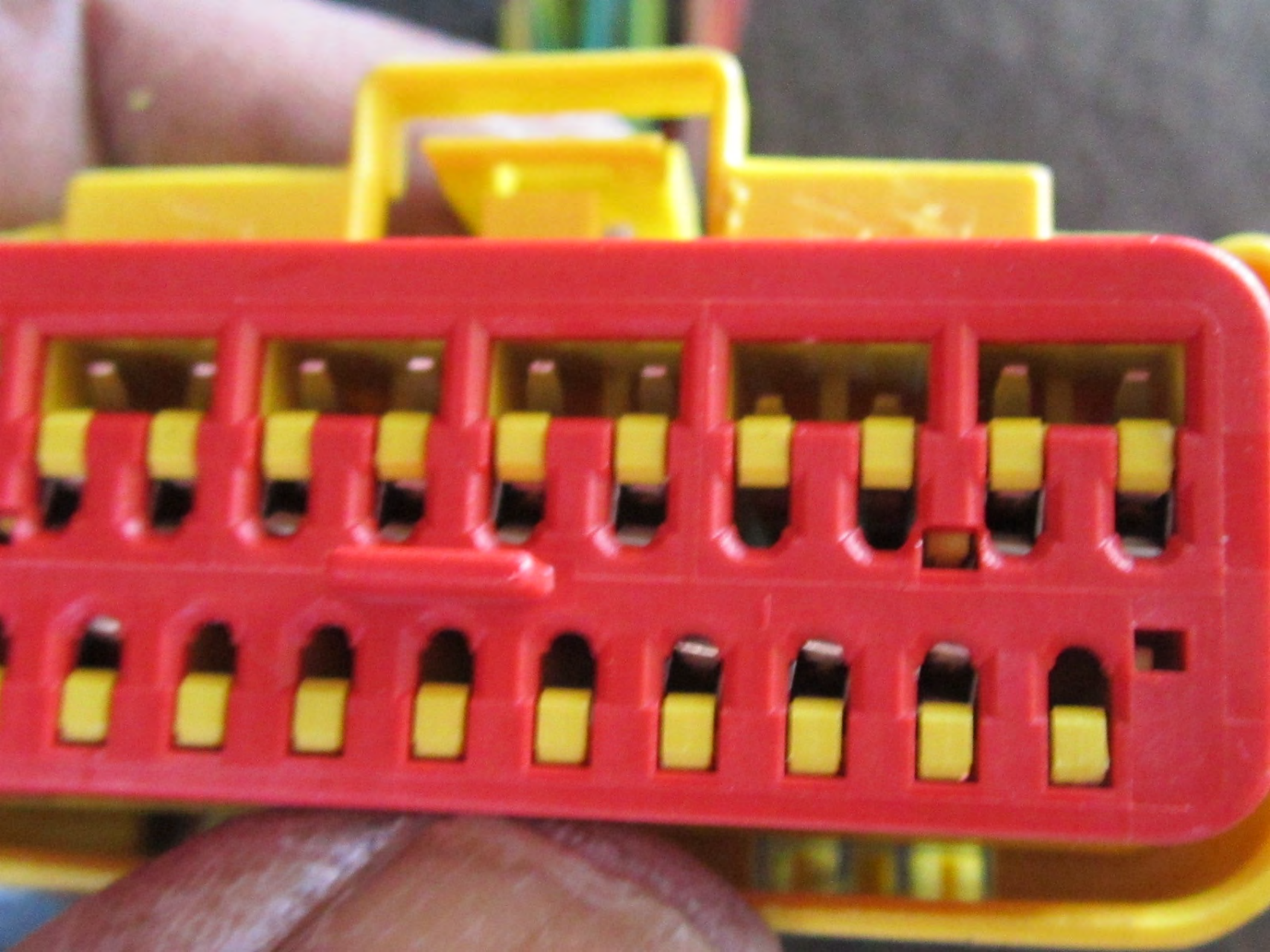
SUPPLIER CODE

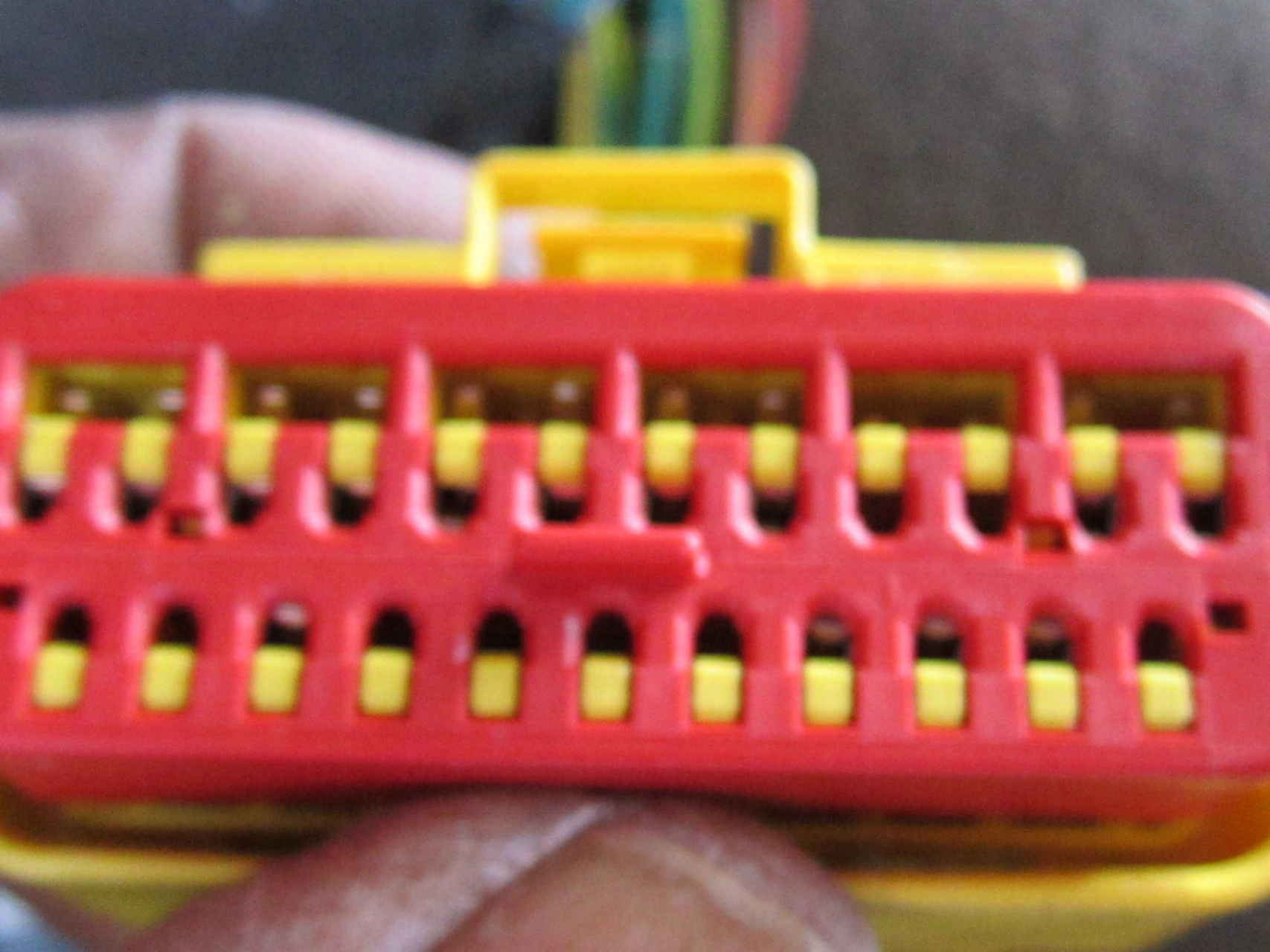


39754

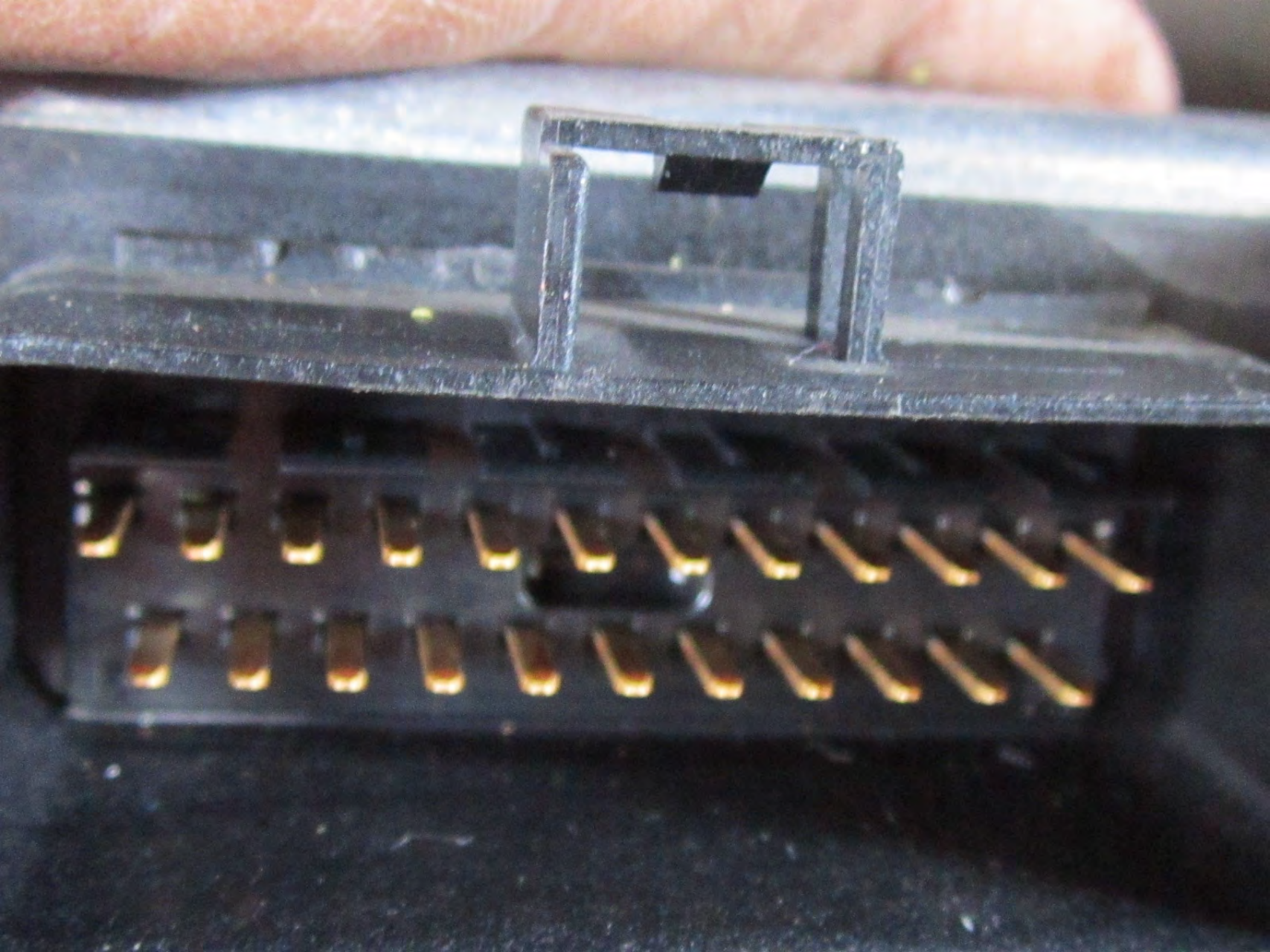


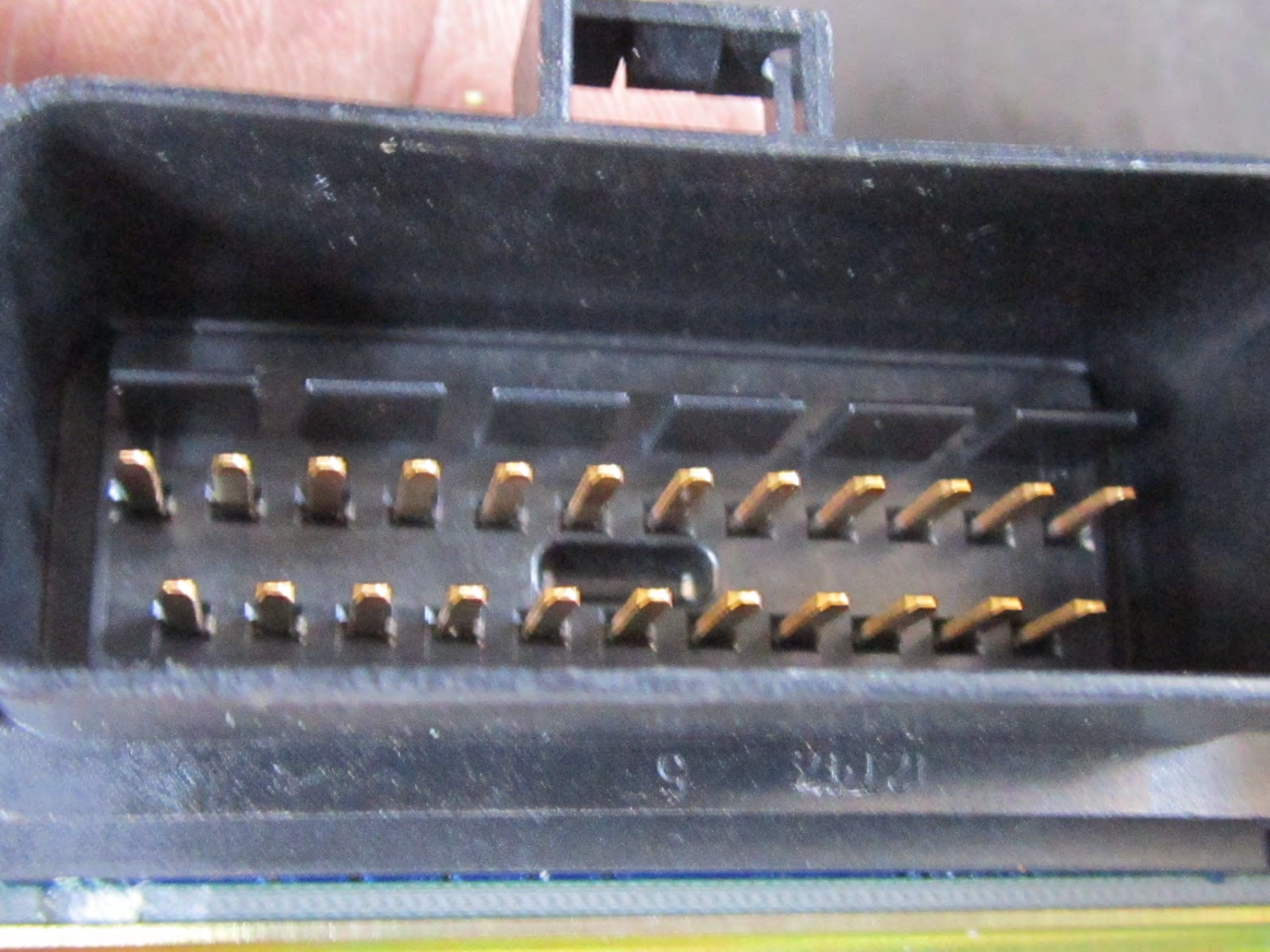




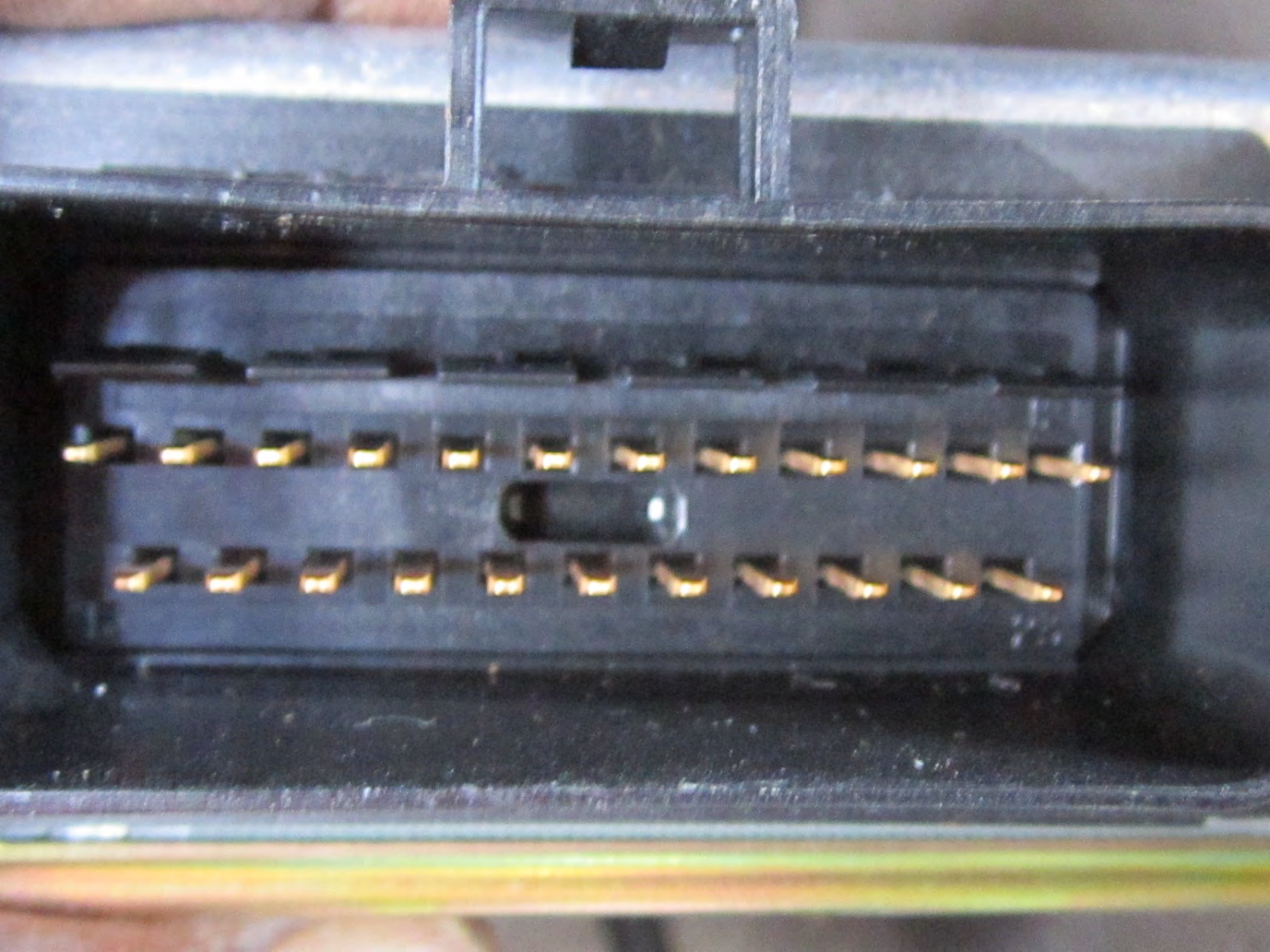


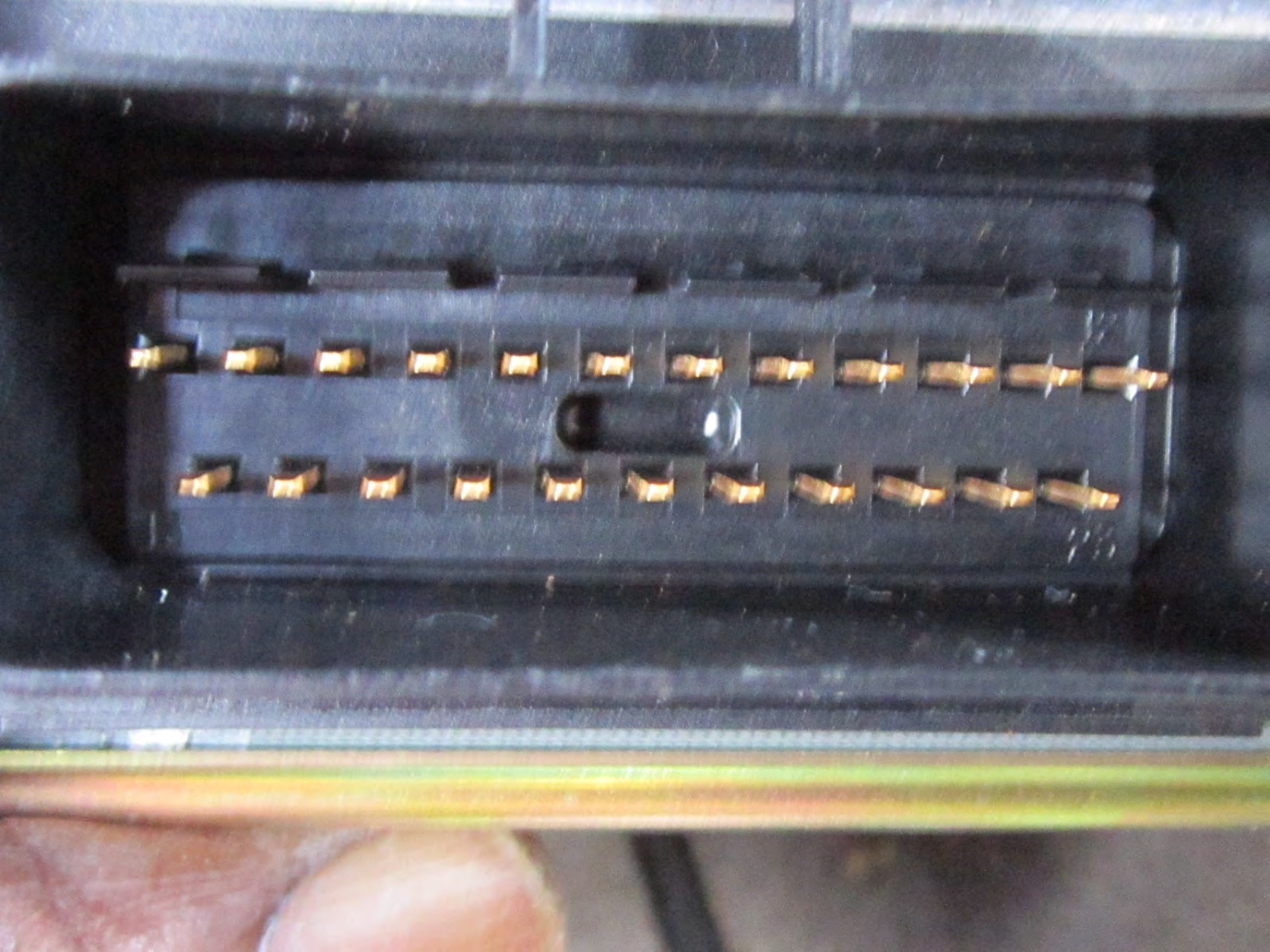


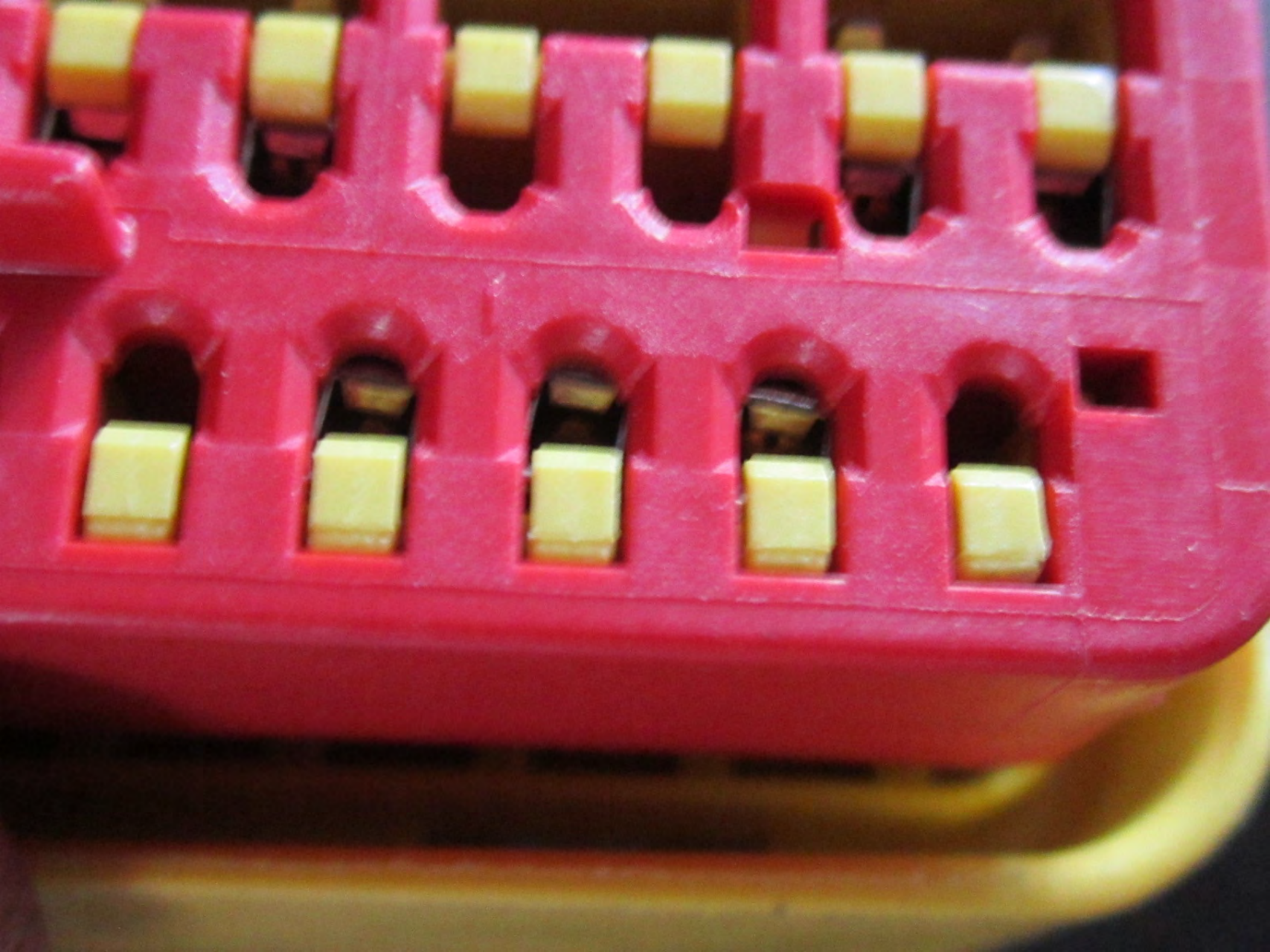


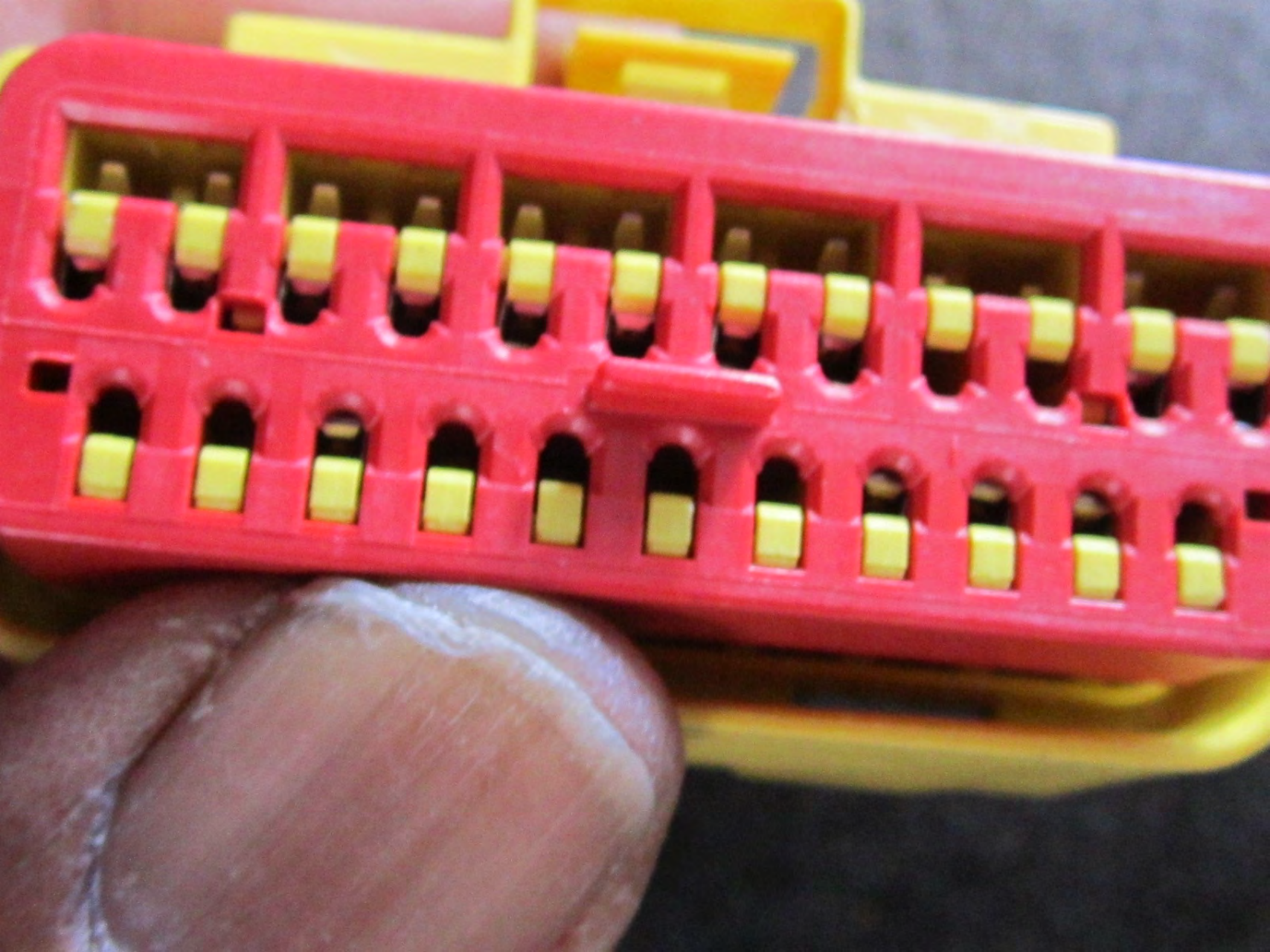


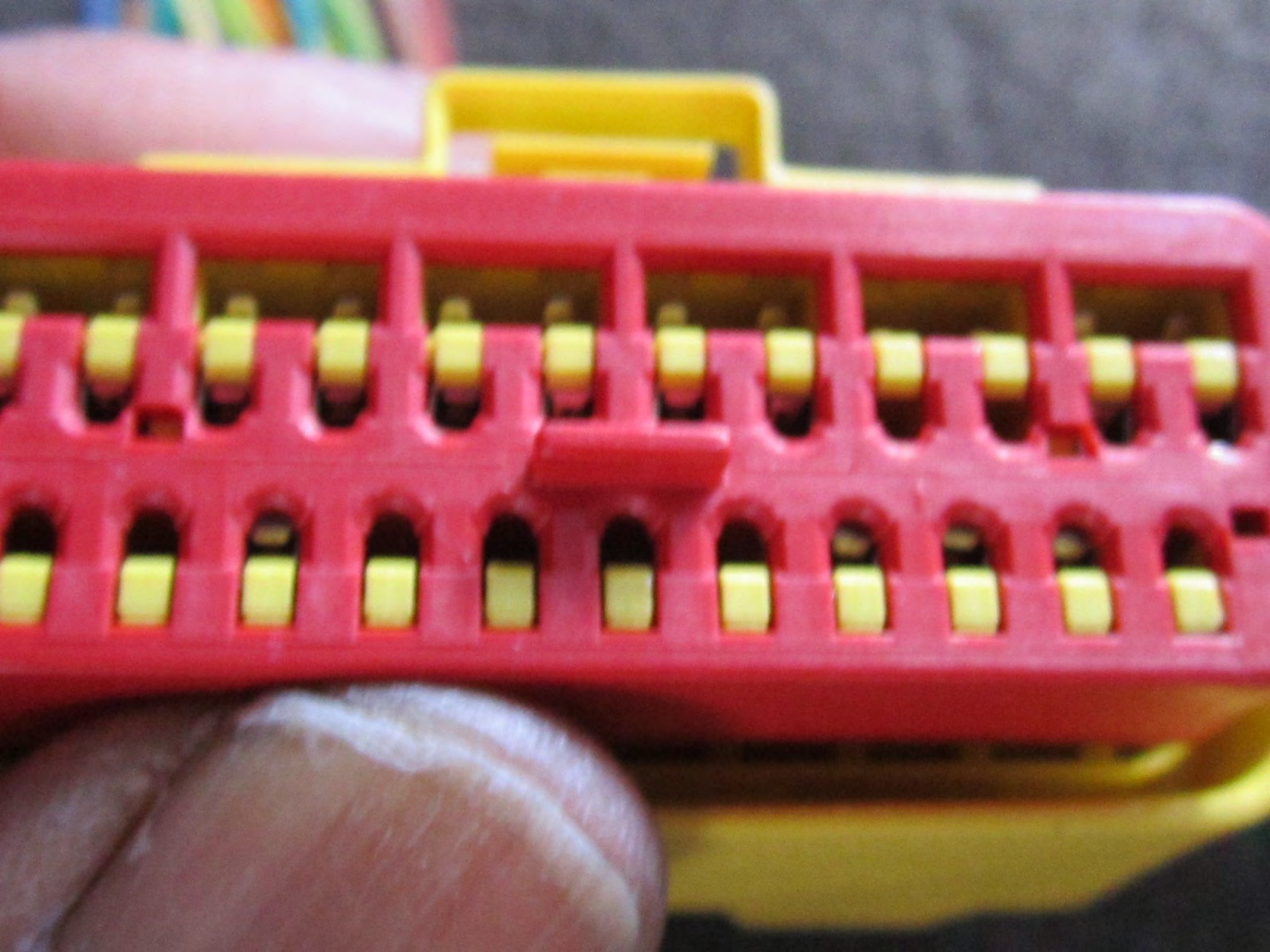
9 2112

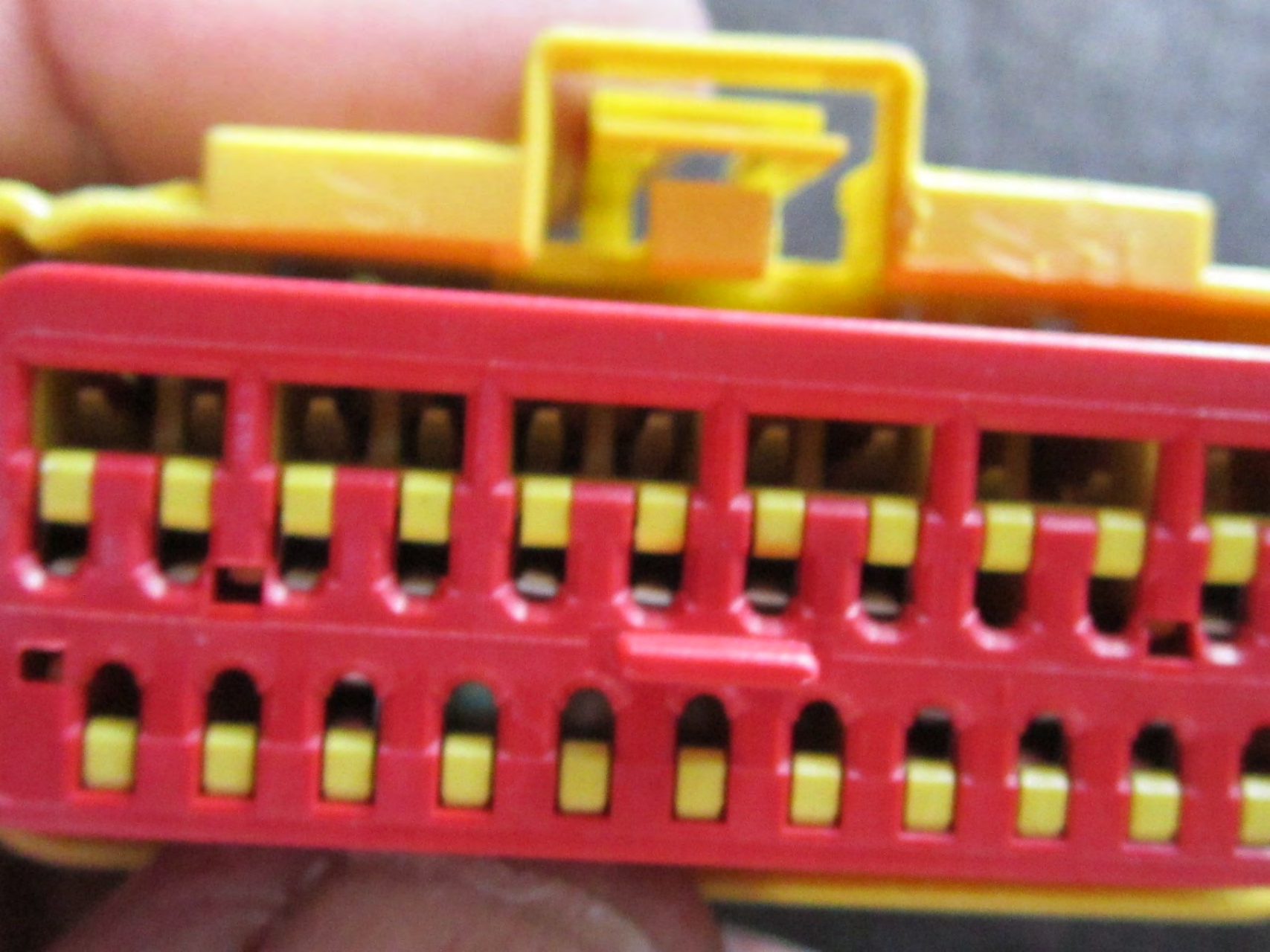














Customer Assistance Inquiry Record (CAIR)#**22102838**

Vin	1J4GK58K3 3W [REDACTED]	Open Date	04/10/2012	Built Date	07/26/2002
Model Year	2003	Body	KJTP74	JEEP LIBERTY LTD EDITION 4X2 SPORT UTILITY 4-DR	
In Service Dt	09/18/2002	Mileage	175,000	Dealer Zone	63 DALLAS
Plant	W	TOLEDO NORTH ASSEMBLY PLANT	Market	U	US
Color	PX8	BLACK CLEAR COAT			
Engine	EKG	ENGINE - 3.7L POWER TECH V6			
Transmission	DG4	TRANSMISSION-MULTI-SPEED AUTO, 45RFE			
Dealer	66770	DON ELLIOTT CHRYSLER-PLYMOUTH-	DODGE		
Dealer Address	1225 NORTH RICHMOND STREET				
Dealer City	WHARTON	Dealer State	TX	Dealer Zip	77488
Owner	[REDACTED]	Contact Type	TELEPHONE		
Address	[REDACTED]	Home Phone	[REDACTED]		
	HOUSTON TX	[REDACTED]	Country	UNITED STATES	

Product - Unknown - Unknown - Accident - Default	airbag deployed by itself
--	---------------------------

1. Who is calling and what is their contact information? Mother of the customer is contacting Chrysler

[REDACTED]

Houston TX

[REDACTED]

2. What happened?

Customer states that the airbag deployed while driving on the freeway for no apparent reason. Customer states she was just driving and talking to her passenger and it just deployed. Customer states that there was no accident but her daughter has a cut on the left arm. Customer states the passenger had to be her eyes to get off the freeway. Customer states that her daughter was unable to get out of the seat due to the seat belt locking up. [REDACTED] states that there has been many issues with this vehicle. Customer states that the vehicle has been in an accident before and the air bag did not deploy.

3. What is the current location of the vehicle?

[REDACTED]

Houston TX

[REDACTED]

Reassign to 82S

Per OGC Matrix, reassigned to 82T.

4/10/12 ASSIGNED TO LSE6. PAG

CAIR NUMBER 22102838 REQUEST EAA INSPECTION 04-10-2012 14:16

CAIR NUMBER 22102838 E-MAIL SENT TO EAA 04-10-2012 14:16

CCRG Open Date: 04/10/2012 13:54:55

Letter Sent: Acknowledgement 04/11/2012 10:05:20

PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 04/13/12 AT 11:09:31 22102838

Customer s mom called stating that her customer s vehicle is sitting in her driveway and it is a big inconvenience, customer s mom is needing some rental assistance, while this case is being investigated. Daughter is using moms vehicle and now mom is needing a rental.

writer is sending case back to PAG45 as this is an active SI case rental will be determined by PAG45.

4/17/12 SEND CAIR BACK TO AGENT. ALL CAIRS MUST GO THROUGH 82S/SI.

Per OGC Matrix, reassigned to 82T.

4/17/12 UPDATED CCRG FILE & CASE MANAGER. PAG

EA12-001
CHRYSLER
ENCLOSURE 4
LEGAL
KJ
After 10.4.11

MFD BY DAIMLERCHRYSLER CORPORATION DATE OF MFR 5-02 GVWR 2427 KG(05350 LB)

GVWR FRONT	WITH TIRES	RIMS AT	COLD
1240 KG(2750 LB)	P215/75SR16	16X7	227 KPA(33 PSI)
GVWR REAR	WITH TIRES	RIMS AT	COLD
1339 KG(2950 LB)	P215/75SR16	16X7	227 KPA(33 PSI)

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

VIN: 1J4GK4BK3[REDACTED] E: MPV SINGLE X DUAL



NOI: 051020 779AA PNT:PM1 VEHICLE MADE IN U.S.A. TRN:MSLS -0040503



54.935





LIBERTY 4x4



LIBERTY sport





Jeep

Jeep





Jeep

Jeep

87L



Jeep















Jeep













Lock Release ← → Lock Engage









HUNTER

HSP400

8


8

Lock

Lock





A close-up photograph of a person's hand, wearing a grey suit jacket and a white shirt cuff, pointing towards a dark rectangular area on the side of a white vehicle. The vehicle has a red taillight visible on the left and the word "Jeep" printed in black on the white surface. Below the "Jeep" logo, there is some smaller, less legible text. The dark rectangular area appears to be a shadow or a recessed part of the vehicle's bodywork.

Jeep
4x4
CRUICKSHANK



STADO

ChrisHired.com





Lock
Engage

Warning

Lower

↑
Raise



















RR

The image shows a close-up of a silver alloy wheel with a five-spoke design. The tire is dark and has the words 'RAIL GUMMER' embossed on it. A hand is holding a small white tag with the letters 'RR' written in black marker. The wheel is mounted on a dark surface, possibly a vehicle's hub.



REF







NEW YORK
G35838





















WARNING

DEATH OR SERIOUS
INJURY CAN OCCUR



NEVER ALLOW SEAT BACK TO LEAN AT AN
ANGLE GREATER THAN 90 DEGREES FROM UPRIGHT.
NEVER ALLOW SEAT BACK TO LEAN AT AN ANGLE
OF 90 DEGREES OR GREATER FROM UPRIGHT.
*SEAT IS NOT DESIGNED FOR RECLINING.

WARNING: HIGHER ROLLOVER RISK



AVOID ABRUPT MANEUVERS
AND EXCESSIVE SPEED.

ALWAYS BUCKLE UP.

SEE OWNER'S MANUAL
FOR FURTHER INFORMATION.











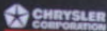


035807

Jeep







CHRYSLER
CORPORATION

DRB III™

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

KEEP

SYS

MAIN



CHRYSLER
CORPORATION

DRB III™

Unable to ID Module for
ORC

press any key to continue



100
150
200



BRAKE

door

Customer Assistance Inquiry Record (CAIR)#

20610672

Vin	1J4GK48K3 2W [REDACTED]	Open Date	03/28/2011	Built Date	05/10/2002
Model Year	2002	Body	KJTH74	JEEP LIBERTY SPORT 4X2 SPORT UTILITY 4-DR	
In Service Dt	08/22/2002	Mileage	110,000	Dealer Zone	63 DALLAS
Plant	W	TOLEDO NORTH ASSEMBLY PLANT	Market	U	US
Color	PW1	STONE WHITE CLEAR COAT			
Engine	EKG	ENGINE - 3.7L POWER TECH V6			
Transmission	DG4	TRANSMISSION-MULTI-SPEED AUTO, 45RFE			
Dealer	23657	CHRIS NIKEL CHRYSLER JEEP DODGE			
Dealer Address	2920 N ASPEN AVE				
Dealer City	BROKEN ARROW	Dealer State	OK	Dealer Zip	74012
Owner	[REDACTED]	Contact Type	LETTER		
Address	[REDACTED]	Home Phone			
	TULSA OK [REDACTED]	Country	UNITED STATES		

Product - Unknown - Unknown - Accident - Default	both air-bags have deployed.
Dealer - By-Pass - Default - Default - Default	
Product - Body / Trim / Paint Finish - Air Bag - Unjustified Deployment - Both	
Recall - F23: - Advise Owner/Incomplete Recall	

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

Preferred: [REDACTED]

Alternate: n/a

2. What happened? Customer was backing out of their driveway when they heard a ding noise in their vehicle and both front air-bags went off. Customer states they did not hit anything

3. What is the current location of the vehicle? Customer s driveway.

03.28.11

VEHICLE LOCATED AT: RESIDENCE

[REDACTED]

TULSA OK [REDACTED]

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, MG17

CAIR NUMBER 20610672 REQUEST EAA INSPECTION 03-28-2011 13:51

CAIR NUMBER 20610672 E-MAIL SENT TO EAA 03-28-2011 13:51

PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 03/31/11 AT 17:04:26 20610672

04.01.11

Reviewed EAA report and photos

Called SM Steve Jones at Chris Nikels and ok d repairs 918-830-7514 _

He will call me with prices.

I called and left a VMM for customer explaining and ref g to dir

Caller requesting to speak with Case Manager.

04.12.11

Tried to call customer - N/A
Called dealer - spoke to Steve and auth d a rental
Returned Micheal Blue, her Attorneys call and asked for a letter of Rep be
faxed in
POSTMARK DATE: 041211; DATE RECEIVED: 041311

04.13.11
Attorney: Michael M Blue 405-657-9673
Involved due to injuries and damages
Lauren Edghillokay
alan spoke with the attorney
injuries are minor
so the attorney is going to send them to you (primarily medical and lost wa
ges)
he said that you can continue to handle the matter and the atty demand
alan said he can send you his notes if you like as well
and if you want his notes just let him know
name is alan degraw
Called dealer and left a VMM - I need them to do recall F23 ball joints
when vehicle is in for air bag repairs

04.18.11
Returned Steves call - has to leave a VMM
04.20.11 - Started PA claim - he will call with final total with rental

11.15.11
Photo retained in file.
POSTMARK DATE: 111111; DATE RECEIVED: 111511

11.21.11
Attorney: Michael M Blue 405-657-9673
Based on new info - sending file and photo to 82T for their review and
handling
11/21/11 FORWARD TO PRODUCT LIABILITY.

12.02.11
Attorney Call Back Seeking update on 82T -
Per OGC Matrix, reassigned to 82T. MG17
12/2/11 FORWARD TO PRODUCT LIABILITY. PAG

CONFIDENTIAL - Prior Approval Required Before Duplicating**Preliminary Vehicle Investigation Report(PVIR)**

CAIR# 20610672

YEAR	BRAND	VEHICLE IDENTIFICATION NUMBER		MO/DY-HR	ODOMETER	IN-SERVICE
2002	JEEP LIBERTY SPORT 4X2 SPORT UTILITY 4-DR	1J4GK48K32W [REDACTED]		05-10 20	130645	08/22/2002
NAME OF OWNER		ADDRESS/LOCATION		CITY	STATE	COUNTRY
[REDACTED]		[REDACTED]		TULSA	OK	USA
ZIP	COLOR	MODEL	HOME PHONE		BUSINESS PHONE	
[REDACTED]	Stone White Clear Coat	KJT	[REDACTED]		[REDACTED]	
SELLING DEALER NAME		BUSINESS CENTER	DLR. CODE	CITY	STATE	COUNTRY
CHRIS NIKEL CHRYSLER JEEP DODGE		63	23657	BROKEN ARROW	OK	USA
INSPECTOR - NAME FIRST, LAST, MIDDLE		INSPECTOR'S COMPANY		INSPECTOR'S PHONE NO.		
Larry Grummer D		EAA		405-691-3320		
DAMAGE ESTIMATE				REPAIR ESTIMATE		
<input checked="" type="radio"/> MINOR <input type="radio"/> MODERATE <input type="radio"/> TOTAL LOSS				\$.00		

INTERVIEWINTERVIEW WITH: DRIVER OWNER OTHER DRIVER/OWNER

NAME: LAST, FIRST, MIDDLE [REDACTED]

INTERVIEW DATE:	DATE OF INCIDENT:	TIME OF INCIDENT	INSPECTION DATE:
03/31/2011	03/20/2011	05:15 <input type="radio"/> AM <input checked="" type="radio"/> PM	03/31/2011

1. DRIVER'S DESCRIPTION OF EVENT: **Ms. [REDACTED] states she started her vehicle, placed the transmission in reverse and began backing out of her home driveway. Ms. [REDACTED] states within moments she heard the instrument cluster chime and when she looked down to check her gauges both front airbags deployed. Ms. [REDACTED] states she did not impact any objects prior to airbag deployment.**

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

If Yes, complete section "B"

If Yes, What light:

IMPORTANT: SHOW THIS REPORT TO NO ONE & ONLY STATE FACTS (DRAW NO CONCLUSIONS)

Help Key

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

INFORMATION: POLICE/AGENCY REPORT #: ALL REPORTS/PHOTOS BY OTHERS

- ADDRESS OF INSPECTION
 Address **2920 N Aspen**
 1
 Address
 2

- EVIDENCE OF TAMPERING OR PRIOR DISASSEMBLY

 YES NO

- IF YES, DESCRIBE AND PHOTOGRAPH

YES NO

UNKNOWN

IF YES, ENCLOSE COPIES OF REPAIR ORDERS

City **Broken Arrow**

State **OK**

Zip **74012**

Phone **918-830-7514**

PART B - EXTERIOR/INTERIOR VEHICLE DAMAGE

REQUIRED PHOTOGRAPHS:

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

No exterior vehicle damage. No undercarriage, frame, suspension or tire/wheel damage. Driver frontal airbag deployed and front passenger frontal airbag deployed. Ms Chamblis states she received bruises to her chest and face and is sore all over her upper body.

INFORMATION:

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

Next

PART C - AIRBAG(S)

REQUIRED PHOTOGRAPHS

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

AECM INFORMATION

- SOFTWARE VERSION:

NA

- SERIAL NUMBER :

NA

- PART NUMBER :

NA

- DOES AIRBAG WARNING LIGHT CYCLE ON?

YES NO N/A

- ARE WARNING LABELS PRESENT (PHOTO)

YES NO N/A

- RECORD LABEL PART NUMBER

No part number

COMPLETE PART D

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

YES NO IF NO, EXPLAIN

DRB would not communicate with module.

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

- WAS AIRBAG DEPLOYED?

DRIVER YES NO

IF NO, EXPLAIN

PASSENGER YES NO

IF NO, EXPLAIN

SIDE AIRBAG YES NO 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

DO NOT ERASE DRB READINGS

IS VEHICLE EQUIPPED WITH PASSENGER AIRBAG DEFAULT SWITCH?

YES NO

IF YES,

NOTE POSITION OF PASSENGER A/B 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

PART D - SEATS/SHOULDER BELTS

REQUIRED PHOTOGRAPHS:

- OVERALL SEAT BELTS I/B & O/B
- CLOSE UP OF ANY IRREGULARITIES
- LATCHPLATE WEAR
- CLOSE UP D-RING TO SHOW LOADING
- OVERALL OF SEAT
- CLOSE UP OF DAMAGE
- RECORD DTC'S:

INFORMATION:

- LOCATE SEAT BELT LABELS AND RECORD ALL INFORMATION (SOME LABELS ARE SEWN TO WEBBING, OTHER LABELS ARE ON THE RETRACTOR FRAME: INBOARD SEAT BELT LABELS ARE NEAR THE FLOOR):

Labels not present.

- RECORD ALL INFORMATION STAMPED ON LATCHPLATE

Driver: T0085, Ft pass: T0084

- PRETENSION DEPLOYED?

YES NO UNKNOWN

- EXISTING LOCATION OF RECLINER - DESCRIBE THE LOCATION AND PICTURE OF SEAT BACK WITH B PILLOR AS REFERENCE AND INCLINOMETER READING

10 degrees rearward.

EXISTING LOCATION OF HEAD RESTRAINT (MEASURE GAP UNDER HEAD RESTRAINT):

0" (built into seat)

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

NOTE RESULTS

- 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

- 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
1" rearward.

PART - E TRANSMISSION NOT APPLICABLE

[Previous](#)

[Next](#)

PART - F UNINTENDED ACCELERATION NOT APPLICABLE

PART - G BRAKES NOT APPLICABLE

PART - H STEERING/SUSPENSION/TIRES NOT APPLICABLE

PART - I AXLE/DIFFERENTIAL NOT APPLICABLE

PART J - ADDITIONAL COMMENTS (DO NOT DRAW ANY CONCLUSIONS)

Driver frontal airbag deployed and front passenger frontal airbag deployed. Vehicle does not appear to have been involved in a frontal impact collision. No engine compartment deformation. No damage or witness markings indicating impact with foreign object to the under body, frame, suspension or tire/wheel assemblies. Vehicle appears to be well maintained and in very good overall condition. Airbag lamp illuminates when the ignition key is turned to the "ON" position and remains illuminated during the ignition cycle. Check engine light remains illuminated when the engine is running. The DRB was unable to ID Module for ORC. No communication was established between the DRB on any of the vehicle systems. No evidence of water or moisture damage to interior of vehicle or airbag system components. No evidence of tampering with airbag system components. No vehicle modifications, after market equipment or out-of-place items found on vehicle. Seat belts locked and held in place when a quick tug was given to the webbing.

[Previous](#) [Form Approved](#) [Returned for corrections](#)

20610672

MICHAEL M. BLUE
ATTORNEY AT LAW
2500 GLENWOOD CIRCLE
EDMOND, OKLAHOMA 73034
PHONE: (405) 657-9673 FAX: (405) 844-1473
EMAIL: MICHAEL.BLUE@COX.NET

April 12, 2011

VIA FAX (248) 512-1322

Chrysler Corporation

Attention: Maggie Gentry (248) 944-7084

RECEIVED

APR 13 2011

Claim No.: 20610672

Date of Accident: March 27, 2011

Type of Accident: Airbag Deployment

Place of Accident: [REDACTED] South, Tulsa, Oklahoma [REDACTED]

My Client: [REDACTED]

SPECIAL INVESTIGATIONS

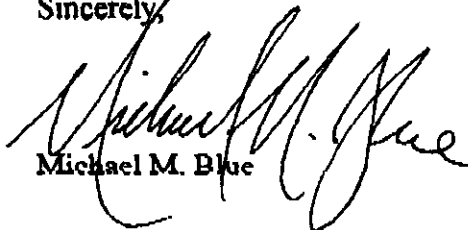
Dear Maggie:

I have been retained to assist [REDACTED] with her claim involving her injuries and damages she sustained in an airbag deployment accident involving a 2002 Jeep Liberty which occurred on March 27, 2011 in Tulsa, Oklahoma. I would request that any further contact regarding this matter be directed to my office.

If, during your company's investigation, you or others have obtained recorded statements and/or photographs, please forward a copy to me via email: michael.blue@cox.net. I also request that you provide my office with a copy of any report or evaluation that you may have obtained from your consultants, specialists, or other persons hired or retained by you to investigate this incident, the subject property damage, personal injury and/or liability. Please contact me if there are any costs associated with this request.

I look forward to hearing from you soon to discuss this matter.

Sincerely,


Michael M. Blue

cc: [REDACTED]
Ms [REDACTED]

Michael M. Blue
BLUE LAW

Attorney-at-Law
2500 Glenwood Circle
Edmond, OK 73034

Phone: (405) 657-9673 Fax: (405) 844-1473
Michael.Blue@Cox.Net

(SI)
20610672

November 11, 2011

TELEFACSIMILE COVER SHEET

13 Pages (including this page) are being sent by Attorney, MICHAEL M. BLUE, with BLUE LAW, P.L.L.C., for immediate delivery to:

Chrysler Corporation
Attention: Maggie Gentry
(248) 944-7084 Fax: (248) 512-1322

RECEIVED
NOV 15 2011
SPECIAL INVESTIGATIONS

FILE/CASE NAME: [REDACTED]

CLAIM NO.: 20610672

MY FILE NO.: 2011-BC

TITLE/DESCRIPTION OF DOCUMENT(S): Settlement demand and attachments. Please give me a call at your earliest convenience. Michael M. Blue

THE ORIGINAL WILL NOT FOLLOW or WILL FOLLOW BY:
 U.S. MAIL
 OVERNIGHT MAIL
 HAND DELIVERY.

Please call (405) 657-9673 if you experience any difficulty with this transmission.

The information contained in this telefacsimile is confidential, attorney-privileged and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you received this communication in error, please immediately notify me. Thank you.

Member: ABA, OBA, AAJ (ATLA) & OAJ (OTLA)
Selected To Oklahoma Super Lawyers 2009-Present
AV® Preeminent™ Martindale-Hubbell Rating

Michael M. Blue
BLUE LAW

Attorney-at-Law
 2500 Glenwood Circle
 Edmond, OK 73034
 Phone: (405) 657-9673 Fax: (405) 844-1473
 Michael.Blue@Cox.Net

November 11, 2011

VIA FAX (248) 512-1322

Chrysler Corporation
 Attention: Maggie Gentry (248) 944-7084

Claim No.: 20610672
 Date of Accident: March 27, 2011
 Type of Accident: Airbag Deployment
 Place of Accident: [REDACTED] Tulsa, Oklahoma [REDACTED]
 My Client: [REDACTED]

Dear Maggie:

As we have previously discussed, I have been retained to assist [REDACTED] with her claim involving her injuries and damages she sustained in an air bag deployment accident involving a 2002 Jeep Liberty, which occurred on March 27, 2011 in Tulsa, Oklahoma. In addition, to her physical injuries, discussed below, [REDACTED] began having recurring nightmares about the incident. Although more than 7 months have passed since the injury, [REDACTED] continues to have these nightmares. As a result of the fear caused by the unexpected deployment of the defective air bag, [REDACTED] is apprehensive about driving her vehicle, notwithstanding the assurances her vehicle has been properly repaired. It is always something in the back of her mind each time she enters her vehicle. She would be better off mentally, and could avoid the accompanying stress, if she were driving a vehicle not associated with her traumatic experience.

[REDACTED] sustained a laceration and contusion on her left breast when the air bag struck her. The impact resulted in a serious and painful bruise. (I have emailed a picture of this injury to you.) The day after the air bag incident, [REDACTED] was still experiencing pain and the huge bruise had become more pronounced. [REDACTED] went to her physician, Paul Higbee, M.D., whose examination revealed she had suffered from a severe breast contusion, large ecchymosis, and laceration. (See medical record, Exh. "1".) Dr. Higbee prescribed pain medication (Lortab 550 mg), as needed, and directed her to follow up if the pain or

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Page 1 of 4

condition worsened. The office visit was **\$79.00**. The mileage for two visits to Dr. Higbee's office was 22 miles round-trip. Using the IRS's travel compensation rate of 55.5 cents per mile, [REDACTED] travel expenses for Dr. Higbee are **\$12.21**. While [REDACTED] physician has indicated that it is expected she will heal from this impact injury, it is unknown if the injury will result in future complications or problems, or if it will make her more susceptible for other problems. Under certain circumstances and situations, [REDACTED] still experiences twinges of pain. This is yet another worry in the back of [REDACTED] mind.

Just prior to the airbag deployment, [REDACTED] had undergone some extensive dental work. The air bag impacted her face, chin and mouth, and damaged her brand new dentures. (See medical records attached hereto, Exh. "2".) An X-ray was taken of the impact site, at a cost of **\$55.00**. While her dentist was kind enough to make the repairs to [REDACTED] brand new dentures at no charge, the charge actually should have been **\$75.00** to repair the dentures. (See the letter attached hereto, Exh. "3".) [REDACTED] traveled a total of 48 miles for the two dentist visits. At 55.5 cents per mile, the total travel expense for these visits was **\$26.64**.

As a result of the air bag impact, and the gas and powder expelled during the deployment, Betty's contact lenses were ruined, and had to be replaced at a cost of **\$130.00**. [REDACTED] traveled to her ophthalmologist for the replacement contacts, which was 22 miles roundtrip @ 55.5 cents per mile for a total of **\$12.21**.

[REDACTED] injuries also caused her to miss work. She missed a total of five 5-hour work shifts (April 1, 3, 4, 7 and 8, 2011) in connection with her injuries. (See May 2, 2011 letter from DIRECTV, Exh. "4".) [REDACTED] missed 25 hours of pay at \$14,9940 per hour for a total of **\$374.85**.

[REDACTED] made 6 trips to the Chrysler dealership to have her vehicle inspected, repaired and for follow-up visits for a total of 114 miles. At 55.5 cents per mile, Ms. [REDACTED] seeks reimbursement of **\$63.27** for these travel expenses. The time, hassle and aggravation of having to deal with car repairs and the service department should not be minimized.

A few more delicate matters should also be addressed. The air bag deployment caused [REDACTED] to have an accidental fluid elimination, which soiled the driver's seat. A vehicle detail company near her home (Pro Detail) has given [REDACTED] an estimate of **\$150.00** to clean the seat and detail the vehicle. The impact of the air bag also caused the metal fastening clasps (hooks) on her **\$55.00** bra to pull and straighten. The brassiere was ruined.

My initial investigation into the air bag defect reveals NHTSA's Office of Defects Investigation (ODI) has recently instituted an investigation into the sudden and unexpected

air bag deployment on the 2002 Jeep Liberty. (See NHTSA Investigation Summary, Exh. "5".) Specifically, the NHTSA investigation is looking into defects relating to the frontal air bags, frontal sensor/control module and frontal/driver side inflator module. The summary provides:

ODI has received seven consumer complaints on model year 2002-2003 Jeep Liberty vehicles including four owners alleging that the driver frontal air bag deployed without a crash and three owners alleging that both the driver and passenger frontal air bags suddenly deployed without a crash. Five of the seven complaints alleged an injury incident totaling five injuries. Six of the seven owners stated that their vehicle was being operated on a residential roadway with three alleging that they were traveling on a highway at speeds of 45 mph or greater when the air bag(s) deployed. Some owners noted that the air bag light had been illuminated, or had intermittently illuminated prior to the deployment. In addition, ODI has received 32 early warning field reports involving 10 injury incidents totaling 10 injuries. The field reports indicated that inspections of the vehicles did not reveal any evidence of exterior vehicle impacts or damage that could have reasonably caused the air bags to deploy. A preliminary evaluation has been opened to investigate the alleged defect.

(See NHTSA Investigation Summary, Exh. "5". It is unknown, at this time, if [REDACTED] incident is included among the complaints discussed in this investigation summary.)

Additionally, a recent September 27, 2011 AP report states:

NHTSA investigating possible Jeep air bag problem

WASHINGTON (AP) -- Federal regulators are investigating reports that the air bags on some Jeep Liberty sport utility vehicles are suddenly going off without a crash happening. The National Highway Traffic Safety Administration says on its website that in four of seven confirmed cases, the front driver-side air bag went off, while in three [incidents], both the driver- and passenger-side air bags deployed. The investigation involves an estimated 387,356 vehicles made during the 2002 and 2003 model years. Five of the seven reports involved injuries. Some owners said they saw the air bag light come on, or intermittently come on, before the air bags went off.

(See AP News Report, Exh. "6".)

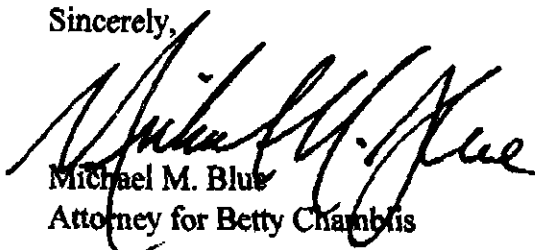
It appears that Chrysler/Jeep have received numerous reports of other similar injury producing air bag deployments on the 2002 Jeep Liberty, yet did nothing to: (1) Inform owners about the potential hazard; (2) Inform owners they should have the air bags and components inspected or replaced; (3) Notify dealers and/or certified Chrysler/Jeep mechanics to be on the lookout for claims for repair of the subject vehicle, in order that they could put owner(s) on notice of the potential hazard associated with operating the 2002 Jeep Liberty; and/or (4) Cause nationwide news, radio and/or other forms of information distribution of the numerous complaints lodged by consumers due to injuries suffered as a result of the defective product.

What is most disturbing and alarming about the information set forth above, is that these other incidents of sudden and unexpected air bag deployments occurred while the drivers were traveling on *residential roadways* and on *highways at speeds of 45 mph or greater*. It is, therefore, clear each such driver was not only exposed to the risk of injury from the erratic air bag deployment itself, but were also unknowingly placed in the dangerous position of losing control of the vehicle, and crashing or colliding with other vehicles (or, *God forbid*, a child or other pedestrian). It is not hard to imagine an Oklahoma jury could conclude this information shows Chrysler/Jeep was either aware, or did not care, that there was a substantial and unnecessary risk that their defective product would cause serious harm or injury to others. It is certainly possible these jurors could find Chrysler/Jeep was guilty of conduct evincing a reckless disregard for the lives and safety of others and award punitive damages for that conduct.

██████████ vehicle has been repaired. She has incurred approximately \$1,033.00 in out of pocket expenses, medical charges, lost wages and travel expenses. In an effort to bring this matter to a prompt resolution, without forcing ██████████ to invest further time and expense in filing and prosecuting a lawsuit, ██████████ has authorized me to settle her claims for \$55,000.00 (which is equal to about 34 minutes of Chrysler's 2011 third quarter profits) in return for a release of all claims associated with this incident.

I look forward to hearing from you soon to discuss this matter.

Sincerely,



Michael M. Blue
Attorney for Betty Chambis

cc: ██████████

Member: ABA, OBA, AAJ (ATLA) & OAJ (OTLA)
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Progress Notes**Page: 1**

Name: [REDACTED]

Date Printed: 04/27/11

SEX:F AGE:57 years

03/28/11 : 11:38am

injury left breast

397 : :

Allergies:

LOPID (muscle pain)

BMI: 39.51 kg/m2**Subjective:**

This 57 years old female presents today for injury to left breast. Her air bags deployed as she was driving out of her drive way. She did not have an accident it just went off. She has pain and bruises in the left breast.

[REDACTED] is accompanied in Treatment Room by self

[REDACTED] is not pregnant, homebound or hospice.

airbag deployed s mva (no car trauma: car was stopped), but it knocked breast out of bra now w L breast pain: + lg bruise & laceration

Objective:

Bp: 138/90, Left Arm, Pulse: 80

Weight: 230 lbs

General appearance: female. In no apparent distress.

Skin: ~10 cm diam ecchy L med breast: no induration or fluctuance
small central red crust ~1.5 cm length (barely palpable)

Assessment:**CONTUSION BREAST : 922.0**

breast contusion (w lg superficial ecchymosis w apparently superficial laceration)

Office Visit Level:

OV Level 2 Est Pt: 99212:

Plan of Action:**Recommend:**

no chg

close obs: fu if worse

Rx: LORTAB 10/500MG 1 q4h , 180, Ref: 0

EXHIBIT "1"

Printed using Practice Partner®

Progress Notes

Page: 2

Name: [REDACTED]

ID [REDACTED]

Date Printed: 04/27/11
SEX:F AGE:57 years

-
- # SIGNED BY Paul T Higbee, MD (397) 03/28/2011 01:10PM
 - # REVISED BY Anette Blakeman, CPC (S04) 03/30/2011 03:04PM

Patient Notes Master
FOR
Betty G. Chamblis

Date Entered	Format	Type	Tooth	Status	User	
1/24/2011	Text	Account		Verified	Dustin Ogden	This note has not been modified
01/25/2011 Appointment for 01:30PM on Assistant B, reason specified as Failed						
1/29/2011	Text	General		Verified	Lois Vanderliden	This note has not been modified
Created Patient Medical History						
1/25/2011	Text	Chart		Verified	Stephanie Hedrick	This note has not been modified
no pano DR. Sims to examine. ah						
1/26/2011	Text	Rx Writer		Verified	Dustin Ogden	This note has not been modified
Sims, Geoffrey ; Amoxicillin 500mg; 24tabs; 0 refills						
1/25/2011	Text	General		Verified	Stephanie Hedrick	This note has not been modified
ex. of BT inwd.gp						
1/26/2011	Text	Prm Submission		Verified	Leslie Stoneberger	This note has not been modified
Insurance Claim From 1/25/2011 was Submitted to Prm. Insurance Company: Aetna, Payer ID: 60064						
1/31/2011	Text	Rx Writer		Verified	Cassandra Crowley	This note has not been modified
Sims, Geoffrey ; Amoxicillin 800mg; 20tabs; 0 refills						
1/31/2011	Text	Rx Writer		Verified	Cassandra Crowley	This note has not been modified
Sims, Geoffrey ; Percocet 10/650mg; 20tabs; 0 refills						
1/31/2011	Text	Rx Writer		Verified	Cassandra Crowley	This note has not been modified
Sims, Geoffrey ; Halcion .25mg; 2 tabs; 0 refills						
1/31/2011	Text	General		Verified	Cassandra Crowley	This note has not been modified
Alignate Impressions and Putty bite registration for imm P/F Select sh A1, BP 116/72. ---PT WANTS N2O at ext/del.--- CJC						
1/31/2011	Text	General		Verified	Stephanie Hedrick	This note has not been modified
ext/del BT imm. after care and go given. bp 134/81...ah						
1/31/2011	Text	General		Verified	Stephanie Hedrick	This note has not been modified
Anesthetic used:septocain,ilocaine Cephalax given 3,6 Tooth #3,4,6,7,8,9,10,11,12,13,14,20,21,22,23,24,26,28,27,20,29 Delivered F/F After care instructions given, monitored vitals.						
2/4/2011	Text	Prm Submission		Verified	Leslie Stoneberger	This note has not been modified
Insurance Claim From 1/31/2011 was Submitted to Prm. Insurance Company: Aetna, Payer ID: 60064 Attachment sent.						
2/4/2011	Text	Prm Submission		Verified	Leslie Stoneberger	This note has not been modified
Insurance Claim From 1/31/2011 was Submitted to Prm. Insurance Company: Aetna, Payer ID: 60064						
2/4/2011	Text	Prm Submission		Verified	Leslie Stoneberger	This note has not been modified
Insurance Claim From 1/31/2011 was Submitted to Prm. Insurance Company: Aetna, Payer ID: 60064						
2/7/2011	Text	Chart		Verified	Dustin Ogden	This note has not been modified
PI in for ad. Pip and ad BT Also per dr sims placed 1st st. Dr Sims quoted pt 1475 for mixie. DMD						

EXHIBIT "2"

TIME 4:27 PM

Thomas J. Kennedy Of Oklahoma DDS, P.C.

DATE 4/16/2011

Patient Notes Master

FOR

Betty G. Chamblis

<u>Date Entered</u>	<u>Format</u>	<u>Type</u>	<u>Tooth</u>	<u>Status</u>	<u>User</u>	
3/11/2011	Text	Account		Verified	Laura Beeler	This note has not been modified
<u>03/11/2011 Appointment for 10:00AM on Assistant 3, reason specified as Cancelled</u>						
3/16/2011	Text	Statement		Verified	Leslie Stoneberger	This note has not been modified
<u>Statement Processed</u>						
3/21/2011	Text	Chart		Verified	Dustin Ogden	This note has not been modified
<u>PP with /F too long all over. I shortened. Pt very pleased. CJC</u>						
3/30/2011	Text	General		Verified	Dustin Ogden	Modified By: Dustin Ogden On: 4/16/2011
<u>ex pt -pt stated had air bags deployed- has minor swelling left cheek-should return to normal in few days-pt stated small chip in R occurred .gs Pt in all bruised up from a car accident. P's denture was chipped on the lower. Pt has swelling updated pano and had dr alina examine DMD</u>						
3/31/2011	Text	Statement		Verified	Leslie Stoneberger	This note has not been modified
<u>Statement Processed</u>						
4/12/2011	Text	Statement		Verified	Leslie Stoneberger	This note has not been modified
<u>Statement Processed</u>						
4/14/2011	Text	Account		Verified	Lois Vanderlinden	This note has not been modified
<u>Patient aware of balance said she was going to pay if next time she comes in. LV</u>						
4/16/2011	Text	Chart		Verified	Laura Beeler	This note has not been modified
<u>Removed soft liner and replaced. Pt said that even though it is charted that she got new SLs on 3,30 she did not. So today's are #2 CJC</u>						

Dentures and Dental Services

Catoosa, OK

Thomas John Kennedy of Oklahoma, DDS, P.C. and Associates

1875 N. Highway 66

P.O. Box 667 Catoosa, OK 74015

Phone: (918) 266-2906

Fax: (918) 266-2912

The standard price for denture repair is \$75.00.

Sincerely

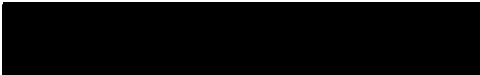
Management

EXHIBIT "3"



DIRECTV.

May 2, 2011



Tulsa, Ok

This is to confirm you are an active part time employee with DIRECTV, Inc. and were hired on March 28, 2005. Our records show your current hourly rate is \$14.9940 and your current shift 20 hours per week. At your request, I am verifying that you have missed the following days since April 1, 2011:

April 1
April 3
April 4
April 7
April 8
April 29

Please let me know if you have any questions regarding this information.

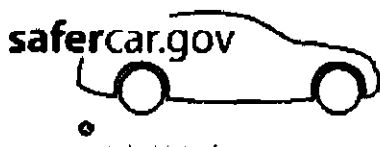
Take care,

A handwritten signature in black ink, appearing to be 'Jennifer Ha'.

Jennifer Ha
HR Generalist
918/280-2234
918/280-2050 (fax)
DIRECTV, Inc.

CC: File
Enclosures

EXHIBIT "4"



[Print](#)

Defects - Search Results

1 Record(s) Displayed.

Report Date: September 27, 2011 at 02:21 PM
Search Type: **VEHICLE**
Model Year : 2002
Make: **JEEP**
Model: **LIBERTY**

NHTSA Action Number:
PE11035

NHTSA Recall Campaign Number:
N/A
Model: LIBERTY

Make: JEEP
Manufacturer : CHRYSLER GROUP LLC

Model Year : 2002

Component(s) :

AIR BAGS:FRONTAL

AIR BAGS:FRONTAL:SENSOR/CONTROL MODULE

AIR BAGS:FRONTAL:DRIVER SIDE INFLATOR MODULE

Date Investigation Opened : September 23, 2011

Date Investigation Closed : Open

Summary:

ODI has received seven consumer complaints on model year 2002-2003 Jeep Liberty vehicles including four owners alleging that the driver frontal air bag deployed without a crash and three owners alleging that both the driver and passenger frontal air bags suddenly deployed without a crash. Five of the seven complaints alleged an injury incident totaling five injuries. Six of the seven owners stated that their vehicle was being operated on a residential roadway with three alleging that they were travelling on a highway at speeds of 45 mph or greater when the air bag(s) deployed. Some owners noted that the air bag light had been illuminated, or had intermittently illuminated prior to the deployment. In addition, ODI has received 32 early warning field reports involving 10 injury incidents totaling 10 injuries. The field reports indicated that inspections of the vehicles did not reveal any evidence of exterior vehicle impacts or damage that could have reasonably caused the air bags to deploy. A preliminary evaluation has been opened to investigate the alleged defect.

1200 New Jersey Avenue, SE, West Building Washington DC 20590 USA
1.888.327.4236 TTY 1.800.424.9153



EXHIBIT 151

Published: September 29, 2011

NHTSA investigating possible Jeep air bag problem

By The Associated Press

Federal regulators are investigating reports that the air bags on some Jeep Liberty sport utility vehicles are suddenly going off without a crash happening.

The National Highway Traffic Safety Administration says on its website that in four of seven confirmed cases, the front driver-side air bag went off, while in three both the driver- and passenger-side air bags deployed.

The investigation involves an estimated 387,356 vehicles made during the 2002 and 2003 model years. Five of the seven reports involved injuries.

Some owners said they saw the air bag light come on, or intermittently come on, before the air bags went off.

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EXHIBIT "6"

EA12-001
CHRYSLER
ENCLOSURE 4
LEGAL
KJ
After 10.4.11

TO KOLEY 30 LB)

P235/70R

NR REAR

WITH TIRES

429 KG(3150 LB)

P235/70R

THIS VEHICLE CONFORMS TO ALL AP
PREVENTION STANDARDS IN EFFECT

IN: 1J8GK58K63W



TYPE



MFD BY DAIMLERCHRYSLER CORPORATION DATE OF MFR 8-02 GVWR 2427 KG(05350 LB)

GAWR FRONT	WITH TIRES	RIMS AT	COLD
1248 KG(2750 LB)	P235/70R16	16X7	227 KPA(33 PSI)
GAWR REAR	WITH TIRES	RIMS AT	COLD
1429 KG(3150 LB)	P235/70R16	16X7	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: 1J8GK58K63W [REDACTED] TYPE: MPV SINGLE X DUAL



MDH: 082409 776AB PNT:PB7 VEHICLE MADE IN U.S.A. TRM:DLL2 4648503



Jeep

10-12

4 3



EZ TAG
ELECTRONIC ZONE TAG
CALIFORNIA DEPARTMENT OF TRANSPORTATION





67004639

10

HARRIS

Vehicle Reg



T
DEPART

4



Jeep

10-12
4 3

LIBERTY



LIBERTY LIMITED EDITION

33



GOODSON
Jeep

GOODSON

FIVE STAR



Jeep[®]

THERE'S ONLY ONE

www.goodsonauto.com

3.7L





soz

STAR



ep

ONLY ONE

dsonauto.com

3.7L

LIBERTY



LIBERTY LIMITED



LIBERTY 2.8

RAM 1500





Jeep

SUPER







Jeep



Jeep

SRS
AIRBAG

PULL
MIST









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: HIGHER ROLLOVER RISK



AVOID ABRUPT MANEUVERS
AND EXCESSIVE SPEED.

ALWAYS BUCKLE UP.

SEE OWNER'S MANUAL
FOR FURTHER INFORMATION.

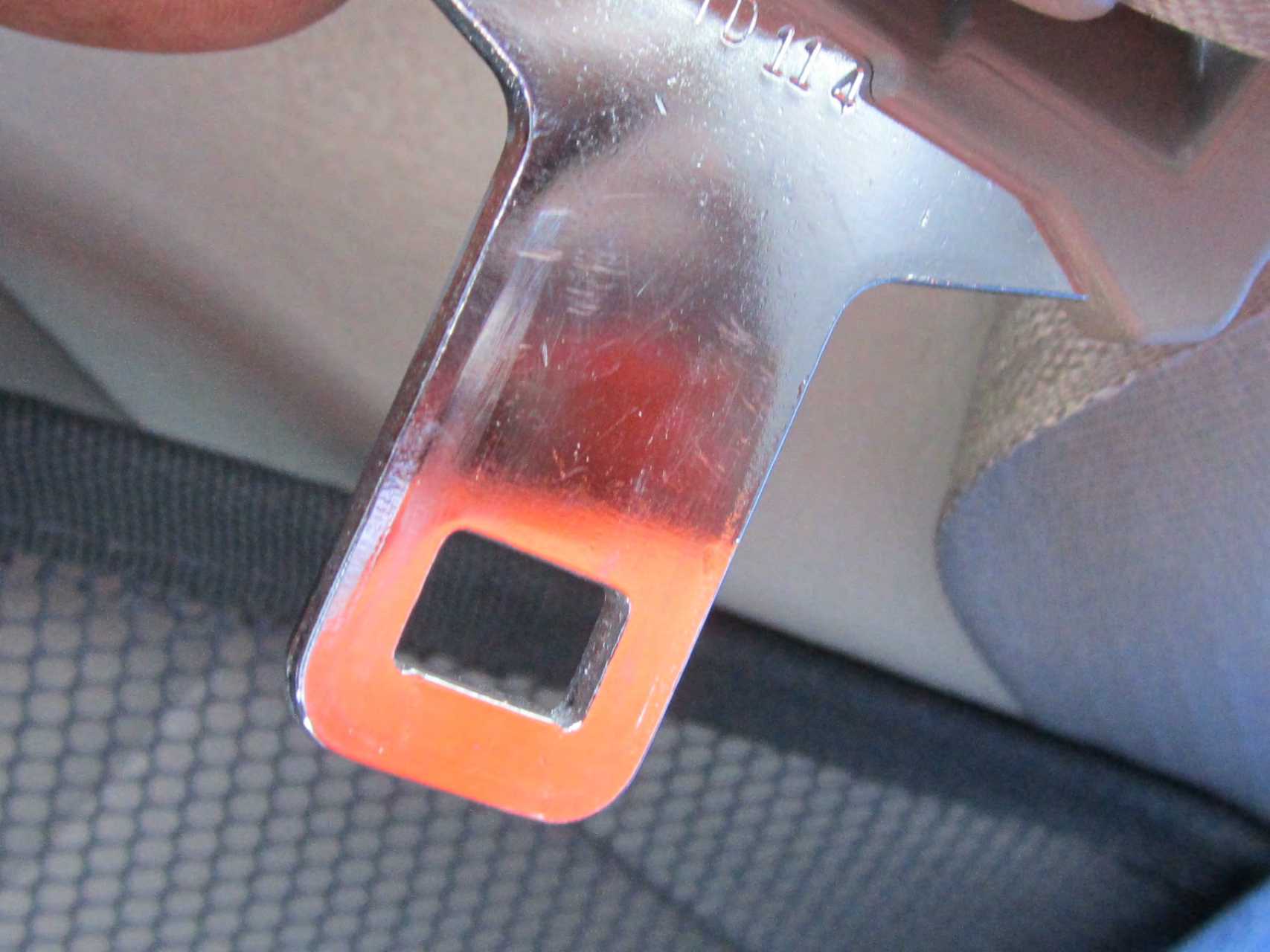




PRESS

PRESS





TD 114











ALPINA DRIVE

P R N D 2 1

SUPERSTARS #1 HITS REI

SUPERST
#1 HITS REI

THE WOOD M...































Jeep



MANUAL FOR
OPERATION
AND CARE

NOTE

75 OR 8-82



Jeep

SEE US AT THE
SHOW
STAND #101
9/14, 15/16
10/17





SUPERSTARS #1 HITS REMIXED

HILARY SWANK
SUPERSTARS #1 HITS REMIXED





PRESS

PRESS



10112



TD 112









200195

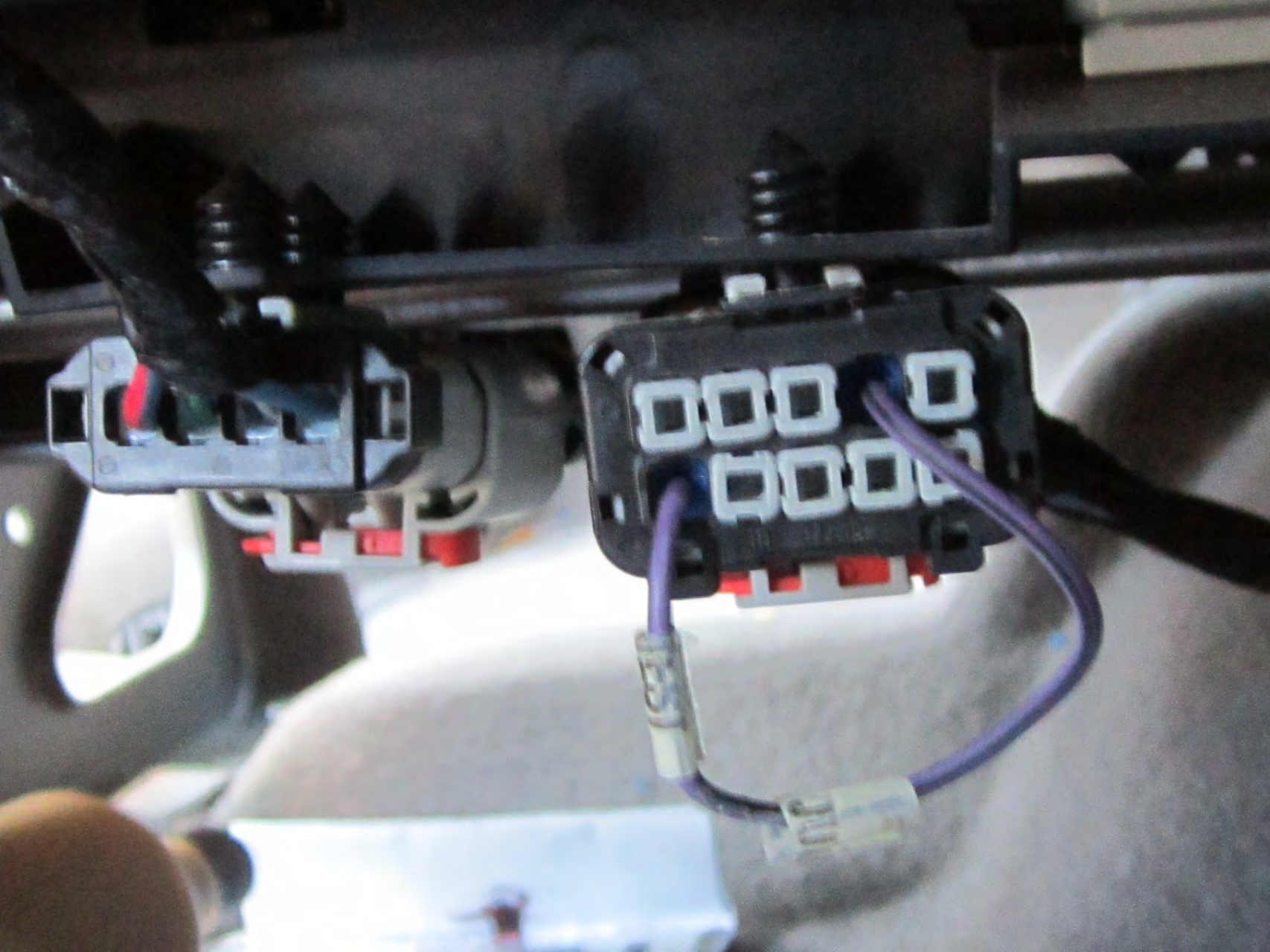


















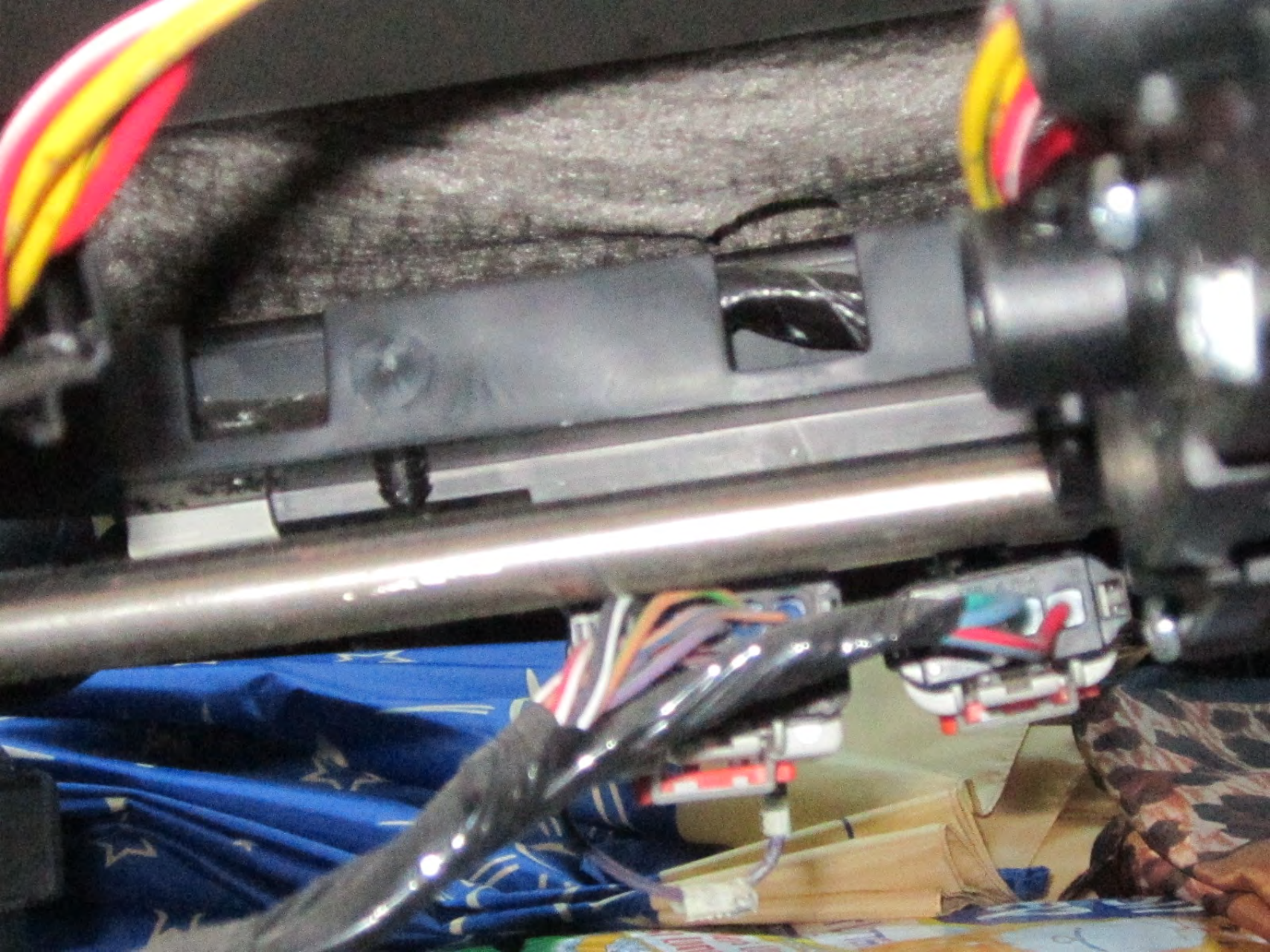
NEW! Improved Odor Control Technology

Carbon Keeps Litter
Fresh Longer

Fresh
Step

CLAY CAT LITTER

7





**AIR
BAG**

RPM x1000



BRAKE





**TRANS
TEMP**

MPH km/h

118524

118524

Duralast
AUTOMOTIVE BATTERY

WARRANTY BY MAINTENANCE
This battery is warranted to perform properly for 36 months or 50,000 miles, whichever comes first, if maintained properly. The warranty is void if the battery is abused, discharged, or if the vehicle is not properly maintained. For more information, please contact your local Duralast store.

Part Number	34-DL	Code	660	Capacity	625	Reserve Capacity	115
Draining		Amperes		at 25°C			

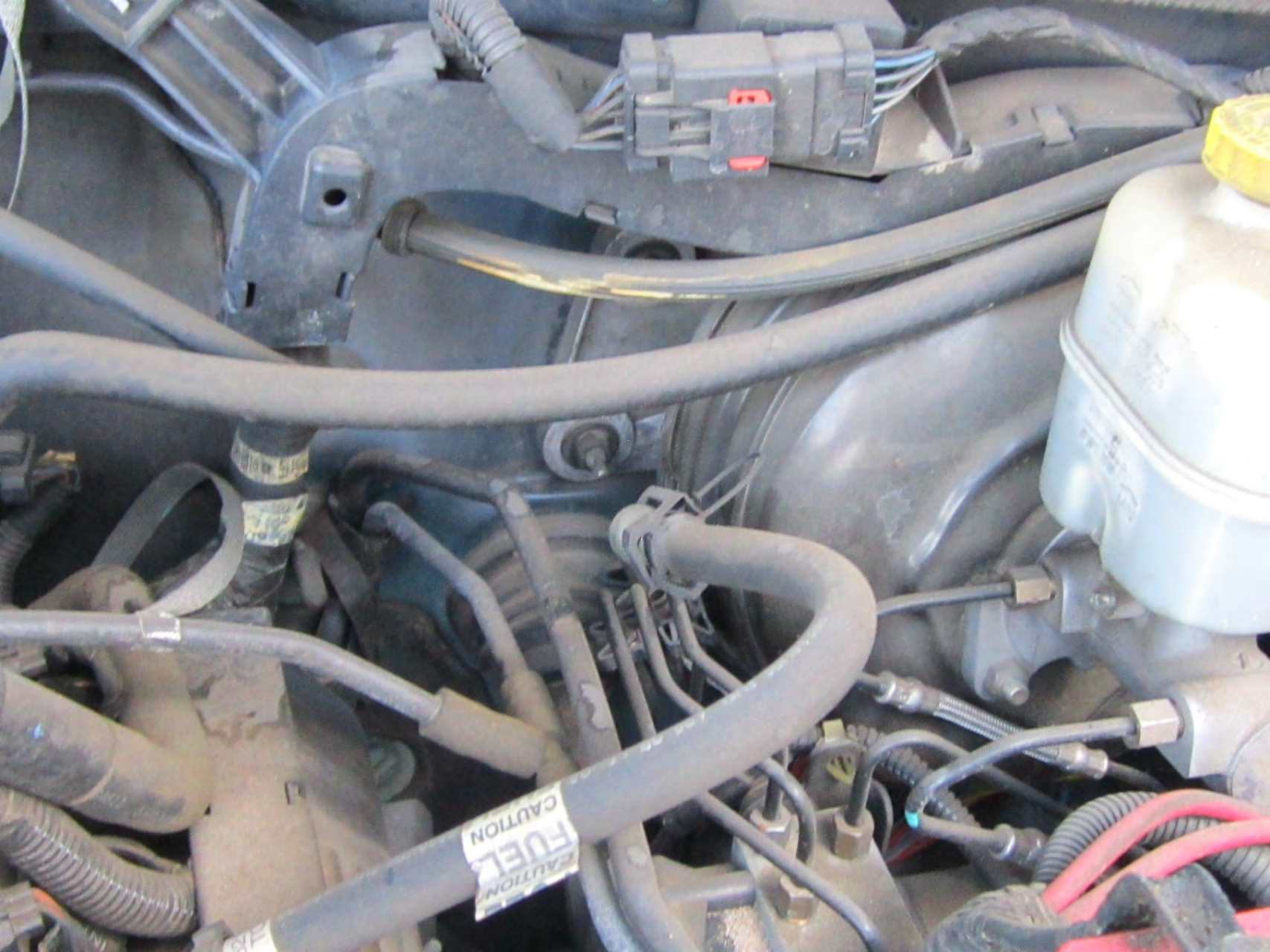
DISTRIBUTED BY BEST PARTS, INC. MEMPHIS, TN 38108

SMOKE

SMOKING

SEVERE WEAR

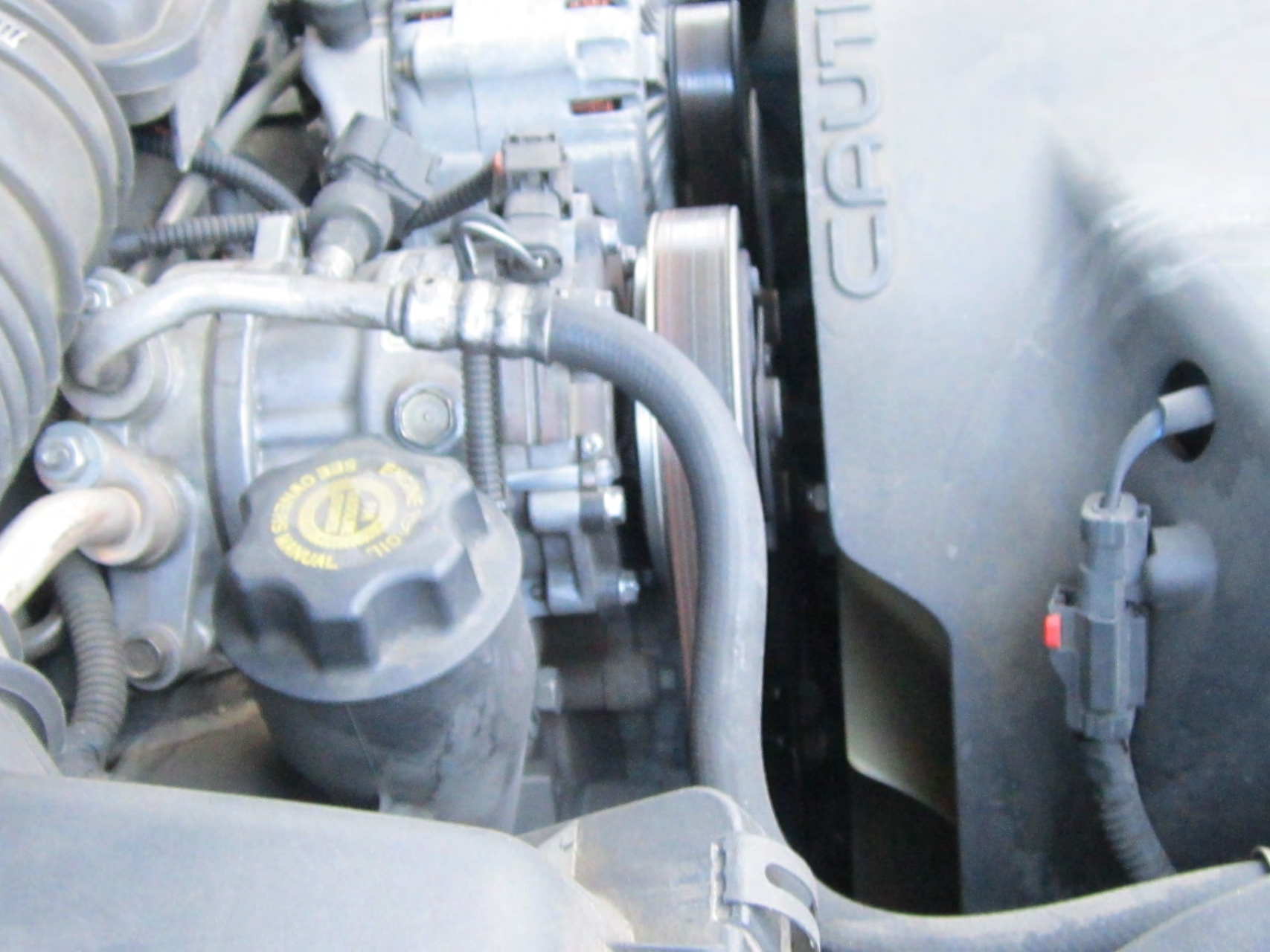
HEAT



















Main Menu

DRB  Standalone

Connect to TechTOOLS

Generic Scan Tool

PEP Module Tools

Run Memory Card Program

DRB Utilities

Vehicle Flash

Legacy MDS1 Support

DRB III CDRB Application

Chrysler Corp.

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RELEASE 64.1 01

Released: 15:51:24 10/11/2006

BIOS Version: 4.02

Database: 3:18:38 7/19/2006

Cable ID: J1962 (CH7000)

DRB III CDRB Application
Chrysler Corp.

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RELEASE 64.1 01

Released: 15:51:24 10/11/200

Bios Version: 4.02

Database: 8:18:38 7/19/200

Cable in use: J1962 (CH7000A)



DRB III CDRB Application

Chrysler Corp.

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RELEASE 64.1 01

Released: 15:51:24 10/11/2007

Bios Version: 4.02

Database: 8:18:38 7/19/2007

Cable in use: J1962 (CH7000A)



64.1



DRB

SELECT RESTRAINT SYSTEM

1. Airbag
2. Side Airbags
3. Airbag On/Off Switch System
4. Occupant Classification Sys

AIRBAG DIAGNOSTICS

Determining Controller
Type

Please Wait...

Unable to ID Module for
ORC

}

press any key to continue

WINDLER

DRBI

--- PCM DTCs ---

NO DTCs DETECTED

Starts Since Clear : 38

Powertrain Control Module Info

2003 KJ 3.7L V6 SFI

Module: Cal 16.0 APR 03

Natural Asp, Unleaded Fuel

Low Emission Vehicle (NBV)

Automatic Trans, RW Drive

Jeep Truck Engine, JTEC+

Single Fan, Variable Speed

PCM Part#: 56044623AE

Homologation ID: FBKABB

CARB OBD II Vehicle

Unable to ID Module for
SRM

press any key to continue

Select Side Airbag

1. Right Side
2. Left Side

-- RSA DTCs --

NO DTCs DETECTED

— RSA DTCs —

NO DTCs DETECTED

Page has to quit

Right Side Airbag Module

Part#: 56009898AC

S/W Ver: 5.41

2001 KJ

TRW SIAM GEN I

Right Side Airbag

Select Side Airbag

1. Right Side
2. Left Side

LSA DTCS

NO DTCS

DETECTED

Left Side Airbag Modul

Part#: 56009899AC

S/W Ver: 5.41

2001 KJ

TRW SIAT GEN I

Left Side Airbag

Side Airbag Enabled

SRS
AIRBAG

SRS
AIRBAG











RF

Jeep

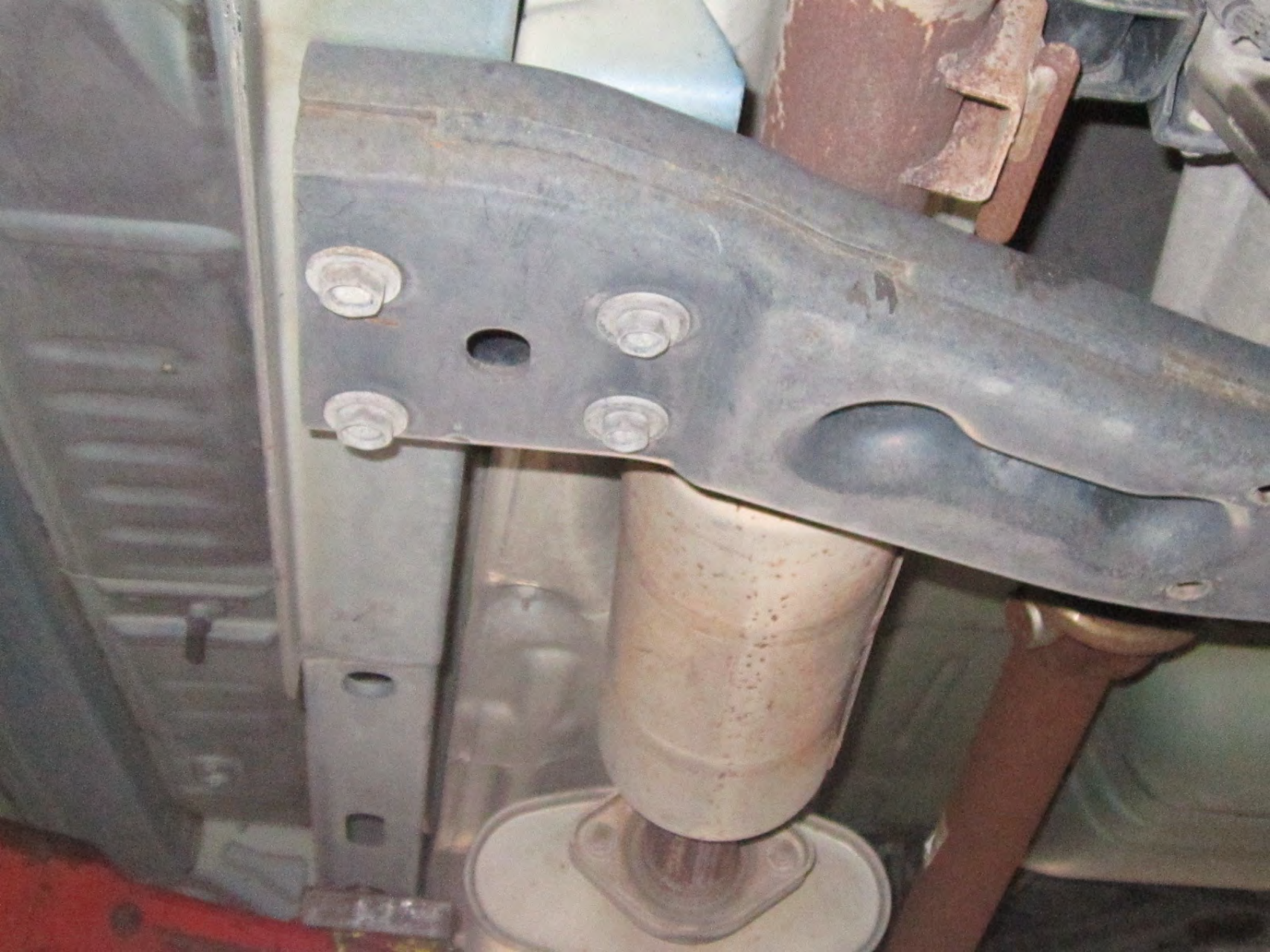
MADE IN CHINA

PROVIDA

FREE















INSTALLATION INSTRUCTIONS
1. Apply film of oil to gasket.
2. Tighten D/S turn after gasket
3. Check for leaks.
4. Check for leaks.

11 CNR230760 140
P52128517AB





LR

Jeet

LB





DOT PJB JYR 1711 65R17



RR



RR

Jeep

RRR







Customer Assistance Inquiry Record (CAIR)#

22241059

Vin	1J8GK58K6 3W	Open Date	05/17/2012	Built Date	08/24/2002
Model Year	2003	Body	KJTP74	JEEP LIBERTY LTD EDITION 4X2 SPORT UTILITY 4-DR	
In Service Dt	09/23/2002	Mileage	115,000	Dealer Zone	63 DALLAS
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	65233	HELPMAN RIVER OAKS CHRYSLER JEEP			
Dealer Address	4807 KIRBY DRIVE				
Dealer City	HOUSTON	Dealer State	TX	Dealer Zip	77098
Owner	[REDACTED]			Contact Type	TELEPHONE
Address	[REDACTED]			Home Phone	[REDACTED]
	HOUSTON TX	[REDACTED]		Country	UNITED STATES

Product - Unknown - Unknown - Accident - Default	Customer states the air bags deployed without warning.
Corporate - Rental Vehicle - Default - Default - Default	
Dealer - By-Pass - Default - Default - Default	
Product - Body / Trim / Paint Finish - Air Bag - Activation - Front Drivers	

Briefly summarize why the customer is contacting Chrysler: Customer states yesterday afternoon while stopped at a red light the air bags deployed without warning. Customer states she had to go to the emergency room and her hand were on the steering wheel at the time and they are all bruised up and swollen. Customer states she has 1st degree chemical burns on her hands and arms from the powder of the air bags. Customer states she had to pay to have the vehicle towed to the dealership. Customer requests a rental vehicle. Customer states the dealership advised her to contact Chrysler before they would touch the vehicle.

Briefly summarize what the customer is expecting: Customer expecting to notify Chrysler that her air bags deployed without warning.

1. Who is calling and what is their contact information? [REDACTED] owner of the vehicle

Preferred: [REDACTED]
Alternate: [REDACTED]

2. What happened? Customer states yesterday afternoon while stopped at a red light the air bags deployed without warning.

3. What is the current location of the vehicle? Vehicle is currently at the dealership 65233.

Helman River Oaks Chrysler Jeep, 4807 KIRBY DRIVE, HOUSTON, TX, 77098 509, phone number 713-524-3801.

Customer advised a call back is required and will take place within two to five business days.

Preferred Morning/Midday call back number is 832-892-6255

Preferred Afternoon/Evening call back number is 832-892-6255

Customer email address for case updates:lesley_fagg@hotmail.com

Who has possession of the vehicle? Dealership

Has the vehicle been diagnosed by a CDJ dealer? Yes
If a CDJ dealer has diagnosed, what is the dealer name or code? 65233
Reassigned to 88S
Writer sending case to 82S for further review. Please allow 2-5 business
days for contact.

05.21.12

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

VEHICLE LOCATED AT:

HELFMAN RIVER OAKS CHRYSLER JEEP

4807 KIRBY DRIVE

HOUSTON TX 77098

713-524-3801

>> I called Service and spoke to Brian and auth d a rental for 15 days

he will call customer

>> DID SURVEY / EMAILED

Per OGC Matrix, reassigned to 82T. MG17

5/22/12 ASSIGNED TO LSE6. PAG

CAIR NUMBER 22241059 REQUEST EAA INSPECTION 05-22-2012 10:03

CAIR NUMBER 22241059 E-MAIL SENT TO EAA 05-22-2012 10:03

CCRG Open Date: 05/21/2012 14:21:20

Letter Sent: Acknowledgement 05/23/2012 12:21:17

PHOTOGRAPHIC IMAGES POSTED TO THIS CAIR ON 05/29/12 AT 04:17:51 22241059
