























Service of Process **Transmittal**

09/05/2013

CT Log Number 523445911

TO: Melissa Gravlin

Chrysler Group LLC

Office Of General Counsel, 1000 Chrysler Drive

CIMS: 485-13-62

Auburn Hills, MI 48326-2766

RE: Process Served in Oklahoma

Chrysler Group LLC (Domestic State: DE) FOR:

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

TITLE OF ACTION: Pltf. vs. Chrysler Group, LLC,, Dft.

Name discrepancy noted.

DOCUMENT(S) SERVED Summons, Original Petition

COURT/AGENCY: Tulsa County District Court, OK

Case #

NATURE OF ACTION: Product Liability Litigation - Manufacturing Defect - Personal Injury - Defective 2006

Jeep Grand Cherokee, VIN#1J4HS58N66C

ON WHOM PROCESS WAS SERVED: The Corporation Company, Oklahoma City, OK

DATE AND HOUR OF SERVICE: By Certified Mail on 09/05/2013 postmarked on 09/03/2013

JURISDICTION SERVED: Oklahoma

APPEARANCE OR ANSWER DUE: Within 20 days after service of this summons upon you, exclusive of the day of

Guy A. Thiessen ATTORNEY(S) / SENDER(S):

Carr & Carr Attorneys 4416 South Harvard Avenue

Tulsa, OK 74135 918-747-1000

CT has retained the current log, Retain Date: 09/05/2013, Expected Purge Date: 09/10/2013 ACTION ITEMS:

Image SOP

The Corporation Company Amy McLaren SIGNED:

PER:

ADDRESS: 1833 South Morgan Road Oklahoma City, OK 73128

TELEPHONE: 800-592-9023



ATTORNEYS AT LAW 4416 S. HARVARD AVENUE TULSA, OK 74135-2605



7013 0600 0002 4096 4442



CHRYSLER GROUP, LLC
THE CORPORATION COMPANY
1833 S MORGAN RD
OKLAHOMA CITY OK 73128



IN THE DISTRICT COURT OF TULSA COUNTY STATE OF OKLAHOMA

Plaintiff,	ω ω ω ω ω ω ω ω	
VS.	8	CJ NO 2013-04024
CHRYSLER GROUP, LLC.,	& &	
Defendant.	8	
SUM	MON	<u> 1 S</u>
To the above-named Defendant:		
CHRYSLER GROUP, LLC		
written answer to the attached petition in the days after service of this summons upon you same time, a copy of your answer must be plaintiff.	e court ou, exc be deliv in the	clusive of the day of service. Within the vered or mailed to the attorney for the time stated, judgment will be rendered
Attorney for Plaintiff: GUY A. THIESSEN OBA #13170	y Cour	TOTAL COURT CLERK
This summons was served on		
YOU MAY SEEK THE ADVICE OF AN AT WITH THIS SUIT OR YOUR ANSWER. SU IMMEDIATELY SO THAT AN ANSWER I	ICH AT	ITORNEY SHOULD BE CONSULTED

STATED IN THE SUMMONS.

Plaintiff.

VS.

CHRYSLER GROUP, LLC.,

Defendant.

BALLY HOWE SMITTI COURT CLERT!

CJ_{ASE}2013-04024

Attorney Lien ClageFFERSON D. SELLERS

ORIGINAL PETITION

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COMES NOW, the Plaintiff and and respectfully makes and files this Original Petition against CHRYSLER GROUP, LLC., (hereinafter referred to as "Defendant"), and for her causes of action state and show the following:

I. Parties

- Plaintiff resides in the State of Oklahoma and is a resident of the City of Broken Arrow.
- 2. Defendant Chrysler Group LLC is a foreign Corporation doing business in Texas and service of process upon this Defendant may be had by serving its registered agent for service, CT Corporation System at 350 N. St. Paul Street, Dallas, Texas 75201.

II. Facts

3. On or about April 10, 2013, the Plaintiff was driving a 2006 Jeep Grand Cherokee (VIN#1J4HS58N66C) traveling southbound on S. Riverside Parkway in Tulsa, Oklahoma and lost control of the vehicle and left the roadway when the front wheel drive literally separated from the vehicle.

- 4. At the time of the accident, the Plaintiff was properly wearing her 3-point seat belt.
- 5. Despite being properly restrained, the Plaintiff was seriously injured when her vehicle failed to protect her.

III. Cause(s) of Action As To Defendant

- 6. It was entirely foreseeable to and well-known by the Defendant that accidents and incidents involving its vehicles, such as occurred herein, would on occasion take place during the normal and ordinary use of said vehicle.
- 7. The injuries occurred because the vehicle in question was not reasonably crashworthy, and was not reasonably fit for unintended, but clearly foreseeable, accidents. The vehicle in question was unreasonably dangerous in the event it should be involved in an incident like occurred herein.
- 8. Defendant designed, manufactured, marketed, assembled, and/or tested said vehicle in question to be unreasonably dangerous and defective within the meaning of Section 402(A) Restatement (Second) Torts in that the vehicle was unreasonably dangerous as designed, manufactured, assembled, marketed, and/or tested because Defendant knew of the following defects:
 - A. the vehicle failed to maintain body and driveline integrity when the front wheel drive literally separated from the vehicle and the vehicle rolled over it;
 - B. the vehicle's structural integrity failed to keep the driveline in place;
 - C. the vehicle's front driveline violated principles of crashworthiness.
- 9. The foregoing acts and/or omissions of Defendant were a producing and/or proximate cause of the Plaintiff's damages.

10. The foregoing acts and/or omissions of Defendant were a producing and/or proximate cause of Plaintiff's serious injuries.

V. Damages to Plaintiff

- 11. As a result of the acts and/or omissions of Defendant, Plaintiff has endured pain and suffering, extreme emotional distress, mental anguish, impairment, disfigurement, interference with her daily activities, and a reduced capacity to enjoy life in the past and, in all likelihood, will into the future as a result of her injuries.
- 12. As a result of the acts and/or omissions of Defendant, Plaintiff has become obligated to pay reasonable or reimburse necessary medical expenses incurred in the past and, in all likelihood, will into the future as a result of her injuries.
- 13. The above and foregoing acts and/or omissions of Defendant, resulting in the injuries and damages complained of herein, have caused actual damages to Plaintiff in an amount in excess of \$10,000.

WHEREFORE, for the reasons presented herein, Plaintiff prays that judgment be rendered in favor of the Plaintiff and against the Defendant along with interest, costs, and any other relief this Court deems just and proper.

Respectfully submitted,

CARR & CARR APTORNEYS

Guv A. Thiessen, OBA #13170

Patrick E. Carr, OBA # 1506

A. Laurie Koller, OBA #16857

4416 South Harvard Avenue

Tulsa, OK 74135

(918) 747-1000

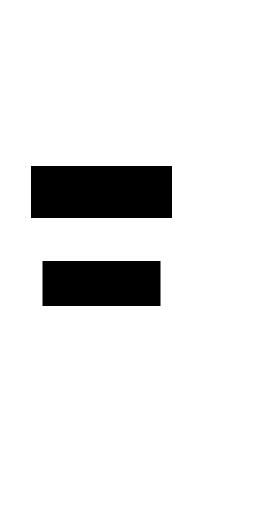
(918) 747-7284 Fax

AND

The TRACY firm

E. Todd Tracy
Texas State Bar No. 20178650
etoddtracy@vehiclesafetyfirm.com
5473 Blair Road, Suite 200
Dallas, Texas 75231
(214) 324-9000 Phone
(972) 387-2205 Fax

ATTORNEYS FOR PLAINTIFFS



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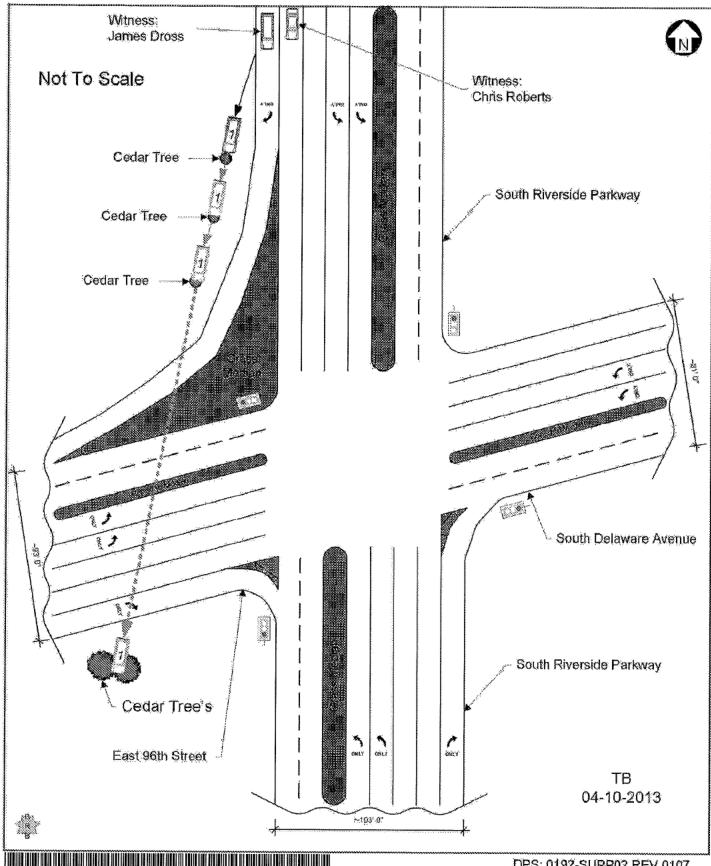
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OFFICIAL OKLAHOMA TRAFFIC COLLISION REPORT DIAGRAM SUPPLEMENTAL

Case Number

Pg 5 of6



DPS: 0192-SUPP02 REV 0107 PE14-017 - Chrysler - 03928 OFFICIAL OKLAHOMA TRAFFIC COLLISION REPORT

Pg 6 of 6

ADDITIONAL NARRATIVE Case Numb Officer's Narrative: On 04-10-2013, at ~1058 hours, I was radio assigned to 9600 S. Riverside Parkway in reference to a traffic collision with injuries. Upon arrival, it was determined that unit 1 was traveling southbound on S. Riverside Parkway. As unit 1 approached E. 96th Street, it departed the roadway to the right. Unit 1 then collided with three tree's before crossing E. 96th Street and colliding with several large Cedar trees. Driver's Statement: was identified as the driver of unit 1. could not recall the accident. She was not aware of where she was and could not advise where she was coming from. Witnesses: was traveling southbound on S. Riverside Parkway in the outside lane. He advised he was directly witnessed the collision behind unit 1. idvised that as unit 1 was approaching E. 96th Street, it entered the right hand only turn lane. Unit 1 then departed the roadway to the right and struck several tree's. Unit 1 then crossed E, 96th Street and collided with several large tree's before coming to rest. itnessed the collision. As he was traveling southbound on S. Riverside Parkway in the inside lane. As he was approaching E. 96th Street, he observed unit 1 depart the roadway to the right. Unit 1 then collided with several tree's before crossing E. 96th Street and collided with several large tree's. Officer's Investigation: It appeared that had a medical problem which caused her to depart the roadway. did advise she had taken her medication (Tramadol 50MG) at around 0630 hours on this date. She advised the medication is for pain which is the result of a recent knee surgery. Property Damage: Several tree's were damaged when they were struck by unit 1. The tree's are owned by the City of Tulsa. Area Of Impact: Unit 1 departed the roadway ~343 ft. N. of the S. E/R of E. 96th Street and the west edge of S. Riverside Parkway. AOI #1 (Unit 1 & tree): -256 ft. N. of the S. E/R of E. 96th Street and -45 ft. W. of the W. E/R of S. Riverside Parkway. AOI #2 / POR (Unit 1 and tree's: ~32 ft. S. of the S. E/R of E. 96th Street and ~116 ft. W. of the W. E/R of S. Riverside Parkway. Injuries: advised she was hurting all over. She had a small laceration above her left eye and it appeared that her left ankle was possibly fractured. She was transported to St. Francis Hospital via EMSA. Report submitted by: ATI Officer T. Barbee #1778 Tulsa Police Department

Riverside Division Traffic Unit

LERTIFIED LOPY
Authority 0.5, 2001, Tit. 47, Sec. 6, 317

Dated this doy of Jensey 3

E DEPARTMENT OF PUBLIC SAFETE,
STATE OF OKLAHOMA