

MATTER # 1241683
FILE TYPE Claim
FILE NAME [REDACTED]
CAIR # 23819156
DATE OF INCIDENT 07/12/2013
DATE OF NOTICE 08/14/2013
MODEL/MODEL YEAR 2005 Jeep Grand Cherokee Laredo 4x2
VIN 1J4GS48K65C [REDACTED]
MILEAGE 97,000
OWNER [REDACTED]
Jackson, MS [REDACTED]
COURT NA
DOCKET # NA
ALLEGED DEFECT Air Bag Non-deployment
DESCRIPTION On July 12, 2013, at approximately 9:58 p.m., [REDACTED] (age 56), ("Claimant") was driving her husband's 2005 Jeep Grand Cherokee southbound on Ridgewood Road, which is a four lane city street in Jackson, Mississippi. The posted speed limit on this road is 35 mph. When she was approximately 340' south of her residence, [REDACTED] alleges another southbound vehicle cut over on her causing the Jeep Grand Cherokee to leave the road to the west and strike a utility pole almost head on 7'9" from the pavement. The speed of the Jeep Grand Cherokee is alleged to have been 15-25 mph. [REDACTED] struck and deformed the steering wheel and her head struck and broke the windshield. She was not belted. When [REDACTED] husband called Chrysler Group to report this accident, he stated his wife was just about to put her seat belt on when the accident happened. Claimant alleges the driver's air bag failed to deploy during a head on collision with a utility pole at a speed estimated by Claimant to be 25 mph. At the insistence of first responders, [REDACTED] was transported to the hospital where she was treated and released after three days.
INJURIES 1
FATALITIES 0
ANALYSIS Based upon the available information and [REDACTED] own statement to her husband, the loss of control of the vehicle was not due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. [REDACTED] did not report a stalling event or difficulty in braking or steering. Rather, she reported having to make an evasive maneuver to avoid an encroaching vehicle which then

caused her vehicle to leave the roadway and strike a pole. This statement is corroborated by the vehicle's Occupant Restraint Control (ORC) data. The Airbag ECU Data Reader Report, which is included in this submission, clearly indicates that the ORC monitored ignition switch voltage at the time of impact with the pole and recorded certain fault codes. Setting fault codes in the ORC requires that the ignition switch be powered and in the "On" position. This conclusively proves there was still power to the ignition switch at the time of Ms. [REDACTED] impact with the pole and that the ignition switch was in the "On" position.

Moreover, an analysis of the inspection photos¹ reveals that Ms. [REDACTED] vehicle did not experience the necessary rate of longitudinal deceleration to deploy the front airbags.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege. Certain available inspection photos are being produced in this submission, which are labelled in a folder by the claimant's name number.

MATTER # 1223724
FILE TYPE Claim
FILE NAME ██████████
CAIR # 21152044
DATE OF INCIDENT 05/20/2011
DATE OF NOTICE 07/25/2011
MODEL/MODEL YEAR 2005 Jeep Grand Cherokee Laredo 4x4
VIN 1J4GR48K650 ██████████
MILEAGE 76,676
OWNER ██████████
██████████
Loris, SC ██████████
COURT NA
DOCKET # NA
ALLEGED DEFECT Air Bag Non-Deployment
DESCRIPTION On May 20, 2011, ██████████ (age ██████████), was driving her 2005 Jeep Grand Cherokee in the parking lot of a BB&T bank in Loris, South Carolina, when she allegedly "blacked out" and lost control of the vehicle. Per the Police Report, her estimated speed was 35mph. The Grand Cherokee moved through the bank's parking lot and struck a parked vehicle, moving it out of its parking space. The vehicle then traveled diagonally through an intersection into the parking lot of a Subway restaurant where it struck a second parked vehicle in the Subway parking lot and continued traveling until striking the glass doors of the Subway restaurant, coming to a stop. ██████████ was reportedly injured and transported to the hospital for medical care.
INJURIES 1
FATALITIES 0
ANALYSIS Based upon the available information and the driver's own statements, loss of control of the vehicle was not due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Moreover, an analysis of the inspection photos¹ of the vehicle damage revealed that the impact did not produce the longitudinal deceleration necessary at impact to deploy the frontal air bags.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege. The available inspection photos are being produced in this submission, which are labelled in a folder by the CAIR number.

MATTER # 1217754
FILE TYPE Case
FILE NAME [REDACTED]
CAIR # 18224986
DATE OF INCIDENT 01/02/2009
DATE OF NOTICE 01/06/2009
MODEL/MODEL YEAR 2007 Jeep Commander Sport 4x4
VIN 1J8HG48K270 [REDACTED]
MILEAGE 35,759
OWNER [REDACTED]
South Lyon, MI [REDACTED]

COURT Circuit Court, Wayne County, MI
DOCKET # 10006507NO
ALLEGED DEFECT Sudden Acceleration; Air Bag Non-Deployment
DESCRIPTION On January 2, 2009, at 5:15 a.m. [REDACTED] (age 32), was driving his 2007 Jeep Commander northbound on Pontiac Trail Road in Lyon Township, Michigan. It was dark and the road was dry. According to Plaintiff, the vehicle first began to stall and then suddenly accelerated, causing Plaintiff to lose control of the vehicle, striking a boulder and a tree and landing in a ditch. The police report states that Plaintiff was wearing his lap and shoulder belt and that the airbags did not deploy. The police report does not contain any information regarding the cause of the accident or whether Plaintiff was at fault. The "vehicle defect" section of the report is coded as a 6, which means "other." Plaintiff called 911 immediately following the accident. During the 911 call, Plaintiff stated that the vehicle "shut down" and then the "RPMs kicked in," causing him to lose control of the vehicle.

INJURIES 1
FATALITIES 0
ANALYSIS Based upon the available information and the driver's own statements, loss of control of the vehicle was due to an acceleration issue and not to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Moreover, an analysis of the inspection photos¹

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of the vehicle damage revealed that the impact did not produce the longitudinal deceleration necessary to deploy the frontal air bags.

MATTER # 1238687
FILE TYPE Case
FILE NAME [REDACTED]
CAIR # 23322743
DATE OF INCIDENT 04/10/2013
DATE OF NOTICE 04/15/2013
MODEL/MODEL YEAR 2006 Jeep Grand Cherokee Limited 4x2
VIN 1J4HS58N660 [REDACTED]
MILEAGE 83,394
OWNER [REDACTED]
[REDACTED]
Broken Arrow, OK [REDACTED]
COURT District Court, Tulsa, OK
DOCKET # CJ201304024
ALLEGED DEFECT Air bag Non-Deployment
DESCRIPTION On April 10, 2013 at 10:57 p.m., [REDACTED] (age 31) was driving a 2006 Jeep Grand Cherokee on South Riverside Parkway in Tulsa, Oklahoma, when her vehicle veered off the roadway to the right, struck three trees, traversed East 96th Street, and came to rest after striking a group of trees. [REDACTED] alleges the "front wheel drive literally separated from the vehicle." [REDACTED] told the police that she has recently had knee surgery and had taken pain medication (Tramadol) at about 6:30 p.m. She had no recall of the accident and could not tell the police officer where she was or where she had come from. She was transported to the hospital by ambulance. Injuries; lower back compression fracture, fractured ankle, concussion. Ms. [REDACTED] complaint alleges 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; vehicle's structural integrity failed to keep the driveline in place; vehicle's front driveline violated principles of crashworthiness.
INJURIES 1
FATALITIES 0
ANALYSIS Based upon the available information and the driver's own statements, loss of control of the vehicle was not due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Moreover,

an analysis of the inspection photos¹ of the vehicle damage revealed that the impact did not produce the longitudinal deceleration necessary to deploy the frontal air bags.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege. The available inspection photos are being produced in this submission, which are labelled in a folder by the CAIR number.

MATTER # 1164204
FILE TYPE Claim
FILE NAME [REDACTED]
CAIR # 14430589
DATE OF INCIDENT 12/28/2005
DATE OF NOTICE 12/29/2005
MODEL/MODEL YEAR 2006 Jeep Commander Limited 4x4
VIN 1J8HG58246C [REDACTED]
MILEAGE
OWNER [REDACTED]
[REDACTED]
Vinton, VA [REDACTED]
COURT NA
DOCKET # NA
ALLEGED DEFECT Air bag Non-Deployment
DESCRIPTION On November 21, 2005 in Vinton, Virginia (near Roanoke), [REDACTED] was driving her 2006 Jeep Commander at a speed of about 35 m.p.h. when a cat ran out in front of her. She swerved in an attempt to avoid the cat, causing her vehicle to run off the left side of the road and strike a sign in the median. [REDACTED] alleges that the air bag failed to deploy and as a result her chest hit the steering wheel, resulting in four cracked ribs, a bruised sternum and a "slipped" disc in her back. She had back surgery 9 weeks prior to the accident, and alleges that a second surgery was needed due to the accident.
INJURIES 1
FATALITIES 0
ANALYSIS Based upon the available information and the driver's own statements, loss of control of the vehicle was not due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Moreover, an inspection¹ of the vehicle, the impact did not produce the longitudinal deceleration necessary to deploy the frontal air bags.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege. There are no available inspection photos.

MATTER # 1194131
FILE TYPE Case
FILE NAME [REDACTED]
CAIR # None
DATE OF INCIDENT 06/30/2007
DATE OF NOTICE 07/21/2008
MODEL/MODEL YEAR 2007 Jeep Grand Cherokee Laredo 4x4
VIN 1J8GR48K17C [REDACTED]
MILEAGE Unknown
OWNER Alamo Rental
2006 S 146TH ST
Seattle, WA 98168
COURT District Court, Clark, NV
DOCKET # A567358
ALLEGED DEFECT Air bag Non-Deployment
DESCRIPTION On June 30, 2007, [REDACTED] was a front seat passenger in a 2007 Jeep Grand Cherokee Laredo being driven by [REDACTED] in Parker, Arizona. According to the police report the subject vehicle was traveling at a high rate of speed and failed to stop at a posted stop sign, striking a 2007 Ford truck being driven by [REDACTED]. Plaintiffs allege that the front passenger air bag failed to deploy, resulting in injuries to [REDACTED]. Other passengers in the Grand Cherokee included [REDACTED] and [REDACTED]. [REDACTED] died from injuries sustained in the accident. Only [REDACTED] has brought a claim for her injuries.
INJURIES 1
FATALITIES 1
ANALYSIS Chrysler was not provided the opportunity to inspect the vehicle and Plaintiff's dismissed the lawsuit. However, based upon the available information and the driver's own statements, there is no evidence that the loss of control of the vehicle was due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Based on review of police photos ¹ of the vehicle damage, the front driver's side

¹ The available police photos are being produced in this submission, which are contained in a folder labeled by the file name.

air bag deployed, which indicates the ignition switch must have been in the "ON" position at the time of impact.

MATTER # 1231267
FILE TYPE Claim
FILE NAME ██████████
CAIR # 23308160
DATE OF INCIDENT 05/31/2012
DATE OF NOTICE 06/09/2012
MODEL/MODEL YEAR 2005 Jeep Grand Cherokee Limited 4x4
VIN 1J8HR58205C ██████████
MILEAGE 58,211
OWNER ██████████
██████████
Brookfield, WI ██████████
COURT NA
DOCKET # NA
ALLEGED DEFECT Air bag Non-Deployment
DESCRIPTION On May 31, 2012, ██████████ (age 85) was driving a 2005 Jeep Grand Cherokee, and was turning left into the driveway of his home in East Troy Township, Wisconsin, when he accelerated and the Grand Cherokee swerved to the left, traveled down an embankment and struck a 21 inch diameter tree. ██████████ says he was belted. He alleges the front air bags should have deployed .
INJURIES 1
FATALITIES 0
ANALYSIS Based upon the available information and the driver's own statements, loss of control of the vehicle was not due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Moreover, an analysis of the inspection photos¹ of the vehicle damage revealed that the impact did not produce the longitudinal deceleration necessary to deploy the frontal air bags.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege. The available inspection photos are being produced in this submission, which are labelled in a folder by the CAIR number.

MATTER # 1230465
FILE TYPE Case
FILE NAME [REDACTED]
CAIR # 21418438
DATE OF INCIDENT 10/15/2010
DATE OF NOTICE 10/03/2011
MODEL/MODEL YEAR 2007 Jeep Commander Limited 4x4
VIN 1J8HG58237C [REDACTED]
MILEAGE [REDACTED]
OWNER [REDACTED]
Spencer, IN [REDACTED]
COURT Circuit Court, Marion, IN
DOCKET # [REDACTED]
ALLEGED DEFECT Air bag Non-Deployment
DESCRIPTION On October 15, 2010, [REDACTED] (age [REDACTED]) was driving his 2007 Jeep Commander on a highway in Spencer, Indiana, when he sideswiped a 2008 Chevy pickup truck driven by [REDACTED] f. The Chevy was towing a trailer holding a large piece of ditch digging machinery, and had pulled off to the side of the road with its warning lights activated. The Commander first impacted the trailer and became airborne before hitting the front of the Chevy truck and overturning several times. Restraints used. [REDACTED]' estate alleges the front and side curtain airbags failed to deploy in a "must fire" accident sequence. Prior to this crash, [REDACTED] was experiencing a medical emergency and was attempting to drive himself to the hospital. The police accident report notes that the coroner later notified the police that [REDACTED] had died during surgery. The coroner stated that [REDACTED] suffered an abdominal aneurysm, which likely caused this crash.
INJURIES 0
FATALITIES 1
ANALYSIS Based upon the available information and the driver's own statements, loss of control of the vehicle was not due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Moreover, an analysis of the inspection photos¹ of the vehicle damage revealed

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege. The available inspection police and photos are being produced in this submission, which are contained in a folder labelled by the File Name.

that the impact did not produce the longitudinal deceleration necessary to deploy the frontal air bags.

MATTER # 1168320
FILE TYPE Claim
FILE NAME [REDACTED]
CAIR # 14866814
DATE OF INCIDENT 04/17/2006
DATE OF NOTICE 05/02/2006
MODEL/MODEL YEAR 2005 Jeep Grand Cherokee Laredo 4x2
VIN 1J8HS48N450 [REDACTED]
MILEAGE
OWNER [REDACTED]
Douglas, AZ [REDACTED]
COURT NA
DOCKET # NA
ALLEGED DEFECT Air bag Non-Deployment
DESCRIPTION The accident occurred on April 17, 2006, at 4:30 pm on the highway between Caborca and Puerta Penasco, Mexico. [REDACTED], stated she encountered some loose gravel on the pavement that caused her to lose control of the 2005 Jeep Grand Cherokee, resulting in a one-vehicle rollover. The scene "diagram" indicates that Ms. [REDACTED] was passing another vehicle in the opposite travel lane when she lost control of the vehicle. There were two (2) passengers in the vehicle.
INJURIES 1
FATALITIES 0
ANALYSIS Based upon the available information and the driver's own statements, loss of control of the vehicle was not due to an inadvertent movement of the ignition switch from the "On" to "Accessory" position. Moreover, an analysis of the inspection photos¹ of the vehicle damage revealed that the impact did not produce the longitudinal deceleration necessary to deploy the frontal air bags.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege. The available inspection photos are being produced in this submission, which are contained in a folder labelled by the File Name.