

BARRY GREEN

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February 28, 2017

Ford Motor Company
c/o Corporation Process Company
205 East Bender, Suite 150
Hobbs, New Mexico 88240

RE: [REDACTED] v. Ford Motor Company, et. al.
[REDACTED]

Dear Sirs:

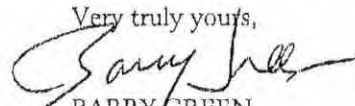
The Morris Law Firm and I represent [REDACTED] and [REDACTED] with regard to the above-referenced case. Because we represent Mr. and Mrs. [REDACTED] we cannot give you any legal advice. However, if you would like to discuss anything about this case, please feel free to call me.

I have enclosed the following documents to be served upon Defendant, Ford Motor Company:

1. One (1) Complaint for Violations of the Motor Vehicle Quality Assurance Act and Unfair Practices Act;
2. One (1) original Summons;
3. One (1) Request for Production to Defendant, Ford Motor Company;
4. One (1) Request for Admissions to Defendant, Ford Motor Company;
5. Two (2) Interrogatories and Second Request for Production to Defendant, Ford Motor Company;
6. A Certificate of Service of Discovery on Defendant Richardson Ford Sales, Inc.;
7. A Certificate of Service of Discovery on Defendant Ford Motor Company; and
8. A Certificate of Service of Discovery on Defendant Ford Motor Credit Company, LLC.

Many of these documents contain specific deadlines for Defendant, Ford Motor Company's response. Please make sure that Defendant, Ford Motor Company, does not miss these deadlines or legal consequences may result, including a Judgment by Default entered against Defendant, Ford Motor Company.

Thank you.

Very truly yours,

BARRY GREEN

Enclosures

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

[REDACTED]
Plaintiffs,

vs.

No. [REDACTED]

Richardson Ford Sales, Inc., Ford
Motor Company, and Ford Motor
Credit Company LLC,

Defendants.

**COMPLAINT FOR VIOLATIONS OF THE MOTOR VEHICLE QUALITY
ASSURANCE ACT AND UNFAIR PRACTICES ACT**

COME NOW the Plaintiffs, [REDACTED] and [REDACTED] by and through their attorneys, the
Morris Law Firm, by Deborah Moore, Esq., and the Law Office of Barry Green, by Barry Green,
Esq., and for their Complaint against the Defendants, Richardson Ford Sales, Inc., Ford Motor
Company, and Ford Motor Credit Company LLC, allege as follows:

PARTIES

1. Plaintiffs, [REDACTED] and [REDACTED] are residents of Bernalillo County, State of New Mexico, and have been at all times relevant hereto.
2. Defendant, Richardson Ford Sales, Inc. (hereinafter "Defendant Rich Ford"), is a New Mexico Corporation whose principal place of business is in the County of Bernalillo, State of New Mexico.
3. Defendant, Ford Motor Company (hereinafter "Defendant Ford"), is a foreign corporation licensed to do business in the State of New Mexico.

4. Defendant, Ford Motor Credit Company, LLC (hereinafter "Defendant Ford Credit"), is a foreign corporation licensed to do business in the State of New Mexico.

JURISDICTION AND VENUE

5. All events material to this action occurred in Albuquerque, New Mexico.

6. Jurisdiction and venue are proper in the District Court of Bernalillo County, New Mexico.

MATERIAL FACTS AND ALLEGATIONS

7. On or about August 20, 2015, Mr. and Mrs. [REDACTED] contracted with Defendant Rich Ford to purchase a new 2015 Ford Explorer (hereinafter "Explorer") (Exhibit 1 attached hereto).

8. Defendant Rich Ford arranged the financing for Mr. and Mrs. [REDACTED] to purchase the Explorer through Defendant Ford Credit.

9. The Explorer, VIN #1FM5K8F89F[REDACTED], was delivered to Mr. and Mrs. [REDACTED] on August 20, 2015. The Explorer had been driven 1,089 miles prior to delivery.

10. Mr. and Mrs. [REDACTED] began experiencing problems with the Explorer on or about August 24, 2015. Those problems included but were not limited to: a squeaking noise moving the moon roof; the key would not program; an exhaust smell in the passenger compartment of the Explorer; a front end noise while turning; and a groaning sound from the steering wheel. Defendant Rich Ford has had the Explorer in its shop for more than thirty business days attempting to repair the exhaust smell inside the Explorer but has been unsuccessful.

11. Defendant Ford was informed of the above listed problems by Defendant Rich Ford in August, 2016. Defendant Ford became involved in the repair attempts.

12. When neither Defendant Rich Ford or Defendant Ford could repair the Explorer, Mr. and Mrs. Hopper requested a refund of their purchase price pursuant to NMSA 1978, §57-16A-3(B) (1985).

COUNT I
BREACH OF MOTOR VEHICLE QUALITY ASSURANCE ACT

13. Mr. and Mrs. [REDACTED] incorporate and re-allege all of the allegations contained in the preceding paragraphs of this Complaint, as if they had been fully set forth in this Count I, and further allege:

14. Mr. and Mrs. [REDACTED] are consumers pursuant to the Motor Vehicle Quality Assurance Act, NMSA 1978, §57-16A-2(C) (2003).

15. The Explorer is a motor vehicle pursuant to the Motor Vehicle Quality Assurance Act, NMSA 1978, §57-16A-2(F) (2003).

16. Defendant Ford is a manufacturer pursuant to the Motor Vehicle Quality Assurance Act, NMSA 1978, §57-16A-2(E) (2003).

17. Defendants Rich Ford and Ford have been unable to repair the Explorer to prevent the exhaust smell in the passenger compartment of the Explorer despite the Explorer being in the possession of Defendant Rich Ford for more than thirty (30) business days.

18. The exhaust smell in the passenger compartment of the Explorer substantially impairs the use and market value of the Explorer to Mr. and Mrs. [REDACTED]. Mr. and Mrs. [REDACTED] are therefore entitled to return the Explorer to Defendants Rich Ford and Ford for a full refund of the purchase price including all collateral charges, less a reasonable allowance for their use of the vehicle.

19. As a direct and proximate result of all Defendants breach of the Motor Vehicle Quality Assurance Act, Mr. and Mrs. [REDACTED] have suffered monetary loss, have lost the use of the Explorer, have had their lives' disrupted and have been forced to seek the services of an attorney to redress the wrongs committed against them.

20. Defendant Ford Credit is not a holder in due course and Mr. and Mrs. [REDACTED] therefore assert their claims for Violations of the Motor Vehicle Quality Assurance Act against Defendant Ford Credit.

21. Defendants Rich Ford, Ford and Ford Credit sold the 2015 Ford Explorer to Mr. and Mrs. [REDACTED] knowing that Ford Explorers as far back as the 2011 Ford Explorers, were experiencing exhaust in the passenger compartment and knowing that they were not able to cure that defect.

22. Mr. and Mrs. [REDACTED] further allege that all Defendants actions were willful, wanton, malicious, reckless, oppressive, grossly negligent, fraudulent, in bad faith and done with an utter disregard for Mr. and Mrs. [REDACTED] rights.

WHEREFORE, Plaintiffs, [REDACTED] and [REDACTED] pray for damages against Defendants as follows:

- a. return of the Explorer to Defendants Rich Ford and Ford;
- b. for compensatory damages;
- c. for punitive damages;
- d. for statutory damages;
- e. for costs and attorney's fees incurred herein;
- f. for pre and post judgment interest; and,

g. for such other and further relief at law and in equity as the Court may deem just and proper.

**COUNT II
UNFAIR PRACTICES**

23. Mr. and Mrs. [REDACTED] incorporate and re-allege all of the allegations contained in the preceding paragraphs of this Complaint, as if they had been fully set forth in this Count II, and further allege:

24. Mr. and Mrs. [REDACTED] are persons pursuant to New Mexico's Unfair Practices Act, NMSA 1978, §57-12-2(A) (2009).

25. Defendant Rich Ford knowingly represented to Mr. and Mrs. [REDACTED] that the Explorer was a new motor vehicle. Defendant Rich Ford did not inform Mr. and Mrs. [REDACTED] that the Explorer had been driven to Colorado prior to the sale to Mr. and Mrs. [REDACTED]. Instead, Defendant Rich Ford informed Mr. and Mrs. [REDACTED] that the mileage on the Explorer was due to the Explorer being driven on round trips to Edgewood, New Mexico.

26. Defendant Rich Ford expected Mr. and Mrs. [REDACTED] to rely on its representations when making their decision to purchase the Explorer.

27. Mr. and Mrs. [REDACTED] did rely on the representations made by Defendant Rich Ford when they purchased the Explorer.

28. At the time the representations were made Defendant Rich Ford knew that the representations were false.

29. Defendant Rich Ford therefore took advantage of Mr. and Mrs. [REDACTED] lack of knowledge, ability, experience or capacity to a grossly unfair degree.

30. Defendant Rich Ford's acts or omissions therefore resulted in a gross disparity between the value Mr. and Mrs. [REDACTED] received and the price Mr. and Mrs. [REDACTED] paid.

31. Defendant Rich Ford is liable to Mr. and Mrs. [REDACTED] for treble actual damages for their misrepresentations.

32. Defendant Ford Credit is not a holder in due course and Mr. and Mrs. [REDACTED] therefore assert their claims for Violations of the Unfair Practices Act against Defendant Ford Credit.

33. As a direct and proximate result of the misrepresentations made by Defendant Rich Ford, Mr. and Mrs. [REDACTED] have suffered have suffered monetary loss, have lost the use of the Explorer, have had their lives' disrupted and have been forced to seek the services of an attorney to redress the wrongs committed against them.

WHEREFORE, Mr. and Mrs. [REDACTED] pray for damages against Defendants Rich Ford and Ford Credit as follows:

- a. For compensatory damages;
- b. For statutory damages;
- c. For treble damages or alternatively, punitive damages;
- d. For early mediation at Defendants' expense pursuant to NMSA 1978, §57-12-10(F) (2005);
- e. For costs and attorney's fees incurred herein;
- f. For pre and post judgment interest; and,
- g. For such other and further relief at law and in equity as the Court may deem just and proper.

Respectfully Submitted,
LAW OFFICE OF BARRY GREEN

By: /s/ Barry Green
Barry Green
Suite 7
200 West DeVargas Street
Santa Fe, New Mexico 87501
505/989-1834 (Phone)
505/982-8141 (Fax)
LawOfficeOfBarryGreen@msn.com (E-Mail)

and

MORRIS LAW FIRM

Deborah Moore
901 Lomas Boulevard, N.W.
Albuquerque, New Mexico 87102
(505) 842-1362 (Phone)
(505) 242-7040 (Fax)
dmoore970@comcast.net (E-Mail)
Attorneys for Plaintiffs

**RETAIL INSTALLMENT SALE CONTRACT - SIMPLE FINANCE CHARGE
(WITH ARBITRATION PROVISION)**

Dealer Number _____ Contract Number _____

Buyer Name and Address (Including County and Zip Code)	Co-Buyer Name and Address (Including County and Zip Code)	Seller-Creditor (Name and Address)
[REDACTED]	[REDACTED]	[REDACTED]

You, the Buyer (and Co-Buyer, if any), may buy the vehicle below for cash or on credit. By signing this contract, you choose to buy the vehicle on credit under the agreements on the front and back of this contract. You agree to pay the Seller - Creditor (sometimes "we" or "us" in this contract) the Amount Financed and Finance Charge in U.S. funds according to the payment schedule below. We will figure your finance charge on a daily basis. The Truth-In-Lending Disclosures below are part of this contract.

New/Used/Demo	Year	Make and Model	Vehicle Identification Number	Primary Use For Which Purchased
NEW	2011	BUICK ENCLAVE	[REDACTED]	Personal, family, or household unless otherwise indicated below <input type="checkbox"/> business <input type="checkbox"/> agricultural

FEDERAL TRUTH-IN-LENDING DISCLOSURES				
ANNUAL PERCENTAGE RATE <small>The cost of your credit as a yearly rate.</small>	FINANCE CHARGE <small>The dollar amount the credit will cost you.</small>	Amount Financed <small>The amount of credit provided to you or on your behalf.</small>	Total of Payments <small>The amount you will have paid after you have made all payments as scheduled.</small>	Total Sale Price <small>The total cost of your purchase on credit, including your down payment of</small>
12.99%	\$ 1,500.00	\$ 12,500.00	\$ 14,000.00	\$ 12,500.00

Your Payment Schedule Will Be:

Number of Payments	Amount of Payments	When Payments Are Due
36	\$ 388.89	Monthly beginning 1/1/11

Or As Follows:

Late Charge. If payment is not received in full within 10 days after it is due, you will pay a late charge of \$ 15.00 or 5% of the part of the payment that is late, whichever is less.

Prepayment. If you pay off all your debt early, you will not have to pay a penalty.

Security Interest. You are giving a security interest in the vehicle being purchased.

Additional Information: See this contract for more information including information about nonpayment, default, any required repayment in full before the scheduled date and security interest.

ITEMIZATION OF AMOUNT FINANCED

1 Cash Price (including \$ 1,500.00 sales tax)	\$ 14,000.00 (1)
2 Total Downpayment =	
Trade-In	
Gross Trade-In Allowance	\$ 1,500.00
Less Pay Off Made By Seller	\$ 0.00
Equals Net Trade In	\$ 1,500.00
+ Cash	\$ 0.00
+ Other	\$ 0.00
(If total downpayment is negative, enter "0" and see 4i below)	\$ 1,500.00 (2)
3 Unpaid Balance of Cash Price (1 minus 2)	\$ 12,500.00 (3)
4 Other Charges Including Amounts Paid to Others on Your Behalf (Seller may keep part of these amounts):	
A Cost of Optional Credit Insurance Paid to Insurance Company or Companies	
Life	\$ 0.00
Disability	\$ 0.00
B Vendor's Single Interest Insurance Paid to Insurance Company	\$ 0.00

Insurance. You may buy the physical damage insurance this contract requires (see back) from anyone you choose who is acceptable to us. You are not required to buy any other insurance to obtain credit unless the box indicating Vendor's Single Interest Insurance is required is checked below.

If any insurance is checked below, policies or certificates from the named insurance companies will describe the terms and conditions.

Check the insurance you want and sign below:

Optional Credit Insurance

Credit Life; Buyer Co-Buyer Both
 Credit Disability; Buyer Co-Buyer Both

Premium:

Credit Life \$ _____
 Credit Disability \$ _____

Insurance Company Name _____

Home Office Address _____

Credit life insurance and credit disability insurance are not required to obtain credit. Your decision to buy or not buy credit life insurance and credit disability insurance will not be a factor in the credit approval process. They will not be provided unless you sign and agree to pay the extra cost. If you choose this insurance, the cost is shown in Item 4A of the Itemization of Amount Financed. Credit life insurance is based on your original payment schedule. This insurance may not pay all you owe on this contract if you make late payments. Credit disability insurance does not cover any increase in your payment or if the number of payments. Coverage for credit life insurance and credit disability insurance ends on the original due date for the last payment unless a different term for the insurance is shown below.

Other Optional Insurance

 Type of Insurance _____ Term _____

Premium \$ _____

Insurance Company Name _____

Home Office Address _____

Disability	\$	N/A	\$	N/A
B Vendor's Single Interest Insurance				
Paid to Insurance Company	\$	N/A	\$	N/A
C Other Optional Insurance Paid to Insurance Company or Companies	\$	N/A	\$	N/A
D Optional Gap Contract	\$	N/A	\$	N/A
E Official Fees Paid to Government Agencies				
to N/A for N/A	\$	N/A	\$	N/A
to N/A for N/A	\$	N/A	\$	N/A
to N/A for N/A	\$	N/A	\$	N/A
F Government Taxes Not Included in Cash Price	\$	N/A	\$	N/A
G Government License and/or Registration Fees	\$	N/A	\$	N/A
H Government Certificate of Title Fees	\$	N/A	\$	N/A
I Other Charges (Seller must identify who is paid and describe purpose)				
to N/A for Prior Credit or Lease Balance	\$	N/A	\$	N/A
to RICH DON SMITH for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
to N/A for	\$	N/A	\$	N/A
Total Other Charges and Amounts Paid to Others on Your Behalf	\$	N/A	\$	N/A
5 Amount Financed (3 + 4)	\$	48,000.00 (4)	\$	48,000.00 (5)

Insurance Company Name _____
Home Office Address _____
Other optional insurance is not required to obtain credit. Your decision to buy or not buy other optional insurance will not be a factor in the credit approval process. It will not be provided unless you sign and agree to pay the extra cost.
I want the insurance checked above.
X _____
Buyer Signature _____ Date _____
X _____
Co-Buyer Signature _____ Date _____

VENDOR'S SINGLE INTEREST INSURANCE (VSI Insurance); If the preceding box is checked, the Creditor requires VSI insurance for the initial term of the contract to protect the Creditor for loss or damage to the vehicle (collision, fire, theft). VSI insurance is for the Creditor's sole protection. This insurance does not protect your interest in the vehicle. You may choose the insurance company through which the VSI insurance is obtained. If you elect to purchase VSI insurance through the Creditor, the cost of this insurance is \$ _____ and is also shown in Item 4B of the Itemization of Amount Financed. The coverage is for the initial term of the contract.

OPTION: You pay no finance charge if the Amount Financed, Item 5, is paid in full on or before _____ Year _____, SELLER'S INITIALS _____

OPTIONAL GAP CONTRACT. A gap contract (debt cancellation contract) is not required to obtain credit and will not be provided unless you sign below and agree to pay the extra charge. If you choose to buy a gap contract, the charge is shown in Item 4D of the Itemization of Amount Financed. See your gap contract for details on the terms and conditions it provides. It is a part of this contract.

Term _____ Mos. _____ Name of Gap Contract _____
I want to buy a gap contract.
Buyer Signs X _____

FOR USED VEHICLES ONLY

New Mexico law requires that this vehicle will be fit for the ordinary purposes for which the vehicle is used for fifteen days or five hundred miles after delivery, whichever is earlier, except with regard to the particular defects disclosed on the first page of this agreement. You (the consumer) will have to pay up to twenty-five dollars (\$25.00) for each of the first two repairs if the warranty is violated.

ATTENTION CONSUMER: SIGN HERE ONLY IF THE DEALER HAS TOLD YOU THAT THIS VEHICLE HAS THE FOLLOWING PROBLEM(S) AND YOU AGREE TO BUY THE VEHICLE ON THOSE TERMS:
ATENCIÓN CONSUMIDOR: FIRME AQUÍ SOLAMENTE SI EL VENDEDOR LE HA DICHO QUE EL VEHÍCULO TIENE EL/LOS SIGUIENTE(S) PROBLEMA(S) Y USTED ESTÁ DE ACUERDO EN COMPRAR EL VEHÍCULO SEGÚN ESTOS TÉRMINOS:

1. _____ 2. _____ 3. _____

X _____ (Date) _____ X _____ (Date) _____
Buyer Signs _____ Co-Buyer Signs _____

Agreement to Arbitrate: By signing below, you agree that, pursuant to the Arbitration Provision on the reverse side of this contract, you or we may elect to resolve any dispute by neutral, binding arbitration and not by a court action. See the Arbitration Provision for additional information concerning the agreement to arbitrate.
Buyer Signs X _____ Co-Buyer Signs X _____

NO COOLING OFF PERIOD

State law does not provide for a "cooling off" or cancellation period for this sale. After you sign this contract, you may only cancel it if the seller agrees or for legal cause. You cannot cancel this contract simply because you change your mind. This notice does not apply to home solicitation sales.

HOW THIS CONTRACT CAN BE CHANGED. This contract contains the entire agreement between you and us relating to this contract. Any change to this contract must be in writing and we must sign it. No oral changes are binding. Buyer Signs X _____ Co-Buyer Signs X _____
If any part of this contract is not valid, all other parts stay valid. We may delay or refrain from enforcing any of our rights under this contract without losing them. For example, we may extend the time for making some payments without extending the time for making others.
You authorize us to obtain information about you or the vehicle you are buying from the state motor vehicle department or other state or federal agencies.

HOW THIS CONTRACT CAN BE CHANGED. This contract contains the entire agreement between you and us relating to this contract. Any change to this contract must be in writing and we must sign it. No oral changes are binding. Buyer Signs X _____ Co-Buyer Signs X _____
 If any part of this contract is not valid, all other parts stay valid. We may delay or refrain from enforcing any of our rights under this contract without losing them. For example, we may extend the time for making some payments without extending the time for making others.
 You authorize us to obtain information about you, or the vehicle you are buying, from the state motor vehicle department or other motor vehicle registration authorities.
See back for other important agreements.

NOTICE TO THE BUYER: 1. Do not sign this contract before you read it or if it contains any blank spaces. 2. You are entitled to an exact copy of the contract you sign:

The Annual Percentage Rate may be negotiable with the Seller. The Seller may assign this contract and retain its right to receive a part of the Finance Charge.
 You agree to the terms of this contract. You confirm that before you signed this contract, we gave it to you, and you were free to take it and review it. You acknowledge that you have read both sides of this contract, including the arbitration provision on the reverse side, before signing below. You confirm that you received a completely filled-in copy when you signed it.

NOTICE TO BUYER: LIABILITY INSURANCE FOR BODILY INJURY CAUSED TO YOURSELF OR TO OTHERS OR PROPERTY DAMAGE CAUSED TO OTHERS IS NOT PROVIDED WITH THIS AGREEMENT. IF YOU DESIRE LIABILITY INSURANCE COVERAGE, YOU SHOULD OBTAIN SUCH COVERAGE FROM AN AGENT OF YOUR CHOICE.

Buyer Signs X _____ Date 08/20/15
 Co-Buyer Signs X _____ Date 08/20/15
 Co-Buyers and Other Owners — A co-buyer is a person who is responsible for paying the entire debt. An other owner is a person whose name is on the title to the vehicle but does not have to pay the debt. The other owner agrees to the security interest in the vehicle given to us in the contract.
 Other owner signs here X N/A Date N/A
 Address _____

Seller signs _____ Date 08/20/15 By X _____ Title _____

Seller assigns its interest in this contract to _____ (Assignee) under the terms of Seller's agreement(s) with Assignee.

Assigned with recourse Assigned without recourse Assigned with limited recourse

Seller _____ By _____ Title _____

Buyer's Order Agreement

8601 Lomas NE
Albuquerque, NM 87110
P.O. Box 3487
Albuquerque, NM 87190
Phone: 505-292-0000
Fax: 505-275-4164

Buyer Name(s) _____ Date _____
Address _____ City _____ State _____ Zip _____ Phone _____

Year	Make	Model	Body	Cyl.	New / Used / Demo
VIN		Color	Odometer	Stock No.	

Trade In	Year	Make	Model	Color
VIN			Odometer	

Vehicle Price (as equipped)	
Other Adds	
Total Cash Price	
Trade-In Allowance	
Loan Payoff on Trade <small>(Buyer is responsible for any trade-in loan payoff quotation error)</small>	
Net Equity In Trade	
Less Cash Down Payment	
Less Factory Rebate	
Subtotal	
State Excise Tax	
State Title and Registration Fees	
Dealer Transfer Service Charge	
Service Contract	
Total Other Charges	
Balance Due	

WARRANTY INFORMATION

(Buyer Initials) **NEW VEHICLES AND DEMONSTRATORS:** THIS VEHICLE IS SOLD WITH A MANUFACTURER'S LIMITED WARRANTY. THE MANUFACTURER'S LIMITED WARRANTY IS BUYER'S EXCLUSIVE REMEDY FOR ANY DEFECTS IN THE VEHICLE. DEALER MAY PERFORM REPAIRS UNDER THE MANUFACTURER'S LIMITED WARRANTY, BUT DEALER IS NOT RESPONSIBLE FOR THE MANUFACTURER'S LIMITED WARRANTY OR FOR ANY IMPLIED WARRANTIES MADE BY THE MANUFACTURER. DEALER MAKES NO WARRANTY ON THIS VEHICLE AND DISCLAIMS ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. IF ANY WARRANTY IS DEEMED TO HAVE BEEN MADE BY DEALER, OR IF THIS VEHICLE IS SOLD WITH A SERVICE CONTRACT, THE TERMS OF ANY SUCH WARRANTY OR SERVICE CONTRACT ARE AS PROVIDED THEREIN, ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE ARE LIMITED TO THE DURATION OF SUCH WARRANTY OR SERVICE CONTRACT, AND BUYER'S EXCLUSIVE REMEDY IS REPAIR OR REPLACEMENT OF DEFECTIVE PARTS BY DEALER.

(Buyer Initials) **USED VEHICLES:** NEW MEXICO LAW REQUIRES THAT THIS VEHICLE WILL BE FIT FOR THE ORDINARY PURPOSES FOR WHICH THE VEHICLE IS USED FOR FIFTEEN DAYS OR FIVE HUNDRED MILES AFTER DELIVERY, WHICHEVER IS EARLIER, EXCEPT WITH REGARD TO PARTICULAR DEFECTS DISCLOSED ON THE FIRST PAGE OF THIS AGREEMENT. YOU (THE CONSUMER) WILL HAVE TO PAY UP TO TWENTY-FIVE DOLLARS (\$25.00) FOR EACH OF THE FIRST TWO REPAIRS IF THE WARRANTY IS VIOLATED. THIS VEHICLE IS OTHERWISE SOLD **AS IS** (AFTER 15 DAYS OR 500 MILES), WITHOUT ANY FURTHER WARRANTY, EXPRESS OR IMPLIED, UNLESS A FURTHER WARRANTY IS GIVEN IN WRITING BY DEALER. IF ANY FURTHER WARRANTY IS GIVEN IN WRITING BY DEALER, OR IF THIS VEHICLE IS SOLD WITH A SERVICE CONTRACT, THEN THE TERMS OF SUCH FURTHER WARRANTY OR SERVICE CONTRACT ARE AS PROVIDED THEREIN, ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE ARE LIMITED TO THE DURATION OF SUCH WRITTEN WARRANTY OR SERVICE CONTRACT, AND BUYER'S EXCLUSIVE REMEDY IS REPAIR OR REPLACEMENT OF DEFECTIVE PARTS BY DEALER.

USED VEHICLES: ATTENTION CONSUMER: Sign here only if the dealer has told you that this vehicle has the following problems and you agree to buy the vehicle on those terms:

1 _____ 2 _____ 3 _____

Consumer Signature: _____

ALL VEHICLES: DEALER IS NOT LIABLE FOR INCIDENTAL, CONSEQUENTIAL OR PUNITIVE DAMAGES ARISING OUT OF THIS SALE OR THE USE OF THIS VEHICLE, INCLUDING BUT NOT LIMITED TO LOSS OF USE, LOSS OF TIME, INCONVENIENCE, TRANSPORTATION, RENTAL, LOSS OF EARNINGS OR PROFITS, OR ANY COMMERCIAL LOSS. (This paragraph only applies after expiration of New Mexico's automatic 15-day/500-mile implied warranty in the case of used vehicles.)

USED VEHICLES AND DEMONSTRATORS: THE INFORMATION YOU SEE ON THE WINDOW FORM FOR THIS VEHICLE IS PART OF THIS CONTRACT. INFORMATION ON THE WINDOW FORM OVERRIDES ANY CONTRARY PROVISIONS IN THE CONTRACT OF SALE.

Dealer states under oath that to the best of Dealer's knowledge there has been no alteration or chassis repair due to wreck damage on the vehicle being purchased, except as noted on this agreement.

Dealer _____

Buyer states under oath that to the best of Buyer's knowledge there has been no alteration or chassis repair due to wreck damage on the trade-in vehicle, except as noted on this agreement.

Buyer _____

NOTICE TO BUYER: Buyer has the right to void this purchase if financing is not approved within 20 calendar days after delivery of the vehicle. Buyer has the right to the return of any trade-in and all money paid by buyer, if buyer voids this contract under this paragraph. To exercise this right, buyer must return the vehicle to the dealer in the same condition as received (normal wear and tear excepted), within 48 hours of receipt of notice that financing was not approved. Dealer shall not charge any fees as long as the vehicle is returned as provided in this paragraph.

BUYER'S SIGNATURE X _____ DATE _____ BUYER'S SIGNATURE X _____ DATE _____

The full purchase price is due upon delivery. This is a buyer's order agreement, not a credit agreement. Dealer is not a lender. Dealer may assist Buyer in obtaining third party financing, but Dealer is not responsible for obtaining financing. Dealer does not guarantee credit approval. Buyer grants Dealer a security interest in the vehicle being purchased.

SUMMONS	
District Court: <u>Second Judicial District</u> <u>Bernalillo County</u> New Mexico Court Address: PO Box 488 5100 2nd Street NW Albuquerque, NM 87104 Court Telephone No: 505/841-8400	Case Number: D-202-CV-2017-01024 Judge: Denise Barela-Shepherd
David and Marie Hopper, Plaintiff(s) v. Richardson Ford Sales, Inc., Ford Motor Company, and Ford Motor Credit Company LLC, Defendant(s)	Defendant Name: Ford Motor Company Address: 123 East Marcy Street Santa Fe, New Mexico 87501

TO THE ABOVE NAMED DEFENDANT(S): Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issues this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
6. If you need an interpreter, you must ask for one in writing.
7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at www.nmbar.org; or 1-800-876-6657; or 1-505-797-6066.

Dated at _____, New Mexico, this ____ day of 2/15/2017, 2017.



JAMES A. NOEL
 CLERK OF THE DISTRICT COURT

By: *Jatoya Gray*
 Deputy Clerk

/s/ Barry Green
 Signature of Attorney for Plaintiff
 Name: Barry Green
 Address: Suite 7, 200 West DeVargas Street
 Santa Fe, New Mexico 87501-2672
 Telephone No.: 505/989-1834
 Fax No.: 505/982-8141
 Email Address: LawOfficeOfBarryGreen@msn.com

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

Case

CAS-11241125-L8V8W3


General Info

Overview

Case Number	CAS-11241125-L8V8W3	Status	Resolved
Priority	Urgent	Owner	 Tier 2 CCT
Expected Resolution Date		Status Reason	Resolved Closed
Input Channel	Web Portal		

Close Case

Close Case Info

Resolution Type	 Addressed	Comments - Close Case
Closure Type	Resolved	

Customer Info

Advanced Search

Search On	Contact	Search By
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Customer Name	 DAVID HOPPER	Caller Type
Best Contact Method	Phone	Use for Reply-To
Best Daytime Phone		Customer Delegate
Customer Home Phone	(505) 639-5760	Customer Delegate Phone
Customer Business Phone	(505) 925-0302	Relationship
Customer Mobile Phone	505 908 7467	
Vehicle Purchase Status		

Current LTV Score 31

Customer Scores

Loyalty Score		Defector Score	
LTV Score	31	Dissat Score	
In-Market		ESP Score	
Likelihood to Service		Service Segments	
Loyalty Segment - Mexico			


Dealer Info

Dealer Info








Dealer Name	 Rich Ford Sales, Inc.		
Dealer PA Code	20307	Dealer Service Manager	
Dealer Phone Number	(505) 292-0000	More than one Service Manager	No
Dealer Contact	 PAUL BARTLETT	Service Mgr Phone	
Ford CSM	 Lartasha Jordan	Portal Status	No New Message
FMCC Branch Code			

Vehicle Info

Vehicle Info

VIN	 1FM5K8F89FGC05792	Mileage	3,492
Warranty Start Date		Mileage Units	Miles
Vehicle Modifications	No	Hours in Service	
Original Selling Dealer		Converted Mileage	
Original Selling PA		Days Out of Service	79.00
		Number of Repairs	4

Vehicle Specification




Vehicle Specification Full Path  2015 > FORD > EXPLORER > K8F - EXPLORER LIMITED 4WD 4-DR
Model Year  2015 **Engines Specification**  3.5L V6 CYCLONE TIVCT
Make  FORD **Transmissions Specification**  6 SPD AUTO TRANS 6F55
Model / Vehicle Line  EXPLORER
Body Style  K8F - EXPLORER LIMITED 4WD 4-DR

Equipment and Software

SYNC Version
Modem / TCU?
Installed SYNC Software Version **Installed Date**
WiFi Capable
WiFi Enabled **Date Retrieved**

Case Classification


Classification

Responsible Team  Tier 2 CCT
Case Classification Full Path  Dealer - Vehicle Concern > Legal > Request For Consumer Affairs Review
Case Classification Level 1  Dealer - Vehicle Concern
Case Classification Level 2  Legal
Case Classification Level 3  Request For Consumer Affairs Review
Case Classification Level 4

Classification

Initial Contact Target 12/13/2016 8:00 AM **Initial Contacted** No
Case Closure Target 1/25/2017 5:00 PM **Initial Contact Date**

Symptom Code

Symptom Code  Start/Run/Move > Odor > Not Listed > OTHER

- Level 1  Start/Run/Move
- Level 2  Odor
- Level 3  Not Listed
- Level 4  OTHER

Miscellaneous Info

Miscellaneous Info

Master Case

Caller Authorization Code 0009417599

Stars ID

Tech Hotline No

FSA Number

Campaign Number

Repair Order Number

Chat UID

Contract Info

Ford Credit Contract #

Form Letter Code

ESP Contract #

Non-Ford ESP No

Activities

All Activities

<input type="checkbox"/>	Subject	Activity Type	Activity Status	Priority	Date Created
<input type="checkbox"/>	 Case Resolution	Case Resolution	Completed	Normal	12/12/2016 10:...
<input type="checkbox"/>	 Close Case	Close Case	Completed	Normal	12/12/2016 10:...
<input type="checkbox"/>	 Portal Message	Portal Message	Completed	Normal	12/12/2016 10:...
<input type="checkbox"/>	 Ford/Lincoln Loyalty Requ...	Ford/Lincoln Loyalty Req...	Completed	Normal	12/10/2016 5:4...
<input type="checkbox"/>	 Transfer / Escalate	Transfer/Escalation	Completed	Normal	12/10/2016 5:3...

1 - 5 of 5 (0 selected)

Page 1

Notes & Article

Notes

Title: Note created on 12/12/2016 10:34 AM by Lartasha Jordan, Default Team: Tier 2 CCT

Good Morning Paul, Please have the customer's Lawyer redirected to Office of General Counsel. Their mailing address is Ford Motor Company PO Box 70 Dearborn, MI 48121 Fax: 3138455555 Thank you, Ford Motor Company @ Lartasha Jordan CCT CSM 18666313788 ext. 77711 / eFax: 866-598-1130 ljorden1@ford.com | www.ford.com

Lartasha Jordan 12/12/2016 10:35 AM

Title: Note created on 12/12/2016 10:34 AM by Lartasha Jordan, Default Team: Tier 2 CCT

OBE to DLR informing to have customer's Lawyer redirected to Office of General Counsel. Their mailing address is Ford Motor Company PO Box 70 Dearborn, MI 48121 Fax: 3138455555 Closing case.

Lartasha Jordan 12/12/2016 10:34 AM

Title: Note from Portal Message

Please have the customer's Lawyer redirected to Office of General Counsel. Their mailing address is Ford Motor Company PO Box 70 Dearborn, MI 48121 Fax: 3138455555

Lartasha Jordan 12/12/2016 10:32 AM

Title: Note created on 12/12/2016 09:45 AM by Lartasha Jordan, Default Team: Tier 2 CCT

Ticket Number: CAS-11241125-L8V8W3 Customer: DAVID HOPPER Business phone: (505) 925-0302 Home phone: (505) 639-5760 Mobile phone: 505 908 7467 LTV Score: 31 Vehicle Purchase Status: Per Navis Original Owner Dealer name: Rich Ford Sales, Inc. Dealer P&A: 20307 Dealer phone: (505) 292-0000 VIN: 1FM5K8F89FGC05792 Year : 2015 Make: FORD Model: EXPLORER Mileage: 3492 Warranty Start Date: 08/20/2015 Engines Specification: 3.5L V6 CYCLONE TIVCT Open Recall/FSA: NO ESP: NO Hotline Contact: G3ZAV010, FQBEO010 Warranty History: REpair Date: 12/08/2015 Dist (miles) 3492 cust comments smell in car tech comments replaced left/driver 1/4 vent Repair Date: 03/26/2016 Dist (Miles) 5630 cust comments smell in Cab tech comments replaced muffler assy. Repair Date 06/13/2016 Dist (Miles) 8426 cust comments cab smells like exhaust tech comments replaced left 1/4 panel vent

Lartasha Jordan 12/12/2016 9:45 AM

Title: Requestor/Approver Comments

Refer to case notes

SYSTEM 12/10/2016 5:40 PM

Title:

"By PAUL BARTLETT" - Customer was in multiple times for an exhaust odor in the cab. Repairs were performed per TSBs , hotline and FSEs assistance. Lest visit was in 8/2016. An FSE from the Phoenix region was sent on a TAR to inspect. he stated that the vehicle was operating within normal characteristics and closed the case. We delivered the vehicle back to the customer. We have now received an attorney letter stating that the customer wasn't happy with Fords offer of a 12K buyback. They are requesting that Rich ford buy it back for 39K. The letter is as follows... From: morrislaw@qwestoffice.net To: dsnyder340@aol.com CC: Dmoore970@comcast.net Sent: 12/5/2016 11:23:45 A.M. Mountain Standard Time Subj: David & Marie Hopper vs. Rich Ford Dennis, I left you a voice message a few days ago regarding our clients David and Marie Hopper. They purchased a new 2015 Ford Explorer from Rich Ford in August of last year. In December 2015, they reported an exhaust leak in the cab. There have been several attempts to fix the problem. The last time it was in the Rich Ford shop, they kept the vehicle for over 2 months, but the problem persists. This is clearly a violation of the New Mexico Lemon Law statute. We contacted Ford, requesting a buy back, but they would only offer \$12,000. As you may be aware, there are 2 class actions involved the exhaust leaks for the model years 2011 - 2015. But, my clients would just proceed under the NM Lemon Law which provides for a buy back and attorney's fee. There may be other claims as well, e.g. the vehicle was sold as "new", but had 1,089 miles on it. My clients were informed that this was because a manager drove it to Colorado. This was not disclosed at the time of sale. So, I'm contacting you to see if Rich Ford will buy back the vehicle with out the necessity of a lawsuit. Their loan balance is about \$39,000. They are also requesting to be reimbursed for their attorney's fees so far of \$1,500 plus tax. I can provide more details if needed. Can you assist us with this issue? Thanks, Kerry Morris 505 842 - 1362 Please advise that Ford will indemnify Rich Ford in this case.

CRM Admin Team 12/10/2016 5:38 PM

Article

Article


Admin Info

Admin Info

Created By

 CRM Admin Team

Modified By

 Lartasha Jordan

Created On	12/10/2016 5:37 PM	Modified On	12/12/2016 10:37 AM
Begin Date	12/10/2016	Case Type	Concern
Title	CAS-11241125-L8V8W3	Source Created By	

Case

CAS-10043413-B5C2T3


General Info

Overview

Case Number	CAS-10043413-B5C2T3	Status	Resolved
Priority	High	Owner	 Tier 2 CCT
Expected Resolution Date		Status Reason	Resolved Closed
Input Channel	Phone		

Close Case

Close Case Info

Resolution Type	 Addressed	Comments - Close Case
Closure Type	Resolved	

Customer Info

Advanced Search

Search On	Contact	Search By
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Customer Name	 DAVID HOPPER	Caller Type
Best Contact Method	Phone	Use for Reply-To
Best Daytime Phone		Customer Delegate
Customer Home Phone	(505) 639-5760	Customer Delegate Phone
Customer Business Phone	(505) 925-0302	Relationship
Customer Mobile Phone	505 908 7467	
Vehicle Purchase Status	Original Owner	

Current LTV Score 31

Customer Scores

Loyalty Score		Defector Score	
LTV Score	37	Dissat Score	
In-Market		ESP Score	
Likelihood to Service		Service Segments	
Loyalty Segment - Mexico			

Dealer Info

Dealer Info








Dealer Name	 Rich Ford Sales, Inc.	Dealer Service Manager	
Dealer PA Code	20307	More than one Service Manager	Yes
Dealer Phone Number	(505) 292-0000	Service Mgr Phone	
Dealer Contact		Portal Status	No New Message
Ford CSM	 Jessica Johnson		
FMCC Branch Code			

Vehicle Info

Vehicle Info

VIN	 1FM5K8F89FGC05792	Mileage	8,426
Warranty Start Date	8/20/2015	Mileage Units	Miles
Vehicle Modifications	No	Hours in Service	
Original Selling Dealer	Richardson Ford Sales Inc	Converted Mileage	
Original Selling PA	20333	Days Out of Service	
		Number of Repairs	

Vehicle Specification

Vehicle Specification  2015 > FORD > EXPLORER > K8F - EXPLORER LIMITED 4WD 4-DR
Full Path
Model Year  2015 **Engines Specification**  3.5L V6 CYCLONE TIVCT
Make  FORD **Transmissions Specification**  6 SPD AUTO TRANS 6F55
Model / Vehicle Line  EXPLORER
Body Style  K8F - EXPLORER LIMITED 4WD 4-DR

Equipment and Software

SYNC Version
Modem / TCU?
Installed SYNC Software Version **Installed Date**
WiFi Capable
WiFi Enabled **Date Retrieved**

Case Classification


Classification

Responsible Team  Tier 1 Inbound
Case Classification Full Path  Vehicle Concern > Repair Assistance > CCT Criteria
Case Classification Level 1  Vehicle Concern
Case Classification Level 2  Repair Assistance
Case Classification Level 3  CCT Criteria
Case Classification Level 4

Classification

Initial Contact Target 7/14/2016 10:00 AM **Initial Contacted** No
Case Closure Target 8/25/2016 5:00 PM **Initial Contact Date**

Symptom Code

Symptom Code  Start/Run/Move > Running > Smoke From Exhaust > OTHER

- Level 1  Start/Run/Move
- Level 2  Running
- Level 3  Smoke From Exhaust
- Level 4  OTHER

Miscellaneous Info

Miscellaneous Info

Master Case

Caller Authorization Code 0008220293

Stars ID

Tech Hotline No

FSA Number

Campaign Number

Repair Order Number

Chat UID

Contract Info

Ford Credit Contract #

Form Letter Code




ESP Contract #

Non-Ford ESP No

Activities

All Activities

<input type="checkbox"/>	Subject	Activity Type	Activity Status	Priority	Date Created
<input type="checkbox"/>	 Case Resolution	Case Resolution	Completed	Normal	11/9/2016 1:55...
<input type="checkbox"/>	 Close Case	Close Case	Completed	Normal	11/9/2016 1:55...
<input type="checkbox"/>	 Ford/Lincoln Loyalty Req...	Ford/Lincoln Loyalty Req...	Completed	Normal	11/9/2016 12:2...
<input type="checkbox"/>	 CALL From - 5052754546	Phone Call	Completed	Normal	11/9/2016 12:0...
<input type="checkbox"/>	 CAS-10043413-B5C2T3	Appointment	Completed	Normal	11/3/2016 1:32...
<input type="checkbox"/>	 DLR case - consult with C...	Schedule Follow-Up	Completed	Normal	11/3/2016 1:32...
<input type="checkbox"/>	 Transfer / Escalate	Transfer/Escalation	Completed	Normal	10/28/2016 5:4...

<input type="checkbox"/>	 Re-Open Case	Re-Open Case	Completed	Normal	10/28/2016 5:4...
<input type="checkbox"/>	 Case Resolution	Case Resolution	Canceled	Normal	8/8/2016 11:06...
<input type="checkbox"/>	 Close Case	Close Case	Completed	Normal	8/8/2016 11:06...

1 - 10 of 31 (0 selected) Page 1

Notes & Article

Notes

Title: Note created on 11/09/2016 01:55 PM by Lartasha Jordan, Default Team: Tier 2 CCT
 CSM Lartasha 77711 OBC to DLR (505) 292-0000 Spoke with Paul and Julian completed FLP approval code is MSPA831217. Closing case
 Lartasha Jordan 11/9/2016 1:55 PM

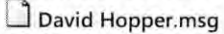
Title: Requestor/Approver Comments
 customer has a concern with exhaust fumes in the cab during hard acceleration at freeway speeds . vehicle was here for 33 days , ford hotline and the field service engineer involved to try and repair vehicle my manager had emailed copies previously . for rental request reimbursement
 SYSTEM 11/9/2016 12:23 PM

Title: Note created on 11/03/2016 01:33 PM by Lartasha Jordan, Default Team: Tier 2 CCT
 CSM Lartasha 77711 reviewing case received IBE from DLR requesting that case be re-opened and 1 month of rental reimbursement in the amount of \$990.00. F/U 11/14/2016 next steps: consult with COM in this regard.
 Lartasha Jordan 11/3/2016 1:32 PM

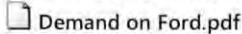
Title: Note created on 08/25/2016 01:00 PM by Jesenia Matos, Default Team: Tier 1 Inbound
 CUSTOMER SAYS: The cust wants to speak to Jessica Johnson about doing a buyback. PER CUST, DLR SAYS: n/a CRC ADVISED: "Told the cust that it has been noted that he has retained an attorney. I can no longer discuss any potential resolutions. Please have your attorney contact Ford Motor Company's Office of the General Counsel (OGC) in writing for potential resolution at: Ford Motor Company PO Box 70 Dearborn, MI 48121"
 Jesenia Matos 8/25/2016 1:03 PM

Title:
 "By PAUL BARTLETT" - This case appears to be closed. I have an attorney letter from the customer's attorney. The FSE that came down on 8-10 closed the hotline contact and stated that the vehicle was performing within normal specs. Customer is not happy and wants a buy back. Rich Ford is requesting that FMC indemnify Rich ford in this matter.
 CRM Admin Team 8/12/2016 4:20 PM

Title: Note created on 8/8/2016 11:04 AM by Jessica Johnson, Default Team: Tier 2 CCT
 CSM is unable to assist with this case any longer, CSM will be closing case and cust atty will have to reach out to Office of General Council regarding concerns. CSM cannot legally assist in this matter. Cust has retained an attorney
 Jessica Johnson 8/8/2016 11:05 AM

Title: File Attachment, Default Team: Tier 2 CCT
 From: Dmoore970 [mailto:dmoore970@comcast.net] Sent: Friday, August 05, 2016 6:21 PM To: Johnson, Jessica (J.) Cc: dhopper35
 Subject: Case number 10043413 Dear Jessica: I am the attorney for Dennis and Marie Hopper in this matter. Attached is the letter that I sent to Rich Ford. The Hoppers do not want to make any further attempts to repair their vehicle. They want to cancel the sale and take a refund. This is their clear right under Section 57-16A-3 of the New Mexico Motor Vehicle Quality Assurance Act. Please direct this to the proper department at Ford and have them contact us. Sincerely yours, Deborah Moore Associate Attorney ABQ Law Clinic/Morris Law Firm 901 Lomas Blvd. NW Albuquerque, NM 87102 (505) 242-4529


Jessica Johnson 8/8/2016 11:05 AM


Title: File Attachment, Default Team: Tier 2 CCT
 CSM has received inbound email from cust atty, CSM closing case.


Jessica Johnson 8/8/2016 11:04 AM

Title: Note created on 8/3/2016 5:14 PM by Jessica Johnson, Default Team: Tier 2 CCT
 OBC- Cust (505) 639-5760 CSM left vm advised CSM will contiune to work with dlrsp regarding case, CSM advised will complete GFR to see if veh is eligible for BB, CSM advised will reach out again once CSM has outcome of GFR. Next Step- submit GFR
 Jessica Johnson 8/3/2016 5:16 PM

Title: File Attachment, Default Team: Tier 2 CCT
 From: Johnson, Jessica (J.) Sent: Tuesday, July 26, 2016 2:41 PM To: Julian Armijo Cc: Part Bartlett Subject: Cases These are the ones I need updates on for today before I leave at 6:30 pm please. Some of these are in regards to rentals, I want to get these closed out

for you due to end of month if I don't get them I will be unable to provide code until I return next week. CAS-10043413-B5C2T3
DAVID HOPPER status of veh

 Rich Ford Sales, Inc. 07-26-16 status update request.msg

Jessica Johnson 7/26/2016 2:49 PM


Title: Note created on 7/22/2016 3:23 PM by Jessica Johnson, Default Team: Tier 2 CCT

OBC- Cust (505) 925-0302 CSM left vm for cust to call back, CSM advised that sup request was canceled same day it was requested and wanted to see if cust still was interested in speak with CSMs sup. CSM had missed follow ups when follow up was scheduled and did not contact cust when advised CSM would. CSM left contact info including CSMs email address. CSM advised would reach back out to cust on 7/26 Next Step - Follow up with cust and dlrs to check status of veh.

Jessica Johnson 7/22/2016 3:24 PM

Title: File Attachment, Default Team: Tier 2 CCT

From: pbartlett@rich-ford.com [mailto:pbartlett@rich-ford.com] Sent: Tuesday, July 19, 2016 10:39 AM To: Johnson, Jessica (J.)
Subject: RE: Cases Hopper. Waiting for tech to get hotline response (they are running slow right now). We have performed the vent TSB, replaced muffler per hotline, I am hoping they open a TAR for this one.

 Rich Ford Sales, Inc. 07-19-16 status update reply.msg

Jessica Johnson 7/21/2016 3:34 PM

Title: Document Customer Re-contact activity Completed, CaseNumber: CAS-10043413-B5C2T3. CRM:08131000041104

Email Created On: 7/21/2016 3:23:49 PM From: FMC360 Email Subscription To: Jessica Johnson, Leonard Hendricks Subject: Document Customer Re-contact activity Completed, CaseNumber: CAS-10043413-B5C2T3. CRM:08131000041104 Document Customer Re-contact activity Completed

FordCRMAppUserAccount CRM 7/21/2016 3:24 PM

Title: Document Customer Re-contact activity Completed, CaseNumber: CAS-10043413-B5C2T3. CRM:08131000041104

Email Created On: 7/21/2016 3:24:37 PM From: FMC360 Email Subscription To: Jessica Johnson, Leonard Hendricks Subject: Document Customer Re-contact activity Completed, CaseNumber: CAS-10043413-B5C2T3. CRM:08131000041104 Document Customer Re-contact activity Completed

FordCRMAppUserAccount CRM 7/21/2016 3:24 PM

Title: Note created on 07/21/2016 03:20 PM by Simone Hollis, Default Team: Tier 1 Inbound

CUST SAYS: I am calling to get the name of the CSM's supervisor. I was told yesterday that the case would be escalated up to them. PER CUST DEALER SAYS: n/a CRC ADVISED: I informed the cust that I cannot provide him with the name of the CSM's sup. He will be contacted today by them today by the COB. Cust stated he will be contacting his lawyer.

Simone Hollis 7/21/2016 3:21 PM

Title: Note created on 07/20/2016 04:09 PM by Samantha Smith, Default Team: Tier 1 Inbound

CUST SAYS he is wanting to speak with the CSM sup CUST SAYS, PER DLR n/a CRC ADV i will put in a request and you will be contacted tomorrow before COB

Samantha Smith 7/20/2016 4:11 PM


Title: Note created on 7/18/2016 5:37 PM by Jessica Johnson, Default Team: Tier 2 CCT

OBC- Cust (505) 925-0302 CSM left vm with contact info and advised follow up on 7/20 Next step - 2nd attempt

Jessica Johnson 7/18/2016 5:38 PM

Title: File Attachment, Default Team: Tier 2 CCT

From: Johnson, Jessica (J.) Sent: Monday, July 18, 2016 2:59 PM To: Julian Armijo Cc: 'pbartlett@rich-ford.com' Subject: Cases Here are the cases I need an update on as soon as possible please. Thank you! CAS-10043413-B5C2T3 DAVID HOPPER New case: Cust says: purchased at dlr, 10 mos, added 6000 mi been in shop 50 days, 3rd time, problem sunroof broken, dent in car, exhaust leak in cabin, strut mount, exhaust leak problem making pymts w/o having the car. 3rd issue with exhaust leak coming up 60 days for repair and

 Rich Ford Sales, Inc. 07-18-16 status update request.msg

Jessica Johnson 7/18/2016 3:02 PM

Title: RE: CAS-10043413-B5C2T3 CRM:02286000000206

Email Created On: 7/15/2016 11:34:37 AM From: Jessica Johnson To: Sarah Trimble Subject: RE: CAS-10043413-B5C2T3 CRM:02286000000206 Thank you! Ford Motor Company (r) Jessica Johnson | Customer Service Manager |FCSD 866-6313788 x 77709| eFax: 1-855-906-1030 JJOH1004@ford.com| www.ford.com

FordCRMAppUserAccount CRM 7/15/2016 11:34 AM

Title: RE: CAS-10043413-B5C2T3 CRM:02286000000206

Email Created On: 7/15/2016 11:34:23 AM From: Jessica Johnson To: Sarah Trimble Subject: RE: CAS-10043413-B5C2T3 CRM:02286000000206 Thank you! Ford Motor Company (r) Jessica Johnson | Customer Service Manager |FCSD 866-6313788 x 77709| eFax: 1-855-906-1030 JJOH1004@ford.com| www.ford.com

FordCRMAppUserAccount CRM 7/15/2016 11:34 AM

Title: CAS-10043413-B5C2T3 CRM:02286000000206

Email Created On: 7/15/2016 11:33:52 AM From: Sarah Trimble To: Jessica Johnson Subject: CAS-10043413-B5C2T3 CRM:02286000000206 Hello Jessica, CRC sent to the wrong dlrs. I have transferred over to yours. I called Rich Ford Sales to confirm veh is there and I left the cust a vm. Thank you, Sally Trimble Legal name is Sarah I use my nickname Sally Senior Certified - Customer Service Manager (CSM) Ford Motor Company (r) SDR REGIONS B05 B06 B09 Direct Line: 866-631-3788 ext 77750 Fax: 888-

897-9878 Email: strimbl1@ford.com Confidentiality Notice: This email may contain privileged communications. If you received it in error, please delete it immediately and notify sender.

FordCRMAppUserAccount CRM 7/15/2016 11:33 AM

Title: CAS-10043413-B5C2T3 CRM:0228600000206

Email Created On: 7/15/2016 11:33:42 AM From: Sarah Trimble To: Jessica Johnson Subject: CAS-10043413-B5C2T3 CRM:0228600000206 Hello Jessica, CRC sent to the wrong dlrshp. I have transferred over to yours. I called Rich Ford Sales to confirm veh is there and I left the cust a vm. Thank you, Sally Trimble Legal name is Sarah I use my nickname Sally Senior Certified - Customer Service Manager (CSM) Ford Motor Company (r) SDR REGIONS B05 B06 B09 Direct Line: 866-631-3788 ext 77750 Fax: 888-897-9878 Email: strimbl1@ford.com Confidentiality Notice: This email may contain privileged communications. If you received it in error, please delete it immediately and notify sender.

FordCRMAppUserAccount CRM 7/15/2016 11:33 AM

Title: Note created on 07/15/2016 11:29 AM by Sarah Trimble, Default Team: Tier 2 CCT

CSM Sally x 77750 - obc to Richardson Ford dlrshp @ 989-846-4511 SM Kevin - veh has never been to this dlrshp - obc to 20307 Rich Ford Sales @ 505-292-0000 spoke with Tony confirmed veh is at the dlrshp - Obc to cust @ 505-639-5760 - vm - lm advising that CSM Jessica Johnson x 77709 - will be making contact today by cob - CSM Sally sent an email to CSM Jessica - Sarah Trimble 7/15/2016 11:30 AM

Title: Note created on 07/15/2016 11:25 AM by Sarah Trimble, Default Team: Tier 2 CCT

Ticket Number: CAS-10043413-B5C2T3 Customer: DAVID HOPPER Business phone: (505) 925-0302 Home phone: (505) 639-5760 Mobile phone: (505) 639-5760 LTV Score: 37 Vehicle Purchase Status: Original Owner Dealer name: Rich Ford Sales Dealer P&A: 20307 Dealer phone: 505-292-0000 VIN: 1FMSK8F89FGC05792 Year : 2015 Make: FORD Model: EXPLORER Mileage: 6000 Warranty Start Date: 8/20/2015 Engines Specification: 3.5L V6 CYCLONE TIVCT Open Recall/FSA: none ESP: none Hotline Contact: G7MJH676 for the exhaust smell - Warranty History: 5 concerns - 1 for sunroof - 2 for an exhaust smell 08/24/2015 @ 1146 miles - sunroof shade makes squeaking noise - replaced moon roof shade 12/08/2015 @ 3492 miles - exhaust smell in car- TSB 14-0130 reprogrammed HVACc- resealed rear of veh - installed liftgate vents - replace left driver ¼ vent - 03/26/2016 @ 5630 miles - exhaust smell in cab upon accel - per NHL replaced muffler asy

Sarah Trimble 7/15/2016 11:26 AM

Title: Note created on 07/13/2016 06:44 PM by Gladys Portalatin, Default Team: Tier 1 Inbound

Cust says: He mentioned that his truck is qualifying for the Nevada Lemon law

Gladys Portalatin 7/13/2016 6:45 PM

Title: Note created on 07/13/2016 06:40 PM by Gladys Portalatin, Default Team: Tier 1 Inbound

Cust says: purchased at dlr, 10 mos, added 6000 mi been in shop 50 days, 3rd time, problem sunroof broken, dent in car, exhaust leak in cabin, strut mount, exhaust leak problem making pymts w/o having the car. 3rd issue with exhaust leak coming up 60 days for repair and Per Cust Dlr says: contacting ford to try different things, and the service techs are not in. CRC Advised: I will escalate your case/request to our Ford Regional Customer Service Manager who works daily with your dealership's management team. The Ford Regional Customer Service Manager has access to all Ford resources and will use these resources to assist you and your dealership regarding your situation. The Ford Regional Customer Service Manager will receive the information you have just provided me and will do a thorough review on your behalf. You can expect a phone call from your Customer Service Manager within 1 business day. The case number that I have established for you today is CAS-10043413.

Gladys Portalatin 7/13/2016 6:41 PM

Article

Article

Admin Info

Admin Info

Created By	 Gladys Portalatin	Modified By	 Lartasha Jorden
Created On	7/13/2016 6:38 PM	Modified On	11/9/2016 1:55 PM
Begin Date	7/13/2016	Case Type	
Title	CAS-10043413-B5C2T3	Source Created By	



**ABQ LAW CLINIC
MORRIS LAW FIRM, P.A.**

(505) 842-1362

KERRY MORRIS, LAWYER
901 Lomas Boulevard, N.W.
Albuquerque, New Mexico 87102

Fax (505) 242-7040

Via Regular Mail and Certified Mail No. 70143490000224595674

July 29, 2016

Rich Ford
Attention: Dennis Snyder, President
8601 Lomas Blvd. NE
Albuquerque, NM 87112

RE: Customer: David Hopper
Vehicle: 2015 Ford Explorer, VIN 1FM5K8F89FGC05792
R/O Number: 66360647

Dear Mr. Snyder:

This office represents David and Marie Hopper for the above-referenced vehicle. Please address any future communications to me.

David Hopper purchased his Ford Explorer from you on August 20, 2016, with a one-year warranty. During that time, it has had repeated problems with exhaust fumes leaking into the cab. Your repeated attempts to fix the problem have failed. Currently the car has been with you since June 13, 2016, and you still have not been able repair it.

Pursuant to Section 57-16A-3 of the Motor Vehicle Quality Assurance Act (the "Lemon Law"):

If the manufacturer or its agent or authorized dealer, after a reasonable number of attempts, is unable to conform the new motor vehicle to any applicable express warranty by repairing or correcting any defect or condition which substantially impairs the use and market value of the motor vehicle to the consumer, the manufacturer shall replace the motor vehicle with a comparable motor vehicle *or accept return of the vehicle from the consumer and refund to the consumer the full purchase price* including all collateral charges, less a reasonable allowance for the consumer's use of the vehicle.

.....

C. It shall be presumed that a reasonable number of attempts as mentioned in Subsection B of this section have been undertaken to conform a new motor vehicle to the applicable express warranties if:

.....

(2) the vehicle is in the possession of the manufacturer, its agent or authorized dealer for repair a cumulative total of thirty or more business days during such term or during such period whichever is the earlier date, exclusive of down time for routine maintenance as prescribed by the manufacturer.

ABQ LAW CLINIC
MORRIS LAW FIRM, P.A.

Addressee
August 5, 2016
Page 2

(Emphasis added). A copy of the relevant statute is attached.

The Explorer has been in your shop well in excess of thirty (30) business days. Mr. Hopper therefore directs you to cease your repair attempts, which have proven futile. He has further researched this type of vehicle and determined that the exhaust leak is not a unique problem with this particular car, but common to the model. A copy of that information is attached. He therefore does not want to replace the Explorer, but chooses to cancel his purchase and demand refund of the price.

If this cancelling the sale and refunding the purchase price is beyond Rich Ford's authority, please forward this demand to the appropriate authorities with Ford Motor and let me know their contact information.

I look forward to hearing from you, or from the appropriate department at Ford.

Sincerely,

ABQ LAW CLINIC
Morris Law Firm, P.A.

/s/ Deborah Moore

By Deborah Moore, Esq.

Enclosure: N.M.S.A. § 57-16A-3
Internet report on Ford Explorer exhaust leak

Cc: David and Marie Hopper

GCQIS Report Analysis

Report Summary

Report 1 of 1

Query Name: REPORT RETRIEVAL

Folder Number:

File Report To This Folder

File Report To A Folder

Exists in Folder(s)

Add Comments

Previous

Next

Save

Mail Report

Report Detail Section : View Details

Attachments: 0

Report# : G3ZAXX010 NHL

Reviewed Status: S

Received: 03/26/2016

CCRG/EPRC: S

Vehicle: 2015,EXPLORER 4X4 (U502),LIMITED,4 DOOR ,MPV ,1FM5K8F89FGC05792

Date: Build Date: 02/14/2015

Odometer : 8,426 M

Engine: 3.5L CYCLO

Calibration: EUB1SN0A

Transmission: 6F55

Axle: A/C: YES

Phone#: 505-275-4458

Dealer: USA 20307 Rich Ford Sales, Inc.

City: Albuquerque

Country : USA

State: New Mexico

Originator: David Dekoeyer

Symptom: 8 89 5 39 SAFE/SEC,SMOKE/ODOR,EXHAUST,INTERMITTENT

Status: V99 ALL OTHER

Phone#: 4458

VFG: V99 ALL OTHER

Additional Symptom: ODDOR AFTER 14-0130

TECH COMMENTS -- OTH

Fix: Y

Causal Component :

Condition Code:

Hotliner: RGARY4

Phone: --3177041

Regn Cd: W3 Phoenix

Engineering: Phone:

Dir Contact: DAVID DEKOEYER

Phone: TAR: CLD

Phone: Title Cde: T

Comments:**CONCERN 03/26/2016 12:33PM ROBERT GARY MSS - FCSD - TECH SVC HOTLINE**

Web Form Data (109834139) Description of Vehicle Concern: C/S EXHAUST SMELL IN CAB ON ACCEL. ON ACCEL. GETTING ON HIGHWAY OR GOING UPHILL. UNDER LOAD. SEE PREVIOUS RO # 6636064. CHECK AND ADVISE Please list any diagnostics already performed: none Parts Replaced: modified body, reprogrammed hvac per tsb 14-0130 Your Question: Anything new??

RECOMM 03/26/2016 12:33PM ROBERT GARY MSS - FCSD - TECH SVC HOTLINE

David, With TSB 14-0130 having already been performed, it is recommended to perform a bubble test to inspect the following areas for potential leaks even if that have already been sealed as the TSB has been successful in resolving this condition. . To perform a bubble testing, it is recommended to using masking tape to seal the rear air extractors(body vents) however it is not necessary to mask the rear lip molding for vehicle that do not have the rear lip molding removed. Once the rear air extractors are sealed off, start vehicle, set A/C to fresh air mode and set blower speed to max, close all doors and making sure that all of the windows are fully closed then use soapy water in a spray bottle then spray the under body seams, under body rubber grommets and rear wheel well seams. After testing the recommended areas, continue bubble test at the rear tail light seams, rear deck lid seals, siding panel glass seals, license plate area then mark any area(s) where bubbles are found. When all of the recommended areas have been tested, turn off A/C and the vehicle then clean and dry all areas marked earlier then using Motorcraft seam sealer TA-2 seal he suspected areas and allow sealant to dry which may take up to 20 minutes then test for bubbles. Once all of the suspected areas are sealed, verified that the air extractors are free from damage and are sealing correctly, inspect for evidence of body repairs and ensure that there are no missing or poorly seated body plugs in the floor pan or engine compartment bulkhead. If body plugs are found to be missing they should be replaced or if that are found to be leaking, they can either be replaced or sealed using the TA-2 sealer. It is recommended to verify the lift gate seal for damage along with proper fit/contact pattern then verify that lift gate plugs are in place in the drain holes. If the recommended inspections prove out ok, install Muffler assembly part EB5Z-5230- A then reevaluate the odor.

ADD-ON 03/26/2016 12:33PM ROBERT GARY MSS - FCSD - TECH SVC HOTLINE

Article ISM 1507013 SOME 2011-2016 EXPLORER VEHICLES MAY EXHIBIT A REPEAT CUSTOMER CONCERN OF EXHAUST ODOR INSIDE THE VEHICLE AFTER TSB 14-0130 HAS BEEN COMPLETED.

CONCER 06/14/2016 11:24AM STEVEN PERRY MSS - FCSD - TECH SVC HOTLINE

Web Form Data (110353042) Description of Vehicle Concern: Exhaust smell under load/acceleration. Please list any diagnostics already performed: Tsb 14-0130, reinspected pressurizing cabin, replaced exhaust. Parts Replaced: see above Your Question: Read other tech comments. I don't believe this has an exhaust leak. Now what???

RECOMM 06/14/2016 11:24AM STEVEN PERRY MSS - FCSD - TECH SVC HOTLINE

David, With there being an Exhaust-type odor detected after performing TSB 14-0130, inspecting the additional areas recommended and replacing the Muffler Assembly, ensure that there are no leaks in the replacement Muffler Assembly, or rest of the Exhaust system in front of it. To do this, block off one Exhaust Channel/Tailpipe, and supply 5 psi of regulated shop air to the other Exhaust Channel/Tailpipe, which will prevent damage to the Valve Seals in the Cylinder Heads. With the Exhaust pressurized, spray all welds and joints with a soapy water mix, and look for bubbles being produced. Replace/repair any faults found, and re-evaluate the concern. This concern is being directed to the Technical Assistance Center

Escalated Handling Team for additional review. An Escalated Handling Team Member will contact you by phone or through this Hotline Assistance Request within one (1) business day to provide additional information and/or recommendations to assist in the resolution of the customer's concern. We will continue to work with you and your Dealership's Service Management Team to help get the concern resolved and the vehicle back to the customer in a timely manner.

ADD-ON 06/14/2016 11:24AM STEVEN PERRY MSS - FCSD - TECH SVC HOTLINE

Note to EH, consulted Section Lead Greg Shimsnook on escalation due to a lack of technical progress. TSB 14-0130 has been performed, and the information from ISM 15-07-013 has been provided. The RO on the previous HAR is March 26, 2016.

ADD-ON 06/14/2016 11:24AM STEVEN PERRY MSS - FCSD - TECH SVC HOTLINE

Reason For Escalation: Technical Progress

CONCER 06/15/2016 03:09PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

Placed an outbound call to the Dealership and spoke with Crystal (Service Manager) who indicated the vehicle has been down for a total of 21 days while attempting to resolve the customer's concern of an exhaust odor within the vehicle when the vehicle is under load/acceleration. Crystal indicated that TSB 14-0130 was performed in December and the muffler was replaced with an updated component in March. Dave (Technician) verified that all of the body plugs on the underside and at the firewall/bulkhead of the vehicle are installed tightly. Dave also pressurized the

exhaust system per our most recent diagnostic path during the vehicle's last visit and no leaks were found. I discussed that it will be necessary to continue attempting to isolate any leaks with body seams, wheel well seams, tail light seams, liftgate seal, side panel glass seals, and the license plate area.

RECOMM 06/15/2016 03:09PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

Dave, Thank you for taking the time to speak with the Escalated Handling Team. As TSB 14-0130 was performed, the muffler was replaced, and the exhaust system was verified to not have any leaks, it is recommended to continue attempting to identify any leaks with the under body seams, wheel well seams, tail light seams, liftgate seal, side panel glass seals, and the license plate area by performing the cabin pressurization procedure. When inspecting for leaks around the liftgate seal, the door seals, and the side panel glass seals, leaks can be more easily identified by using an EVAP system smoke machine. When the cabin is pressurized, spray the smoke around the outside of the liftgate, glass, and doors seals. If a leak is present the smoke will be blown away from the seal in the area where the leak is present. Repair any leaks found as necessary and reevaluate the concern. A follow-up call has been set for Friday, June 17th to discuss the current status of the vehicle. If there are any questions or concerns or the smell is eliminated prior to the follow-up, please update this request with said information and an outbound call will be placed at that time.

ADD-ON 06/15/2016 03:09PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

No FMC360 cases
No Active TFOAMS

Crystal (Service Manager) cell# 505-991-1365

Dave (Technician) cell# 505-453-1249

The vehicle has been down for 21 days across three trips to the Dealership for an exhaust odor.

TSB 14-0130 was performed and the updated muffler assembly was installed. Exhaust pressure check was performed and no leaks were found. Recommended to continue with cabin pressurization and use soapy water/smoke machine to identify leaks and repair as necessary.

A follow-up call is expected to be placed on Friday, June 17th.

CONCER 06/15/2016 03:41PM T ECHHOT MSS - FCSD - TECH SVC HOTLINE

I started my reinspection of this vehicle and noted that the sunroof drain from the right/passenger rear of sunroof rail is routed to the rear hatch. I'm not an engineer, but this is a low pressure area venting into the passenger cabin. Could this be the cause?

CONCER 06/16/2016 02:09PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Dave. Dave stated he has not duplicated the exhaust odor this visit. He was wondering about the sunroof drain since it is going into a low pressure area if the odor could enter the cab that way. He has not had contact with the customer. Left voicemail for service manager Crystal. Spoke to the service advisor Tony who had taken over the vehicle for Luis. Tony stated he was not familiar with the vehicle since it was handed to him yesterday. Customer states odor present under a load or hard acceleration uphill. He advised Crystal was in a meeting.

RECOMM 06/16/2016 02:09PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Crystal, A follow-up call will be scheduled for later this afternoon to discuss this vehicle further.

ADD-ON 06/16/2016 02:09PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS. 505-453-1249 (cell) Crystal (SM) 505-991-1365 (cell) Tony Garcia (SA) 505-292-4451 (direct)

ADD-ON 06/16/2016 02:09PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Need updated.

CONCER 06/16/2016 02:12PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

update

RECOMM 06/16/2016 02:12PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

update

ADD-ON 06/16/2016 02:12PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Updating follow-up.

CONCER 06/16/2016 05:40PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Crystal. Kept getting transferred to a voicemail.

RECOMM 06/16/2016 05:40PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Crystal, A follow-up call will be placed tomorrow to discuss this vehicle further.

ADD-ON 06/16/2016 05:40PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Need updated.

CONCER 06/17/2016 08:00PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Tony. Tony stated he was riding with the customer and on hard acceleration up a hill with the AC system off, you could feel air coming through the vents. When letting off the accelerator, the air movement stopped. The customer smelled the exhaust odor when this occurred but Tony did not. He believed it was a suction issue.

RECOMM 06/17/2016 08:00PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Tony/Dave, To verify this is not forced air movement through the vents, recommend monitoring the mode door PID to note if it is changing positions when this occurs. If it is not, recommend comparing this air movement to another like known good unit (same model year, engine, transmission, 4WD, and HVAC system) under the exact same conditions and reevaluate. If the like unit does not compare, recommend performing a cabin pressure test as outlined in WSM section 501-00 around the entire vehicle to note for bubbles indicating a leak. Allow the cabin to build pressure for 10 minutes before spray soapy water on the vehicle. This is most likely not being caused by the sunroof drain tube since it would take a much longer time for the odor to be observed coming from the tiny tube than it would through a body leak. If no leaks are noted, recommend taping off the rear body vents completely and driving the vehicle under the exact same conditions and reevaluate. If it is still present, tape off the inlet door for the HVAC system and reevaluate. If the concern is no longer present, carefully inspect the door, HVAC case/plenum, and foam seal for any issues and that it is installed properly. A follow-up call will be scheduled for Tuesday to discuss this vehicle further.

ADD-ON 06/17/2016 08:00PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS.

ADD-ON 06/17/2016 08:00PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Needs to perform testing.

CONCER 06/20/2016 04:14PM T ECHHOT MSS - FCSD - TECH SVC HOTLINE

We had another unit for this concern. We ended up replacing rear bumper cover.

CONCER 06/20/2016 04:47PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

Outbound call to service manager Jullian. He stated he was not familiar with the vehicle. Provided the RO number and he advised to speak to Tony. Spoke to Tony who stated Dave had not gotten back to the vehicle yet to perform the previous testing since they have been busy.

RECOMM 06/20/2016 04:47PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

Dave/Tony, If you are suspecting the bumper cover, swapping from a known good like unit can be done and then re-tested. If the concern is still present, perform the previously recommended diagnostics to isolate the causal component. A follow-up call will be scheduled for Wednesday to discuss this vehicle further.

ADD-ON 06/20/2016 04:47PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

No FMC or TFOAMS. It does not appear this vehicle has a high priority at the dealer.

ADD-ON 06/20/2016 04:47PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

Needs to perform testing.

CONCER 06/22/2016 06:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

Outbound call to Tony. Was advised he was currently unavailable but to try back tomorrow around 10AM.

RECOMM 06/22/2016 06:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

Tony, A follow-up call will be scheduled for tomorrow to discuss this vehicle further.

ADD-ON 06/22/2016 06:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

No FMC or TFOAMS.

ADD-ON 06/22/2016 06:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

Need updated.

CONCER 06/23/2016 11:44AM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS -**KC**

Outbound call to Tony. Tony stated they are going to be driving the vehicle today to see if the previous repairs had been done or performed. Dave was off yesterday.

RECOMM 06/23/2016 11:44AM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Tony/Dave, Update this form when the previous recommendations have been performed and the concern isolated and you will be contacted as soon as possible.

ADD-ON 06/23/2016 11:44AM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS.

ADD-ON 06/23/2016 11:44AM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Needs to perform testing.

CONCER 06/29/2016 01:43PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Tony. Tony stated he has not been able to drive the vehicle after the repairs due to how busy they have been. He believed he should be able to this afternoon.

RECOMM 06/29/2016 01:43PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Tony, A follow-up call will be scheduled for tomorrow to discuss this vehicle further.

ADD-ON 06/29/2016 01:43PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS.

ADD-ON 06/29/2016 01:43PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Need to drive vehicle.

CONCER 06/30/2016 05:49PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Tony. Tony stated he has not been able to drive the vehicle to verify if it is still present. He attempted to have someone else drive the vehicle but they couldn't duplicate because they didn't know what conditions it was present under.

RECOMM 06/30/2016 05:49PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Tony, So that you and your technician Dave are on the same page and he knows how to duplicate the concern to verify if it is repaired or not, have Dave ride with you and show him how to duplicate the concern. Verify if the repairs that were made resolved the concern. A follow-up call will be scheduled for Tuesday.

ADD-ON 06/30/2016 05:49PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS.

ADD-ON 06/30/2016 05:49PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Need to duplicate concern.

CONCER 07/01/2016 12:17PM T ECHHOT MSS - FCSD - TECH SVC HOTLINE

Have monitored pids for door actuation, all good. Removed rear bumper, taped all openings and roadtest. Odor is gone. Should I reassemble or replace rear bumper cover? Any other suggestions?

CONCER 07/01/2016 03:34PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Dave. Dave stated he taped off the rear body vents and the odor was no longer present. He was wondering about a rear bumper cover issue. Outbound call to service manager Julian to update him on the situation. He advised this could be taken over by another technician while Dave is out. He was curious on what all is causing this concern.

RECOMM 07/01/2016 03:34PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Dave/Julian, It is possible that the rear bumper cover could be catching the exhaust exhibiting the odor present in the vehicle. Prior to bumper cover replacement, recommend only taping off the area around the body vents where they contact the body and see if the odor is still present under the same conditions present. If it is, then this is most likely either a repeat body vent failure or a bumper cover issue. A bumper cover can be swapped from a known good like unit and retested. If it is still present, then most likely a repeat body vent fault. If it is not present when only the area around the body vents are taped off, then this is most likely due to improper sealing where they contact the body and can be sealed with seam sealer TA-2-B. This odor inside of the vehicle can be caused by rear body vents, liftgate sealing, body leaks, exhaust issues, catalytic converter concerns, or purge valves stuck open. However, since the odor is not present with the body vents taped off, this is most likely being caused by a body vent or bumper cover concern.

Once this testing is performed, update this form and you will be contacted as soon as possible.

ADD-ON 07/01/2016 03:34PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS.

ADD-ON 07/01/2016 03:34PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Needs to perform testing.

CONCER 07/12/2016 02:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Jullian. Was advised he was not available. Spoke to Dave who stated he has not been able to perform the previously recommended yet.

RECOMM 07/12/2016 02:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Dave, Please perform the previously recommended diagnostics to isolate the causal component. A follow-up call will be scheduled for Thursday to discuss this vehicle further.

ADD-ON 07/12/2016 02:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS.

ADD-ON 07/12/2016 02:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Needs to perform testing.

CONCER 07/14/2016 05:11PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Dave. Dave stated he has performed repairs but he is currently waiting on someone to drive it for him to verify if the odor is present or not. Outbound call to Jullian to update him on situation.

RECOMM 07/14/2016 05:11PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Dave/Jullian, With the repairs made, verify if the odor is present with the area around the body vents taped off. If it is not, then this could be repaired by using seam sealer TA-2-B around the body vents where they contact the body and retest.

If it is present with only the area around the body vents taped off, recommend swapping the bumper cover off a known good like unit and retest. A follow-up call will be scheduled for Monday.

ADD-ON 07/14/2016 05:11PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

No FMC or TFOAMS.

ADD-ON 07/14/2016 05:11PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to FSE Mike Gusta to update him on situation. Advised I was having a difficult time with the dealer getting them to work or verify repairs as the only people who know how to duplicate it are Tony and Julian rather than Dave. Asked if he could help get the process moving and he advised he would show up to the dealer and help with it. I stated I had more technical but if I should open a TAR for days down and he said that I could continue to work with them since there are no FMC cases.

CONCER 07/18/2016 06:27PM ZACHARY SUTTON (FSE) MSS - FCSD - REG PHI-WAS-CHA

Outbound Call: A call was placed to the technician Dave. Dave informed that currently he cannot smell the exhaust odor and he is waiting for Word from his service advisor on whether the exhaust odor is still present. The service advisor Tony and service manager Julian were contacted however there was no answer so a voicemail was left.

RECOMM 07/18/2016 06:27PM ZACHARY SUTTON (FSE) MSS - FCSD - REG PHI-WAS-CHA

Dave, Your FSE has informed that the service manager Julian was going to test drive the vehicle last Friday. Please get in touch with the service advisor Tony or the service manager Julian to determine if the odor is still present and update this form.

ADD-ON 07/18/2016 06:27PM ZACHARY SUTTON (FSE) MSS - FCSD - REG PHI-WAS-CHA

- FMC360: CAS-10043413-B5C2T3: Repair assistance/Lemon Law - No TFOAM activity

ADD-ON 07/18/2016 06:27PM ZACHARY SUTTON (FSE) MSS - FCSD - REG PHI-WAS-CHA

Contacted FSE Mike who informed that he did not drive the vehicle however the service manager Julian informed that he will drive the vehicle as he can verify the odor.

CONCER 07/19/2016 05:56PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Tony. Tony stated he was off today and has not driven the vehicle yet. Outbound call to Julian. Julian stated he has not been at the dealer and just

returned today. He has not spoken with his FSE. He stated he will drive the vehicle today to verify if the odor is still present or not.

RECOMM 07/19/2016 05:56PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Julian/Dave, Once the vehicle has been driven after these most recent repairs, verify if the odor is still present and update this form once done and you will be contacted as soon as possible.

ADD-ON 07/19/2016 05:56PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

FMC case updated indicating customer states vehicle is becoming eligible for lemon law. No TFOAMS.

ADD-ON 07/19/2016 05:56PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Needs to verify concern after recent repairs. Will consider TAR if still present.

CONCER 07/20/2016 04:27PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to Julian. Julian stated they are now experiencing a very faint epoxy odor for half a second only once during their test drive. 2 other people went out and drove the vehicle and got the same odor for the same amount of time only once.

Didn't believe the concern was resolved.

RECOMM 07/20/2016 04:27PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Julian, With the epoxy odor now noticed rather than the exhaust odor, this indicates a body leak is still present allowing the odors to enter the vehicle. We have referred this concern to the Field Service Engineer (FSE) in your market area. The FSE should contact you and/or the Dealership management (Service Manager or Service Director) within one (1) business day to discuss further recommendations. If the FSE does not contact you directly, please consult with your Dealership management to discuss further recommendations and steps to assist in the resolution of this vehicle concern.

ADD-ON 07/20/2016 04:27PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

FMC case updated indicating customer wanting to speak to CSM.

ADD-ON 07/20/2016 04:27PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Attempted to reach FSE Mike Gusta but voicemail full. Will send email.

TAR 07/20/2016 04:27PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

NOTE TO FSE: WE ARE REQUESTING TECHNICAL ASSISTANCE FOR THIS VEHICLE DUE TO TECHNICAL PROGRESS RESOLVING AN EXHAUST ODOR, TIME DOWN, AND CUSTOMER NOW STATING LEMON LAW. THE VEHICLE HAS HAD THE TSB 14-0130 PERFORMED, REAR BODY VENTS REPLACED ALONG WITH BEING SEALED OFF, AND UPDATED MUFFLER INSTALLED. THERE DOES NOT APPEAR TO BE ANY BODY LEAKS FROM A CABIN PRESSURE TEST WITH SOAPY WATER OR SMOKE TESTING AND THE EXHAUST IS NOT LEAKING FROM SMOKE TESTING. THE TECHNICIAN DOES NOT KNOW HOW TO DUPLICATE THE CONCERN AS ONLY THE SERVICE ADVISOR TONY AND SERVICE MANAGER JULIAN KNOW HOW TO SO THE VEHICLE HAS SAT FOR SOME TIME IN-BETWEEN THEM DRIVING THE VEHICLE TO VERIFY THE REPAIRS. IT IS BELIEVED THAT THE ODOR IS NO LONGER PRESENT WHEN THE REAR BODY VENTS ARE TAPED OFF. THE ODOR IS NOW AN EPOXY ODOR DUE TO THE REPAIRS MADE. THERE IS A CRC CASE FOR REPAIR ASSISTANCE WHICH NOW THE CUSTOMER IS INDICATING VEHICLE IS ELIGIBLE FOR LEMON LAW. THE VEHICLE IS AT THE DEALER. ESTIMATED NUMBER OF REPAIR ATTEMPTS: 3. ESTIMATED NUMBER OF DAYS OUT OF SERVICE: 55

AUDIT 07/20/2016 04:27PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

TECH ASSIST REFERRAL HAS BEEN OPENED

ADD-ON 07/25/2016 08:13PM MIKE GUSTA (FSE) MSS - FCSD - REG PHOEN-DEN-SEA

FSE ONSITE 7/23. CONFIRMED MINOR BODY SEALER ODOR PRESENT IN CAB UNDER WOT WITH AC IN FRESH MODE. DIRECTED DEALER OBTAIN (2) RIGHT SIDE VENTS AND INSTALL IN LEFT AND RIGHT POSITION. RETEST AND RECONTACT FSE.

CONCER 07/26/2016 03:30PM T ECHHOT MSS - FCSD - TECH SVC HOTLINE

fse recommended replacing right 1/4 panel vent with left. Installed, roadtest. Odor still there....

RECOMM 07/26/2016 05:39PM MICHAEL TOMLINSON MSS - FCSD - TECH SVC HOTLINE

David, Thank you for the update on the repair attempts. According to notes updated by your FSE, it appears that their recommendation was to order 2 right side body vents, and install them on the right and left sides of the vehicle. If this was completed and the odor is still present, it is recommended to update your FSE with the results of those recommendations. Continue to follow any new recommendations

for repair direction per the FSE. The dealership Service Manager, Parts Manager, or Dealer Principle will have the FSE contact information if it is needed.

ADD-ON 07/26/2016 05:39PM MICHAEL TOMLINSON MSS - FCSD - TECH SVC HOTLINE

Consulted Cale Garrett

CONCER 08/01/2016 05:31PM T ECHHOT MSS - FCSD - TECH SVC HOTLINE

Waiting for fse

RECOMM 08/02/2016 08:33AM JAYSON VORE MSS - FCSD - TECH SVC HOTLINE

David, Thank you for the updated information, as instructed in the previous response, the dealership Service Manager, Parts Manager, or Dealer Principle will have FSE contact information if needed. Continue to follow the FSE recommendations to repair this vehicle.

CONCER 08/08/2016 01:05PM T ECHHOT MSS - FCSD - TECH SVC HOTLINE

Our FSE is on vacation til the 15th of June. I have a legal letter from the customer's attorney. I need another FSE like now. We need to stop this rental expense, and / or fix this vehicle. Please ask an FSE from Arizona or Colorado to help on this one.

CONCER 08/08/2016 03:41PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

Placed an outbound call to the Dealership and spoke with Paul (Parts and Service Director). Paul indicated that his FSE Mike is on vacation until the 15th of August and the customer's Attorney has mailed a letter to the Dealership regarding legal action to be taken for the vehicle to be bought back. Paul and I discussed that there are other FSE's available that are assisting with coverage of Mike's region and that I was currently attempting to reach Mike's supervisor to obtain information regarding who would be assisting with coverage while Mike is on vacation. I indicated that I would follow-up with Paul when this information was received by Mike's Supervisor.

RECOMM 08/08/2016 03:41PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

Paul, There are individuals available to assist with coverage while Mike is on vacation. Contact is being made to Mike's supervisor to determine which individual will be assisting with this vehicle moving forward. A follow-up call will be placed when this information is received. Thank you!

ADD-ON 08/08/2016 03:41PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

Consulted Cale Garret: Cale and I discussed who should be contacted since FSE Mike is on vacation and the TAR is still opened. It was determined to reach out to the TSOM. TSOM Troy Kimmerle was called. Troy indicated he was on vacation and indicated that Matt Sabus (Tech Ops Coordinator) was assisting while he is on vacation. OBC to Matt Sabus and left a voicemail with Matt and sent him an email

indicating him of the status of the vehicle and to discuss who would be assisting with coverage while Mike Gusta is on vacation.

ADD-ON 08/08/2016 03:41PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

FMC case # CAS-10043413-B5C2T3 updated 8/8/2016: Attorney contacted CRC, CRC closed case
Active TFOAMS: FSE directing right side vents be installed on left and right sides (7/26/2016)

Paul (Parts and Service Director) cell# 505-991-1414

Paul will be verifying that the left and right rear quarter vents were replaced with right side quarter vents and not left side quarter vents like David suggested. I will be following up with Matt Sabus to determine who is covering for Mike and reaching back out to Paul with information.

CONCER 08/08/2016 04:47PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

Placed an outbound call to Paul and left a voicemail with Paul indicating that FSE Bryan P. will be in Albuquerque tomorrow (8/09/2016) on business and will be stopping by the Dealership either tomorrow afternoon or Wednesday (08/10/2016) morning to work with the vehicle.

RECOMM 08/08/2016 04:47PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

Paul, After a discussion with Mike's Supervisor, Field Service Engineer Bryan P. will be in Albuquerque tomorrow, August 9th on business and will stop by the Dealership tomorrow afternoon or on Wednesday, August 10th in the morning to assist with repairs to the vehicle.

ADD-ON 08/08/2016 04:47PM GARY WOODEN MSS - FCSD - TECH SVC HOTLINE

No FMC updates
No TFOAMS updates

Left a VM with Paul indicating that FSE Bryan Perez would be at the Dealership tomorrow or Wednesday to work with the vehicle.

CONCER 08/08/2016 06:33PM T ECHHOT MSS - FCSD - TECH SVC HOTLINE

Gary. Don't know if you will still be the one responding here. But you asked if we put 2 right hand vents in. We put the one in on this repair. The other side vent was replaced on a previous RO. And yes, it has the same part number as the right vent.

ADD-ON 08/10/2016 04:02PM BRYAN PEREZ (FSE) MSS - FCSD - REG PHOEN-DEN-SEA

FSE ONSITE 8/9 AT REQUEST OF TSOM CURRENT ASSIGNED FSE M. GUSTA ON

VACATION. FSE DISCUSSED CONCERN WITH TECH, SD AND SA. SA STATED THAT CUSTOMER DEMONSTRATED CONCERN TO HIM AND NOTED THAT AT 65MPH THE AC COULD BE TURNED OFF AND THEN A HARD ACCELERATION PERFORMED AT WHICH POINT YOU WOULD GET COOL AIR FROM THE VENTS EVEN THOUGH THE SYSTEM WAS OFF, DURING THIS TIME CUSTOMER STATED HE WOULD GET AN ODOR. FSE CHECKED DTCS AND CONFIRMED THAT HVAC HAD LATEST CALIBRATION. FSE ALSO CONFIRMED THAT EXHAUST HAD BEEN UPDATED WITH 90DEG TURN DOWNS AT THE TIPS. FSE DROVE VEHICLE AND CONFIRMED THAT RECIRC DOOR WOULD FLIP TO FRESH AIR ON HARD ACCELERATION AS DESIGNED PER TSB 14-0130. FSE DUPLICATED CUSTOMERS SCENARIO AND CONFIRMED THAT COOL AIR WOULD COME OUT WHEN THE RECIRC DOOR WAS FLIPPED TO FRESH AIR ON HARD ACCEL. THE NEW CALIBRATION WILL PERFORM THIS FUNCTION EVEN WITH THE HVAC SYSTEM TURNED OFF. THIS IS CHARACTERISTIC AND BY DESIGN. FSE WAS UNABLE TO DETECT ANY EXHAUST ODOR HOWEVER IT WAS DIFFICULT BECAUSE OF THE OVERPOWERING AIR FRESHENER PRESENT IN THE VEHICLE. FSE ADVISED THAT ALL ACTIONS HAVE BEEN TAKEN FOR THIS CONCERN WITH NO REMAINING RECOMMENDATIONS. OPERATING THE HVAC SYSTEM IN FRESH AIR MODE WHEN DRIVING AGGRESSIVELY WILL RESOLVE ANY SLIGHT ODOR THE CUSTOMER MAY BE SMELLING. TAR WILL BE CLOSED BY CURRENT ASSIGNED FSE M. GUSTA UPON RETURN FROM HIS VACATION.

CONCER 08/11/2016 05:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to parts and service director Paul but was advised he was not available so left a voicemail.

RECOMM 08/11/2016 05:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Paul, Per a discussion with the FSE, it appears that the vehicle is operating as intended at this time so this escalation will be closed. Continue to work with your CSM if further buyback assistance is needed.

ADD-ON 08/11/2016 05:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Paul Bartlett (SD) No FMC or TFOAMS.

ADD-ON 08/11/2016 05:59PM CALE GARRETT (FSE) MSS - FCSD - REG MEMPHIS - KC

Outbound call to FSE Bryan Perez as he took over the vehicle for FSE Mike Gusta while he was on vacation. Bryan stated he inspected the vehicle and found that the TSB had been done properly and the updated exhaust had been installed. He found that under hard acceleration when vehicle in RECIRC mode, the inlet door will flip to

fresh air mode briefly. He could not duplicate the exhaust odor during multiple attempts. There was a strong air freshener smell inside of the vehicle. When the HVAC system was off and a hard acceleration was performed, a small short burst of cool air was felt through the vents. Found that the inlet door, even when left in RECIRC, will still flip to fresh air briefly. He advised no further repairs should be performed as the vehicle is operating as intended. We also discussed this issue on other vehicles and our thoughts on why this occurs.

ADD-ON 08/19/2016 03:10PM MIKE GUSTA (FSE) MSS - FCSD - REG PHOEN-DEN-SEA

CLOSE TAR

AUDIT 08/19/2016 03:10PM MIKE GUSTA (FSE) MSS - FCSD - REG PHOEN-DEN-SEA

TECH ASSIST REFERRAL HAS BEEN CLOSED

Folder Number: [File Report To This Folder](#) [File Report To A Folder](#) [Exists in Folder\(s\)](#)
[Add Comments](#) [Previous](#) [Next](#) [Save](#) [Mail Report](#)

Requester: SVEAL4
Report Summary
Server: FCVWS962

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8-Mar-2017
Retention: None

GCQIS Report Analysis

Report Summary

Report 1 of 1

Query Name: REPORT RETRIEVAL

Folder Number: **File Report To This Folder** **File Report To A Folder** **Exists in Folder(s)**

Add Comments **Previous** **Next** **Save** **Mail Report**

Report Detail Section : [Attachments: 3](#)

Report# :	FQBEQ010 HLIIEPA	Received:	10/02/2015
CCRG/EPRC:	<input type="text" value="v"/>	Date:	
Vehicle:	2015,EXPLORER 4X4 (U502) ,LIMITED,4 DOOR ,MPV ,1FM5K8F89FGC05792	Build Date:	02/14/2015
Odometer :	1,147 M	Engine:	3.5L CYCLO
Transmission:	6F55	A/C:	YES
Dealer:	USA 20307 Rich Ford Sales, Inc.	Phone#:	505-275-4458
City:	Albuquerque	State:	New Mexico
Country :		Country :	USA
Originator:	javin cadet		
Symptom:	7 71 A 62 LT/GL/VI,WINDOWS/GLASS ,ROOF SUNSCRN,POWER FUNCT		
Status:			
VFG:	V74 HARD TRIM/SOFT TRIM/OVERHEAD S		
Additional Symptom:	SQUEALING NOISE FROM SHADE		
Fix:	Causal Component :		
Condition Code:			
Region Code:	W3	Region Name:	Phoenix

Comments:

CONCER 10/02/2015 03:22PM KYLE SMITH MSS - FCSD - TECH SVC HOTLINE

RO#: 6626756 RO Date:8/24/2015 12:00:00 AM Warranty Type:New Vehicle
Warranty SPW Install Mileage: SPW Install Date: 1. Please describe customer concern, when the roof is sliding to open or close it is making a loud squealing noise
2. What is the intended repair, list all components needed for repair? replace the sliding panel for the sunroof 3. Provide any additional details necessary.
Please include any available technical information that you believe will help process your prior approval request, customer just purchased vehicle 1. Please describe customer concern, when the roof is sliding to open or close it is making a loud squealing noise 2. What is the intended repair, list all components needed for repair? replace the sliding panel for the sunroof 3. Provide any additional details necessary.
Please include any available technical information that you believe will help process your prior approval request, customer just purchased vehicle

RECOMM 10/02/2015 03:22PM KYLE SMITH MSS - FCSD - TECH SVC HOTLINE

Javin, The comments state the sunshade makes a squealing noise when in motion. There is no evidence of abuse or damage therefore, replacement of the Headliner Roof Sliding Panel (519A02) is warrantable. DIP A Approved* PAA9N

AUDIT 08/25/2016 08:23AM
CBVDI_ODMTR_UNIT_C BLANK CHANGED TO M BY CS0115VI

Folder Number: [File Report To This Folder](#) [File Report To A Folder](#) [Exists in Folder\(s\)](#)
[Add Comments](#) [Previous](#) [Next](#) [Save](#) [Mail Report](#)

Requester: SVEAL4
Report Summary
Server: FCVWS962

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8-Mar-2017
Retention: None

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Attachment Id : 9847687 [Top](#)



Attachment Id : 9847686 [Top](#)

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[View Report Attachment - Images](#)

Server: FCVWS962

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Retention: None

WOLFE, CHRISTENA

Note to Dealer

DO NOT PUT THE VEHICLE IN STORAGE OR PROVIDE LOANERS WITHOUT THE APPROVAL OF THE OFFICE OF THE GENERAL COUNSEL

NOTE: SEND AUTHORIZATION REQUEST TO FORDCALP@FORD.COM

ONCE WE ARE IN RECEIPT OF ALL THE REQUESTED INFORMATION, IT WILL BE THOROUGHLY REVIEWED AND THE CUSTOMER WILL BE NOTIFIED OF OUR DECISION

***EVALUATIONS MAY TAKE UP TO 90 DAYS ***

From: DCPFORM, FMCDealer (.)
Sent: Wednesday, August 17, 2016 2:00:34 PM (UTC-05:00) Eastern Time (US & Canada)
To: Ordcalp, F (F.); Taylor, Alma (A.)
Cc: srasmussen@dahlauto.com
Subject: Dealer/Fleet Request for OGC Review

Dealer/Fleet Request for OGC Review

Email Subject: Dealer/Fleet Request for OGC Review

DEALER INFORMATION:

Dealership Fleet Name: Dahl Ford Lincoln
Requesting Dealer Fleet: Dahl Ford Lincoln
PA Code: 11126
Contact Person: Shawn Rasmussen
Title: Service Manager
Phone Number: 6087796440
Fax Number:
Email: srasmussen@dahlauto.com

Region: twin cities

Address: 561 Theatre rd

City: Onalaska

State: Wisconsin

Zip Code: 54650

CUSTOMER VEHICLE INFORMATION:

Warranty Start Date: 10-17-15

Vehicle Year: 2016

Vehicle Model: explorer

Vehicle VIN: 1FM5K8GT8GGB05977

Mileage: 22199

customer Fleet Name: Christena Wolfe

Street Address: 28447 MOCCASIN AVE

City : KENDALL

State : Wisconsin

Zip Code : 54638

Home Phone: 608-372-2126

Work Phone: 608-343-9176

Customer Region: monroe

DETAILS OF INCIDENT:

Medical Attention Sought

Date of Incident: 2016-07-22

County incident occurred: monroe

Is customer alleging a component defect CAUSED the incident? YES

Details: c/s carbon monoxide fumes from vehicle caused her to be hospitalized

Was a police report filed? NO

Details :

Has the insurance company been contacted? NO

Insurance company advised:

Insurance company contact information:

Coach builder:

City :

State :

Zip Code :

Vehicle Location: Dahl Ford Lincoln 561 theatre rd Onalaska WI 54650

Attorney information:

CVO Contact:

Resolution Customer is seeking: c/s wants vehicle bought back with no charge to her

Comments:

Report# : G8DIQ923 CACVOC--or-- C1 0008404695MS
Received: 08/10/2016
CCRG/EPRC: **Reviewed Status:**
Date:
Vehicle: 2016,EXPLORER 4X4 (U502) ,SPORT ,4 DOOR ,MPV ,1FM5K8GT8GGB05977
Build Date: 09/21/2015
Odometer : 1 M **Engine:** 3.5L-GTDI **Calibration:** GUB1G10A
Transmission: 6F55 **Axle:** **A/C:** YES
Dealer: USA 11126 Dahl Ford Lincoln **Phone#:** 608-779-2886
City: Onalaska **State:** Wisconsin **Country :** USA
Originator:
Symptom: 8 89 5 39 SAFE/SEC,SMOKE/ODOR,EXHAUST,INTERMITTENT
Status:
VFG: V99 ALL OTHER
Additional Symptom:
Fix: **Causal Component :**
Condition Code:
Cust: CHRISTENA WOLFE **Home Phone:** ()
Work Phone: () **Region:** G5 Twin Cities
Case Status: **Date:** 00 / 00 / 0000 **Vehicle Paint:** MAGNETIC

OWNREL 08/05/2016 12:43PM

NOTE: CUSTOMER DID NOT PROVIDE A CONTACT PH # BUT DID PROVIDE EMAIL: christenaann@yahoo.com CUSTOMER SAYS: LETTER 7/29/16 EXHAUST FUMES COMING INTO CABIN OF VEHICLE, VEHICLE HAS BEEN TO DEALER AND THEY HAVE ORDERED PARTS. ASKING TO BE RELEASED FROM HER LEASE. CRC ADVISED: SENT LETTER TO CUSTOMER - CASE ESCALATED TO CCT

OWNREL 08/08/2016 01:01PM

Ticket Number: CAS-10227851-C4P6Q2 Customer: CHRISTENA WOLFE Business phone: (608) 372-2126 LTV Score: 85 Vehicle Purchase Status: Original Owner/Dealer name: Dahl Ford Lincoln Dealer P&A: 11126 Dealer phone: (608) 779-2886 VIN: 1FM5K8GT8GGB05977 Year : 2016 Make: FORD Model: EXPLORER Mileage: 1 Warranty Start Date: 10/17/2015 Engines Specification: 3.5L-4V DOHC T/C V6 GAS 350HP Open Recall/FSA: None ESP: No ESP Hotline Contact: 7/16/16 G7SDI014 Exhaust Odor - Warranty History: No recent repair history - TSB 14-130 should be recommended for this concern. Per Tech Hotline the vehicle should go to OGC. Also, NOTE: The Technical Assistance Center will not be able to provide further assistance with this issue until after the OGC review.

OWNREL 08/11/2016 06:46PM

OBC to DLR @ (608) 779-2886 LVM advised of role and requested more information on customers history. Call DLR on 8/17 for history contact cust on 8/19

OWNREL 08/16/2016 07:55PM

CSM Heather (77837) made OBC to dlr @ (608) 779-2886 which went to general

voicemailOBC to dlr @ 608-779-6440 which went to Service voicemail CSM left detailed VMOBC to dlr @ (608) 791-6483 which went to a dead lineOBC to (855) 416-6020 (number found on Google) Spoke to reception who transferred to voicemail Dealer is unresponsive. OBE to both contacts in 360 (email attached)
Next Steps: Call DLR - need R/Os. Has it gone to OGC

Requester: ATAYLO29
Report Summary
Server: ECCVWS962

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18-Aug-2016
Retention: None

Report# : G7SDI014 NHL
CCRG/EPRC:S **Reviewed Status:**
Vehicle: 2016,EXPLORER 4X4 (U502) ,SPORT ,4 DOOR ,MPV ,1FM5K8GT8GGB05977
Odometer : 22,199 M **Engine:** 3.5L-GTDI
Transmission: 6F55 **Axle:**
Dealer: USA 11126 Dahl Ford Lincoln
City: Onalaska **State:** Wisconsin **Country :** USA
Originator: BEN EVENSON
Symptom: 8 89 5 39 SAFE/SEC,SMOKE/ODOR,EXHAUST,INTERMITTENT
Status:
VFG: V99 ALL OTHER
Additional Symptom: EXHAUST ODOR
Fix: **Causal Component :**
Condition Code:
Hotliner: WSMITH46 **Phone:** --3170000 **Regn Cd:** G5 Twin Cities
Engineering: **Phone:** **TAR:**
Dir Contact: BEN EVENSON **Phone:** **Title Cde:** T

- CONCER 07/19/2016 03:19PM WALTER SMITH MSS - FCSD - TECH SVC HOTLINE**
 Web Form Data (110520999) Description of Vehicle Concern: CUSTOMER STATES OF EXHAUST SMELL IN VEHICLE AT TIMES. THIS CUSTOMER HAS BEEN GETTING SICK AND HAS BEEN TO THE DOCTER THREE TIMES WITH NO ABSOLUTE CONCLUSIONS. DOCTER TOLD HER TO CARRY A CARBON MONOXIDE DETECTOR WITH HER AND IT READS HIGH WHEN SHE IS IN THE VEHICLE. Please list any diagnostics already performed: INSPECTED EXHAUST SYSTEM, FOUND NO OBVIOUS LEAKS. Parts Replaced: NONE Your Question: I KNOW THERE WAS AN ISSUE WITH EARLIER EXPLORERS, BUT I CANNOT FIND ANY CURRENT BULLETINS FOR THIS SYMPTOM ON THIS VEHICLE. WHAT IS FURTHER DIAGNOSIS?
- RECOMM 07/19/2016 03:19PM WALTER SMITH MSS - FCSD - TECH SVC HOTLINE**
 Ben, some 2016 Explorer vehicles may exhibit an exhaust odor in the vehicle. If the odor can be duplicated the technical direction is TSB 14-130 should be recommended for this concern. This TSB is in the process of being updated.
- ADD-ON 07/19/2016 03:19PM WALTER SMITH MSS - FCSD - TECH SVC HOTLINE**
 Article ISM 1512009 2016 EXPLORER - EXHAUST ODOR IN THE CABIN
- CONCER 07/21/2016 11:11AM ETHAN WILLIAMS MSS - FCSD - TECH SVC HOTLINE**
 Outbound call to Ben. Ben was in a meeting and spoke to his service advisor, Alex. Instructed that due to the claims in the form that the vehicle will be escalated to OGC and that no repairs or further diagnostics should be performed until cleared to do so. Stated that parts have been ordered but no repairs have currently ben made.
- RECOMM 07/21/2016 11:11AM ETHAN WILLIAMS MSS - FCSD - TECH SVC HOTLINE**
 Ben and Alex, Due the customers claims of being sick and the detector indicating

CO in the vehicle, in pursuant to the Warranty and Policy Manual, no repairs should be performed. See below:

-U.S. Dealerships should complete a **Dealer/Fleet Request for OGC Review** found on FMCDealer.com - Parts & Service Tab - Customer Satisfaction link.

NOTE: The Technical Assistance Center will not be able to provide further assistance with this issue until after the OGC review.

ADD-ON 07/21/2016 11:11AM ETHAN WILLIAMS MSS - FCSD - TECH SVC HOTLINE
Instructed by Brian Graham to make an outbound call due to the claims in the form and that the vehicle should go to OGC.

Requester: ATAYLO29
Report Summary
Server: ECCVWS962

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18-Aug-2016
Retention: None

Title Note created on 08/17/2016 01:55 PM by Heather Gantt, Default Team: Tier 2 CCT

IBC from S/M Shawn who adv the cust brought veh in claiming she had been to hospital due to breathing carbon monoxide in vehicle.

S/A Alex explained to cust that the issue didn't apply to her veh and the concern was not verified.

S/A was adv not to do any repairs.

Sean took veh to local Fire Dept and CO2 tested with zero results

Veh was running 20 minutes or longer before testing

SM called cust and explained everything and req cust to bring in the CO2 tester she had used, the cust refused.

SM req doctors note and cust refused

Cust went to GM and stated she wanted it bought back

Cust has been in loaner for one month. Unable to get loaner back and unable to get her to pick veh up.

Cust forwarded VM from S/A Alex and he does state there is a TSB for previous model, not her model and that he tried to order parts for her. After the VM he was adv not to attempt repair

CSM adv SM to follow link to submit claim for OGC Review

Next Steps:

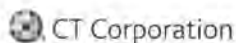
Visual Review for BB eligibility

Regarding CAS-10227851-C4P6Q2

File Attachment

File name:

COURVILLE, MARLENE



**Service of Process
Transmittal**

05/24/2017
CT Log Number 531281290

TO: Chris Dzbanski
Ford Motor Company
1 American Rd, Whq 421-E6
Dearborn, MI 48126-2798

RE: Process Served in Louisiana

FOR: Ford Motor Company (Domestic State: DE)

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

TITLE OF ACTION: Martene Courville, Ptf. vs. St. Martin Parish Acquisitions, LLC, etc. and Ford Motor Company LLC, Df's.
Name discrepancy noted.

DOCUMENT(S) SERVED: Citation, Petition

COURT/AGENCY: ST. MARTIN; 16TH JUDICIAL DISTRICT COURT, LA
Case # 085316

NATURE OF ACTION: Product Liability Litigation - Lemon Law - 2015 Ford Explorer, VIN: 1FM5K7D8XFGC14675

ON WHOM PROCESS WAS SERVED: C T Corporation System, Baton Rouge, LA

DATE AND HOUR OF SERVICE: By Process Server on 05/24/2017 at 09:00

JURISDICTION SERVED: Louisiana

APPEARANCE OR ANSWER DUE: Within 15 days after service

ATTORNEY(S) / BENDER(S): Jacques P. Soilleau
219 W. Bridge Street
P.O. Box 344
Breaux Bridge, LA 70717
337-332-4561

ACTION ITEMS: CT has retained the current log, Retain Date: 05/24/2017, Expected Purge Date: 05/29/2017
image SOP
Email Notification, Chris Dzbanski cdzbansk@ford.com
Email Notification, Mary Ann MacKinnon mmackin1@ford.com

SIGNED: C T Corporation System
ADDRESS: 3867 Plaza Tower Dr.
Baton Rouge, LA 70816-4378
TELEPHONE: 954-473-5503

CITATION

COURVILLE, MARLENE

Versus

ST MARTIN PARISH ACQUISITIONS LLC - ET AL



Case: 085316
Division: E
16th Judicial District Court
Parish of St. Martin
State of Louisiana

TO:
FORD MOTOR COMPANY
THROUGH AGENT
THE CT CORPORATION SYSTEM
3867 PLAZA TOWER DR.
BATON ROUGE, LA 70816

of EAST BATON ROUGE Parish, Louisiana.

You are hereby summoned to comply with the demand contained in the PETITION FOR DAMAGES of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, in the 16th Judicial District Court in and for the Parish of St. Martin, State of Louisiana, within fifteen (15) days after the service hereof, under penalty of default.

WITNESS MY OFFICIAL HAND AND SEAL OF OFFICE AT ST. MARTINVILLE, LOUISIANA, on this 11TH day of MAY, 2017.

BECKY P. PATIN
Clerk of the 16th Judicial District Court for
St. Martin Parish, Louisiana

BY: *Justine Prejean*
Deputy Clerk of Court

REQUESTED BY:
MR. JACQUES P. SOILEAU
ATTORNEY FOR MARLENE COURVILLE

Service Information

Received on the _____ day of _____, 20____ and on the _____ day of _____, 20____ served the above named party as follows.

Personal Service on the party herein named _____
Domiciliary Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.

Returned:
Parish of _____ this _____ day of _____, 20____.

Service \$ _____

Mileage \$ _____

Total \$ _____

By: _____
Deputy Sheriff

IN THE 16TH JUDICIAL DISTRICT COURT
FOR THE PARISH OF ST. MARTIN
STATE OF LOUISIANA

MARLENE COURVILLE

VERSUS

ST. MARTIN PARISH ACQUISITIONS, LLC
D/B/A COURTESY FORD LINCOLN AND
FORD MOTOR COMPANY LLC

DOCKET NO. 85316-E

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes, MARLENE COURVILLE, Plaintiff in the captioned matter, which is domiciled in the Parish of St. Martin, Louisiana, who respectfully represents the following, to-wit:

I.

Made a defendant herein is ST. MARTIN PARISH ACQUISITIONS, LLC, doing business as COURTESY FORD LINCOLN, a corporation organized to do and doing business in Louisiana by selling vehicles in State of Louisiana.

2.

Made a Defendant herein, FORD MOTOR COMPANY LLC ("FORD") is a corporation domiciled in Wilmington, Delaware; whose principal place of business is 1209 Orange Street, Wilmington, DE 19801; and whose registered agent for service in Louisiana is CT Corporation System, 3867 Plaza Tower Dr., Baton Rouge, LA 70816.

3.

Defendant, FORD MOTOR COMPANY LLC, is the manufacturer, distributor, supplier, wholesaler, retailer, parent company, subsidiary and affiliated company who is believed to be an entity who may have been involved in the manufacture, sale, marketing or distribution of the 2015 Ford Explorer that is the subject of this lawsuit; or who have merged with and/or acquired any or all of the

aforesaid entity and/or their assets and obligations since the subject vehicle's manufacture.

4.

FORD MOTOR COMPANY LLC, parent companies, subsidiaries, affiliated companies are also entities who may own or be owned by the defendant, FORD MOTOR COMPANY LLC, or who may have played a role in the manufacture, sale, or distribution of the subject 2015 Ford Explorer and/or its component parts, and/or who have merged with and/or acquired any or all of the aforesaid entities and/or their assets and obligations since the subject vehicle's manufacture. The actual names, addresses, identities, corporate affiliations and/or relationships of the aforesaid entities are not currently known, despite due diligence to ascertain the same.

5.

Petitioner herein purchased a Ford vehicle from the local Ford dealership, COURTESY FORD LINCOLN, made a defendant herein.

6.

Petitioner herein purchased a Ford Explorer on March 30, 2015 bearing VIN 1FMSK7D8XFGC14675.

7.

Petitioner herein has continuously had problems with the exhaust system in the Ford and has returned it to the dealership on numerous occasions and despite their best efforts the dealership has been unable to repair the problem with the vehicle.

8.

Petitioner herein received personal injury and was required to seek medical attention for her injuries as a result of the defective exhaust system herein sued upon.

9.

Petitioner herein has suffered mental anguish and inconvenience as a result of the vehicle purchased herein being unfit for the intended use.

10.

The vehicle purchased is a lemon and is not fit for the purpose for which it was intended and has caused the plaintiff substantial problems since the purchase of the Ford Explorer.

11.

Petitioner herein has returned the Ford Explorer for the same problem on at least six (6) occasions, has talked to the local dealership, and to the district dealership of Ford Corporation all to no avail.

12.

Petitioner herein is entitled to penalties and attorney fees for the defendant's failure to repair, replace, or refund the purchase price of the Ford vehicle purchased.

13.

The purchase price of the Ford was \$35,329.00 and petitioners herein are entitled to the purchase price, all penalties and attorney fees as provided by Louisiana Revised Statutes regarding defective vehicles, redhibition, and the Lemon Law of the State of Louisiana.

WHEREFORE PLAINTIFF PRAYS that the Defendants herein be served and cited with this Complaint in accordance with law, they provide an answer thereto; and that after due proceedings are had there be judgment herein in favor of Plaintiff awarding her the refund of purchase price of the vehicle and for all damages for which petitioner is entitled including personal injury, mental anguish, and all other damages together with all court costs, penalties and attorney fees and any exemplary damages that Plaintiff may be entitled to under the laws of the State of Louisiana, together with legal interest on all amounts awarded, to be assessed from the date of judicial demand until paid for the damages for the purchase of the defective and lemon vehicle.

ATTORNEY FOR PETITIONER:



JACQUES P. SOILEAU (#29677)
W. GLENN SOILEAU (#12249)
219 W. Bridge Street
P.O. Box 344
Breux Bridge, LA 70717
Phone: (337) 332-4561
Fax: (337) 332-4562

PLEASE SERVE:
FORD MOTOR COMPANY
Through agent:
The CT Corporation System
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

ST MARTIN PARISH ACQUISITIONS, LLC
DBA - COURTESY FORD LINCOLN
Through Agent:
Don P. Hargroder
4750 Johnston Street
Lafayette, LA 70503

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Kristie Prejean
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ST. MARTIN PARISH

- The title, vehicle registration, and bill of sale;
- Color photographs of the vehicle, including other property, if any, that was damaged (please include the last 6 digits of the VIN on the back of each photo);
- A police and/or fire report related to the incident;
- Written verification from your insurance company that it is not paying for the same loss;
- Any repair estimate, invoice or receipts for which you are seeking reimbursement; and
- Documents indicating the vehicle service history.

Physical Injury Medical Information:

Because you have alleged an injury related to this incident, Ford is required to provide the information requested below to Medicare:

- a. Full Legal Name: Marlene Courville
- b. Gender: Female
- c. DOB: 11/30/1970
- d. Social Security# or Medicare HICN #: 437-55-6594

Please also provide:

- Medical records and bills related to treatment for medical injuries caused by the incident.

Providing Necessary Information

Thank you for bringing this claim to our attention. So that we can adequately review your claim, please provide the requested information within 90 days, or we will assume that you are not interested in pursuing a claim and will close our file.

Sincerely,



Alma Taylor
Legal Analyst- OGC Product Claims
Email: ataylor29@ford.com
Phone: 313 390-7952
Fax: 888 683-9898