

STATE OF CALIFORNIA  
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

**MULTIDISCIPLINARY ACCIDENT INVESTIGATION TEAM NARRATIVE/DIAGRAM**

CHP 558D (Rev. 9-08) OPI 065 (MAIT use only)

DATE OF COLLISION (MONTH-DAY-YEAR)	TIME (2400)	NCIC	OFFICER I.D. NUMBER	MAIT CASE NUMBER	PAGE
05-13-2017	0818	9465	18410	[REDACTED]	244

**ANALYSIS AND OPINION**

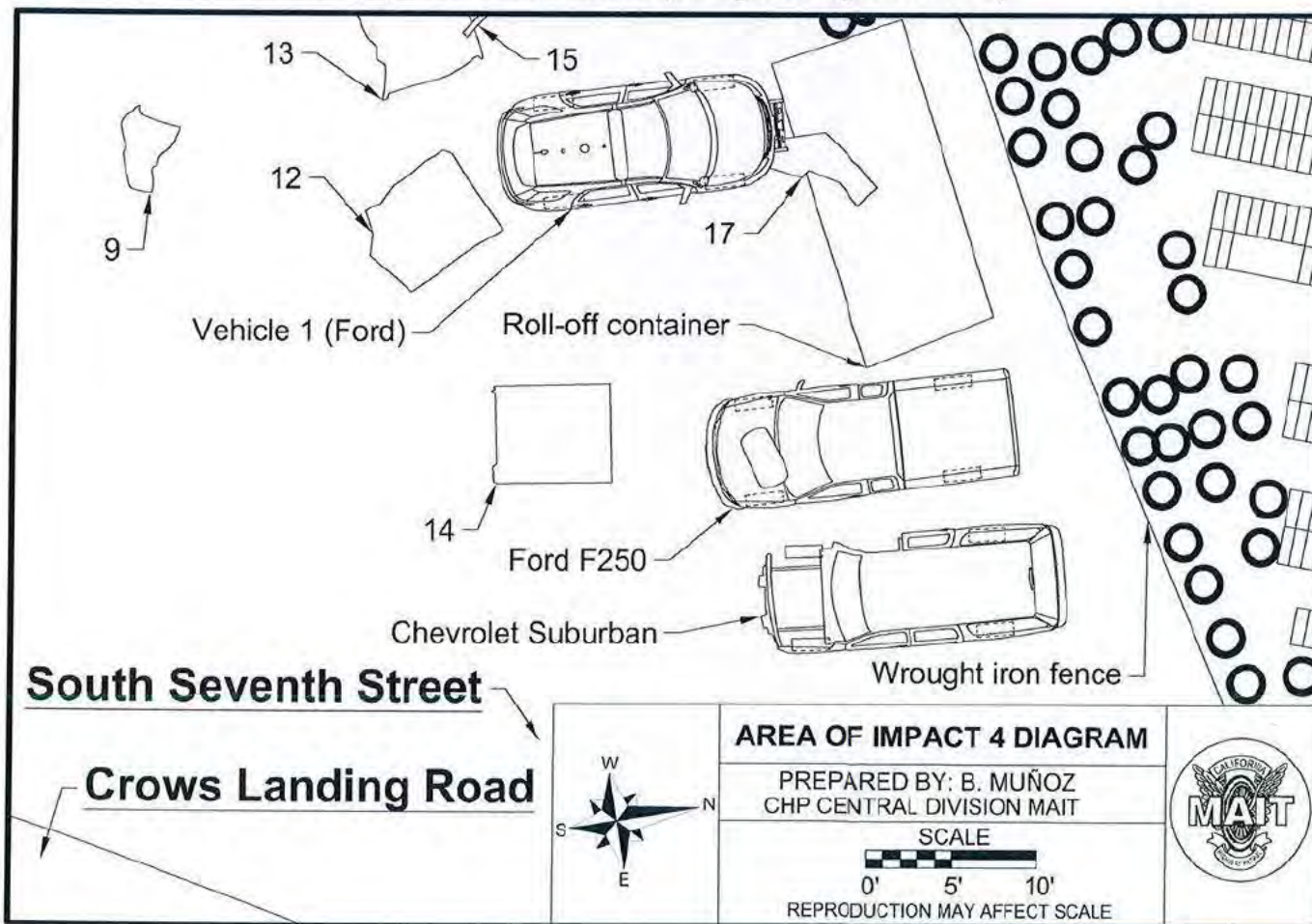
**AREAS OF IMPACT**

**AREA OF IMPACT 4: VEHICLE 1 (FORD) AND ORANGE METAL BIN VERSUS ROLL-OFF CONTAINER**

The area where the undercarriage of Vehicle 1 (Ford) and the orange metal bin struck the roll-off container causing the roll-off container to rotate clockwise and collide with the wrought iron fence was located approximately 57 west of the west pavement edge of Crows Landing Road, and 243 feet south of the south roadway edge prolongation of South Seventh Street. This area of impact corresponds with the coordinates 7.689 East and -92.201 North.

The area of impact was determined by the following:

1. The damage to Vehicle 1 (Ford).
2. The location of physical evidence item 17 (damaged orange metal bin).
3. The location of physical evidence item 18 (damaged roll-off container).
4. The AVL analysis.
5. The dynamics analysis.
6. The location of physical evidence item 20 (damaged wrought iron fence).



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**CONCLUSIONS**

**FINDINGS**

**ENVIRONMENTAL FACTORS**

The following conclusions were made as a result of the environmental factors investigation:

- The posted speed limit for Crows Landing Road from State Route 99 to south of South Seventh Street was 35 miles per hour.
- Visibility at the time of the collision was clear.
- The roadway was straight and flat, with no line of sight restrictions in the area of the collision.
- There were no weather related issues which could have contributed to this collision.
- The roadway was dry and in good condition.

**HUMAN FACTORS**

**Party 1** ([REDACTED] [REDACTED])

The following conclusions were made as a result of the human factors investigation of Party 1

([REDACTED] [REDACTED])

- Party 1 ([REDACTED] [REDACTED]) drove Vehicle 1 (Ford) in full law enforcement uniform and was wearing his seat belt at the time of the collision.
- Party 1 ([REDACTED] [REDACTED]) was a law enforcement officer who has attended several training courses in Emergency Vehicle Operations. The latest training he attended was on Friday, February 3, 2017.
- Party 1 ([REDACTED] [REDACTED]) was en route to a residential burglary call which occurred the day before the collision.
- Party 1 ([REDACTED] [REDACTED]) accelerated Vehicle 1 (Ford) to a top speed of 89 miles per hour while traveling north on Crows Landing Road up to the collision.
- Based on statements and the video analysis, Party 1 ([REDACTED] [REDACTED]) did not activate the overhead emergency lights or siren of Vehicle 1 (Ford) prior to the collision.
- Party 1 ([REDACTED] [REDACTED]) was prescribed Alprazolam (a generic medication of Xanax) for anxiety and Famotidine (a generic medication of Pepcid) for gastroesophageal reflux disease at the time of the collision. The prescription for the Alprazolam was to take one 0.25 mg tablet a day as needed.

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**CONCLUSIONS**

**FINDINGS**

**HUMAN FACTORS**

**Party 1 ( [REDACTED] [REDACTED] ) (continued)**

- Party 1 ( [REDACTED] [REDACTED] ) had an enlarged heart due to left ventricular wall hypertrophy. A sudden acute cardiac event as one of the considerations for the cause of this collision could not be ruled out by the Stanislaus County Sheriff's Department – Coroner's Division.
- After the autopsy, a neuropathology report was conducted on the brain of Party 1 ( [REDACTED] [REDACTED] ). The examination of the brain found no indication of seizures.
- Party 1 ( [REDACTED] [REDACTED] ) had a family history of heart disease.
- Party 1 ( [REDACTED] [REDACTED] ) had two additional sources of employment at the time of the collision.
- Party 1 ( [REDACTED] [REDACTED] ) suffered from symptoms related to anxiety, GERD, and experienced lifestyle stressors in the weeks leading up to the collision.
- Party 1 ( [REDACTED] [REDACTED] ) suffered from "panic attacks," with the most recent episode occurring the day before the collision.
- There was a history of witnessed physical episodes in which Party 1 ( [REDACTED] [REDACTED] ) would become less than attentive to his surroundings, one of which occurred while during driving a motor vehicle.
- Party 1 ( [REDACTED] [REDACTED] ) sustained fatal blunt injuries as a result of this collision, and succumbed to his injuries at the scene at 0835 hours.
- The toxicology report showed no presence of alcohol or drugs in Party 1's ( [REDACTED] [REDACTED] ) blood.
- Party 1 ( [REDACTED] [REDACTED] ) based on witness statements, had medical issues which affected his safe operation of a motor vehicle. There was no evidence to suggest, within the scope of this investigation, if Party 1 ( [REDACTED] [REDACTED] ) notified the DMV or Stanislaus County Sheriff's Department of medical issues which could have affected his driving.

**Passenger CSO Johnson**

- Passenger CSO Johnson was seated in the right front seat of Vehicle 1 (Ford) and was wearing her seat belt at the time of the collision.
- Passenger CSO Johnson sustained fatal blunt injuries as a result of this collision, and succumbed to her injuries at the scene at 0835 hours.

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05-13-2017	0818	9465	18410			247

**CONCLUSIONS**

**FINDINGS**

**VEHICLE FACTORS**

**Vehicle 1 (Ford)**

The following conclusions were made as a result of the vehicle factors investigation of Vehicle 1 (Ford):

- Vehicle 1 (Ford) sustained major front end damage and subsequent vehicle fire damage.
- There were no safety recalls that pertained to Vehicle 1 (Ford).
- The mechanical inspection revealed no pre-existing conditions which would have affected the overall pre-collision functionality of Vehicle 1 (Ford) upon a highway.
- The mechanical inspection and functional testing of Vehicle 1 (Ford) revealed the service brakes, the steering system, the throttle system, and the powertrain were fully functional.
- The inspection of the driver and right front passenger seat belts indicated the seat belts were worn at the time of the collision.
- The AVL data indicated Vehicle 1 (Ford) achieved a speed of 89 miles per hour while traveling north on Crows Landing Road prior to the collision.
- The AVL data indicated the time from when Vehicle 1 (Ford) was stopped on the right shoulder of Crows Landing Road south of Pecos Avenue to the time when the vehicle arrived at the collision scene was approximately 52 seconds.
- The AVL data indicated the distance traveled from the location where Vehicle 1 (Ford) was stopped on the right shoulder of Crows Landing Road south of Pecos Avenue to the collision scene was approximately 2,773 feet.
- Vehicle 1 (Ford) was traveling at a speed between 78 and 89 miles per hour in the five seconds preceding the collision.
- The ACM data indicated the driver and right front passenger seat belts were buckled.
- The ACM data indicated the accelerator pedal was fully depressed (100% full) and the brakes of Vehicle 1 (Ford) were not depressed during the five seconds preceding the collision.
- The ACM data indicated the steering wheel was turned to the right, and then to the left in a manner similar to a lane change maneuver, followed by a relatively straight course of travel in the five seconds preceding the collision.

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**CONCLUSIONS**

**FINDINGS**

**VEHICLE FACTORS**

**Vehicle 1 (Ford) (continued)**

- As a result of the collision, the driver's steering wheel mounted airbag, front passenger dash mounted airbag, driver's under dash knee bolster airbag, and right front under dash knee bolster airbag deployed. The driver's seat mounted side airbag, right front seat mounted side airbag, driver's seatbelt pre-tensioner, right front passenger seatbelt pre-tensioner, left side curtain/roof rail airbag, and right side curtain/roof rail airbag were commanded to deploy during this collision.
- Ford Motor Company representatives were involved in the examination of Vehicle 1 (Ford), and subsequent correspondence indicated there were no obvious mechanical issues with the steering, throttle or brake systems of the vehicle.
- There was an incident of a "sticking throttle" on Vehicle 1 (Ford) which occurred before this collision. This incident was not reported to the Stanislaus County Sheriff's Department until after this collision.
- In the event of a "stuck throttle," the condition of the brake system of Vehicle 1 (Ford) was such that an attentive driver could have brought the vehicle to a stop. There was no evidence of a pre-collision braking action of the part of Party 1's ( ), nor was there evidence of thermal loading to the brake components of Vehicle 1 (Ford) from a significant and prolonged brake application.
- During one of the four ignition cycles at- or post collision, the throttle body's internal gears sustained thermal damage resulting in the throttle plate being stuck in an open position.
- Party 1's ( ) departmentally issued rifle was released from its electromechanical lock during the collision sequence. The methodology by which this occurred is unknown, however the electromechanical lock was disfigured from contact with an automatic transmission during the collision sequence. Additionally, an unknown item may have activated the rifle release button during the collision sequence.

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**CONCLUSIONS**

**CAUSE**

**PRIMARY CAUSE**

The primary cause of this collision is "Other than Driver." The totality of the evidence suggests Party 1 ( [REDACTED] [REDACTED] ) suffered a health related condition that rendered him incapable of cognitively controlling a motor vehicle. This conclusion was based on the following:

- Party 1 ( [REDACTED] [REDACTED] ) was responding to a non-emergency, burglary call from Stanislaus County Sheriff Department Headquarters prior to the collision, a relatively routine event, and he was operating Vehicle 1 (Ford) in a routine manner after leaving Stanislaus County Sheriff's Department Headquarters on the day of the collision.
- Party 1 ( [REDACTED] [REDACTED] ) pulled Vehicle 1 (Ford) to the right shoulder of Crows Landing Road south of Pecos Avenue for approximately 18 seconds. The driver's door was opened during this time. The reason for this action is unknown.
- Following the stop, Party 1 ( [REDACTED] [REDACTED] ) accelerated Vehicle 1 (Ford) into the northbound lane of Crows Landing Road and crossed into the southbound lane at the State Route 99 overcrossing to the left of double parallel solid yellow lines (traveling the wrong way) at a calculated speed of 65 miles per hour in a posted 35 mile per hour speed zone.
- Party 1 ( [REDACTED] [REDACTED] ) turned Vehicle 1 (Ford) to the right and continued to travel north at a calculated speed of 65 miles per hour.
- Party 1 ( [REDACTED] [REDACTED] ) had medically diagnosed anxiety and additional stressors for which he was taking prescribed medication (Alprazolam and Famotidine). None of these medications were found in the toxicology report.
- Witness 9's ( [REDACTED] ) statement of observing Party 1 ( [REDACTED] [REDACTED] ) having prior episodes that resulted in incapacitation, one of which occurred while he was operating a motor vehicle.
- Party 1 ( [REDACTED] [REDACTED] ) had an enlarged heart due to left ventricular wall hypertrophy. A sudden acute cardiac event as one of the considerations for the cause of this collision could not be ruled out by the Stanislaus County Sheriff's Department – Coroner's Division.
- There was a sufficient time element prior to the collision where Party 1 ( [REDACTED] [REDACTED] ) if he was not in an incapacitated state, could have articulated the transmission gear shift lever into a neutral position, performed a steering maneuver, or depressed the brake pedal to alter the course of travel of Vehicle 1 (Ford) to avoid a collision. There was no evidence to suggest any of these actions were taken Party 1 ( [REDACTED] [REDACTED] )

# **ANNEX A**

IMPORTANT NOTICE: Robert Bosch LLC and the manufacturers whose vehicles are accessible using the CDR System urge end users to use the latest production release of the Crash Data Retrieval system software when viewing, printing or exporting any retrieved data from within the CDR program. Using the latest version of the CDR software is the best way to ensure that retrieved data has been translated using the most current information provided by the manufacturers of the vehicles supported by this product.

### CDR File Information

User Entered VIN	1FM5K8AR0EG [REDACTED]
User	R. Shaw
Case Number	[REDACTED]
EDR Data Imaging Date	05/18/2017
Crash Date	05/13/2017
Filename	1FM5K8AR0EG [REDACTED]_ACM.CDRX
Saved on	Thursday, May 18 2017 at 11:34:19
Imaged with CDR version	Crash Data Retrieval Tool 17.3
Imaged with Software Licensed to (Company Name)	California Highway Patrol
Reported with CDR version	Crash Data Retrieval Tool 17.3
Reported with Software Licensed to (Company Name)	California Highway Patrol
EDR Device Type	Airbag Control Module
ACM Adapter Detected During Download	Yes
Event(s) recovered	locked frontal event

### Comments

Direct to module with adapter number F00K108387 and cable number F00K108783. Image with written permission from Stanislaus County Sheriff's Department. Officers Shaw and Munoz present. At E-Towing in Modesto, CA. AC power to adapter.

### Data Limitations

#### Data Imaging:

**CAUTION:** When imaging data directly from the RCM on a bench top, make sure the RCM is placed on a flat surface without any movement (static) while connected to and powered by the CDR interface. Not following the above guideline for bench top imaging could risk inducing new events to be recorded in the RCM and possibly overwriting a Non airbag deployment.

Note that the RCM Adapter Detected during Download parameter equal to "Yes" indicates that the EDR data was collected directly from the RCM. When equal to "No", it indicates that the EDR data was collected through the OBD II from the vehicle.

#### Restraints Control Module (RCM) Recorded Crash Event(s):

The RCM can store up to two crash events. Event types are categorized as follow:

1. Non deployment trigger event is an event in which EDR recording trigger threshold is met or exceeded (minimum of 5 mph (8kph) Accumulated Delta Velocity within 150ms interval), but no device(s) have deployed. The data from such event can be overwritten by subsequent events.
2. Airbag deployment event is an event in which frontal, side or curtain airbags have deployed. Note that such event cannot be overwritten or cleared from the Restraints Control Module (RCM). Once the RCM has deployed any airbag device(s), the RCM must be replaced.
3. Some RCM may also categorize Non airbag deployment event. This type is an event in which non airbag devices such as pretensioners, knee bolster etc... have deployed. Note that such event can be overwritten given a subsequent "deployment" event.

"Time zero" or Event Beginning of any event (First Record or Second Record) is defined as the first Algorithm wake up during that event. So all the Pre-Crash, At Event, Delta V Data, deployment times etc... are relative to "Time zero".

It is possible that conditions in a crash may result in an incomplete event data record.

**EDR Data Elements Overview/Interpretation in CDR Report:**

**Under CDR File Information Section**

- **Event(s) recovered** indicates if an event was detected and recorded by RCM. If no event is detected, it will indicate "none". If a trigger or non airbag deployment event is detected, it will indicate "unlocked event". If an airbag deployment is detected, it will indicate "locked frontal event", or "locked side event", or "locked rollover event".

**Under System Status at Event Section**

- **Complete file recorded** indicates if data from the recorded event has been fully written to the RCM memory.
- If the RCM detected a **peripheral crash sensor was lost during an event**, the crash sensor would be identified as well as the time it was lost during that event relative to Time zero. If no loss of a peripheral crash sensor, nothing would be displayed. Note in some vehicles, loss of a peripheral crash sensor may lead to the loss of another peripheral crash sensor due to shared communication.

**Under Deployment Data Section**

- If the RCM commanded a deployment during an event, **the deployment device(s)** would be identified as well as the time the RCM commanded its deployment relative to Time zero. If no device was commanded to deploy by the RCM, nothing (no deployment device(s)) would be displayed.

**Under Pre-Crash Data -5 to 0 sec**

- **Steering Wheel Angle** if Applicable: positive value indicates left turn, and negative value would indicate right turn.
- **Stability Control Lateral Acceleration** if Applicable: Lateral Acceleration (Y-direction) is the acceleration along the lateral axis of the vehicle, reported as positive when accelerating to the left.
- **Stability Control Longitudinal Acceleration** if Applicable: Longitudinal Acceleration (X-direction) is the acceleration along the longitudinal axis of the vehicle, reported as positive when accelerating in a forward direction.
- **Stability Control Yaw Rate** if Applicable: The Yaw Axis is the vertical axis of the vehicle, generally perpendicular to the plane of the road. A positive Yaw Rate is counter-clockwise when observing the vehicle from above.
- **Stability Control Roll Rate** if Applicable: The Roll Axis is the longitudinal axis of the vehicle, generally aligned with the primary axis of motion of the vehicle. A positive Roll Rate is counter-clockwise when observing the vehicle from the front.

**Under Longitudinal Crash Pulse**

- **Delta-V longitudinal**: SAE J211 sign convention, negative value generally indicates a front crash and positive value generally indicates a rear crash. Longitudinal delta-V reflects the change in forward velocity that the sensing system experienced from Time zero. It is not the speed the vehicle was traveling before the event. Note that the vehicle speed is recorded separately. This data should be examined in conjunction with other available physical evidence from the vehicle and scene when assessing occupant or vehicle longitudinal delta-V.

**Under Lateral Crash Pulse**

- **Delta-V lateral**: SAE J211 sign convention, Positive value generally indicates a driver side crash and negative value generally indicates a passenger side crash.

**Under Rollover Sensor Data (if Applicable)**

- **Vehicle roll angle** if applicable: The Roll Axis is the longitudinal axis of the vehicle, generally aligned with the primary axis of motion of the vehicle. A positive Roll Angle is counter-clockwise when observing the vehicle from the front.

**Data Sources:**

The Restraints Control Module (RCM) contains all recorded data on any event. Data collected from the RCM comes from multiple sources:

1. Internal to the RCM such as internal sensors for delta Velocity data, rollover angle data if applicable, etc... which are measured, calculated and stored internally.
2. External to the RCM but with a direct connection such as buckle switches, peripheral crash sensors, seat track switch(s) etc... which are measured, calculated and stored internally.
3. External Modules to the RCM such as Powertrain Control Module, Brake Control Module, etc... These modules

communicate to the RCM via Vehicle Communication Network. The RCM stores the received data internally.

02010\_RCM-RC7\_r001

### System Status at Time of Retrieval

VIN As Programmed into RCM at Factory	1F5K8AR0EC [REDACTED]
Current VIN from PCM	1F5K8AR0EC [REDACTED]
Ignition Cycle, Download (First Record)	3,188
Ignition Cycle, Download (Second Record)	N/A
Restraints Control Module Part Number	DB5T-14B321-AG
Restraints Control Module Serial Number	7070322100000000
Restraints Control Module Software Part Number (Version)	DG13-14C028-AF
Driver Side/Center Frontal Restraints Sensor Serial Number	0022282B
Driver, Row 1, Side Restraint Sensor 1 Serial Number	00000098
Driver, Row 2, Side Restraint Sensor 2 Serial Number	000A282B
Passenger Frontal Restraints Sensor Serial Number	00BD117E
Passenger, Row 1, Side Restraint Sensor 1 Serial Number	00000027
Passenger, Row 2, Side Restraint Sensor 2 Serial Number	001E282C

### System Status at Event (First Record)

Recording Status	Record Locked
Complete File Recorded (Yes, No)	Yes
Multi-Event, Number of Events	1
Time From Event 1 to 2 (msec)	N/A
Lifetime Operating Timer at Event Time Zero (sec)	36,740,405
Key-On Timer at Event Time Zero (sec)	4,585
Vehicle Voltage at Time Zero (V)	14.256
Energy Reserve Mode Entered During Event (Yes, No)	Yes
Time Driver Side/Center Frontal Restraints Sensor Lost Relative to Time Zero (msec)	1,286.0
Time Front Passenger Restraint Sensor Lost Relative to Time Zero (msec)	1,460.0
Time Row 1 Driver Side Restraint Sensor Lost Relative to Time zero (msec)	1,459.5
Time Row 1 Passenger Side Restraint Sensor Lost Relative to Time Zero (msec)	1,459.5
Time Row 2 Driver Side Restraint Sensor Lost Relative to Time Zero (msec)	1,459.5
Time Row 2 Passenger Side Restraint Sensor Lost Relative to Time Zero (msec)	1,459.5

**Faults Present at Start of Event (First Record)**

No Faults Recorded

**Deployment Data (First Record)**

Frontal Airbag Deployment, Time to First Stage Deployment, Driver (msec)	1,252.5
Frontal Airbag Deployment, Time to 2nd Stage, Driver (msec)	1,402.5
Side Curtain Airbag Deployment, Time to Deploy, Driver Side (msec)	1,252.5
Side (Thorax) Air Bag Deployment, Time to Deploy, Driver (msec)	1,252.5
Pretensioner (Retractor) Deployment, Time to Fire, Driver (msec)	1,252.5
Pretensioner (Anchor) Deployment, Time to Fire, Driver (msec)	1,257.5
Frontal Airbag Deployment, Time to First Stage Deployment, Front Passenger (msec)	1,252.5
Frontal Airbag Deployment, Time to 2nd Stage, Front Passenger (msec)	1,402.5
Pretensioner (Retractor) Deployment, Time to Fire, Right Front Passenger (msec)	1,252.5
Pretensioner (Anchor) Deployment, Time to Fire, Right Front Passenger (msec)	1,257.5
Adaptive Steering Column Deployment, Time to Deploy, Driver (msec)	1,252.5
Inflatable Knee Bolster Deployment, Time to Fire, Passenger (msec)	1,252.5
Cannister Vent Deployment, Time to Fire, Passenger (msec)	1,252.5
Maximum Delta-V, Longitudinal (MPH [km/h])	-0.05 [-0.08]
Time, Maximum Delta-V Longitudinal (msec)	67
Maximum Delta-V, Lateral (MPH [km/h])	-2.44 [-3.92]
Time, Maximum Delta-V Lateral (msec)	300
Driver or Center, Front Satellite Sensor, Discriminating Deployment	Yes
Driver or Center, Front Satellite Sensor, Safing	Yes
Passenger, Front Satellite Sensor, Discriminating Deployment	Yes
Passenger, Front Satellite Sensor, Safing	Yes
RCM Front (Longitudinal), Discriminating Deployment	Yes
RCM Front (Longitudinal), Safing	Yes
Longitudinal Delta-V Time Zero Offset (msec)	3.5 ms
Lateral Delta-V Time Zero Offset (msec)	3.5 ms
Roll Angle Time Zero Offset (msec)	83.5 ms

**Pre-Crash Data -1 sec (First Record)**

Ignition Cycle, Crash	3,185
Frontal Air Bag Warning Lamp, On/Off	Off
Safety Belt Status, Driver	Buckled
Seat Track Position Switch, Foremost, Status, Driver	Not Forward
Safety Belt Status, Front Passenger	Buckled
Seat Track Position Switch, Foremost, Status, Front Passenger	Not Forward
Brake Telltale	Off
ABS Telltale	Off
ESC/TC Telltale	Off
ESC/TC Off Telltale	Default
Powertrain Wrench Telltale	Off
Powertrain Malfunction Indicator Lamp (MIL) Telltale	Off

**Pre-Crash Data -5 to 0 sec [2 samples/sec] (First Record, table 1 of 2)**

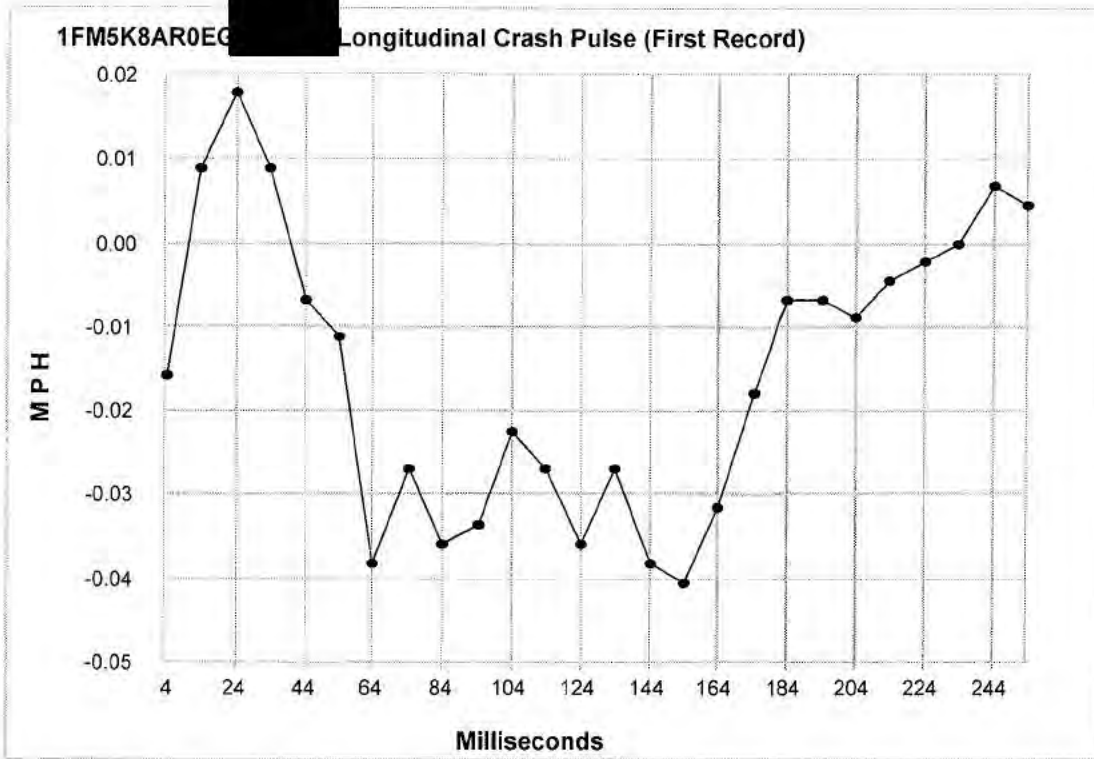
Times (sec)	Speed, Vehicle Indicated (MPH [km/h])	Accelerator Pedal, % Full	Service Brake, On/Off	Engine RPM	ABS Activity (Engaged, Non-Engaged)	Brake Powertrain Torque Request
- 5.0	78 [126]	100.0	Off	6,524	non-engaged	No
- 4.5	79 [127]	100.0	Off	6,530	non-engaged	Yes
- 4.0	79 [127]	100.0	Off	6,582	non-engaged	Yes
- 3.5	80 [129]	100.0	Off	6,662	non-engaged	No
- 3.0	81 [131]	100.0	Off	6,778	non-engaged	Yes
- 2.5	83 [133]	100.0	Off	5,768	non-engaged	No
- 2.0	85 [136]	100.0	Off	5,438	non-engaged	No
- 1.5	86 [138]	100.0	Off	5,482	non-engaged	No
- 1.0	87 [140]	100.0	Off	5,554	non-engaged	No
- 0.5	89 [143]	100.0	Off	5,662	non-engaged	No
0.0	89 [144]	100.0	Off	5,680	non-engaged	No

**Pre-Crash Data -5 to 0 sec [2 samples/sec] (First Record, table 2 of 2)**

Times (sec)	Driver Gear Selection	Traction Control via Brakes	Wheel Torque (Nm)	Occupant Size Classification, Front Passenger (Child Size Yes/No [Hex value])	Speed Control Telltale
- 5.0	Drive	non-engaged	1,912	No [\$08]	Off
- 4.5	Drive	non-engaged	1,900	No [\$08]	Off
- 4.0	Drive	non-engaged	1,892	No [\$08]	Off
- 3.5	Drive	non-engaged	1,868	No [\$08]	Off
- 3.0	Drive	non-engaged	1,824	No [\$08]	Off
- 2.5	Drive	non-engaged	992	No [\$08]	Off
- 2.0	Drive	non-engaged	1,708	No [\$08]	Off
- 1.5	Drive	non-engaged	1,680	No [\$08]	Off
- 1.0	Drive	non-engaged	1,680	No [\$08]	Off
- 0.5	Drive	non-engaged	1,660	No [\$08]	Off
0.0	Drive	non-engaged	1,624	No [\$08]	Off

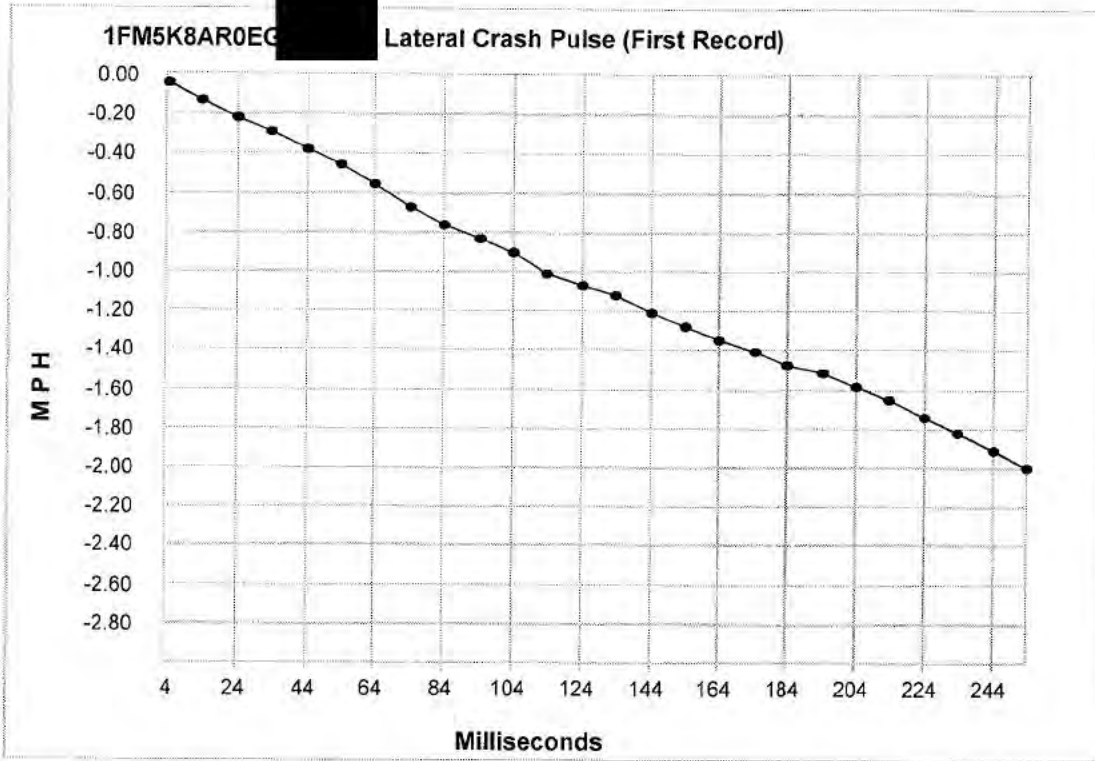
Pre-Crash Data -5 to 0 sec [10 samples/sec] (First Record)

Times (sec)	Steering Wheel Angle (degrees)	Stability Control Lateral Acceleration (g)	Stability Control Longitudinal Acceleration (g)	Stability Control Yaw Rate (deg/sec)	Stability Control Roll Rate (deg/sec)
-5.0	-52.6	-0.806	0.052	-12.63	-4.32
-4.9	-43.8	-0.738	0.063	-13.18	-2.2
-4.8	-39.1	-0.882	0.215	-13.31	1.04
-4.7	-41.3	-0.743	0.144	-12.0	-3.52
-4.6	-30.3	-0.89	0.027	-8.43	2.6
-4.5	-0.4	-0.671	0.234	-6.68	11.6
-4.4	18.3	-0.54	0.109	2.95	8.32
-4.3	14.5	-0.174	0.129	9.13	8.84
-4.2	25.6	0.195	-0.016	9.81	17.68
-4.1	33.9	0.324	0.052	10.77	14.76
-4.0	20.7	0.457	0.129	10.54	-2.56
-3.9	17.1	0.486	0.113	6.56	-1.64
-3.8	8.3	0.319	0.108	4.02	-2.64
-3.7	15.3	0.354	0.168	2.61	-4.76
-3.6	14.6	0.274	0.138	4.43	-2.44
-3.5	6.3	0.214	0.14	4.65	-3.84
-3.4	4.0	0.166	0.132	2.68	-1.16
-3.3	1.2	0.096	0.107	1.15	-0.32
-3.2	0.0	0.034	0.161	0.5	-1.4
-3.1	0.2	-0.025	0.14	0.52	0.2
-3.0	-7.8	-0.074	0.126	0.2	-1.24
-2.9	-3.8	-0.042	0.126	-1.61	-2.08
-2.8	-1.3	-0.111	0.128	-0.9	0.72
-2.7	0.2	-0.091	0.095	0.5	-0.24
-2.6	4.3	0.019	0.118	1.43	1.88
-2.5	6.8	0.064	0.159	2.47	2.44
-2.4	1.8	0.066	0.118	2.93	0.68
-2.3	0.3	0.088	0.126	1.5	-1.72
-2.2	0.0	0.054	0.156	0.31	-0.8
-2.1	-0.3	-0.031	0.115	0.38	-1.32
-2.0	0.1	-0.04	0.14	0.06	-1.48
-1.9	0.4	-0.006	0.121	0.9	0.68
-1.8	0.5	-0.01	0.134	1.38	0.44
-1.7	0.6	0.001	0.126	1.04	-1.04
-1.6	1.1	-0.006	0.105	0.75	-0.16
-1.5	0.3	0.013	0.135	0.77	0.56
-1.4	0.1	0.002	0.149	0.59	0.0
-1.3	0.0	-0.025	0.124	0.65	-0.28
-1.2	0.4	0.031	0.121	0.97	-3.04
-1.1	2.3	0.057	0.158	1.59	-6.28
-1.0	1.9	0.064	0.125	2.0	-2.32
-0.9	3.0	0.072	0.147	2.45	0.52
-0.8	3.6	0.11	0.076	3.56	-2.04
-0.7	6.1	0.113	0.07	3.56	-7.16
-0.6	3.1	0.147	0.117	2.29	16.08
-0.5	1.9	-0.105	0.084	3.38	2.44
-0.4	3.8	0.172	0.155	4.54	-0.36
-0.3	4.9	-0.067	0.131	4.56	5.64
-0.2	3.1	0.177	0.11	4.43	3.32
-0.1	2.0	-0.035	0.05	2.47	14.32
0.0	4.7	0.133	0.181	4.2	1.4



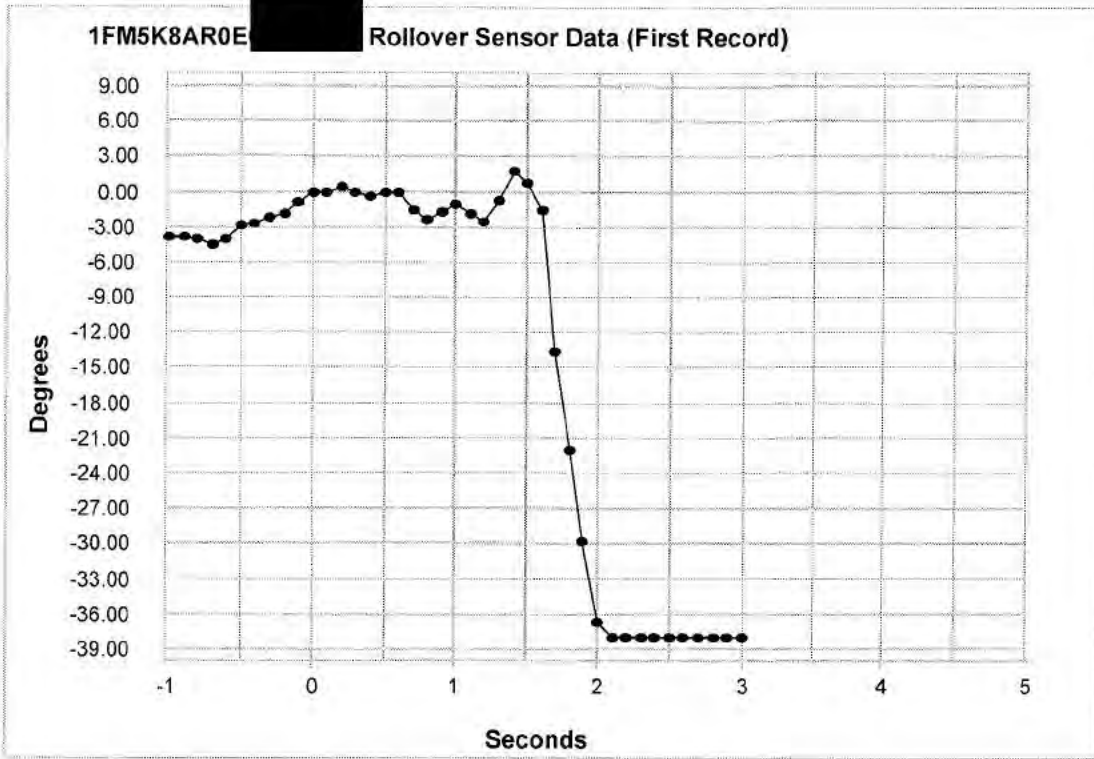
Longitudinal Crash Pulse (First Record)

Time (msec)	Delta-V, longitudinal (MPH)	Delta-V, longitudinal (km/h)
3.5	-0.02	-0.03
13.5	0.01	0.01
23.5	0.02	0.03
33.5	0.01	0.01
43.5	-0.01	-0.01
53.5	-0.01	-0.02
63.5	-0.04	-0.06
73.5	-0.03	-0.04
83.5	-0.04	-0.06
93.5	-0.03	-0.05
103.5	-0.02	-0.04
113.5	-0.03	-0.04
123.5	-0.04	-0.06
133.5	-0.03	-0.04
143.5	-0.04	-0.06
153.5	-0.04	-0.07
163.5	-0.03	-0.05
173.5	-0.02	-0.03
183.5	-0.01	-0.01
193.5	-0.01	-0.01
203.5	-0.01	-0.01
213.5	0.00	-0.01
223.5	0.00	0.00
233.5	0.00	0.00
243.5	0.01	0.01
253.5	0.00	0.01



**Lateral Crash Pulse (First Record)**

Time (msec)	Delta-V, lateral (MPH)	Delta-V, lateral (km/h)
3.5	-0.04	-0.07
13.5	-0.13	-0.21
23.5	-0.21	-0.34
33.5	-0.29	-0.46
43.5	-0.38	-0.60
53.5	-0.46	-0.74
63.5	-0.56	-0.90
73.5	-0.67	-1.08
83.5	-0.76	-1.23
93.5	-0.83	-1.34
103.5	-0.90	-1.45
113.5	-1.01	-1.63
123.5	-1.06	-1.71
133.5	-1.12	-1.81
143.5	-1.21	-1.94
153.5	-1.28	-2.06
163.5	-1.34	-2.16
173.5	-1.40	-2.26
183.5	-1.48	-2.38
193.5	-1.51	-2.43
203.5	-1.58	-2.55
213.5	-1.66	-2.66
223.5	-1.74	-2.80
233.5	-1.82	-2.92
243.5	-1.91	-3.08
253.5	-2.00	-3.22



**Rollover Sensor Data (First Record)**

Time (sec)	Vehicle Roll Angle (deg)	Time (sec)	Vehicle Roll Angle (deg)	Time (sec)	Vehicle Roll Angle (deg)
-1.0	-3.92	1.1	-1.85	3.2	N/A
-0.9	-3.94	1.2	-2.6	3.3	N/A
-0.8	-4.02	1.3	-0.64	3.4	N/A
-0.7	-4.55	1.4	1.79	3.5	N/A
-0.6	-3.99	1.5	0.83	3.6	N/A
-0.5	-2.88	1.6	-1.61	3.7	N/A
-0.4	-2.65	1.7	-13.55	3.8	N/A
-0.3	-2.2	1.8	-22.07	3.9	N/A
-0.2	-1.85	1.9	-29.71	4.0	N/A
-0.1	-0.91	2.0	-36.78	4.1	N/A
0.0	-0.12	2.1	-38.08	4.2	N/A
0.1	-0.01	2.2	-38.08	4.3	N/A
0.2	0.4	2.3	-38.08	4.4	N/A
0.3	-0.12	2.4	-38.08	4.5	N/A
0.4	-0.47	2.5	-38.08	4.6	N/A
0.5	-0.05	2.6	-38.08	4.7	N/A
0.6	0.0	2.7	-38.08	4.8	N/A
0.7	-1.5	2.8	-38.08	4.9	N/A
0.8	-2.41	2.9	-38.08	5.0	N/A
0.9	-1.79	3.0	-38.08		
1.0	-1.0	3.1	N/A		

## Hexadecimal Data

Data that the vehicle manufacturer has specified for data retrieval is shown in the hexadecimal data section of the CDR report. The hexadecimal data section of the CDR report may contain data that is not translated by the CDR program. The control module contains additional data that is not retrievable by the CDR system.

02 00 00 00

44 42 35 54 2D 31 34 42 33 32 31 2D 41 47 00 00 00 00 00 00 00 00 00 00

37 30 37 30 33 32 32 31 30 30 30 30 30 30 30

44 47 31 33 2D 31 34 43 30 32 38 2D 41 46 00 00 00 00 00 00 00 00 00

00 22 28 2B 4B 55 46 00 00 00 00 00 00 00 00

00 00 00 98 23 8A D0 00 00 00 00 00 00 00 00

00 0A 28 2B 4E 70 34 00 00 00 00 00 00 00 00

00 BD 11 76 EE 04 16 00 00 00 00 00 00 00 00

00 00 00 27 8A 4A D0 00 00 00 00 00 00 00 00

00 1E 28 2C 29 4B 26 00 00 00 00 00 00 00 00

31 46 4D 35 4B 38 41 52 30 45 47 41 36 35 33 30 37

31 46 4D 35 4B 38 41 52 30 45 47 41 36 35 33 30 37 00 00 00 00 00 00

67 68 CE 3B 10 0C 67 00

Event Record 1

71 0C 00 00 74 0C 00 00 71 1F 70 00 95 03 00 00 2A 00 00 00 88 F7 FF FF 48 35 01
00 84 4B 00 00 5A D8 FF FF C6 CA FE FF B0 CA FE FF A8 CA FE FF B0 CA FE FF BE CA
FE FF C2 CA FE FF DA CA FE FF D0 CA FE FF DA CA FE FF DC CA FE FF D4 CA FE FF C8 CA FE FF
CA FE FF D8 CA FE FF D0 CA FE FF DA CA FE FF DC CA FE FF D4 CA FE FF C8 CA FE FF
BE CA FE FF BE CA FE FF C0 CA FE FF BC CA FE FF BA CA FE FF B8 CA FE FF B2 CA FE
FF B4 CA FE FF 58 B4 FF FF 0A B4 FF FF BE B3 FF FF 7C B3 FF FF 2E B3 FF FF E4 B2
FF FF 8C B2 FF FF 28 B2 FF FF D4 B1 FF FF 98 B1 FF FF 5A B1 FF FF F6 B0 FF FF C8
B0 FF FF 94 B0 FF FF 48 B0 FF FF 08 B0 FF FF D0 AF FF FF 9C AF FF FF 5A AF FF FF
3A AF FF FF FC AE FF FF BA AE FF FF 6E AE FF FF 2A AE FF FF D6 AD FF FF 86 AD FF
FF 0E 15 2B 15 6F 14 E4 11 B9 0F 95 0F 1E 0F DE 0B 51 0F 19 16 7B 17 36 1A 55 1C
14 22 EF 26 92 27 10 2A EF 26 CF 24 56 27 A3 27 84 1E EA 18 BD 1C 8F 21 63 1C C5
17 B7 23 90 32 BB 2C CD 1D EE D4 EC A0 53 72 2B 47 3D 3F 3D 3F 3D 3F 3D 3F 3D 3F
3D 3F 3D 3F 3D 3F 2E 15 EB 13 08 14 1F 14 62 14 AD 15 A0 16 37 16 0D
16 DA 15 DD 14 9A 14 FC 14 F7 14 EF 14 00 15 86 3E 8B 3E 83 3E 81 3E 80 3E 84 3E
97 3E 93 3E 9E 3E A4 3E BD 3E 9F 3E 93 3E A6 3E B1 3E 9F 3E 94 3E AF 3E 72 3C CA
3C F9 3C E3 3C 51 3D 7C 3E 37 3F 11 3F 80 3F D3 3F 4F 3F 2B 3F D3 3E 19 3F 12 3F
BF 3E A8 3E 8C 3E 80 3E 82 3E 32 3E 5A 3E 73 3E 82 3E AB 3E C4 3E 92 3E 83 3E 80
3E 7D 3E 81 3E 84 3E 85 3E 4E 08 39 08 57 08 65 08 4C 08 49 08 6E 08 4D 08 63 08
1C 08 16 08 45 08 24 08 6B 08 53 08 3E 08 02 08 85 08 04 08 0F 08 A7 08 60 08 EB
07 BA 08 3D 08 51 08 C0 07 04 08 51 08 41 08 3C 08 78 08 5A 08 5C 08 54 08 3B 08
71 08 5C 08 4E 08 4E 08 50 08 2F 08 46 08 6F 08 46 08 4E 08 6C 08 43 08 5C 08 49
08 56 08 D1 07 CA 07 DD 07 D2 07 B7 07 EF 07 09 08 10 08 18 08 3E 08 41 08 63 08
67 07 7C 08 8D 07 81 08 AD 07 55 08 AA 04 EE 04 5E 04 E9 04 56 04 31 05 B4 05 22
07 93 08 14 09 99 09 B6 09 0F 09 32 09 E2 08 A6 08 76 08 30 08 F2 07 B7 07 86 07
A6 07 61 07 75 07 E3 07 10 08 12 08 28 08 06 08 B1 07 A8 07 CA 07 C6 07 B8 46 9B
46 9D 46 8B 46 91 46 B1 46 EF 46 18 47 45 47 B4 47 B4 47 35 47 A2 47 16 48 18 48
0B 48 47 47 F4 47 61 41 2A 41 1D 41 A0 41 05 43 B4 43 77 47 E1 49 25 4A 85 4A 6E
4A E0 48 E2 47 55 47 0B 48 21 48 5C 47 C3 46 82 46 84 46 64 46 AF 45 F6 45 82 46
DF 46 47 47 75 47 E6 46 6F 46 76 46 56 46 AA 46 DA 46 C8 74 20 75 68 75 30 75 14
75 00 74 BC 72 48 74 64 75 64 74 64 72 78 7B 24 76 0C 75 64 77 7C 76 C8 7A BC 75
80 73 54 74 98 75 D0 73 34 76 B8 79 70 78 A4 78 18 7C F4 7A 30 74 8C 74 28 74 54
73 3C 74 B0 73 BC 74 10 75 A4 74 44 75 B4 74 60 74 78 75 18 75 EC 75 24 76 74 75
84 74 E0 74 AC 74 9C 74 74 75 5C 75 C9 09 C9 09 C9 09 C9 09 F5 0A F5 0A C9 09 00
00 C9 09 00 00 D3 09 D3 09 00 00 C9 09 C9 09 C9 09 C9 09 00 00 C9 09 00 00 00
00 00
FF FF FF FF FF 05 05 FF FF 0C 0A FF FF 68 0B 67 0B 67 0B 67 0B 67 0B 67 0B 67
FF FF FF FF FF FF FF FF FF FF FF 00 00 FF FF FF FF FF FF FF FF FF FF FF FF FF
FF FF FF FF FF 86 00 58 02 00 0E 00 0E 07 00 07 00 A7 00 45 44 27 04 38 98 03 E8
0B 18 00 00 81 96 00 08 00 00 03 00 0F 45 44 26 D4 31 75 03 E8 0C BE 00 00 81 DE
00 08 00 00 03 00 0F 45 44 26 E0 31 D1 03 E8 0C C1 00 00 81 DB 00 00 00 03 00
0F 45 44 26 E0 31 F5 03 E8 0C DB 00 00 81 D9 00 08 00 00 03 00 0F 45 44 26 E0 32
9A 03 E8 0D 03 00 00 81 D3 00 08 00 00 03 00 0F 45 44 26 EC 33 67 03 E8 0D 3D 00
00 81 C8 00 08 00 00 03 00 0F 45 44 26 EC 34 46 03 E8 0B 44 00 00 80 F8 00 08 00
00 03 00 0F 45 44 26 F8 35 2F 03 E8 0A 9F 00 00 81 AB 00 08 00 03 00 0F 45 44
26 F8 35 F4 03 E8 0A B5 00 00 81 A4 00 08 00 00 03 00 0F 45 44 27 04 37 DC 03 E8 0B 0F 00 00 81 9F
0A D9 00 00 81 A4 00 08 00 00 03 00 0F 45 44 27 04 37 DC 03 E8 0B 0F 00 00 81 9F
00 08 00 00 03 00 0F 00 00 00 00 00 00 14 09 00 00 00 00 00 14 09 00 00 00 00
00 00 14 09 00 00 00 00 00 00 14 09 00 00 00 00 00 00 14 09 00 00 00 00 14
09 00 00 00 00 00 14 09 00 00 00 00 00 00 14 09 00 00 00 00 14 09 00 00 00
00 00 14 09 00 00 00 00 00 00 14 09 00 00 00 00 00 00 14 09 00 00 00 00 14
09 00 00 00 00 00 14 09 00 00 00 00 00 00 14 09 00 00 00 00 14 09 00 00 00
00 02 02 00 02 00
00 00
00 00
00 01 00 00 08 00 01 B0 00 00 00 01 12 04 02 0B 33 29 1A 1A 0B 08 00 FF FF FF FF
FF FF
FF FF
FF FF
FF FF
FF FF











# **ANNEX B**

Resource ID	Long	Lat	Altitude	Direction	Speed-KPH	Quality	Origin Time
6L2	-120.98903	37.58645	0	252	0	1	1 7:05:52
6L2	-120.98903	37.58645	0	252	0	1	1 7:06:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:07:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:08:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:09:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:10:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:11:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:12:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:13:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:14:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:15:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:16:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:17:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:18:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:19:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:20:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:21:50
6L2	-120.98903	37.58645	0	252	0	2	1 7:22:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:23:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:24:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:25:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:26:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:27:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:28:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:29:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:30:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:31:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:32:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:33:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:34:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:35:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:36:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:37:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:38:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:39:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:40:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:41:52
6L2	-120.98903	37.58645	0	252	0	2	1 7:42:50
6L2	-120.98903	37.58645	0	252	0	2	1 7:43:50
6L2	-120.98903	37.58645	0	252	0	2	1 7:44:50
6L2	-120.98903	37.58645	0	252	0	2	1 7:45:50
6L2	-120.98903	37.58645	0	252	0	2	1 7:46:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:47:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:48:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:49:51
6L2	-120.98903	37.58645	0	252	0	2	1 7:50:51

6L2	-120.98903	37.58645	0	252	0	2	1 7:51:51
6L2	-120.98897	37.58644	0	252	4	2	1 7:52:05
6L2	-120.98891	37.58641	0	145	8	1	1 7:52:12
6L2	-120.98882	37.58639	0	103	15	1	1 7:52:14
6L2	-120.98872	37.58638	0	103	14	2	1 7:52:16
6L2	-120.98866	37.58634	0	125	11	2	1 7:52:18
6L2	-120.98868	37.58634	0	125	0	2	1 7:52:25
6L2	-120.98874	37.58633	0	263	6	2	1 7:52:28
6L2	-120.9888	37.58632	0	263	0	2	1 7:52:33
6L2	-120.9888	37.58632	0	263	0	1	1 7:53:32
6L2	-120.9888	37.58632	0	263	0	1	1 7:54:32
6L2	-120.9888	37.58632	0	263	0	1	1 7:55:32
6L2	-120.9888	37.58632	0	263	0	1	1 7:56:32
6L2	-120.9888	37.58632	0	263	0	1	1 7:57:32
6L2	-120.9888	37.58632	0	263	0	1	1 7:58:32
6L2	-120.9888	37.58632	0	263	0	1	1 7:59:32
6L2	-120.9888	37.58632	0	263	0	1	1 8:00:32
6L2	-120.9888	37.58632	0	263	0	1	1 8:01:32
6L2	-120.98895	37.58636	0	263	0	1	1 8:01:52
6L2	-120.98898	37.58642	0	327	8	1	1 8:01:54
6L2	-120.98897	37.58652	0	353	20	1	1 8:01:56
6L2	-120.98894	37.58659	0	9	13	1	1 8:01:58
6L2	-120.98892	37.58664	0	19	2	1	1 8:02:01
6L2	-120.98893	37.58663	0	19	0	1	1 8:03:01
6L2	-120.98893	37.58663	0	19	0	1	1 8:04:01
6L2	-120.98893	37.58667	0	356	6	1	1 8:04:56
6L2	-120.98893	37.58676	0	359	18	1	1 8:04:58
6L2	-120.98891	37.58686	0	1	18	1	1 8:05:00
6L2	-120.98885	37.58691	0	64	11	1	1 8:05:02
6L2	-120.98881	37.58691	0	64	0	1	1 8:06:02
6L2	-120.98881	37.58691	0	64	0	2	1 8:07:01
6L2	-120.98881	37.58691	0	64	0	1	1 8:08:01
6L2	-120.98881	37.58691	0	64	0	1	1 8:09:01
6L2	-120.98881	37.58691	0	64	0	1	1 8:10:00
6L2	-120.98879	37.58687	0	64	4	1	1 8:10:43
6L2	-120.98871	37.58687	0	93	8	1	1 8:10:47
6L2	-120.98863	37.58686	0	90	8	1	1 8:10:50
6L2	-120.98856	37.58686	0	90	11	1	1 8:10:52
6L2	-120.98846	37.58686	0	88	10	1	1 8:10:55
6L2	-120.9884	37.58689	0	64	10	1	1 8:10:57
6L2	-120.98836	37.58694	0	25	12	1	1 8:10:59
6L2	-120.98835	37.58703	0	8	16	1	1 8:11:01
6L2	-120.98835	37.58712	0	359	17	1	1 8:11:03
6L2	-120.98834	37.5872	0	359	16	1	1 8:11:05
6L2	-120.98834	37.58726	0	355	12	1	1 8:11:07
6L2	-120.98838	37.58733	0	337	13	1	1 8:11:09
6L2	-120.98847	37.58736	0	279	16	1	1 8:11:11

6L2	-120.98857	37.58736	0	271	14	1	1 8:11:13
6L2	-120.98865	37.58736	0	270	11	1	1 8:11:15
6L2	-120.98871	37.58736	0	271	4	1	1 8:11:18
6L2	-120.98877	37.58738	0	308	8	1	1 8:11:22
6L2	-120.98888	37.58742	0	349	5	1	1 8:11:25
6L2	-120.98879	37.58746	0	349	3	1	1 8:11:45
6L2	-120.98888	37.58751	0	351	10	1	1 8:11:47
6L2	-120.98882	37.58758	0	330	11	1	1 8:11:50
6L2	-120.98889	37.58763	0	296	19	1	1 8:11:52
6L2	-120.98907	37.58766	0	279	32	1	1 8:11:54
6L2	-120.98953	37.58767	0	271	49	2	1 8:11:57
6L2	-120.98993	37.58767	0	270	61	2	1 8:11:59
6L2	-120.99037	37.58767	0	270	68	2	1 8:12:01
6L2	-120.99081	37.58767	0	270	68	2	1 8:12:03
6L2	-120.99125	37.58767	0	270	66	2	1 8:12:05
6L2	-120.99168	37.58767	0	270	66	2	1 8:12:07
6L2	-120.9921	37.58767	0	271	65	2	1 8:12:09
6L2	-120.99251	37.58768	0	271	63	2	1 8:12:11
6L2	-120.99271	37.58768	0	271	63	2	1 8:12:12
6L2	-120.99305	37.58768	0	270	48	2	1 8:12:14
6L2	-120.99331	37.58768	0	269	36	2	1 8:12:16
6L2	-120.99348	37.58768	0	268	29	2	1 8:12:18
6L2	-120.99353	37.58771	0	286	8	2	1 8:12:20
6L2	-120.99357	37.58776	0	327	16	2	1 8:12:22
6L2	-120.99359	37.58787	0	358	26	2	1 8:12:24
6L2	-120.99357	37.58807	0	0	42	2	1 8:12:26
6L2	-120.99357	37.58854	0	1	59	2	1 8:12:29
6L2	-120.99356	37.58899	0	359	76	2	1 8:12:31
6L2	-120.99356	37.58947	0	359	86	2	1 8:12:33
6L2	-120.99356	37.58994	0	0	89	2	1 8:12:35
6L2	-120.99356	37.5904	0	0	89	2	1 8:12:37
6L2	-120.99355	37.59085	0	0	88	2	1 8:12:39
6L2	-120.99355	37.59129	0	0	86	2	1 8:12:41
6L2	-120.99354	37.59171	0	0	83	2	1 8:12:43
6L2	-120.99354	37.59192	0	0	81	2	1 8:12:44
6L2	-120.99354	37.5923	0	0	73	2	1 8:12:46
6L2	-120.99354	37.59265	0	0	69	2	1 8:12:48
6L2	-120.99353	37.59296	0	0	58	2	1 8:12:50
6L2	-120.99353	37.59323	0	0	53	2	1 8:12:52
6L2	-120.99353	37.59349	0	0	50	2	1 8:12:54
6L2	-120.99353	37.59362	0	1	50	2	1 8:12:55
6L2	-120.99352	37.59387	0	359	54	2	1 8:12:57
6L2	-120.99354	37.59425	0	357	53	2	1 8:13:00
6L2	-120.99354	37.59444	0	358	42	2	1 8:13:02
6L2	-120.99355	37.5946	0	358	32	2	1 8:13:04
6L2	-120.99356	37.59471	0	358	25	2	1 8:13:06
6L2	-120.99356	37.59477	0	357	13	2	1 8:13:08

6L2	-120.99353	37.59482	0	4	8	2	1 8:14:05
6L2	-120.99353	37.59487	0	4	15	2	1 8:14:06
6L2	-120.99353	37.59504	0	1	30	2	1 8:14:08
6L2	-120.99353	37.59515	0	1	38	2	1 8:14:09
6L2	-120.99353	37.5954	0	0	53	2	1 8:14:11
6L2	-120.99353	37.59571	0	359	63	2	1 8:14:13
6L2	-120.99353	37.59605	0	359	66	2	1 8:14:15
6L2	-120.99353	37.59641	0	359	70	2	1 8:14:17
6L2	-120.99353	37.59677	0	0	71	2	1 8:14:19
6L2	-120.99354	37.59713	0	0	72	2	1 8:14:21
6L2	-120.99354	37.5975	0	0	72	2	1 8:14:23
6L2	-120.99353	37.59787	0	0	73	2	1 8:14:25
6L2	-120.99353	37.59824	0	1	73	2	1 8:14:27
6L2	-120.9935	37.59879	0	2	73	2	1 8:14:30
6L2	-120.99349	37.59916	0	1	73	2	1 8:14:32
6L2	-120.99349	37.59953	0	359	73	2	1 8:14:34
6L2	-120.99349	37.5999	0	0	74	2	1 8:14:36
6L2	-120.99349	37.60009	0	0	74	2	1 8:14:37
6L2	-120.99349	37.60046	0	0	74	2	1 8:14:39
6L2	-120.99349	37.60083	0	0	74	2	1 8:14:41
6L2	-120.9935	37.6012	0	359	74	2	1 8:14:43
6L2	-120.9935	37.60158	0	0	74	2	1 8:14:45
6L2	-120.9935	37.60195	0	359	74	2	1 8:14:47
6L2	-120.9935	37.60232	0	359	74	2	1 8:14:49
6L2	-120.9935	37.60269	0	0	72	2	1 8:14:51
6L2	-120.9935	37.60307	0	0	75	2	1 8:14:53
6L2	-120.9935	37.60344	0	359	73	2	1 8:14:55
6L2	-120.9935	37.60381	0	359	74	2	1 8:14:57
6L2	-120.9935	37.60419	0	0	76	2	1 8:14:59
6L2	-120.99349	37.60475	0	0	75	2	1 8:15:02
6L2	-120.99349	37.60512	0	0	73	2	1 8:15:04
6L2	-120.9935	37.60547	0	359	70	2	1 8:15:06
6L2	-120.99351	37.60582	0	358	70	2	1 8:15:08
6L2	-120.99352	37.60633	0	358	68	2	1 8:15:11
6L2	-120.99353	37.60667	0	359	66	2	1 8:15:13
6L2	-120.99353	37.60699	0	359	65	2	1 8:15:15
6L2	-120.99353	37.60715	0	0	61	2	1 8:15:16
6L2	-120.99353	37.60743	0	359	56	2	1 8:15:18
6L2	-120.99353	37.60768	0	359	48	2	1 8:15:20
6L2	-120.99354	37.6079	0	359	41	2	1 8:15:22
6L2	-120.99354	37.6081	0	359	40	2	1 8:15:24
6L2	-120.99354	37.60829	0	358	39	2	1 8:15:26
6L2	-120.99354	37.6085	0	0	46	2	1 8:15:28
6L2	-120.99353	37.60884	0	2	45	2	1 8:15:31
6L2	-120.99353	37.60903	0	359	38	2	1 8:15:33
6L2	-120.99353	37.60917	0	0	28	2	1 8:15:35
6L2	-120.99352	37.60924	0	0	15	2	1 8:15:37

6L2	-120.99351	37.60929	0	1	16	2	1 8:15:49
6L2	-120.99351	37.60941	0	1	23	2	1 8:15:51
6L2	-120.9935	37.60959	0	0	39	2	1 8:15:53
6L2	-120.9935	37.60981	0	0	45	2	1 8:15:55
6L2	-120.9935	37.61006	0	359	49	2	1 8:15:57
6L2	-120.99352	37.61048	0	358	56	2	1 8:16:00
6L2	-120.99353	37.61078	0	357	60	2	1 8:16:02
6L2	-120.99356	37.6111	0	357	63	2	1 8:16:04
6L2	-120.99357	37.61143	0	358	64	2	1 8:16:06
6L2	-120.99358	37.61177	0	359	66	2	1 8:16:08
6L2	-120.99359	37.61212	0	359	68	2	1 8:16:10
6L2	-120.99359	37.61244	0	359	65	2	1 8:16:12
6L2	-120.99359	37.61259	0	0	59	2	1 8:16:13
6L2	-120.99359	37.61289	0	0	58	2	1 8:16:15
6L2	-120.99359	37.61318	0	0	56	2	1 8:16:17
6L2	-120.99359	37.61346	0	359	53	2	1 8:16:19
6L2	-120.9936	37.61372	0	359	51	2	1 8:16:21
6L2	-120.9936	37.61399	0	359	57	2	1 8:16:23
6L2	-120.99359	37.61429	0	0	59	2	1 8:16:25
6L2	-120.99359	37.61459	0	0	59	2	1 8:16:27
6L2	-120.99358	37.61507	0	0	64	2	1 8:16:30
6L2	-120.99358	37.6154	0	0	65	2	1 8:16:32
6L2	-120.99356	37.61571	0	1	62	2	1 8:16:34
6L2	-120.99354	37.61595	0	5	49	2	1 8:16:36
6L2	-120.99351	37.61612	0	7	36	2	1 8:16:38
6L2	-120.9935	37.61623	0	2	24	2	1 8:16:40
6L2	-120.9935	37.61628	0	1	10	2	1 8:16:42
6L2	-120.99351	37.61638	0	358	20	2	1 8:17:00
6L2	-120.99351	37.61656	0	358	35	2	1 8:17:02
6L2	-120.99352	37.61679	0	358	45	2	1 8:17:04
6L2	-120.99354	37.61705	0	356	52	2	1 8:17:06
6L2	-120.99356	37.61733	0	356	56	2	1 8:17:08
6L2	-120.99358	37.61763	0	357	58	2	1 8:17:10
6L2	-120.99359	37.61794	0	357	60	2	1 8:17:12
6L2	-120.9936	37.6181	0	356	63	2	1 8:17:13
6L2	-120.99364	37.61862	0	358	74	2	1 8:17:16
6L2	-120.99363	37.61904	0	1	80	2	1 8:17:18
6L2	-120.99364	37.61929	0	358	93	2	1 8:17:19
6L2	-120.99361	37.61982	0	359	100	2	1 8:17:21
6L2	-120.99359	37.62038	0	1	106	2	1 8:17:23
6L2	-120.99356	37.62094	0	2	106	2	1 8:17:25
6L2	-120.99355	37.62151	0	358	115	2	1 8:17:27
6L2	-120.99357	37.62215	0	357	123	2	1 8:17:29
6L2	-120.9936	37.62315	0	359	132	2	1 8:17:32
6L2	-120.99365	37.62389	0	357	140	1	1 8:17:34
6L2	-120.99365	37.62444	0	357	143	1	1 8:17:36
6L2	-120.99358	37.62505	0	359	138	1	1 8:17:38

6L2	-120.99343	37.62557	0	7	131	1	1 8:17:40
6L2	-120.99375	37.62531	0	349	59	1	1 8:17:42
6L2	-120.99389	37.62494	0	282	6	1	1 8:17:44
6L2	-120.99392	37.62472	0	282	1	2	1 8:17:46
6L2	-120.9939	37.62466	0	282	0	2	1 8:17:47
6L2	-120.9939	37.62466	0	282	0	2	1 8:18:48
6L2	-120.9939	37.62466	0	282	0	2	1 8:19:48

# ANNEX C

Latitude	Longitude	Icon	LineStyleColor	Description	Name	LabelColor	Speed-KPH	Speed-MPH	Speed-FPS	TimeWhen	Decimal Day	Time text	Easting	Northing	displacement	seconds	meters/sec	Calculated
37.58645	-120.58903	98		0 0 mph @ 7:51:51 a.m.	7:51:51	none	0	0	0	7:51:51	0.327673611	7:51:51	1956810.286	620687.7202				
37.58644	-120.58897	98		0 2.5 mph @ 7:52:05 a.m.	7:52:05	none	4	2.5	3.6	7:52:05	0.327835648	7:52:05	1956815.579	620686.6327	5.41	14	0.4	1.3
37.58641	-120.58891	98		0 5 mph @ 7:52:17 a.m.	7:52:17	none	8	5	7.3	7:52:17	0.327916667	7:52:17	1956820.861	620683.2757	6.26	7	0.9	2.9
37.58639	-120.58882	98		0 9.3 mph @ 7:52:14 a.m.	7:52:14	none	15	9.3	13.7	7:52:14	0.327939815	7:52:14	1956828.798	620681.0145	8.25	2	4.1	13.5
37.58638	-120.58872	98		0 8.7 mph @ 7:52:16 a.m.	7:52:16	none	14	8.7	12.8	7:52:16	0.327962963	7:52:16	1956817.624	620679.8586	8.9	2	4.5	14.6
37.58634	-120.58866	98		0 6.8 mph @ 7:52:18 a.m.	7:52:18	none	11	6.8	10	7:52:18	0.327986111	7:52:18	1956842.9	620675.3918	6.91	2	3.5	11.3
37.58634	-120.58866	98		0 0 mph @ 7:52:25 a.m.	7:52:25	none	0	0	0	7:52:25	0.32806713	7:52:25	1956841.133	620675.401	1.77	7	0.3	0.0
37.58633	-120.58874	98		0 3.7 mph @ 7:52:28 a.m.	7:52:28	none	6	3.7	5.5	7:52:28	0.328101852	7:52:28	1956815.828	620674.3189	5.41	3	1.8	5.9
37.58632	-120.58868	98		0 0 mph @ 7:52:33 a.m.	7:52:33	none	0	0	0	7:52:33	0.328159722	7:52:33	1956830.524	620673.2367	5.41	5	1.1	3.6
37.58632	-120.58888	98		0 0 mph @ 7:53:32 a.m.	7:53:32	none	0	0	0	7:53:32	0.328842593	7:53:32	1956810.524	620673.2367	0	59	0	0
37.58632	-120.58888	98		0 0 mph @ 7:54:32 a.m.	7:54:32	none	0	0	0	7:54:32	0.329537037	7:54:32	1956810.524	620673.2367	0	60	0	0
37.58632	-120.58888	98		0 0 mph @ 7:55:32 a.m.	7:55:32	none	0	0	0	7:55:32	0.330231481	7:55:32	1956810.524	620673.2367	0	60	0	0
37.58632	-120.58888	98		0 0 mph @ 7:56:32 a.m.	7:56:32	none	0	0	0	7:56:32	0.330925926	7:56:32	1956810.524	620673.2367	0	60	0	0
37.58632	-120.58888	98		0 0 mph @ 7:57:32 a.m.	7:57:32	none	0	0	0	7:57:32	0.33162037	7:57:32	1956810.524	620673.2367	0	60	0	0
37.58632	-120.58888	98		0 0 mph @ 7:58:32 a.m.	7:58:32	none	0	0	0	7:58:32	0.332314815	7:58:32	1956810.524	620673.2367	0	60	0	0
37.58632	-120.58888	98		0 0 mph @ 7:59:32 a.m.	7:59:32	none	0	0	0	7:59:32	0.333009259	7:59:32	1956810.524	620673.2367	0	60	0	0
37.58632	-120.58888	98		0 0 mph @ 8:00:32 a.m.	8:00:32	none	0	0	0	8:00:32	0.333703704	8:00:32	1956810.524	620673.2367	0	60	0	0
37.58632	-120.58888	98		0 0 mph @ 8:01:32 a.m.	8:01:32	none	0	0	0	8:01:32	0.334398148	8:01:32	1956810.524	620673.2367	0	60	0	0
37.58636	-120.58895	98		0 0 mph @ 8:01:52 a.m.	8:01:52	none	0	0	0	8:01:52	0.33462963	8:01:52	1956817.299	620677.7451	13.97	20	0.7	2.3
37.58642	-120.58898	98		0 5 mph @ 8:01:54 a.m.	8:01:54	none	8	5	7.3	8:01:54	0.334652798	8:01:54	1956814.685	620684.4178	7.17	2	3.6	11.8
37.58652	-120.58897	98		0 12.4 mph @ 8:01:56 a.m.	8:01:56	none	20	12.4	18.2	8:01:56	0.334675926	8:01:56	1956815.626	620695.5111	11.13	2	5.6	18.3
37.58659	-120.58894	98		0 8.1 mph @ 8:01:58 a.m.	8:01:58	none	13	8.1	11.8	8:01:58	0.334699074	8:01:58	1956818.316	620703.2659	8.21	2	4.1	13.5
37.58664	-120.58892	98		0 1.2 mph @ 8:02:01 a.m.	8:02:01	none	2	1.2	1.8	8:02:01	0.334733796	8:02:01	1956820.111	620708.8056	5.82	3	1.9	6.4
37.58663	-120.58893	98		0 0 mph @ 8:03:01 a.m.	8:03:01	none	0	0	0	8:03:01	0.335428241	8:03:01	1956819.222	620707.7094	1.42	80	0	0.1
37.58663	-120.58893	98		0 0 mph @ 8:04:01 a.m.	8:04:01	none	0	0	0	8:04:01	0.336122685	8:04:01	1956819.222	620707.7094	0	60	0	0
37.58667	-120.58893	98		0 3.7 mph @ 8:04:56 a.m.	8:04:56	none	6	3.7	5.5	8:04:56	0.336759259	8:04:56	1956819.245	620712.1396	4.44	55	0.1	0.3
37.58676	-120.58893	98		0 11.2 mph @ 8:04:58 a.m.	8:04:58	none	18	11.2	16.4	8:04:58	0.336782407	8:04:58	1956819.298	620722.1278	9.99	2	5	16.4
37.58686	-120.58891	98		0 11.2 mph @ 8:05:09 a.m.	8:05:09	none	18	11.2	16.4	8:05:09	0.336805556	8:05:09	1956821.122	620733.2166	11.24	2	5.6	18.4
37.58691	-120.58885	98		0 6.8 mph @ 8:05:02 a.m.	8:05:02	none	11	6.8	10	8:05:02	0.336828704	8:05:02	1956826.45	620738.7379	7.67	2	3.8	12.6
37.58691	-120.58881	98		0 0 mph @ 8:06:02 a.m.	8:06:02	none	0	0	0	8:06:02	0.337523148	8:06:02	1956829.982	620738.7194	3.53	60	0.1	0.2
37.58691	-120.58881	98		0 0 mph @ 8:07:01 a.m.	8:07:01	none	0	0	0	8:07:01	0.338206019	8:07:01	1956829.982	620738.7194	0	59	0	0
37.58691	-120.58881	98		0 0 mph @ 8:08:01 a.m.	8:08:01	none	0	0	0	8:08:01	0.338900463	8:08:01	1956829.982	620738.7194	0	60	0	0
37.58691	-120.58881	98		0 0 mph @ 8:09:01 a.m.	8:09:01	none	0	0	0	8:09:01	0.339594907	8:09:01	1956829.982	620738.7194	0	60	0	0
37.58691	-120.58881	98		0 0 mph @ 8:10:00 a.m.	8:10:00	none	0	0	0	8:10:00	0.340277778	8:10:00	1956829.982	620738.7194	0	59	0	0
37.58687	-120.58879	98		0 2.5 mph @ 8:10:43 a.m.	8:10:43	none	4	2.5	3.6	8:10:43	0.340775463	8:10:43	1956831.726	620734.271	4.78	43	0.1	0.4
37.58687	-120.58871	98		0 5 mph @ 8:10:47 a.m.	8:10:47	none	8	5	7.3	8:10:47	0.340821759	8:10:47	1956838.791	620734.2341	7.07	4	1.8	5.8
37.58686	-120.58863	98		0 5 mph @ 8:10:50 a.m.	8:10:50	none	8	5	7.3	8:10:50	0.340855481	8:10:50	1956645.85	620733.0874	7.15	3	2.4	7.8
37.58686	-120.58856	98		0 6.8 mph @ 8:10:52 a.m.	8:10:52	none	11	6.8	10	8:10:52	0.34087963	8:10:52	1956852.032	620733.0551	6.18	2	3.1	10.1
37.58686	-120.58846	98		0 6.2 mph @ 8:10:55 a.m.	8:10:55	none	10	6.2	9.1	8:10:55	0.340914552	8:10:55	1956860.864	620733.009	8.83	3	2.9	9.7
37.58689	-120.58884	98		0 6.2 mph @ 8:10:57 a.m.	8:10:57	none	10	6.2	9.1	8:10:57	0.3409375	8:10:57	1956866.18	620736.3108	6.26	2	3.1	10.3
37.58694	-120.58836	98		0 7.5 mph @ 8:10:59 a.m.	8:10:59	none	12	7.5	10.9	8:10:59	0.340960648	8:10:59	1956869.742	620741.8413	6.58	2	3.3	10.8
37.58703	-120.58835	98		0 9.9 mph @ 8:11:01 a.m.	8:11:01	none	16	9.9	14.6	8:11:01	0.340983796	8:11:01	1956870.677	620751.8249	10.03	2	5	16.4
37.58712	-120.58835	98		0 10.6 mph @ 8:11:03 a.m.	8:11:03	none	17	10.6	15.5	8:11:03	0.341006944	8:11:03	1956870.729	620761.8111	9.99	2	5	16.4
37.5872	-120.58834	98		0 9.9 mph @ 8:11:05 a.m.	8:11:05	none	16	9.9	14.6	8:11:05	0.341030093	8:11:05	1956871.659	620770.6868	8.92	2	4.5	14.6
37.58733	-120.58838	98		0 7.5 mph @ 8:11:07 a.m.	8:11:07	none	12	7.5	10.9	8:11:07	0.341053241	8:11:07	1956871.694	620777.3456	6.66	2	3.3	10.9
37.58733	-120.58838	98		0 8.1 mph @ 8:11:09 a.m.	8:11:09	none	13	8.1	11.8	8:11:09	0.341076389	8:11:09	1956868.201	620785.1316	8.53	2	4.3	14
37.58736	-120.58847	98		0 9.9 mph @ 8:11:11 a.m.	8:11:11	none	16	9.9	14.6	8:11:11	0.341099537	8:11:11	1956860.27	620788.5035	8.62	2	4.3	14.1
37.58736	-120.58857	98		0 8.7 mph @ 8:11:13 a.m.	8:11:13	none	14	8.7	12.8	8:11:13	0.341122685	8:11:13	1956851.439	620788.5496	8.83	2	4.4	14.5
37.58736	-120.58865	98		0 6.8 mph @ 8:11:15 a.m.	8:11:15	none	11	6.8	10	8:11:15	0.341145833	8:11:15	1956844.374	620788.5865	7.07	2	3.5	11.6

37.58736	-120.98871	98	0 25 mph @ 8:11:18 a.m.	8:11:18	none	4	2.5	3.6	8:11:18	0.341180556	8:11:18	1956839.075	620788.6142	5.3	3	1.8	5.8
37.58738	-120.98877	98	0 5 mph @ 8:11:22 a.m.	8:11:22	none	8	5	7.3	8:11:22	0.341226852	8:11:22	1956833.788	620790.8614	5.75	4	1.4	4.7
37.58742	-120.98888	98	0 311 mph @ 8:11:25 a.m.	8:11:25	none	5	3.1	4.6	8:11:25	0.341261574	8:11:25	1956831.161	620795.3145	5.17	3	1.7	5.7
37.58746	-120.98879	98	0 19 mph @ 8:11:45 a.m.	8:11:45	none	3	1.9	2.7	8:11:45	0.341463056	8:11:45	1956932.068	620799.740	4.53	20	0.2	0.7
37.58751	-120.98888	98	0 62 mph @ 8:11:47 a.m.	8:11:47	none	10	5.2	9.1	8:11:47	0.341516204	8:11:47	1956831.213	620805.2026	5.62	2	2.8	9.2
37.58758	-120.98882	98	0 6.8 mph @ 8:11:50 a.m.	8:11:50	none	11	6.8	10	8:11:50	0.341559226	8:11:50	1956829.488	620811.0805	7.97	3	2.7	8.7
37.58763	-120.98890	98	0 11.8 mph @ 8:11:51 a.m.	8:11:52	none	19	11.8	17.3	8:11:52	0.341574074	8:11:52	1956822.451	620818.6664	8.98	2	4.5	14.7
37.58766	-120.98907	98	0 19.9 mph @ 8:11:54 a.m.	8:11:54	none	32	19.9	29.2	8:11:54	0.341597222	8:11:54	1956807.455	620822.0742	15.38	2	7.7	25.7
37.58767	-120.98953	98	0 30.4 mph @ 8:11:57 a.m.	8:11:57	none	49	30.4	44.7	8:11:57	0.341631944	8:11:57	1956746.836	620823.3964	40.64	3	13.5	44.4
37.58767	-120.98993	98	0 37.9 mph @ 8:11:59 a.m.	8:11:59	none	61	37.9	55.6	8:11:59	0.341655093	8:11:59	1956731.51	620823.5813	35.33	2	17.7	58
37.58767	-120.99037	98	0 42.3 mph @ 8:12:01 a.m.	8:12:01	none	68	42.3	62	8:12:01	0.341678241	8:12:01	1956692.652	620823.7848	38.86	2	19.4	63.7
37.58767	-120.99081	98	0 42.3 mph @ 8:12:03 a.m.	8:12:03	none	68	42.3	62	8:12:03	0.341701389	8:12:03	1956653.793	620823.9885	38.86	2	19.4	63.7
37.58767	-120.99125	98	0 41 mph @ 8:12:05 a.m.	8:12:05	none	66	41	60.1	8:12:05	0.341724537	8:12:05	1956614.935	620824.1924	38.86	2	19.4	63.7
37.58767	-120.99168	98	0 41 mph @ 8:12:07 a.m.	8:12:07	none	66	41	60.1	8:12:07	0.341747685	8:12:07	1956576.959	620824.3918	37.98	2	19	62.3
37.58768	-120.99221	98	0 40.4 mph @ 8:12:09 a.m.	8:12:09	none	65	40.4	59.2	8:12:09	0.341770833	8:12:09	1956539.867	620824.5868	37.09	2	18.5	60.8
37.58768	-120.99251	98	0 39.1 mph @ 8:12:11 a.m.	8:12:11	none	63	39.1	57.4	8:12:11	0.341793981	8:12:11	1956503.664	620825.857	36.23	2	18.1	59.4
37.58768	-120.99271	98	0 39.1 mph @ 8:12:12 a.m.	8:12:12	none	63	39.1	57.4	8:12:12	0.341807556	8:12:12	1956486.001	620825.98	17.66	1	17.7	58
37.58768	-120.99305	98	0 29.8 mph @ 8:12:14 a.m.	8:12:14	none	48	29.8	43.7	8:12:14	0.341828704	8:12:14	1956455.974	620826.1382	30.03	2	15	49.3
37.58768	-120.99331	98	0 22.4 mph @ 8:12:16 a.m.	8:12:16	none	36	22.4	32.8	8:12:16	0.341851852	8:12:16	1956433.012	620826.2592	22.96	2	11.5	37.7
37.58768	-120.99348	98	0 18 mph @ 8:12:18 a.m.	8:12:18	none	29	18	26.4	8:12:18	0.341875	8:12:18	1956417.999	620826.3383	15.01	2	7.5	24.6
37.58771	-120.99353	98	0 5 mph @ 8:12:20 a.m.	8:12:20	none	8	5	7.3	8:12:20	0.341898148	8:12:20	1956413.6	620829.691	5.53	2	2.8	9.1
37.58776	-120.99357	98	0 9.9 mph @ 8:12:22 a.m.	8:12:22	none	16	9.9	14.6	8:12:22	0.341921296	8:12:22	1956410.097	620835.2586	6.58	2	3.3	10.8
37.58782	-120.99359	98	0 16.2 mph @ 8:12:24 a.m.	8:12:24	none	26	16.2	23.7	8:12:24	0.341944444	8:12:24	1956408.395	620837.4757	12.34	2	6.2	20.2
37.58807	-120.99357	98	0 26.1 mph @ 8:12:26 a.m.	8:12:26	none	42	26.1	38.3	8:12:26	0.341967593	8:12:26	1956410.278	620859.6623	22.27	2	11.1	36.5
37.58864	-120.99357	98	0 36.7 mph @ 8:12:29 a.m.	8:12:29	none	59	36.7	53.8	8:12:29	0.342007315	8:12:29	1956410.554	620917.8278	52.16	3	17.4	57
37.58899	-120.99356	98	0 47.2 mph @ 8:12:31 a.m.	8:12:31	none	76	47.2	69.3	8:12:31	0.342025463	8:12:31	1956411.7	620971.759	49.95	2	25	81.9
37.58947	-120.99356	98	0 53.4 mph @ 8:12:33 a.m.	8:12:33	none	86	53.4	78.4	8:12:33	0.342048611	8:12:33	1956411.981	621025.0293	53.27	2	26.6	87.4
37.58994	-120.99356	98	0 55.3 mph @ 8:12:35 a.m.	8:12:35	none	89	55.3	81.1	8:12:35	0.342071759	8:12:35	1956412.256	621077.1888	52.16	2	26.1	85.6
37.5904	-120.99356	98	0 55.3 mph @ 8:12:37 a.m.	8:12:37	none	89	55.3	81.1	8:12:37	0.342094907	8:12:37	1956412.525	621128.2405	51.05	2	25.5	83.7
37.59085	-120.99355	98	0 54.7 mph @ 8:12:39 a.m.	8:12:39	none	88	54.7	80.2	8:12:39	0.342118056	8:12:39	1956413.672	621178.1767	49.95	2	25	81.9
37.59129	-120.99355	98	0 51.4 mph @ 8:12:41 a.m.	8:12:41	none	86	51.4	78.4	8:12:41	0.342141204	8:12:41	1956413.929	621227.0078	48.83	2	24.4	80.1
37.59171	-120.99354	98	0 51.6 mph @ 8:12:43 a.m.	8:12:43	none	83	51.6	75.6	8:12:43	0.342164352	8:12:43	1956415.058	621273.6147	46.62	2	23.3	76.5
37.59192	-120.99354	98	0 50.3 mph @ 8:12:44 a.m.	8:12:44	none	81	50.3	73.8	8:12:44	0.342187500	8:12:44	1956415.181	621296.9205	23.31	1	23.3	76.5
37.5923	-120.99354	98	0 45.4 mph @ 8:12:46 a.m.	8:12:46	none	73	45.4	66.5	8:12:46	0.342199074	8:12:46	1956415.404	621319.0928	42.17	2	21.1	69.3
37.59265	-120.99354	98	0 42.9 mph @ 8:12:48 a.m.	8:12:48	none	69	42.9	62.9	8:12:48	0.342222222	8:12:48	1956415.608	621377.9357	38.84	2	19.4	63.7
37.59296	-120.99353	98	0 36 mph @ 8:12:50 a.m.	8:12:50	none	58	36	52.9	8:12:50	0.34224537	8:12:50	1956416.672	621412.3348	34.42	2	17.2	56.5
37.59323	-120.99353	98	0 32.9 mph @ 8:12:52 a.m.	8:12:52	none	53	32.9	48.3	8:12:52	0.342268519	8:12:52	1956416.831	621442.7993	29.96	2	15	49.2
37.59349	-120.99353	98	0 31.1 mph @ 8:12:54 a.m.	8:12:54	none	50	31.1	45.6	8:12:54	0.342291667	8:12:54	1956416.983	621471.1541	28.86	2	14.4	47.3
37.59362	-120.99353	98	0 31.1 mph @ 8:12:55 a.m.	8:12:55	none	50	31.1	45.6	8:12:55	0.342303241	8:12:55	1956417.059	621485.5815	14.43	1	14.4	47.3
37.59387	-120.99352	98	0 33.6 mph @ 8:12:57 a.m.	8:12:57	none	54	33.6	49.2	8:12:57	0.342326389	8:12:57	1956418.089	621513.3218	17.76	2	13.9	45.5
37.59425	-120.99354	98	0 32.9 mph @ 8:13:00 a.m.	8:13:00	none	53	32.9	48.3	8:13:00	0.342361111	8:13:00	1956418.545	621555.5034	42.21	3	14.1	46.2
37.59444	-120.99354	98	0 26.1 mph @ 8:13:02 a.m.	8:13:02	none	42	26.1	38.3	8:13:02	0.342384259	8:13:02	1956416.656	621576.5896	71.09	7	10.5	34.6
37.5946	-120.99355	98	0 19.9 mph @ 8:13:04 a.m.	8:13:04	none	32	19.9	29.2	8:13:04	0.342407407	8:13:04	1956415.867	621594.351	17.78	2	8.9	29.2
37.59471	-120.99356	98	0 15.5 mph @ 8:13:06 a.m.	8:13:06	none	25	15.5	22.8	8:13:06	0.342430556	8:13:06	1956415.048	621606.5634	12.24	2	6.1	20.1
37.59477	-120.99356	98	0 8.1 mph @ 8:13:08 a.m.	8:13:08	none	13	8.1	11.8	8:13:08	0.342453704	8:13:08	1956415.083	621613.2222	6.66	2	3.3	10.9
37.59482	-120.99353	98	0 5 mph @ 8:14:05 a.m.	8:14:05	none	8	5	7.3	8:14:05	0.343113426	8:14:05	1956417.762	621618.7573	6.15	57	0.1	0.4
37.59487	-120.99353	98	0 9.3 mph @ 8:14:06 a.m.	8:14:06	none	15	9.3	13.7	8:14:06	0.343125	8:14:06	1956417.791	621624.3062	5.55	1	5.5	18.2
37.59504	-120.99353	98	0 18.6 mph @ 8:14:08 a.m.	8:14:08	none	30	18.6	27.3	8:14:08	0.343148148	8:14:08	1956417.89	621643.1728	18.87	2	9.4	30.9
37.59515	-120.99353	98	0 23.6 mph @ 8:14:09 a.m.	8:14:09	none	38	23.6	34.6	8:14:09	0.343159722	8:14:09	1956417.956	621655.3806	12.21	1	12.2	40.1
37.5954	-120.99353	98	0 32.9 mph @ 8:14:11 a.m.	8:14:11	none	53	32.9	48.3	8:14:11	0.343182827	8:14:11	1956418.101	621683.1255	17.75	2	13.9	45.5

37.59571	-120.99353	98	0 39.1 mph @ 8:14:13 a.m.	8:14:13	none	63	39.1	57.4	8:14:13	0.343206019	8:14:13	1956418.283	621717.5193	34.4	2	17.2	56.4
37.59605	-120.99353	98	0 41 mph @ 8:14:15 a.m.	8:14:15	none	66	41	60.1	8:14:15	0.343279167	8:14:15	1956418.492	621755.2625	37.73	2	18.0	61.9
37.59641	-120.99353	98	0 43.5 mph @ 8:14:17 a.m.	8:14:17	none	70	43.5	63.8	8:14:17	0.343252315	8:14:17	1956418.692	621795.2152	39.95	2	20	65.5
37.59677	-120.99353	98	0 44.1 mph @ 8:14:19 a.m.	8:14:19	none	71	44.1	64.7	8:14:19	0.343275463	8:14:19	1956418.901	621835.1679	39.95	2	20	65.5
37.59713	-120.99354	98	0 44.7 mph @ 8:14:21 a.m.	8:14:21	none	72	44.7	65.6	8:14:21	0.343298611	8:14:21	1956418.231	621875.1254	39.96	2	20	65.6
37.5975	-120.99354	98	0 44.7 mph @ 8:14:23 a.m.	8:14:23	none	72	44.7	65.6	8:14:23	0.343321759	8:14:23	1956418.447	621916.1879	41.06	2	20.5	67.4
37.59787	-120.99353	98	0 45.4 mph @ 8:14:25 a.m.	8:14:25	none	73	45.4	66.5	8:14:25	0.343344907	8:14:25	1956419.547	621957.2458	41.07	2	20.5	67.4
37.59824	-120.99353	98	0 45.4 mph @ 8:14:27 a.m.	8:14:27	none	73	45.4	66.5	8:14:27	0.343368056	8:14:27	1956419.765	621998.3084	41.04	2	20.5	67.4
37.59879	-120.9935	98	0 45.4 mph @ 8:14:30 a.m.	8:14:30	none	73	45.4	66.5	8:14:30	0.343400778	8:14:30	1956422.734	622059.3333	61.1	3	20.4	66.8
37.59916	-120.99349	98	0 45.4 mph @ 8:14:32 a.m.	8:14:32	none	73	45.4	66.5	8:14:32	0.343425926	8:14:32	1956423.834	622100.3912	41.07	2	20.5	67.4
37.59953	-120.99349	98	0 45.4 mph @ 8:14:34 a.m.	8:14:34	none	73	45.4	66.5	8:14:34	0.343449074	8:14:34	1956424.05	622141.4538	41.06	2	20.5	67.4
37.5999	-120.99349	98	0 46 mph @ 8:14:36 a.m.	8:14:36	none	74	46	67.4	8:14:36	0.343472222	8:14:36	1956424.267	622182.5163	41.06	2	20.5	67.4
37.60009	-120.99349	98	0 46 mph @ 8:14:37 a.m.	8:14:37	none	74	46	67.4	8:14:37	0.343483796	8:14:37	1956424.378	622203.6025	21.09	1	21.1	69.2
37.60046	-120.99349	98	0 46 mph @ 8:14:39 a.m.	8:14:39	none	74	46	67.4	8:14:39	0.343506944	8:14:39	1956424.595	622244.6651	41.06	2	20.5	67.4
37.60083	-120.99349	98	0 46 mph @ 8:14:41 a.m.	8:14:41	none	74	46	67.4	8:14:41	0.343530093	8:14:41	1956424.811	622285.7277	41.06	2	20.5	67.4
37.6012	-120.9935	98	0 46 mph @ 8:14:43 a.m.	8:14:43	none	74	46	67.4	8:14:43	0.343553241	8:14:43	1956424.145	622326.7949	41.07	2	20.5	67.4
37.60158	-120.9935	98	0 46 mph @ 8:14:45 a.m.	8:14:45	none	74	46	67.4	8:14:45	0.343576389	8:14:45	1956424.367	622368.9672	42.17	2	21.1	69.2
37.60195	-120.9935	98	0 46 mph @ 8:14:47 a.m.	8:14:47	none	74	46	67.4	8:14:47	0.343599537	8:14:47	1956424.584	622410.0298	41.06	2	20.5	67.4
37.60232	-120.9935	98	0 46 mph @ 8:14:49 a.m.	8:14:49	none	74	46	67.4	8:14:49	0.343622685	8:14:49	1956424.8	622451.0924	41.06	2	20.5	67.4
37.60269	-120.9935	98	0 44.7 mph @ 8:14:51 a.m.	8:14:51	none	72	44.7	65.6	8:14:51	0.343645833	8:14:51	1956425.017	622492.155	41.06	2	20.5	67.4
37.60307	-120.9935	98	0 45.6 mph @ 8:14:53 a.m.	8:14:53	none	75	45.6	68.4	8:14:53	0.343668981	8:14:53	1956425.235	622534.3274	42.17	2	21.1	69.2
37.60344	-120.9935	98	0 45.4 mph @ 8:14:55 a.m.	8:14:55	none	73	45.4	66.5	8:14:55	0.34369213	8:14:55	1956425.456	622575.3899	41.06	2	20.5	67.4
37.60381	-120.9935	98	0 45 mph @ 8:14:57 a.m.	8:14:57	none	74	46	67.4	8:14:57	0.343715278	8:14:57	1956425.672	622616.4525	41.06	2	20.5	67.4
37.60419	-120.9935	98	0 47.2 mph @ 8:14:59 a.m.	8:14:59	none	76	47.2	69.3	8:14:59	0.343738426	8:14:59	1956425.894	622658.6249	42.17	2	21.1	69.2
37.60475	-120.99349	98	0 45.6 mph @ 8:15:02 a.m.	8:15:02	none	75	45.6	68.4	8:15:02	0.343761574	8:15:02	1956427.105	622700.769	62.16	3	20.7	68
37.60512	-120.99349	98	0 45.4 mph @ 8:15:04 a.m.	8:15:04	none	73	45.4	66.5	8:15:04	0.343784722	8:15:04	1956427.322	622741.8316	41.06	2	20.5	67.4
37.60547	-120.9935	98	0 45.5 mph @ 8:15:06 a.m.	8:15:06	none	70	45.5	63.8	8:15:06	0.343819444	8:15:06	1956426.644	622800.6793	38.85	2	19.4	63.7
37.60582	-120.99351	98	0 41 mph @ 8:15:08 a.m.	8:15:08	none	70	43.5	63.8	8:15:08	0.343842593	8:15:08	1956425.965	622839.5269	38.85	2	19.4	63.7
37.60633	-120.99352	98	0 42.3 mph @ 8:15:11 a.m.	8:15:11	none	68	42.3	62	8:15:11	0.343877315	8:15:11	1956425.381	622896.1314	56.61	3	18.9	61.9
37.60667	-120.99353	98	0 41 mph @ 8:15:13 a.m.	8:15:13	none	66	41	60.1	8:15:13	0.343900463	8:15:13	1956424.697	622933.8692	37.74	2	18.9	61.9
37.60699	-120.99353	98	0 40.4 mph @ 8:15:15 a.m.	8:15:15	none	65	40.4	59.2	8:15:15	0.343923611	8:15:15	1956424.884	622969.3828	35.51	2	17.8	58.3
37.60715	-120.99353	98	0 37.9 mph @ 8:15:16 a.m.	8:15:16	none	61	37.9	55.6	8:15:16	0.34395185	8:15:16	1956424.978	622987.1396	17.76	1	17.8	58.3
37.60743	-120.99353	98	0 34.8 mph @ 8:15:18 a.m.	8:15:18	none	56	34.8	51	8:15:18	0.34398333	8:15:18	1956425.142	623018.214	31.07	2	15.5	51
37.60768	-120.99353	98	0 29.8 mph @ 8:15:20 a.m.	8:15:20	none	48	29.8	43.7	8:15:20	0.343981481	8:15:20	1956425.288	623045.959	27.75	2	13.9	45.5
37.6079	-120.99354	98	0 25.5 mph @ 8:15:22 a.m.	8:15:22	none	41	25.5	37.4	8:15:22	0.34400463	8:15:22	1956424.534	623070.3793	24.43	2	12.2	40.1
37.6081	-120.99354	98	0 24.9 mph @ 8:15:24 a.m.	8:15:24	none	40	24.9	36.5	8:15:24	0.344027778	8:15:24	1956424.651	623092.5753	22.2	2	11.1	36.4
37.60829	-120.99354	98	0 24.2 mph @ 8:15:26 a.m.	8:15:26	none	39	24.2	35.5	8:15:26	0.344050926	8:15:26	1956424.762	623113.6615	21.09	2	10.5	34.6
37.6085	-120.99354	98	0 28.6 mph @ 8:15:28 a.m.	8:15:28	none	46	28.6	41.9	8:15:28	0.344074074	8:15:28	1956424.885	623136.913	23.31	2	11.7	38.2
37.60884	-120.99353	98	0 28 mph @ 8:15:31 a.m.	8:15:31	none	45	28	41	8:15:31	0.344108796	8:15:31	1956425.967	623174.6958	37.74	3	12.6	41.3
37.60903	-120.99353	98	0 23.6 mph @ 8:15:33 a.m.	8:15:33	none	38	23.6	34.6	8:15:33	0.344131944	8:15:33	1956426.078	623195.782	21.09	2	10.5	34.6
37.60917	-120.99353	98	0 17.4 mph @ 8:15:35 a.m.	8:15:35	none	28	17.4	25.5	8:15:35	0.344155093	8:15:35	1956426.16	623211.3192	15.54	2	7.8	25.5
37.60924	-120.99352	98	0 9.3 mph @ 8:15:37 a.m.	8:15:37	none	15	9.3	13.7	8:15:37	0.344178241	8:15:37	1956427.084	623219.0832	7.82	2	3.9	12.8
37.60929	-120.99351	98	0 9.9 mph @ 8:15:49 a.m.	8:15:49	none	16	9.9	14.6	8:15:49	0.34431713	8:15:49	1956427.996	623224.6275	5.62	12	0.5	1.5
37.60941	-120.99351	98	0 14.3 mph @ 8:15:51 a.m.	8:15:51	none	23	14.3	21	8:15:51	0.344340278	8:15:51	1956428.066	623237.9451	13.32	2	6.7	21.8
37.60959	-120.9935	98	0 24.2 mph @ 8:15:53 a.m.	8:15:53	none	39	24.2	35.5	8:15:53	0.344363426	8:15:53	1956429.055	623257.9169	20	2	10	32.8
37.60981	-120.9935	98	0 28 mph @ 8:15:55 a.m.	8:15:55	none	45	28	41	8:15:55	0.344386574	8:15:55	1956429.183	623282.3325	24.42	2	12.2	40.1
37.61006	-120.9935	98	0 30.4 mph @ 8:15:57 a.m.	8:15:57	none	49	30.4	44.7	8:15:57	0.344409722	8:15:57	1956429.33	623310.0725	17.75	2	13.9	45.5
37.61048	-120.99352	98	0 34.8 mph @ 8:16:00 a.m.	8:16:00	none	56	34.8	51	8:16:00	0.344444444	8:16:00	1956427.81	623356.6984	46.65	3	15.5	51
37.61078	-120.99353	98	0 37.3 mph @ 8:16:02 a.m.	8:16:02	none	60	37.3	54.7	8:16:02	0.344467593	8:16:02	1956427.103	623389.9971	13.31	2	16.7	54.6
37.6111	-120.99356	98	0 39.1 mph @ 8:16:04 a.m.	8:16:04	none	63	39.1	57.4	8:16:04	0.344490741	8:16:04	1956421.641	623425.5247	35.61	2	17.8	58.4

37.61143	-120.99357	98	0 39.8 mph @ 8:16:06 a.m.	8:16:06	none	64	39.8	58.3	8:16:06	0.344513889	8:16:06	1956423.951	623462.1528	36.63	2	18.3	60.1
37.61177	-120.99358	98	0 41 mph @ 8:16:08 a.m.	8:16:08	none	66	41	60.1	8:16:08	0.344537037	8:16:08	1956423.268	623499.8906	37.24	2	18.9	61.9
37.61212	-120.99359	98	0 42.3 mph @ 8:16:10 a.m.	8:16:10	none	68	42.3	62	8:16:10	0.344560185	8:16:10	1956422.59	623538.7383	38.85	2	19.4	63.7
37.61244	-120.99359	98	0 40.4 mph @ 8:16:12 a.m.	8:16:12	none	65	40.4	59.2	8:16:12	0.344583333	8:16:12	1956422.777	623574.2510	35.51	2	17.8	58.3
37.61259	-120.99359	98	0 36.7 mph @ 8:16:13 a.m.	8:16:13	none	59	36.7	53.8	8:16:13	0.344594907	8:16:13	1956422.865	623590.899	16.65	1	16.6	54.6
37.61289	-120.99359	98	0 36 mph @ 8:16:15 a.m.	8:16:15	none	58	36	52.9	8:16:15	0.344618056	8:16:15	1956423.04	623624.192	33.29	2	16.6	54.6
37.61318	-120.99359	98	0 34.8 mph @ 8:16:17 a.m.	8:16:17	none	56	34.8	51	8:16:17	0.344641204	8:16:17	1956423.21	623656.3772	32.18	2	16.1	52.8
37.61346	-120.99359	98	0 32.9 mph @ 8:16:19 a.m.	8:16:19	none	53	32.9	48.3	8:16:19	0.344664352	8:16:19	1956423.374	623687.4511	31.07	2	15.5	51
37.61372	-120.9936	98	0 31.7 mph @ 8:16:21 a.m.	8:16:21	none	51	31.7	46.5	8:16:21	0.3446875	8:16:21	1956422.643	623716.3116	28.87	2	14.4	47.4
37.61399	-120.9936	98	0 35.4 mph @ 8:16:23 a.m.	8:16:23	none	57	35.4	51.9	8:16:23	0.344710648	8:16:23	1956422.801	623746.2757	29.97	2	15	49.2
37.61429	-120.99359	98	0 36.7 mph @ 8:16:25 a.m.	8:16:25	none	59	36.7	53.8	8:16:25	0.344733796	8:16:25	1956423.86	623779.5651	33.31	2	16.7	54.6
37.61459	-120.99359	98	0 36.7 mph @ 8:16:27 a.m.	8:16:27	none	59	36.7	53.8	8:16:27	0.344756944	8:16:27	1956424.035	623812.8591	33.29	2	16.6	54.6
37.61507	-120.99358	98	0 39.8 mph @ 8:16:30 a.m.	8:16:30	none	64	39.8	58.3	8:16:30	0.344791667	8:16:30	1956425.159	623866.1249	53.28	3	17.8	58.3
37.6154	-120.99358	98	0 40.4 mph @ 8:16:32 a.m.	8:16:32	none	65	40.4	59.2	8:16:32	0.344814815	8:16:32	1956425.392	623902.7484	36.62	2	18.3	60.1
37.61571	-120.99356	98	0 38.5 mph @ 8:16:34 a.m.	8:16:34	none	62	38.5	56.5	8:16:34	0.344837963	8:16:34	1956427.339	623937.1429	34.45	2	17.2	56.5
37.61595	-120.99354	98	0 30.4 mph @ 8:16:36 a.m.	8:16:36	none	49	30.4	44.7	8:16:36	0.344861111	8:16:36	1956429.246	623963.7688	26.69	2	13.3	43.8
37.61612	-120.99351	98	0 22.4 mph @ 8:16:38 a.m.	8:16:38	none	34	22.4	32.8	8:16:38	0.344884259	8:16:38	1956431.993	623982.6215	19.05	2	9.5	31.3
37.61623	-120.9935	98	0 14.9 mph @ 8:16:40 a.m.	8:16:40	none	24	14.9	21.9	8:16:40	0.344907407	8:16:40	1956432.941	623994.8246	12.24	2	6.1	20.1
37.61628	-120.9935	98	0 5.7 mph @ 8:16:42 a.m.	8:16:42	none	10	6.7	9.1	8:16:42	0.344930556	8:16:42	1956432.97	624000.3736	5.55	2	2.8	9.1
37.61638	-120.99351	98	0 12.4 mph @ 8:17:00 a.m.	8:17:00	none	20	12.4	18.2	8:17:00	0.345138889	8:17:00	1956432.146	624011.4763	11.13	18	0.6	2
37.61656	-120.99351	98	0 21.7 mph @ 8:17:02 a.m.	8:17:02	none	35	21.7	31.9	8:17:02	0.345162037	8:17:02	1956432.251	624031.4527	10.98	2	10	32.8
37.61679	-120.99352	98	0 28 mph @ 8:17:04 a.m.	8:17:04	none	45	28	41	8:17:04	0.345185185	8:17:04	1956431.503	624056.9828	25.54	2	12.8	41.9
37.61705	-120.99354	98	0 32.3 mph @ 8:17:06 a.m.	8:17:06	none	52	32.3	47.4	8:17:06	0.345208333	8:17:06	1956429.889	624085.847	28.91	2	14.5	47.4
37.61733	-120.99356	98	0 14.8 mph @ 8:17:08 a.m.	8:17:08	none	56	34.8	51	8:17:08	0.345231481	8:17:08	1956428.288	624116.9907	31.12	2	15.6	51.1
37.61763	-120.99358	98	0 36 mph @ 8:17:10 a.m.	8:17:10	none	56	36	52.9	8:17:10	0.34525463	8:17:10	1956426.695	624150.2341	33.34	2	16.7	54.7
37.61794	-120.99359	98	0 37.3 mph @ 8:17:12 a.m.	8:17:12	none	60	37.3	54.7	8:17:12	0.345277778	8:17:12	1956425.995	624184.6426	34.42	2	17.2	56.5
37.6181	-120.9936	98	0 39.1 mph @ 8:17:13 a.m.	8:17:13	none	63	39.1	57.4	8:17:13	0.345299552	8:17:13	1956425.207	624202.4041	17.78	1	17.8	58.3
37.61862	-120.99364	98	0 46 mph @ 8:17:16 a.m.	8:17:16	none	74	46	67.4	8:17:16	0.345324074	8:17:16	1956421.98	624260.1324	57.82	3	19.3	63.2
37.61904	-120.99363	98	0 49.7 mph @ 8:17:19 a.m.	8:17:19	none	80	49.7	72.9	8:17:18	0.345347222	8:17:18	1956423.109	624306.7394	46.62	2	23.3	76.5
37.61929	-120.99364	98	0 57.8 mph @ 8:17:19 a.m.	8:17:19	none	93	57.8	84.8	8:17:19	0.345358796	8:17:19	1956422.373	624334.4891	27.76	1	27.8	91.1
37.61982	-120.99361	98	0 62.1 mph @ 8:17:21 a.m.	8:17:21	none	100	62.1	91.1	8:17:21	0.345381944	8:17:21	1956425.331	624393.2946	58.88	2	29.4	96.6
37.62038	-120.99359	98	0 65.9 mph @ 8:17:23 a.m.	8:17:23	none	106	65.9	96.6	8:17:23	0.345405093	8:17:23	1956427.425	624455.4342	62.17	2	31.1	102
37.62094	-120.99356	98	0 65.9 mph @ 8:17:25 a.m.	8:17:25	none	106	65.9	96.6	8:17:25	0.345428241	8:17:25	1956430.401	624517.5691	62.21	2	31.1	102
37.62151	-120.99355	98	0 71.5 mph @ 8:17:27 a.m.	8:17:27	none	115	71.5	104.8	8:17:27	0.345451389	8:17:27	1956431.617	624580.8332	63.27	2	31.6	103.8
37.62215	-120.99357	98	0 76.4 mph @ 8:17:29 a.m.	8:17:29	none	123	76.4	112.1	8:17:29	0.345474537	8:17:29	1956430.225	624651.8998	71.05	2	35.5	116.6
37.62315	-120.9936	98	0 82 mph @ 8:17:32 a.m.	8:17:32	none	132	82	120.3	8:17:32	0.345509259	8:17:32	1956428.163	624762.454	111.01	3	37	121.4
37.62389	-120.99365	98	0 87 mph @ 8:17:34 a.m.	8:17:34	none	140	87	127.6	8:17:34	0.345532407	8:17:34	1956424.181	624845.0027	82.25	2	41.1	134.9
37.62444	-120.99365	98	0 89.9 mph @ 8:17:36 a.m.	8:17:36	none	143	89.9	130.1	8:17:36	0.345555556	8:17:36	1956424.505	624906.0418	61.04	2	30.5	100.1
37.62505	-120.99358	98	0 85.7 mph @ 8:17:38 a.m.	8:17:38	none	138	85.7	125.8	8:17:38	0.345578704	8:17:38	1956431.041	624973.7072	67.98	2	34	111.5
37.62557	-120.99343	98	0 81.4 mph @ 8:17:40 a.m.	8:17:40	none	131	81.4	119.4	8:17:40	0.345601852	8:17:40	1956444.586	625031.3471	59.21	2	29.6	97.1
37.62531	-120.99375	98	0 36.7 mph @ 8:17:42 a.m.	8:17:42	none	59	36.7	53.8	8:17:42	0.345625	8:17:42	1956416.187	625002.6412	40.38	2	20.2	66.2
37.62494	-120.99389	98	0 3.7 mph @ 8:17:44 a.m.	8:17:44	none	6	3.7	5.5	8:17:44	0.345648148	8:17:44	1956403.613	624961.6437	42.88	2	21.4	70.3
37.62472	-120.99392	98	0 0.6 mph @ 8:17:46 a.m.	8:17:46	none	1	0.6	0.9	8:17:46	0.345671296	8:17:46	1956400.836	624937.242	24.56	2	12.3	40.3
37.62466	-120.9939	98	0 0 mph @ 8:17:47 a.m.	8:17:47	none	0	0	0	8:17:47	0.34568287	8:17:47	1956402.566	624930.5739	6.89	1	6.9	22.6
37.62466	-120.9939	98	0 0 mph @ 8:18:48 a.m.	8:18:48	none	0	0	0	8:18:48	0.346388889	8:18:48	1956402.566	624930.5739	0	61	0	0
37.62466	-120.9939	98	0 0 mph @ 8:19:48 a.m.	8:19:48	none	0	0	0	8:19:48	0.347083333	8:19:48	1956402.566	624930.5739	0	60	0	0



CHRA SB

OGC Lit  
Product Claims

MAY 16 2017

LAW OFFICES OF  
**DAVID J. FARRELL**  
25909 PALA, SUITE 310  
MISSION VIEJO, CALIFORNIA 92691-2778  
TELEPHONE 949-305-7766  
FACSIMILE 949-305-7775  
www.davidjfarrell.com

DAVID J. FARRELL  
djf@davidjfarrell.com

May 10, 2017

Via Certified Mail  
Return-Receipt Requested

Ford Motor Company  
World Headquarters  
1 American Road, Suite 400  
Consumer Litigation  
Dearborn, Michigan 48126

OGC Lit  
Consumer Claims

MAY 16 2017

Re: Our Client : [REDACTED]  
Vehicle : 2013 Ford Explorer  
VIN : 1FM5K7B8XDC [REDACTED]

To Whom It May Concern:

Please be advised that Sarah Ferguson (formerly [REDACTED]) has retained this office to represent her concerning the above-referenced vehicle. Please direct all communication concerning this matter through this office. The following is a demand that Ford Motor Company (Ford) provide Ms. [REDACTED] remedies pursuant to the Song-Beverly Consumer Warranty Act (Lemon Law) and the Consumer Legal Remedies Act (CLRA).

1. FACTS

On, or about, August 30, 2012, Ms. [REDACTED] purchased the vehicle brand new from Ken Grody Ford in Buena Park, California. The vehicle came with an implied warranty of merchantability from Ford. This implied warranty warranted that the vehicle was fit for its ordinary purpose and would pass without objection in the trade under the contract description.

Ford Motor Company  
May 10, 2017  
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On, or about, the year 2016 Ms. [REDACTED] discovered the vehicle contained a serious safety defect. Specifically, Ms. [REDACTED] discovered the vehicle leaked exhaust fumes into the vehicle's passenger compartment. Ford is aware of this defect and was aware of the defect when the vehicle was sold to Ms. [REDACTED]

## 2. LIABILITY

### A. Implied Warranty of Merchantability

The **Lemon Law** provides that every sale of a new consumer good at retail in the State of California is accompanied by an implied warranty of merchantability from the manufacturer. This implied warranty warrants that the consumer good is fit for its ordinary purpose and will pass without objection in the trade under the contract description.

Here, the vehicle was sold new to Ms. [REDACTED] at retail in the State of California. Therefore, the vehicle came with an implied warranty of merchantability from Ford.

The vehicle leaks exhaust fumes into the passenger compartment. Ford is aware of this defect and was aware of the defect when the vehicle was sold to Ms. [REDACTED]. Any vehicle that leaks exhaust fumes into the passenger compartment is not fit for its ordinary purpose which is to provide a safe environment for travel. In addition, any vehicle that leaks exhaust fumes into the passenger compartment will not pass without objection in the trade under the contract description.

Ford has breached the implied warranty related to the vehicle. As such, pursuant to the **Lemon Law** Ms. [REDACTED] is entitled to the price paid for the vehicle, including incidental and consequential damages. Ms. [REDACTED] is also entitled to the payment of reasonable attorney's fees.

### B. CLRA

It is a violation of the **CLRA** for any person to (1) misrepresent the source, sponsorship, approval or certification

Ford Motor Company  
May 10, 2017  
Page 3

of goods or services; (2) represent that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities which they do not have; or (3) represent that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another.

Here, as stated above, the vehicle leaks exhaust fumes into the passenger compartment. Ford is aware of this defect and was aware of this defect when the vehicle was sold to Ms. Ferguson.

Ford misrepresented to Ms. [REDACTED] the approval, characteristics, uses and benefits of the vehicle due to this exhaust leak issue. Further, Ford misrepresented that the vehicle was of a particular standard, quality or grade due to the exhaust leak issue.

Ford has violated the CLRA. As such, Ms. [REDACTED] demands that Ford correct, repair, replace, or rectify the goods or services due to this CLRA violation. Ms. [REDACTED] also demands that Ford pay reasonable attorney's fees pursuant to the CLRA.

Please be advised that Ms. [REDACTED] revokes acceptance of the vehicle due to the exhaust leak issue. Please be further advised that Ms. [REDACTED] rejects the vehicle due to the exhaust leak issue.

Please note if this matter is not resolved within 30 days of this letter's date, I will recommend that Ms. [REDACTED] file a lawsuit against Ford alleging, among other things, breach of implied warranty of merchantability in violation of the Lemon Law as well as violations of the CLRA.

Please be advised that Ms. [REDACTED] may have additional rights and remedies which have not been discussed in this writing.

Enclosed herein is a copy of the sale contract. I look

Ford Motor Company  
May 10, 2017  
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forward to your prompt attention to this matter.

Sincerely,  
  
David Farrell

DF/km  
Enclosure

cc: 

# Ken Grody



Phone: 714-521-3305  
 6211 Beach Blvd.  
 Buena Park, CA 90621  
 www.kengrodyford.com

Year/Make/Model: 2013 Ford Explorer		A/R Number:	Invoice Number
VIN: 1FM5K7B8X DC		Customer Number:	
License Number: [REDACTED] Color: Silver		PO Number:	Printed: MAY 16 17 1:35 PM
Stock Number: Z40243 Mileage In: 16217		Auth Number:	Copy # 2
Tag Number: [REDACTED] Mileage Out: 16218		Service Writer: Tim Prete	Date Opened: 04/20/13
Original Estimate: \$1.00 Original Estimate: 04/20/13		Terms & Conditions:	Date Notified: 04/20/13
		Type of Sale: Retail	Date Delivered: 04/20/13
		Customer Signature	

Incr. Amt	New Amt	Date	Time	Person Cont.	How Cont.	Phone	Cont. By	Reason/Description
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Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total
<b>1. Vehicle Concern</b>					
PERFORM MULTI POINT INSPECTIONS					
1 - Cause/Action to Take					
99P - MAINTENANCE					
1 - Correction/Action Taken					
PERFORMED MULTI POINT INSPECTION	187				0.00
Sub Total Parts					Internal Work
<b>2. Vehicle Concern</b>					
qcm 15k service. serv 0968 - USA 2012 NEW 60/60K PREM MAINT(M&W) 7.5K INTERVAL					
1 - Correction/Action Taken					
did 7.5k service	187				0.00
Part Number	Failed	Description			
FL500S		FILTER ASY - OIL	1	1	
XO5W20QSP		ENGINE OIL	6	6	
FA1884		AIR FLTR	1	1	
FP68		CABIN AIR FILTER	1	1	
Sub Total Parts					Service Contract
SubTotal Job # 2					Service Contract
<b>3. Vehicle Concern</b>					
TIRE PRESSURE					
TP -					
1 - Correction/Action Taken					
YOUR VEHICLE'S TIRE PRESSURE IS AS FOLLOWS	187				0.00
RF35					
LF35					
RR35					
LR35					



Notice to Consumer: Please read important information on back.

# Ken Grody



Phone: 714-521-3305  
 6211 Beach Blvd.  
 Buena Park, CA 90621  
 www.kengrodyford.com <sup>Page</sup><sub>2</sub>

Year/Make/Model: 2013 Ford Explorer VIN: 1FM5K7B8X DG [REDACTED] License Number: [REDACTED] Color: Silver Stock Number: Z40243 Mileage In: 16217 Tag Number: [REDACTED] Mileage Out: 16218		A/R Number: [REDACTED] Customer Number: [REDACTED] PO Number: Auth Number: Service Writer: Tim Prete Terms & Conditions: Type of Sale: Retail Customer Signature	Invoice Number: [REDACTED] Printed: MAY 16 17 1:35 PM Copy # 2 Date Opened: 04/20/13 Date Notified: 04/20/13 Date Delivered: 04/20/13
--	--	---	--

Incr. Amt	New Amt	Date	Time	Person Cont.	How Cont.	Phone	Cont. By	Reason/Description

Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total
Sub Total Parts					
Internal Work					

OWNER ADVANTAGE REWARDS ARE NOT APPLICABLE TO COUPONS, DISCOUNTED SPECIALS, AND BASIC MAINTENANCE. REWARDS CAN BE REDEEMED ON FULL RETAIL REPAIRS OR SERVICES. SIGN UP TODAY AND START RECEIVING 5% REWARD POINTS ON EVERY DOLLAR YOU SPEND. ASK SERVICE ADVISORS FOR FURTHER DETAILS.	Total Labor 0.00 Total Parts 0.00 Total Sublet 0.00 Misc. Chrgs 0.00 Car Rental 0.00 Freight 0.00 Deductible 0.00 Special Tax 0.00 Haz Mat Chrg 0.00 Sales Tax 0.00
INVOICES MUST BE PAID IN FULL BEFORE VEHICLE IS RELEASED. PARTS MUST BE PRE-PAID IF CLIENT IS PICKING UP VEHICLE BEFORE REPAIRS ARE DONE. CANCELLATION OF PARTS WILL BE SUBJECT TO A RESTOCKING FEE OF 20% OF THE RETAIL PRICE.	B.A.R. REG # 042846 E.P.A. # 02/946882
<b>AMOUNT DUE 0.00</b>	



Notice to Consumer: Please read important information on back.

Ken Grody Ford  
 6211 Beach Blvd  
 Buena Park CA 90621  
 (714) 521-3110



### Accounting Invoice

B.A.R. # EPA #

1

[Redacted] Whittier, CA [Redacted]	A/R Number:	Invoice Number
	Customer Number: [Redacted]	[Redacted]
	PO Number:	
	Auth Number:	Printed: 05/16/2017 1:35 PM
	Service Writer: Tim Prete	Copy # 2
	Estimate Amount: \$ 1.00	Date Opened: 04/20/13
	Terms & Conditions:	Date Notified: 04/20/13
	Type of Sale: Retail	Date Delivered: 04/20/13
<b>Customer Signature</b>		
Year/Make/Model: 2013 Ford Explorer		
VIN: 1FM5K7B8X DC [Redacted]		
License Number: [Redacted] Color: Silver		
Stock Number: Z40243 Mileage In: 16217		
Tag Number: [Redacted] Mileage Out: 16218		

DESCRIPTION	COST	HRS or QTY	LIST or LABOR	EXT TOTAL	GRAND TOTAL
<b>1. Customer statement of problem</b> SvcWtr: Tim Prete Job Added: 04/20/13 8:38 AM					
I/ PERFORM MULTI POINT INSPECTIONS					
1 -- Cause / Action to Take					
MAINTENANCE					
1 -- Correction / Action Taken					
PERFORMED MULTI POINT INSPECTION					0.00
Warranty ID Tech Iop Act Hr					
Sub Total Parts	0.00				0.00
SubTotal Job # 1					0.00
<b>2. Customer statement of problem</b> SvcWtr: Tim Prete Job Added: 04/20/13 8:38 AM					
S/ qcm 15k service. serv 0968 - USA 2012 NEW 60/60K PREM MAINT(M&W) 7.5K INTERVAL					
1 -- Correction / Action Taken					
did 7.5k service					52.00
Warranty ID Tech Iop Act Hr					
1271 187 Felipe Ramos Saldana	15.60	1.30	40.00	52.00	
Iop Part Number Failed Description					
1 FL500S FILTER ASY - OIL	4.39	1	4.94	4.94	
1 XO5W20QSP ENGINE OIL	4.04	6	4.55	27.30	
1 FA1884 AIR FLTR	11.37	1	12.79	12.79	
1 FP68 CABIN AIR FILTER	11.24	1	12.65	12.65	
Sub Total Parts	51.24				57.68
SubTotal Job # 2					109.68
Iop Ford Op Code CDC Con/Defect AC 1 AC 2 RDI ONP FLH OLI					
1 MB75000 1.30 0.00					
<b>3. Customer statement of problem</b> SvcWtr: Tim Prete Job Added: 04/20/13 8:38 AM					
I/ TIRE PRESSURE					
1 -- Correction / Action Taken					
YOUR VEHICLE'S TIRE PRESSURE IS AS FOLLOWS					0.00
RF35					
LF35					
RR35					
LR35					

Buena Park, CA



# Accounting Invoice

Whittier, CA

B.A.R. # EPA #

2

Year/Make/Model: 2013 Ford Explorer	A/R Number:	Invoice Number
VIN: 1FM5K7B8X DG	Customer Number:	1
License Number: 62 Color: Silver	PO Number:	Printed: 05/16/2017 1:35 PM
Stock Number: Z40243 Mileage In: 16217	Auth Number:	Copy # 2
Tag Number: Mileage Out: 16218	Service Writer: Tim Prete	Date Opened: 04/20/13
	Estimate Amount: \$ 1.00	Date Notified: 04/20/13
	Terms & Conditions:	Date Delivered: 04/20/13
	Type of Sale: Retail	
	<i>Customer Signature</i>	

DESCRIPTION	COST	HRS or QTY	LIST or LABOR	EXT TOTAL	GRAND TOTAL
Warranty ID Tech					
Sub Total Parts	0.00				0.00
SubTotal Job # 3					0.00

Acct	Acct Description	Proposed Amount	Cost Amount	Accounting Processed	Proposed Adjustment	Control	Control Description
1140	A/R - WARRANTY CL...	129.51	0.00	114.29	15.22	175268	
1140	A/R - WARRANTY CL...	-15.22	0.00	0.00	-15.22	175268	
6730	SERV - C/S INTERN R	2.40	0.00	2.00	0.40	175268	
1440	INV - LABOR IN PRO...	-2.40	0.00	-2.00	-0.40	175268	
5710	SERV - SLS ESP R.O...	-52.00	15.60	-52.00	0.00	175268	
6710	SERV - C/S ESP R.O...	15.60	0.00	13.00	2.60	175268	
1440	INV - LABOR IN PRO...	-15.60	0.00	-15.60	0.00	175268	
5440	PART - SLS ESP R.O...	-30.38	27.00	-30.38	0.00	175268	
5440	PART - C/S ESP R.O...	27.00	0.00	27.00	0.00	175268	
1400	INV - PARTS & ACCE...	-27.00	0.00	-27.00	0.00	175268	
5780	SERV - SLS GAS OIL	-27.30	24.24	-27.30	0.00	175268	
6780	SERV - C/S GAS OIL	24.24	0.00	24.24	0.00	175268	
1443	INV - GAS OIL & GREASE	-24.24	0.00	-24.24	0.00	175268	
2150	SALES & USE TAX P...	-4.61	0.00	-4.61	0.00	175268	

Original Estimate: \$ 1.00 Original Est. Date: 04/20/13

New Amt Incr. Amt Date Time Person Cont. How Cont. Phone Cont. By Reason/Description

Internal			Service Contract			Warranty			Customer Pay		
COST	Description	Retail	COST	Description	Retail	COST	Description	Retail	COST	Description	Retail
0.00	Labor	0.00	0.00	Labor	52.00	0.00	Labor	0.00	0.00	Labor	0.00
0.00	Parts	0.00	0.00	Parts	57.68	0.00	Parts	0.00	0.00	Parts	0.00
0.00	Sublet	0.00	0.00	Sublet	0.00	0.00	Sublet	0.00	0.00	Sublet	0.00
	Freight	0.00		Freight	0.00		Freight	0.00		Freight	0.00
	Car Rental	0.00		Car Rental	0.00		Car Rental	0.00		Car Rental	0.00
	Spec Tax	0.00		Deductible	0.00		Deductible	0.00		Deductible	0.00
	HazMat	0.00		Spec Tax	0.00		Spec Tax	0.00		Spec Tax	0.00
	Tax	0.00		Haz Mat	0.00		Haz Mat	0.00		Haz Mat	0.00
	Co-pay	0.00		Tax	4.61		SlsTax	0.00		Sls Tax	0.00
	Charge \$	0.00		Charge \$	0.00		Charge \$	0.00		Misc	0.00
	Misc	0.00		Misc	0.00		Misc	0.00		Misc	0.00
	Balance	0.00		Balance	114.29		Balance	0.00		Amt Due	0.00

# Ken Grody



Phone: 714-521-3305  
 6211 Beach Blvd.  
 Buena Park, CA 90621  
 www.kengrodyford.com Page 1

[Redacted] Whittier, CA [Redacted]	A/R Number: Customer Number: [Redacted] PO Number: Auth Number: Service Writer: Tim Prele Terms & Conditions: Type of Sale: Retail	Invoice Number: [Redacted] Printed: MAY 16 17 1:36 PM Copy # 2 Date Opened: 04/14/14 Date Notified: 04/15/14 Date Delivered: 04/16/14
Year/Make/Model: 2013 Ford Explorer VIN: 1FM5K7B8X DG [Redacted] License Number: [Redacted] Color: Silver Stock Number: Z40243 Mileage In: 38275 Tag Number: 1 [Redacted] Mileage Out: 38276		

Incr. Amt	New Amt	Date	Time	Person Cont.	How Cont.	Phone	Cont. By	Reason/Description
								Original Estimate:\$ 0.01 Original Estimate:04/14/14

Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total																									
<b>1. Vehicle Concern</b>																														
PERFORM MULTI POINT INSPECTIONS <i>1 - Cause/Action to Take</i> 99P - MAINTENANCE <i>1 - Correction/Action Taken</i> PERFORMED MULTI POINT INSPECTION	187				0.00																									
<u>Sub Total Parts</u>					<u>Internal Work</u>																									
<b>2. Vehicle Concern</b>																														
Customer states QCM 15K 0968 - USA 2012 NEW 60/60K PREM MAINT(M&W) 7.5K INTERVAL  <i>1 - Correction/Action Taken</i> PERFORMED 15K SERVICE CHANGED OIL AND OIL FILTER ROTATED TIRES REPLACED AIR FITLER AND CABIN AIR FILTER	187				0.00																									
<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Part Number</th> <th style="text-align: left;">Failed</th> <th style="text-align: left;">Description</th> <th style="text-align: center;">Qty</th> <th style="text-align: center;">Price</th> </tr> </thead> <tbody> <tr> <td>FL500S</td> <td></td> <td>FILTER ASY - OIL</td> <td style="text-align: center;">1</td> <td style="text-align: center;">1</td> </tr> <tr> <td>XO5W20QSP</td> <td></td> <td>ENGINE OIL</td> <td style="text-align: center;">6</td> <td style="text-align: center;">6</td> </tr> <tr> <td>FA1884</td> <td></td> <td>AIR FLTR</td> <td style="text-align: center;">1</td> <td style="text-align: center;">1</td> </tr> <tr> <td>FP68</td> <td></td> <td>CABIN AIR FILTER</td> <td style="text-align: center;">1</td> <td style="text-align: center;">1</td> </tr> </tbody> </table>	Part Number	Failed	Description	Qty	Price	FL500S		FILTER ASY - OIL	1	1	XO5W20QSP		ENGINE OIL	6	6	FA1884		AIR FLTR	1	1	FP68		CABIN AIR FILTER	1	1					
Part Number	Failed	Description	Qty	Price																										
FL500S		FILTER ASY - OIL	1	1																										
XO5W20QSP		ENGINE OIL	6	6																										
FA1884		AIR FLTR	1	1																										
FP68		CABIN AIR FILTER	1	1																										
<u>Sub Total Parts</u>																														
SubTotal Job # 2					<u>Service Contract</u> <u>Service Contract</u>																									
<b>3. Vehicle Concern</b>																														
Customer States PERFORM RECALL 13S04 FUEL DELIVERY MODULE REPLACEMENT																														



Notice to Consumer: Please read important information on back.

# Ken Grody



Phone: 714-521-3305  
 6211 Beach Blvd.  
 Buena Park, CA 90621  
 www.kengrodyford.com <sup>Page</sup> 2

Whittier, CA		A/R Number:	Invoice Number:
[Redacted]		Customer Number:	[Redacted]
[Redacted]		PO Number:	Printed: MAY 16 17 1:36 PM
[Redacted]		Auth Number:	Copy # 2
Year/Make/Model: 2013 Ford Explorer		Service Writer: Tim Prete	Date Opened: 04/14/14
VIN: 1FM5K7B8X DG [Redacted]		Terms & Conditions:	Date Notified: 04/15/14
License Number: [Redacted] Color: Silver		Type of Sale: Retail	Date Delivered: 04/16/14
Stock Number: Z40243 Mileage In: 38275		<b>Customer Signature</b>	
Tag Number: [Redacted] Mileage Out: 38276			

Original Estimate: \$0.01		Original Estimate: 04/14/14	
<u>Incr. Amt</u>	<u>New Amt</u>	<u>Date</u>	<u>Reason/Description</u>

Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total
1 -- Correction/Action Taken REPLACED FUEL PUMP ASY AS PER RECALL 13S04 Part Number Failed Description DB5Z9A407A PUMP ASY FUEL 4L3Z9276AA GASKET Sub Total Parts SubTotal Job # 3	123				0.00
4. Vehicle Concern RENTAL CAR FROM ENTERPRISE PO # RENTAL - 1 -- Correction/Action Taken PO#230783 APP# PBMVT Sublet 95 Sub Total Parts SubTotal Job # 4	500				0.00
5. Vehicle Concern TIRE PRESSURE. TP - 1 -- Correction/Action Taken YOUR VEHICLE'S TIRE PRESSURE IS AS FOLLOWS RF35 LF35 RR35 LR35	187				0.00



Notice to Consumer: Please read important information on back.

# Ken Grody



Phone: 714-521-3305  
 6211 Beach Blvd.  
 Buena Park, CA 90621  
 www.kengrodyford.com <sup>Page</sup><sub>3</sub>

[Redacted]		A/R Number:	[Redacted]	Invoice Number	[Redacted]
Whittier, CA [Redacted]		Customer Number:	[Redacted]	Printed: MAY 16 17 1:36 PM	
[Redacted]		PO Number:		Copy #	2
		Auth Number:		Date Opened:	04/14/14
Year/Make/Model: 2013 Ford Explorer		Service Writer:	Tim Prete	Date Notified:	04/15/14
VIN: 1FM5K7B8X DG [Redacted]		Terms & Conditions:		Date Delivered:	04/16/14
License Number: [Redacted] Color: Silver		Type of Sale:	Retail		
Stock Number: Z40243 Mileage In: 38275		<b>Customer Signature</b>			
Tag Number: [Redacted] Mileage Out: 38276					

Incr. Amt	New Amt	Date	Time	Person Cont.	How Cont.	Phone	Cont. By	Reason/Description
								Original Estimate:\$ 0.01 Original Estimate:04/14/14

Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total
Sub Total Parts					Internal Work

OWNER ADVANTAGE REWARDS ARE NOT APPLICABLE TO COUPONS, DISCOUNTED SPECIALS, AND BASIC MAINTENANCE. REWARDS CAN BE REDEEM ON FULL RETAIL REPAIRS OR SERVICES. SIGN UP TODAY AND START RECEIVING 5% REWARD POINTS ON EVERY DOLLAR YOU SPEND. ASK SERVICE ADVISORS FOR FURTHER DETAILS.		Total Labor	0.00
		Total Parts	0.00
		Total Sublet	0.00
		Misc. Chrgs	0.00
		Car Rental	0.00
		Freight	0.00
		Deductible	0.00
		Special Tax	0.00
		Haz Mat Chrg	0.00
		Sales Tax	0.00
		<b>AMOUNT DUE</b>	<b>0.00</b>

0211 Beach Blvd  
Buena Park, CA



### Accounting Invoice

B.A.R. # EPA #

Whittier, CA 9	A/R Number:	Invoice Number:
	Customer Number:	35
	PO Number:	
	Auth Number:	Printed: 05/16/2017 1:36 PM
	Service Writer: Tim Prete	Copy # 2
	Estimate Amount: \$ 0.01	Date Opened: 04/14/14
	Terms & Conditions:	Date Notified: 04/15/14
	Type of Sale: Retail	Date Delivered: 04/16/14
Customer Signature		
Year/Make/Model: 2013 Ford Explorer		
VIN: 1FM5K7B8X DG		
License Number: 2 Color: Silver		
Stock Number: Z40243 Mileage In: 38275		
Tag Number: Mileage Out: 38276		

DESCRIPTION	COST	HRS or QTY	LIST or LABOR	EXT TOTAL	GRAND TOTAL
<b>1. Customer statement of problem</b> SvcWtr: Tim Prete Job Added: 04/14/14 2:18 PM					
I/ PERFORM MULTI POINT INSPECTIONS					
1 -- Cause / Action to Take					
MAINTENANCE					
1 -- Correction / Action Taken					
PERFORMED MULTI POINT INSPECTION					
Warranty ID		Tech	lop Act Hr		0.00
			Sub Total Parts	0.00	0.00
					<b>SubTotal Job # 1</b>
					<b>0.00</b>
<b>2. Customer statement of problem</b> SvcWtr: Tim Prete Job Added: 04/14/14 2:18 PM					
S/ Customer states QCM 15K 0968 - USA 2012 NEW 60/60K PREM MAINT(M&W) 7.5K INTERVAL					
1 -- Correction / Action Taken					
PERFORMED 15K SERVICE					
CHANGED OIL AND OIL FILTER					
ROTATED TIRES					
REPLACED AIR FITLER AND CABIN AIR FILTER					
Warranty ID		Tech	lop Act Hr		
1271		187 Felipe Ramos Saldana	1 0.00	15.60 1.30 40.00	52.00
lop Part Number	Failed	Description			
1 FL500S		FILTER ASY - OIL	4.39 1	4.94	4.94
1 XO5W20QSP		ENGINE OIL	4.05 6	4.56	27.36
1 FA1884		AIR FLTR	11.37 1	12.79	12.79
1 FP68		CABIN AIR FILTER	11.24 1	12.65	12.65
			Sub Total Parts	51.30	57.74
					<b>SubTotal Job # 2</b>
					<b>109.74</b>
lop Ford Op Code	CDC	Con/Defect	AC 1	AC 2	RDI ONP FLH OLI
1 MBASIC					0.80 0.00
2 MBASIC1					0.20 0.00
3 MBASIC2					0.20 0.00
4 MBASIC4					0.10 0.00
<b>3. Customer statement of problem</b> SvcWtr: Tim Prete Job Added: 04/14/14 2:18 PM					
W/ - Customer States PERFORM RECALL 13S04 FUEL DELIVERY MODULE REPLACEMENT					



Ken Greedy Ford  
 Buena Park, CA  
 Whittier, CA

### Accounting Invoice

B.A.R. # EPA #

Year/Make/Model: 2013 Ford Explorer	A/R Number:	Invoice Number
VIN: 1FM5K7B8X DG	Customer Number: 1	
License Number: Z40243	PO Number:	
Color: Silver	Auth Number:	Printed: 05/16/2017 1:36 PM
Stock Number: Mileage In: 38275	Service Writer: Tim Prete	Copy # 2
Tag Number: Mileage Out: 38276	Estimate Amount: \$ 0.01	Date Opened: 04/14/14
	Terms & Conditions:	Date Notified: 04/15/14
	Type of Sale: Retail	Date Delivered: 04/16/14
	<i>Customer Signature</i>	

DESCRIPTION	COST	HRS or QTY	LIST or LABOR	EXT TOTAL	GRAND TOTAL
<i>1 -- Correction / Action Taken</i>					
REPLACED FUEL PUMP ASY AS PER RECALL 13S04					<u>237.23</u>
Warranty ID 5824 Tech 123 Jason Nixon lop Act Hr 1 0.00	66.00	2.20	107.83	237.23	
lop Part Number Failed Description					
1 DB5Z9A407A PUMP ASY FUEL	60.86	1	85.20	85.20	
1 4L3Z9276AA GASKET	8.92	1	12.49	12.49	
Sub Total Parts	<u>69.78</u>				<u>97.69</u>
Sub Total Job # 3					<u>334.92</u>
lop Ford Op Code CDC Con/Defect AC 1 AC 2 RDI ONP FLH OLI					
1 13S04D 2.20 0.00					
<i>4. Customer statement of problem</i>					
S/ RENTAL CAR FROM ENTERPRISE					
PO #					
SvcWtr: Tim Prete Job Added: 04/14/14 2:18 PM					
<i>1 -- Correction / Action Taken</i>					
PO#230783 APP# PBMVT					<u>0.00</u>
Warranty ID 0000 Tech 500 Tech Sublet lop Act Hr 1 0.00	0.00	0.00	0.00	0.00	
Sub Total Parts	<u>0.00</u>				<u>0.00</u>
Sublets					
95 ENTERPRISE RENT A CAR	<u>90.01</u>				<u>90.01</u>
Sub Total Job # 4					<u>90.01</u>
<i>5. Customer statement of problem</i>					
I/ TIRE PRESSURE.					
SvcWtr: Tim Prete Job Added: 04/14/14 2:18 PM					
<i>1 -- Correction / Action Taken</i>					
YOUR VEHICLE'S TIRE PRESSURE IS AS FOLLOWS					<u>0.00</u>
RF35					
LF35					
RR35					
LR35					
Warranty ID Tech lop Act Hr					
Sub Total Parts	<u>0.00</u>				<u>0.00</u>

[Redacted]  
Buena Park, CA [Redacted]



### Accounting Invoice

B.A.R. # EPA #

3

[Redacted] Whittier, CA [Redacted]	A/R Number: [Redacted]	Invoice Number: [Redacted]
[Redacted]	Customer Number: [Redacted]	[Redacted]
[Redacted]	PO Number: [Redacted]	Printed: 05/16/2017 1:36 PM
[Redacted]	Auth Number: [Redacted]	Copy # 2
[Redacted]	Service Writer: Tim Prete	Date Opened: 04/14/14
[Redacted]	Estimate Amount: \$ 0.01	Date Notified: 04/15/14
[Redacted]	Terms & Conditions:	Date Delivered: 04/16/14
[Redacted]	Type of Sale: Retail	
[Redacted]	<b>Customer Signature</b>	

Year/Make/Model: 2013 Ford Explorer  
VIN: 1FM5K7B8X DG [Redacted]  
License Number: [Redacted] Color: Silver  
Stock Number: Z40243 Mileage In: 38275  
Tag Number: [Redacted] Mileage Out: 38276

DESCRIPTION	COST	HRS or QTY	LIST or LABOR	EXT TOTAL	GRAND TOTAL
<b>SubTotal Job # 5</b>					<b>0.00</b>

Acct	Acct Description	Proposed Amount	Cost Amount	Accounting Processed	Proposed Adjustment	Control	Control Description
1140	A/R - WARRANTY CL...	204.37	0.00	539.29	-334.92	206635	
1140	A/R - WARRANTY CL...	334.92	0.00	0.00	334.92	206635	
6730	SERV - C/S INTERN R...	2.40	0.00	2.40	0.00	206635	
1440	INV - LABOR IN PRO...	-2.40	0.00	-2.40	0.00	206635	
5710	SERV - SLS ESP R.O...	-52.00	15.60	-52.00	0.00	206635	
6710	SERV - C/S ESP R.O...	15.60	0.00	15.60	0.00	206635	
1440	INV - LABOR IN PRO...	-15.60	0.00	-15.60	0.00	206635	
5720	SERV - SLS WARR R.O...	-237.23	66.00	-237.23	0.00	206635	
6720	SERV - C/S WARR R.O...	66.00	0.00	66.00	0.00	206635	
1440	INV - LABOR IN PRO...	-66.00	0.00	-66.00	0.00	206635	
5750	SERV - SLS SUBLET ...	-90.01	90.01	-90.01	0.00	206635	
6750	SERV - C/S SUBLET ...	90.01	0.00	90.01	0.00	206635	
1441	INV - SUBLET REPAIRS	-90.01	0.00	-90.01	0.00	206635	
5440	PART - SLS ESP R.O...	-30.38	27.00	-30.38	0.00	206635	
6440	PART - C/S ESP R.O...	27.00	0.00	27.00	0.00	206635	
1400	INV - PARTS & ACCE...	-27.00	0.00	-27.00	0.00	206635	
5780	SERV - SLS GAS OIL ...	-27.36	24.30	-27.36	0.00	206635	
6780	SERV - C/S GAS OIL ...	24.30	0.00	24.30	0.00	206635	
1443	INV - GAS OIL & GREASE	-24.30	0.00	-24.30	0.00	206635	
5460	PART - SLS WARRAN...	-97.69	69.78	-97.69	0.00	206635	
6460	PART - C/S WARRAN...	69.78	0.00	69.78	0.00	206635	
1400	INV - PARTS & ACCE...	-69.78	0.00	-69.78	0.00	206635	
2150	SALES & USE TAX P...	-4.62	0.00	-4.62	0.00	206635	

Original Estimate: \$0.01 Original Est. Date: 04/14/14

New Amt Incr. Amt Date Time Person Cont. How Cont. Phone Cont. By Reason/Description

Internal		Service Contract		Warranty		Customer Pay		
COST	Description	Retail	COST	Description	Retail	COST	Description	Retail
0.00	Labor	0.00	0.00	Labor	52.00	0.00	Labor	0.00
0.00	Parts	0.00	0.00	Parts	57.74	0.00	Parts	0.00
0.00	Sublet	0.00	0.00	Sublet	90.01	0.00	Sublet	0.00
	Freight	0.00		Freight	0.00		Freight	0.00
	Car Rental	0.00		Car Rental	0.00		Car Rental	0.00
	Spec Tax	0.00		Deductible	0.00		Car Rental	0.00
	HazMat	0.00		Spec Tax	0.00		Deductible	0.00
	Tax	0.00		Haz Mat	0.00		Spec Tax	0.00
	Co-pay	0.00		Tax	4.62		Haz Mat	0.00
	Charge \$	0.00		Charge \$	0.00		Sls Tax	0.00
	Misc	0.00		Misc	0.00		Misc	0.00
	Balance	0.00		Balance	204.37		Amt Due	0.00



## Case Print Report

Case Number [REDACTED] 7

Case Opened Date 5/5/2017 6:31 PM

Case Closed Date 5/5/2017 6:33 PM

Case Status Resolved

Case Last Modified 5/5/2017 6:33 PM

Responsible Team Tier 1 Inbound

Case Classification Legal > Alleged Injury due to Product Defect or Airbag > Fin Assist for Medical Expenses

Customer Name [REDACTED]

Customer Number 1 [REDACTED]

LIZELLA

GA [REDACTED]

Email [REDACTED]

Dealer Riverside Ford Lincoln

VIN 1FM5K7D83F [REDACTED]

Year 2015

Make FORD

Model EXPLORER

Body Style K7D - EXPLORER XLT FWD 4-DR

### Symptom

Level 1 Comfort & Entertainment

Level 2 Interior Odor

Level 3 OTHER

Level 4 OTHER

# Case Print Report

Case Number [REDACTED]

Agent Name	Note Created On
Alfred Currier	5/5/2017 6:32 PM

CUST SAYS:

N/A

OBC to Customer [REDACTED]

Customer became very ill when she and her husband took a 300mi trip to visit family for Easter Weekend.

PER CUST, DLR SAYS:

After the diag to determine the cause of Mrs. [REDACTED] sickness, they discovered that there is a exhaust leak going into the cab of the vehicle. Dir has the parts on order and is just waiting for them to initiate the repairs.

CRC ADVISED:

I will forward your information to Ford's Office of the General Counsel. You should receive a written response within 15 Days business days to your concern.

Notes to CSR:

\* Please verify customer's street address or P.O. Box.

\* If the customer does NOT have their VIN, but the vehicle is at a dealership, please make an OBC to obtain the VIN.

\* If the customer does NOT have their VIN and the vehicle is not at a dealership, please schedule a follow up with the customer to obtain it.

\* Do not use GENERAL for a symptom code unless this is a call back request for an OGC missed follow-up.

\* Copy and paste both the following Questions and Answers into case notes to the aid OGC's investigation:

ACCIDENT/INJURY TEMPLATE (ensure you document both the question and answers in the case notes)

1. Has the customer filed a claim with their insurance company? (Yes or No)

No

If YES, continue with remaining questions.

If NO, advise customer to contact their insurance company (No further questions are needed an escalation to OGC will not occur).

If customer does not have insurance, or is refusing to contact insurance - continue with remaining questions.

2. If a claim has been filed with their insurance company, what is the status of the claim?

N/A

3. Is the vehicle repairable?

Yes

4. Were any injuries sustained? If yes, provide the first and last name of all injured parties.

## Case Print Report

Case Number [REDACTED]

Yes- [REDACTED] is sick from the exhaust

5. What are you seeking from Ford Motor Company?

Help with hospital bills if [REDACTED] has to go to the hospital

6. What was the date of the accident?

4/15/17- 4/16-17 (easter Weekend)

7. What product defect is alleged to have caused the accident?

exhaust leak in the vehicle (from Dealer diag)

8. What is the city and state where the accident occurred?

Corneila, GA

9. Was a police report filed?

No

10. If a police report was filed, what were the findings?

N/A

11. What is the police report number and in what city and county was the report filed?

N/A

12. What is the name and address of the customer's attorney (Ask this question only if the customer mentions they have sought/retained an attorney)?

N/A

13. What mailing address would you like our Office of General Council to send your written response to (Document the full address)?

[REDACTED] Lizella, GA [REDACTED]

## Case Print Report

Case Number [REDACTED]

Activity Modified By	Activity Last Modified	Activity Type	Activity Subject
Alfred Carrier	5/5/2017 6:33 PM	fmc_closecase	Close Case
Alfred Carrier	5/5/2017 6:33 PM	incidentresolution	Case Resolution



\*\*\*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](mailto: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 \*\*\*

PRIVILEGED AND CONFIDENTIAL

This email contains privileged and confidential communications.

If you received it in error, please delete it immediately and notify the sender.

**From:** DCPFORM, FMCDDealer (.)  
**Sent:** Friday, May 19, 2017 5:09 PM  
**To:** Ordcalp, F (F.); Taylor, Alma (A.)  
**Cc:** [cathy@sharpnackforddirect.com](mailto:cathy@sharpnackforddirect.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:** Sharpnack Ford, Inc.  
**Requesting Dealer Fleet:** Sharpnack Ford, Inc.  
**PA Code:** 01262  
**Contact Person:** Cathy Cronenwett  
**Title:** Service Manager  
**Phone Number:** 4199353914  
**Fax Number:** 4199351837  
**Email:** [cathy@sharpnackforddirect.com](mailto:cathy@sharpnackforddirect.com)  
**Region:** Pittsburgh  
**Address:** 1200 S. Conwell Ave.  
**City:** Willard  
**State:** Ohio  
**Zip Code:** 44890

**CUSTOMER VEHICLE INFORMATION:**

**Warranty Start Date:** 02/28/2017  
**Vehicle Year:** 2017  
**Vehicle Model:** Explorer  
**Vehicle VIN:** 1F1M5K8GT9HG1  
**Mileage:** 3085  
**customer Fleet Name:** [REDACTED]  
**Street Address:** [REDACTED]  
**City :** Willard  
**State :** Ohio  
**Zip Code :** [REDACTED]  
**Home Phone:** [REDACTED]  
**Work Phone:** [REDACTED]  
**Customer Region:** Pittsburgh

**DETAILS OF INCIDENT:**

**Medical Attention Sought:**  
**Date of Incident:** 2017-05-02  
**County incident occurred:** HURION

Is customer alleging a component defect CAUSED the incident? YES

**Details:** Exhaust fumes in the vehicle causing headaches

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:** WILLARD OHIO

**Attorney information:**

**CVO Contact:**

**Resolution Customer is seeking:** Fix the vehicle. There is a new TSB that relates to the customers exact concern. that was not available when the customer initially came in. A new muffler has been ordered per the TSB to correct the concern.

**Comments:** If we could have just gotten the information that Ford was coming up with a TSB to correct the concern. They just want the vehicle fixed.

**Report# :** [REDACTED] **Received:** 05/12/2017  
**CCRG/EPRC:** [REDACTED] **Reviewed Status:** [REDACTED] **Date:** [REDACTED]  
**Vehicle:** 2017,EXPLORER 4X4 (U502) ,SPORT ,4 DOOR ,MPV ,1FM5K8GT9HG [REDACTED] **Build Date:** 12/02/2016  
**Odometer :** 3,100 M **Engine:** 3.5L-GTDI **Calibration:** GUB1G10A  
**Transmission:** 6F55 **Axle:** [REDACTED] **A/C:** YES  
**Dealer:** USA 01262 Sharpnack Ford, Inc. **Phone#:** 419-935-4571  
**City:** Willard **State:** Ohio **Country :** USA  
**Originator:** [REDACTED]  
**Symptom:** 8 89 5 00 SAFE/SEC,SMOKE/ODOR,EXHAUST,UNKNOWN  
**Status:** [REDACTED]  
**VFG:** V99 ALL OTHER  
**Additional Symptom:** [REDACTED]  
**Fix:** Causal Component : [REDACTED]  
**Condition Code:** [REDACTED]  
**Cust:** [REDACTED] **Home Phone:** ( ) [REDACTED]  
**Work Phone:** ( ) [REDACTED] **Region:** G4 Pittsburgh  
**Case Status:** [REDACTED] **Date:** 00 / 00 / 0000 **Vehicle Paint:** ABSOLUTE BLACK

**OWNREL 05/10/2017 07:59PM**

CUST. SAYS: Just bought Explorer in Feb. and right off the bat noticed the exhaust fumes. Took it to dlr and dlr is doing everything FMC said to do. Everything dlr does does not work. I need something done about it because we all got so sick from previous trip and we need it fixed. I spent alot of money on this vehicle and Im very mad about it. If something is not done, I will call an attorney.PER CUST./DLR SAYS:N/ACRC ADVISED: I will escalate your case/request to our Ford Regional Customer Service Manager who works daily with your dealerships 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 [REDACTED]

**OWNREL 05/10/2017 08:00PM**

BEST CONTACT METHOD: MOBILE: [REDACTED]

**OWNREL 05/11/2017 11:59AM**

Email Created On: 5/11/2017 11:59:30 AM From: FMC360 Email Subscription To: [REDACTED]  
 Subject: Contact to Ford Motor Company RE: [REDACTED]

1FM5K8GT9HGB [REDACTED] Dear [REDACTED] This email is to confirm your recent contact to Ford Motor Company regarding your 2017EXPLORER. You will receive contact from our regional Customer Service Manager (CSM) within 1 business day to introduce themselves and develop an action plan to address your concern. Your case number, along with the contact information for the regional Customer Service Manager is listed below. Case Number: [REDACTED] CSM Name: Judy Wolfe CSM Phone: 866-631-3788 x77743 CSM Email: JWOLFE43@ford.com

Sincerely, Ford Motor Company Customer Care Team

**OWNREL 05/11/2017 05:32PM**

Email Created On: 5/11/2017 5:32:02 PM From: To: Subject: [REDACTED]  
 [REDACTED] 2017 EXPLORER 1FM5K8GT9HG [REDACTED] Good afternoon  
 Cathy The customer opened a case, do we currently have the vehicle If yes, please  
 send me a copy of the open RO. I see that TAC advised you to contact OGC, have  
 you completed the form If I can be of any assistance please let me know. Thanks for  
 your help Judy Ford Motor Company (r) Judy Wolfe | Customer Service Manager |  
 FCSDeFax: (866) 530-0888 Ford Confidentiality: This email may contain privileged  
 communications. If you have received it in error, please delete it immediately and  
 notify the sender. For security reasons, please do not submit any sensitive personally  
 identifiable information, such as credit card numbers, driver license number, SSN,  
 DOB, etc. Thank you

**OWNREL 05/11/2017 05:52PM**

Sharpnack Ford, Inc. [REDACTED] Ticket Number: [REDACTED]  
 [REDACTED] business phone [REDACTED]  
 [REDACTED] home phone: [REDACTED] Mobile phone: [REDACTED] core:  
 92 Vehicle Purchase Status: Original Owner Dealer name: Sharpnack Ford, Inc. Dealer  
 P&A: 01262 Dealer phone: (419) 935-4571 VIN: 1FM5K8GT9 HC [REDACTED] Year :  
 2017 Make: FORD Model: EXPLORER Mileage: 3100 Warranty Start Date:  
 2/28/2017 Engines Specification: 3.5L-4V DOHC T/C V6 GAS 350HP Open Recall/FSA:  
 NONE LISTED ESP: NONE LISTED Hotline Contact: HSCGC002 5/3/17 fuel odor in  
 vehicle advised to contact OGC Warranty History: 3/10/17 brakes grinding Csm Judy  
 Ann x 77743 case review GVW 2/28/17 ENGINE TYPE GAS CONFIRM TYPE OF SALE  
 RETAIL STATE PURCHASED OH STATE REGISTERED OH SELLING DEALER SHARPNACK  
 FORD Csm Judy x77743 email to dealer CATHY@SHARPNACKFORDDIRECT.COM  
 Good afternoon Cathy The customer opened a case, do we currently have the vehicle  
 If yes, please send me a copy of the open RO. I see that TAC advised you to contact  
 OGC, have you completed the form If I can be of any assistance please let me know.  
 Thanks for your help Csm Judy x77743 out bound call to customer Ms. Osborne @  
 [REDACTED] customer I see you are having a concern with your vehicle. customer  
 says we are getting fumes from the exhaust, Csm says Im sorry, I see you stated it  
 is making you sick. Customer says we took a trip to NY we got headaches,  
 nauseated and we got dizzy and sick, the same thing happened to coming home, It  
 happens when are driving at high speeds we only drive it around town. We are  
 driving our new F-150. We got a call today from the dealer that they confirmed the  
 issued and a Ford engineer told them to release it back to us because they cant find  
 a way to fix it, we have to get something done or we will hire a lawyer. Csm says Im  
 sorry I wasnt aware that the dealer was releasing the vehicle back to you today, I  
 need to reach to them again. Csm offers to follow up on Friday 5/12/17 with our  
 next steps. Customer says do we pick it up today or wait until tomorrow. Csm says I  
 cant tell you what to do, that is something you need to decide on. customer says we  
 will wait to hear from you tomorrow. Csm Judy x77743 out bound call to dealer  
 (419) 935-4571 left message for service manager Cathy advising I talked with Ms.  
 [REDACTED] and she says that an engineer told you to release the car back to the  
 customer. I see where TAC asked you to contact OGC, have you done that, have  
 heard back from them Csm setting follow up to call dealer to get update on releasing  
 the vehicle and calling the customer with next steps on Friday 5/12/17 by close of  
 business. NEXT STEP Call dealer for update on releasing the vehicle Call customer with  
 next steps

**OWNREL 05/11/2017 07:47PM**

Email Created On: 5/11/2017 7:47:21 PM From: Robin Koska To: Mackenzie  
 McPherson-Fair Subject: Review Coach Back Activity on [REDACTED]  
 [REDACTED] Dear Mackenzie McPherson-Fair, One of your employees

received a Coach Back Activity in FMC360. Please review this item:  
[https://mss360.ford.prod.ams.hpmsdynamics.com/main.aspxetc=10184&extraqs=%3F\\_gridType%3D10184%26etc%3D10184%26id%3D%257B392C8037-8136-E711-BB30-441EA15550E5%257D&pagetype=entityrecord](https://mss360.ford.prod.ams.hpmsdynamics.com/main.aspxetc=10184&extraqs=%3F_gridType%3D10184%26etc%3D10184%26id%3D%257B392C8037-8136-E711-BB30-441EA15550E5%257D&pagetype=entityrecord)

**OWNREL 05/12/2017 12:43PM**

CSM Heather assisting CSM Judy 77743CSM made an OBC to Cathy SM @ 419-935-4571. Cathy advised has not contacted OGC. Cathy advised contacted FSE who provided recommendations for repairs. Cathy advised had to remove rear bumper to see where exhaust was coming from. Cathy advised there were open areas where the exhaust was going and blocking it off to see if it is being taken care of. Cathy advised we are still checking to see if this is address and the tech feels this is going to fix this. Cathy advised should be completed today.

**OWNREL 05/12/2017 01:30PM**

CSM Heather assisting CSM Judy 77743CSM made an OBC to cust @ [REDACTED]. CSM advised did speak with the dirshp this morning and they are working on it and expects to have it resolved today. Cust says she was told this same information Wednesday and was told it would be done yesterday. CSM advised we will F/U Tues 05/16 to confirm veh is repaired. Next step: F/U 05/16 to confirm veh is repaired

**OWNREL 05/16/2017 07:33PM**

Email Created On: 5/16/2017 7:33:49 PM From: [REDACTED] To: Judy Wolfe Subject: RE: [REDACTED] 2017 EXPLORER 1FM5K8GT9HG [REDACTED] RM:03006000031441 It is here, and we did verify the concern. We had talked to FSE Rob Heater and he did give us some directions to follow to correct the concern, as the customer said they just wanted their vehicle fixed.

**OWNREL 05/16/2017 08:40PM**

Email Created On: 5/16/2017 4:40:44 PM From: Judy Wolfe To: [REDACTED] Subject: [REDACTED] Cathy Cronenwett, cathy@sharpnackforddirect.com Subject: [REDACTED] G6C [REDACTED] I just spoke with Ms [REDACTED] and she advised the smell is still there. I asked if she was going to take it back to the dealer, she said she was told by the dealer to talk to me before she brought it back. I assume it is regards to getting an FSE to the dealer. Regrettably I am not able to request an FSE, this is a dealer resource. Please follow the process to request one. Thanks Judy Ford Motor Company (r) Judy Wolfe | Customer Service Manager | FCSDeFax: (866) 530-0888 Ford Confidentiality: This email may contain privileged communications. If you have received it in error, please delete it immediately and notify the sender. For security reasons, please do not submit any sensitive personally identifiable information, such as credit card numbers, driver license number, SSN, DOB, etc. Thank you

**OWNREL 05/16/2017 08:44PM**

Csm Judy x77743 out bound call to dealer [REDACTED]. Csm called customer by mistake. Csm says Im sorry I was calling the dealer and I called the wrong number. do you have your vehicle back Customer says yes I we picked it up on Friday we drove it over the weekend and the exhaust smell is still there, they told me if we bring it back they need to get an engineer down here. Csm says Im sorry I didnt know this and Im sorry you still have the concern. Csm asks when will you take it back to the dealer Customer says they told us to talk to you before I bring it back. Csm says I will call the dealer and see what they are asking and the engineer is a dealer resource. Customer says i am getting frustrated the dealer has been great but Ford needs to step in and get it fixed and stand behind their product. we have talked with a lawyer. Csm asks have you hired the lawyer. Customer says not yet. Csm apologizes again for calling her before I spoke with the dealer and set a follow up for Wednesday 5/24/17 by close of business. customer asks do you know if this is

a problem with this car. csm advised in the cases in the region I handle I dont have anyone having this complaint. Customer thanks csm. Csm Judy x77743 out bound call to dealer (419) 935-4571 service manager not available, left message for service advisor for Nick to call me regarding case. Csm Judy x77743 email to dealer CATHY@SHARPBACKFORDDIRECT.COM Cathy I just spoke with Ms. [REDACTED] and she advised the smell is still there. I asked if she was going to take it back to the dealer, she said she was told by the dealer to talk to me before she brought it back. I assume it is regards to getting an FSE to the dealer. Regrettably I am not able to request an FSE, this is a dealer resource. Please follow the process to request one. Thanks Csm has follow up set for Wednesday 5/24/17 to call customer with update. Csm will send dealer an email also NEXT STEPEmail dealer & call customer with update

**Requester:** ATAYLO29

Report Summary

**Server:** ECCVWS962**Ford Proprietary, Private**

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22-May-2017

**Retention:** None

<b>Report# :</b>	[REDACTED]	<b>Received:</b>	05/03/2017
<b>CCRG/EPRC:S</b>		<b>Reviewed Status:</b>	<b>Date:</b>
<b>Vehicle:</b>	2017,EXPLORER 4X4 (U502) ,SPORT ,4 DOOR ,MPV ,1FMSK8GT9HG [REDACTED]	<b>Build Date:</b>	12/02/2016
<b>Odometer :</b>	3,076 M	<b>Engine:</b>	3.5L-GTDI
<b>Transmission:</b>	6F55	<b>Axle:</b>	<b>Calibration:</b> GUB1G10A
<b>Dealer:</b>	USA 01262 Sharpnack Ford, Inc.	<b>A/C:</b>	YES
<b>City:</b>	Willard	<b>State:</b>	Ohio
<b>Originator:</b>	Anthony Hershiser	<b>Country :</b>	USA
<b>Symptom:</b>	1 14 2 39 COMF/ENT,INTERIOR ODOR ,CHEMICAL,INTERMITTENT		
<b>Status:</b>			
<b>VFG:</b>	V74 HARD TRIM/SOFT TRIM/OVERHEAD S		
<b>Additional Symptom:</b>	FUEL ODOR IN VEHICLE		
<b>Fix:</b>	<b>Causal Component :</b>		
<b>Condition Code:</b>			
<b>Hotliner:</b>	LPERE111	<b>Phone:</b>	<b>Regn Cd:</b> G4 Pittsburgh
<b>Engineering:</b>		<b>Phone:</b>	<b>TAR:</b>
<b>Dlr Contact:</b>	Anthony Hershiser	<b>Phone:</b>	<b>Title Cde:</b> SW

**CONCER 05/03/2017 10:54AM LUIS PEREZ MSS - FCSD - TECH ASSIT CENTER**  
 Web Form Data (112005249) Description of Vehicle Concern: CS THAT AT HIGHWAY SPEEDS WITH THE SUNROOF IN THE OPEN POSITION THAT THERE IS A STRONG FUEL SMELL ENTERING THE VEHICLE, THE SMEEL IS BAD ENOUGH THAT THEY WERE GETTING HEADACHES Please list any diagnostics already performed: DIVE A RIDE ALONG WITH THE FIRE DEPARTMENT AND DETERMINED THAT THERE IS NO CO EMISSIONS ENTERING THE VEHICLE WITH THE SUN ROOF CLOSED AND DID NOT TEST WITH SUNROOF OPEN AS THERE WAS A CALL THEY HAD TO GO TO. Parts Replaced; NONE Your Question: WHAT IF ANY ACTION SHOULD BE TAKEN TO CORRECT THIS ISSUE. BY THE WAY THE VEHICLE DOES NOT HAVE A ROOF RACK, WEB-Ford-INT-bramm-May 03 2017 10:47:41:  
 Transferred from GAS to BODY

**RECOMM 05/03/2017 10:54AM LUIS PEREZ MSS - FCSD - TECH ASSIT CENTER**  
 Anthony, When you have a concern alleging a fire, accident, injury, property damage and/or burn has occurred due to an alleged product defect, 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](http://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 05/03/2017 10:54AM LUIS PEREZ MSS - FCSD - TECH ASSIT CENTER**  
 Article 1SM 1207003 REPORTED FIRE, ACCIDENT, INJURY, PROPERTY DAMAGE &/OR BURN HAS OCCURRED DUE TO AN ALLEGED PRODUCT DEFECT

**CONCER 05/18/2017 11:12AM**

We are requesting FSE involvement customer has ope case # [REDACTED]

**RECOMM** **05/19/2017 02:52PM BRIAN RIMEL MSS - FCSD - TECH ASSIT CENTER**  
Anthony, As previously mentioned, please submit a case to the Office Of General Counsel (OGC). This must be done due to the customer stating a Ford Motor Company product is causing the customer to have headaches and is a potential health hazard. Please update this form once OGC has cleared this vehicle at which point diagnostic direction can be provided. Use the directions previously recommended to submit a case. Thank you and have a great day.

**ADD-ON** **05/19/2017 02:52PM BRIAN RIMEL MSS - FCSD - TECH ASSIT CENTER**  
Consulted S.M.E Sid Raina to determine if another OGC response should be sent due to the technician not mentioning if the vehicle has been cleared.

**Requester:** ATAYLO29  
Report Summary  
**Server:** ECCVWS962


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22-May-2017  
**Retention:** None



**Service of Process  
Transmittal**

04/30/2018

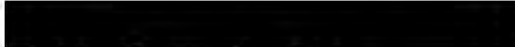
CT Log Number 

**TO:** Chris Dzbanski  
Ford Motor Company  
1 American Rd Whq 421-E6  
Dearborn, MI 48126-2701

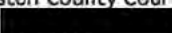
**RE:** **Process Served in South Carolina**


**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:**  Pltfs. vs. Ford Motor Company, Dft.

**DOCUMENT(S) SERVED:** Letter, Summons, Complaint

**COURT/AGENCY:** Charleston County Court of Common Pleas, SC  
Case # 

**NATURE OF ACTION:** Product Liability Litigation - Lemon Law - 2016 Ford 1FM5K7D85GG 

**ON WHOM PROCESS WAS SERVED:** CT Corporation System, Columbia, SC

**DATE AND HOUR OF SERVICE:** By Certified Mail on 04/30/2018 postmarked on 04/25/2018

**JURISDICTION SERVED :** South Carolina

**APPEARANCE OR ANSWER DUE:** Within 30 days after the service, exclusive of the day of such service

**ATTORNEY(S) / SENDER(S):** C. Steven Moskos  
C. Steven Moskos, P.A.  
4000 Faber Place Dr., Ste. 300  
North Charleston, SC 29405  
843-763-5297

**ACTION ITEMS:** CT has retained the current log, Retain Date: 05/01/2018, Expected Purge Date: 05/06/2018  
  
Image SOP  
  
Email Notification, Chris Dzbanski cdzbansk@ford.com  
  
Email Notification, Mary Ann MacKinnon mmackin1@ford.com

**SIGNED:** CT Corporation System  
**ADDRESS:** 2 Office Park Court  
Suite 103  
Columbia, SC 29223  
**TELEPHONE:** 804-217-7255

12 C. Steven Moksos  
C. Steven Moskos, P.A  
4000 Faber Place Dr., Ste. 300  
North Charleston SC 29405

**CERTIFIED MAIL™**



7012 3460 0000 0688 5567



CT Corporation System  
Registered Agent for Ford Motor Com  
2 Office Park Court, Suite 103  
Columbia SC 29223-5948



**\$6.880**  
US POSTAGE  
FIRST-CLASS  
FROM 29405  
04/25/2018  
stamps  
endicia



01285007496639

**C. STEVEN MOSKOS, P.A.**

Attorney and Counselor at Law

C. Steven Moskos  
Board Certified Civil Trial Attorney  
Board Certified Civil Pretrial Advocate  
By the National Board of Trial Advocacy  
Supreme Court of South Carolina Certified Mediator



4000 Faber Place Drive, Suite 300  
North Charleston, SC 29405  
Telephone: (843) 763-5297  
www.moskoslawfirm.com  
csmoskos@earthlink.net

April 25, 2018

**Certified Mail**  
**Return Receipt Requested**

CT Corporation System  
Registered Agent for Ford Motor Company  
2 Office Park Court, Suite 103  
Columbia, SC 29223

Re: [REDACTED] Ford Motor Company  
Case No. [REDACTED]

Dear Sir or Madam:

Please find enclosed and served upon you, CT Corporation System as Registered Agent for Ford Motor Company, a filed copy of the Summons and Complaint in regards to the above captioned matter.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
C. STEVEN MOSKOS

CSM/csb

Enclosures

cc: [REDACTED]

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

) IN THE COURT OF COMMON PLEAS  
) FOR THE NINTH JUDICIAL CIRCUIT  
) CASE NO. [REDACTED]

[REDACTED]

Plaintiffs,

vs.

FORD MOTOR COMPANY,

Defendant.

SUMMONS BY

FILED  
2018 APR 28 PM 4:36  
JULIE J. ARMSTRONG  
CLERK OF COURT

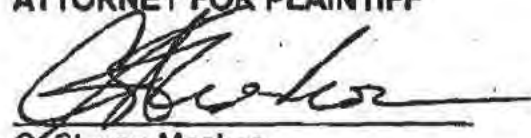
TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint upon the attorney for the Plaintiffs, [REDACTED] at his office located at 4000 Faber Place Drive, Suite 300, North Charleston, South Carolina 29405, within thirty (30) days of the service hereof, exclusive of the day of such service.

YOU ARE HEREBY GIVEN NOTICE FURTHER that, if you fail to appear and defend and fail to answer the Complaint as required by this Summons within thirty (30) days after the service hereof, judgment by default will be rendered against you for the relief demanded in the Complaint.

C. STEVEN MOSKOS, P.A.  
ATTORNEY FOR PLAINTIFF

BY:



C. Steven Moskos  
SC Bar No.: 7938  
400 Faber Place Dr., Suite 300  
North Charleston, SC 29405  
Telephone: (843) 763-5297  
Email: [csmoskos@earthlink.net](mailto:csmoskos@earthlink.net)

Charleston, South Carolina  
4/18, 2018

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

[REDACTED]

Plaintiffs,

vs.

FORD MOTOR COMPANY,

Defendant

2018-CP-10-2114  
IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO. 18-CP-10-  
FILED APR 23 PM 4:36  
JULIE J. ARMSTRONG  
CLERK OF COURT  
4/23/18  
BY \_\_\_\_\_

**COMPLAINT  
(JURY TRIAL DEMANDED)**

Plaintiffs, complaining of Defendant, allege the following:

1. That Plaintiff [REDACTED] is a resident of Charleston County, South Carolina.
2. That Plaintiff [REDACTED] is a resident of Charleston County, South Carolina.
3. That Defendant Ford Motor Company, hereinafter Ford, is a limited liability company organized and licensed in a State other than the State of South Carolina, and is doing business in the county of Charleston, South Carolina.
4. That on or about April 7, 2016, Plaintiffs purchased a 2016 Ford Explorer VIN: 1FM5K7D85GG [REDACTED] from Palmetto Ford, Inc. in Charleston County, South Carolina.
5. That Plaintiffs were purchasers, other than for purposes of resale, of the 2016 Ford Explorer VIN: 1FM5K7D85GG [REDACTED] a private passenger motor vehicle, which is a type normally used for personal, family, or household purposes.
6. That the 2016 Ford Explorer VIN: 1FM5K7D85GG [REDACTED] is subject to Ford's express warranty.
7. That Defendant Ford issued the warranty on the subject vehicle.
8. That Palmetto Ford is Ford's agent when Ford is required to make warranty repairs to the vehicles it manufactures and are sold through Palmetto Ford.
9. That Palmetto Ford is Ford's authorized dealer when Ford is required to make warranty

repairs to the vehicles it manufactures and are sold through Palmetto Ford.

10. Beginning shortly after Plaintiffs purchased this vehicle, and continuing to the present, the Plaintiffs have returned this vehicle to Ford, through its agent Palmetto Ford, on a number of occasions and complained that fumes, which Plaintiffs believe contain carbon monoxide and other poisonous gasses, are entering the cabin of the vehicle.
11. That Defendant Ford, through its agent and/or authorized dealer Palmetto Ford, has attempted repairs on the 2016 Ford Explorer.
12. That Defendant Ford has been allowed at least nine opportunities to repair the nonconformities in the Explorer.
13. That the Explorer has been out of service for at least 53 days.
14. That the fumes complained of continue to enter the cabin as Defendant Ford has not repaired the vehicle.
15. That nine opportunities and 53 days is a reasonable opportunity for Defendant Ford to repair the subject vehicle.
16. That Defendant Ford, through its agent and/or authorized dealer Palmetto Ford, has failed to conform the vehicle to its warranty in that fumes, which Plaintiffs believe contain carbon monoxide and other poisonous gasses, are still entering the cabin of the vehicle.
17. That fumes containing carbon monoxide and other poisonous gasses which enter the cabin of the vehicle create an unsafe condition for the occupants of the vehicle.
18. That a Ford Explorer which allows fumes containing carbon monoxide and other poisonous gasses to enter the cabin of the vehicle is defective in parts and/or workmanship.
19. That a Ford Explorer which allows fumes containing carbon monoxide and other poisonous gasses to enter the cabin of the vehicle does not conform to Ford's warranty.
20. That the Ford Explorer's nonconformity of allowing fumes containing carbon monoxide

and other poisonous gasses into the cabin of the vehicle during normal driving is a defect or condition that substantially impairs the use, value, or safety of that vehicle.

21. That Defendant Ford recognizes that the vehicle is nonconforming.
22. That Defendant Ford has admitted to the Better Business Bureau, as part of the Parties involvement in Ford's informal dispute settlement program, that Mr. and Mrs. [REDACTED] Explorer is nonconforming to the extent that fumes containing carbon monoxide and other poisonous gasses are coming into the cabin of Mr. and Mrs. [REDACTED] Explorer.
23. That Defendant Ford has acknowledged that the vehicle is nonconforming.
24. That Defendant Ford has acknowledged that it should repurchase the subject vehicle.
25. That the fumes coming into the cabin of the vehicle are not a result of an accident, modification, or alteration of the motor vehicle by persons other than the manufacturer or its authorized service agent.
26. That Ford does not have any evidence that the fumes coming into the cabin of the vehicle are a result of an accident, modification, or alteration of the motor vehicle by persons other than the manufacturer or its authorized service agent.
27. That Plaintiffs have made a demand on Defendant to accept the return of the subject vehicle pursuant to South Carolina law.
28. That Defendant has failed and refused to accept the return of the subject vehicle in a timely fashion.
29. That Plaintiffs have had to purchase alternate transportation as a result of the defects and conditions in the subject vehicle.
30. That Plaintiffs have had to hire an attorney to represent them in this matter.

**FOR A FIRST CAUSE OF ACTION**  
**(BREACH OF WARRANTIES)**

31. That Plaintiffs repeat all prior paragraphs as if repeated herein verbatim.

32. Defendant Ford expressly warranted to Plaintiffs that it would repair defects in parts and/or workmanship in Plaintiffs' vehicle.
33. Although Defendant Ford has attempted to limit Plaintiffs' rights under the warranty to the replacement or repair of defects in parts and/or workmanship under the terms of the express warranty, this exclusive remedy has failed to serve its essential purpose, in that Defendant Ford has failed to correct Plaintiffs' vehicle defects after attempting numerous times to do so.
34. Defendant Ford impliedly warranted that Plaintiffs' vehicle would pass without objection in the trade, that it was of fair average quality for goods of that type, and that it was suitable to be used for the ordinary purposes for which these vehicles are used.
35. Defendant Ford breached all implied and express warranties to Plaintiffs, and as a direct and proximate result of Defendant Ford's breaches, Plaintiffs have suffered actual, consequential and incidental damages.

**FOR A SECOND CAUSE OF ACTION**  
**(VIOLATION OF MAGNUSON-MOSS WARRANTY ACT)**

36. That Plaintiffs repeat all prior paragraphs as if repeated herein verbatim.
37. Upon information and belief, Defendant Ford is a supplier of consumer products engaged in the business of making vehicles directly or indirectly available to consumers.
38. Defendant Ford failed to comply with its warranty obligations to Plaintiffs under its written and/or implied warranties in the following particulars:
  - a. In failing to provide Plaintiffs with a vehicle which was free from defects;
  - b. In failing to provide Plaintiffs with a vehicle which would pass without objection in the trade;
  - c. In failing to provide Plaintiffs with a vehicle of fair average quality for goods of that type;

- d. In failing to provide Plaintiffs with a vehicle which was fit for the ordinary purposes for which such vehicles are used; and
  - e. In failing to properly repair, replace or adjust defects in the vehicle's parts and/or workmanship.
39. That Plaintiffs have afforded Defendant Ford a reasonable opportunity to cure its failure to comply with its warranty obligations, but Defendant Ford has failed and/or refused to do so.
40. That Plaintiffs have returned the subject vehicle to Defendant and demanded a refund of their money, however, Defendant has failed and refused to refund Plaintiffs' money.
41. The Plaintiffs continue to stand ready to return the subject vehicle in exchange for a refund of their money.
42. The Plaintiffs are, therefore, informed and believe that they have complied with the requirements of 15 U.S.C. 2301 et seq. to the best of their ability.
43. As a direct and proximate result of the acts above, Defendant Ford, upon information and belief, has violated 15 U.S.C. 2301 et seq., commonly known as the Magnuson-Moss Warranty Act, and as a direct and proximate result of Defendant's violation, Plaintiffs have suffered actual, consequential and incidental damages, and they have incurred attorney's fees and costs in bringing this action.

**FOR A THIRD CAUSE OF ACTION**  
**(ENFORCEMENT OF MOTOR VEHICLE EXPRESS WARRANTIES)**

44. That Plaintiffs repeat all prior paragraphs as if repeated herein verbatim.
45. That Plaintiffs notified Defendant Ford, individually and through its agent, Palmetto Ford, that the motor vehicle had not been conformed to Defendant's express warranties.
46. That neither Defendant Ford, nor its authorized dealers, have been able to conform the motor vehicle to the express warranties which apply to the aforementioned vehicle.

47. That the defects and condition of the vehicle substantially impair its use, market value and/or safety to Plaintiffs.
48. That Defendant has been allowed a reasonable number of attempts to fix the vehicle but it is still unable to conform the vehicle to the applicable express warranties.
49. That Plaintiffs are entitled to a refund of their money and the satisfaction of any debt owed to a financial institution.
50. That Defendant has failed and refused to repurchase or replace the vehicle pursuant to Section 56-28-10 et. seq. of the South Carolina Code of Laws, 1976 as amended.
51. That Plaintiffs are, therefore, informed and believe that they have complied with the requirements of Section 56-28-10 et. seq. of the South Carolina Code of Laws 1976 as amended.
52. That as a direct and proximate result of the acts alleged above, Defendant, upon information and belief, has violated Section 56-28-10 et. seq. of the South Carolina Code of Laws 1976, as amended, commonly known as the Enforcement of Motor Vehicle Express Warranties Act, and should be required to repurchase the subject vehicle and compensate Plaintiffs for their actual, consequential and incidental damages, finance charges, sales taxes, license fees, registration fees and other similar governmental charges, and pay Plaintiffs' attorney's fees and costs incurred in bringing this action.

**FOR A FOURTH CAUSE OF ACTION**  
**(UTPA VIOLATION)**

53. That Plaintiffs repeat all prior paragraphs as if repeated herein verbatim.
54. That the aforementioned acts and practices of Defendant in placing the subject car in the stream of commerce, in failing and refusing to repurchase or replace the vehicle under the South Carolina Lemon Law, and in failing and refusing to repurchase the vehicle pursuant to the Uniform Commercial Code are unfair and deceptive.

55. That the aforementioned acts and practices of Defendant are against public interest and that these acts and practices are capable of repetition.
56. That Defendant's actions were willful and wanton in that Defendant knew or should have known that its conduct was unfair and deceptive and, therefore, a violation of this State's statutes concerning unfair and deceptive acts and practices.
57. That as a result of Defendant's unfair and deceptive acts or practices in violation of this State's statutes, Plaintiffs pray judgment against Defendant for three times the actual damages, together with attorney's fees, together with the costs and disbursements of this action.

**FOR A FIFTH CAUSE OF ACTION**  
**(REGULATION OF MOTOR VEHICLE DEALERS ACT)**

58. That Plaintiffs repeat all prior paragraphs as if repeated herein verbatim.
59. That Plaintiffs are informed and believe that the malicious and deceptive acts and practices of the Defendant constitute a violation of Section 56-15-10 et. seq. of the South Carolina Code of Laws 1976.
60. That as a result of Defendant's deceptive acts and practices, Plaintiffs have suffered damages in the loss of the value of the vehicle.
61. That as a result of Defendant's violation of this State's Statutes dealing with the regulation of manufacturers, Plaintiffs demands (2) two times their actual damages, together with punitive damages not to exceed three times the actual damages, together with attorney fees, together with the costs and disbursements of this action.

**FOR A SIXTH CAUSE OF ACTION**  
**(Fraud)**

62. That Plaintiffs repeat all previous paragraphs as if repeated herein verbatim.
63. That Ford and its dealer, agents, and/or employees failed to disclose to Plaintiffs material facts regarding the vehicle's known defects that allow poisonous gasses into the cabin

of Ford Explorers.

64. That Defendant and its dealer, agents, and/or employees made false representations of material fact to Plaintiffs:
65. That Defendant and its dealer, agents, and/or employees knew or should have known that the representations which were made to Plaintiffs were false.
66. That Ford intended that Plaintiffs rely upon its misrepresentations of material fact concerning the condition of the vehicle.
67. That Ford's failure to disclose to and its affirmative misrepresentations to Plaintiffs about the condition of the vehicle constitutes fraudulent concealment or nondisclosure of material facts regarding the transaction.
68. That Plaintiffs were unaware of the falsity of the representations at the time the representations were made.
69. That Plaintiffs were unable to discover the falsity of the representations made by Defendant and their agents and/or employees.
70. That Plaintiffs had a right to rely and did rely upon the representations made by Defendant and its dealer, agents, and/or employees.
71. That Defendant had an obligation to inform Plaintiffs truthfully about Defendant's inability to fix the problems with the Ford Explorer model vehicle that allow carbon monoxide and other poisonous gasses into the vehicle.
72. That Defendant was in a superior position to Plaintiffs to know Defendant's vehicles are dangerous in that they allow carbon monoxide and other poisonous gasses into the vehicle.
73. That Defendant failed to fulfill its obligations to Plaintiffs.
74. That as a result of Defendant's fraud, Plaintiffs have been damaged in that they have purchased a dangerous vehicle, they have lost the use of a vehicle, they have had to find

alternate transportation, and they have been embarrassed and humiliated.

75. That as a result of Defendants' fraud, Plaintiffs demand their actual damages, together with punitive damages, together with prejudgment interest, together with the costs and disbursements of this action.

WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

1. In the First Cause of Action for actual, consequential and incidental damages for Defendant's breaches of express and implied warranties;
2. In the Second Cause of Action for a refund of their money, actual, consequential, and incidental damages, together with reasonable attorney's fees and costs for Defendant's violation of 15 U.S.C. 2301 *et seq.*;
3. In the Third Cause of Action for a refund of their money, actual, consequential and incidental damages, together with reasonable attorney's fees and costs for Defendant's violation of Section 56-28-10 *et seq.*, S.C. Code Ann.;
4. In the Fourth Cause of Action for three (3) times their actual damages, together with attorney's fees, together with the costs and disbursements of this action.
5. In the Fifth Cause of Action for two (2) times their actual damages, together with punitive damages not to exceed three (3) times the actual damages, together with attorney fees, together with the costs and disbursements of this action.
6. In the Sixth Cause of Action for actual damages, together with punitive damages, together with prejudgment interest, together with the costs and disbursements of this action.
7. For such other and further relief as this Court deems just and proper.

**C. STEVEN MOSKOS, P.A.  
ATTORNEY FOR PLAINTIFFS**

BY: 

C. Steven Moskos  
SC Bar# 7938  
4000 Faber Place Dr., Ste. 300  
North Charleston, SC 29405  
Telephone: (843) 763-5297  
Email: csmoskos@earthlink.net

Charleston, South Carolina  
4/18, 2018

# VILLAGE FIRE DEPARTMENT

Email Subject: Dealer/Fleet Request for OGC Review

**DEALER INFORMATION:**

Dealership Fleet Name: Ford of Ocala, Inc.

Requesting Dealer Fleet: ford of ocala

PA Code: 02865

Contact Person: reginald horton

Title: service director/village

Phone Number: 352-233-2900

Fax Number: 352-233-2951

Email: rjhorton@dagmail.com

Region: orlando

Address: 11660 sound hwy 441

City: belleview

State: Florida

Zip Code: 34420

**CUSTOMER VEHICLE INFORMATION:**

Warranty Start Date: 4/21/2015

Vehicle Year: 2015

Vehicle Model: explorer

Vehicle VIN: 1FMSK [REDACTED]

Mileage: [REDACTED]

[REDACTED]

Street Address: [REDACTED]

City : the villages

State : Florida

Zip Code : [REDACTED]

Home Phone: [REDACTED]

Work Phone: [REDACTED]

Customer Region: orlando

**DETAILS OF INCIDENT:**

Medical Attention Sought

Date of Incident: 2017-05-18

County incident occurred: sumter

Is customer alleging a component defect CAUSED the incident? YES

Details: exhaust fumes in vehicle tested blood of driver showed high level carbon monoxide

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: village ford

Attorney information:

CVO Contact:

Resolution Customer is seeking: vehicle fixed so no fumes in vehicle have done tsb and followed hotline .





**Service of Process  
Transmittal**

05/22/2017

CT Log Number [REDACTED]

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

**RE:** Process Served in Texas

**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:** [REDACTED] vs. Ford Motor Company, Dft.

**DOCUMENT(S) SERVED:** Citation, Attachment(s), Original Petition and Request

**COURT/AGENCY:** 352nd Judicial District Court Tarrant County, TX  
Case # [REDACTED]

**NATURE OF ACTION:** Product Liability Litigation - Breach of Warranty - 2015 Ford Explorer, VIN: 1FM5K7F82FG [REDACTED]

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Dallas, TX.

**DATE AND HOUR OF SERVICE:** By Certified Mail on 05/22/2017 postmarked: "Not Post Marked"

**JURISDICTION SERVED :** Texas

**APPEARANCE OR ANSWER DUE:** At or before 10:00 a.m. on the Monday next after the expiration of 20 days after the date of service

**ATTORNEY(S) / SENDER(S):** Craig M. Patrick  
Patrick Law Firm, P.C.  
6244 E. Lovers Lane  
Dallas, TX 75214  
214-390-3343

**ACTION ITEMS:** CT has retained the current log, Retain Date: 05/23/2017, Expected Purge Date: 05/28/2017  
Image SOP  
Email Notification, Chris Dzbanski cdzbansk@ford.com  
Email Notification, Mary Ann MacKinnon mmackin1@ford.com

**SIGNED:** C T Corporation System  
**ADDRESS:** 1999 Bryan Street  
Suite 900  
Dallas, TX 75201  
**TELEPHONE:** 214-932-3601

1710782

Ford Motor Company  
CT Corporation System  
1999 Bryan St, Ste. 900  
Dallas, TX 75201



6244  
Dallas, TX 75214



7025 1660 0000 6131 9046



THE STATE OF TEXAS  
DISTRICT COURT, TARRANT COUNTY

CITATION

Cause



VS.  
FORD MOTOR COMPANY

TO: FORD MOTOR COMPANY

B/S CT CORPORATION SYSTEM-REG AGT 1599 BRYAN ST STE 900 DALLAS, TX 75201-

You said DEFENDANT are hereby commanded to appear by filing a written answer to the PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE at or before 10 o'clock A.M. of the Monday next after the expiration of 20 days after the date of service hereof before the 352nd District Court, 100 N CALHOUN, in and for Tarrant County, Texas, at the Courthouse in the City of Fort Worth, Tarrant County, Texas said PLAINTIFF being



Filed in said Court on May 16th, 2017 Against  
FORD MOTOR COMPANY

For suit, said suit being numbered [redacted] the nature of which demand is as shown on said PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE a copy of which accompanies this citation.

CRAIG M PATRICK

Attorney for [redacted]  
Address 6244 E LOVERS LN DALLAS, TX 75214

Thomas A. Wilder, Clerk of the District Court of Tarrant County, Texas. Given under my hand and the seal of said Court, at office in the City of Fort Worth, this the 16th day of May, 2017.

By *Anthony Ferrara*  
ANTHONY FERRARA



A CERTIFIED COPY  
ATTEST: 05/16/2017  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
By: /s/ Anthony Ferrara

NOTICE: You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 AM. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Thomas A. Wilder, Tarrant County District Clerk, 100 N CALHOUN, FORT WORTH TX 76196-0402

OFFICER'S RETURN \*35229212017000005\*

Received this Citation on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M; and executed at \_\_\_\_\_ within the county of \_\_\_\_\_, State of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ by delivering to the within named (Def.): \_\_\_\_\_ defendant(s), a true copy of this Citation together with the accompanying copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE, having first endorsed on same the date of delivery.

Authorized Person/Constable/Sheriff: \_\_\_\_\_  
County of \_\_\_\_\_ State of \_\_\_\_\_ By \_\_\_\_\_ Deputy  
Fees \$ \_\_\_\_\_  
State of \_\_\_\_\_ County of \_\_\_\_\_ (Must be verified if served outside the State of Texas)  
Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_  
to certify which witness my hand and seal of office  
(Seal)  
County of \_\_\_\_\_, State of \_\_\_\_\_

*CITATION*

Cause No. [REDACTED]

VS.

FORD MOTOR COMPANY

ISSUED

This 16th day of May, 2017

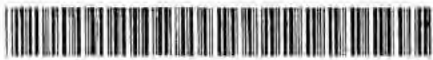
Thomas A. Wilder  
Tarrant County District Clerk  
100 N CALHOUN  
FORT WORTH TX 76196-0402

By ANTHONY FERRARA Deputy

CRAIG M PATRICK  
Attorney for: ALDO ELIAS  
Phone No. (214)390-3343  
ADDRESS: 6244 E LOVERS LN

DALLAS, TX 75214

*CIVIL LAW*



\*35229212017000005\*  
SERVICE FEES NOT COLLECTED  
BY TARRANT COUNTY DISTRICT CLERK  
ORIGINAL



A-GOSTHERS.COM  
ATTORNEY REPORT  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: ANTHONY FERRARA

FILED  
TARRANT COUNTY  
5/16/2017 10:57:29 AM  
THOMAS A. WILDER  
DISTRICT CLERK

CAUSE NUMBER: [REDACTED]

[REDACTED]  
IN THE DISTRICT COURT

v.

\_\_\_\_ JUDICIAL DISTRICT

FORD MOTOR COMPANY

TARRANT COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE**

**TO THE HONORABLE JUDGE OF SAID COURT:**

[REDACTED] Plaintiff, complains of **FORD MOTOR COMPANY**, Defendant, and files this his Original Petition.

**DISCOVERY CONTROL PLAN**

1. Pursuant to the Texas Rules of Civil Procedure, Plaintiff gives notice that he intends to pursue a discovery control plan pursuant to Rule 190.2 (Level 1).

**AMOUNT IN CONTROVERSY**

2. Pursuant to Texas Rules of Civil Procedure 47(c), Plaintiff states that he seeks less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.

**PARTIES**

3. Plaintiff resides in Keller, Texas.

4. Defendant **FORD MOTOR COMPANY** is a corporation authorized to conduct business in the State of Texas and may be served through its registered agent, C T Corporation System, at 1999 Bryan St., Suite 900, Dallas, Texas 75201.

**VENUE AND JURISDICTION**

5. Venue is proper in Tarrant County, Texas because Plaintiff resided in Tarrant County at the time the cause of action for breach of warranty accrued.

6. Jurisdiction is proper as the amount prayed for is within the jurisdictional limits of this Honorable Court.

**STATEMENT OF FACTS**

7. On May 9, 2015, Plaintiff purchased a 2015 Ford Explorer, VIN:1FM5K7F82FGC [REDACTED] (the Vehicle) from Five Star Ford in North Richland Hills, Texas for approximately \$45,300.

8. Plaintiff has had numerous problems with the Vehicle. Since purchase, the Vehicle has encountered an excessive number of defects, including but not limited to exhaust leaking into the cabin, clicking noise from the front seat, and the front end. The Vehicle has been in the shop at least 4 times and spent approximately 25 days in the shop. The Vehicle still has problems with exhaust leaks despite numerous repair attempts.

**CAUSES OF ACTION**

**Texas Deceptive Trade Practices-Consumer Protection Act ("DTPA")**

9. Plaintiff is a "consumer" as defined in the DTPA.

10. Defendant violated the following provisions of the DTPA:

(1) §17.50(1): the use or employment of a false, misleading, or deceptive acts or practices as defined in §17.46(b)(5), §17.46(b)(7), §17.46(b)(12), §17.46(b)(20), and §17.46(b)(24) of the DTPA that were detrimentally relied upon by Plaintiff;

(2) §17.50(2): breach of express warranty, as defined in §2.313 of the Tex Bus and Com Code;

(3) §17.50(2): breach of the implied warranty to perform repairs in a good and workmanlike manner, as set forth in *Melody Home Mfg. Co. v. Barnes*, 741 S.W.2d 349, 354 (Tex. 1987);

(4) §17.50(2): breach of the implied warranty of merchantability as defined in §2.314 of the Texas Business and Commerce Code;

(5) §17.50(3): an unconscionable action or course of action as defined by §17.45(5).

11. The limited remedies in the manufacturer's warranties failed of its essential purpose and deprived Plaintiff of the substantial value of the bargain because Defendant did not correct the defects within a reasonable time. TEX. BUS. AND COM. CODE § 2.719. Additionally, the exclusion of consequential damages is unconscionable.

12. Plaintiff further contends that Defendant's violations of the DTPA were committed knowingly and intentionally as those terms are defined in §17.45(9) and §17.45(13) of the DTPA.

13. This conduct was a producing and/or proximate cause of actual damages to Plaintiff, as set forth below.

#### DAMAGES

14. As a result of Defendant's conduct, Plaintiff has suffered actual damages, including direct, consequential and incidental damages in an amount within the jurisdictional limits of this Court. Such damages include, but are not limited to:

- (1) diminished value of the vehicle (the difference at the time and place of acceptance between the value of the vehicle as accepted and the value it would have had if it had been as warranted or represented);
- (2) loss of use;
- (3) cost of repair;
- (4) out of pocket expenses.

15. Because the conduct of Defendant was done knowingly and intentionally, Plaintiff is entitled to additional damages for a knowing and/or intentional violation of the DTPA pursuant to §17.50(b)(1), in an appropriate amount to be determined by the jury.

**ATTORNEY'S FEES**

16. Plaintiff seeks all reasonable and necessary attorneys' fees in this case, which include the following:

- a. preparation and trial of this lawsuit;
- b. post-trial, pre-appeal legal services;
- c. an appeal to the Court of Appeals;
- d. making or responding to an application for writ of error to the Supreme Court of Texas;
- e. an appeal to the Supreme Court of Texas in the event application for writ of error is granted; and
- f. post-judgment discovery and collection in the event execution on the judgment is necessary.

**CONDITIONS PRECEDENT**

17. All notices and other conditions precedent to Plaintiff's right to recover herein have been performed or have occurred.

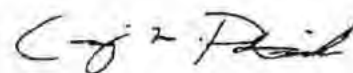
**REQUEST FOR DISCLOSURE**

18. Pursuant to Texas Rule of Civil Procedure 194, Defendant is requested to disclose the information or material described in Rule 194.2.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff respectfully prays that Defendant be cited to appear and answer herein, and that upon final trial, he recover his actual damages, additional statutory damages, exemplary damages, attorney's fees, costs of court, pre-judgment and post-judgment interest at the highest legal rates, and such other and further relief, both general and special, at law or in equity, to which he may be justly entitled.

**RESPECTFULLY SUBMITTED:**

PATRICK LAW FIRM, P.C.



By: \_\_\_\_\_

Craig M. Patrick  
State Bar No. 00792743

6244 E. Lovers Lane  
Dallas, Texas 75214  
Phone: (214) 390-3343  
Fax: (469) 914-6565  
craig@patricklaw.com

**ATTORNEY FOR PLAINTIFF**





\*\*\*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](mailto: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 \*\*\*

PRIVILEGED AND CONFIDENTIAL

This email contains privileged and confidential communications

If you received it in error, please delete it immediately and notify the sender.

**From:** DCPFORM, FMCDdealer (-)  
**Sent:** Tuesday, May 23, 2017 11:18 AM  
**To:** Ordcalp, F (F.); Taylor, Alma (A.)  
**Cc:** franksmith@bajeri.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:** Baierl Ford  
**Requesting Dealer Fleet:** Baierl Ford  
**PA Code:** 01486  
**Contact Person:** Frank Smith  
**Title:** Service Manager  
**Phone Number:** 7246091515  
**Fax Number:**  
**Email:** [franksmith@baierl.com](mailto:franksmith@baierl.com)  
**Region:** Pittsburgh  
**Address:** 540 South Main Street  
**City:** Zelienople  
**State:** Pennsylvania  
**Zip Code:** 16063

**CUSTOMER VEHICLE INFORMATION:**

**Warranty Start Date:** 10/31/2012  
**Vehicle Year:** 2013  
**Vehicle Model:** Explorer  
**Vehicle VIN:** 1FM5K8D84DG [REDACTED]  
**Mileage:** 54783  
**customer Fleet Name:** [REDACTED]  
**Street Address:** [REDACTED]  
**City :** Cranberry Twp  
**State :** Pennsylvania  
**Zip Code :** [REDACTED]  
**Home Phone:** [REDACTED]  
**Work Phone:** [REDACTED]

**Customer Region:** Pittsburgh

**DETAILS OF INCIDENT:**

**Medical Attention Sought:**

**Date of Incident:** 2017-05-18

**County incident occurred:** Butler

Is customer alleging a component defect CAUSED the incident? YES

**Details:** Customer is stating exhaust fumes are making her children vomit and has been to doctors.

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:** Customer has possession of vehicle

**Attorney information:**

**CVO Contact:**

**Resolution Customer is seeking:** Customer does not want vehicle and stated they want it bought back.

**Comments:** We performed Fords TSB and we can not verify exhaust fumes and also used a CO detector during a roadtest with no detection. Customer is still claiming they can smell exhaust fumes after repairs performed. We have been in contact with Ford Technical Hotline, Report number 111982126 Customer notified us about the doctors visit on 5/18/2017 and never mentioned it during the previous service visits. Customer states children were at the doctors sometime last month.

ROBERT A. SILVERMAN  
CHAD THOS KIMMEL

\* Member, PA Bar  
\* Member, NJ Bar  
\* Member, DE Bar  
\* Member, NY Bar  
\* Member, MD Bar  
\* Member, VA Bar  
\* Member, OH Bar  
\* Member, IN Bar  
\* Member, CT Bar  
\* Member, TN Bar  
\* Member, KY Bar  
\* Member, DC Bar  
\* Member, CA Bar  
\* Member, UT Bar



**KIMMEL & SILVERMAN**  
P.C.

1-800-LEMON LAW  
[www.lemonlaw.com](http://www.lemonlaw.com)

CORPORATE HEADQUARTERS  
30 E. Butler Pike  
Ambler, PA 19002  
P (215) 340-8881  
F (215) 540-8817

WESTERN PA OFFICE, 100 Ross Street, Suite 300, Pittsburgh, PA 15219, P (412) 566-1001, F (412) 566-1008

NEW JERSEY OFFICE, Executive Quarters, 1910 E. Markon Pike, Suite Q29, Cherry Hill, NJ 08003, P (856) 429-8334, F (856) 216-7344

DELAWARE OFFICE, 501 Silverside Road, Suite 118, Wilmington, DE 19809, P (302) 791-1373, F (302) 791-9476

CONNECTICUT OFFICE, 115 Main Street, Suite 301, Elmington, CT 06219, P (860) 866-4380, F (860) 263-0919

NEW YORK OFFICE, 1001 Avenue of the Americas, 11th Floor, New York, NY 10018, P (212) 719-7543, F (877) 611-2515

BUFFALO, NY OFFICE, 1257 Delaware Avenue, Suite 440, Buffalo, NY 14201, P (716) 332-6112, F (800) 863-1486

PLEASE REMIT ALL CORRESPONDENCE TO THE WESTERN PA OFFICE

June 26, 2017

Ford Motor Company  
c/o CT Corporation System  
116 Pine Street  
Suite 320  
Harrisburg, PA 17101

Re: [REDACTED] Ford Motor Company  
Allegheny County Docket No. [REDACTED]

Dear Sir or Madam:

Enclosed please find a copy of the above-referenced *Complaint* that has been filed against Ford Motor Company in the Court of Common Pleas, Allegheny County, Pennsylvania. You are being served pursuant to the Pennsylvania Rules of Civil Procedure, Rule 403.

Please submit the enclosed to your legal department. A responsive pleading is due 20 days after the receipt of this complaint.

Very truly yours,

Robert A. Rapkin  
KIMMEL & SILVERMAN, P.C.

RAR/CAC  
Enclosures

ANGELIQUE C. HENRY  
ROBERT A. RAPKIN  
SUSAN K. TRICOT  
AMY L. BENDEROFF GALESSIO  
S. CHRISTOPHER CORPUSCO  
JASON L. GREGG  
SHANNON S. HARRISS  
CRAD F. EDMAN  
STACY FITZGERALD  
RACHEL M. HALL  
RACHEL M. HENDERSON  
JOSEPH C. HOFFEL  
NICHOLE J. ALLEN

**Chelsea A.C. Crawford**

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**From:** Lisa Triantafilou  
**Sent:** Wednesday, June 07, 2017 11:38 AM  
**To:** Chelsea A.C. Crawford  
**Subject:** FW: Allegheny County Court of Common Pleas Event Notification: [REDACTED]

-----Original Message-----

**From:** webmaster.pro@county.allegheny.pa.us [mailto:webmaster.pro@county.allegheny.pa.us]  
**Posted At:** Wednesday, June 07, 2017 11:37 AM **Posted To:** Allegheny E-File  
**Conversation:** Allegheny County Court of Common Pleas Event Notification: [REDACTED]  
**Subject:** Allegheny County Court of Common Pleas Event Notification: [REDACTED]

An Arbitration Hearing has been scheduled for  
Case Number [REDACTED] Egnacheski etal vs Ford Motor Company  
at Room 702, City-County Building on 10/04/2017 at 09:00:00.

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, forwarding, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
DEPARTMENT OF COURT RECORDS CIVIL/FAMILY DIVISION  
ARBITRATION DOCKET



PLAINTIFFS

\_\_\_\_\_ VS. \_\_\_\_\_

DEFENDANT

ARBITRATION DOCKET

NO. \_\_\_\_\_

HEARING DATE: \_\_\_\_\_

Court Room 2  
City-County Building  
7th Floor  
9:00 A.M.

**NOTICE TO DEFEND**

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) days after this complaint and notice are served by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money, property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. If you do not have a lawyer, go to or telephone the office set forth below. This office can provide you with information about hiring a lawyer. IF YOU CANNOT AFFORD TO HIRE A LAWYER, this office may be able to provide you with information about agencies that may offer legal service to eligible persons at a reduced fee or no fee.

**LAWYER REFERRAL SERVICE,**  
The Allegheny County Bar Association  
11th Floor Koppers Bldg.  
436 Seventh Ave, Pittsburgh, PA 15219  
TELEPHONE 412-261-5555


**HEARING NOTICE**

YOU HAVE BEEN SUED IN COURT. The above Notice to Defend explains what you must do to dispute the claims made against you. If you file the written response referred to in the "Notice to Defend" a hearing before a Board of Arbitrators will take place in Court Room 2, 7th floor of the City County Building, 414 Grant Street, Pittsburgh, Pennsylvania on \_\_\_\_\_, 20\_\_\_\_, at 9:00 a.m. IF YOU FAIL TO FILE the response described in the "Notice to Defend" a judgment for the amount claimed in the complaint may be entered against you before the hearing.

**DUTY TO APPEAR AT ARBITRATION HEARING**

If one or more of the parties is not present at the hearing, THE MATTER MAY BE HEARD AT THE SAME TIME AND DATE BEFORE A JUDGE OF THE COURT WITHOUT THE ABSENT PARTY OR PARTIES. THERE IS NO RIGHT TO A TRIAL DE NOVO ON APPEAL FROM A DECISION ENTERED BY A JUDGE.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

 CIVIL DIVISION

Plaintiffs,

vs.

NO.:

FORD MOTOR COMPANY,

Defendant.

COMPLAINT IN CIVIL ACTION

Filed on behalf of Plaintiffs:  
Stephanie Jill Egnacheski and  
Michael John Egnacheski

COUNSEL OF RECORD FOR THIS PARTY:

Robert A. Rapkin, Esquire  
Identification No. 61628

**KIMMEL & SILVERMAN, P.C.**  
30 East Butler Pike  
Ambler, PA 19002  
(215) 540-8888

WRIT WAIVED