

September 12, 2017

Ford Motor Company
40600 ANN ARBOR RD E STE 201
PLYMOUTH MI 48170
Re: Demand for Payment

FORD MOTOR COMPANY
RECEIVED
SEP 15 2017
OFFICE OF THE
GENERAL COUNSEL

Dear Ford Motor Company,

Please be advised that Ford Motor Company owes me the sum of 2120.21 because of the faulty Electric Steering Rack that Ford knowingly has allowed to remain in my vehicle despite acknowledging its risk of failure while driving possibly causing serious injury or death due to sudden failure while under operation. Ford acknowledges the part is defective due to recall 15S18 that was issued but does not cover the year 2010 to which I own. To allow this part to remain in earlier models with no notice or offer of replacement is gross negligence. I suffered a minor crash due to the above part failure, had I been at highway speed the outcome may have been drastically different. My vehicle would apply to all terms of the current recall other than its date of manufacture.

This will be Ford Motor Company's only chance to settle this matter before I file suit against Ford Motor Company in Small Claims Court. I am agreeable to a lump sum payment of 2120.21 to consider this matter resolved. Please contact me on or before September 27, 2017 for purposes of settling this matter. If I do not hear from Ford Motor Company on or before September 27, 2017, I will file a lawsuit against Ford Motor Company without further notice. It is in Ford Motor Company's best interest to settle this matter before a lawsuit is filed.

Based on the foregoing, I expect payment in the amount of 2120.21 made payable to [REDACTED] [REDACTED] no later than September 27, 2017. (I can be reached at the address below.) If Ford Motor Company decides to ignore this demand for payment, I will further pursue all legal remedies without further notice to Ford Motor Company. This letter serves as evidence that I have attempted to resolve this matter informally.

Please find attached paperwork to support my request.

[REDACTED]



LINCOLN

OURISMAN

6129 RICHMOND HWY.
ALEXANDRIA, VA 22303
SERVICE DIRECT: 703-660-0450 MAIN: 703-660-9000



STEERING FAULT WARNING ON DISPLAY
PERFORMED PSCH DIAGNOSIS. INTERNAL FAULT, RECOMMEND REPLACING ELECTRIC POWER STEERING RACK AND ALIGNMENT

TS	QTY	FP NUMBER	DESCRIPTION	UNIT PRICE	WARRANTY
			JOB # 1 TOTAL PARTS	0.00	
			JOB # 1 TOTAL LABOR & PARTS	135.00	

DRIVEABILITY RECALL (3ANTHONYR @ 06/05/2017 13:44)
RECALL 15534
COMPLETED RECALL 15534

TS	QTY	FP NUMBER	DESCRIPTION	UNIT PRICE	WARRANTY
# 2	1	9U5Z-9C915-H	VALVE A 436195	0.00	
			JOB # 2 TOTAL PARTS	0.00	
			JOB # 2 TOTAL LABOR & PARTS	0.00	

REPAIRS RECOMMENDED

TS	QTY	FP NUMBER	DESCRIPTION	UNIT PRICE	WARRANTY
			JOB # 3 TOTAL PARTS	0.00	
			JOB # 3 TOTAL LABOR & PARTS	0.00	

RECOMMENDATIONS:
PLACE ELECTRIC POWER STEERING RACK AND ALIGNMENT - \$222
TAX. WOULD TAKE 1 FULL DAY TO REPAIR

LINCOLN

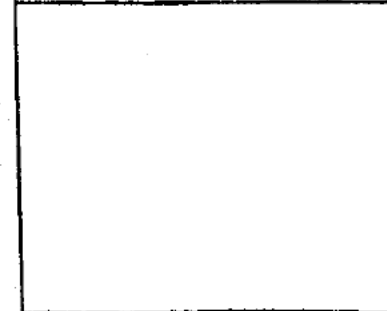
ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW:

X

P&A CODE
00141-7

WARRANTY ONLY
On behalf of servicing dealer, I hereby certify that the information contained hereon is accurate. Unless otherwise shown, services described were performed at no charge to owner. There was no indication from the appearance of the vehicle or otherwise that any part repaired or replaced under this claim had been connected in any way with any accident, negligence or misuse. Records supporting this claim are available for (1) year from the date of payment notification at the servicing dealer for inspection by representatives to Ford.

MONDAY - FRIDAY
7:00 AM to 7:00 PM
SATURDAY
8:00 AM to 4:00 PM



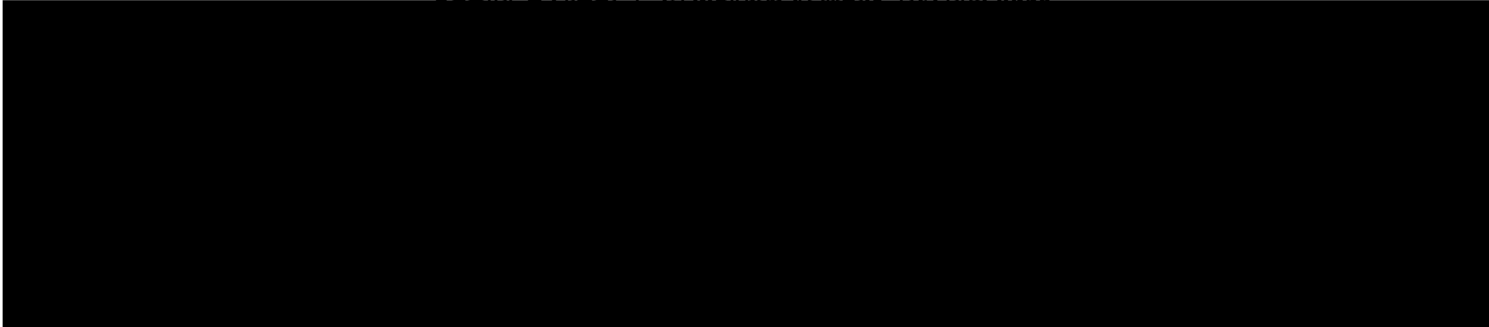
*Thank You
For Your*



LINCOLN

OURISMAN

6129 RICHMOND HWY.
ALEXANDRIA, VA 22303
SERVICE DIRECT: 703-660-0450 MAIN: 703-660-9000



AXLE/DIFFERENTIAL
REPLACE ELECTRIC POWER STEERING RACK PER PRIOR ESTIMATE
COMPLETED

PARTS	QTY	FP NUMBER	DESCRIPTION	UNIT PRICE	
JOB # 1	1	AE52-3504-EERM	GEAR AS 914365	1387.00	1387.00
				JOB # 1 TOTAL PARTS	1387.00
				JOB # 1 TOTAL LABOR & PARTS	1987.00

WHEEL ALIGNMENT
Added Operation (350MAILN @ 06/16/2017 12:59)
PERFORM 4 WHEEL ALIGNMENT
COMPLETED

PARTS	QTY	FP NUMBER	DESCRIPTION	UNIT PRICE	
				JOB # 2 TOTAL PARTS	0.00
				JOB # 2 TOTAL LABOR & PARTS	149.99

MISC	CODE	DESCRIPTION	CONTROL NO		
JOB # 1	100	\$100.00 COUPON DISCOUNT		-100.00	
				TOTAL - MISC	-100.00

TOTALS

TOTAL LABOR	749.99
TOTAL PARTS	1387.00
TOTAL SUBLET	0.00
TOTAL G.O.G.	0.00
TOTAL MISC CHG.	0.00
TOTAL MISC DISC	-100.00
TOTAL TAX	83.22
TOTAL INVOICE \$	2120.21

CASH CHECK CK NO. []
 VISA MASTERCARD DISCOVER
 AMER XPRESS OTHER CHARGE
 THE USE OF NON-OEM PARTS ARE NOT COVERED BY THE MANUFACTURER
 WARRANTY. LIKE/KIND/QUALITY PARTS MAY BE USED FOR
 NON-WARRANTY REPAIRS.
 YOU MAY RECEIVE A CUSTOMER SATISFACTION SURVEY FROM FORD
 MOTOR CO. REGARDING THIS SERVICE. IF FOR ANY REASON YOU
 CANNOT GRADE US "COMPLETELY SATISFIED" PLEASE CONTACT
 OUR SERVICE DEPARTMENT IMMEDIATELY! YOUR SATISFACTION
 MEANS EVERYTHING TO US! THANK YOU FOR YOUR BUSINESS.

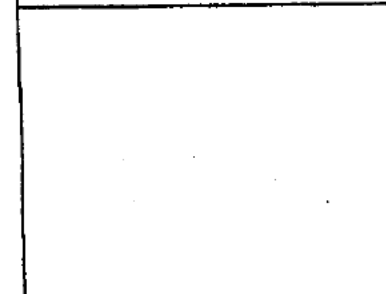
CUSTOMER SIGNATURE

THE PARTS AND LABOR LISTED BELOW:

X
P&A CODE
00141-7

WARRANTY ONLY
 On behalf of servicing dealer, I hereby certify that the information contained hereon is accurate. Unless otherwise shown, services described were performed at no charge to owner. There was no indication from the appearance of the vehicle or otherwise that any part repaired or replaced under this claim had been connected in any way with any accident, negligence or misuse. Records supporting this claim are available for (1) year from the date of payment notification at the servicing dealer for inspection by representatives to Ford.

MONDAY - FRIDAY
 7:00 AM to 7:00 PM
 SATURDAY
 8:00 AM to 4:00 PM



*Thank You
For Your
Business*

WRELFORD SALES INC
6113 RICHMOND HIGHWAY
ALEXANDRIA, VA 22303

05/16/2017

13:02:46

CREDIT CARD

VISA SALE

CARD #

Chip Card:

Chip Card AID:

ATC:

TC:

INVOICE

Seq #:

Batch #:

Approval Code:

Entry Method:

Mode:

SALE AMOUNT

\$2120.21

CUSTOMER COPY



Michael A. Berardi
Director
Service Engineering Operations
Ford Customer Service Division

Ford Motor Company
P. O. Box 1904
Dearborn, Michigan 48121

January 15, 2016

TO: All U.S. Ford and Lincoln Dealers

SUBJECT: **Safety Recall 15S18 – Supplement #2**
Certain 2011-2013 Flex, MKT, Taurus and MKS, 2011-2012 Fusion and MKZ, 2011 Milan, and 2013 Police Interceptor Sedan Vehicles - Reprogram Power Steering Control Module and Steering Gear Extended Coverage

New! REASON FOR THIS SUPPLEMENT

To revise the program terms regarding steering gear replacement.

New! PROGRAM TERMS

This safety recall involves reprogramming the Power Steering Control Module (PSCM), or replacing the steering gear only if there is evidence that certain Diagnostic Trouble Codes (DTCs) exist or were previously set, but are no longer present. If the steering gear is not replaced, the owner will be provided extended coverage of the steering gear under program code 15N01 (See Attachment II "LABOR ALLOWANCES"). This extended coverage provides for one-time replacement of the steering gear if certain DTCs are present, for up to 10 years of service or 150,000 miles from the warranty start date of the vehicle, whichever occurs first. If a vehicle has already exceeded the mileage limit, this program will last through December 31, 2015 for eligible owners. The extended coverage is automatically transferred to subsequent owners.

AFFECTED VEHICLES

Vehicle	Model Year	Assembly Plant	Build Dates
Flex/MKT	2011-2013	Oakville	September 7, 2010 thru February 28, 2012
Taurus/MKS	2011-2013	Chicago	September 7, 2010 thru February 28, 2012
Fusion/MKZ	2011-2012	Hermosillo	September 7, 2010 thru February 28, 2012
Milan	2011		September 7, 2010 thru December 10, 2010
Police Interceptor Sedan	2013	Chicago	August 25, 2011 thru February 28, 2012

Affected vehicles are identified in OASIS.

REASON FOR THIS SAFETY RECALL

In some of the affected vehicles, the power steering system may revert to manual steering mode due to the Power Steering Control Module (PSCM) detecting a motor position sensor fault. In manual steering mode there is still a mechanical linkage between the steering wheel and the road wheels, allowing steering control to be maintained. If this condition should occur, a message will display in the Instrument Cluster Message Center and a chime will sound to inform the driver. Loss of power steering assist would require greater steering effort, especially at lower speeds, which may increase the risk of accident.



Office of the General Counsel

Ford Motor Company
Product Claims Department
P.O. Box 71
Dearborn, Michigan 48121-0071

[Redacted]

September 25, 2017

RE: 2014 Fusion

[Redacted]

Thank you for submitting your claim related to your Ford vehicle for review. Ford values its customers and strives to provide the best vehicles and world class customer service. Our goal is to handle your claim in a timely and fair manner.

Information About the Incident

Please provide the following information that may be helpful to us in evaluating this matter:

- What vehicle part or parts is the subject of the claim?
Gear AS Electric Steering Rack
- Has that part been repaired or replaced since the time of the incident?
(circle one) Yes or No
- At the time of the incident:
 - What was the vehicle mileage? 100,600
 - Was the vehicle engine running? (circle one) Yes or No
 - Were the keys in the ignition of the vehicle? (circle one) Yes or No
- List any after-market items installed on the vehicle (for example, alarms, remote starters or lift kits):
NONE

[Redacted]

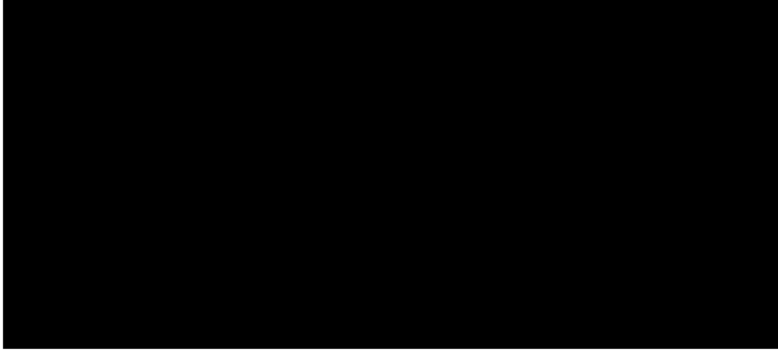
Please provide copies of the following documents when you complete and return this form:

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

Providing Necessary Information

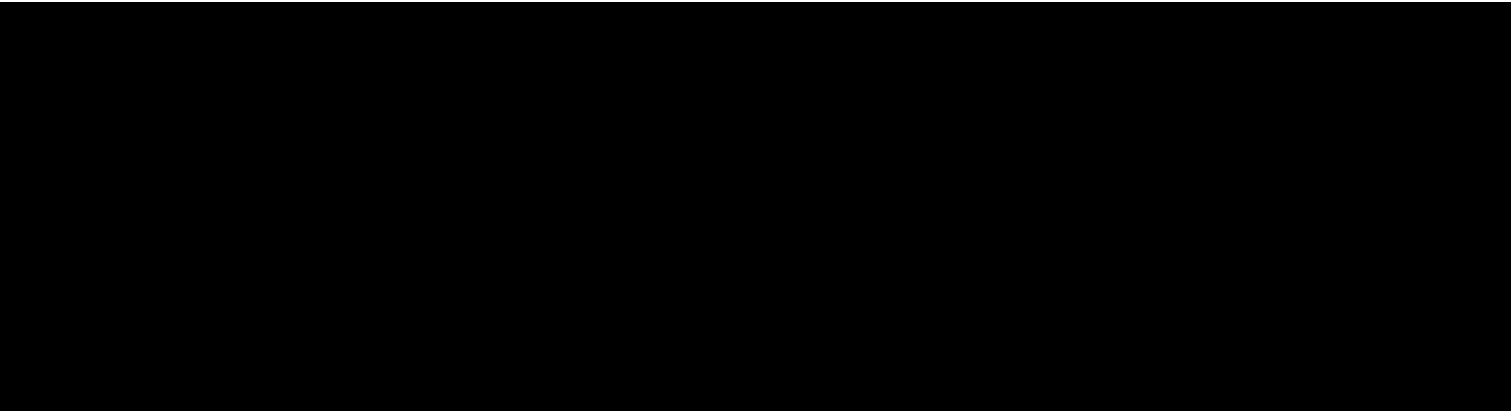
Thank you for bringing this claim to our attention. So that we can adequately review your claim, please provide the requested information within 90 days, or we will assume that you are not interested in pursuing a claim and will close our file.

Sincerely,



Signature





Case Print Report

Case Opened Date 10/27/2016 10:05 AM

Case Closed Date 10/27/2016

Case Status Resolved

Case Last Modified 10/27/2016 10:15 AM

Responsible Team Tier 1 Inbound

Case Classification Legal > Alleged Accident/Property Damage or Fire (Visible flames) due to Product Defect > Insurance Company Contacted/ settlement > Requests Financial Assistance

FORD MOTOR COMPANY
RECEIVED
10/27/2016
10:15 AM
OFFICE OF THE
GENERAL COUNSEL

Year 2010 **Make** FORD

Model FUSION **Body Style** P0H - SE 4-DR SEDAN

Symptom

Level 1 Stop/Steer/Ride

Level 2 Steering / Steering Wheel

Level 3 Performance

Level 4 Inoperative

Case Print Report

Agent Name

Note Created On

10/27/2016 10:14 AM

CUST SAYS:

she lost power steering and she had an accident, there were injuries. Her insurance company has totaled the veh. She would like assistance with her medical bills and her veh.

PER CUST, DLR SAYS:

N/A

CRC ADVISED:

"1. Has the customer filed a claim with their insurance company? Yes

o If YES – continue with remaining questions

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

3. Is the vehicle repairable? no

4. Were any injuries sustained?

5. What are you seeking from Ford Motor Company? assistance with her veh and medical expenses

6. What was the date of the accident? 10-13-2016

7. What product defect is alleged to have caused the accident? loss of power steering

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

9. Was a police report filed? yes

10. If a police report was filed, what were the findings? that witness saw the veh smash into a pole and the passengers were transported to the hospital

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

Worth, TX

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).

13. What mailing address would you like our Office of General Council to send your written response to?

Ford's OGC, you will receive a written response within 15 business days."

Gina Nace

10/31/2016 10:38 AM

CUST SAYS:

She had a 2010 Fusion. The steering wheel locked up and she hit a pole. She went online and saw a recall on this issue. She emailed Ford about it and was told to call in about this issue. The car is being totaled with their insurance company. She is being contacted by lawyers, who so they talk to?

PER CUSTOMER, DEALER SAYS:

NA

CRC ADVISED:

Adv cust of case number and that she would receive written response within 15 business day and that would be Nov 17th. ADV of OGC contact address for lawyer contact

Adv that recalls are very VIN specific and no recall on the steering was on her veh.



Case Print Report

Case Opened Date 3/15/2017 12:47 PM

Case Closed Date 3/15/2017 12:50 PM

Case Status Resolved

Case Last Modified 3/15/2017 12:50 PM

Responsible Team Tier 1 Inbound

Case Classification Legal > Alleged Accident/Property Damage or Fire (Visible flames) due to Product Defect > Customer not willing to work with insurance company > Requests Financial Assistance

Customer Name

Model FUSION

Body Style P0H - FUSION SE 4-DR SEDAN

Symptom

Level 1 Driver Aides & Information

Level 2 Steering Wheel Controls

Level 3 Performance

Level 4 OTHER

Case Print Report

Case Number [REDACTED]

[REDACTED] Time

Not Created On

3/15/2017 12:48 PM

cust says:

he was driving his ford fusion
power steering it went out and he almost wreck and he broke his thumb bec of the accident he paid
for it and wanted ford to assist him and he said its about a recall

per cust/dlr says:

n/a

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.

1. Has the customer filed a claim with their insurance company? no and dont want to
2. If a claim has been filed with their insurance company, what is the status of the claim?no
3. Is the vehicle repairable?n/a
4. Were any injuries sustained? If yes, [REDACTED]
5. What are you seeking from Ford Motor Company?financia, assistance
6. What was the date of the accident?march 10,2017
7. What product defect is alleged to have caused the accident?power steering
8. What is the city and state where the accident occurred?orlando,florida
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)?3410 old wintergarden orlando fl,32805 usa