

This file represents a consolidation of multiple files sent by the manufacturer. Please use the bookmarks to navigate to each file. (Each bookmark label is the name of the original file.)

Case No.	Vehicle ID	Client Name	Client Address	Client Phone	Rep Name	Rep Phone	Owner Name	Owner Address	Owner Phone	Incident State	Litigation	Jurisdiction	Decline No.	Incident Date	Notice Date	Make	Model	MY	VIN	Mileage	Allegations	Ford View	Disposition	Alleged Crash	Alleged Rollover	Alleged Property Dam	Alleged Fire	Alleged Injury	Alleged Fatalities	Category	
Claim			REDACTED	REDACTED	CALIFORNIA LEMON LAW CENTER	818-547-6777	REDACTED	REDACTED	REDACTED	CA	N				9/22/2015	Ford	Fiesta	2012	3FADP4AED	35,945			CLOSED	N	N	N	N	0	0	A1	
Claim			REDACTED	REDACTED	REDACTED		REDACTED	REDACTED	REDACTED	CA	N				1/13/2016	Ford	Fiesta	2012	3FADP4AED	632			CLOSED	N	N	N	N	0	0	A2	
Suit			REDACTED	REDACTED	LAW OFFICES OF LARRY S. HODGSON, P.C.	760-638-0228	REDACTED	REDACTED	REDACTED	CA	Y	State			8/27/2016	Ford	Fiesta	2013	3FADP4AED	23,879			CLOSED	N	N	N	N	0	0	A2	
Suit			REDACTED	REDACTED	CALIFORNIA LEMON LAW GROUP, INC.	866-756-2551	REDACTED	REDACTED	REDACTED	CA	Y	State			8/24/2016	Ford	Fiesta	2013	3FADP4AED				CLOSED	N	N	N	N	0	0	A2	
Claim			REDACTED	REDACTED	REDACTED		REDACTED	REDACTED	REDACTED	FL	N				10/18/2016	Ford	Mustang	2015	1FABP8D4T	18,191			CLOSED	Y	N	N	N	0	0	A1	
Suit			REDACTED	REDACTED	CALIFORNIA LEMON LAW GROUP, INC.	866-451-2551	REDACTED	REDACTED	REDACTED	CA	Y	State			4/21/2017	Ford	Fiesta	2012	3FADP4AED				CLOSED	N	N	N	N	0	0	A2	
Claim			REDACTED	REDACTED	SWANES LAW FIRM	949-459-5503	REDACTED	REDACTED	REDACTED	CA	N				5/9/2017	Ford	Transit Connect	2015	MMEL5T739	5,346			CLOSED	N	N	N	N	0	0	A1	
Claim			REDACTED	REDACTED	MENNETT WEBB	803-765-1130	REDACTED	REDACTED	REDACTED	SC	N				11/06/2017	Ford	Fiesta	2014	3FADP4AED	48,028			CLOSED	N	N	N	N	1	0	A1	
Claim			REDACTED	REDACTED	REDACTED		REDACTED	REDACTED	REDACTED	CA	N				9/11/2018	Ford	C-Max Energi (Plug-In)	2013	1FADP5B6D				CLOSED	Y	N	N	N	1	0	A1	
Suit			REDACTED	REDACTED	THE ARMSTRONG FIRM, PLLC	210-277-0548	REDACTED	REDACTED	REDACTED	TX	Y	State			6	12/13/2018	Ford	Escape	2013	1FACUAGG3C				OPEN	Y	N	N	N	1	0	A1
Suit			REDACTED	REDACTED	DAVID M. KRAMER, PLLC	246-210-6757	REDACTED	REDACTED	REDACTED	ME	Y	State				1/23/2020	Ford	Escape	2013	1FACUAGG3C				OPEN	N	N	N	N	1	0	A1
Claim			REDACTED	REDACTED	REDACTED		REDACTED	REDACTED	REDACTED	GA	N				9/11/2020	Ford	Escape	2014	1FACUAGG3C				CLOSED	N	N	N	N	0	0	A1	
Claim			REDACTED	REDACTED	REDACTED		REDACTED	REDACTED	REDACTED	GA	N				7/14/2020	Ford	Escape	2014	1FACUAGG3C				CLOSED	N	N	Y	N	0	0	A1	
Claim			REDACTED	REDACTED	REDACTED		REDACTED	REDACTED	REDACTED	OR	N				9/14/2020	Ford	Focus	2012	1FAW4P9E3C	186,827			CLOSED	N	N	Y	N	0	0	A1	
Claim			REDACTED	REDACTED	LAW OFFICES OF CAROLINA, JORDON & TAMORA, LLP	760-773-6148	REDACTED	REDACTED	REDACTED	CA	N				10/06/2020	Ford	Fiesta	2013	3FADP4AED	22,183			OPEN	N	N	N	N	0	0	A2	



From: DCPFORM, FMCDDealer (.)
Sent: Tuesday, September 22, 2015 12:23:20 PM (UTC-05:00) Eastern Time (US & Canada)
To: Ordcalp, F (F.); Taylor, Alma (A.)
Cc: rneedham@randallreed.net
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: Randall Reed's Prestige Ford

Requesting Dealer Fleet: Randall Reed's Prestige Ford

PA Code: 09469

Contact Person: Ron Needham

Title: Fixed Operation Director

Phone Number: 214-578-2094

Fax Number: 972-864-3694

Email: rneedham@randallreed.net

Region: Dallas

Address: 3601 S Shiloh

City: Garland

State: Texas

Zip Code: 75041

CUSTOMER VEHICLE INFORMATION:

WSD: 10/29/2012

Vehicle Year: 2013

Vehicle Model: Fiesta

Vehicle VIN: 3FADP4AJ5DM [REDACTED]

Mileage: 38646

customer Fleet Name: [REDACTED]

Street Address: [REDACTED]

City : GARLAND

State : Texas

Zip Code : [REDACTED]

Home Phone: [REDACTED]

Work Phone: [REDACTED]

Customer Region: DALLAS

DETAILS OF INCIDENT:

Accident [REDACTED]

Date of Incident: [REDACTED]

County incident occurred: DALLAS

Is customer alleging a component defect CAUSED the incident? YES

Details: DOOR LATCH FAILED AND OPENED WHILE DRIVING CAUSING DAMAGE

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: RANDALL REED PRESTIGE FORD

Attorney information:

CVO Contact:

Resolution Customer is seeking: VEHICLE DAMAGE BE REPAIRED

Comments:

Case**General Info**

Overview

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

Close Case

Close Case Info

Resolution Type	 Close Issue	Comments
Closure Type	Addressed	

Customer Info

Advanced Search

Search On	Contact	Search By
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Customer Name	 	Caller Type
Best Contact Method		Use for Reply-To
Best Daytime Phone		Customer Delegate
Customer Home Phone		Customer Delegate Phone
Customer Business Phone		Relationship
Customer Mobile Phone		

Vehicle Purchase Status Original Owner

Current CLP LTV Score 25

Customer Scores

Loyalty Score 46

Defector Score

CLP LTV Score 26

Dissat Score

In-Market 32

ESP Score

Likelihood to Service

Service Segments

Loyalty Segment - Mexico

Dealer Info

Dealer Info

Dealer Name  Randall Reed's Prestige Ford

Dealer PA Code 09469

Dealer Service Manager

Dealer Phone Number (972) 864-3673

More than one Service Manager Yes

Dealer Contact

Service Mgr Phone

Portal Status No New Message

FMCC Branch Code

Vehicle Info

Vehicle Info

VIN  3FADP4AJ5DM [REDACTED] Mileage 38,000

Warranty Start Date 10/29/2012

Mileage Units Miles

Vehicle Modifications No

Hours in Service

Original Selling Dealer Lee Jarmon Ford Inc

Converted Mileage

Original Selling PA 02548

Days Out of Service

Number of Repairs

Vehicle Specification

Vehicle Specification Full Path	 2013 > FORD > FIESTA > P4A - S 4-DR SEDAN		
Model Year	 2013	Engines Specification	 1.6L TIVCT PFI 115-123HP SIGMA
Make	 FORD	Transmissions Specification	 5 SPD MAN TRANS A EAO B5/IB5
Model / Vehicle Line	 FIESTA		
Body Style	 P4A - S 4-DR SEDAN		

Case Classification

Classification

Responsible Team	 Tier 1 Inbound
Case Classification Full Path	 Vehicle Concern > Parts Issue > Delay Within CCT/CLP Criteria
Case Classification Level 1	 Vehicle Concern
Case Classification Level 2	 Parts Issue
Case Classification Level 3	 Delay Within CCT/CLP Criteria
Case Classification Level 4	

Classification

Initial Contact Target	Initial Contacted	No
Case Closure Target	9/28/2015 5:00 PM	Initial Contact Date

Symptom Code

Symptom Code

Level 1

Level 2

Level 3

Level 4

Miscellaneous Info**Miscellaneous Info**

Master Case

Caller Authorization 0005885372
Code

Stars ID

Tech Hotline No

FSA Number

Campaign Number

Repair Order
Number

Chat UID

Contract InfoFord Credit Contract
#

Form Letter Code

ESP Contract #

Non-Ford ESP No

Activities**All Activities**

☐	Subject	Activity Type	Activity Status	Priority	Date Created
☐	Close Case	Close Case	Completed	Normal	8/26/2015 5:13 P
☐	Case Resolution	Case Resolution	Completed	Normal	8/26/2015 5:13 P
☐	Did dir confirm repairs.com	Appointment	Completed	Normal	8/25/2015 4:06 P
☐	Did dir confirm repairs.com	Schedule Follow-Up	Completed	Normal	8/25/2015 4:05 P
☐	CALL To - 2148621344	Phone Call	Completed	Normal	8/25/2015 4:00 P
☐	CALL To - 2148621344	Phone Call	Completed	Normal	8/25/2015 2:05 P
☐	CALL To - 66301	Phone Call	Completed	Normal	8/25/2015 1:52 P
☐	CALL To - 51400	Phone Call	Completed	Normal	8/21/2015 11:30
☐	CALL To - 66160	Phone Call	Completed	Normal	8/21/2015 11:21
☐	Check for customer respons	Appointment	Completed	Normal	8/18/2015 1:33 P

1 - 10 of 16 (0 selected)

Page 1

Notes & Article

Notes

Title: Note created on 08/25/2015 04:05 PM by Wendy Grissom-eisenhauer, Default Team: Tier 2 CCT

OBC to dlr - 1344 - spoke with SD Chris. SD will verify that repairs are completed and customer is in possession of her vehicle. Per AWS, repairs are completed as of 8/20/15

Wendy Grissom-eisenhauer **8/25/2015 4:05 PM**

Title: Note created on 08/25/2015 02:05 PM by Wendy Grissom-eisenhauer, Default Team: Tier 2 CCT

OBC to dlr - 1344 - left voicemail message for SD Chris

Wendy Grissom-eisenhauer **8/25/2015 2:05 PM**

Title: Note created on 8/21/2015 11:26 AM by Dennis White, Default Team: Tier 1 Inbound

Cust Says: didnt get a call back, got a text with case number but thats it, wants to know whats going on with veh, havent had it for 2 weeks Per cust, dlr says: Dlr says: CRC Advised: offered to provide case number, cust declined, changed bcm from text to call and trans call to CSM handling case

Dennis White **8/21/2015 11:25 AM**

Title: Note created on 08/18/2015 01:33 PM by Wendy Grissom-eisenhauer, Default Team: Tier 2 CCT

Text to customer: [REDACTED]@messaging.sprintpcs.com [REDACTED]: I am the Senior Regional Customer Service Manager for Ford Motor Company and I work with Randall Reed's Prestige Ford for service-related concerns. You contacted our Customer Relations Center regarding your 2013 Fiesta and the concerns have had with the vehicle. We apologize for the concerns you have experienced. In addition, you have requested that Ford Motor Company replace/repurchase your vehicle. At your request, we have performed a good-faith review and unfortunately, Ford Motor Company will not be replacing/repurchasing your vehicle. It is Ford's obligation to honor your New Vehicle Limited Warranty. Wendy Grissom-Eisenhauer wgrisso2@ford.com | www.ford.com office: 866-6313788 x 77748 fax: 1-866-383-7646

Wendy Grissom-eisenhauer **8/18/2015 1:33 PM**

Title: Note created on 08/17/2015 07:55 AM by Wendy Grissom-eisenhauer, Default Team: Tier 2 CCT

CSM WENDY EXT. 77748. CASE REVIEW: LTV 26, 1 ORIG. VEHICLE, NO ESP, GAS ENGINE, W/S/D 10/29/12. 14E08 REPROGRAM POWERTRAIN CONTROL MODULE 15S16 DOOR LATCH REPLACEMENT REPAIRS IN AWS: 12/2/14 - 33,047 MILES WRENCH LIGHT ON, LACKS POWER PERFORMED TSB 13-11-15

Wendy Grissom-eisenhauer **8/17/2015 7:55 AM**

Title: Note created on 08/14/2015 10:45 AM by Charise Montgomery, Default Team: Tier 1 Inbound

CONTACT VIA: Text [REDACTED] Sprint CUST SAYS: She is seeking a buyback as she doesn't feel this veh is safe. There have been numerous recalls and she has had it in and out of the shop for the last 2 weeks. First for the front door latches and then for the back door latches. PER CUST, DLR SAYS: Not interested in repairing because there was not anyone harmed. CRC ADVISED: I will escalate your case/request to our Ford Regional Customer Service Manager who works daily with your dealership's management team. The Ford Regional Customer Service Manager has access to all Ford resources and will use these resources to assist you and your dealership regarding your situation. The Ford Regional Customer Service Manager will receive the information you have just provided me and will do a thorough review on your behalf. You can expect a phone call from your Customer Service Manager within 1 business day.

Charise Montgomery **8/14/2015 10:45 AM**

Article

Article

Admin Info

Admin Info

Created By	 Charise Montgomery	Modified By	 Wendy Grissom-eisenhauer
Created On	8/14/2015 10:39 AM	Modified On	8/26/2015 5:13 PM
Begin Date	8/14/2015	Case Type	
Title	CAS-[REDACTED]	Source Created By	





CALIFORNIA LEMON LAW
CENTER

January 7, 2016

OGC Lit
Consumer Claims

VIA FIRST CLASS MAIL

JAN 13 2016

Ford Motor Company
Consumer Affairs - Litigation Prevention Department
PO Box 6248, MD 3NE-B
Dearborn, MI 48126-4207

RECEIVED

JAN 12 2016

Re: Armen Allahyarian
2012 Ford Fiesta
VIN: 3FADP4EJXCM [REDACTED]

Dear Gentlemen:

Please be advised that this law firm has been retained by [REDACTED] to enforce his legal rights regarding the purchase of the above identified vehicle. The purpose of this letter is to set forth the facts of this case, cite the applicable law and attempt to resolve this matter as quickly and efficiently as possible.

[REDACTED] was confident that he had made a quality choice with his purchase of his new 2012 Ford Fiesta. (A copy of the purchase contract is enclosed for your reference.) [REDACTED] confidence has now diminished due to numerous unsuccessful repair attempts which have substantially impaired the vehicle to him. This is not what [REDACTED] was promised nor bargained for when he purchased his new 2012 Ford Fiesta.

The subject vehicle suffers from several serious defects and nonconformities to warranty, including, but not limited to: five (5) separate repair attempts for Door Latch concerns, three (3) separate repair attempts for Window concerns, two (2) separate repair attempts for Transmission concerns, two (2) separate repair attempts for Brake concerns, one (1) separate repair attempt for a Air Condition concern, & one (1) separate repair attempt for a No Start concern. Ford Motor Company, with its ability to monitor dealership warranty "claims made" and "claims paid" images, had both *information* and *opportunity* to offer my client a repurchase of this defective vehicle. No offer to repurchase

535 W. Glenoaks Blvd.
Glendale, CA 91202

818-547-5777 Office
818-547-9777 Fax

CALemonLawCenter.com

this defective vehicle has ever been made by Ford Motor Company, despite having this information available. Enclosed for your review are copies of the repair documentation in our client's possession.

██████████ is no longer willing to tolerate this problematic vehicle. Clearly this vehicle has not risen to the level of quality which ██████████ or Ford Motor Company rightfully expects of its products.

Accordingly, it is herein requested that Ford Motor Company acknowledge that ██████████ is not required to live with this problematic vehicle and make restitution to his pursuant to the Song-Beverly Consumer Warranty Act (the "Lemon Law"), California Civil Code sections 1790 et seq., which provides:

If the manufacturer or its representative in this state is unable to service or repair a motor vehicle . . . to conform to the applicable express warranties after a reasonable number of attempts, the manufacturer shall either promptly replace the motor vehicle . . . or promptly make restitution to the buyer . . . However, the buyer shall be free to elect restitution in lieu of replacement.

(B) In the case of restitution, the manufacturer shall make restitution in the amount equal to the actual price paid or payable by the buyer, including any charges for transportation and manufacturer installed options . . . and including any collateral charges such as sales tax, license fees, registration fees and other official fees, plus any incidental damages. . . including but not limited to reasonable repairs, towing and rental car costs actually incurred by the buyer.

The Lemon Law goes on to state:

(a) Any buyer of consumer goods who is damaged by a failure to comply with any obligation under this chapter or under an implied or express warranty or service contract, may bring an action for recovery of damages and other legal and equitable relief. . . .

(c) If the buyer establishes that the failure to comply was willful, the judgment may include, in

addition to the amounts recovered, a civil penalty which shall not exceed two times the amount of actual damages. . . .

(d) If the buyer prevails in an action under this section, the buyer shall be allowed by the court to recover as part of the judgment a sum equal to the aggregate amount of costs and expenses, including attorneys' fees, determined by the court to have been reasonably incurred by the buyer in connection with the commencement and prosecution of such action.

Civ. Code §1794 (emphasis added).

In light of the facts of this case as applied to the Lemon Law, there is no doubt that Ford Motor Company is obligated to make restitution to [REDACTED] for the "lemon" which was sold to him. In light of the facts of this case whose liability is clear, further denial of your obligations under the Lemon Law can only be described as "willful," triggering the civil penalty provision quoted above.

[REDACTED] is willing to litigate this matter, however, he would prefer to resolve it short of filing a lawsuit. Furthermore, I believe it is also in Ford Motor Company's best interests to settle this dispute rather than defending a lawsuit which it will ultimately lose and face the concomitant penalties and expenses which that defense will necessarily entail, including interest and legal fees.

At this time, [REDACTED] is willing to return the subject vehicle to Ford Motor Company and settle this matter for a repurchase of the subject vehicle, including restitution in the following amount:

Down payment	\$5,000.00
Monthly payments (27 including 12/9/2015)	\$6,482.97
Registration	\$TBD
Less use of 360 mi.	(\$53.93)
Attorney's fees	<u>\$2,750.00</u>

SUBTOTAL:..... \$TBD

In addition, it will be required that Ford Motor Company satisfy the outstanding balance owing to the lien holder of the subject vehicle, Ford Financial (An Authorization for the release of the relevant financial information is enclosed.) Please give this demand the serious consideration it deserves.

If I do not hear from you by February 11, 2016, I shall assume that Ford Motor Company is denying its obligations under the law and [REDACTED] will be left with no choice but to initiate legal proceedings.

Thank you for your prompt attention to this matter.

Very truly yours,

California Lemon Law Center, Inc.

[REDACTED]

Lucy Kasparian, Esq.
Lucy@cllcclaw.com

Enclosures

cc: [REDACTED]

535 W. Glenoaks Blvd.
Glendale, CA. 91202

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**NOTICE OF RESCISSION OF CONTRACT,
REJECTION AND/OR REVOCATION OF ACCEPTANCE OF VEHICLE**

I.

Notice is hereby given that [REDACTED] rescinds the purchase contract signed by him/her on August 25, 2012 at Sunrise Ford, an authorized Ford Motor Company. dealership in North Hollywood, CA, by the terms which [REDACTED] entered into purchase of a defective 2012 Ford Fiesta, Vehicle Identification Number VIN: 3FADP4EJXCM [REDACTED] A copy of the Purchase Agreement is attached hereto.

II.

[REDACTED] hereby exercises his rights to revoke acceptance of this vehicle because the vehicle was sold to him under fraud and mistake, and further because it fails to conform to the applicable warranties.

III.

The grounds for rescission of the contract and revocation of acceptance of the vehicle are as follows:

a. Violation of the Repurchase/Replacement Provisions of the Lemon Law

As the repair orders will demonstrate, since the date of inception of the purchase, the vehicle has been in repair an unreasonable number of times and for an unreasonable amount of time due to serious defects in the vehicle, as further illustrated on repair orders. Ford Motor Company and its representatives have been unable to repair the defects and have refused to replace the vehicle or refund to [REDACTED] the money paid for the vehicle pursuant to the Song-Beverly Consumer Warranty Act and the recently passed California Senate Bill 1718 which applies to vehicles purchased or leased after January 1, 2001. As a result, the consideration received by [REDACTED] under the contract has failed in whole or material part through the fault of the manufacturer and its representatives.

[REDACTED] entered into the contract under the mistaken belief that the vehicle was free from defects and was in a fit and merchantable condition. In fact, the vehicle was defective, unfit for use as safe and reliable transportation, and in an unmerchantable condition at the time of the original

purchase. Had [REDACTED] known the true condition of the vehicle, he/she would not have entered and would not have taken delivery of the vehicle.

IV.

Based on the above facts and circumstances, the vehicle has failed in material respect to comply with the representative and warranties made by Ford Motor Company and its authorized representative Sunrise Ford and justifies [REDACTED] to revoke his acceptance of the purchase contract. The public interest would be prejudiced in permitting these contracts to stand, insofar as they were obtained by mistake of fact or fraud and breach of warranty, and insofar as they would permit the maintenance of an unsafe and unreliable vehicle on our public highways, and therefore the contracts should be rescinded.

V.

[REDACTED] with this Notice of Rescission, Rejection and/or Revocation of Acceptance, hereby tenders to Ford Motor Company that certain 2012 Ford Fiesta, Vehicle Identification Number VIN: 3FADP4EJXCM [REDACTED] Demand is hereby made for refund of the full purchase price of the vehicle, as well as all other consequential and incidental damages, along with legal fees and cost, as allowed by law.

Very truly yours,

California Lemon Law Center, Inc.

[REDACTED]

Lucy Kasparian, Esq.
Lucy@cllclaw.com

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Glendale, CA 91202

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SUNRISE FORD

Where Integrity Has Meaning
5500 LANKERSHIM BLVD.
NORTH HOLLYWOOD, CA 91601
PHONE: (818) 752-9000
FAX: (818) 763-1418
www.sunriseford.com



INVOICE

PAGE 1

CUSTOMER #: [REDACTED]
UNIT# [REDACTED]

BURBANK, CA [REDACTED]

HOME: [REDACTED] CONT: N/A
BUS: [REDACTED] CELL: [REDACTED]

SERVICE ADVISOR: 2988 NICHOLAS LAGATTUTA

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG	
RED CANDY	12	FORD FIESTA	3FADP4EJXCM		632/632		
DEL DATE	PROD DATE	WARR EXP	PROMISED	PO NO.	RATE	PAYMENT	INV DATE
25AUG12 DD			WAIT 05SEP12		99.50	CASH	11SEP12
R.O. OPENED	READY	OPTIONS: STK: 1)OAR# 249 350 975					

10:40 04SEP12 08:51 11SEP12

LINE OPCODE TECH TYPE HOURS

A CUSTOMER STATES DRIVERS DOOR DOES NOT LATCH SHUT

CAUSE: REPLACED DRIVERS DOOR LATCH DUE INTERNAL FAILURE WIL NOT LATCH
AT ALL WITH SCREW DRIVER AFTER REPAIR DRIVERS DOOR OPENS AND
CLOSES NORMAL.

23943A TRIM PANEL - FRONT DOOR - REMOVE AND
INSTALL (23942/23943) - L

2813 W95 0.30

1 BE8Z*5421813*B LATCH

(N/C)

23943A6 LATCH ASSEMBLY - FRONT DOOR - REPLACE
(21812/21813/219A64/219A65) - L

(N/C)

2813 W95 1.00

(N/C)

FC: B06 42

PART#: BE8Z*5421813*B

COUNT:

CLAIM TYPE:

AUTH CODE:

0775

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

632 23943A6, 23943A 1.30 REPLACED DRIVERS DOOR LATCH DUE INTERNAL
FAILURE WIL NOT LATCH AT ALL WITH SCREW DRIVER AFTER REPAIR DRIVERS
DOOR OPENS AND CLOSES NORMAL. SET TIRES 32 PSI ALL FOUR TIRES.

B** TAP RENTAL PER TERI G

CAUSE: TAP LOANER DAYS

WTAP TAP RENTAL CAR

999 W95 0.00

(N/C)

FC: A99 82

PART#: TAP1

COUNT:

CLAIM TYPE: TAP1

AUTH CODE:

SUBL HORIZON RENTAL PO 304697

WE APPRECIATE YOUR BUSINESS

THANK YOU FOR BRINGING YOUR VEHICLE TO THE
VALLEY'S QUALITY SERVICE CENTER.

WE ALSO HAVE NEW AND USED FORDS -
NEW LIGHT, MEDIUM AND HEAVY DUTY TRUCKS.

OUR SERVICE CENTER IS OPEN
MONDAY THRU FRIDAY: 7:00 A.M. - 7:00 P.M.
SATURDAY AND SUNDAY: 8:00 A.M. - 5:00 P.M.
TRUCK HOURS
MONDAY THRU FRIDAY: 7:00 A.M. - 7:00 P.M.
SATURDAY: 8:00 A.M. - 5:00 P.M.

STOP BY AND SEE US FOR YOUR REGULAR SERVICE
MAINTENANCE.

THIS IS YOUR RECEIPT AND CLAIM CHECK. ALL PARTS
INSTALLED ARE NEW UNLESS SPECIFIED OTHERWISE.

NOTICE TO CONSUMER:

I acknowledge notice and oral approval of any additional
customer or warranty work performed and/or increase in the
original estimate price; additionally I acknowledge receipt of
additional consumer warranty and service information contained
in the Parts & Service Warranty Disclaimer.

ORIGINAL
ESTIMATE \$

AUTHORIZED
REVISED
ESTIMATE \$

CUSTOMER SIGNATURE

X

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES/ADJ.	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

Notice to Consumer: Please read important information on back.

WARNING: Motor vehicles contain chemicals known to the State of California to cause cancer and birth defects or other reproductive harm. These chemicals are contained in many vehicle components and replacement parts, vehicle fluids, and paints and materials used to maintain vehicles, including but not limited to fuel, oil, batteries, tires, and wheel balancing weights. When you service, clean or maintain your car you will be exposed to listed chemicals contained in used oil, waste and replacement fluids, fumes, greases, primers, touchup paint, certain replacement parts, and particulates from component wear. When you service your car, we will return used components to you upon request. Used parts and components contain chemicals known to the State of California to cause cancer and birth defects or other reproductive harm. To minimize your exposure when servicing, maintaining or cleaning your vehicle: 1) work in a well ventilated area; 2) do not smoke, drink or eat while working; 3) wash your hands when finished or when taking a break; and 4) follow all manufacturer instructions pertaining to proper use and maintenance of motor vehicles and vehicle components. (Printed in accordance with Proposition 65 in Cal. Health & Safety Code §25249.4 et seq.) For further information about Proposition 65, visit: www.p65disclaimer.com

CUSTOMER COPY

Where Integrity Has Meaning

UNIT#

INVOICE

BURBANK, CA

HOME : [REDACTED] CONT: N/A

BUS: _____ CELL: _____

PAGE 2

SERVICE ADVISOR: 2988 NICHOLAS LAGATTITTA



F.I.N. 95-3411682
BAR REG# ARD72998
E.P.A.# CAD981441199



COLOR		YEAR	MAKE/MODEL		VIN	LICENSE	MILEAGE IN/OUT		TAG
RED CANDY		12	FORD FIESTA		3FADP4EJXCM		632/632		
DEL DATE	PROD DATE	WARR EXP	PROMISED		PO NO	RATE	PAYMENT	INV DATE	
25AUG12 DD			WAIT 05SEP12			99.50	CASH	11SEP12	
R.O OPENED		READY		OPTIONS: STK:		1)OAR# 249 350 975			

[illegible]

EST: 0.00 04SEP12 10:40 SA: 29.88

WE APPRECIATE YOUR BUSINESS

THANK YOU FOR BRINGING YOUR VEHICLE TO THE VALLEY'S QUALITY SERVICE CENTER.

WE ALSO HAVE NEW AND USED FORDS-
NEW LIGHT, MEDIUM AND HEAVY DUTY TRUCKS.

OUR SERVICE CENTER IS OPEN
MONDAY THRU FRIDAY: 7:00 A.M. - 7:00 P.M.
SATURDAY AND SUNDAY: 8:00 A.M. - 6:00 P.M.

TRUCK HOURS
MONDAY THRU FRIDAY: 7:00 A.M. - 7:00 P.M.
SATURDAY: 8:00 A.M. - 6:00 P.M.

STOP BY AND SEE US FOR YOUR REGULAR SERVICE MAINTENANCE.

THIS IS YOUR RECEIPT AND CLAIM CHECK. ALL PARTS INSTALLED ARE NEW UNLESS SPECIFIED OTHERWISE.

NOTICE TO CONSUMER:

I acknowledge notice and oral approval of any additional customer or warranty work performed and/or increase in the original estimate price; additionally I acknowledge receipt of additional consumer warranty and service information contained in the Parts & Service Warranty Disclaimer.

ORIGINAL ESTIMATE \$

AUTHORIZED REVISED ESTIMATE \$

CUSTOMER SIGNATURE

X

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES/ADJ.	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

Notice to Consumer: Please read important information on back.

WARNING: Motor vehicles contain chemicals known to the State of California to cause cancer and birth defects or other reproductive harm. These chemicals are contained in many vehicle components and replacement parts, vehicle fluids, and paints and materials used to maintain vehicles, including but not limited to fuel, oil, batteries, brakes, and wheel balancing weights. When you service, clean or maintain your car you will be exposed to listed chemicals contained in used oil, waste and replacement fluids, tires, greases, grime, touchup paint, certain replacement parts, and cleaning products. To minimize your exposure when servicing, maintaining or cleaning your vehicle: 1) work in a well ventilated area; 2) do not smoke, drink or eat while working; 3) wash your hands when finished or when taking a break; and 4) follow all manufacturer instructions pertaining to proper use and maintenance of motor vehicles and vehicle components. (Posted in accordance with Proposition 65 in Cal. Health & Safety Code §25249.5 et seq.) For further information about Proposition 65, visit: <http://www.cdph.ca/Prop65>

CUSTOMER COPY

RQ19-005-83674 000017 LC

SUNRISE FORD

Where Integrity Has Meaning
5500 LANKERSHIM BLVD.
NORTH HOLLYWOOD, CA 91601
PHONE: (818) 752-9000
FAX: (818) 763-1418
www.sunriseford.com



CUSTOMER #: [REDACTED]
UNIT# [REDACTED]
[REDACTED]
BURBANK, CA [REDACTED]
HOME: [REDACTED] CONT:N/A
BUS: [REDACTED] CELL: [REDACTED]

INVOICE

PAGE 1

SERVICE ADVISOR: 2988 NICHOLAS LAGATTUTA

F.I.N. 95-3411682
BAR REG# ARD72998
E.P.A.# CAD981441199

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG	
RED CANDY	12	FORD FIESTA	3FADP4EJXCM		699/699		
DEL DATE	PROD DATE	WARR EXP	PROMISED	PO NO.	RATE	PAYMENT	INV DATE
25AUG12 DD			WAIT 12SEP12		99.50	CASH	25SEP12
R.O. OPENED		READY	OPTIONS:	STK:	1) OAR# 249 350 975		

10:33 10SEP12 11:41 25SEP12

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A CUSTOMER STATES PASSENGERS FRONT DOOR DOES NOT LATCH
CAUSE: CHECKED WITH SCREW DRIVER FOUND LATCH WOULD NOT LATCH INTERNAL
FAILURE. REMOVED FRONT PASSENGER SIDE DOOR PANEL OF REPLACED
DOOR LATCH. - S

23943A TRIM PANEL - FRONT DOOR - REMOVE AND
INSTALL (23942/23943) - L

2813 W95 0.30

1 BE8Z*5421812*B LATCH

(N/C)

23943A6 LATCH ASSEMBLY - FRONT DOOR - REPLACE
(21812/21813/219A64/219A65) - L

(N/C)

2813 W95 1.00

(N/C)

FC: B06 42

PART#: BE8Z*5421812*B

COUNT:

CLAIM TYPE:

AUTH CODE: DDDR3

0775

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

699 23943A, 23943A6 1.30 CHECKED WITH SCREW DRIVER FOUND LATCH WOULD
NOT LATCH INTERNAL FAILURE. REMOVED FRONT PASSENGER SIDE DOOR PANEL OF
REPLACED DOOR LATCH. - SECOND TIME IN CUSTOMER HAD TO HAVE ROPE TIED TO
BOTH FRONT AND REAR DOORS TO KEEP DOORS CLOSED.

B CUSTOMER STATES DRIVERS DOOR WINDOW PLASTIC COVER PEELING/BUBBLING

CAUSE: SUBLET TO BODY SHOP

S10 MISC. QUICK SERVICE-A/C ELECTRICAL-TRIM

999 INC 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

(N/C)

699 SUBLET TO BODY SHOP

C CUSTOMER STATES PASSENGER FRONT DOOR WINDOW PLASTIC COVER
PEELING/BUBBLING

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TRUCK HOURS
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SATURDAY: 8:00 A.M. - 5:00 P.M.

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MAINTENANCE.

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ORIGINAL
ESTIMATE \$

AUTHORIZED
REVISED
ESTIMATE \$

CUSTOMER SIGNATURE

X

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES/ADJ.	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

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FAX: (818) 763-1418
www.sunriseford.com



F.I.N. 95-3411682
BAR REG# ARD72998
E.P.A.# CAD981441199

INVOICE

PAGE 2

SERVICE ADVISOR: 2988 NICHOLAS LAGATTUTA

CUSTOMER #:
UNIT#

BURBANK, CA

HOME: CONT:N/A
BUS: CELL:

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
RED CANDY	12	FORD FIESTA	3FADP4EJXCM		699/699	
DEL DATE	PROD DATE	WARR EXP	PROMISED	P.O.NO	RATE	PAYMENT
25AUG12 DD			WAIT 12SEP12		99.50	CASH
R.O. OPENED	READY	OPTIONS	STK	1) OAR#	249	350 975

10:33 10SEP12 11:41 25SEP12

LINE OPCODE TECH TYPE HOURS

CAUSE: SUBLET TO BODY SHOP

S10 MISC. QUICK SERVICE-A/C ELECTRICAL-TRIM

999 INC 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: (N/C) 0.00

699 SUBLET TO BODY SHOP

EST: 0.00 10SEP12 10:33 SA: 2988

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ORIGINAL ESTIMATE \$
AUTHORIZED REVISED ESTIMATE \$

CUSTOMER SIGNATURE

X

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES/ADJ.	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

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CUSTOMER COPY



B.A.R. # REG ARD11052
P.A. CODE 05537

www.starautogroup.com
1101 SOUTH BRAND BLVD. GLENDALE, CALIFORNIA 91204
SERVICE DIRECT: (818) 502-1901
(818) 956-0977 FAX: (818) 243-0578

LINCOLN
OUR SERVICE DEPT. HOURS:
MONDAY THRU FRIDAY
7:30 A.M. TO 6:30 P.M.
SATURDAY
8:00 A.M. TO 5:00 P.M.
E.P.A. # CAL 000378943
CAL 000381212

ALL PARTS INSTALLED ARE NEW UNLESS SPECIFIED OTHERWISE

CUSTOMER NO.	ADVISOR	TAG NO.	INVOICE DATE	CELL:
	CHARLIE GARCIA	907	10/07/15	
	LABOR RATE	LICENSE NO.	MILEAGE	STOCK NO.
			42,188	
BURBANK, CA	YEAR / MAKE / MODEL	DELIVERY DATE		
	12/FORD/FIESTA/5DR HB SE			
NONE	VEHICLE I.D. NO.	SELLING DEALER NO.		
	3 FAD P 4 E J X C M			
	F.T.E. NO.	P.Q. NO.	R.O. DATE	REPRINT# 1
			09/26/15	
RESIDENCE PHONE	BUSINESS PHONE	COMMENTS		
LABOR & PARTS				
MO: 42188				

15S16 DOOR LATCH REPLACEMENT - CUSTOMER STATES THAT RIGHT
REAR DOOR CAME OPEN WHILE DRIVING AND WILL NOT LATCH AT
TIMES.
RECALL
REPLACE ALL 4 DOOR LATCHES

PARTS	QTY	FP-NUMBER	DESCRIPTION	UNIT PRICE	WARRANTY
JOB # 1	1	DE8Z-54264A26-A	LATCH		
JOB # 1 TOTAL PARTS					0.00
JOB # 1 TOTAL LABOR & PARTS					0.00

CUSTOMER STATES THAT AFTER DRIVING 20 TO 30 MINS WHILE
SHIFTING OR IN 2ND OR 3RD GEAR CUSTOMER HEARS A CLICKING
NOISE. PLEASE CHECK AND ADVISE
HUB BEARING LOOSE
REPLACE LEFT FRONT HUB BEARING HAD PLAY IN IT

PARTS	QTY	FP-NUMBER	DESCRIPTION	UNIT PRICE	WARRANTY
JOB # 2	1	BE8Z-1215-A	BEARING ASY		
JOB # 2	1	BE8Z-1104-A	HUB ASY - WHEEL		
JOB # 2 TOTAL PARTS					0.00
JOB # 2 TOTAL LABOR & PARTS					0.00

CHECK TIRE AIR PRESSURE
RF 35 PSI
LF 35 PSI
RR 35 PSI
LR 35 PSI
TIRE PRESSURE REGULATION
SET TIRE PRESSURE TO SPECS PER CARB REGULATION

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

SPW ON DOOR LATCH SEE LINE 1

PARTS	QTY	FP-NUMBER	DESCRIPTION	UNIT PRICE	WARRANTY
JOB # 4	1	DE8Z-54264A26-A	LATCH		
JOB # 4 TOTAL PARTS					0.00
JOB # 4 TOTAL LABOR & PARTS					0.00

CUSTOMER STATES L/F DOOR GLASS INOP.
LOOSE PIN 8 AT C504



B.A.R. # REG ARD11052
P.A. CODE 05537

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LINCOLN
OUR SERVICE DEPT. HOURS:
MONDAY THRU FRIDAY
7:30 A.M. TO 6:30 P.M.
SATURDAY
8:00 A.M. TO 5:00 P.M.
E.P.A. # CAL 000378943
CAL 000381212

ALL PARTS INSTALLED ARE NEW UNLESS SPECIFIED OTHERWISE

CUSTOMER NO.	ADVISOR CHARLIE GARCIA	TAG NO. 907	INVOICE DATE 10/07/15	CELL: [REDACTED]
[REDACTED]	LABOR RATE	LICENSE NO.	MILEAGE 42,188	COLOR RED/
BURBANK, CA	YEAR / MAKE / MODEL 12/FORD/FIESTA/5DR HB SE	DELIVERY DATE	DELIVERY MILES	STOCK NO.
NONE	VEHICLE I.D. NO. 3 F A D P 4 E J X C M	SELLING DEALER NO.	PRODUCTION DATE	
RESIDENCE PHONE	R.T.E. NO.	P.O. NO.	R.O. DATE 09/26/15	REPRINT# 1
BUSINESS PHONE	COMMENTS			

MO: 42188

VERIFIED THE CUSTOMERS CONCERN, SCANNED FOR CODES-NO CODES
PRESENT. REFER TO WSM SYMPTOM CHART TO PERFORM PINPOINT
TEST E.
E1-REFERENCE VOLTAGE AT C504-7 AND C504-8. FOUND LOOSE PIN 8
AT C504, RESECURED PIN. REINSTALLED DOOR PANEL (DOOR PANEL
WAS REMOVED TO CHECK ALL CONNECTORS AND WIRING HARNESS)
VERIFIED THE REPAIR. WORKING AS DESIGNED

PARTS-----QTY---FP-NUMBER-----DESCRIPTION-----	UNIT PRICE-
	JOB # 5 TOTAL PARTS 0.00
	JOB # 5 TOTAL LABOR & PARTS 0.00
SUBLET-----PO#-----VEND INV#-INV DATE-DESCRIPTION-----	
JOB # 2 122353 10/07/15 PRESS	
	TOTAL - SUBLET WARRANTY 0.00
MISC-----CODE-----DESCRIPTION-----	CONTROL NO-----
JOB # 1 ESP1 ESP \$100 DEDUCTIBLE	
	TOTAL - MISC 100.00
	100.00

ESTIMATE-----
CUSTOMER HEREBY ACKNOWLEDGES RECEIVING
ORIGINAL ESTIMATE OF \$120.00 (+TAX)

TOTALS-----	
STAR FORD LINCOLN APPRECIATES YOUR BUSINESS! IF YOU HAVE ANY QUESTIONS OR CONCERNS PLEASE FEEL FREE TO CONTACT OUR SERVICE MANAGER FRANCES AT 818-502-4660. STAR LOVES THE FACT YOU CHOSE US TO SERVICE AND REPAIR YOUR VEHICLE. STAR FORD LINCOLN'S GOAL IS CUSTOMER SATISFACTION WE HOPE THAT WE EXCEEDED YOUR EXPECTATIONS TODAY!	TOTAL LABOR.... 0.00 TOTAL PARTS.... 0.00 TOTAL SUBLET... 0.00 TOTAL G.O.G.... 0.00 TOTAL MISC CHG. 100.00 TOTAL MISC DISC 0.00 TOTAL TAX..... 0.00

TOTAL INVOICE \$ 100.00

CUSTOMER SIGNATURE



L I N C O L N



B.A.R. # REG ARD11052
P.A. CODE 05537

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OUR SERVICE DEPT. HOURS:
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SATURDAY
8:00 A.M. TO 5:00 P.M.
E.P.A. # CAL 000378943
CAL 000381212

ALL PARTS INSTALLED ARE NEW UNLESS SPECIFIED OTHERWISE

CUSTOMER NO. [REDACTED]	ADVISOR CHARLIE GARCIA	907	TAG NO. [REDACTED]	INVOICE DATE 10/27/15	CELL: [REDACTED]
[REDACTED]	LABOR RATE	LICENSE NO.	MILEAGE 43,313	COLOR RED/	STOCK NO. [REDACTED]
BURBANK, CA [REDACTED] #103	YEAR / MAKE / MODEL 12/FORD/FIESTA/5DR HB SE	VEHICLE I.D. NO. 3 F A D P 4 E J X C M [REDACTED]		DELIVERY DATE	DELIVERY MILES
NONE	R.T.E. NO.	P.O. NO.	R.O. DATE 10/24/15	SELLING DEALER NO.	PRODUCTION DATE
RESIDENCE PHONE [REDACTED]	BUSINESS PHONE	COMMENTS			
LABOR & PARTS					
MO: 43313					

CUST STATES SINCE DOOR LATCH RECALL PERFORMED LEFT FRONT
DOOR GLASS WILL NOT SEAL SHUT AND RIGHT DOOR GLASS HAS CLUNK
NOISE WHEN GOING DOWN SEE ATTACHED HIST
DOOR GLASSES NOT ALIGNED CORRECTLY
ALIGN DOOR GLASSES

4 day

JOB # 1 TOTAL LABOR & PARTS 0.00

ESTIMATE
CUSTOMER HEREBY ACKNOWLEDGES RECEIVING
ORIGINAL ESTIMATE OF \$0.00 (+TAX)

TOTALS

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FACT YOU CHOSE US TO SERVICE AND REPAIR YOUR VEHICLE.
STAR FORD LINCOLN'S GOAL IS CUSTOMER SATISFACTION WE HOPE
THAT WE EXCEEDED YOUR EXPECTATIONS TODAY!

TOTAL LABOR....	0.00
TOTAL PARTS....	0.00
TOTAL SUBLET....	0.00
TOTAL G.O.G....	0.00
TOTAL MISC CHG.	0.00
TOTAL MISC DISC	0.00
TOTAL TAX.....	0.00

TOTAL INVOICE \$ 0.00

CUSTOMER SIGNATURE _____



L I N C O L N

CUSTOMER #:

UNIT#

BURBANK, CA

HOME:

BUS:

CONT:

CELL:

INVOICE

PAGE 1

SERVICE ADVISOR: 6505 AMBER K NEVAREZ

SUNRISE FORD

Where Integrity Has Meaning

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FAX: (818) 763-1418

www.sunriseford.com

F.I.N. 95-3411682

BAR REG# ARD72998

E.P.A.# CAD981441199



COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
RED CANDY	12	FORD FIESTA	3FADP4EJXCM		43407/43407	
DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT
25AUG12 DD			07:54 10NOV15			
R.O. OPENED	READY	OPTIONS:	STK:	1) OAR# 249 350 975	CASH	09NOV15

10:20 07NOV15 16:07 09NOV15

LINE OPCODE TECH TYPE HOURS

A Moved to: 449939C Line: A

LIST NET TOTAL

999 Moved to: 449939C Line: A

999ICSP0 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: (N/C) 0.00

B CUSTOMER STATES R/F DOOR LATCH DOESN'T ALWAYS ALLOW DOOR TO CLOSE
PROPERLY. DOOR LATCH REPLACEMENT ALREADY PERFORMED 09/2015 PER
STAR FORD SEE OASIS

CAUSE: S100 MISC LUBE

2874 W95 0.00

FC: PART#: COUNT:

(N/C)

CLAIM TYPE:

AUTH CODE:

008351

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

43407 INSPECT AND VERIFIED CONCERN. FOUND DOOR LINKAGE BINDING AND
WINDOW REGULATOR CATCHING AGAINST DOOR HANDLE REINFORCEMENT. ACCESS AND
REMOVED WINDOW REGULATOR PANEL AND REMOVED DOOR LATCH. SECURED DOOR
LATCH LINKAGES AND SECURED DOOR HANDLE REINFORCEMENT TO DOOR SKIN.
REASSEMBLED AND RETEST, NO FURTHER CONCERNS WERE FOUND.

CUSTOMER STATES R/F WINDOW CLICKS UPON ROLLING UP AND DOWN. PLS CK &
ADVISE

CAUSE: S100 MISC LUBE

2874 W95 0.00

FC: PART#: COUNT:

(N/C)

CLAIM TYPE:

AUTH CODE:

008351

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: 0.00

43407 CONCERN RELATED TO LINE B, SEE LINE FOR RELATED REPAIRS.

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MONDAY THRU FRIDAY: 7:00 A.M. - 7:00 P.M.
SATURDAY: 8:00 A.M. - 5:00 P.M.

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ORIGINAL
ESTIMATE \$AUTHORIZED
REVISED
ESTIMATE \$

CUSTOMER SIGNATURE

X

DESCRIPTION

TOTALS

LABOR AMOUNT

PARTS AMOUNT

GAS, OIL, LUBE

SUBLET AMOUNT

MISC. CHARGES/ADJ.

TOTAL CHARGES

LESS INSURANCE

SALES TAX

PLEASE PAY
THIS AMOUNT

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RQ19-005-83674 000023 LC

COLOR	Y
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CELL:

PAGE 1

SERVICE ADVISOR:

E.P.A.# CAD981441199



185.50

[illegible]

RQ19-005-83674 000024 LC

SUNRISE FORD

CUSTOMER #:

UNIT#

BURBANK, CA

HOME:

BUS:

CONT:

CELL:

INVOICE

PAGE 1

SERVICE ADVISOR:

6119 BRENDA ASTURIAS

Where Integrity Has Meaning
5500 LANKERSHIM BLVD.
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FAX: (818) 763-1418
www.sunriseford.com



F.I.N. 95-3411682
BAR REG# ARD72998
E.P.A.# CAD981441199

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
RED CANDY	12	FORD FIESTA	3FADP4EJXCM		45822/45822	
DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT
25AUG12 DD			17:00 30DEC15			
R.O. OPENED	READY	OPTIONS:	STK:	1) OAR#	CASH	31DEC15
12:14 30DEC15	09:45 31DEC15			249 350 975		

LINE OPCODE TECH TYPE HOURS

A CUSTOMER STATES LEFT REAR DOOR DOES NOT CLOSE AT TIMES
CAUSE:

LIST NET TOTAL

S10 MISC. QUICK SERVICE-A/C ELECTRICAL-TRIM
6239 W95 0.00

1 AE8Z*5426413*A LOCK ASY - DOOR

(N/C)

FC: PART#: COUNT:

(N/C)

CLAIM TYPE:

AUTH CODE:

002014

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00
45822 INSPECT AND VERIFIED CONCERN. GOT ACCESS TO LEFT REAR DOOR
PANEL ASSEMBLY, TESTED DOOR OPENING AND CLOSING WITHOUT DOOR PANEL.
FOUND LEFT REAR DOOR LATCH BINDING UP CAUSING A FAULT AT TIMES. REMOVED
DEFECTIVE LATCH, INSTALLED NEW LEFT REAR DOOR LATCH RETEST NO FURTHER
CONCERNS WERE FOUND.

B PERFORM MULTI-POINT INSPECTION (2-11)

CAUSE: MULTIPOINT INSPECTION (99P)

99P PERFORM MULTI-POINT INSPECTION (2-11)

6239 INC 0.00

GTIRE CHECKED AND OK

(N/C)

6239 INC 0.00

GBK CHECKED AND OK

(N/C)

6239 INC 0.00

CALLED CALLED CUSTOMER 930AM 12.31.15 VEHICLE

(N/C)

READY

6239 INC 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00
45822 SET TIRE PRESSURE TO 35PSI.

WE APPRECIATE YOUR BUSINESS

THANK YOU FOR BRINGING YOUR VEHICLE TO THE
VALLEY'S QUALITY SERVICE CENTER.

WE ALSO HAVE NEW AND USED FORDS,
NEW LIGHT, MEDIUM AND HEAVY DUTY TRUCKS.

OUR SERVICE CENTER IS OPEN
MONDAY THRU FRIDAY: 7:00 A.M. - 7:00 P.M.
SATURDAY AND SUNDAY: 8:00 A.M. - 5:00 P.M.
TRUCK HOURS
MONDAY THRU FRIDAY: 7:00 A.M. - 7:00 P.M.
SATURDAY: 8:00 A.M. - 5:00 P.M.

STOP BY AND SEE US FOR YOUR REGULAR SERVICE
MAINTENANCE.

THIS IS YOUR RECEIPT AND CLAIM CHECK. ALL PARTS
INSTALLED ARE NEW UNLESS SPECIFIED OTHERWISE.

NOTICE TO CONSUMER:

I acknowledge notice and oral approval of any additional
customer or warranty work performed and/or increase in the
original estimate price; additionally I acknowledge receipt of
additional consumer warranty and service information contained
in the Parts & Service Warranty Disclaimer.

ORIGINAL ESTIMATE \$ _____ AUTHORIZED REVISED ESTIMATE \$ _____

CUSTOMER SIGNATURE

X

DESCRIPTION

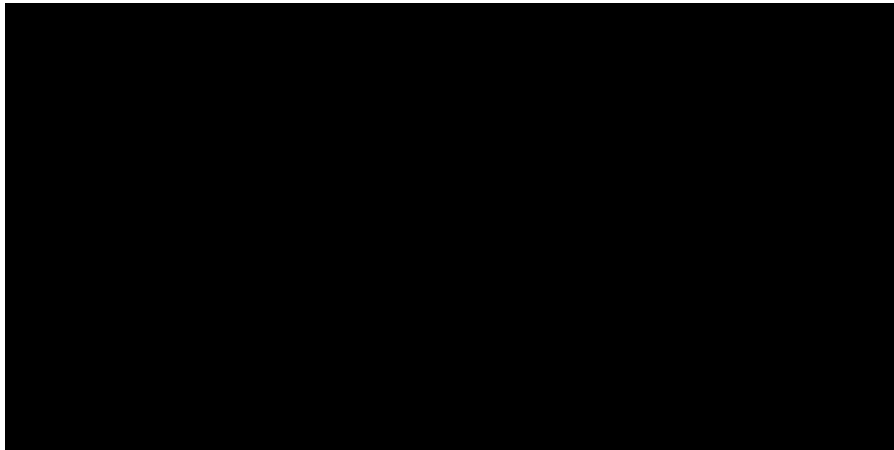
TOTALS

LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES/ADJ.	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

Notice to Consumer: Please read important information on back.

WARNING: Motor vehicles contain chemicals known to the State of California to cause cancer and birth defects or other reproductive harm. These chemicals are contained in many vehicle components and replacement parts, vehicle fluids, and paints and materials used to maintain vehicles, including but not limited to fuel, oil, batteries, brakes, and wheel balancing weights. When you service, clean or maintain your car you will be exposed to these chemicals contained in used oil, waste and replacement fluids, fumes, grease, grime, touchup paint, certain replacement parts, and cleaning materials from component wear. When you service your car, we will return used components to you upon request. Used parts and components contain chemicals known to the State of California to cause cancer and birth defects or other reproductive harm. To minimize your exposure when repairing, maintaining or cleaning your vehicle: 1) work in a well ventilated area; 2) do not smoke, drink or eat while working; 3) wash your hands when finished or when taking a break; and 4) follow all manufacturer instructions pertaining to proper use and maintenance of motor vehicles and vehicle components. (Added in accordance with Proposition 65 in Cal. Health & Safety Code 120125.6 et seq. For further information about Proposition 65, visit: <http://www.valleyqualityservice.com>)

CUSTOMER COPY





**Service of Process
Transmittal**

06/27/2016

CT Log Number 529406405

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

RE: **Process Served in California**

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], Pltfs. vs. Ford Motor Company, et al., Dfts.

DOCUMENT(S) SERVED: Summons, Complaint, Notice, Cover Sheet, Instructions, Certificate

COURT/AGENCY: Riverside County - Superior Court - Palm Springs, CA
Case # [REDACTED]

NATURE OF ACTION: Product Liability Litigation - Lemon Law - 2013 Ford Fiesta, VIN:
3FADP48J5DM [REDACTED]

ON WHOM PROCESS WAS SERVED: C T Corporation System, Los Angeles, CA

DATE AND HOUR OF SERVICE: By Process Server on 06/27/2016 at 15:00

JURISDICTION SERVED : California

APPEARANCE OR ANSWER DUE: Within 30 days after service (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Larry R. Hoddick
Law Offices of Larry R. Hoddick, P.C.
74-000 County Club Drive
Suite C5
Palm Desert, CA 92260
760-636-5256

ACTION ITEMS: CT has retained the current log, Retain Date: 06/28/2016, Expected Purge Date:
07/03/2016
Image SOP
Email Notification, Chris Dzbanski cdzbansk@ford.com
Email Notification, Mary Ann MacKinnon mmackin1@ford.com

SIGNED: C T Corporation System
ADDRESS: 818 West Seventh Street
Los Angeles, CA 90017
TELEPHONE: 213-337-4615

09C LIT 2016JUN28 PM7:05

Page 1 of 1 / DS

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

RQ19-005-83674 000028 LC

6/27/16 @BPR

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

Ford Motor Company; and DOES 1 through 20, Inclusive

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

[REDACTED]

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED

Superior Court of California
County of Riverside

6/24/2016

agarcia1

By Fax

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Superior Court of California
Riverside County Superior Court
3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262

CASE NUMBER:
(Número del Caso):

[REDACTED]

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Law Offices of Larry R. Hoddick, PC 74000 Country Club Dr. Ste. C5, Palm Desert, CA 92260 760.636-5256

DATE: 6/24/2016
(Fecha)

Clerk, by
(Secretario)

A. Garcia

A. GARCIA Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): Ford Motor Company

- under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

4. ☐ by personal delivery on (date):

1 Larry R. Hoddick / SBN 237527
2 LAW OFFICES OF LARRY R. HODDICK, P.C.
3 Attorney at Law
4 74-000 Country Club Drive, Suite C5
5 Palm Desert, CA 92260
6 Tel.: 760/636-5256
7 Fax: 760/299-4220
8 lhoddick@dc.rr.com

FILED
Superior Court of California
County of Riverside

6/21/2016

agarcia1

By Fax

Attorneys for Plaintiffs

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

[REDACTED]

Plaintiffs,

vs.

FORD MOTOR COMPANY; and DOES 1 through 20, Inclusive,

Defendants.

Case No. [REDACTED]

COMPLAINT FOR RESTITUTION
AND DAMAGES BASED ON:
1) VIOLATION OF THE SONG-
BEVERLY CONSUMER
WARRANTY ACT;

DEMAND FOR JURY TRIAL

For cause of action against defendants FORD MOTOR COMPANY; and DOES 1 through 20, inclusive, hereinafter collectively referred to as "defendants," plaintiffs [REDACTED]

[REDACTED] allege as follows:

GENERAL ALLEGATIONS

1. Plaintiffs [REDACTED] and [REDACTED] are at all relevant times an individual residing in the County of Riverside, State of California.

2. Defendant FORD MOTOR COMPANY is at all relevant times a foreign corporation registered to do business in the State of California, and doing business in the County of Riverside, State of California.

1 3. Plaintiff are ignorant of the true names and capacities of the defendants sued
2 herein as DOES 1 through 20 and therefore sues said defendants by such fictitious names. Each
3 reference in this complaint to "defendant," "defendants," or a specifically named defendant
4 refers to each of the named defendants, as well as each of the defendants sued under fictitious
5 names. Plaintiffs will amend this complaint to allege their true names and capacities when
6 ascertained. Plaintiffs are informed and believe that each of the fictitiously named defendants
7 is legally responsible in some manner for the occurrences herein alleged, and that Plaintiff's
8 damages were proximately caused by such occurrences.

9 4. Plaintiffs are informed and believe that at all times mentioned herein
10 defendants, and each of them, were the owners, agents, servants, employees, partners, alter ego,
11 and/or joint venturers of their co-defendants and were at all relevant times acting within the
12 course, scope and authority of said ownership, agency, master/servant, employment,
13 partnership, alter ego, and/or joint venture relationship.

14 5. To the extent that any defendant is an independent contractor, Plaintiffs allege
15 that each of the other defendants exercised such dominion and control over the manner,
16 method, and means of the work contracted for, that the acts of any such independent contractor
17 should by law be attributed to the principal who hired such contractor for the work performed.

18 6. On or about April 17, 2013, Plaintiffs purchased a new 2013 Ford Fiesta motor
19 vehicle (hereinafter the "vehicle") bearing Vehicle Identification Number
20 3FADP48J5DM [REDACTED] pursuant to the terms of a Retail Installment Sale Contract.

21 7. The sale of the vehicle to Plaintiffs was accompanied by an express warranty
22 pursuant to Civil Code § 1791.2(a), wherein defendant FORD MOTOR COMPANY undertook
23 to provide the vehicle to Plaintiffs free from defects, and to preserve or maintain the utility or
24 performance of the vehicle, or provide compensation if there is a failure in utility or
25 performance of the vehicle for a period of 3 years or for 36,000 miles, whichever occurred first,
26 and if there is a failure in utility or performance of the drivetrain for a period of 5 years or
27 60,000 miles, whichever occurs first; and a warranty extension by defendant FORD MOTOR
28 COMPANY if there is a failure in utility or performance of the transmission for a period of 7

1 years or 100,000 miles, whichever occurs first.

2 8. In addition to the express warranties contained within the sale transaction,
3 defendant FORD MOTOR COMPANY impliedly warranted to Plaintiffs that the vehicle was
4 "merchantable" within the meaning of Civil Code § 1791.1, and "fit for the purpose for which
5 it was being purchased" within the meaning of Civil Code § 1792.1.

6 9. After Plaintiffs purchased the vehicle, Plaintiffs used the vehicle in accordance
7 with the normal operation of the vehicle, and did not mishandle, misuse, or otherwise damage
8 the vehicle.

9 10. Within the applicable express warranty and implied warranty periods, Plaintiffs
10 discovered that the vehicle was defective, and failed to perform properly, and has since failed
11 to conform to the terms of the express warranty and implied warranties. The vehicle has been
12 presented to Ford Motor Company's authorized repair facilities an excessive number of times
13 for substantial defects and/or non-conformities involving causing the transmission to shudder,
14 jerk, stall out and shift inappropriately, the audio and blue tooth system malfunctions, the door
15 latches fail and the door open while the vehicle is being driven, the a/c does not blow cold, and
16 the window switch is inoperable, in addition to other defects. The aforementioned defects cause
17 substantial impairments to the use, value and/or safety of the vehicle to Plaintiffs.

18 11. Pursuant to Civil Code § 1793.2(b), Plaintiffs delivered the vehicle to FORD
19 MOTOR COMPANY'S authorized service and repair facilities in California for service and
20 repair of defects as stated above in paragraph 10.

21 12. The vehicle was bought and used primarily for personal, family or household
22 purposes.

23 13. Defendant FORD MOTOR COMPANY has committed a willful violation of the
24 Song-Beverly Consumer Warranty Act and has breached the express warranty and implied
25 warranties described in this complaint in that the vehicle defects in were not remedied after a
26 reasonable number of attempts to do so, the vehicle qualifies as a "new motor vehicle" under
27 the Act, and defendant FORD MOTOR COMPANY has refused to replace the vehicle or
28 reimburse Plaintiffs as required under Civil Code § 1793.2(d).

1 23. The defects and nonconformities present in this vehicle when it was delivered to
2 Plaintiffs , and the defects and nonconformities that were present thereafter, manifested
3 themselves within the applicable express warranty period and/or the implied warranty period.
4 Those defects and nonconformities substantially impair the use, value and/or safety of the
5 vehicle.

6 24. Plaintiffs have delivered the vehicle to defendant manufacturer's authorized
7 repair facilities for repair of the vehicle's defects and nonconformities on numerous occasions
8 within the express and implied warranty periods that accompanied the sale of the vehicle to
9 Plaintiffs .

10 25. Defendants have been unable or unwilling to conform the vehicle to its implied
11 warranty. Defendants have been unable to conform the vehicle to its express warranty after a
12 reasonable number of attempts.

13 26. Plaintiffs have performed all terms, conditions, covenants, promises and
14 obligations required to be performed on Plaintiffs' part under the terms of the sale agreement,
15 and express warranty and implied warranty except for those terms, conditions, covenants,
16 promises and obligations or payments for which performance and/or compliance has been
17 excused by the acts and/or conduct of defendants and/or by law.

18 27. Despite Plaintiffs' entitlement, defendant FORD MOTOR COMPANY has
19 refused Plaintiffs' demand for restitution.

20 28. By failing to remedy the defects and nonconformities as alleged above, or to
21 make restitution with Plaintiffs, defendants are in breach of their obligations under the Act.

22 29. Plaintiffs are justifiably entitled to revoke acceptance of this vehicle under the
23 Act and to receive restitution in the form of reimbursement of the purchase price paid by
24 Plaintiffs.

25 30. Plaintiffs have suffered actual damages in an amount within the jurisdiction of
26 this Court resulting from defendants' failure to comply with their obligations under the Act.

27 31. Plaintiffs are entitled to recover under the Act, as part of the judgment, a sum
28 equal to the aggregate amount of costs and expenses, including attorney's fees reasonably

1 incurred in connection with the commencement and prosecution of this action.

2 32. Defendants' breach of the warranty was willful and deliberate, entitling
3 Plaintiffs to a civil penalty of two times the actual damages in addition to the other amounts
4 recovered, pursuant to Civil Code § 1794.

5 WHEREFORE, Plaintiffs pray for judgment against defendants, and each of them, as
6 follows:

7 ON PLAINTIFFS' FIRST CAUSE OF ACTION FOR VIOLATION OF THE SONG-
8 BEVERLY CONSUMER WARRANTY ACT AGAINST DEFENDANTS FORD
9 MOTOR COMPANY; AND DOES 1 THROUGH 20, INCLUSIVE:

- 10 1. For actual, general, and special damages in an amount within the jurisdiction of
11 this Court, and according to proof at trial;
- 12 2. For restitution of all monies paid under the sale contract, in an amount
13 according to proof at trial;
- 14 3. For incidental and consequential damages, including loss of use and reasonable
15 rental car expenses, according to proof at trial;
- 16 4. For pre-judgment interest at the legal rate;
- 17 5. For a civil penalty of up to two times actual damages in an amount according to
18 proof at trial;
- 19 6. For reasonable attorney's fees and costs of suit; and
- 20 7. For such further relief as the Court deems just and proper.

21
22 DATED: June 21, 2016

LAW OFFICES OF LARRY R. HODDICK, P.C.
Attorney at Law

23
24 By: 

Larry R. Hoddick
Attorney for Plaintiffs

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
3255 E. Tahquitz Cyn Way
Palm Springs, CA 92262
www.riverside.courts.ca.gov

NOTICE OF DEPARTMENT ASSIGNMENT FOR ALL PURPOSES

GUZMAN VS FORD MOTOR COMPANY

CASE NO. [REDACTED]

This case is assigned to the Honorable Judge David M. Chapman in Department PS2 for all purposes.

The Case Management Conference is scheduled for 12/21/16 at 8:30 in Department PS2.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6(a) (2) shall be filed in accordance with that section.

Requests for accommodations can be made by submitting Judicial Council form MC-410 no fewer than five court days before the hearing. See California Rules of Court, rule 1.100.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing NOTICE on this date, by depositing said copy as stated above.

Court Executive Officer/Clerk

Date: 06/24/16

by: A. GARCIA

ADRIANA GARCIA, Deputy Clerk

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Larry R. Hoddick / SBN 237527 Law Offices of Larry R. Hoddick, P.C. 74-000 Country Club Drive, Suite C5 Palm Desert, CA 92260 TELEPHONE NO.: (760) 636-5256 FAX NO.: (760) 299-4220 ATTORNEY FOR (Name): Plaintiff		FOR COURT USE ONLY CASE NUMBER: JUDGE: DEPT:
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Riverside STREET ADDRESS: 3255 E. Tahquitz Canyon Way MAILING ADDRESS: CITY AND ZIP CODE: Palm Springs, CA 92262 BRANCH NAME: Palm Springs Courthouse		
CASE NAME: v. Ford Motor Company; et al.		
CIVIL CASE COVER SHEET ☒ Unlimited (Amount demanded exceeds \$25,000) ☐ Limited (Amount demanded is \$25,000 or less)	Complex Case Designation ☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:
- | | | |
|--|---|--|
| Auto Tort
☐ Auto (22)
☐ Uninsured motorist (46)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)
Non-PI/PD/WD (Other) Tort
☐ Business tort/unfair business practice (07)
☐ Civil rights (08)
☐ Defamation (13)
☐ Fraud (16)
☐ Intellectual property (19)
☐ Professional negligence (25)
☐ Other non-PI/PD/WD tort (35)
Employment
☐ Wrongful termination (36)
☐ Other employment (15) | Contract
☒ Breach of contract/warranty (06)
☐ Rule 3.740 collections (09)
☐ Other collections (09)
☐ Insurance coverage (18)
☐ Other contract (37)
Real Property
☐ Eminent domain/inverse condemnation (14)
☐ Wrongful eviction (33)
☐ Other real property (26)
Unlawful Detainer
☐ Commercial (31)
☐ Residential (32)
☐ Drugs (38)
Judicial Review
☐ Asset forfeiture (05)
☐ Petition re: arbitration award (11)
☐ Writ of mandate (02)
☐ Other judicial review (39) | Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)
☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)
Enforcement of Judgment
☐ Enforcement of judgment (20)
Miscellaneous Civil Complaint
☐ RICO (27)
☐ Other complaint (not specified above) (42)
Miscellaneous Civil Petition
☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43) |
|--|---|--|
2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. ☐ Large number of separately represented parties | d. ☐ Large number of witnesses |
| b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. ☐ Substantial amount of documentary evidence | f. ☐ Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): One
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 21, 2016

Larry R. Hoddick / SBN 237527

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)
Auto (22)–Personal Injury/Property Damage/Wrongful Death	Breach of Contract/Warranty (06)	Antitrust/Trade Regulation (03)
Uninsured Motorist (46) <i>(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)</i>	Breach of Rental/Lease Contract <i>(not unlawful detainer or wrongful eviction)</i>	Construction Defect (10)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	Contract/Warranty Breach–Seller Plaintiff <i>(not fraud or negligence)</i>	Claims Involving Mass Tort (40)
Asbestos (04)	Negligent Breach of Contract/Warranty	Securities Litigation (28)
Asbestos Property Damage	Other Breach of Contract/Warranty	Environmental/Toxic Tort (30)
Asbestos Personal Injury/Wrongful Death	Collections (e.g., money owed, open book accounts) (09)	Insurance Coverage Claims <i>(arising from provisionally complex case type listed above)</i> (41)
Product Liability <i>(not asbestos or toxic/environmental)</i> (24)	Collection Case–Seller Plaintiff	Enforcement of Judgment
Medical Malpractice (45)	Other Promissory Note/Collections Case	Enforcement of Judgment (20)
Medical Malpractice–Physicians & Surgeons	Insurance Coverage <i>(not provisionally complex)</i> (18)	Abstract of Judgment (Out of County)
Other Professional Health Care Malpractice	Auto Subrogation	Confession of Judgment <i>(non-domestic relations)</i>
Other PI/PD/WD (23)	Other Coverage	Sister State Judgment
Premises Liability (e.g., slip and fall)	Other Contract (37)	Administrative Agency Award <i>(not unpaid taxes)</i>
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)	Contractual Fraud	Petition/Certification of Entry of Judgment on Unpaid Taxes
Intentional Infliction of Emotional Distress	Other Contract Dispute	Other Enforcement of Judgment Case
Negligent Infliction of Emotional Distress	Real Property	Miscellaneous Civil Complaint
Other PI/PD/WD	Eminent Domain/Inverse Condemnation (14)	RICO (27)
Non-PI/PD/WD (Other) Tort	Wrongful Eviction (33)	Other Complaint <i>(not specified above)</i> (42)
Business Tort/Unfair Business Practice (07)	Other Real Property (e.g., quiet title) (26)	Declaratory Relief Only
Civil Rights (e.g., discrimination, false arrest) <i>(not civil harassment)</i> (08)	Writ of Possession of Real Property	Injunctive Relief Only <i>(non-harassment)</i>
Defamation (e.g., slander, libel) (13)	Mortgage Foreclosure	Mechanics Lien
Fraud (16)	Quiet Title	Other Commercial Complaint Case <i>(non-tort/non-complex)</i>
Intellectual Property (19)	Other Real Property <i>(not eminent domain, landlord/tenant, or foreclosure)</i>	Other Civil Complaint <i>(non-tort/non-complex)</i>
Professional Negligence (25)	Unlawful Detainer	Miscellaneous Civil Petition
Legal Malpractice	Commercial (31)	Partnership and Corporate Governance (21)
Other Professional Malpractice <i>(not medical or legal)</i>	Residential (32)	Other Petition <i>(not specified above)</i> (43)
Other Non-PI/PD/WD Tort (35)	Drugs (38) <i>(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)</i>	Civil Harassment
Employment	Judicial Review	Workplace Violence
Wrongful Termination (36)	Asset Forfeiture (05)	Elder/Dependent Adult Abuse
Other Employment (15)	Petition Re: Arbitration Award (11)	Election Contest
	Writ of Mandate (02)	Petition for Name Change
	Writ–Administrative Mandamus	Petition for Relief From Late Claim
	Writ–Mandamus on Limited Court Case Matter	Other Civil Petition
	Writ–Other Limited Court Case Review	
	Other Judicial Review (39)	
	Review of Health Officer Order	
	Notice of Appeal–Labor	
	Commissioner Appeals	

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

☐ BANNING 135 N. Alessandro Rd., Banning, CA 92220
☐ BLYTHE 265 N. Broadway, Blythe, CA 92225
☐ HEMET 880 N. State St., Hemet, CA 92343
☐ MORENO VALLEY 13800 Heacock St., Ste. D201, Moreno Valley, CA 92553

☐ MURRIETA 30755-D Auld Rd., Suite 1226, Murrieta, CA 92563
☒ PALM SPRINGS 3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262
☐ RIVERSIDE 4050 Main St., Riverside, CA 92501
☐ TEMECULA 41002 County Center Dr., #100, Temecula, CA 92591

RI-030

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address) Larry R. Hoddick / SBN 237527 Law Offices of Larry R. Hoddick, P.C. 74-000 Country Club Drive, Suite C5 Palm Desert, CA 92260 TELEPHONE NO. (760) 636-5256 E-MAIL ADDRESS (Optional): lhoddick@dc.rr.com ATTORNEY FOR (Name): Plaintiff FAX NO. (Optional): (760) 299-4220 PLAINTIFF/PETITIONER: [REDACTED] DEFENDANT/RESPONDENT: Ford Motor Company; et al.	FOR COURT USE ONLY FILED Superior Court of California County of Riverside 6/21/2016 agarcia1 By Fax CASE NUMBER: [REDACTED]
CERTIFICATE OF COUNSEL	

The undersigned certifies that this matter should be tried or heard in the court identified above for the reasons specified below:

- ☒ The action arose in the zip code of: [REDACTED]
- ☐ The action concerns real property located in the zip code of: _____
- ☐ The Defendant resides in the zip code of: _____

For more information on where actions should be filed in the Riverside County Superior Courts, please refer to Local Rule 1.0015 at www.riverside.courts.ca.gov.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date 06/21/16

Larry R. Hoddick

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY MAKING DECLARATION)

(SIGNATURE)

mm CA

**LAW OFFICES OF
LARRY R. HODDICK, P.C.**

Larry R. Hoddick
Attorney at Law

74-000 COUNTRY CLUB DRIVE, SUITE C5
PALM DESERT, CA 92260

TELEPHONE: (760) 636-5256
FACSIMILE: (760) 299-4220

Writer's E-mail Address:
lhoddick@dc.rr.com

OGC Lit
Consumer Claims

April 19, 2016

Ford Motor Company
Consumer Affairs Division
PO Box 9248 MD-3NE-B
Dearborn, MI 48126

APR 25 2016

RECEIVED
APR 22 2016

Sent via First Class Mail

Re.: [REDACTED]
Vehicle: 2013 Ford Fiesta
VIN #: 3FADP48J5DM [REDACTED]
Purchase Date: April 17, 2013

Dear Gentlepersons,

We have been retained to represent [REDACTED] and [REDACTED] regarding their claims and rights related to the purchase of a 2013 Ford Fiesta, VIN #3FADP48J5DM [REDACTED]. Please direct all correspondence regarding this matter to our office and do not discuss this matter directly with our clients without the express written consent of this office.

Please review the attached repair records. This vehicle has been presented to authorized Ford dealers on at least 4 occasions during the express warranty period for repairs to defects causing the transmission to shudder, jerk, stall out and shift inappropriately, the audio and blue tooth system malfunctions, the door latches fail and the door open while the vehicle is being driven, the a/c does not blow cold, and the window switch is inoperable. The vehicle must now go back in 10 weeks to have the transmission seals and clutches replaced. Following the failed repair presentations to the dealer, they cannot fix the doors. These substantial defects impair the use, value and/or safety of the vehicle to our clients.

There has already been a reasonable amount of time for the Ford dealer to conform this vehicle to its express and implied warranties, but Ford has been unable to do so. Ford is now in violation of California Civil Code section 1793.2(b).

This letter will serve as notice that Ford Motor Company is hereby required to make restitution with our client in accordance with the Song-Beverly Consumer Warranty Act, Cal. Civ. Code § 1793.2(d)(2), and/or section Cal. Civ. Code § 1794, the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(3), and remedies for breach of warranty under California UCC §§ 2313, 2315; provisions concerning sales of goods and the implied warranties of merchantability and fitness for a particular purpose.

Ford Motor Company is a seller, distributor, supplier and/or warrantor in breach of the implied warranties of merchantability and fitness for a particular purpose; said warranties, which accompanied the sale of this vehicle to our clients.

Our clients have lost all confidence in this vehicle due to the above mentioned problems. [REDACTED] and [REDACTED] are due restitution, costs, expenses and attorney's fees reasonably incurred in connection with this action as an appropriate remedy for the failure of Ford dealers to repair this vehicle to conform to the express warranty. Our clients hereby exercise their free choice under the law to elect restitution in lieu of replacement. Our clients are also entitled to justifiably revoke acceptance of this vehicle under the law, and hereby revoke acceptance of the vehicle.

This letter serves as any pre-lawsuit notice that may be required by the consumer warranty statutes. We hereby give you fourteen (14) days to make an appropriate remedy for these violations as suggested above.

Please contact our office once you have reviewed this matter. We have been instructed by our client to proceed accordingly should you fail to make an appropriate remedy as demanded.

Very truly yours,

LAW OFFICES OF LARRY R. HODDICK, P.C.
Attorneys at Law

By: [REDACTED]

Larry R. Hoddick, Esq.

Encl.

02/25/16 03:59PM

FIESTA FORD

Page 24

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

RO Number:

Open Date: 08/09/13

Mileage: 4125

Service Logon: FF-S

Close Date: 09/21/13

SA Number: 97024

Cashier: annie

Comments: APPROVED BY WARRANTY TO REPLACE THE BLOWER MOTOR PO# 688313870 FOR THE AMOUNT OF \$ 249.19

Line Code: A

Comeback: N

Booker ID: 97024

Complaint: WARR LEFT AND RIGHT REAR DOORS DO NOT CLOSE

Cause: .

Labor Type: ISP

Technician Number: 97869

Op Code: WARR

Comeback RO Number:

Description: PARTS ORDERED

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: B

Comeback: N

Booker ID: 97024

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor Type: ISP

Technician Number: 97869

Op Code: PSI

Comeback RO Number: [REDACTED]

Description: y

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Story for Line A, Version Number 1

4125 PART ORDER,BOTH LATCHS

Story for Line B, Version Number 1

4125 FRONT 33 REAR 33

SOP

02/25/16 03:59PM

FIESTA FORD

Page 25

History Report for Vehicle: [REDACTED]

Customer#: [REDACTED]
Customer Name: [REDACTED]

RO Number: [REDACTED]

Open Date: 07/01/13 Mileage: 14644 Service Logon: FF-S
Close Date: 07/01/13 SA Number: 97281 Cashier: celia

Line Code: A Comeback: N Booker ID: 97281

Complaint: CP PER CUSTOMER REQUEST REMOVE AND REPLACE DRIVER SIDE TAIL LAMP ASSY. (PARTS WERE ORDERED BY JOE IN PARTS ON FRIDAY)

Labor Type: CPOL Technician Number: 97869
Op Code: CP Comeback RO Number: [REDACTED]
Description: CUSTOMER PAY REPAIR ORDER
Labor\$: 54.50
Parts\$: 110.41
Miscellaneous\$: 0.00

~~Line Code: A Comeback: N Booker ID: 97281~~

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor Type: CPOL Technician Number: 97869
Op Code: PSI Comeback RO Number: [REDACTED]
Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Story for Line A, Version Number 1

14644 BROKEN LABOR 0.5 REMOVED AND REPLACED LEFT REAR TAIL LAMP LENS ASSY

Story for Line A, Version Number 2

14644 BROKEN REMOVED AND REPLACED LEFT REAR TAIL LAMP LENS ASSY

Estimate Information

Total: 170.00
Date/Time: 07/01/13 08:39:03
Changed By: 97281 MCGRAW,ROBERT BLU
Contacted:

02/25/16 03:59PM

FIESTA FORD

Page 22

History Report for Vehicle: [REDACTED]

Customer#: [REDACTED]

Customer Name: [REDACTED]

RO Number: [REDACTED]

Open Date: 09/21/13

Mileage: 6109

Service Logon: FF-S

Close Date: 09/21/13

SA Number: 97024

Cashier: sortiz

Line Code: A

Comeback: N

Booker ID:

Complaint: WARR LEFT AND REAR DOORS DO NOT CLOSE- INSTALL SPO RO # 199053

Cause: .

Labor Type: WF

Technician Number: 97632

Op Code: WARR

Comeback RO Number: [REDACTED]

Description: LEFT REAR DOOR LATCH

Labor\$: 0.00

Parts\$: 135.87

Miscellaneous\$: 0.00

Line Code: B

Comeback: N

Booker ID:

Complaint: Q99P PERFORM MULTI POINT INSPECTION AND FILL OUT REPORT CARD.

Labor Type: ISO

Technician Number: 97357

Op Code: Q99P

Comeback RO Number:

Description: PERFORM MULTI POINT INSPECTION AND FILL OUT REPORT CARD.

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISO

Technician Number: 97357

Op Code: GBATT

Comeback RO Number: [REDACTED]

Description: BATTERY TESTS GOOD AT THIS TIME

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISO

Technician Number: 97357

Op Code: GBK

Comeback RO Number: [REDACTED]

Description: BRAKE LINING OVER 5 MM (DISC PADS)

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISO

Technician Number: 97357

Op Code: GTIRE

Comeback RO Number: [REDACTED]

Description: TREAD DEPTH 7/32 OF AN INCH

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: C

Comeback: N

Booker ID:

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor Type: ISO

Technician Number: 97357

Op Code: PSI

Comeback RO Number: [REDACTED]

Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

02/25/16 03:59PM

FIESTA FORD

Page 23

History Report for Vehicle: [REDACTED]

Customer#:
Customer Name:



Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Line Code: D Comeback: N Booker ID:
Complaint: CP11 ROTATE TIRES, CHECK BRAKE LININGS

Labor Type: ISP Technician Number: 97357
Op Code: CP11 Comeback RO Number:
Description: ROTATE TIRES, CHECK BRAKE LININGS
Labor\$: 5.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Line Code: E Comeback: N Booker ID:
Complaint: CP WASH

Labor Type: ISO Technician Number: 97357
Op Code: CP Comeback RO Number: [REDACTED]
Description: WASH
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Story for Line A, Version Number 1
6109 WONT CLOSED DIAH REPLACE INOP LEFTV REAR DOOR LATCH.PART ORDER ON RT-REAR LATCH

Story for Line C, Version Number 1
6109 SET 32 PSI

Story for Line D, Version Number 1
6109 FRONT 8MM REAR 3MM

02/25/16 03:59PM

FIESTA FORD

Page 19

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

RO Number:

Open Date: 10/04/13

Mileage: 6895

Service Logon: FF-S

Close Date: 11/20/13

SA Number: 97024

Cashier: jamesb

Line Code: A

Comeback: N

Booker ID: 97191

Complaint: WARR RIGHT REAR DOOR DOES NOT CLOSE

Cause: .

Labor Type: WF

Technician Number: 97632

Op Code: 27406B5

Comeback RO Number:

Description: LATCH-REAR DOOR - REPLACE (26412/264A00) - L

Labor\$: 93.62

Parts\$: 141.36

Miscellaneous\$: 0.00

~~Line Code: B~~

~~Comeback: N~~

~~Booker ID: 97024~~

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor Type: ISP

Technician Number: 97632

Op Code: PSI

Comeback RO Number:

Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: C

Comeback: N

Booker ID: 97024

Complaint: Q99P .

Labor Type: ISP

Technician Number: 97632

Op Code: Q99P

Comeback RO Number:

Description: PERFORM MULTI POINT INSPECTION AND FILL OUT REPORT CARD.

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Story for Line A, Version Number 1

6895 FOUND LATCH BINDING, REPLACE LATCH

Story for Line B, Version Number 1

6895 35 PSI FRONT AND REAR

02/25/16 03:59PM

FIESTA FORD

Page 13

History Report for Vehicle: [REDACTED]

Customer#: [REDACTED]
Customer Name: [REDACTED]

RO Number: [REDACTED]

Open Date: 01/20/14 Mileage: 11233 Service Logon: FF-S
Close Date: 01/20/14 SA Number: 97184 Cashier: jamesb

Line Code: A Comeback: N Booker ID: 97191
Complaint: WARR CUSTOMER STATES THE RIGHT FRONT DOOR WINDOW SWITCH IS NOT WORKING / SPECIAL ORDER NOW HERE
Cause: .

CONCERN CODE:

Labor Type: WF Technician Number: 97632
Op Code: 14529AF Comeback RO Number:
Description: POWER WINDOW DOOR SWITCH - REPLACE (14529/148132) - L
Labor\$: 20.80 Failed Part Number: BE82*14529*8A
Parts\$: 37.72 Failed Code: G07 2B
Miscellaneous\$: 0.00 Failed Part Quantity:

Line Code: B Comeback: N Booker ID: 97184
Complaint: Moved to: 211107C Line: A
CONCERN CODE:

Labor Type: CP Technician Number: 97999
Op Code: SRO Comeback RO Number:
Description: Moved to: 211107C Line: A
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Line Code: C Comeback: N Booker ID: 97191
Complaint: WARR CUSTOMER STATES THE RIGHT REAR DOOR WILL NOT STAY CLOSED UP - SPECIAL ORDER PARTS NOW HERE
Cause: .
CONCERN CODE:

Labor Type: ISP Technician Number: 97632
Op Code: WARR Comeback RO Number: [REDACTED]
Description: PERFORM WARRANTY REPAIRS PER CUSTOMER CONCERN
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Story for Line A, Version Number 1

11233 DIAGNOSIS, FOUND RIGHT FRONT WINDOW SWITCH INOP, REPLACED WINDOW SWITCH, RETEST OK.

Story for Line C, Version Number 1

11233 MONT LATCH CHECK OUT VERIFY CONCERN. REMOVED LEFT REAR DOOR PANEL WINDOW REGULATOR AND OUTSIDE HANDLE FOR ACCESS TO REPLACING DOOR LATCH LOCK ACTUATOR ASSY REASSEMBLE RETEST OPERATION OK.

02/25/16 03:59PM

FIESTA FORD

Page 8

History Report for Vehicle: [REDACTED]

Customer#: [REDACTED]

Customer Name: [REDACTED]

RO Number: [REDACTED]

Open Date: 08/16/14 Mileage: 19089 Service Logon: FF-S
Close Date: 08/17/14 SA Number: 97235 Cashier: jamesb

Line Code: A Comeback: N Booker ID: 97191
Complaint: WARR RIGHT FRONT DOOR WON'T LATCH, PART IS IN STOCK
Cause: FAILED LATCH

CONCERN CODE:

Labor Type: WF Technician Number: 97171
Op Code: 23943A Comeback RO Number:
Description: TRIN PANEL - FRONT DOOR - REMOVE AND INSTALL (23942/23943) - L
Labor\$: 31.83 Failed Part Number: BEBZ*5421B12*8
Parts\$: 141.83 Failed Code: 815 69
Miscellaneous\$: 0.00 Failed Part Quantity:

Labor Type: WF Technician Number: 97171
Op Code: 23943A6 Comeback RO Number:
Description: LATCH ASSEMBLY - FRONT DOOR - REPLACE (21812/21813/219A64/219A65) - L
Labor\$: 106.10
Parts\$: 0.00
Miscellaneous\$: 0.00

Story for Line A, Version Number 1

19089 WONT LATCH CHECK OUT REMOVED RIGHT FRONT DOOR PANEL WINDOW REGULATOR OUTSIDE DOOR HANDLE FOR ACCESS TO REPLACING DOOR
LATCH ASSEMBLY REASSEMBLE RETEST OPERATION OK.

02/25/16 03:59PM

FIESTA FORD

Page 1

History Report for Vehicle: [REDACTED]

Customer#: [REDACTED]
Customer Name: [REDACTED]

RO Number: [REDACTED]

Open Date: 12/22/14
Close Date: 12/23/14

Mileage: 23979 Service Logon: FF-S
SA Number: 97185 Cashier: jamesb

Line Code: A Comeback: N Booker ID: 97191
Complaint: WARR CUSTOMER STATES COVER BEHIND RIGHT REAR DOOR HANDLE MISSING INSTALL SOP PART
Cause: WARR

CONCERN CODE:

Labor Type: WF Technician Number: 97632
Op Code: 999A Comeback RO Number:
Description: ADDITIONAL - MISC. REPAIRS - L
Labor\$: 21.22 Failed Part Number: 8E8Z*54254K05*AA
Parts\$: 34.43 Failed Code: T53 07
Miscellaneous\$: 0.00 Failed Part Quantity:

Line Code: B Comeback: N Booker ID: 97191
Complaint: WARR CUSTOMER STATES MOLDING FOR RIGHT REAR DOOR WINDOW MISSING INSTALL SOP PART
Cause: WARR

CONCERN CODE:

Labor Type: ISP Technician Number: 97632
Op Code: WARR Comeback RO Number: 234919
Description: PERFORM WARRANTY REPAIRS PER CUSTOMER CONCERN
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Line Code: C Comeback: N Booker ID: 97185
Complaint: Moved to: 236783C Line: A
CONCERN CODE:

Labor Type: CP Technician Number: 97999
Op Code: SRO Comeback RO Number:
Description: Moved to: 236783C Line: A
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Story for Line A, Version Number 1
23979 INSTALL MISSING COVER INSTALL RT-REAR INSIDE HANDLE COVER.

Story for Line B, Version Number 1
23979 MISSING COVER INSTALL RT-REAR UPPER DOOR PANEL TRIM

02/25/16 03:59PM

FIESTA FORD

Page 2

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

RO Number:

Open Date: 12/22/14

Mileage: 23979

Service Logon: FF-S

Close Date: 12/22/14

SA Number: 97185

Cashier: sortiz

Line Code: A

Comeback: N

Booker ID: 97185

Complaint: CP CUSTOMER STATES BLUE LIGHT FOR ALARM DOESNT TURN ON

CONCERN CODE:

Labor Type: CP

Technician Number: 97999

Op Code: CP

Comeback RO Number:

Description: CUSTOMER PAY REPAIR ORDER

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

02/25/16 03:20PM

FIESTA FORD

Page 15

History Report for Vehicle: [REDACTED]

Customer#: [REDACTED]

Customer Name: [REDACTED]

RO Number: [REDACTED]

Open Date: 03/30/15

Mileage: 27237

Service Logon: FF-S

Close Date: 03/30/15

SA Number: 97156

Cashier: sortiz

Line Code: A

Comeback: N

Booker ID: 97156

Complaint: WARR CHECK AND ADVISE, CUSTOMER STATES A.C IS NOT COOLING-BLOWS WARM AIR WHILE DRIVING-ADVISE

CONCERN CODE:

Labor Type: ISP

Technician Number: 97632

Op Code: WARR

Comeback RO Number:

Description: PERFORM WARRANTY REPAIRS PER CUSTOMER CONCERN

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: B

Comeback: N

Booker ID: 97156

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

CONCERN CODE:

Labor Type: ISP

Technician Number: 97632

Op Code: PSI

Comeback RO Number:

Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: C

Comeback: N

Booker ID: 97156

Complaint: WASH PERFORM COURTESY EXTERIOR WASH.

CONCERN CODE:

Labor Type: ISP

Technician Number: 97632

Op Code: WASH

Comeback RO Number:

Description: PERFORM COURTESY EXTERIOR WASH.

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: D

Comeback: N

Booker ID: 97156

Complaint: WARR CHECK AND ADVISE, CUSTOMER STATES TRANSMISSION SHUDDERS EXCESSIVLY WHEN ACCELERATING FROM A STOP

CONCERN CODE:

Labor Type: ISP

Technician Number: 97900

Op Code: WARR

Comeback RO Number:

Description: PERFORM WARRANTY REPAIRS PER CUSTOMER CONCERN

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Story for Line A, Version Number 1

27237 A/C ALL OK HAS TRANS CONCERN. NEEDS SKILL 07

02/25/16 03:20PM

FIESTA FORD

Page 13

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

RO Number:

Open Date: 05/01/15 Mileage: 28669 Service Logon: FF-S
Close Date: 05/04/15 SA Number: 97157 Cashier: jamesb

Line Code: A Comeback: N Booker ID: 97191

Complaint: WARR CUSTOMER STATES BRAKES GRIND - QCM

Cause: 1

CONCERN CODE:

Labor Type: WESP

Technician Number: 97797

Op Code: 2001B1F

Comeback RO Number:

Description: BRAKE SHOES / PAD ASSEMBLIES - HYDRAULIC - REPLACE (2001/2007/2200) - L

Labor\$: 10.61

Failed Part Number: CU2Z*2V001*A

Parts\$: 55.97

Failed Code: A99 30

Miscellaneous\$: 0.00

Failed Part Quantity:

Labor Type: WESP

Technician Number: 97797

Op Code: 2001B1F

Comeback RO Number:

Description: BRAKE SHOES / PAD ASSEMBLIES - HYDRAULIC - INSPECT (2001/2007/2200) - L

Labor\$: 53.05

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: B

Comeback: N

Booker ID: 97157

Complaint: 99P PERFORM MULTI POINT INSPECTION. INSPECT TIRES AND BRAKES. TEST BATTERY. INSPECT STEERING AND SUSPENSION COMPONENTS. CHECK FLUID LEVEL AND CONDITION.

Cause: INSPECTION INCLUDES EXHAUST SYSTEM AND HEAT SHIELDS, COOLING SYSTEM HOSES, SERPENTINE DRIVE BELTS, AND STEERING AND SUSPENSION COMPONENTS, TIRES, BRAKES, AND BATTERY.

CONCERN CODE:

Labor Type: ISP

Technician Number: 97797

Op Code: 99P

Comeback RO Number:

Description: PERFORM MULTI POINT INSPECTION. INSPECT TIRES AND BRAKES. TEST BATTERY. INSPECT STEERING AND SUSPENSION COMPONENTS. CHECK FLUID LEVEL AND CONDITION.

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: C

Comeback: N

Booker ID: 97157

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

CONCERN CODE:

Labor Type: ISP

Technician Number: 97797

Op Code: PSI

Comeback RO Number:

Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Story for Line A, Version Number 1

28669 CHECK BRAKES FRONT PADS GRINDING REPLACE FRONT PADS AND RESURFACE ROTORS

02/25/16 03:20PM

FIESTA FORD

Page 14

History Report for Vehicle:



Customer#:



Customer Name:



02/25/16 03:20PM

FIESTA FORD

Page 10

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

RO Number:

Open Date: 06/24/15

Mileage: 30666

Service Logon: FF-S

Close Date: 06/27/15

SA Number: 97156

Cashier: jamesb

Line Code: A

Comeback: N

Booker ID: 97191

Complaint: WARR CHECK AND ADVISE - CUSTOMER STATES TRANSMISSION SHUDDERS ON ACCELERATION-INSTALL SOP CLUTCH AND SEALS-REFERANCE [REDACTED] DATE 3-30-15

Cause: .

CONCERN CODE:

Labor Type: WF

Technician Number: 97032

Op Code: 150090N

Comeback RO Number:

Description: TSB 15-0090

Labor\$: 519.89

Failed Part Number: BV6Z*7B546*F

Parts\$: 420.56

Failed Code: P27 14

Miscellaneous\$: 0.00

Failed Part Quantity:

Line Code: B

Comeback: N

Booker ID: 97191

Complaint: WARR CHECK AND ADVISE, CUSTOMER STATES BLUETOOTH AUDIO IS INOPARTIVE-WILL NOT SYNC PHONE

Cause: .

CONCERN CODE:

Labor Type: ISP

Technician Number: 97171

Op Code: 999A

Comeback RO Number:

Description: ADDITIONAL - MISC. REPAIRS - L

Labor\$: 30.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: C

Comeback: N

Booker ID: 97191

Complaint: WARR NORMAL-30K SERVICE

Cause: .

CONCERN CODE:

Labor Type: WPMP

Technician Number: 97445

Op Code: MBASIC

Comeback RO Number:

Description: BASIC MAINTENANCE SERVICE - K

Labor\$: 47.32

Parts\$: 47.80

Miscellaneous\$: 0.00

Labor Type: WPMP

Technician Number: 97445

Op Code: MBASIC1

Comeback RO Number:

Description: ENGINE OIL AND OIL FILTER - REPLACE (6714/6731) - L

Labor\$: 7.28

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: WPMP

Technician Number: 97445

Op Code: MBASIC2

Comeback RO Number:

Description: ENGINE AIR FILTER - REPLACE (9601) - L

Labor\$: 3.64

02/25/16 03:20PM

FIESTA FORD

Page 11

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: WPMP

Op Code: MBASIC4

Technician Number: 97445

Comeback RO Number:

Description: CABIN AIR FILTER - REPLACE (19N619) - L

Labor\$: 3.64

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: WPMP

Op Code: MULTI

Technician Number: 97445

Comeback RO Number:

Description: MULTIPOINT INSPECTION

Labor\$: 7.28

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: D

Comeback: N

Booker ID: 97156

Complaint: Q99P PERFORM MULTI POINT INSPECTION AND FILL OUT REPORT CARD.

CONCERN CODE:

Labor Type: ISP

Op Code: Q99P

Technician Number: 97445

Comeback RO Number:

Description: PERFORM MULTI POINT INSPECTION AND FILL OUT REPORT CARD.

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISP

Op Code: RTIRE

Technician Number: 97445

Comeback RO Number:

Description: TREAD DEPTH 3/32 OF AN INCH

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISP

Op Code: GBK

Technician Number: 97445

Comeback RO Number:

Description: BRAKE LINING OVER 5 MM (DISC PADS)

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISP

Op Code: GBATT

Technician Number: 97445

Comeback RO Number:

Description: BATTERY TESTS GOOD AT THIS TIME

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISP

Op Code: RBELT

Technician Number: 97445

Comeback RO Number:

Description: FOUND BELT CRACKS/RECOMMEND NEW DRIVE BELT

Labor\$: 0.00

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISP

Op Code: RBKSYS

Technician Number: 97445

Comeback RO Number:

Description: RECOMMEND BRAKE FLUID EXCHANGE

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: E

Comeback: N

Booker ID: 97156

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

CONCERN CODE:

Labor Type: ISP

Op Code: PSI

Technician Number: 97445

Comeback RO Number: [REDACTED]

Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: F

Comeback: N

Booker ID: 97156

Complaint: WASH PERFORM COURTESY EXTERIOR WASH.

CONCERN CODE:

Labor Type: ISP

Op Code: WASH

Technician Number: 97445

Comeback RO Number: [REDACTED]

Description: PERFORM COURTESY EXTERIOR WASH.

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Story for Line A, Version Number 1

30666 REPROGRAM PCM AND PERFORM RELEARN AS PER TSB 15-0090. EXCESSIVE CLUTCH SLIPPAGE DETECTED. ORDERED CLUTCH AND SEAL KIT. . REPLACE CLUTCH ASSY AND REPLACE BOTH INPUT SHAFT SEALS AS PER TSB 15-0090. PERFORM CLUTCH RELEARN.

Story for Line B, Version Number 1

30666 INOP N-TIME 1.00 CHECK OUT HOOK UP IDS REPROGRAM APIM MODULE

Story for Line C, Version Number 1

30666 FRONT 9MM REAR 3MM DRUMS, LDF, TIRE ROTATION, CHECK BRAKES, TIRES, HOSES AND BELTS, ALL FLUIDS, WIPERS, BATTERY, REPLACED AIR FILTER, CABIN FILTER, CHECK BRAKE LIGHTS, TIRE PRESSURE

Story for Line D, Version Number 1

30666 RECOMMEND SERPENTINE BELT, 3 TIRES, ALIGNMENT, BRAKE FLUID EXCHANGE

Story for Line E, Version Number 1

30666 32PSI

02/25/16 03:20PM

FIESTA FORD

Page 9

History Report for Vehicle: [REDACTED]

Customer#: [REDACTED]
Customer Name: [REDACTED]

RO Number: [REDACTED]

Open Date: 06/29/15 Mileage: 30960 Service Logon: FF-S
Close Date: 06/30/15 SA Number: 97156 Cashier: Jamesb

Line Code: A Comeback: N Booker ID: 97191
Complaint: WARR CHECK AND ADVISE, CUSTOMER STATES BLUETOOTH PHONE WILL NOT CONNECT-ADVISE
Cause: 1

CONCERN CODE:

Labor Type: WF Technician Number: 97869
Op Code: 12652D Comeback RO Number:
Description: MODULE - ACCESSORY PROTOCOL INTERFACE/SYNC - RESET (14B205/14D212) - L
Labor\$: 31.83 Failed Part Number: 14D212
Parts\$: 0.00 Failed Code: A60 04
Miscellaneous\$: 0.00 Failed Part Quantity:

Line Code: B Comeback: N Booker ID: 97191
Complaint: WARR CHECK AND ADVISE, CUSTOMER STATES USB AND CHARGE PORTS ARE INOPARTIVE
CONCERN CODE:

Labor Type: ISP Technician Number: 97869
Op Code: 999A Comeback RO Number:
Description: ADDITIONAL - MISC. REPAIRS - L
Labor\$: 6.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Line Code: C Comeback: N Booker ID: 97156
Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .
CONCERN CODE:

Labor Type: ISP Technician Number: 97869
Op Code: PSI Comeback RO Number: [REDACTED]
Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Story for Line A, Version Number 1

30960 IDS SET UP, BCE DIAGNOSIS, NO CODES, SYNC HAS LATEST SOFTWARE, PERFORMED HARD RESET, RETEST OK.

Story for Line B, Version Number 1

30960 IDS SET UP, BCE DIAGNOSIS, NO CODES, PERFORMED MASTER RESET, RETEST OK.

02/25/16 03:20PM

FIESTA FORD

Page 7

History Report for Vehicle: [REDACTED]

Customer#:

Customer Name:

RO Number:

Open Date: 08/22/15

Mileage: 33055

Service Logon: FF-5

Close Date: 08/22/15

SA Number: 97397

Cashier: jamesb

Line Code: A

Comeback: N

Booker ID: 97191

Complaint: WARR CUSTOMER STATES THE VEHICLE NEEDS TO BE JUMP STARTED CHECK AND ADVISE

Cause: i

CONCERN CODE:

Labor Type: WF

Technician Number: 97869

Op Code: 10654C

Comeback RO Number:

Description: BATTERY - TEST, CHARGE, AND RE-TEST (10653/10654/10655) - L

Labor\$: 21.22

Failed Part Number: BXT*96R*500

Parts\$: 119.95

Failed Code: C31 46

Miscellaneous\$: 0.00

Failed Part Quantity:

Labor Type: WF

Technician Number: 97869

Op Code: 10654C1

Comeback RO Number:

Description: BATTERY - REPLACE (10653/10654/10655) - L

Labor\$: 21.22

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: B

Comeback: N

Booker ID: 97397

Complaint: PSI CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

CONCERN CODE:

Labor Type: ISP

Technician Number: 97422

Op Code: PSI

Comeback RO Number:

Description: CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Line Code: C

Comeback: N

Booker ID: 97397

Complaint: 99P PERFORM MULTI POINT INSPECTION. INSPECT TIRES AND BRAKES. TEST BATTERY. INSPECT STEERING AND SUSPENSION COMPONENTS. CHECK FLUID LEVEL AND CONDITION.

Cause: INSPECTION INCLUDES EXHAUST SYSTEM AND HEAT SHIELDS, COOLING SYSTEM HOSES, SERPENTINE DRIVE BELTS, AND STEERING AND SUSPENSION COMPONENTS, TIRES, BRAKES, AND BATTERY.

CONCERN CODE:

Labor Type: ISP

Technician Number: 97422

Op Code: 99P

Comeback RO Number:

Description: PERFORM MULTI POINT INSPECTION. INSPECT TIRES AND BRAKES. TEST BATTERY. INSPECT STEERING AND SUSPENSION COMPONENTS. CHECK FLUID LEVEL AND CONDITION.

Labor\$: 0.00

Parts\$: 0.00

Miscellaneous\$: 0.00

Labor Type: ISP

Technician Number: 97422

Op Code: GBATT

Comeback RO Number:

Description: BATTERY GOOD

02/25/16 03:20PM
History Report for Vehicle: [REDACTED]

FIESTA FORD

Page 8

Customer#: [REDACTED]
Customer Name: [REDACTED]

Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Labor Type: ISP Technician Number: 97422
Op Code: YBK Comeback RO Number:
Description: MAY REQUIRE FUTURE ATTENTION (DISC: 3MM-5MM OR 4/32" TO 7/32"), (DRUM: 1.01MM-2MM OR 2/32" TO 3/32")
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Labor Type: ISP Technician Number: 97422
Op Code: RTIRE Comeback RO Number:
Description: RECOMEND ALL4 TIRES DOWN TO WEAR BARR;RECOMEND ALL4 TIRES DOWN TO WEAR BARR
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Labor Type: ISP Technician Number: 97422
Op Code: RWIPER Comeback RO Number:
Description: RECOMEND WIPER BLADES
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Line Code: D Comeback: N Booker ID: 97397
Complaint: WASH PERFORM COURTESY EXTERIOR WASH.
CONCERN CODE:

Labor Type: ISP Technician Number: 97422
Op Code: WASH Comeback RO Number: 251105
Description: PERFORM COURTESY EXTERIOR WASH.
Labor\$: 0.00
Parts\$: 0.00
Miscellaneous\$: 0.00

Story for Line A, Version Number 1

33055 BATTERY LOAD TEST FAIL, REPLACED BATTERY, ACES CODE X90DS, DTC CODE 10GCK 1JBS0 00T, 12.34V, 41CCA, CHARGING 14.03V, RETEST OK.

Story for Line B, Version Number 1

33055 35 PSI

CUSTOMER #: [REDACTED]

INVOICE

FIESTA FORD

78-990 VARNER ROAD · INDIO, CALIFORNIA 92203
PHONE (760) 772-8000

MON - FRI 7:00 AM TO 7:00 PM
SATURDAY 7:00 AM TO 4:00 PM

INDIO, CA

HOME: [REDACTED]
BUS: [REDACTED]

CONT: [REDACTED]
CELL: [REDACTED]

PAGE 1

B.A.R. LICENSE # ARD253219 E.P.A. NO. CAL000327941

SERVICE ADVISOR: 97429 RUDY CANTU JR

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
OXFORD WHI	13	FORD FIESTA	3FADP4BJ5DM		35962/35962	
DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT
14APR13	DD18MAR13		17:00 28DEC15		0.00	CASH
R.O. OPENED	READY	OPTIONS:	STK:	DLR:05574		
07:35 28DEC15	16:16 29DEC15	ENG:1.6L TIVCT DURATECH DOHC I4	TRN:POWER SHIFT 6 SPD AUTO TRANS			
LINE OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL

A CUSTOMER STATES RADIO DOES NOT TURN ON.
WARR ORDERED PART.

97632 WF

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: (N/C)
35962 NEEDS ACM AND FCM DISPLAY IN CENTER . ADVISOR TO ORDER 0.00

B 14E08 REPROGRAM POWERTRAIN CONTROL MODULE

WARR REPROGRAMMED PC/TCM

97632 WF

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: (N/C)
35962 PER FSA REPROGRAM PCM AND TCM 0.00

C 15B22 TRANSMISSION CONTROL MODULE REPROGRAMMING FOR OVERT TCM FAILURE
WARNING

WARR SEE LINE B,

97210 WF

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: (N/C)
35962 DONE. SEE LINE B 0.00

D 37500 MILES (60000 KMS) - NORMAL SCHEDULED MAINTENANCE - L
MB37500 37500 MILES (60000 KMS) - NORMAL
SCHEDULED MAINTENANCE - L

97852 WPMP

1 BE8Z*6731*AB KIT - ELEMENT & GASKET - OIL F
4 XO*5W20*QSP MOTORCRAFT SAE 5W-20 API GF-5

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE D: (N/C)
35962 0.00

LOF, PERFORM MULTI POINT INSPECTION, ROTATE TIRES, CK BRAKES, CK ALL
FLUID LEVELS, CK TIRE PRESSURE, CK COLANT
LEVEL, CK BATTERY, CK HOSES AND CLAMPS, FRT 7MM RR 3MM

E CHECK AND SET TIRE PRESSURE TO MFG'S SPECIFICATIONS. FRONT REAR .
PSI CHECK AND SET TIRE PRESSURE TO MFG'S
SPECIFICATIONS. FRONT REAR .

Notice To Our Service Customers

Our charges are not based on actual mechanics time. Factors which influence labor charges may include job complexity, specialized training and equipment and length of time required for the specific job. You will be charged no more than the estimated price approved by you. If we discover that additional or different repairs are necessary, you will be contacted in advance for your approval.

ORIGINAL ESTIMATE #

REVISION REASON ADDITIONAL COST #

ESTIMATE #

AUTHORIZED BY DATE TIME

BY: ☐ IN PERSON ☐ PHONE #

☐ ACKNOWLEDGE NOTICE AND ORAL APPROVAL OF AN INCREASE IN THE ORIGINAL ESTIMATED PRICE.
☐ CUSTOMER ACKNOWLEDGED A RECEIPT OF A COPY HEREOF.

SIGNATURE X DATE

HAZARDOUS WASTE DISPOSAL AS A RESULT OF FEDERAL AND STATE MANDATED MANAGEMENT REGULATIONS A SMALL AMOUNT WILL BE CHARGED FOR THE DISPOSAL OF HAZARDOUS WASTE GENERATED BY THE REPAIRS OF YOUR VEHICLE. HAZARDOUS WASTE ITEMS ARE OIL, OIL FILTERS, SOLVENTS, TIRES, BATTERIES, ASBESTOS, GASOLINE, ANTIFREEZE, ETC. THIS AMOUNT HAS BEEN INCLUDED IN YOUR ORIGINAL ESTIMATE. THE UNDERSIGNED HAS BEEN ADVISED AND MADE AWARE OF THE FOLLOWING RECOMMENDED REPAIRS AND DID NOT WANT TO HAVE REPAIRS DONE AT THIS TIME.

SIGNATURE DATE

RECOMMENDED REPAIRS

P & A CODE: 05439 (CHECK ☒ APPROPRIATE BOX)

☐ CLAIM REVIEW ☐ AUTHORIZATION TO SUBMIT CLAIM ☐ PARTS SHIP OUT

\$ \$ \$

PARTS LABOR TOTAL

Authorized Signature and Date

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

NOTICE TO CONSUMER: PLEASE READ IMPORTANT INFORMATION ON BACK

CUSTOMER #: [REDACTED]

[REDACTED]

FIESTA FORD

78-990 VARNER ROAD • INDIO, CALIFORNIA 92203

PHONE (760) 772-8000

MON - FRI 7:00 AM TO 7:00 PM

SATURDAY 7:00 AM TO 4:00 PM

INVOICE

INDIO, CA

HOME: [REDACTED]

BUS: [REDACTED]

CONT: [REDACTED]

CELL: [REDACTED]

PAGE 2

B.A.R. LICENSE # ARD253219 E.P.A. NO. CAL000327941

SERVICE ADVISOR: 97429 RUDY CANTU JR

COLOR		YEAR	MAKE/MODEL		VIN		LICENSE	MILEAGE IN / OUT		TAG
OXFORD WHI		13	FORD FIESTA		3FADP4BJ5DM			35962/35962		
DEL. DATE		PROD. DATE	WARR. EXP.	PROMISED		PO NO.		RATE	PAYMENT	INV. DATE
14APR13		DD18MAR13		17:00 28DEC15				0.00	CASH	29DEC15
R.O. OPENED		READY		OPTIONS: STK						

07:35 28DEC15 16:16 29DEC15 ENG: 1.6L TIVCT DURATECH DOHC I4

TRN: POWER SHIFT 6 SPD AUTO TRANS

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
97852	ISP						(N/C)
PARTS:	0.00	LABOR:	0.00	OTHER:	0.00	TOTAL LINE E:	0.00
35962	FRT	35PSI	RR	35PSI			

F PERFORM MULTI POINT INSPECTION AND FILL OUT REPORT CARD.

Q99P PERFORM MULTI POINT INSPECTION AND FILL OUT REPORT CARD.

97852 ISP

GBATT BATTERY GOOD

97852 ISP

GBK BRAKE LINING OVER 5 MM (DISC PADS)

97852 ISP

RSTEER RIGHT REAR SHOCK LEAKING

97852 ISP

GTIRE CHECKED AND OK (7/32" OR GREATER)

97852 ISP

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE F: 0.00

G PERFORM COURTESY EXTERIOR WASH.

WASH PERFORM COURTESY EXTERIOR WASH.

97852 ISP

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE G: 0.00

H** UPON MULTIPOINT INSPECTION TECH NOTED BOTH REAR SHOCKS LEAKING.

WARR REPLACED REAR SHOCKS,

97717 WF

2 BE8Z*18125*A SHOCK ABSORBER ASY

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE H: 0.00

35962 RACK UP AND INSPECT, REAR SHOCKS LEAKING, REPLACE REAR SHOCKS AND ROAD TEST

Notice To Our Service Customers

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ORIGINAL ESTIMATE #

REVISED ESTIMATE # REASON ADDITIONAL COST #

AUTHORIZED BY ☐ IN PERSON ☐ PHONE # DATE TIME

☐ ACKNOWLEDGE NOTICE AND ORAL APPROVAL OF AN INCREASE IN THE ORIGINAL ESTIMATED PRICE.
☐ CUSTOMER ACKNOWLEDGED A RECEIPT OF A COPY HEREOF.

SIGNATURE X DATE

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SIGNATURE DATE
P & A CODE: 05439 (CHECK ☒ APPROPRIATE BOX)

☐ CLAIM REVIEW ☐ AUTHORIZATION TO SUBMIT CLAIM ☐ PARTS SOUP OUT

\$ PARTS \$ LABOR \$ TOTAL

Authorized Signature and Date

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

NOTICE TO CONSUMER: PLEASE READ IMPORTANT INFORMATION ON BACK

CUSTOMER #:

FIESTA FORD78-990 VARNER ROAD · INDIO, CALIFORNIA 92203
PHONE (760) 772-8000MON - FRI 7:00 AM TO 7:00 PM
SATURDAY 7:00 AM TO 4:00 PM

INVOICE

PAGE 3

INDIO, CA

HOME: CONT:

BUS: CELL:

B.A.R. LICENSE # ARD253219 E.P.A. NO. CAL000327941

SERVICE ADVISOR: 97429 RUDY CANTU JR

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
OXFORD WHI	13	FORD FIESTA	3FADP4BJ5DM		35962/35962	
DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT
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R.O. OPENED	READY	OPTIONS: STK: DLR:05574				
07:35 28DEC15	16:16 29DEC15	ENG:1.6L TIVCT DURATECH DOHC I4				
LINE OPCODE TECH TYPE HOURS		TRN:POWER SHIFT 6 SPD AUTO TRANS				
EST: 0.00	28DEC15	07:35	SA: 97429	LIST	NET	TOTAL

**Notice To Our Service Customers**

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ORIGINAL ESTIMATE #

REVISED ESTIMATE #	REASON	ADDITIONAL COST #
AUTHORIZED BY	☐ IN PERSON	DATE
BY:	☐ PHONE #	TIME

☐ ACKNOWLEDGE NOTICE AND ORAL APPROVAL OF AN INCREASE IN THE ORIGINAL ESTIMATED PRICE.
☐ CUSTOMER ACKNOWLEDGED A RECEIPT OF A COPY HEREOF.

SIGNATURE X DATE

HAZARDOUS WASTE DISPOSAL. AS A RESULT OF FEDERAL AND STATE MANDATED MANAGEMENT REGULATIONS, A SMALL AMOUNT WILL BE CHARGED FOR THE DISPOSAL OF HAZARDOUS WASTE GENERATED BY THE REPAIRS OF YOUR VEHICLE. HAZARDOUS WASTE ITEMS ARE OIL, OIL FILTERS, SOLVENTS, TIRES, BATTERIES, ASBESTOS, GASOLINE, ANTIFREEZE, ETC. THIS AMOUNT HAS BEEN INCLUDED IN YOUR ORIGINAL ESTIMATE. THE UNDERSIGNED HAS BEEN ADVISED AND MADE AWARE OF THE FOLLOWING RECOMMENDED REPAIRS AND DID NOT WANT TO HAVE REPAIRS DONE AT THIS TIME.

SIGNATURE DATE
 RECOMMENDED REPAIRS:
 P & A CODE: 05439 (CHECK (✓) APPROPRIATE BOX)

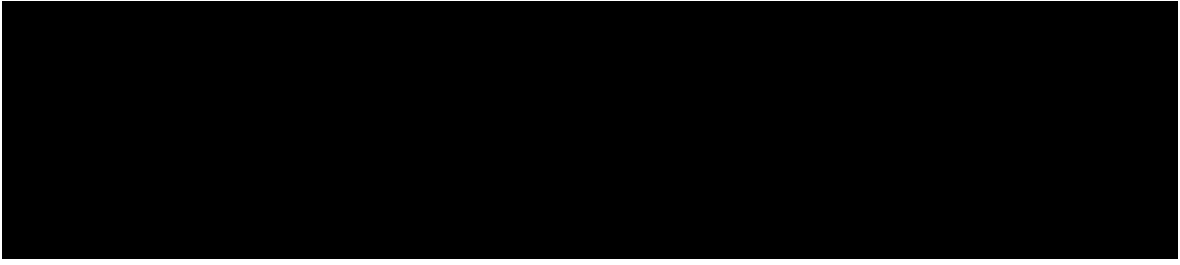
☐ CLAIMS REVIEW	☐ AUTHORIZATION TO SUBMIT CLAIM	☐ PARTS SCRAP OUT
--	--	--

\$	\$	\$
PARTS	LABOR	TOTAL

Authorized Signature and Date

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

NOTICE TO CONSUMER: PLEASE READ IMPORTANT INFORMATION ON BACK RQ19-005-83674 000062 LC





**Service of Process
Transmittal**

08/24/2016

CT Log Number 529732981

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

RE: Process Served in California

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] Pltf. vs. Ford Motor Company, et al., Dfts.

DOCUMENT(S) SERVED: Summons, Complaint, Cover Sheet, Instructions, Certificate, Attachment(s), Notice

COURT/AGENCY: Riverside County - Superior Court - Palm Springs, CA
Case # [REDACTED]

NATURE OF ACTION: Product Liability Litigation - Lemon Law - 2013 Ford Fiesta, VIN:
3FADP4AJ9DM [REDACTED]

ON WHOM PROCESS WAS SERVED: C T Corporation System, Los Angeles, CA

DATE AND HOUR OF SERVICE: By Process Server on 08/24/2016 at 15:00

JURISDICTION SERVED : California

APPEARANCE OR ANSWER DUE: Within 30 days after service (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Deborah L. Horowitz
California Lemon Law Group, Inc.
11440 West Bernardo Court
Suite 300
San Diego, CA 92127
858-451-2554

ACTION ITEMS: CT has retained the current log, Retain Date: 08/24/2016, Expected Purge Date:
08/29/2016

Image SOP

Email Notification, Chris Dzbanski cdzbank@ford.com

Email Notification, Mary Ann MacKinnon mmackin1@ford.com

SIGNED:
ADDRESS: C T Corporation System
818 West Seventh Street
Los Angeles, CA 90017
TELEPHONE: 213-337-4615

OGC LIT 20: 17 7/20/08

8/24/16 @ 3 PM

SUMMONS
(CITACION JUDICIAL)

SUM-100

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

Ford Motor Company and Does 1 through 10, inclusive

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):



FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

AUG 23 2016

Lucero Zuniga

NOTICE: You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO:** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto y debe que precise su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de copias. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desear el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Riverside County Superior Court
3255 E. Tahquitz Canyon Way
Palm Springs, California 92262-6996

CASE NUMBER

PSC

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Deborah L. Horowitz, CA Lemon Law Group, Inc., 11440 W. Bernardo Ct., #300, San Diego, CA 92127
(858) 759-2501

DATE: August 23, 2016
(Fecha)

Clerk, by
(Secretario)

Lucero Zuniga

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010).)



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): Ford Motor Company

- under, ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

4. ☐ by personal delivery on (date):

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. July 1, 2009)

SUMMONS

Page 1 of 1
Code of Civil Procedure § 5 412.20, 455
www.courtinfo.ca.gov

1 CALIFORNIA LEMON LAW GROUP, INC.
2 Deborah L. Horowitz, State Bar No. 216607
3 11440 West Bernardo Court
4 Suite 300
5 San Diego, California 92127
6 Telephone: (858) 759-2501
7 Facsimile: (858) 759-2502
8 E-mail: Debbie@CaliforniaLemonLawGroup.com

9 Attorneys for Plaintiff

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

AUG 23 2016

Lucero Zuniga

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE
PALM SPRINGS COURTHOUSE

PSC

Case No.:

COMPLAINT FOR RESTITUTION
AND DAMAGES

[VIOLATION OF THE SONG-
BEVERLY CONSUMER WARRANTY
ACT]

Complaint Filed: August 23, 2016

Plaintiff,

v.

FORD MOTOR COMPANY, and DOES, 1
through 10, inclusive,

Defendants.

Plaintiff, [REDACTED], alleges as follows:

GENERAL ALLEGATIONS

1. Plaintiff is informed and believes, and thereon alleges, that at all times herein
defendant FORD MOTOR COMPANY, is and was a corporation and registered to do
business in the State of California and doing business in the County of Riverside.

2. The true names and capacities of DOES 1 through 10, inclusive, are not known
to Plaintiff at this time and therefore Plaintiff sues those defendants by such fictitious
names. Plaintiff will amend this complaint to allege the true names and capacities of such
defendants when they are ascertained.

///

1 3. Each of the defendants in this case acted as the principal, agent, employee or
2 other authorized representative in relation to the other; all defendants acted at all times
3 mentioned in this complaint within the course and scope of their respective authority and
4 with the full knowledge and consent of the other defendants. Furthermore, Plaintiff is
5 informed and believe and thereon allege that all acts of corporate employees as hereinafter
6 alleged were authorized or ratified by an officer, director, or managing agent of the
7 corporate employer.

8 4. On or about June 16, 2013, Plaintiff purchased a brand new 2013 Ford
9 Fiesta with Vehicle Identification Number: 3FADP4AJ9DM [REDACTED]

10 5. Pursuant to the Song-Beverly Consumer Warranty Act (hereinafter the "Act") Civil
11 Code sections 1790 et seq., the aforementioned vehicle constitutes a "new motor vehicle."

12 6. Plaintiff is a "buyer" of consumer goods under the Act.

13 7. Defendant FORD MOTOR COMPANY is a "manufacturer" and/or
14 "distributor" under the Act.

15 8. Defendant FORD MOTOR COMPANY offered an "express warranty" to
16 Plaintiff pursuant to the Act.

17 9. The sale of the aforementioned vehicle to Plaintiff was accompanied by an
18 implied warranty that the vehicle was merchantable. The sale of the aforesaid vehicle to
19 Plaintiff was also accompanied by defendant FORD MOTOR COMPANY'S implied
20 warranty of fitness.

21 10. The subject vehicle has suffered from serious defects and non-conformities to
22 warranty, including, but not limited to, the repeated failure of the transmission system. The
23 foregoing defects and non-conformities to warranty manifested themselves within the
24 applicable express warranty period.

25 11. Plaintiff delivered the subject vehicle to an authorized FORD MOTOR
26 COMPANY service and repair facility for repair of the aforementioned defects and non-
27 conformities to warranty on numerous occasions.

28 ///

1 12. Defendant has been unable and/or has refused to conform Plaintiff's vehicle to
2 the applicable express and implied warranties under the Act after a reasonable number of
3 repair attempts. Furthermore, the aforementioned defects and non-conformities to warranty
4 substantially impair the use, value, and/or safety of the subject vehicle to Plaintiff.

5 13. Notwithstanding Plaintiff's entitlement, defendant failed to comply with its
6 obligations under the Act to repurchase the vehicle and make restitution.

7 14. By failure of defendant to comply with its obligations under the Act to repurchase
8 the vehicle and make restitution, defendant is in breach of its obligations under the Act.

9 15. Plaintiff is entitled to justifiably revoke acceptance of the aforementioned
10 vehicle under the Act.

11 16. Under the Act, Plaintiff is entitled to reimbursement of the purchase price paid
12 for the subject vehicle less that amount directly attributable to use by the Plaintiff prior to
13 the discovery of the defects and non-conformities.

14 17. Plaintiff is entitled to all incidental, consequential and general damages
15 resulting from defendant's failure to comply with its obligations under the Act.

16 18. Plaintiff is entitled under the Act to recover as part of the judgment a sum
17 equal to the aggregate amount of costs and expenses, including attorney's fees,
18 reasonably incurred in connection with the commencement and prosecution of this action.

19 19. Plaintiff is entitled in addition to the amounts recovered, a civil penalty of up
20 to two times the amount of actual damages in that defendant has willfully failed to comply
21 with its responsibilities under the Act.

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WHEREFORE, Plaintiff prays for judgment against defendant as follows:

1. For rescission of the contract and restitution of all consideration;
2. For actual compensatory and general damages according to proof at time of trial;
3. That such actual, compensatory and general damages be doubled and awarded
4. Prejudgment interest from date of rescission;
5. For attorney's fees incurred herein according to proof;
6. For costs of suit incurred herein; and
7. For such other and further relief as the Court deems just and proper.

Dated: August 23, 2016

CALIFORNIA LEMONLAW GROUP, INC.
Attorneys for Plaintiff

By:


DEBORAH L. HOROWITZ

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Deborah L. Horowitz, S.B.N. 216607 California Lemon Law Group, Inc. 11440 West Bernardo Court, Suite #300 San Diego, CA 92127 TELEPHONE NO.: (858) 759-2501 FAX NO.: (858) 759-2502 ATTORNEY FOR (Name): Plaintiff		CM-01 FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 3255 E. Tahquitz Canyon Way MAILING ADDRESS: 3255 E. Tahquitz Canyon Way CITY AND ZIP CODE: Palm Springs, California 92262 BRANCH NAME: Palm Springs Courthouse		
CASE NAME: [REDACTED] v. Ford Motor Company and Does 1 through 10, inclusive		
CIVIL CASE COVER SHEET ☒ Unlimited (Amount demanded exceeds \$25,000) ☐ Limited (Amount demanded is \$25,000 or less)	Complex Case Designation ☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: PSC JUDGE: DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)
☐ Auto (22)	☒ Breach of contract/warranty (06)	☐ Antitrust/Trade regulation (03)
☐ Uninsured motorist (45)	☐ Rule 3.740 collections (09)	☐ Construction defect (10)
Other PII/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	☐ Other collections (09)	☐ Mass tort (40)
☐ Asbestos (04)	☐ Insurance coverage (18)	☐ Securities litigation (28)
☐ Product liability (24)	☐ Other contract (37)	☐ Environmental/Toxic tort (30)
☐ Medical malpractice (45)	Real Property	☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)
☐ Other PII/PD/WD (23)	☐ Eminent domain/Inverse condemnation (14)	
Non-PII/PD/WD (Other) Tort	☐ Wrongful eviction (33)	
☐ Business tort/unfair business practice (07)	☐ Other real property (26)	Enforcement of Judgment
☐ Civil rights (08)	Unlawful Detainer	☐ Enforcement of judgment (20)
☐ Defamation (13)	☐ Commercial (31)	Miscellaneous Civil Complaint
☐ Fraud (16)	☐ Residential (32)	☐ RICO (27)
☐ Intellectual property (19)	☐ Drugs (38)	☐ Other complaint (not specified above) (42)
☐ Professional negligence (25)	Judicial Review	Miscellaneous Civil Petition
☐ Other non-PII/PD/WD tort (35)	☐ Asset forfeiture (05)	☐ Partnership and corporate governance (21)
Employment	☐ Petition re: arbitration award (11)	☐ Other petition (not specified above) (43)
☐ Wrongful termination (36)	☐ Writ of mandate (02)	
☐ Other employment (15)	☐ Other judicial review (39)	

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. ☐ Large number of separately represented parties d. ☐ Large number of witnesses
- b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary, declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): One
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related

Date: August 23, 2016.

Deborah L. Horowitz

(TYPE OR PRINT NAME)

SIGNATURE OF PARTY OR ATTORNEY FOR PARTY

NOTICE

- NOTICE
- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
 - File this cover sheet in addition to any cover sheet required by local court rule.
 - If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
 - Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

Form Adopted for Mandatory Use
Judicial Council of California
CM-010 (Rev. July 1, 2007)

CIVIL CASE COVER SHEET

Cal. Rules of Court, rules 2.30, 3.220, 3.400-3.403, 3.740;
Cal. Standards of Judicial Administration, std. 3.10
www.courtinfo.ca.gov

COPY

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (not asbestos or toxic/environmental) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (not medical or legal)
Other Non-PI/PD/WD Tort (35)
Employment
Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (not unlawful detainer or wrongful eviction)
Contract/Warranty Breach—Seller
Plaintiff (not fraud or negligence)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (not provisionally complex) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case
Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal.

Rules of Court Rules 3.400–3.403)
Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (non-domestic relations)
Sister State Judgment
Administrative Agency Award (not unpaid taxes)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (not specified above) (42)
Declaratory Relief Only
Injunctive Relief Only (non-harassment)
Mechanics Lien
Other Commercial Complaint Case (non-tort/non-complex)
Other Civil Complaint (non-tort/non-complex)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (not specified above) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

- ☐ BANNING 311 E. Ramsey St., Banning, CA 92220
- ☐ BLYTHE 265 N. Broadway, Blythe, CA 92225
- ☐ HEMET 880 N. State St., Hemet, CA 92343
- ☐ MORENO VALLEY 13800 Heacock St., Ste. D201,
Moreno Valley, CA 92553

- ☐ MURRIETA 30755-D Auld Rd., Suite 1226, Murrieta, CA 92563
- ☒ PALM SPRINGS 3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262
- ☐ RIVERSIDE 4050 Main St., Riverside, CA 92501

RI-CI032

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address) Deborah L. Horowitz, S.B.N. 216607 California Lemon Law Group, Inc. 11440 West Bernardo Court, Suite 300 San Diego, CA 92127 TELEPHONE NO. (858) 759-2501 FAX NO. (Optional): (858) 759-2502 E-MAIL ADDRESS (Optional): Debbie@CaliforniaLemonLawGroup.com ATTORNEY FOR (Name): Plaintiff PLAINTIFF/PETITIONER: [REDACTED] DEFENDANT/RESPONDENT: Ford Motor Company	FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF RIVERSIDE AUG 23 2016 Lucero Zuniga CASE NUMBER: [REDACTED] PSC
CERTIFICATE OF COUNSEL	

FILED BY EMAIL

The undersigned certifies that this matter should be tried or heard in the court identified above for the reasons specified below:

- ☐ The action arose in the zip code of: _____
- ☒ The action concerns real property located in the zip code of: 92262
- ☐ The Defendant resides in the zip code of: _____

For more information on where actions should be filed in the Riverside County Superior Courts, please refer to Local Rule 1.0015 at www.riverside.courts.ca.gov.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date August 23, 2016

Deborah L. Horowitz

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY MAKING DECLARATION)

[REDACTED SIGNATURE]

(SIGNATURE)

ORIGINAL



SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

www.riverside.courts.ca.gov

Self-represented parties: <http://riverside.courts.ca.gov/selfhelp/self-help.shtml>

**ALTERNATIVE DISPUTE RESOLUTION (ADR) –
INFORMATION PACKAGE**

(California Rules of Court, Rule 3.221; Local Rule, Title 3, Division 2)

***** THE PLAINTIFF MUST SERVE THIS INFORMATION PACKAGE
ON EACH PARTY WITH THE COMPLAINT. *****

What is ADR?

Alternative Dispute Resolution (ADR) is a way of solving legal disputes without going to trial. The main types are mediation, arbitration and settlement conferences.

Advantages of ADR:

- α Faster: ADR can be done in a 1-day session within months after filing the complaint.
- α Less expensive: Parties can save court costs and attorneys' and witness fees.
- α More control: Parties choose their ADR process and provider.
- α Less stressful: ADR is done informally in private offices, not public courtrooms.

Disadvantages of ADR:

- α No public trial: Parties do not get a decision by a judge or jury.
- α Costs: Parties may have to pay for both ADR and litigation.

Main Types of ADR:

Mediation: In mediation, the mediator listens to each person's concerns, helps them evaluate the strengths and weaknesses of their case, and works with them to create a settlement agreement that is acceptable to everyone. If the parties do not wish to settle the case, they go to trial.

Mediation may be appropriate when the parties:

- α want to work out a solution but need help from a neutral person; or
- α have communication problems or strong emotions that interfere with resolution; or
- α have a continuing business or personal relationship.

Mediation is not appropriate when the parties:

- α want their public "day in court" or a judicial determination on points of law or fact;
- α lack equal bargaining power or have a history of physical/emotional abuse.

Arbitration: Arbitration is less formal than trial, but like trial, the parties present evidence and arguments to the person who decides the outcome. In "binding" arbitration the arbitrator's decision is final; there is no right to trial. In "non-binding" arbitration, any party can request a trial after the arbitrator's decision. The court's mandatory Judicial Arbitration program is non-binding.

Arbitration may be appropriate when the parties:

- α want to avoid trial, but still want a neutral person to decide the outcome of the case.

Arbitration is not appropriate when the parties:

- α do not want to risk going through both arbitration and trial (Judicial Arbitration)
- α do not want to give up their right to trial (binding arbitration)

Settlement Conferences: Settlement conferences are similar to mediation, but the settlement officer usually tries to negotiate an agreement by giving strong opinions about the strengths and weaknesses of the case, its monetary value, and the probable outcome at trial. Settlement conferences often involve attorneys more than the parties and often take place close to the trial date.

RIVERSIDE COUNTY SUPERIOR COURT ADR REQUIREMENTS

ADR Information and forms are posted on the ADR website: <http://riverside.courts.ca.gov/adr/adr.shtml>

General Policy:

Parties in most general civil cases are expected to participate in an ADR process before requesting a trial date and to participate in a settlement conference before trial. (Local Rule 3200)

Court-Ordered ADR:

Certain cases valued at under \$50,000 may be ordered to judicial arbitration or mediation. This order is usually made at the Case Management Conference. See the "Court-Ordered Mediation Information Sheet" on the ADR website for more information.

Private ADR (for cases not ordered to arbitration or mediation):

Parties schedule and pay for their ADR process without Court involvement. Parties may schedule private ADR at any time; there is no need to wait until the Case Management Conference. See the "Private Mediation Information Sheet" on the ADR website for more information.

BEFORE THE CASE MANAGEMENT CONFERENCE (CMC), ALL PARTIES MUST:

1. Discuss ADR with all parties at least 30 days before the CMC. Discuss:
 - α Your preferences for mediation or arbitration;
 - α Your schedule for discovery (getting the information you need) to make good decisions about settling the case at mediation or presenting your case at a trial or arbitration.
2. File the attached "Stipulation for ADR" along with the Case Management Statement, if all parties can agree.
3. Be prepared to tell the judge your preference for mediation or arbitration and the date when you could complete it.

(Local Rule 3218)

RIVERSIDE COUNTY ADR PROVIDERS INCLUDE:

- α The Court's Civil Mediation Panel (available for both Court-Ordered Mediation and Private Mediation). See <http://adr.riverside.courts.ca.gov/adr/civil/panelist.php> or ask for the list in the civil clerk's office, attorney window.
- α Riverside County ADR providers funded by DRPA (Dispute Resolution Program Act):
 - Dispute Resolution Service (DRS) Riverside County Bar Association: (951) 682-1015
 - Dispute Resolution Center, Community Action Partnership (CAP): (951) 955-4900

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):		COURT USE ONLY
TELEPHONE NO.: _____ FAX NO. (Optional): _____ E-MAIL ADDRESS (Optional): _____ ATTORNEY FOR (Name): _____		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE ☐ Banning - 311 E. Ramsey Street, Banning, CA 92220 ☐ Hemet - 880 N. State Street, Hemet, CA 92543 ☐ Indio - 46-200 Oasis Street, Indio, CA 92201 ☐ Riverside - 4050 Main Street, Riverside, CA 92501 ☐ Temecula - 41002 County Center Drive, Bldg. C - Suite 100, Temecula, CA 92591		
PLAINTIFF(S):	CASE NUMBER:	
DEFENDANT(S):		
STIPULATION FOR ALTERNATIVE DISPUTE RESOLUTION (ADR) (CRC 3.2221; Local Rule, Title 3, Division 2)		CASE MANAGEMENT CONFERENCE DATE(S):

Court-Ordered ADR:

Eligibility for Court-Ordered Mediation or Judicial Arbitration will be determined at the Case Management Conference. If eligible, the parties agree to participate in:

- ☐ Mediation
 ☐ Judicial Arbitration (non-binding)

Private ADR:

If the case is not eligible for Court-Ordered Mediation or Judicial Arbitration, the parties agree to participate in the following ADR process, which they will arrange and pay for without court involvement:

- ☐ Mediation
 ☐ Judicial Arbitration (non-binding)
☐ Binding Arbitration
 ☐ Other (describe): _____

Proposed date to complete ADR: _____

SUBMIT THIS FORM ALONG WITH THE CASE MANAGEMENT STATEMENT.

PRINT NAME OF PARTY OR ATTORNEY ☐ Plaintiff ☐ Defendant	SIGNATURE OF PARTY OR ATTORNEY _____	DATE _____
PRINT NAME OF PARTY OR ATTORNEY ☐ Plaintiff ☐ Defendant	SIGNATURE OF PARTY OR ATTORNEY _____	DATE _____
PRINT NAME OF PARTY OR ATTORNEY ☐ Plaintiff ☐ Defendant	SIGNATURE OF PARTY OR ATTORNEY _____	DATE _____
PRINT NAME OF PARTY OR ATTORNEY ☐ Plaintiff ☐ Defendant ☐ Additional signature(s) attached	SIGNATURE OF PARTY OR ATTORNEY _____	DATE _____

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
3255 E. Tahquitz Canyon Way
Palm Springs, CA 92262
www.riverside.courts.ca.gov

NOTICE OF DEPARTMENT ASSIGNMENT FOR ALL PURPOSES

[REDACTED] V FORD MOTOR COMPANY

CASE NO. [REDACTED]

This case is assigned to the Honorable Judge James T Latting in Department PS1 for all purposes.

The Case Management Conference is scheduled for 02/21/17 at 8:30 in Department PS1.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Requests for accommodations can be made by submitting Judicial Council form MC-410 no fewer than five court days before the hearing. See California Rules of Court, rule 1.100.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing NOTICE on this date, by depositing said copy as stated above.

Court Executive Officer/Clerk
[REDACTED]

Date: 08/23/16

LUCERO B ZUNIGA, Deputy Clerk



*****Note to Dealer*****

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

*****NOTE: SEND AUTHORIZATION REQUEST TO FORDCALP@FORD.COM*****

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

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

From: DCPFORM, FMCDealer (.)
Sent: Wednesday, October 19, 2016 4:08:48 PM (UTC-05:00) Eastern Time (US & Canada)
To: Ordcalp, F (F.); Taylor, Alma (A.)
Cc: GKry9047@aol.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: Paul Clark Ford

Requesting Dealer Fleet: Paul Clark Ford

PA Code: 04799

Contact Person: GREG KRAJEWSKI
Title: PARTS/SERVICE DIRECTOR
Phone Number: 9042253673
Fax Number:

Email: GKry9047@aol.com

Region: ORLANDO

Address: 464046 SR 200

City: YULEE

State: Florida

Zip Code: 32097

CUSTOMER VEHICLE INFORMATION:

Warranty Start Date: 1/14/2015

Vehicle Year: 2015

Vehicle Model: MUSTANG

Vehicle VIN: 1FA6P8TH2F5[REDACTED]

Mileage: 19191

customer Fleet Name [REDACTED]

Street Address: [REDACTED]

City : JACKSONVILLE

State : Florida

Zip Code : [REDACTED]

Home Phone: [REDACTED]

Work Phone: [REDACTED]

Customer Region: ORLANDO

DETAILS OF INCIDENT:

Accident

Date of Incident: [REDACTED]

County incident occurred: DUVAL

Is customer alleging a component defect CAUSED the incident? YES

Details: CUSTOMER STATES DOOR LATCH FAILED TO KEEP DOOR CLOSED. DOOR OPENED AND CUSTOMER HIT A CULVERT AND THEN HITTING A POLE CAUSING \$4,169.55 DAMAGE.

Was a police report filed? NO

Details :

Has the insurance company been contacted? NO

Insurance company advised: NONE

Insurance company contact information: NONE

Coach builder:

City :

State :

Zip Code :

Vehicle Location: [REDACTED] JACKSONVILLE, FL [REDACTED]

Attorney information:

CVO Contact:

Resolution Customer is seeking: CUSTOMER IS SEEKING \$4,169.55 HER REPAIR BILL AND AN APOLOGY TO HER DAUGHTER FROM FORD.

Comments:

From: [REDACTED]
Subject: REIMBURSEMENT REQUEST:
Date: Oct 19, 2016, 9:32:03 AM
To: [REDACTED]
Bcc: [REDACTED]

REIMBURSEMENT REQUEST:

[REDACTED]
Jacksonville, Florida. [REDACTED]
[REDACTED]

Concerning: Safety Recall: 16S30/NHTSA Recall 16V-643
(VIN): 1FA6P8TH2F5[REDACTED]

This is a request for reimbursement for damages resulting from the recall issues.

On [REDACTED] my 16 year old daughter was leaving a friends house coming home, her story to me was the door flung open; she hit a culvert wall then hit a pole.

Well I was reluctant to believe that story; and thought it due to irresponsible action of not closing the door properly. She has been restricted from driving her car since.

I paid the repairs out of pocket not reporting it to our insurance company for fear of increased rates because of her age.

Now I know she was telling the truth

And now I look like a bad parent for not believing her.

[REDACTED] always stuck to her story even at the cost of not being able to driver her car.

She's an excellent student that carries a 3.5 and above GPA as well as a dual enrolled student.

Being such a mature teenager: This is why her Dad and I purchased her the Mustang for her 15th Birthday.

I would like for her to receive a letter of apology from the company as I myself have had to make apology to her. This has truly been a traumatic experience for her. I'm Thankful it was damage to her car and not her or anyone else.

What would add to the apology is; if you could put her in for

The Ford Motor Company College Scholarship Fund.

My daughters name is [REDACTED]

She attends:

[REDACTED] / Senior High School
Baldwin, Florida.

Thank You for Your Prompt Attention to This Matter;
SINCERELY

[REDACTED]

JACKSONVILLE, FLORIDA [REDACTED]
[REDACTED]



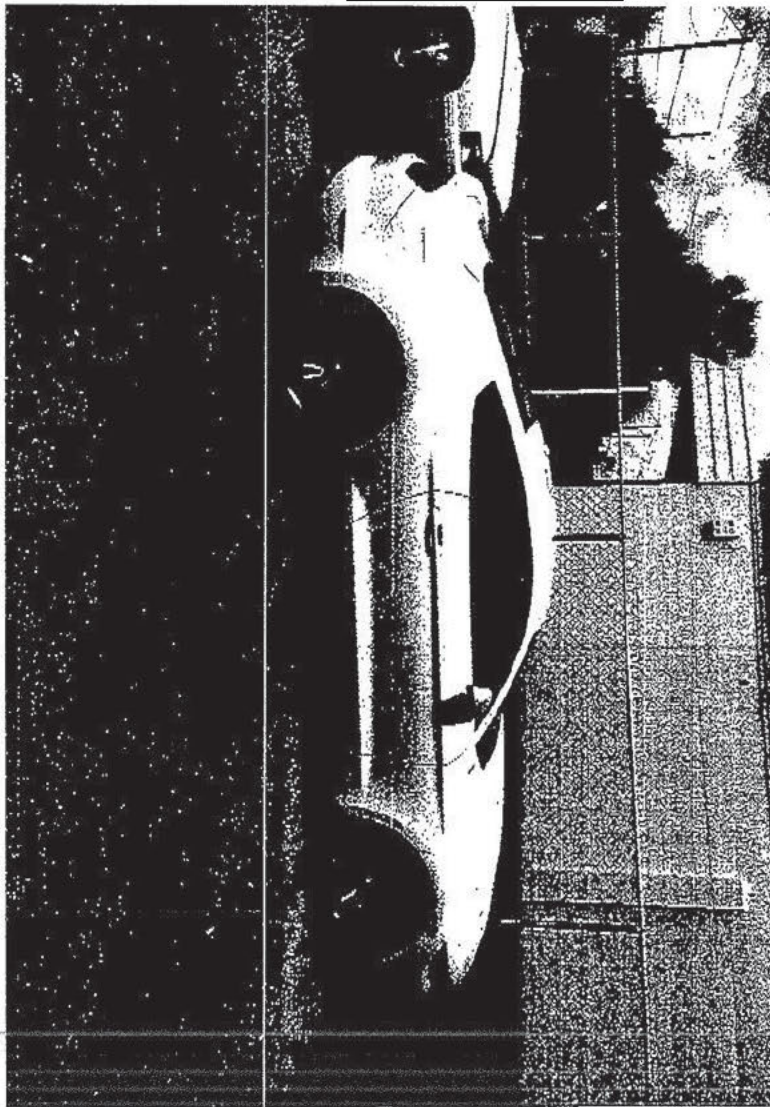
Before



Before



Can not find front headlight
Portion of damage Refer to
Repair



After

CERTIFICATE OF TITLE

Year: 2015 Make: FORD Body: 2D VIN: 1F332 [REDACTED] Title: [REDACTED]
 State: NHZ Primary Brand: Secondary Brand: [REDACTED] Title: [REDACTED]
 Title: [REDACTED] Private: [REDACTED] Title: [REDACTED]
 Date of Issue: 02/09/2015 Date: [REDACTED]

Registered Owner

JACKSONVILLE, FL

1st Lienholder

ELECTRONIC TITLE PRIOR TO 08/01/2016

DISENCE MOTORIST SERVICES

TALLAHASSEE

FLORIDA

DEPARTMENT OF HIGHWAY SAFETY AND MOTOR VEHICLES

Robert R. Kynock
Director

Control Number

2-16

Terry L. Rucker
Executive Director

TRANSFER OF TITLE BY SELLER (This section must be completed at the time of sale.)

Federal and/or state law require that this seller state the vehicle's purchase price, selling price and date sold in connection with the transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

This title is warranted to be free from any liens except as noted on the front of the certificate and the motor vehicle or vessel described is hereby transferred to:

Seller Must Enter Purchaser's Name

Address

Seller Must Enter Selling Price

Seller Must Enter Date Sold

PAV state that this ☐ is or ☐ is a digit odometer now reads ☐ 1 ☐ 2 ☐ 3 (in tenths) miles, date read ☐ and I hereby certify that to the best of my knowledge the odometer reading is correct.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THAT THE FACTS STATED IN IT ARE TRUE.

SELLER Must

CO-SELLER Must

Sign Here

Sign Here

Print Here

Print Here

Selling Dealer's License Number

Tax No.

Tax Collector

Antique Name

License Number

PURCHASER Must

CO-PURCHASER Must

Sign Here

Sign Here

Print Here

Print Here

NOTICE: PENALTY IS REQUIRED BY LAW IF NOT SUBMITTED FOR TRANSFER WITHIN 30 DAYS AFTER DATE OF PURCHASE.

OSCAR'S BODY & PAINTING INC.

2549 W. BEAVER ST. JACKSONVILLE, FL 32254

(904) 338-0852 (904) 337-0885

MV-39827 FAX (904) 338-2693

o.s.c.a.r.p.a.i.n.t.a.n.d.b.o.d.y@gmail.com

YR. MAKE MODEL EST. TIME
2015 Ford Mustang 8/22/16

NAME	DATE IN	PROPOSED OUT	TRIM	COLOR
ADDRESS	LICENSE NO.	ODOMETER	DATE OF LOSS	CLAIM NO.
CITY	INS. CO.	FILE NO.	ADJUSTER PHONE DEDUCTIBLE WRITTEN BY	
STATE	CHECK ONE: ☐ ESTIMATE ☐ INVOICE ☐ IN ☐ OUT			

REPAIR PLACE	RD = REDUCED PRICE - WARR.	DETAILS OF REPAIR	NC = NO CHARGE - WARR.	LINE NO.	PARTS	LABOR	PAINT	SUBLET/MISC.
✓ Lower rocker panel (Rt side)				1	420.20	0.9	1.0	
✓ Lower Plastic molding				2				
✓ Rt Door				3				
✓ Ft Bumper Cover				4				
✓ Rt Ft & Fender				5	1,170.00	5.8	2.1	
✓ Lt Headlamp				6				
				7		1.0	3.5	
				8		0.5	2.2	
				9	1,300.00	0.4		
				10				
				11				
				12				
				13				
				14				
				15				
				16				
				17				

CUSTOMER COMPLAINT/PROBLEM: 2-DOOR 4-DOOR

month/ mile warranty
on all parts and labor unless otherwise specified.

IF REPAIR COMMENCEMENT IS AUTHORIZED BUT COMPLETION IS NOT AUTHORIZED, A CHARGE WILL BE IMPOSED FOR DISASSEMBLY, REASSEMBLY OR PARTIALLY COMPLETED WORK.

PLEASE READ CAREFULLY, CHECK ONE OF THE STATEMENTS BELOW, AND SIGN:

I UNDERSTAND THAT, UNDER STATE LAW I AM ENTITLED TO A WRITTEN ESTIMATE

IF MY FINAL BILL WILL EXCEED \$100.

☐ I REQUEST A WRITTEN ESTIMATE.

☐ I DO NOT REQUEST A WRITTEN ESTIMATE AS LONG AS THE REPAIR COSTS DO NOT EXCEED \$

THE SHOP MAY NOT EXCEED THIS AMOUNT WITHOUT MY WRITTEN OR ORAL APPROVAL.

☐ I DO NOT REQUEST A WRITTEN ESTIMATE.

SIGNED

DATE / /

TECH. SIGNATURE

CERT. #

TECH. SIGNATURE

CERT. #

* THIS CHARGE REPRESENTS COSTS AND PROFITS TO THE MOTOR VEHICLE REPAIR FACILITY FOR MISCELLANEOUS SHOP SUPPLIES OR WASTE DISPOSAL. *** FS403.718 MANDATES A \$1.00 FEE FOR EACH NEW TIRE SOLD IN THE STATE OF FLORIDA. **** FS403.718 MANDATES A \$1.50 FEE FOR EACH NEW OR REMANUFACTURED BATTERY SOLD IN THE STATE OF FLORIDA.

* BATTERY DISPOSAL (FS403.718)

* TIRE DISPOSAL (FS403.718)

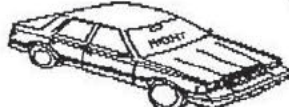


- PRIOR DAMAGE -



Areas marked by an "X" represent prior damage and are not included in this estimate.

- CURRENT ESTIMATE -



TOTALS

FLAT RATE
HOURLY RATE
BOTH ABOVE

PER ABOVE
CHARGE FOR ESTIMATING

CHARGE FOR DISASSEMBLY AND/OR REASSEMBLY

WE CANNOT REASSEMBLE

CASH OR C.O.D.

YES

NO

RETURN REPLACED PARTS?

CIRCLE ONE

ESTIMATE GOOD FOR 90 DAYS. I hereby authorize the above repair work to be done along with the necessary material, and hereby grant you and/or your employees permission to operate the vehicle herein described for the purpose of testing and/or inspection. If there is a dispute over the final bill, the customer may bond the amount with your local clerk of the court, per FS 559.317. Failure to bond/pay the bill, may lead to implementation of FS 719.585; non law. Repair shop will not be held responsible for loss or damage to the vehicle or articles left in vehicle in case of fire, theft, or any other cause beyond your control. If it becomes necessary for you to employ a collecting agency and/or an attorney to collect this account, I the undersigned agree to pay all court costs plus a reasonable attorney's fee.

ESTIMATED COST OF REPAIRS
REVISED ESTIMATE
DAILY CHARGE FOR STORAGE AFTER 3 WORKING DAYS AFTER CUSTOMER NOTIFIED

PAINT HRS. @ \$ 369.60

LABOR HRS. @ \$ 361.20

PARTS % 2,890.20

PAINT/SUPPLIES * 255.78

ENVIRONMENTAL * CHARGES 520.00

TOWING/STORAGE

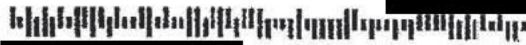
SUBLET

SUB-TOTAL 3896.78

TAX 272.77

TOTAL \$ 4,169.55

Ford Motor Company
Ford Customer Service Division
P. O. Box 1904
Dearborn, Michigan 48121-1904



JACKSONVILLE, FL

October 2016

***** IMPORTANT SAFETY RECALL *****
(PROGRAMA DE SEGURIDAD IMPORTANTE)

Safety Recall Notice 16S30 / NHTSA Recall 16V-643
Aviso de Revisión de Seguridad 16S30

2015 Mustang

Your Vehicle Identification Number (VIN): 1FA6P8TH2F5

This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act.

Ford Motor Company has decided that a defect which relates to motor vehicle safety exists in your vehicle, with the VIN shown above.

We apologize for this situation and want to assure you that, with your assistance, we will correct this condition. Our commitment, together with your dealer, is to provide you with the highest level of service and support.

What is the issue?

In your vehicle, a side door latch may break, which may make the door difficult to latch. A door that opens while driving increases the risk of injury. Parts are not currently available to repair all vehicles.

What should you do?

If your vehicle exhibits symptoms related to side door latching, immediately contact your dealer and request a service appointment for diagnosis and repair relating to Safety Recall 16S30. Provide the dealer with the VIN of your vehicle, which is printed near your name at the beginning of this letter.

If your vehicle does not exhibit these symptoms, Ford will notify you by mail when service parts are available, at which time a service appointment to perform this safety recall may be scheduled.

Please note: Federal law requires that any vehicle lessor receiving this recall notice must forward a copy of this notice to the lessee within ten days.

What will Ford and your dealer do?

When parts are available for Safety Recall 16S30, you will be notified by Ford Motor Company via mail to schedule a service appointment with your dealer to replace your vehicle's side door latches. Parts for 16S30 are anticipated to be available to begin repairing vehicles in the second quarter 2017.

Repairs will be completed free of charge (parts and labor).

Quick Lane™

TIRE & AUTO CENTER

at Paul Clark Ford

4046 State Rd 200 - Yulee, FL 32097

(904) 225-3684 Fax: (904) 491-8966

SERVICE DEPARTMENT HOURS

7:00 a.m. to 7:00 p.m.

Monday - Friday

8:00 a.m. to 4:00 p.m. Saturday

RO Open Date	RO Number
11/16/16	
RO Close Date	Status
11/19/16	Final
mileage in	mileage out
19543	19543
Service Advisor Tag #	
MIKE TAYLOR/161*W*	
Vehicle Registration Number	
1FA6P8TH2F5	
Service Date	In-Service Date
1/14/15	1/14/15
Color	License Number
OXFORD WHI	

JACKSONVILLE, FL

Year	Make	Model	Body	Color	License Number
2015	FORD	MUSTANG	2DR FASTBACK ECOB	OXFORD WHI	
15074					

DESCRIPTION OF SERVICE AND PARTS

* WE HOPE YOU "LOVE" DOING BUSINESS WITH US. *

* HAVE A GREAT DAY ! *

TERMS: STRICTLY CASH UNLESS ARRANGEMENTS ARE MADE. I hereby authorize the repair work hereinafter to be done along with the necessary material and agree that you are not responsible for loss or damage to vehicle or articles left in the vehicle in case of fire, theft, or any other cause beyond your control or for any delays caused by unavailability of parts or delays in parts shipments by the supplier or transporter. I hereby grant you or your employees permission to operate the vehicle herein described on streets, highways, or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above vehicle to secure the amount of repairs thereto."

DISCLAIMER OF WARRANTIES. Any warranties on the products sold hereby are those made by the manufacturer. The seller hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose, and the seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of said products. Any limitation contained herein does not apply where prohibited by law.

LABOR	22.00
PARTS	20.55
DEDUCTIBLE	.00
SUBLET	.00
SHOP SUPPLIES	1.54
HAZARDOUS MATERIALS	.00
SALES TAX OR TAX I.D.	3.09
SPECIAL ORDER DEPOSIT	.00
DISCOUNTS	.00
TOTAL DUE	47.18
Cash	47.18

NO RETURN ON ELECTRICAL OR SAFETY ITEMS OR SPECIAL ORDERS.

X



Office of the General Counsel

Ford Motor Company
Claims Department
P.O. Box 70
Dearborn, Michigan 48121-0070

[REDACTED]
Jacksonville, FL 32207

October 21, 2016

RE: - 2015 Ford Mustang
VIN: 1FA6P8TH2F5 [REDACTED]

Dear [REDACTED]

We are writing to update you on the status of your claim. Based on the initial information provided, we have determined that a physical inspection of the vehicle is necessary to more accurately understand the incident. This inspection can be done at **Paul Clark Ford, Yulee, FL**.

Please contact **Paul Clark Ford, Yulee, FL** to schedule an appointment. Once scheduled, please have the Service Manager contact me at [REDACTED]

Please let me know if you are unable to send the vehicle for an inspection at **Paul Clark Ford, Yulee, FL**. If you no longer own the vehicle, Ford is unable to proceed with the investigation.

Thank you for your prompt attention to this matter as Ford continues its investigation of your claim.

Sincerely,

[REDACTED]
Alfna Taylor
Legal Analyst- OGC Product Claims
Email: ataylor23@ford.com
Phone: [REDACTED]
Fax: 888 683-8898

- 2 -

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,


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

Taylor, Alma (A.)

From: Taylor, Alma (A.)
Sent: Monday, December 05, 2016 10:13 AM
To: [REDACTED]
Subject: RE: [REDACTED]/2015 Mustang/VIN:1FA6P8TH2F5 [REDACTED]

Thank you.

Alma Taylor
Legal Analyst
Office of the General Counsel- Product Claims
Phone: [REDACTED]
Fax: 888 683-9898

PRIVILEGED AND CONFIDENTIAL

This email contains privileged and confidential communications.
If you received it in error, please delete it immediately and notify the sender.

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

From: [REDACTED] [mailto:ted\[REDACTED\]](mailto:ted[REDACTED])
Sent: Monday, December 05, 2016 8:21 AM
To: Taylor, Alma (A.)
Subject: [REDACTED]/2015 Mustang/VIN:1FA6P8TH2F5 [REDACTED]

Mrs. Taylor , I'm sorry about the confusion on the email address, it was a oversight on my behalf.
But here are the photos of damages.
Please feel free to contact me if you need any further information.
Sincerely

[REDACTED]
[REDACTED]
Jacksonville, Florida. [REDACTED]
[REDACTED]



Ford

Fax 888-683-9898

ATTN: Alma Taylor

15 pages

Reimbursement Request
Due to Damaged From
Recall

Jax Fl.

11-30-16
Returned
phone call via
text - photo will

RE: 2015 Ford Mustang
VIN: 1FA6P8TH2F5



Office of the General Counsel

Ford Motor Company
Product Claims Department
P.O. Box 70
Dearborn, Michigan 48121-0070[REDACTED]
Jacksonville, FL [REDACTED]

October 21, 2016

RE: 2015 Ford Mustang

VIN: 1FA6P8TH2F5 [REDACTED]

Dear [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:

1. What vehicle part or parts is the subject of the claim?

Yes

- a. Has that part been repaired or replaced since the time of the incident?

(circle one) Yes or No

2. At the time of the incident:

- a. What was the vehicle mileage?
- 19K2

- b. Was the vehicle engine running? (circle one)
- Yes
- or No

- c. Were the keys in the ignition of the vehicle? (circle one) Yes or
- No
- Push Button

3. List any after-market items installed on the vehicle (for example, alarms, remote starters or lift kits):

N/A

4. Where is your vehicle currently located?

Jacksonville FL

5. What resolution are you seeking from Ford Motor Company?

Reimbursement See Attached

Did not place a claim with insurance. Paid out of pocket. Thank God we were able to do that our Rates would have skyrocketed.

