

PRIORITY® **FLAT RATE ENVELOPE**
★ MAIL ★
ONE RATE ★ ANY WEIGHT*

MAIL POSTAGE HERE



1006



92619

U.S. POSTAGE PAID
PM 2-Day
SAINT PETERSBURG, FL
33701
JAN 14, 21
AMOUNT

\$7.75

R2305H128584-06

EXPECTED DELIVERY DAY: 01/19/21

USPS TRACKING® NUMBER



9505 5141 6243 1014 4055 69



* For international shipments, the maximum weight is 4 lbs.

EP14H July 2013 Outer Dimension: 10 x 5

[REDACTED]

PIPAS LAW GROUP

January 13, 2021

Sent via U.S. Mail

Kia

PO Box 52410

Irvine, CA 92619

Re: Our Client: [REDACTED]
Your Insured: Kia
Claim No.: [REDACTED]
Date of Loss: 12/20/2020

Dear Sir or Madam:

Our law firm now represents [REDACTED] in a claim for injuries arising out of the use of your product that occurred on December [REDACTED] 2020. Our client was using the "Smart Cruise Control with Stop and Go" feature, hereinafter, "Control" in his 2021 Kia K5 GT. Upon using the Control, [REDACTED] vehicle sped up instead of stopping, causing him to go fifty (50) feet into the air and coming to a final rest in a construction zone. [REDACTED] received injuries over his entire body. He received treatment at Dade City Chiropractic and NeuSpine Institute.

[REDACTED] sustained serious injuries from this product. We are reaching out to set up a claim and to further investigate this product. Please provide the following:

1. Any adjuster and insurance information;
2. Any parties in the chain of distribution;
3. Manufacturer contact information;
4. Any reports on other incidents involving this product.

I would appreciate your assistance in providing the above requested information as expeditiously as possible.

Sincerely,

[REDACTED]

Kevin L. Sullivan II, Esquire

FLORIDA TRAFFIC CRASH REPORT

LONG FORM SHORT FORM UPDATE

HIGHWAY SAFETY & MOTOR VEHICLES,
TRAFFIC CRASH RECORDS
EIL KIRKMAN BUILDING, TALLAHASSEE, FL 32399-0537

(Electronic Version)

Date of Crash 12/Dec/2020 08:33 PM	Time of Crash 12/Dec/2020 08:33 PM	Date of Report 12/Dec/2020 09:05 PM	Invest. Agency Report Number [REDACTED]	HSMV Crash Report Number [REDACTED]
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CRASH IDENTIFIERS

County Code 28	City Code 0	County of Crash PASCO	Place or City of Crash UNINCORPORATED	Within City Limits No	Time Reported 12/Dec/2020 08:33 PM	Time Dispatched 12/Dec/2020 08:43 PM
Time on Scene 12/Dec/2020 08:52 PM	Time Cleared Scene 12/Dec/2020 09:43 PM	Completed Yes	Reason (if Investigation NOT Completed)			Notified By Law Enforcement

ROADWAY INFORMATION

Crash Occured On Street, Road, Highway CR-52 ALT [REDACTED]			1 At Street Address#	2 At Latitude [REDACTED]	and Longitude [REDACTED]
At Feet 10	Or Miles	Direction West	3 From Intersection With Street, Road, Highway CR-579 [REDACTED]	4 Or From Milepost #	
Road System Identifier 4 County		Type Of Shoulder 2 Unpaved		Type Of Intersection 3 T-Intersection	

CRASH INFORMATION (Check if Pictures Taken)

Light Condition 5 Dark-Not Lighted	Weather Condition 1 Clear	Roadway Surface Condition 1 Dry	School Bus Related 1 No	Manner Of Collision 77 Other, Explain in Narrative
First Harmful Event Type	First Harmful Event 34	First Harmful Event Location 2 Off Roadway	Within Interchange No	First Harmful Event Relation to Junction 3 Intersection.Related
Contributing Circumstances: Road 1 None		Contributing Circumstances: Road		Contributing Circumstances: Road
Contributing Circumstances: Environment 1 None		Contributing Circumstances: Environment		Contributing Circumstances: Environment
Work Zone Related 1 No	Crash In Work Zone	Type Of Work Zone	Workers In Work Zone	Law Enforcement In Work Zone

VEHICLE (Check if Commercial)

Vehicle 1	Motor Vehicle Type 1 Vehicle in Transport	Hit and Run 1 No	Veh License Number [REDACTED]	State FL	Reg. Expires 12/Jul/2021	Permanent Reg. No	VIN 5XXG64J27MC[REDACTED]			
Year 2021	Make KIA	Model K5 GT	Style 4D	Color GRY	Extent of Damage Disabling	Est. Damage 10000	Towed Due To Damage Yes	Vehicle Removed By ATLAS TOWING	Rotation Rotation	
Insurance Company PROGRESSIVE					Insurance Policy Number 944769360					
Name of Vehicle Owner (Check Box If Business) <input type="checkbox"/>			Current Address (Number and Street) [REDACTED]			City and State LAKELAND FL		Zip Code [REDACTED]		
Trailer One:	License Number	State	Reg. Expires	Permanent Reg.	VIN	Year	Make	Length	Axles	
Trailer Two:	License Number	State	Reg. Expires	Permanent Reg.	VIN	Year	Make	Length	Axles	
Vehicle Traveling:	Direction West	On Street, Road, Highway CR-52 ALT [REDACTED]				At Est. Speed 45	Posted Speed 45	Total Lanes 2		
CMV Configuration			Cargo Body Type			Area of Initial Impact		Most Damaged Area		
Comm GVWR/GCWR			Trailer Type (trailer one)		Trailer Type (trailer two)					
Haz. Mat. Release	Haz Mat. Placard	Number		Class						
Motor Carrier Name				US DOT Number						
Motor Carrier Address				City and State				Zip Code		Phone Number

Comm/Non-Commercial	Vehicle Body Type 1 Passenger Car	Vehicle Defects (one) 1 None	Vehicle Defects (two)	Emergency Vehicle Use 1 No	Special Function of MV 1 No Special Function
Vehicle Maneuver Action 1 Straight Ahead	Trafficway 1 Two-Way, Not Divided	Roadway Grade 1 Level	Roadway Alignment 1 Straight	Most Harmful Event 3 Collision with Fixed Object	Most Harmful Event Detail 34 Traffic Sign Support
Traffic Control Device For This Vehicle 6 Stop Sign	First (1) Sequence of Events 3 Collision with Fixed Object 34 Traffic Sign Support	Second (2) Sequence of Events	Third (3) Sequence of Events	Fourth (4) Sequence of Events	

PERSON RECORD

Person# 1	Description 1 Driver	Vehicle # 1	Name [REDACTED]	Date of Birth [REDACTED]	Sex 1 Male	Phone Number [REDACTED]	Re-Exam No
Address [REDACTED]		City LAKELAND	State FL		Zip Code [REDACTED]		
Driver License Number [REDACTED]	State FL	Expires 02/Sep/2026	DL Type 5 E/Operator	Req. End. 3 No Req Endorsement	Injury Severity 1 None	Ejection 1 Not Ejected	

Date of Crash 12/Dec/2020 08:33 PM	Date of Report 12/Dec/2020 08:33 PM	Invest. Agency Report Number [REDACTED]	HSMV Crash Report Number [REDACTED]
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Restraint System 3 Shoulder and Lap Belt Used	Air Bag Deployed 6 Deployed-Combination	Helmet Use	Eye Protection 3 Not Applicable	Seating Location Seat 1 Left	Seating Location Row 1 Front	Seating Location Other 1 Not Applicable		
Drivers Actions at Time of Crash (first) 13 Ran Stop Sign		Drivers Actions at Time of Crash (second)		Driver Distracted By 7 Inattentive	Vision Obstruction 1 Vision Not Obscured			
Drivers Actions at Time of Crash (third)		Drivers Actions at Time of Crash (fourth)		Drivers Condition at Time of Crash 1 Apparently Normal				
Suspected Alcohol Use 1 No	Alcohol Tested 1 Test Not Given	Alcohol Test Type	Alcohol Test Result	BAC	Suspected Drug Use 1 No	Drug Tested 1 Test Not Given	Drug Test Type	Drug Test Result
Source of Transport to Medical Facility 1 Not Transported		EMS Agency Name or ID		EMS Run Number		Medical Facility Transported To		

VIOLATIONS

Person#	Name	Florida Statute Number	Charge	Citation
1	[REDACTED]	316.123(2)(a)	RAN STOP SIGN	ACTMYIE

NON VEHICLE PROPERTY DAMAGE

Vehicle#	Person#	Property Damage - Other Than Vehicle	Est. Amount	Business	Owner's Name	Address	City & State	Zip Code
		DIRECTIONAL SIGN	1000	Yes	PASCO ROAD AND BRIDGE	8700 CITIZEN DR	NEW PORT RICHEY FL	34654

NARRATIVE

D Number Rank Name Troop / Post Officer Agency Phone Number Date Created
4741 TPR ROBERTS, JORDAN LAMAC FLORIDA HIGHWAY PATROL 352-251-4020 Dec 27, 2020

Vehicle 1 was traveling west on CR-52 ALT ([REDACTED]) approaching CR-579 ([REDACTED]).

Driver 1 failed to stop at the stop sign at [REDACTED] and [REDACTED]. As a result, Vehicle 1 traveled through the intersection and struck a traffic sign post. Vehicle 1 continued traveling west coming to final rest facing west.


Upon Trooper's arrival, Vehicle 1 remained at final rest.

Driver 1 was cited for failing to stop a stop sign.

REPORTING OFFICER

ID/Badge #	Rank and Name	Department	Type of Department
4741	TPR ROBERTS, JORDAN LAMA	FLORIDA HIGHWAY PATROL	FHP

North and Southbound Lanes of CR-575


NOT TO SCALE
12FT LANES
AOC = AREA OF COLLISION

V01 Final Rest



AOC Between V01 & Traffic Sign Post



East and Westbound Lanes of CR-52 ALT ([redacted])



V01 Failing to Stop at Stop Sign

Vehicle 1 (V01)





LOADING INFORMATION
LES PNEUS ET LE CHARGEMENT

1	FRONT	2	REAR
	AVANT		ARRIERE

Do not exceed 410 kg or 904 lbs.
 ne dépasser pas 410 kg ou 904 lbs.

SEE OWNER'S MANUAL FOR ADDITIONAL INFORMATION
 LE MANUEL L'USAGER POUR PLUS DE RENSEIGNEMENTS

3500

MANUFACTURED BY
KIA KIA MOTORS MANUFACTURING GEORGIA, INC.
 OCT/27/20 GVWR 4497 lbs PAINT C7S
 GAWR FRONT 2513 lbs GAWR REAR 2315 lbs TRIM WK
 THIS VEHICLE CONFORMS TO ALL APPLICABLE U.S.A. FEDERAL MOTOR VEHICLE SAFETY, BUMPER, AND THEFT PREVENTION STANDARDS IN EFFECT ON THE DATE OF MANUFACTURE SHOWN ABOVE.
 V.I.N. 5XXG64J



[REDACTED]









[REDACTED]



[REDACTED]



01/06/2021 - IAA



2021 - IAA

01/06/2021 - IAA

01/06/2021 - IAA



01/06/2021 - IAA

01/06/2021 - IAA

01/06/2021 - IAA

01/06/2021 - IAA

01/06/2021 - IAA

[REDACTED]



01/06/2021 - IAA

01/06/2021 - IAA

01/06/2021 - IAA

