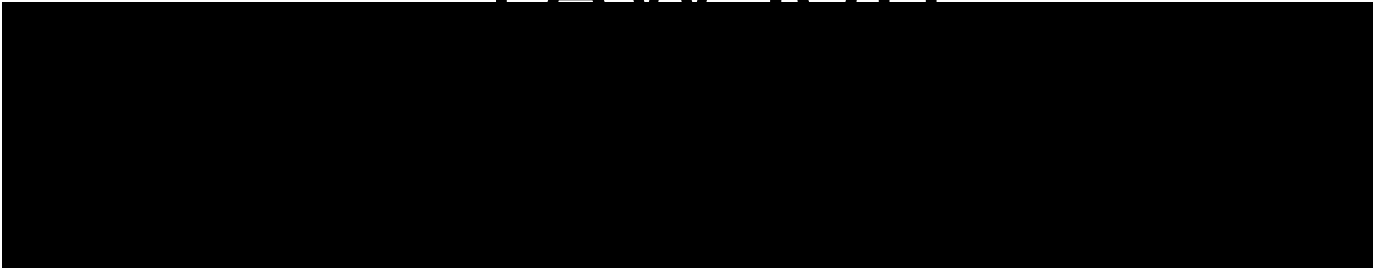


LAW/SUIT



SUBJECT VEHICLES

Service of Process Transmittal Summary

TO: Chuck Morici
FORD MOTOR COMPANY
1 American Rd
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:

[REDACTED] / To: Ford Motor Company

DOCUMENT(S) SERVED: Summons, Complaint, Attachment(s), Notice

COURT/AGENCY: San Joaquin County - Superior Court - Stockton, CA
[REDACTED]

[REDACTED]
PROCESS SERVED ON: C T Corporation System, GLENDALE, CA

DATE/METHOD OF SERVICE: By Process Server on 04/26/2022 at 12:52

JURISDICTION SERVED: California

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

ATTORNEY(S)/SENDER(S): William R. McGee
Law Offices of William R. McGee
701 Palomar Airport Road, Suite 250
Carlsbad, CA 92011
760-438-1047

ACTION ITEMS: CT has retained the current log, Retain Date: 04/27/2022, Expected Purge Date:
05/02/2022

Image SOP

REGISTERED AGENT CONTACT: C T Corporation System
330 N BRAND BLVD
STE 700
GLENDALE, CA 91203
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT

disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

PROCESS SERVER DELIVERY DETAILS

Date: Tue, Apr 26, 2022
Server Name: Jim Sands

Entity Served	FORD MOTOR COMPANY
Case Number	[REDACTED]
Jurisdiction	CA

Inserts		



160189

COPY

SUM-100

SUMMONS (CITACION JUDICIAL) BY FAX

NOTICE TO DEFENDANT: (AVISO AL DEMANDADO): FORD MOTOR COMPANY and DOES 1 through 10, inclusive

COURT CLERK LISA VEUM

YOU ARE BEING SUED BY PLAINTIFF:



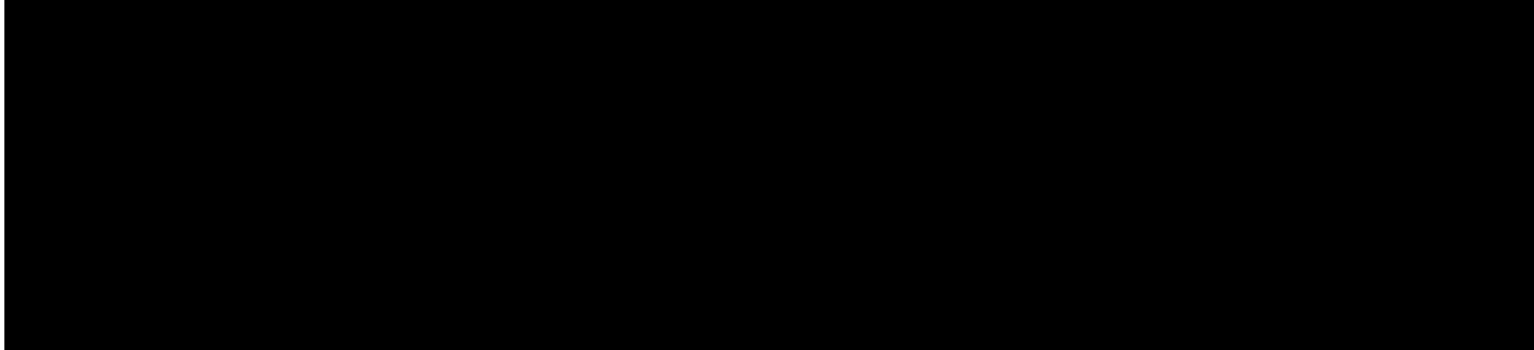
NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

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 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.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito a 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.

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.



(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons. (POS-010)).

[SEAL]

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. [X] on behalf of (specify): Ford Motor Company
under: [X] CCP 416.10 (corporation)
CCP 416.20 (defunct corporation)
CCP 416.40 (association or partnership)
other (specify)
4. by personal delivery on (date):

COPY

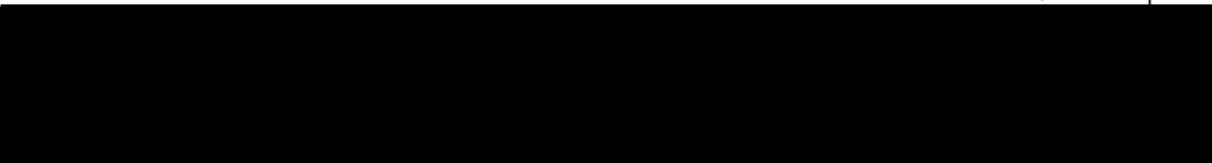
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LAW OFFICES OF WILLIAM R. McGEE
William R. McGee, State Bar No. 122153
LemonAtty@aol.com
Deanna Wallace-Tracy, State Bar No. 242825
DeannaLemonLaw@gmail.com
701 Palomar Airport Rd. Su. 250
Carlsbad, CA 92011
P: (760)438-1047
F: (760)438-1056

2002 APR 18 PM 1:27
TRANSMITTED BY CLERK
LISA VEGA

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN JOAQUIN



v.
FORD MOTOR COMPANY, and DOES 1) through 10, inclusive,
Defendants.

[VIOLATION OF THE SONG-BEVERLY CONSUMER WARRANTY ACT]

BY FAX

Plaintiff,

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 SAN JOAQUIN.
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.
3. Each of the defendants in this case acted as the principal, agent, employee or other authorized representative in relation to the other; all defendants acted at all times

1
2 mentioned in this complaint within the course and scope of their respective authority and
3 with the full knowledge and consent of the other defendants. Furthermore, plaintiff is
4 informed and believes and thereon alleges that all acts of corporate employees as
5 hereinafter alleged were authorized or ratified by an officer, director or managing agent of
6 the corporate employer.

7 4. On or about November 18, 2021, plaintiff purchased a 2021 Ford Bronco,
8 vehicle identification number [REDACTED]

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

12 6. Plaintiff is a "buyer" of a new motor vehicle under the Act.

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

15 8. Defendant FORD MOTOR COMPANY provided plaintiff with an "express
16 warranty" under the Act, pursuant to which the defendant undertook to preserve the utility
17 or performance of the subject vehicle.

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

22 10. The subject vehicle has suffered from nonconformity(s) to warranty to,
23 including but not limited to, failure of its engine and turbo-charger. The foregoing defect(s)
24 and nonconformity(s) to warranty manifested themselves within the applicable express
25 warranty period.

26 11. Plaintiff delivered the aforementioned vehicle to an authorized FORD
27 MOTOR COMPANY service and repair facility for repair of the aforementioned
28 nonconformity(s) on multiple occasions.

1 12. Defendant has been unable and/or has refused to conform plaintiff's vehicle
2 to the applicable express and implied warranties under the Act after a reasonable number
3 of attempts. Furthermore, the aforementioned nonconformity(s) substantially impairs the
4 use, value and/or safety of the subject vehicle to plaintiff.

5 13. Notwithstanding knowledge of plaintiff's entitlement, defendant has
6 intentionally failed to comply with its obligations under the Act to repurchase the vehicle
7 and make restitution.

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

11 15. Plaintiff is entitled to justifiably revoke acceptance of the aforementioned
12 vehicle under the Act.

13 16. Under the Act, plaintiff is entitled to reimbursement of the purchase price paid
14 for the subject vehicle less that amount directly attributable to use by the plaintiff prior to
15 discovery of the nonconformity(s).

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

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

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

24 WHEREFORE, plaintiff prays for judgment against defendant as follows:

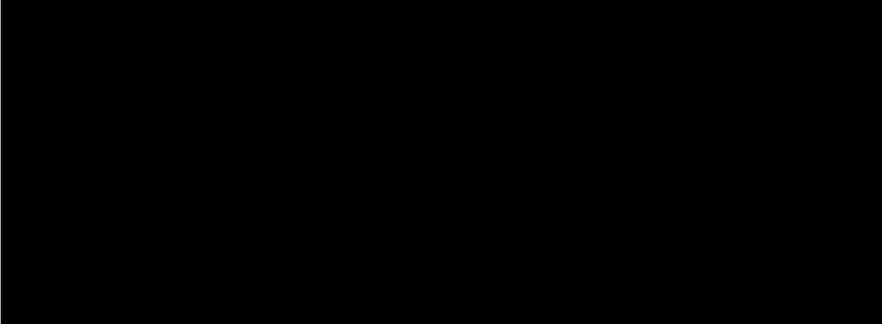
- 25 1. For rescission of the contract and restitution of all consideration;
26 2. For actual compensatory and general damages according to proof at time of
27 trial;
28 3. That such actual, compensatory and general damages be doubled and

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awarded to plaintiff as a civil penalty;

- 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: April 1, 2022



BY

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

Auto Tort Auto (22) Uninsured motorist (46)	Contract <input checked="" type="checkbox"/> Breach of contract/warranty (06) Rule 3.740 collections (09) Other collections (09) Insurance coverage (18) Other contract (37)	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)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Asbestos (04) Product liability (24) Medical malpractice (45) Other PI/PD/WD (23)	Real Property Eminent domain/Inverse condemnation (14) Wrongful eviction (33) Other real property (26)	Enforcement of Judgment Enforcement of judgment (20)
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)	Unlawful Detainer Commercial (31) Residential (32) Drugs (38)	Miscellaneous Civil Complaint RICO (27) Other complaint (<i>not specified above</i>) (42)
Employment Wrongful termination (36) Other employment (15)	Judicial Review Asset forfeiture (05) Petition re: arbitration award (11) Writ of mandate (02) Other judicial review (39)	Miscellaneous Civil Petition Partnership and corporate governance (21) Other petition (<i>not specified above</i>) (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 (VIOLATION OF THE SONG-BEVERLY CONSUMER WARRANTY ACT)
5. This case is is not a class action suit.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

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 San Joaquin
180 E Weber Avenue
Stockton, CA 95202

NOTICE OF CASE ASSIGNMENT AND NOTICE OF HEARING



A Case Management Conference has been scheduled for your case as indicated below. A copy of this information must be provided with the complaint or petition, and with any cross-complaint that names a new party to the underlying action. Disregard hearing date if that date has expired.

Table with 3 columns: Hearing: Case Management Conference, Date: 10/21/2022, Time: 8:45 AM Department:10A; JUDGE, COURT LOCATION, PHONE Numbers; THIS CASE HAS BEEN ASSIGNED TO JUDGE GEORGE J. ABDALLAH IN DEPARTMENT 10A FOR ALL PURPOSES, INCLUDING TRIAL, Stockton, Stockton: 209-992-5693, Lodi: 209-992-5522

[X] ADR & Scheduling Information is available on the court website @ sjcourts.org/self-help

- 1. You must:
a. Serve all named defendant's and file proofs of service on those defendants with the court Within 60 days of filing of the complaint. (CRC 3.110)
b. File and serve a completed Case Management Conference Statement (use of JC form CM-110 is mandatory) at least 15 days before the Case Management Conference.
c. Meet and Confer, in person or by telephone, to consider each of the issues identified in CRC 3.727 no later than 30 calendar days before the date set for the Case Management Conference. (CRC 3.724)
d. Collection cases are managed pursuant to CRC 3.740.
2. Case Management Conferences, Law and Motion and Ex Partes will be held remotely unless ordered otherwise. For telephonic appearance phone numbers, information and instructions visit @ https://www.sjcourts.org/division/civil.
3. If this case was eFiled, the plaintiff/petitioner or their attorney must access their copy of this notice and the issued summons for service from the court's case management system at the following link: cms.sjcourts.org/fullcourtweb/start.do.
4. Courtesy Copies: Courtesy copies must be submitted as outlined in Local Rule 3-117. Courtesy copies (only) may be placed in the drop boxes located on the 10th and 11th floor. Courtesy copies can also be placed in the drop box located outside of the courthouse.

Visit our website @ www.sjcourts.org for more information regarding civil cases, local rules, and forms.

Date: 04/18/2022

Lisa Vega, Deputy Clerk

NOTICE OF CASE ASSIGNMENT AND NOTICE OF HEARING