

MATTER #	[REDACTED]
FILE TYPE	Lawsuit
FILE NAME	[REDACTED]
[REDACTED]	[REDACTED]
DATE OF INCIDENT	[REDACTED]
DATE OF NOTICE	8/9/2018
MODEL/MODEL YEAR	2017 Ram 2500 Laramie Crew Cab 4x4
VIN	3C6UR5FL2H [REDACTED]
MILEAGE	29,654
OWNER	[REDACTED] [REDACTED] Miami Lakes, FL [REDACTED] [REDACTED]
COURT	Miami-Dade County Circuit Court Dade, FL
DOCKET #	[REDACTED]
ALLEGED DEFECT	Electronic Stability Control: Warning Lamp Brakes: Brake-Pedal and Linkage Electrical: ABS, ESC, traction and parking sensor lights Brakes-ABS: Warning Lamp
DESCRIPTION	<p>On 8/9/2018 FCA US contacted the dealer about the owner's transmission concerns. The technician informed FCA US the owner's concerns also included the ABS, ESC and parking sensor lights being on.</p> <p>A review of available dealer records show on 08/07/2018 at 29,654 miles, the vehicle was brought to the dealer with complaints that the ABS and ESC lights come on. The dealer found code C0037-62 (Left Rear Wheel Speed Sensor Erratic) and repaired ABS Left Rear Wheel Speed sensor.</p> <p>On 02/13/2019 at 42,186 miles, the vehicle was brought to the dealer with transmission complaints and the dealer also performed CSN U53 which involved reprogramming the Occupant Restraint Controller (ORC) Module and initialization of the ORC and ABS modules.</p> <p>On 06/03/2019 at 47,393 miles, the vehicle was brought to the dealer with complaints that the ABS and traction lights came on, the brake pedal went down while at a stop light, the vehicle was pushing forward, and the brake pedal got hard while trying to brake at highway speed. The dealer found intermittent no communication with</p>

	<p>ABS Control Module, replaced the ABS Module, and performed initialization of the ABS control module.</p> <p>On 06/10/2019 at 47,703 miles, the vehicle was brought to the dealer with complaints that the ABS and Traction lights came on and while stopping at a light the brake pedal got soft and vehicle jumped forward. The dealer found Code C0037-62 (Left Rear Speed Sensor out of Range) and replaced the left rear wheel speed-ABS sensor.</p> <p>On 07/08/2019 at 49,030 miles, the vehicle was brought to the dealer with complaints that at times the brake pedal was hard. No problem was found.</p> <p>On 12/31/2019 FCA US was served with the Complaint alleging, among other things, defective brakes.</p>
CRASH	No
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	FCA US did not inspect the subject vehicle.

MATTER #	[REDACTED]
FILE TYPE	Pre-Litigation Claim
FILE NAME	[REDACTED]
CAIR #	[REDACTED]
DATE OF INCIDENT	6/24/2019
DATE OF NOTICE	7/29/2019
MODEL/MODEL YEAR	2018 Ram 3500 Longhorn Mega Cab 4x4
VIN	3C63RRNL1[REDACTED]
MILEAGE	42,000
OWNER	[REDACTED] [REDACTED] Ada, OK [REDACTED]
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Brakes: Component-Not Specified: Do Not Hold Vehicle
DESCRIPTION	On 7/29/2019 the owner contacted FCA US stating on 6/24/2019 he was in an accident; he struck the rear of the stopped vehicle in front of him because the ABS system did not work. He stated he was driving in slight rain and pulling a heavy loaded trailer (14,000 lb. trailer), he entered a road construction zone and came upon a one-lane bridge. Two vehicles in front of him slammed on their brakes, but the owner alleges his vehicle started sliding and the ABS never engaged. He struck the vehicles in front of him, the air bags did not deploy, and the ABS did not work. The police accident report did not indicate any vehicle defects contributing to the accident but noted driver inattention as a contributing factor. No injuries were reported.
CRASH	Yes
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	FCA US's vehicle inspection ^[1] revealed that the subject vehicle had been repaired prior to the inspection. No EDR data was downloaded due to a communication issue with the SRS module. The inspection test drive verified that the ABS operated as designed. A review of available dealer records showed no history of repairs to the ABS or HCU module.

^[1] The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	[REDACTED]
FILE TYPE	Non-Binding Arbitration
FILE NAME	[REDACTED]
CAIR #	[REDACTED]
DATE OF INCIDENT	2/12/2019
DATE OF NOTICE	4/29/2019
MODEL/MODEL YEAR	2018 Ram 2500 St Crew Cab 4x4
VIN	3C6UR5HL6JG [REDACTED]
MILEAGE	18,403
OWNER	[REDACTED] Farmville, VA [REDACTED]
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Brakes: Component-Not Specified
DESCRIPTION	On 4/29/2019 The owner contacted FCA US stating there was a reoccurring issue with the brake pedal going to the floor. The owner reported the brake will work but there was something wrong with it and the dealer had found no problems. FCA US received the arbitration notice on 5/22/2019 alleging, among other things, that the brake pedal would go to the floor on an incline.
CRASH	No
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	<p>FCA US did not inspect the subject vehicle.</p> <p>A review of the available dealer records showed on 2/12/2019 at 18,403 miles, the vehicle was brought to the dealer with complaints that, when parked on an incline and shifting into reverse, the brake pedal will travel close to the floor before stopping. The dealer inspected the brake system but found no problems, and no stored or active ABS System related DTCs. The dealer also found that while the vehicle was parked on an incline the brake pedal traveled within spec range and that the brake pedal did not travel the same when the parking brake was on.</p> <p>On 2/20/2019 at 19,015 miles, the vehicle was brought to the dealer with complaints that the brake pedal would go to the floor when braking. The dealer verified the customer's concern by parking on a steep hill and moving the gear selector to Reverse or Drive. The dealer found that the brake pedal fell down to the maximum point as Hill</p>

Assist engaged and held the subject vehicle from rolling. An inspection of the brake system found no leaks or related brake system DTCs. However, the Hydro Boost system was only able to get one assisted brake application after the vehicle sat for 1 hour, and the hydro booster was replaced.

On 5/03/2019 at 22,699 miles, the vehicle was brought to the dealer with complaints that brake pedal goes all the way down. The dealer found that the HCU needed to be replaced and ordered the HCU, which arrived on 5/07/2019, but the owner did not make an appointment for part install prior to the Non-Binding Arbitration on 5/25/2019.

MATTER #	██████████
FILE TYPE	Pre-Litigation Claim
FILE NAME	Lopez (Ernest)
CAIR #	██████████
DATE OF INCIDENT	11/24/2019
DATE OF NOTICE	12/24/2019
MODEL/MODEL YEAR	2018 Ram 3500 Laramie Crew Cab 4x4
VIN	3C63R3EL7JG ██████████
MILEAGE	57,000
OWNER	██████████ Patterson, CA ██████████
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Brakes-ABS:ABS/TC/Control Module:Do Not Hold Vehicle
DESCRIPTION	On 12/24/2019 the owner contacted FCA US stating that on 11/24/2019 he was driving about 65 MPH when the traffic ahead stopped, he applied his brakes but the ABS did not engage and he slid to the left. He tried to correct the slide but could not and hit the "K" rail. He did not see any dash warning lights or any messages. The owner sustained a whiplash injury.
CRASH	Yes
PROPERTY DAMAGE	Yes
INJURIES	1
FATALITIES	0
ANALYSIS	FCA US's vehicle inspection ¹ revealed the brakes had adequate friction material but the tires tread depth ranges from 1/32 to 3/32. The dash warning lights were operating properly. EDR data was collected but found no DTCs. The driver floor mat was installed backwards and was not retained on the retaining hooks but, at the time of inspection, the floor mat was not interfering with the pedals. The engine would not start. The brake pedal set firmly and did not drop with pressure held on it for over one minute. Based upon the facts known to date, there is no indication that this incident was the result of a design or manufacturing defect in the subject vehicle.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	██████████
FILE TYPE	Pre-Litigation Claim
FILE NAME	██████████
CAIR #	██████████
DATE OF INCIDENT	2/19/2021
DATE OF NOTICE	2/19/2021
MODEL/MODEL YEAR	2017 Ram 3500 Laramie Crew Cab 4x4
VIN	3C63R3EL1H ██████████
MILEAGE	28,696
OWNER	██████████ Wasilla, AK ██████████
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Brakes-ABS:Component-Not Specified:Do Not Hold Vehicle
DESCRIPTION	On 2/19/2021 the owner contacted FCA US stating he was towing a 40' fifth-wheel that weighed between 13,000 and 15,000 pounds. He was traveling down a slight grade in icy conditions when he applied the brakes. He stated the brakes locked up because his ABS was not functioning and he struck a wall which caused the fifth-wheel to roll over, braking the fifth-wheel hitch and damaging his truck in the process. There were no injuries but the fifth-wheel trailer was totaled. The owner stated the ABS and Stabilitrak lights had been flickering on and off and then stayed illuminated when the temperature got below freezing.
CRASH	Yes
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	FCA US's vehicle inspection ¹ revealed tire tread depths were between 2/32 and 6/32. EDR data was collected but did not assist in the analysis of the alleged defect. The ABS system DRB showed code C0020-01. A review of repair orders showed the ABS module and HCU were replaced on 5/5/2021, after the accident.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	██████████
FILE TYPE	Claim
FILE NAME	████████████████████
CAIR #	██████████
DATE OF INCIDENT	1/23/2020
DATE OF NOTICE	2/12/2020
MODEL/MODEL YEAR	2018 Ram 2500 Laramie Crew Cab 4x4
VIN	3C6UR5FL9J██████████
MILEAGE	8,695
OWNER	Jim Watson Beardstown, IL 6261817631
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Total Vehicle: Component-Not Specified
DESCRIPTION	<p>On 2/12/2020 the owner contacted FCA US seeking an ETA on parts because the truck had the ABS light on and the service electronic braking system message but that the dealer was waiting on a replacement ABS module and pump.</p> <p>A review of available dealer records show on 01/23/2020 at 8,695 miles, the vehicle was brought to the dealer with complaints that pedal goes to floor only when traction control and ABS lights and electronic stability control lights are on. The technician found Active Code C0020-01 (ABS Pump Motor Control General Failure). The technician also found that Code C0020-01 returned when driving on the highway. An ABS Module and Pump were ordered but parts were on back order. On 02/18/2020 at 9,169 miles, the ABS and HCU were replaced.</p> <p>On 12/20/2020 FCA US received the owner's claim letter alleging, among other thing, brake concerns.</p> <p>On 02/23/2021 at 20,618 miles, the vehicle was brought to the dealer with complaints that the ABS and Traction Control Light comes on when pedal goes to the floor. The technician found no dash lights on. A test drive and brake system inspection found no problems. An FCA Field Technician Advisor inspected and test drove the vehicle and was unable to duplicate the owner's concerns.</p> <p>On 09/09/2021 at 29,540 miles, the vehicle was brought to the dealer with complaints that the ABS indicator was on. The technician found Code C0020-01 and the ABS Hydraulic Control Unit was replaced.</p>
CRASH	No

PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	An FCA Field Technician Advisor inspected and test drove the vehicle and was unable to duplicate the owner's concerns.

MATTER #	██████████
FILE TYPE	Lawsuit
FILE NAME	████████████████████
CAIR #	N/A
DATE OF INCIDENT	3/16/2019
DATE OF NOTICE	4/2/2020
MODEL/MODEL YEAR	2017 Ram 2500 Power Wagon Crew Cab
VIN	3C6TR5EJ0H ██████████
MILEAGE	3,983
OWNER	██████████ Sells, AZ ██████████
COURT	Superior Court, Los Angeles, CA
DOCKET #	██████████
ALLEGED DEFECT	Total Vehicle, Component-Not Specified
DESCRIPTION	<p>On 4/2/2020 FCA US received the owner's claim letter alleging, among other thing, brake concerns. A review of available dealer records showed on 3/16/2019 at 3,983 miles, the vehicle was brought to the dealer with complaints that at times when coming to a stop excessive effort was needed to depress the brake pedal and the vehicle will not stop right away. The technician inspected the brake system and found no leaks, the brake pads were over 90% and brake rotors in good condition with no hot spots/glazing, and the vehicle operated as designed.</p> <p>On 3/26/2019 at 40,005 miles, the vehicle was brought to the dealer with complaints that the Service Electronic Braking System warning was illuminated and when coming to a stop excessive effort was needed to depress the brake pedal and vehicle will not stop right away. The technician verified that the brake pedal calibration had not been performed during the 3/16/2019 repair. The technician test drove the vehicle and verified that the vehicle activated ABS as intended.</p> <p>On 9/7/2019 at 4,813 miles, the vehicle was brought to the dealer with complaints that the ABS and brake light came on when braking hard, the brakes did not catch, and the brake pedal goes down when this condition occurs. The technician found no DTCs. The technician reprogrammed the ABS module before test driving the vehicle. During the test drive, the technician performed hard stopping and no ABS or brake lights turned on.</p> <p>On 12/7/2019 at 5,641 miles, the vehicle was brought to the dealer with complaints that while braking, the brake pedal goes to floor and the vehicle was slow to respond and stop. The technician inspected the brake booster with master cylinder and all 4 brakes and rotors and</p>

	<p>found no problems. The technician also road tested the vehicle and found the vehicle stops per factory specs.</p> <p>On 2/29/2020 at 5,849 miles, the vehicle was brought to the dealer with complaints that the vehicle it takes a long time to stop. The technician inspected the brake system and found no problems. A road test found the vehicle stopped under factory specs. No codes were found or TSB or updates applicable.</p> <p>On 3/9/2020 at 5,944 miles, the vehicle was brought to the dealer with complaints that the brakes were not stopping, but no problems were found.</p> <p>On 8/7/2020 FCA US was served with the Complaint.</p>
CRASH	No
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	FCA US did not inspect the subject vehicle.

MATTER #	██████████
FILE TYPE	Lawsuit
FILE NAME	████████████████████
CAIR #	████████████████████
DATE OF INCIDENT	5/18/2021
DATE OF NOTICE	6/30/2021
MODEL/MODEL YEAR	2018 Ram 3500 Longhorn Mega Cab 4x4
VIN	3C63RRNL9JG ██████████
MILEAGE	24,605
OWNER	████████████████████ Auburn Hills, MI ██████████
COURT	Superior Court, San Diego, CA
DOCKET #	████████████████████
ALLEGED DEFECT	Brakes: Component-Not Specified Brakes-ABS: Warning Lamp
DESCRIPTION	<p>On 6/30/2021 the owner contacted FCA US stating that his vehicle had been at the dealer since 5/18/2021 because of an issue with the ABS module and reported that the ABS module had been replaced twice.</p> <p>A review of available dealer records showed on 5/18/2021 at 24,605 miles, the vehicle was brought to the dealer with a complaint that while towing with the 5th-wheel, going down a hill, he had no brakes at the bottom. The owner stated that the brake light, ABS, Traction Control, and Service Trailer ebrake lights came on. The owner reported when he depressed the brake pedal down to start the vehicle the brake pedal went down further than before. He also reported that when he had the vehicle in aux the truck started without pushing the brake. Upon inspection the technician found code C2200-49 in ABS module (anti-lock brake module internal-internal electronic failure) and Code C0044-28 (brake pressure sensor 1 - signal bias level out of range /zero adjustment failure). The technician replaced ABS module only but found C2200-49 still active and could be cleared. An ABS initialization was performed along with proxy alignment and ECU reset. The technician opened a STAR case and was advised to replace the HCU. Technician replaced ABS module and HCU.</p> <p>On 07/09/2021 the vehicle was brought to the dealer with a complaint that brake and ABS lights came again after the ABS module was replaced on 5/18/2021. The technician found code C2200-49 stored in the ABS Module and could not be cleared after replacing ABS Module and HCU, ABS initialization, and proxy alignment and ECU reset.</p>

	On 8/20/2021 FCA US received the Complaint alleging, among other thing, brake concerns. FCA US bought back the vehicle on 10/20/2022.
CRASH	No
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0
ANALYSIS	FCA US's vehicle inspection ¹ revealed active Code C2200-49. The technician inspected the PDC for good fuses for the ABS Module and found fuse cavity 26 missing. The technician installed a 30 AMP fuse and Code C2200-49 went stored. The technician then erased Stored C2200-49 code, test drove vehicle for 20 miles and no further problems found with the braking system.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	██████████
FILE TYPE	Non-Binding Arbitration
FILE NAME	████████████████████
CAIR #	██████████
DATE OF INCIDENT	9/9/2020
DATE OF NOTICE	9/14/2020
MODEL/MODEL YEAR	2018 Ram 2500 Longhorn Crew Cab 4x4
VIN	3C6UR5GL9JG ██████████
MILEAGE	27,804
OWNER	████████████████████ Grove Hill, AL ██████████
COURT	N/A
DOCKET #	N/A
ALLEGED DEFECT	Brakes: Component-Not Specified: Lack/Loss of Power
DESCRIPTION	<p>On 9/14/2020 the owner contacted FCA US stating the week before lights came on for the electronic brakes and ABS system and the dealer replaced a part but the problem returned and the dealer replaced the same part that morning but now he had no brakes and would need a loaner vehicle.</p> <p>A review of available dealer records showed on 9/9/2020 at 27,804 miles, the vehicle was brought to the dealer with a complaint that the ABS Light on. The technician found Code C0020-01 for an internal fault in HCU, and replaced the HCU.</p> <p>The next day the vehicle was brought to the dealer with a complaint that the brakes were not working good. The technician replaced and programmed the Control Module, and during the test drive found the brakes faded.</p> <p>On 09/22/2020 the technician replaced the front hard lines and master cylinder supply hoses, but the problem was still present. The technician contacted STAR and per STAR the technician replaced the master cylinder. The technician test drove the vehicle and no further brake system problems were found.</p> <p>On 9/23/2020 FCA US received the arbitration notice.</p>
CRASH	No
PROPERTY DAMAGE	No
INJURIES	0
FATALITIES	0

ANALYSIS	FCA US did not inspect the subject vehicle.
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