

**New Customer Assistance Inquiry Record (CAIR)#** [REDACTED]

<b>VIN</b>	[REDACTED]	<b>Model Year</b>	2018	<b>Brand</b>	RAM
<b>Body</b>	DJ7P91	<b>Vehicle</b>	RAM 2500 LARAMIE CREW CAB 4X4		
<b>Customer Provided VIN</b>		<b>Line of Business</b>	CAC	Customer Assistance Center	
<b>Batch Case Information</b>					
<b>Open Date</b>	02/12/2020	<b>CAIR Type</b>	Regular	<b>Status</b>	Closed
<b>Close Date</b>	02/25/2020	<b>Origin</b>	Chat	<b>Reason</b>	
<b>Mileage</b>	11 Miles	<b>Market</b>	U	<b>Language</b>	English
<b>Contact Email</b>	[REDACTED]	<b>Contact Phone</b>	[REDACTED]	<b>Contact Mobile</b>	[REDACTED]
<b>Caller Address</b>				<b>Source</b>	Customer
<b>Caller City</b>		<b>Caller Country</b>		<b>Caller Postal Code</b>	
<b>Customer</b>					
<b>Customer Address</b>					
<b>Dealer</b>	45426	ARRIGO DODGE CHRYSLER JEEP RAM		<b>Dealer Phone</b>	9548616200
<b>Dealer Address</b>	5901 MADISON AVE				
	TAMARAC	FL	33321 6412	USA	
<b>Dealer Zone</b>	Southeast	<b>Sales District</b>		<b>Service District</b>	9
<b>Subject</b>	Customer Assistance				
<b>Synopsis</b>	3 attempts, 5 days no contact CM closing the case				
<b>Customer Anomaly</b>					
<b>Contact Reason</b>	C75	Part Not Available/Backordered	<b>Customer Anomaly</b>		
<b>Reason Code</b>	After Sales - Complaint - Parts - Parts - Part in backorder/not available				

**Case Status History**

Create Date	Status
02/12/2020 03:05 PM	New
02/12/2020 03:16 PM	Open
02/14/2020 04:51 PM	Suspended
02/19/2020 12:01 PM	Open
02/25/2020 02:40 PM	Closed

**Initial Description**

Chat Started: Wednesday, February 12, 2020, 10:05:01 (-0500) Chat Origin: NAFTA Non Premium Brandsite Chat Agent Emily ( 7s ) Emily: Hi, my name is Emily with FCA Customer Care, How may I help you? ( 2m 7s ) Visitor: Hi Emily - the truck in question has the ABS lights on and service electronic braking system dinging away - its been in to Arrigo - they have been waiting on replacement ABS module and pump. Is there anyway to get an ETA --- its not there fault, they are waiting on parts. I will be towing a 5th wheel in a couple of weeks --- Safe?? ( 2m 33s ) Emily: I do apologize you are having a concern, I would be happy to look into this with you, in order to look more into this with you may I please have you confirm your name, address, telephone number, email address and the last 8 of the VIN on the vehicle? ( 3m 7s ) Visitor: is it not in the chat i just opened up ( 4m 7s ) Emily: Thank you, I am seeing all the information ( 4m 29s ) Emily: The part that is on order with the dealership is currently back ordered ? ( 4m 45s ) Visitor: yes ( 5m 35s ) Visitor: Just that i will be towing 12,000 lb trailer in a couple of weeks ( 6m 59s ) Emily: Thank you, I would be happy to open a case on the matter and have this looked into for you. May I please have you confirm the name of the dealership ? ( 7m 35s ) Visitor: Thanks emily --- Arrigo Sawgrass 5901 Madison Ave, Tamarac, FL 33321 ( 9m 21s ) Emily: Thank you, the case number will be [REDACTED] I will have someone contact you on the matter of the back order part ( 9m 25s ) Emily: Have I been able to answer all your questions today? Is there anything else that I can look into for you today? ( 9m 33s ) Visitor: thanks Emily!! cheers ( 9m 41s ) Visitor: all good thanks ( 9m 45s ) Emily: You&#39;re welcome ( 9m 54s ) Emily: Thank you for contacting RAM Customer Care. Please chat with us again if you need further assistance. You can also look for updates on our website www.Ramtrucks.com. Have a good day!

**Case Comments**

Date	Comment
02/12/2020	Outbound call to dealer CM spoke to PA Jim who advised both the pump and ABS module are in. Customer SA is Terry. CM was tm to service but left voicemail for Terry.
02/12/2020	Outbound call to customer no answer, left voicemail. CM was seeking to advise customer of below notes.
02/12/2020	***Inbound call from customer customer was not aware since last Thursday parts had arrived. I advised him I spoke to Jim but have not spoke to Terry yet. I advised I was sending an email to SD to see if he could look into it.
02/12/2020	Email sent to SD Pete
02/13/2020	SA Terri states she spoke to customer and appointment is set for 2/18 at 9am.
02/14/2020	Outbound call to customer customer did confirm appointment has been made for 2/18 and they advised it would take the day to repair. Customer advised it would be fine of me to follow up with him on 2/19.
02/17/2020	As advised below CM to follow up with customer on 2/19
02/19/2020	Outbound call to customer no answer, left voicemail CM seeking if repairs have been completed
02/21/2020	Outbound call to customer no answer, left voicemail CM seeking if repairs have been completed
02/25/2020	Outbound call to customer no answer, left voicemail CM seeking if repairs have been completed 3 attempts, 5 days no contact CM closing the case

**Live Chats**

<b>Date</b>	
02/12/2020	<p style="text-align: center;">Chat Started: Wednesday, February 12, 2020, 10:05:01 (-0500)</p> <p style="text-align: center;">Chat Origin: NAFTA Non Premium Brandsite Chat</p> <p style="text-align: center;">Agent Emily</p> <p>( 7s ) Emily: Hi, my name is Emily with FCA Customer Care, How may I help you?</p> <p>( 2m 7s ) Visitor: Hi Emily - the truck in question has the ABS lights on and service electronic braking system dinging away - its been in to Arrigo - they have been waiting on replacement ABS module and pump. Is there anyway to get an ETA --- its not there fault, they are waiting on parts. I will be towing a 5th wheel in a couple of weeks --- Safe??</p> <p>( 2m 33s ) Emily: I do apologize you are having a concern, I would be happy to look into this with you, in order to look more into this with you may I please have you confirm your name, address, telephone number, email address and the last 8 of the VIN on the vehicle?</p> <p>( 3m 7s ) Visitor: is it not in the chat i just opened up</p> <p>( 4m 7s ) Emily: Thank you, I am seeing all the information</p> <p>( 4m 29s ) Emily: The part that is on order with the dealership is currently back ordered ?</p> <p>( 4m 45s ) Visitor: yes</p> <p>( 5m 35s ) Visitor: Just that i will be towing 12,000 lb trailer in a couple of weeks</p> <p>( 6m 59s ) Emily: Thank you, I would be happy to open a case on the matter and have this looked into for you. May I please have you confirm the name of the dealership ?</p> <p>( 7m 35s ) Visitor: Thanks emily --- Arrigo Sawgrass 5901 Madison Ave, Tamarac, FL 33321</p> <p>( 9m 21s ) Emily: Thank you, the case number will be [REDACTED] I will have someone contact you on the matter of the back order part</p> <p>( 9m 25s ) Emily: Have I been able to answer all your questions today? Is there anything else that I can look into for you today?</p> <p>( 9m 33s ) Visitor: thanks Emily!! cheers</p> <p>( 9m 41s ) Visitor: all good thanks</p> <p>( 9m 45s ) Emily: You're welcome</p> <p>( 9m 54s ) Emily: Thank you for contacting RAM Customer Care. Please chat with us again if you need further assistance. You can also look for updates on our website <a href="http://www.Ramtrucks.com">www.Ramtrucks.com</a>. Have a good day!</p>
<b>Date</b>	
02/12/2020	



December 17, 2020

FCA US, LLC.  
P. O. Box 21-8004  
Auburn Hills, MI 48321-8004

RE: Our Matter Ref: [REDACTED] vs. FCA US, LLC.  
Our File No.: [REDACTED]  
VIN: [REDACTED]

To Whom It May Concern:

Please be advised that I have been retained to represent the above referenced Consumer in their claim against FCA US, LLC. ("FCA"). Any further correspondence should be directed hereto. **THIS IS NOT A DEFECT NOTICE.**

My client's 2018 Dodge Ram 2500, meets the statutory requirement of a "lemon" because its defects substantially impair the use, value, and safety of same. As such my client demands that FCA repurchase the "lemon" and reimburse any add-on costs and expenses associated with the "lemon" pursuant to the Statute and the Magnuson-Moss Warranty Enforcement Act. Apart from the statutory repurchase of the subject vehicle, I demand reimbursement of my client's attorney fees and costs, along with any other pecuniary losses resulting from FCA's violation of the Statute and the Magnuson-Moss Warranty Enforcement Act.

Should my client be forced to seek any of these remedies in a lengthy civil action against FCA, the fees, costs and losses sought would obviously, and rightfully, increase considerably. Being so advised, we anticipate that FCA, will respond to this demand favorably and we look forward to hearing from you.

[REDACTED]  
Patrick S. Cousins  
Attorney, Arbitrator, and Certified Mediator

PSC/spc

**RECEIVED**

DEC 30 2020

MILLER, CANFIELD, PADDOCK  
AND STONE, P.L.C.

Comeau Building  
319 Clematis Street  
Suite 701  
West Palm Beach  
Florida 33401  
T. 561.835.1727  
F. 561.835.0766  
W. [www.cousinslawfirm.com](http://www.cousinslawfirm.com)