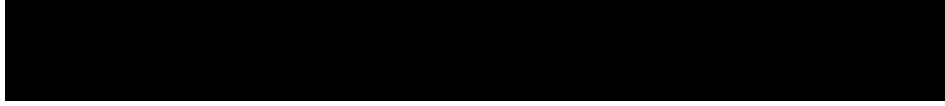


This file represents a consolidation of multiple files sent by the manufacturer. Please use the bookmarks to navigate to each file. (Each bookmark label is the name of the original file.)



Joyce Patrick Morlin
Attorney at Law

1935 Rockledge Drive
Rockledge, FL 32955

CEO OFFICE 02/14/2017

February 09, 2017

Mr. Mark Fields, CEO
Ford Motor Company
1 American Road
P.O. Box 6248
Dearborn, MI 48126

Mr. Willie Ruiz
Newark Collision Center
44-58 Hunter Street
Newark, NJ 07114

Mr. Stephen Giordano
Maplecrest Ford Lincoln
2800 Springfield Avenue
Vauxhall, NJ 07088

RE: 2013 Lincoln MKZ
VIN: 3LN6L2G92 DR [REDACTED]
Color: Red; Interior: Tan
Body Style: 4 door sedan
Engine: 4-2.0L-T

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

FEB 24 2017

OFFICE OF THE
GENERAL COUNSEL

Dear Messrs. Fields, Ruiz, and Giordano:

This is a formal complaint against Ford Motor Company and the associated dealership and repair shop identified above. I represent the clients, [REDACTED] granddaughter and operator of the vehicle and [REDACTED] grandfather and owner of the subject vehicle. On behalf of these clients, this complaint requests compensation in the amount of **Sixty Nine Thousand, Six Hundred Seventy One Dollars and Forty Four Cents (\$69,671.44)** for the damages and losses suffered because of faulty design, engineering and repairs of the braking system of the subject vehicle. In addition, the Ford Motor Company failed to train repair service personnel to diagnose brake problems which resulted in failure to repair defective brakes on the subject vehicle that led to multiple accidents when the brakes failed.

It is undisputed and can be documented that following a collision of the subject vehicle on December 7, 2014 and subsequent repairs by the Newark Collision Center, the repair center authorized for service by USAA insurer, the subject vehicle was returned to service on or about February 6, 2015 (Exhibit A). In February 2015, after the vehicle was repaired, at least three undocumented return visits were made to the Newark Collision Center repair shop regarding problems with the instrument panel and brakes.

Attached is a statement by [REDACTED] wherein problems with the subject vehicle were documented, beginning in March 2015, – notably, the dashboard control panel, the braking system, low brake fluid warnings, and the like (Exhibit B, Exhibit B1).

There were several visits to Maplecrest Ford Lincoln to report problems with the brakes, uncontrollable audio sound levels and warning lights. In each instance, the brakes were considered good and alleged recall notice issues were addressed (Exhibit B2, Exhibit B3).

RE: 2013 Lincoln MKZ

Clients: [REDACTED]

VIN: 3LN6L2G92 DDR [REDACTED]

On May 5, 2015 there was a minor accident on the campus of Rutgers University, New Brunswick, NJ, when the brakes failed (Exhibit C).

On June 6, 2015, a pin hole leak in the brake line was repaired by Newark Collision Center and less than three hours later the brakes completely failed causing a collision on US Highway 1 & 9 in Jersey City, NJ (Exhibit D). The tow truck operator who removed the vehicle from the scene of the collision corroborates the problem with the brake pedal when moving the subject vehicle within the My Way Towing Service lot: **“Beware of Brake Pedal – Goes Down.”** (Exhibit E).

For twenty one (21) months, from December 7, 2014 to February 6, 2015 and from June 6, 2015 to January 5, 2017, the subject vehicle has been out of service. On or about September 14, 2016, the subject vehicle was towed to East West Lincoln in Maryland where Mr. [REDACTED] the owner, monitored the repair of damage from the June 6, 2015 collision (Exhibit F). Even East West Lincoln could find nothing wrong with the brakes until the car was taken on a test drive by the East West repairman. During the test drive, the brakes failed and severely frightened the driver.

East West contacted Ford Motor Company and East West was told to take a 2013 car of the same model, without any engine repairs, with the same braking system and put it side by side with the subject vehicle to determine what might be the problem. When that was done, a photograph of the braking module of the subject vehicle (Exhibit G) was taken and a photograph of the braking module in the 2013 car without engine repairs (Exhibit H) was taken. The following corrective action is noted on the repair invoice (Exhibit I): “Diagnosed Braking System, Found Brake Lines to ABS Module Hydraulic Control Module Not in Proper Location. Replaced Control Module and Rerouted 6 Brake Lines and Bleed System, Road Test Everything Works Normal Now...”

It is my contention that Ford Motor Company, the associated dealerships and repair shops should give more attention to making customers aware of recall notices, should provide repair shops with a better understanding of the design and engineering of braking systems, and provide training in the repair and maintenance of all vehicular safety features – especially the brakes, a vital part of any vehicle that should function properly.

[REDACTED] has been unduly traumatized by the defective brakes in this vehicle which were examined and declared in good working order by Newark Collision Center, Maplecrest Ford Lincoln and even East West Lincoln before contacting Ford Motor Company. It is easy to imagine how a young driver, less than [REDACTED] years old can be scarred for life driving a vehicle that will not stop when brakes are applied; a situation that should not happen to anyone, of any age.

Itemized expenses that have been and/or will be incurred by this family are shown in Exhibit J, including, but not limited to, [REDACTED] loss of employment to pay for college expenses because she no longer had reliable transportation.

RE: 2013 Lincoln MKZ
VIN: 3LN6L2G92 DDR [REDACTED]

Clients: [REDACTED]

I hope the concern of Ford Motor Company officials about this situation will make it possible to resolve this matter without any further action on my part. I would appreciate a reply on or before March 15, 2017.

Respectfully yours,

[REDACTED]
Joyce P. Morlin
Telephone (321) 632-7539

Exhibits (13)

Cc: Brittany A. Richardson
Horace B. Patrick
Mr. Mike Knutson, USAA Claims Division
Mr. Danny Johnson Jr., East West Lincoln
JD Power and Associates
Better Business Bureau of New Jersey

NEWARK COLLISION CENTER
 44-58 HUNTER STREET, NEWARK, NJ 07114
 Phone: (973) 623-5000
 FAX: (973) 623-3100

Workfile ID: 3769b9e6
 Federal ID: 453125649
 License Number: [REDACTED]

Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Written By: Willie Ruiz, 6/9/2015 4:17:15 PM
 Adjuster: Giovannoli, Christine

Insured: [REDACTED]
 Type of Loss: Collision
 Point of Impact: 11 Left Front

Policy #: [REDACTED]
 Date of Loss: 12/7/2014 12:00:00 PM

Claim #: [REDACTED]
 Days to Repair: 50

Owner:
 [REDACTED]
 SPRINGDALE, MD [REDACTED]
 [REDACTED] Evening

Inspection Location:
 NEWARK COLLISION CENTER
 44-58 HUNTER STREET
 NEWARK, NJ 07114
 Repair Facility
 (973) 623-5000 Day

Insurance Company:
 USAA
 UNIT 1230
 VISIT USAA @ USAA.COM OR CALL
 SAN ANTONIO

VEHICLE

Year: 2013	Body Style: 4D SED	VIN: 3LN6L2G92DF [REDACTED]	Mileage In: 11780
Make: LINC	Engine: 4-2.0L-T	License: [REDACTED]	Mileage Out:
Model: MKZ	Production Date: 6/2013	State: MD	Vehicle Out: 2/6/2015
Color: RED Int: TAN	Condition: Good	Job #: [REDACTED]	

TRANSMISSION

Automatic Transmission

POWER

Power Steering
 Power Brakes
 Power Windows
 Power Locks
 Power Mirrors
 Heated Mirrors
 Power Driver Seat
 Power Passenger Seat
 Memory Package

DECOR

Dual Mirrors
 Tinted Glass
 Console/Storage
 Overhead Console

Wood Interior Trim

CONVENIENCE

Air Conditioning
 Intermittent Wipers
 Tilt Wheel
 Cruise Control
 Rear Defogger
 Keyless Entry
 Alarm
 Message Center
 Steering Wheel Touch Controls
 Telescopic Wheel
 Climate Control
 Remote Starter
 Home Link

RADIO

AM Radio

FM Radio

Stereo

Search/Seek
 CD Player
 Auxiliary Audio Connection
 Premium Radio
 Satellite Radio

SAFETY

Drivers Side Air Bag
 Passenger Air Bag
 Anti-Lock Brakes (4)
 4 Wheel Disc Brakes
 Front Side Impact Air Bags
 Head/Curtain Air Bags
 Hands Free Device

ROOF

Electric Glass Sunroof

SEATS

Bucket Seats
 Leather Seats
 Heated Seats

WHEELS

Aluminum/Alloy Wheels

PAINT

Three Stage Paint

OTHER

Fog Lamps
 Traction Control
 Stability Control
 Signal Integrated Mirrors
 Xenon Headlamps
 Power Trunk/Gate Release



Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1	#	OK TO PAY- Y		1			
2	#	DATE RECEIVED 12/11/2014		1			
3	#	DATE CONTACTED 12/11/2014		1			
4	#	DATE INSPECTED 12/15/2014		1			
5	#	DATE SCHEDULED		1			
6	#	DATE SENT/UPLOADED 12/15/2014		1			
7	#	S01 ERT + EDT = 40		1			
8	#	DRIVABLE - N		1			
9	#	CUSTOMER CONTACTED PER USAA GUIDELINES OF EVERY OTHER DAY		1			
10	#	CLAIMS PROCESS FULLY EXPLAINED TO OWNER AT TIME OF INSPECT		1			
11	#	SIGNED AUTHORIZATION IN FILE		1			
12	#	DIRECTION TO PAY IN FILE		1			
13	#	EXPLAINED USAA QRP BROCHURE AND GIVEN TO OWNER		1			
14	#	EXPLAINED USAA WARRANTY BROCHURE AND GIVEN TO OWNER		1			
15	#	EXPLAINED ESTIMATE AND PROVIDED COPY TO OWNER		1			
16	FRONT BUMPER & GRILLE						
17		Repl Bumper cover w/o tow hook w/park assist	DP5Z17757CAPTM	1	773.38	2.9	3.0
18	S01	Add for Three Stage					2.1
19		Add for park sensor				0.7	
20	#	Subl FLEX ADDITIVE, 1ST PNL		1	6.00 T		
21	S01	Repl RT Side retainer	DP5Z17C947A	1	58.98	Incl.	
22		Repl LT Side retainer	DP5Z17C947B	1	58.98	Incl.	
23		Repl RT Side retainer rivet	W706737S300	4	4.28		
24		Repl LT Side retainer rivet	W706737S300	4	4.28		
25		Repl Park sensor outer	AA5Z15K859AA	1	154.90	0.2	0.2
26		Repl LT Reflector	DP5Z13A565F	1	59.85	Incl.	
27		R&I License bracket				0.2	
28	S01	Repl LT Upper grille	DP5Z8201BA	1	368.85	Incl.	
29	*	S01 Repl Wire harness w/park sensor	DP5Z15K867B	1	68.67	<u>0.5</u>	
30	#	S01 Repl Wiring Socket	DP5Z14A411E	1	21.02		
31	FRONT LAMPS						
32		Repl LT Headlamp assy w/signature lighting to 12/10/13	DP5Z13008H	1	1,998.88	0.3	

6/9/2015 4:17:17 PM

Page 2

Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

33			Aim headlamps				0.5	
34	#	S01	Repl LT Headlamp assy brkt	DS7Z13A005A	1	15.98		
35			Repl LT Fog lamp assy w/signature lighting	DP5Z15A201D	1	708.05	Incl.	
36	RADIATOR SUPPORT							
37			Repl Mount panel w/o 3.7 liter from 6/04/13	DP5Z16138E	1	220.45	1.4	
38			Repl Upper tie bar	DS7Z8A284A	1	301.93	1.2	0.8
39		S01	R&I Shutter w/adaptive cruise to 7/13/14			m	0.4	M
40			R&I Under cover w/2.0 liter TURBO w/o AWD				0.3	
41		S01	Repl LT Bracket	DP5Z13N020A	1	7.63		
42	COOLING							
43		S01	Repl Radiator	DG9Z8005E	1	401.91	m	2.5 M
44		S01	Deduct for Overlap				-0.5	M
45	#		Subl A/C RECHARGE, INCLUDES FREON AND OIL		1	80.00	T	
46		S01	Repl LT Upper insulator	6G9Z8125A	2	12.26		Incl.
47		S01	Repl LT Upper bracket	DG9Z8A193A	2	14.66		
48	AIR CONDITIONER & HEATER							
49		S01	Repl Condenser	DG9Z19712A	1	197.40	m	Incl.
50		S01	Deduct for Overlap				-0.2	
51	HOOD							
52			R&I R&I hood assy				0.6	
53	*		Rpr Hood				<u>6.0</u>	2.8
54		S01	Add for Three Stage					2.0
55			Add for Underside(Complete)					1.4
56			Repl Insulator retainer clip	W709688S300	12	10.56		
57	*		Rpr LT Hinge				<u>0.3</u>	<u>0.0</u>
58			R&I Front w'strip				0.2	
59		S01	Repl LT Stopper	DS7Z16758D	1	38.40		
60		S01	Repl LT Hood bumper side	DS7Z16758B	1	7.68		
61	FENDER							
62		S01	R&I RT R&I fender assy				2.1	
63		S01	Deduct for Overlap				-0.4	
64			Repl LT Fender	DP5Z16006A	1	278.05	2.3	2.0
65			Overlap Major Adj. Panel					-0.4
66		S01	Add for Three Stage					0.6
67			Add for Edging					0.5
68			Deduct for Overlap				-0.4	
69			Repl LT Rear insulator	DS7Z16072B	1	42.80		Incl.
70			Repl LT Fender liner	DP5Z16103A	1	142.00		Incl.
71	*		Rpr LT Apron assy w/o 2.0 liter DOHC (HSS)			s	<u>4.5</u>	3.0
72			Overlap Minor Panel					-0.2



Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

73	*	S01	Rpr	LT Mount bracket (HSS)			s	<u>2.0</u>	0.3
74		S01		Add for Three Stage					0.1
75	ELECTRICAL								
76			R&I	Battery			m	0.4	M
77			Repl	Horn	DG9Z13832A	1	21.47	0.2	
78		S01	Repl	TPMS sensor 315mhz	9L3Z1A189A	1	86.60	m	0.2 M
79	*	S01	Repl	Wire harness headlamp w/adapt. cruise	DP5Z14290HA	1	478.48	<u>6.0</u>	M
80		S01	Repl	Wire harness jumper	DP5Z14A411F	1	6.67		
81	*	S01	Repl	Battery cable 2.0 liter TURBO	DG9Z14300Z	1	<u>239.82</u>	<u>2.0</u>	M
82	#	S01	Repl	Bushing	3M5Z2L523AA	1	7.08		
83	#	S01	Repl	Brake Switch	8T4Z13480A	1	37.88		0.5 M
84	WHEELS								
85	**		Repl	RECOND LT/Front Wheel, alloy type 1	DP5Z1007B	1	368.00	m	0.3
				Note: RECOND SAME WHEEL.					
86	TIRES								
87	*		Repl	<u>PIR 245/40R19_ZR PZero Nero All Season BW 98W</u>	PI09833	1	205.99		0.3
88	#			State Motor Vehicle Tire Fee		1	1.50	X	
89	#			Tire Disposal Fee		1	3.00	T	
90	#		Subl	WHEEL BALANCE, ALLOY		1	20.00	T	
91	FRONT SUSPENSION								
92		S01	Repl	LT Strut to 2/21/14	EG9Z18124B	1	306.78	m	1.6 M
93		S01	Repl	LT Knuckle	DG9Z3K186B	1	95.82	m	2.2 M
94		S01		Deduct for Overlap					-0.3 M
95	#		Subl	FOUR WHEEL ALIGNMENT		1	80.00	T	
96		S01	Repl	LT Hub	DG9Z1104D	1	100.70	m	Incl.
97		S01	Repl	Bleed brake system		1		m	0.5 M
98	INSTRUMENT PANEL								
99		S01	R&I	R&I instrument panel					4.8
100	RESTRAINT SYSTEMS								
101		S01	Repl	LT Front sensor	CP9Z14B004A	1	78.35	m	0.2 M
102	PILLARS, ROCKER & FLOOR								
103	*	S01	Rpr	LT Aperture panel				s	<u>8.0</u> <u>3.5</u>
				Note: LT FRT HINGE PILLAR, REF LT FRT WINDSHIELD POST, BLEND LT SIDE ROCKER PANEL.					
104				Overlap Major Adj. Panel					-0.4
105		S01		Add for Three Stage					1.2
106	*	S01	Rpr	LT Hinge plr reinf				s	<u>4.0</u> <u>0.8</u>
107			R&I	RT Rocker molding					0.9
108			R&I	LT Rocker molding					0.9
109	*	S01	Rpr	LT Rocker molding					<u>3.5</u> 2.3
110				Overlap Major Non-Adj. Panel					-0.2
111		S01		Add for Three Stage					0.8
112	#	S01	Subl	Plastic repair kit		1	30.00	T	
113	FRONT DOOR								

Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

114	S01	R&I	RT R&I door assy					1.1	
			Note: ACCESS TO WIRING HARNESS.						
115		Repl	LT Door shell	DP5Z5420125A	1	819.85		5.9	3.3
116			Overlap Major Adj. Panel						-0.4
117	S01		Add for Three Stage						1.2
118		Repl	LT Front w'strip	DP5Z5420521A	1	26.15	Incl.		
119	S01	Repl	LT Upper hinge	BB5Z7822801A	1	31.60		0.3	0.3
120	S01		Add for Three Stage						0.1
121	S01	Repl	LT Lower hinge	CJ5Z7822811A	1	36.07		0.3	0.3
122	S01		Add for Three Stage						0.1
123	*	S01	Repl	LT Cyl rod	DP5Z5422135A	1	<u>16.22</u>		
124	REAR DOOR								
125		Blnd	LT Outer panel						1.6
126		R&I	LT Belt molding					0.3	
127	*	R&I	LT Applique front					<u>0.2</u>	
128		R&I	LT Applique rear					0.2	
129		R&I	LT Side molding					0.3	
130		R&I	LT Handle, outside					0.4	
131		R&I	LT R&I trim panel					0.6	
132	#	Subl	CAR COVER		1	3.00	T		
133	#	S01	Repl	Brake Fluid	4	38.92			
134	#	Subl	CAULKING/SEAM SEALER (PER PANEL)		1	16.00	T		
135	#	Subl	CORROSION PROTECTION, 1ST PNL		1	20.70	T		
136	#	Subl	HAZARDOUS WASTE REMOVAL		1	3.00	T		
137	#	Rpr	SETUP AND MEASURE					2.0	
138	#	Algn	UNIBODY/FRAME REPAIR					3.0	F
139	#	S02	SENDING UNRELATED PICTURES		1				
SUBTOTALS						9,237.48		78.4	32.7

NOTES

Estimate Notes:

UNRELATED DAMAGE
 RT FRT DOOR MIRROR, RT REAR WHEEL, LT SIDE REAR BUMPER.
 SENDING UNRELATED PICTURES.

Prior Damage Notes:

NO

Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

ESTIMATE TOTALS

Category	Basis	Rate	Cost \$
Parts			8,974.28
Body Labor	59.7 hrs @	\$ 47.00 /hr	2,805.90
Paint Labor	32.7 hrs @	\$ 47.00 /hr	1,536.90
Mechanical Labor	15.7 hrs @	\$ 49.00 /hr	769.30
Frame Labor	3.0 hrs @	\$ 48.00 /hr	144.00
Paint Supplies	32.7 hrs @	\$ 27.00 /hr	882.90
Miscellaneous			263.20
Pre-Tax Discount		-2.3 %	-353.66
Subtotal			15,022.82
Sales Tax	\$ 6,253.48 @	7.0000 %	437.74
Other Tax 1	\$ 8,767.87 @	3.5000 %	306.88
Grand Total			15,767.44
Deductible			500.00
CUSTOMER PAY			500.00
INSURANCE PAY			15,267.44



Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

SUPPLEMENT SUMMARY

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
Added Items							
139	#	S02	SENDING UNRELATED PICTURES	1			
SUBTOTALS					0.00	0.0	0.0

TOTALS SUMMARY

Category	Basis	Rate	Cost \$
Parts			0.00
Subtotal			0.00

CUMULATIVE EFFECTS OF SUPPLEMENT(S)

Estimate	11,689.01	Willie Ruiz
Supplement S01	4,078.43	Willie Ruiz
Supplement S02	0.00	Willie Ruiz
Job Total:	\$ 15,767.44	
CUSTOMER PAY:	\$ 500.00	
INSURANCE PAY:	\$ 15,267.44	

Please Present A Copy Of This Estimate To A Repair Facility Of Your Choice

*USAA Subsidiaries include: United Services Automobile Association(USAA), USAA Casualty Insurance Company(CIC), USAA General Indemnity Company(GIC) USAA County Mutual Insurance(CMI) and Garrison Property Casualty Insurance Company. Garrison Property and Casualty Insurance Company, a subsidiary of USAA Casualty Insurance Company, is authorized to use the USAA logo, a registered trademark of United Services Automobile Association.

This is not an authorization to repair. Failing to present this estimate to the repairing garage before repair may result in additional expenses to you. A USAA appraiser must authorize any supplement to this estimate. Repairs to this vehicle may require specific welding equipment as recommended by the manufacturer.

If alternative quality replacement parts have been included in this appraisal, the source for these parts has also been disclosed. If alternative quality replacement parts as listed on the appraisal are ultimately used in the repair of your vehicle, the warranty on such parts will be equal to, or greater than, the parts being replaced, as stated in USAA's limited parts warranty. USAA warrants that the parts used on your vehicle will be of like kind and quality, function, fit, safety and corrosion protection as the part or parts they replace. USAA identifies certified and validated parts for sheet metal replacement parts.

VISIT USAA @ USAA.COM OR CALL

ANY PERSON WHO KNOWINGLY FILES A STATEMENT OF CLAIM CONTAINING ANY FALSE OR MISLEADING INFORMATION IS SUBJECT TO CRIMINAL AND CIVIL PENALTIES.

Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

Estimate based on MOTOR CRASH ESTIMATING GUIDE. Unless otherwise noted all items are derived from the Guide DR2KF13, CCC Data Date 6/1/2015, and the parts selected are OEM-parts manufactured by the vehicles Original Equipment Manufacturer. OEM parts are available at OE/Vehicle dealerships. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships. OPT OEM or ALT OEM parts may reflect some specific, special, or unique pricing or discount. OPT OEM or ALT OEM parts may include "Blemished" parts provided by OEM's through OEM vehicle dealerships. Asterisk (*) or Double Asterisk (***) indicates that the parts and/or labor information provided by MOTOR may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM or A/M. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2015 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a complete list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

SYMBOLS FOLLOWING PART PRICE:

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category. X=Miscellaneous Non-Taxed charge category.

SYMBOLS FOLLOWING LABOR:

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category. M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

OTHER SYMBOLS AND ABBREVIATIONS:

Adj.=Adjacent. Algn.=Align. ALU=Aluminum. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel. CAPA=Certified Automotive Parts Association. D&R=Disconnect and Reconnect. HSS=High Strength Steel. HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non Adjacent. NSF=NSF International Certified Part. O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. Subl=Sublet. UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

CCC ONE Estimating - A product of CCC Information Services Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.

Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

ALTERNATE PARTS SUPPLIERS

Line	Supplier	Description	Price
85	Keystone 55 SHEPHERDS LANE TOTOWA NJ 07512 (800) 648-7483 (973) 389-8200	#ALY03954U80 RECOND LT/Front Wheel, alloy type 1	\$ 368.00

Supplement of Record 2 with Summary

Customer: [REDACTED]

Job Number: [REDACTED]

Vehicle: 2013 LINC MKZ 4D SED 4-2.0L-T RED

TIRE PARTS SUPPLIERS

Line	Description	Supplier	Price
87	PIR 245/40R19 ZR PZero Nero All Season BW 98W	Tire Rack	\$ 205.99
	7101 VORDEN PKWY, SOUTH BEND IN 46628-0	(800) 445-0179	



DOCUMENTATION OF VEHICLE MALFUNCTION/EVIDENCE

BY [REDACTED]

STATEMENT

1. In 2014, my grandfather bought (financed) a 2013 Lincoln MKZ for me for college. The car is registered to and insured by him, [REDACTED], in Maryland. My grandfather purchased extended service/warranty coverage, which I have used for all service--including recalls--at Maplecrest Ford Lincoln dealership (Vaux Hall, NJ).
2. On March 30, 2015, Maplecrest Ford Lincoln serviced the car for problems that I began experiencing with the car. Specifically, I was concerned about unusual noises under the hood and changes in braking. As noted on the service record [see Evidence A], Maplecrest dismissed the sounds under the hood, serviced a recall issue (pertaining to the seat belt and airbag), and performed a multi-point inspection--which included inspecting the brakes. As also noted, Maplecrest reported that the car's brakes were good; however, they sanded brake surfaces (upon observing "slightly rusted" surfaces).
3. I continued to have problems with the brakes: During braking, the brake pedal would occasionally go to the floor and, while driving, a chime would sound and the "low brake fluid" warning light would very briefly illuminate (lasting less than a second). Because the warning light illuminated so briefly, it took many occurrences before I could take my eyes off of the road and see the "low brake fluid" warning message on the console. In one instance, I recorded the warning light as it intermittently flashed across the dashboard. This video [see Evidence B] not only illustrates an ongoing issue with the braking system of the car, but also demonstrates a problem with the dashboard display as well. Upon discerning the warning, I checked my brake fluid frequently and sometimes found it to be low--and therefore began driving around with bottles of brake fluid in my car.
4. I continued experiencing intermittent "low brake fluid" warnings and occasional braking problems. (Sometimes the brake fluid would be low, but other times it would be fine--but I did not notice any correlation between the occasional braking problems, the brief "low brake fluid" warnings or actual low brake fluid levels.) However, I did notice other problems with the car's central console (where the "low brake fluid" warning light would display): All by itself, the stereo volume would increase (to the maximum volume) or decrease (to no volume), or the air conditioner's fan speed would go to the maximum fan speed, which was very frightening--especially when the car was in motion.
5. On April 6, 2015, I took the car back to Maplecrest Ford Lincoln for the issues described above. Maplecrest determined that the console was defective and replaced it, but as noted in the service record [see Evidence C], they again performed a multi-point service inspection (including a safety check) and again reported that they did not find any problem with the brakes. Assured that the car was safe to drive, I continued to drive the car although the braking problems (described in paragraph 4 above) continued and I began experiencing new, intermittent problems with the battery and/or electrical

DOCUMENTATION OF VEHICLE MALFUNCTION/EVIDENCE

BY [REDACTED]

system: Sometimes, as though the battery had been disconnected, the car would not only not start, but none of the lights or anything would come on when I entered the car. Rutgers police assisted me twice with this new problem: late one night on Rt. 18 (in/near East Brunswick, NJ) while returning to campus after leaving my off-campus job and again one day on campus as I left class.

6. On May 5, 2015, I had a minor accident as I was approaching a stop sign on my college campus (Rutgers University, New Brunswick). While braking, the brake pedal went to the floor and failed to stop my car--which rear-ended the car in front of me that was stopped at the stop sign. Due to my low speed, damage to my car and the other driver's car limited; however, the other driver and I observed a considerable puddle of brake fluid on the ground under my car. A campus police officer had me slowly move my car to a space in a nearby parking lot, where I waited for my parents to arrive to pay for estimated damages [see Evidence D] to the other driver's car, observe the brake fluid on the ground and to fill the brake fluid reservoir themselves for my assurance.
7. A day or two after the accident (described in paragraph 6 above), I took the car to a nearby Ford Lincoln dealership to get an immediate second opinion on the continued braking problems--explaining that I had just had a minor accident due to the brakes. The dealership's General Manager observed that Maplecrest Ford Lincoln had serviced the brakes and said that he could not inspect the car without permission from both the owner (i.e., my grandfather) and Ford Lincoln headquarters (because I believed my accident was due to brakes that another Ford Lincoln dealership had serviced). After explaining that my grandfather was in Maryland and could not be reached to immediately provide permission, I had my father come to my campus to take the car to a body shop that had performed auto body repairs on my car (near my home, which is approximately 20 miles from campus) in December 2014.
8. On June 6, 2015, the auto body shop inspected the car and noticed a small "pin hole" in the brake line and repaired it--indicating that the pin hole leak was not related to their repairs to the car's body, but that the pin hole leak was now repaired and may resolve the brake problems described in paragraph 2.
9. Less than three hours after taking the car from the body shop on June 6, 2015, I was driving on US Highway 1&9 in Jersey City, NJ when the brakes completely failed--i.e., the brake pedal went completely to the floor without slowing the car--and my car collided into the car in front of me, causing substantial damage to my car and the other driver's car. I was horrified and crying hysterically, relieved only by the fact that the other driver did not report [See Evidence E] being injured and that my injuries included only a bump on my head and sore foot for which I declined medical treatment.
10. From the scene of the accident, my car was moved to and stored at "My Way" auto repair and towing shop, less than a mile away also on US Highway 1&9 in Jersey City, NJ. The car remained there for several days, where the owner of "My Way" reported that

DOCUMENTATION OF VEHICLE MALFUNCTION/EVIDENCE

BY [REDACTED]

he also experienced and noted that the brake pedal went down to the floor when he moved the car within his auto body yard [see evidence F].

11. At the request of USAA (i.e., my grandfather's auto insurer), the car was towed back to the auto body shop for inspection by a local USAA representative and the body shop. The body shop owner elevated the car on their racks, and showed the USAA representative where he had repaired the "pin hole" in the brake fluid line and confirmed that it was not the cause of the accident. USAA has refused coverage for the damages due to the accident, as has NJ Manufacturers Insurance Company, which insures me on my mother's auto insurance policy.
12. Since the accident, my unrepaired car has been garaged at my home (South Orange, NJ) undriven (except by my father, who drove the car slowly and cautiously home from the auto body shop)--as I am terrified by and refuse to drive the car. Since the accident, I sought the services of lawyers and accident investigators to perform a forensic investigation of the accident and inspection of the car. Accident investigators have declined, indicating that they provide services only to attorneys; and attorneys have declined to take my case (because I maintain that I did not incur serious bodily harm in the accident.)
13. Having nowhere else to turn, I performed an internet search on my car's make and model and learned that not only had others encountered similar or identical braking problems with their Ford and Lincoln cars, but that there is and was an active safety recall by Ford Lincoln for the brake problems that I experienced. Although the recall was issued before Maplecrest Ford Lincoln serviced my car both times, Maplecrest neither advised me of the safety recall nor performed the necessary service for the recall.
14. Upon learning this, I obtained my car's service records from Maplecrest and learned of 2 other outstanding recalls for the car [see Evidence G]. When I contacted my grandfather, he said he was unaware of the recalls on the car.
15. Based on my earlier unsuccessful attempts to retain an attorney or accident investigator after the accident on June 6, 2015, I then contacted the National Highway Traffic Safety Administration (NHTSA) and my (NJ) Attorney General's office -- both of whom recommended that I file a complaint against Ford Lincoln. However, I would like to retain the services of attorney (and accident investigator, if necessary) to properly file a complaint to have Ford Lincoln to resolve all problems with my brakes, console, and/or electric system my claim and compensation for the damages to both my car and the other driver's car and related expenses (e.g. towing expenses, loss of use, rental car expenses, etc.).

DOCUMENTATION OF VEHICLE MALFUNCTION/EVIDENCE

BY [REDACTED]

EVIDENCE

- A. March 30, 2015 Service Record from Maplecrest Ford Lincoln in Vauxhall, NJ
- Dealership service record for noise under car's hood and braking issues. Quality Control inspection notes that brake inspection was performed, braking surfaces were sanded and a seat belt-related safety call was addressed. Unknown to me, a safety recall for brakes had been issued.
- B. Cell Phone Video of Intermittent Flashing 'Low Brake Fluid' Warning
- This video clip captures 'low brake fluid' warning, which blinked quickly and intermittently, and potential problems with the dashboard. This warning light issue started in April of 2015 and was also consistent with other car troubles I had after taking it to get services at the dealership - such as observing brake fluid under the car and the brake pedal going to the floor at times.
- C. April 5, 2015 Service Record from Maplecrest Ford Lincoln in Vauxhall, NJ
- Dealership's Service Record for problems with the car's control display console and continued brake problems. The dealership replaced the central console and inspected the brakes but reported no problems or findings regarding the brakes. Again the dealership did not advise of or correct the safety recall for the brakes.
- D. Compensation Agreement for May 5, 2015 Minor Accident
- This signed agreement documents the compensation made for the minor damages to a stopped car in front of me when my brakes failed as I approached a stop sign. (I was unable to come to a complete stop and consequently rear-ended the other driver). The other driver and I settled the accident-related costs to his car directly, without filing a police report or a claim with our respective auto insurers.
- E. June 6, 2015 Accident Report
- Accident report documents my efforts to stop and the brake failure, as well as the other driver also noted in the police report.
- F. Invoice from Towing Service Company
- My Way Towing Service, who stored my car after the June 6, 2015 accident, moved my car from one area to another within the company's lot, and observed that the brake pedal went all the way down to the floor. "Beware of Brake – Pedal goes Down" is noted on the invoice.
- G. Safety Recall 14N02 (ABS System Signal Communication Loss)
- This safety recall was initiated in 2014 to address the anti-lock braking system's (ABS) speed signal communication loss that disables OBDII's, on-board diagnostics system monitors. The communication loss and/or malfunction involving the braking system is among the problems I experienced, as captured in the video [Evidence B] which shows the "low brake fluid" warning that intermittently and briefly flashed on the console, including at the time of the major June 6, 2015 accident.

**STILL PHOTO OF VIDEO OF
MALFUNCTIONING DASHBOARD DISPLAY**



EXHIBIT B1 X
plane (US) [REDACTED]

! Your iCloud storage is almost full. If you run out of storage, photos, videos, documents and data will no longer be updated. Learn More »

April 17, 2015, 3:54:40 PM
1,740 of 2,579

Navigation icons: Home, Back, Forward, Refresh, Stop, Search, etc.

**EXHIBIT B2
MAPLECREST FORD
LINCOLN SERVICED
RECALL ISSUE AND
INSPECTED BRAKES**

OASIS
RESULT: 3LN6L2G92DR [REDACTED] USA: EN-US

29-JUNE-
2016 / 13:34:07 EST/ EDCAS041B
Local Time: 29-JUNE-2016 /
1:34:11 PM

VEHICLE INFORMATION

Additional Information

VEHICLE DESCRIPTION: 2013 MKZ	VERSION/SERIES: SERIES 31	PAINT COLOR: Ruby Red TC
BODY STYLE: 4 DOOR SEDAN-6 LITE	DRIVE TYPE: 2 WHL L/H FRONT DRIVE	PAINT CODE: RR
ENGINE: 2.0L EcoBoost (250PS)	AXLE RATIO: 3.21 Ratio	GROSS VEHICLE WEIGHT: 4810 LB. GVW
ENGINE CALIBRATION: DC91LF0A	AXLE CODE: 32	RADIO
TRANSMISSION: 6 Speed Auto Trans 6F Mid-Range	WHEEL SIZE: Alloy 8 X 19	SYNC VERSION: V3 Gen2
FLEX FUEL: N	TIRE: 245/40 ZR 19 BSW A/S	VHR ACTIVATED: Y

• **NO WARNING MESSAGES FOUND FOR THIS VIN**

• **ACCURATE REPAIR NOTIFICATIONS**
NO ARN MESSAGES FOUND

• **GENERAL WARRANTY INFORMATION**

New Vehicle Base Warranty

WARRANTY START DATE: 28-JANUARY-2014	BUILD DATE: 28-JUNE-2013	RELEASE DATE: 01-JULY-2013
SALE MILEAGE		

OUTSTANDING FIELD SERVICE ACTIONS

12M02 SYNC WITH MYFORD/MYLINCOLN TOUCH - WARRANTY EXTENSION COVERING ACCESSORY PROTOCOL INTERFACE MODULE (APIM)

14N02 EXTENDED WARRANTY COVERAGE FOR PCM REPROGRAMING IN THE EVENT OF ABS VEHICLE SPEED SIGNAL RELATED COMMUNICATION LOSS THAT DISABLES OBDII SYSTEM MONITORS

15S14 STEERING GEAR MOTOR BOLT CORROSION

• **EXTENDED COVERAGES**

Competitive make ESP part verification

0992 - USA 2014 NEW 48/50K LINCOLN MAINTENANCE 7.5K INTERVAL

STANDARD DEDUCTIBLE: 0 USD	OWNER NAME: VALUED LINCOLN CUSTOMER	OPTIONS:
EXPIRATION DATE: 28-JANUARY-2018	DISTANCE: 51000	RENTAL: 0 UP TO 0 DAYS
TOWING: 0 USD	CONTRACT SOLD BY: USA 47266	ESP CONTRACT START DATE: 28-JANUARY-2014

OWNER OF VEHICLE MUST MATCH OWNER NAME ON OASIS FOR COVERAGE TO APPLY. LOF, MULTI-POINT INSPECTION, ROTATE TIRES COVERAGE ONLY. NO WEAR OR OTHER SCHEDULED MAINTENANCE PARTS COVERED. 6 REMAINING MAINTENANCE SERVICES

0968 - USA 2015 NEW 36/45K PREM MAINT-WEAR ONLY-10K INTERVAL

STANDARD DEDUCTIBLE: 0 USD	OWNER NAME: [REDACTED]	OPTIONS:
EXPIRATION DATE: 28-JANUARY-2017	DISTANCE: 46000	RENTAL: 0 UP TO 0 DAYS
TOWING: 0 USD	CONTRACT SOLD BY: USA 10048	ESP CONTRACT START DATE: 28-JANUARY-2014

OWNER OF VEHICLE MUST MATCH OWNER NAME ON OASIS FOR COVERAGE

TO APPLY.

- **WARRANTY REPAIR HISTORY**
NO RECENT REPAIR HISTORY ON VEHICLE

[Click Here for Full
Warranty History](#)

**EXHIBIT B2
MAPLECREST FORD
LINCOLN SERVICED
RECALL ISSUE AND
INSPECTED BRAKES**

| [Report a Vehicle Concern](#) | [On-line 1878](#) | [SSSC](#)

END OF OASIS REPORT FOR 3LN6L2G92DF [REDACTED]

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Repair Order Detail - Internal Copy

RO Number: [REDACTED]

RO Status: CLOSED

Customer: [REDACTED]
 Phone(s): Contact: [REDACTED]
 Vehicle: 3LN6L2G92DR [REDACTED]

Main: [REDACTED]
 2013 MKZ RED

Click to View Cust Copy
 Cell:

Mileage: 12,759
 Service advisor: 879
 Tag number: [REDACTED]

Payment type: CASH
 Promised time: 05:00 PM
 Promised date: 04/06/2015

Waiter: No
 Estimate: 0.00
 Customer Comments: No

A CUSTOMER STATES RADIO VOLUME AT TIMES WILL INCREASE AND DECREASE INTERMITTENTLY CHECK OPERATION AND ADVISE					
18805D	ISP	AUDIO UNIT PART NUMBER - ACQUIRE AND ORDER (18806/18C815/18C869/ 18K931) - L	0.20		7.60
Tech(s): 542					
18805D4	ISP	AUDIO CONTROL UNIT REPROGRAM/CONFIGURE (18806/18C815/18C869/ 18K931) - L	0.10		3.80
Tech(s): 542					
18805E	ISP	AUDIO UNIT - REPLACE (18806/18C815/18C869/ 18K931) - L	0.80		30.40
Tech(s): 542					
04536B	ISP	CONSOLE ASSEMBLY - ACCESS (45A36/45B30) - L	1.20		45.60
Tech(s): 542					
Pts:	0.00	Lbr:	87.40	Other:	0.00
Story: 12765 REPLACE RADIO ASSEMBLY INTERNAL R/1000 CONCERN MD					87.40

B PERFORM MULTIPOINT INSPECTION					
98P	ISP	PERFORM SAFETY CHECK	0.00		0.00
Tech(s): 542					
Pts:	0.00	Lbr:	0.00	Other:	0.00
					Total Line B:
					0.00

Customer Pay	
Labor	0.00
Parts	0.00
Lube	0.00
Sublet	0.00
Miscellaneous/Shop Charge	0.00
Deductible	0.00
Total Charges	0.00
Less Insurance/Adjustment	0.00
Sales Tax	0.00
Total	0.00

I, [REDACTED], acknowledge receipt of
\$600⁰⁰ cash from [REDACTED], whose
home address is [REDACTED], South Orange,
NJ [REDACTED], on Tuesday, May 5, 2015 as full
payment for the damages to rear bumper
of Rolando Torres' 2015 Honda Civic (S48 CSF)
this is for full payment for all damage from
[REDACTED]

X [REDACTED]

Date: 5-5-15

X [REDACTED]

Date: 5/5/15

THE PORT AUTHORITY OF NY & NJ

MOTOR VEHICLE CRASH REPORT

PA0621 / 08-10

1. Motor Vehicle Crash No.		7. Date of Crash		3. Date Reported		4. Facility		5. New York / New Jersey		6. Police Command		Reference No. (Engineering Use)		Page																						
[REDACTED]		06-06-2015		06-06-2015		HT		New Jersey		HT		[REDACTED]		1 of 2																						
110	8. Day of Week	7. Time (24 Hours)	8. Amended Report	9. Photos	10. Reportable	11. PA Property Damaged	12. ADA	13. Detailed Location								170A																				
1	Sat	1500	No	No	No	No	No	RT 139 West bound (covered roadway) Jersey City, NJ 07302								1																				
14. Reporting Officer's Name (Print)				15. Shield No.		16. Shield No.		170B								1																				
PO Brozek				3301		120		180A								1																				
120. [REDACTED]				19A. VEH. No.		20B. Driver/Pedestrian Name (circle one) from Driver's License		21B. VEH. No.		190B								1																		
Michael Miele Jr.				1		[REDACTED]		2		190C								1																		
22A. No., Street				23A. City, State, Zip		24A. Date of Birth		25B. City, State, Zip		26B. Date of Birth		190A								88																
114 Knoll Terr.				West Caldwell, NJ, 07006		[REDACTED]		South Orange, NJ, [REDACTED]		[REDACTED]		190B								88																
25A. Lic. State		26A. Driver's License No.		27A. Exp. Date		28A. CDL		25B. Lic. State		26B. Driver's License No.		27B. Exp. Date		28B. CDL		190B								88												
1		NJ		5-31-17		No		1		NJ		12-31-16		No		190C								11												
29A. Owner's Name (from Registration)				30A. No., Street				31A. City, State, Zip				29B. Owner's Name (from Registration)				30B. No., Street				31B. City, State, Zip				190D								19				
[REDACTED]				[REDACTED]				[REDACTED]				[REDACTED]				[REDACTED]				190D								19								
32A. Passengers		33A. VIN		34A. Veh. Year		35A. Veh. Make		36A. Veh. Model		37A. State		38A. Plate No.		32B. Passengers		33B. VIN		34B. Veh. Year		35B. Veh. Make		36B. Veh. Model		37B. State		38B. Plate No.		190E								5
2		1G2NW52E63M		2003		Pon		Grand Am		NJ		[REDACTED]		0		3LN6L2G92DR		2013		Linc		MD		[REDACTED]		190E								5		
39A. Insurance Carrier Name				40A. Ins. Code		39B. Insurance Carrier Name				40B. Ins. Code		200A								5																
Progressive				135		United Services Auto Asso.				823		200A								5																
41A. Insurance Policy No.				42A. Ins. Exp. Date		41B. Insurance Policy No.				42B. Ins. Exp. Date		200B								1																
[REDACTED]				08-07-2015		[REDACTED]				10-13-2015		200B								1																
43A. Summons and/or Arrest No.				44A. Violation Code(s)				43B. Summons and/or Arrest No.				44B. Violation Code(s)				200C								1												
None Issued				N/A				None Issued				N/A				200C								1												
45A. Towed Authorized By		46A. Towed By		47A. Towed To		45B. Towed Authorized By		46B. Towed By		47B. Towed To		210A								88																
Owner		Driver		N/A		Owner		Driver		N/A		210A								88																

48A. Alcohol / Drug Test Given:		Crash Diagram		48B. Alcohol / Drug Test Given:		210B	
No		RT 139 East		No		88	
Test Type:		←		Test Type:		220A	
Breath		←		Breath		-	
Blood		←		Blood		220B	
Urine		←		Urine		-	
Test Results:		RT 139 West		Test Results:		230A	
Pending		→		Pending		6	
0 %		→		Pending		230B	
0 %		→		Pending		-	
49A. Vehicle 1 Initial Travel Direction		50. Grid Map No.		49B. Vehicle 2 Initial Travel Direction		230C	
North		N/A		North		6	
East		N/A		East		230D	
South		N/A		South		10	
West		N/A		West		240A	
53. No. of Vehicles		54. No. of Injured		55. Work Zone Related		240B	
2		0		No		6	
56. Crash Description		Head On		56. Crash Description		240C	
Rear End		Side Swipe		Side Swipe		10	
Right Angle		Left / U Turn		Backling		250A	
Fixed Obj.		Non-Fix Obj.		Over Turn		-	

*****See Reverse Side*****

57. Veh. No.	58. Age	59. Pos.	60. Safety Device	61. Eject	62. Injury Severity	63. M/F	64. Injury Area	65. Taken By	66. Taken To	67. Name and Address of All Vehicle Occupants or Pedestrians - if Deceased, include Date & Time of Death	68A. Refused Medical
A	1	26	1	99	1	5	M	-	-	Michael Miele Jr. 114 Knoll Terr West Caldwell, NJ 07006	68A. Refused Medical
B	1	54	3	99	1	5	F	-	-	Valarie M Miele 114 Knoll Terr West Caldwell, NJ 07006	68B. Refused Medical
C	1	27	4	99	1	5	F	-	-	Felicia N Cozze 519 Central Ave Apt 4 Jersey City, NJ 07307	68C. Refused Medical

**JUNE 06, 2015 ACCIDENT REPORT
JERSEY CITY, NJ**

EXHIBIT D

THE PORT AUTHORITY OF NY & NJ

MOTOR VEHICLE CRASH REPORT

PA0621/08-10

1. Motor Vehicle Crash No.	2. Date of Crash	3. Date Reported	4. Facility	5. Police Command	Reference No. (Engineering Use)	Page
	06-06-2015	06-06-2015	HT	HT		1 of 2

56. Crash Description (cont.)

At the above date, time, and place of occurrence the undersigned was assigned to post Relief1. At approximately 1500 hours, the undersigned received reports of a motor vehicle accident at RT 139 west bound covered roadway. The undersigned collected statements and information from both drivers, no injuries reported and extensive property damage to the vehicles.

The driver of vehicle 1 stated while stopped in traffic he heard a loud screeching sound from behind him and then noticed vehicle 2 attempting the brake. Vehicle 2 then started to fishtail out of control; suddenly the driver side door of vehicle 2 struck the rear bumper of vehicle 1 causing significant damage to the rear bumper.

The driver of vehicle 2 stated while driving straight she noticed the cars ahead of her stopped. When the driver of vehicle 2 attempted to brake, she noticed that the brakes did not work. Driver of vehicle 2 attempted to slow the vehicle by turning the wheel. Vehicle 2 then lost control causing it to fishtail. The front end of vehicle 2 hit the barrier causing damage to the front bumper and hood, and the driver side door struck vehicle 1 causing damage to the front driver side door, rear driver side door, and front fender of vehicle 2.

	57. Veh No.	58. Age	59. Pos	60. Safety Device	61. Eject	62. Injury Severity	63. M/F	64. Injury Area	65. Taken By	66. Taken To	67. Name and Address of All Vehicle Occupants or Pedestrians - If Deceased, Include Date & Time of Death	68. <input type="checkbox"/> Refused Medical
D	2	19	1	99	1	5	F	-	-	-	South Orange, NJ	<input checked="" type="checkbox"/> Refused Medical
E												<input type="checkbox"/> Refused Medical
F												<input type="checkbox"/> Refused Medical
G												<input type="checkbox"/> Refused Medical
H												<input type="checkbox"/> Refused Medical
I												<input type="checkbox"/> Refused Medical
J												<input type="checkbox"/> Refused Medical
K												<input type="checkbox"/> Refused Medical

69. Name, Address, and Phone Number of All Witnesses

Witness Name	Address (Number, Street, City, State, Zip)	Phone No.
Witness Name	Address (Number, Street, City, State, Zip)	Phone No.
Witness Name	Address (Number, Street, City, State, Zip)	Phone No.
Witness Name	Address (Number, Street, City, State, Zip)	Phone No.

USE FOR COMMERCIAL VEHICLES

71A. Vehicle No.	70A. HazMat Placard Displayed <input type="checkbox"/> No <input type="checkbox"/> Yes	71A. HazMat Released <input type="checkbox"/> No <input type="checkbox"/> Yes	72A. HazMat 4-dgt ID No.	71B. Vehicle ID.	70B. HazMat Placard Displayed <input type="checkbox"/> No <input type="checkbox"/> Yes	71B. HazMat Released <input type="checkbox"/> No <input type="checkbox"/> Yes	72B. HazMat 4-dgt ID No.
73A. HazMat 1-dgt Class No.	74A. Permits (check all that apply) <input type="checkbox"/> Over dimension <input type="checkbox"/> Overweight	75A. Gross Vehicle Weight (check only one) <input type="checkbox"/> ≤ 10,000 lbs <input type="checkbox"/> 10,001-25,000 lbs	73B. HazMat 1-dgt Class No.	74B. Permits (check all that apply) <input type="checkbox"/> Over dimension <input type="checkbox"/> Overweight	75B. Gross Vehicle Weight (check only one) <input type="checkbox"/> ≤ 10,000 lbs <input type="checkbox"/> 10,001-25,000 lbs		
76A. Commercial Carrier Name	<input type="checkbox"/> N/A	77A. Carrier No. <input type="checkbox"/> USDOT <input type="checkbox"/> Other	76B. Commercial Carrier Name	<input type="checkbox"/> N/A	77B. Carrier No. <input type="checkbox"/> USDOT <input type="checkbox"/> Other		

USE FOR PORT AUTHORITY VEHICLES ONLY

21A. Vehicle No.	78A. PA Vehicle No.	79A. PONYA Plate No.	21B. Vehicle No.	78B. PA Vehicle No.	79B. PONYA Plate No.
80A. PA Employee No.	81A. Driver Unit No.		80B. PA Employee No.	81B. Driver Unit No.	

① 201-653-2857



770 Toninelle Avenue (Rt. 1-9)
 Corner North Street
 Jersey City, NJ 07307

DATE 6-6-15		TIME	A.M. P.M.	REQUESTED BY
LOCATION OF VEHICLE S STOP				
NAME			PHONE	
ADDRESS			ZIP	
MILEAGE				2nd Truck
START	FINISH	NUMBER		
		DRIVER		
YEAR	MAKE/MODEL/COLOR		DRIVER	
11	Lincoln			
STATE	LIC. NO.			
<input type="checkbox"/> SLING/HOIST TOW <input type="checkbox"/> WHEEL LIFT <input checked="" type="checkbox"/> FLAT BED/RAMP <input type="checkbox"/> START <input type="checkbox"/> LOCK OUT		<input type="checkbox"/> FLAT TIRE <input type="checkbox"/> OUT OF GAS <input checked="" type="checkbox"/> M.V.A. <input type="checkbox"/> G.O.A. <input type="checkbox"/> _____		SPECIAL EQUIPMENT <input type="checkbox"/> SINGLE LINE WINCHING <input type="checkbox"/> DUAL LINE WINCHING <input type="checkbox"/> SNATCH BLOCKS <input type="checkbox"/> SCOTCH BLOCKS MILES
VEHICLE TOWED TO				
PO OK #		Admin		
		WARRANTAGE		
		4500		
Beware of		TOWING CHARGE		
		LABOR CHARGE		
Brake - Pedal		STORAGE CHARGE 22500		
		YARD 5000		
OPERATOR'S SIGNATURE [Redacted]		TAX 1575		
		TOTAL 33575		
AUTHORIZED SIGNATURE				

road service

CAR IS
 IN Service!

LINCOLN

LINCOLN

Upper Marlboro, MD Phone (H) [Redacted] Phone (W) [Redacted] Phone (C) [Redacted] Phone Oth: [Redacted] Email: [Redacted] Year/Make/Model: 2013 Lincoln MKZ VIN: 3LN6L2G92 DR [Redacted] License Number: [Redacted] MD Color: Red Stock Number: [Redacted] Mileage In: 14040 Tag Number: [Redacted] Mileage Out: 0	A/R Number: [Redacted] Customer Number: [Redacted] PO Number: [Redacted] Auth Number: [Redacted] Service Writer: 0883 Estimate Amount: \$ 3886.68 Terms & Conditions: Type of Sale: Retail Customer Signature	Inv. Num [Redacted] Printed: OCT 6 16 4:09 PM Copy # 1 Date Opened: 09/14/16 Date Notified: Date Delivered: Date Complete: 10/06/16
--	---	---

Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total
-------------	--------	---------	-------	-----------	-------------

1. Customer statement of problem

REPAIR PER ESTIMATE

Q -
 1 -- Correction/Action Taken

Part Number	Failed	Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total
EP5Z17D957CPTM		COVER	1	1	736.87	736.87	
DP5Z17A385AA		BRACKET LICENSE PLATE	1	1	69.80	69.80	
\$V15937-321		FENDER	1	1	281.25	281.25	
\$V15937		DOOR ASSY	1	1	572.00	572.00	
<u>Sub Total Parts</u>						1659.92	
SubTotal Job # 1						2835.92	1176.00

2. Customer statement of problem

PAINT TIME

Z -
 1 -- Correction/Action Taken

<u>Sub Total Parts</u>	652.00
SubTotal Job # 2	0.00
	652.00

Miscellaneous Charges and Deductions For All Jobs
 Paint and Mat

CHARGE
 TYPE: Vis A
 AMOUNT: 3,886.68
 DATE: 1-8-17 BY: me
 282.23

NOT RESPONSIBLE FOR LOSS OR DAMAGE TO CARS OR ARTICLES LEFT IN CARS IN CASE OF FIRE, THEFT OR ANY OTHER CAUSE BEYOND OUR CONTROL.

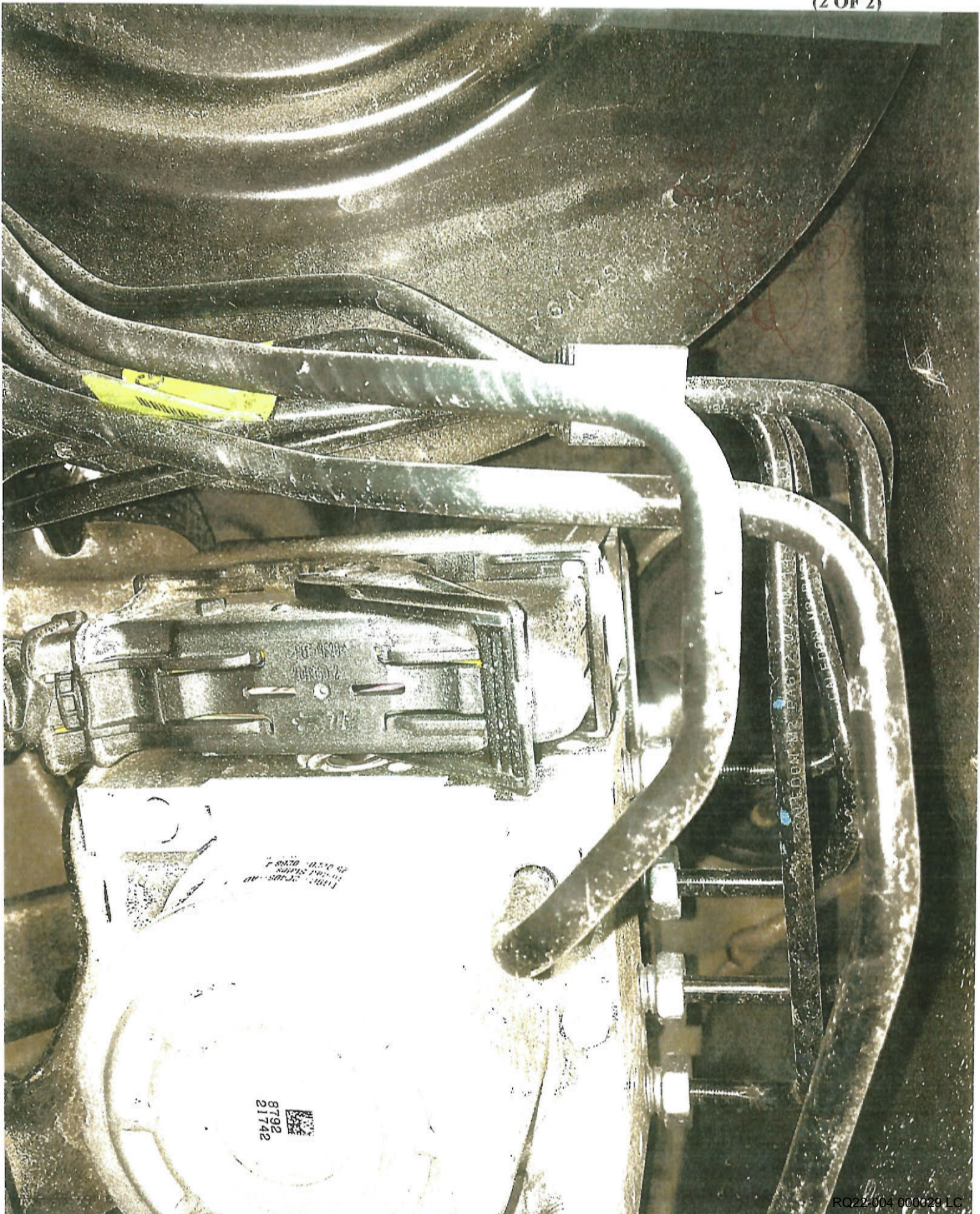
I hereby authorize the repair work hereinafter set forth to be done along with the necessary materials and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is acknowledged on above car or truck to secure the amount of repairs thereto. I further authorize EAST WEST LINCOLN MERCURY to repair my auto per insurance company estimate, including any supplementary claims and I hereby assume personal liability for payment on full for any and all work done on said motor vehicle.

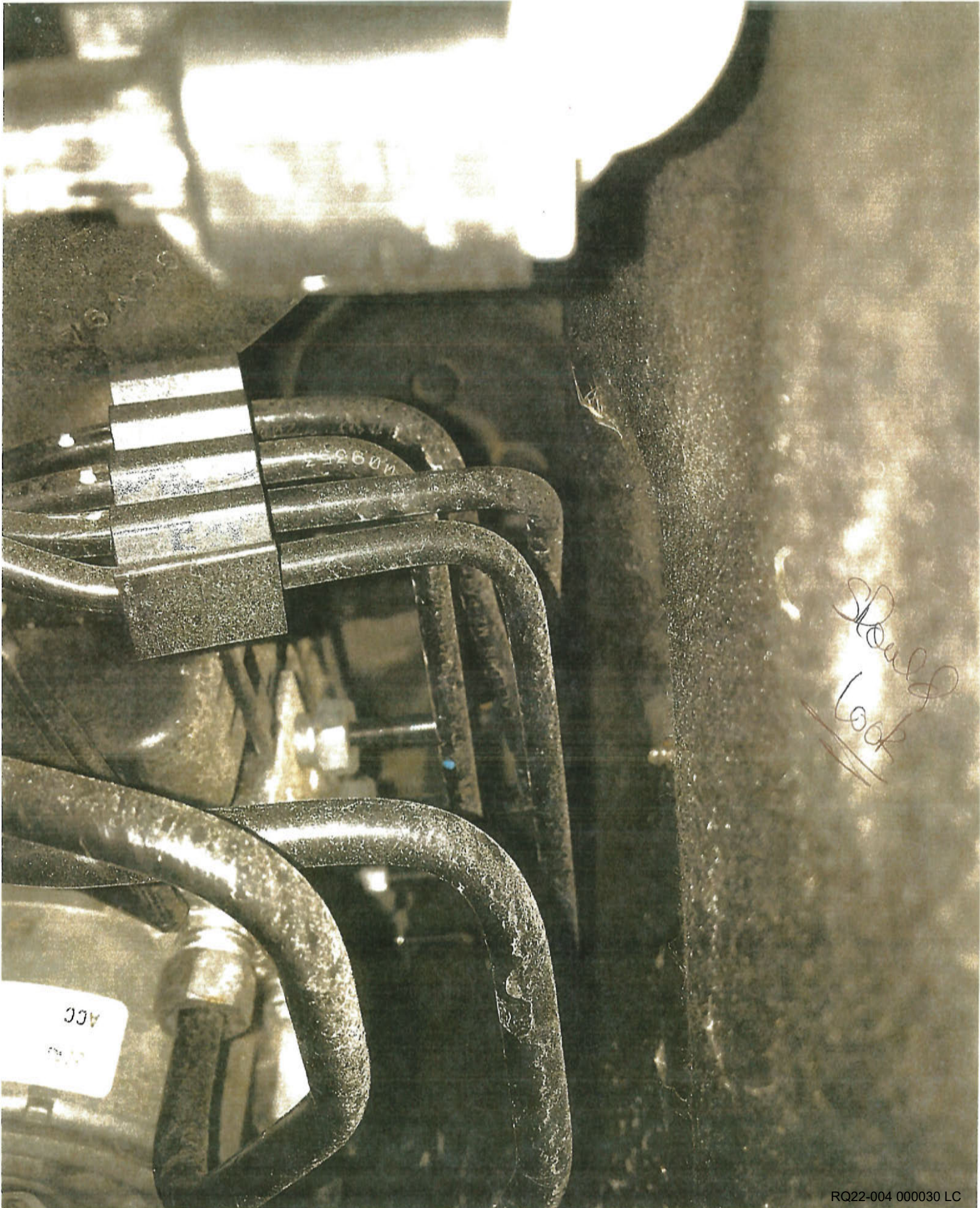
STATEMENT OF DISCLAIMER
 The factory warranty constitutes ALL of the warranties with respect to the sale of this item/items. Seller hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/items.

I acknowledge receipt of the parts and labor listed below. On behalf of servicing dealer, I hereby certify that the information contained hereon is accurate unless otherwise shown. Services described were performed at no charge to owner. There was no indication from the appearance of the vehicle or otherwise, that any part repaired or replaced under this claim had been connected in any way with any accident, negligence or misuse. records supporting this claim are available for (1) year from the date of payment notification at the servicing dealer, for inspection by manufacturer's representative.

Total Labor	1,828.00
Total Parts	1,659.92
Total Sublet	0.00
Misc. Chrgs	282.23
Car Rental	0.00
Freight	0.00
Deductible	0.00
Special Tax	0.00
Haz Mat Chrg	0.00
Sales Tax	116.53
AMOUNT DUE	3,886.68







ALL INFORMATION IS CONFIDENTIAL
 OK 3.35.17 Jan 17

EAST WEST
 7591 Annapolis Road
 Landover Hills, MD 20784
 (301) 459-1750
 www.eastwestlm.com

EXHIBIT I

LINCOLN

LINCOLN Page 1

Upper Marlboro, MD Phone (H) [REDACTED] Phone (W) [REDACTED] Phone (C) [REDACTED] Phone Oth: [REDACTED] Email: [REDACTED]	A/R Number: Customer Number: [REDACTED] PO Number: Auth Number: Service Writer: 8813 Estimate Amount: \$ 1588.17 Terms & Conditions: Type of Sale: Retail	Inv. Num [REDACTED] Printed: JAN 3 17 4:45 PM Copy # 1 Date Opened: 12/20/16 Date Notified: 01/03/17 Date Delivered: Date Complete:
Year/Make/Model: 2013 Lincoln MKZ VIN: 3LN6L2G92 DR [REDACTED] License Number: [REDACTED] MD Color: Red Stock Number: [REDACTED] Mileage In: 14045 Tag Number: [REDACTED] Mileage Out: 14045	Customer Signature	

Description	QtyOrd	Qty Del	Price	Ext Total	Grand Total
-------------	--------	---------	-------	-----------	-------------

1. Customer statement of problem
 CHECK BRAKES LOCKING UP

1 -- Correction/Action Taken

DIAG BRKIND SYSTEM, FOUND BRAKE LINES TO ABS MODULE
 HYDRAULIC CONTROL MODULE NOT IN PROPER LOCATION,
 REPLACE CONTROL MODULE AND REROUTE 6 BRAKE LINES
 AND BLEED SYSTEM, ROAD TEST EVERYTHING WORKS NORMAL
 NOW. MACHINE ROTORS HAD HOT SPOTS IN REAR

1087.58

Part Number	Failed	Description	QtyOrd	Qty Del	Price	Ext Total
DG9Z2C405J		UNIT ASY CONTROL	1	1	460.35	460.35
PM20		FLUID BRAKE	1	1	11.90	11.90

Sub Total Parts 472.25
 SubTotal Job # 1 1559.83

Miscellaneous Charges and Deductions For All Jobs

CHARGE
 TYPE: VISA
 AMOUNT: 188.17
 DATE: 5.17 BY: ME

PAID
 CK. NO. 1200
 DATE 5-17-17
1,400.00

\$ 5474.85

NOT RESPONSIBLE FOR LOSS OR DAMAGE TO CARS OR ARTICLES LEFT IN CARS IN CASE OF FIRE, THEFT OR ANY OTHER CAUSE BEYOND OUR CONTROL.

I hereby authorize the repair work hereinafter set forth to be done along with the necessary materials and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is acknowledged on above car or truck to secure the amount of repairs thereto. I further authorize EAST WEST LINCOLN MERCURY to repair my auto per insurance company estimate, including any supplementary claims and I hereby assume personal liability for payment on full for any and all work done on said motor vehicle.

Total Labor	1,087.58
Total Parts	472.25
Total Sublet	0.00
Misc. Chrgs	0.00
Car Rental	0.00
Freight	0.00
Deductible	0.00
Special Tax	0.00
Haz Mat Chrg	0.00
Sales Tax	28.34

AMOUNT DUE 1,588.17

STATEMENT OF DISCLAIMER

The factory warranty constitutes ALL of the warranties with respect to the sale of this item/items. Seller hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/items.

I acknowledge receipt of the parts and labor listed below. On behalf of servicing dealer, I hereby certify that the information contained hereon is accurate unless otherwise shown. Services described were performed at no charge to owner. There was no indication from the appearance of the vehicle or otherwise, that any part repaired or replaced under this claim had been connected in any way with any accident, negligence or misuse. records supporting this claim are available for (1) year from the date of payment notification at the servicing dealer for inspection by manufacturer's representative.

**ITEMIZED/PROJECTED EXPENSES
RESULTING FROM DEFECTIVE BRAKES
OF 2013 LINCOLN MKZ
VIN: 3LN6L2G92 DR [REDACTED]**

Date	Item	Amount
05-05-15	Payment for on-campus collision – Rutgers, New Brunswick, NJ - Exhibit C	\$ 600.00
06-06-15	Towing and storage - My Way Towing, Newark, NJ Exhibit E	235.75
09-14-16	Towing from NJ to East West Lincoln, Maryland	600.00
01-05-17	East West repairs to body damage (not covered by ins.) Exhibit F	3886.68
01-05-17	East West repairs to brakes (not covered by ins.) Exhibit I	1588.17
02-08-17	Loss of service of car for 21 months – payments of \$685.04/month x 21	14385.84
02-08-17	Alternate transportation for Brittany – payment of approximately \$300.00/month x 21	6300.00
02-08-17	Retainer fee for an attorney for this matter	1500.00
Projected	Counseling/safe driving classes for Brittany	1275.00
Projected	Three year surcharge on auto insurance for Brittany because of accidents caused by defective brakes (est. 300/month x12 x 3)	10800.00
Projected	Loss of employment at Hooters by Brittany because subject vehicle provided unreliable transportation (est. 1500.00/mo. x 19 months)	28500.00
02-10-17	TOTAL OF ITEMIZED/PROJECTED EXPENSES	69,671.44



From: [Ordcalp, F \(F.\)](#)
To: [Clark, Jessica \(J.E.\)](#)
Subject: FW: Dealer/Fleet Request for OGC Review
Date: Tuesday, June 18, 2019 8:08:30 PM

From: DCPFORM, FMCDealer (.)
Sent: Tuesday, June 18, 2019 8:08:29 PM (UTC-05:00) Eastern Time (US & Canada)
To: Ordcalp, F (F.)
Cc: erich@fordofupland.com
Subject: Dealer/Fleet Request for OGC Review

Dealer/Fleet Request for OGC Review

DEALER INFORMATION:

Dealership Fleet Name: Ford of Upland
Requesting Dealer Fleet: ford of upland
PA Code: 08393
Contact Person: eric heronime
Title: service manager
Phone Number: 9099465555 x7511
Fax Number:
Email: erich@fordofupland.com
Region: a05
Address: 555 w foothill
City: upland
State: California
Zip Code: 91786

CUSTOMER VEHICLE INFORMATION:

Warranty Start Date: 2-24-15
Vehicle Year: 2015
Vehicle Model: fusion
Vehicle VIN: 3FA6P0H77FR [REDACTED]
Mileage: 46614
customer Fleet Name: [REDACTED]
Street Address: [REDACTED]
City : ontario
State : California
Zip Code : [REDACTED]
Home Phone: [REDACTED]
Work Phone: [REDACTED]
Customer Email: [REDACTED]
Customer Region: a05

DETAILS OF INCIDENT:

Fire
Date of Incident: 2019-05-28
County incident occurred: san bernardino

Is customer alleging a component defect CAUSED the incident? YES

Details: brake line failed and leaked fluid to hot exhaust manifold causing fire

Was a police report filed? NO

Details : na

Has the insurance company been contacted? NO

Insurance company advised: na

Insurance company contact information: na

Coach builder: no

City : na

State :

Zip Code : na

Vehicle Location: ford of upland

Attorney information: na

CVO Contact: na

Resolution Customer is seeking: pay for repairs and rental

Comments: call eric heronime at dealer

This email was automatically generated. Please do not reply to this email. No one monitors the inbox for this email address.

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Server: AWS Prod
 Claims loaded through: 25-SEP-2019

Claim Detail Report

Note: All costs are in US dollars

Model Year = 2015; Claim Key = [REDACTED]

Vehicle Information

Model Year: 2015
 Market Derived: F - FORD
 Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LITE
 Version/Series: C/DB-SERIES 10
 Drive Type: C/A-2 WHIL, L/H FRONT DRIVE
 Vehicle Line: C/C7-CD391N FUSION [13-20]
 WERS Engine Code: C/S7-2.5L DOHC PFI 4 CYL GAS
 WERS Transmission Code: C/W6-6 SPD AUTO TRANS 6F MID-RANGE
 Warranty Start Date: 24-FEB-2015
 Production Date: 30-JAN-2015
 VIN: 3FA6P0H177ER [REDACTED]

Claim Information

Document Number: [REDACTED]
 Repair Date: 28-MAY-2019
 Distance: 46614
 TIS: 52
 FCC Auth: G
 AWS Load Date: 18-SEP-2019
 Transaction Code: 0968D

Dealer Information

Dealer Name: FORD OF UPLAND
 Dealer Code: 08393 - *
 Address: 555 W. FOOTHILL BLVD.
 City: UPLAND
 State: CA Zip Code: 917863853
 Country: USA Region Code: NA
 Phone: (909)946-5555

Expense Information

Customer Paid Amount: .00
 Deductible Amount: 100.00
 Dealer Paid Amount: .00
 Labor Cost: 222.30
 Misc. Expense Amount: 129.30
 Part Markup Amount: 34.30
 Material Cost: 120.03
 Total Cost Gross: 471.63

Cust. Concern Code: I.63 - BRAKE FLUID LEAK

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: RACK AND INSPECTED FRONT AND REAR BRAKES FOR FLUID LEAK. FOUND BOTH FRONT BRAKE CALIPER HOSES AND LEAKING ONTO THE CATALYTIC CONVERTER CAUSING A FIRE. REPLACED BOTH FRONT CALIPER HOSES AND BLED. REPLACED DAMAGED VACUUM BRAKE TUBE AT BOOSTER AND PERFORMED POST REPAIR ROAD TEST

Customer Comment: CUSTOMER STATES THAT THE BRAKES ARE GOING TO THE FLOOR AND YOU CAN SEE BRAKE FLUID LEAKING FROM THE DRIVER SIDE

<u>Labor Op Code</u>	<u>Labor Op Description</u>	<u>Labor Op Cost</u>
2001BXQ		23.40
2078AFT	HOSE - BRAKE REPLACE	93.60
MT9C490		105.30

Causal	Reported Part Number				Engineering Part Number				Part	Part Replaced	Extended		
Flag	PREF	BASE	SUFF	Description	PREF	BASE	SUFF	Description	CPSC	Quantity	Type Code	Indicator	Amount
N	DG9Z	2078	F	HOSE ASY-BRAKE	DG9Z	2078	F	HOSE ASY-BRAKE	060603	1	FS	Y	14.62
N	DG9Z	2078	C	HOSE ASY-BRAKE	DG9Z	2078	C	HOSE ASY-BRAKE	060603	1	FS	Y	15.18
N	*	W711784	S300		*	W711784	S300		*	4	FS	Y	16.80
N	PM	20	*		PM	20	*		*	2	MU	Y	17.92

N	DS7Z	9C490	AC	MANIFOLD- VACUM OUTLE POSITIVE	DS7Z	9C490	AC	MANIFOLD- VACUM OUTLE POSITIVE	160201	1	FS	Y	42.91
N	BT4Z	14450	BA	CABLE TERMINAL BOOSTER	BT4Z	14450	BA	CABLE TERMINAL BOOSTER	1801XX	1	FS	Y	12.60
Y	*	2005	*	ASY- POWER BR	*	2005	*	ASY- POWER BR	060701	0	FS	N	.00

DTC Sections: Mil. Light On = *

Flag Test Type Malfunction Cd Malfunction Cd Description Monitor Cd Monitor Cd Description

Any comments? You can contact

webmaster

Server: AWS Prod
 Claims loaded through: 29-JAN-2020

Claim Detail Report

Note: All costs are in US dollars

Model Year = 2015; Claim Key = [REDACTED]

Vehicle Information

Model Year: 2015
 Market Derived: F - FORD
 Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LITE
 Version/Series: C/DB-SERIES 10
 Drive Type: C/A-2 WHL L/H FRONT DRIVE
 Vehicle Line: C/C7-CD391N FUSION [13-20]
 WERS Engine Code: C/S7-2.5L DOHC PFI 4 CYL GAS
 WERS Transmission Code: C/W6-6 SPD AUTO TRANS 6F MID-RANGE
 Warranty Start Date: 24-FEB-2015
 Production Date: 30-JAN-2015
 VIN: 3FA6P0H17FR [REDACTED]

Claim Information

Document Number: [REDACTED]
 Repair Date: 28-MAY-2019
 Distance: 46614
 TIS: 52
 FCC Auth: G
 AWS Load Date: 18-SEP-2019
 Transaction Code: 0968D

Dealer Information

Dealer Name: FORD OF UPLAND
 Dealer Code: 08393 - *
 Address: 555 W. FOOTHILL BLVD.
 City: UPLAND
 State: CA Zip Code: 917863853
 Country: USA Region Code: NA
 Phone: (909)946-5555

Expense Information

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 Deductible Amount: 100.00
 Dealer Paid Amount: .00
 Labor Cost: 222.30
 Misc. Expense Amount: 129.30
 Part Markup Amount: 34.30
 Material Cost: 120.03
 Total Cost Gross: 471.63

Cust. Concern Code: L63 - BRAKE FLUID LEAK

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: RACK AND INSPECTED FRONT AND REAR BRAKES FOR FLUID LEAK. FOUND BOTH FRONT BRAKE CALIPER HOSES AND LEAKING ONTO THE CATALYTIC CONVERTER CAUSING A FIRE. REPLACED BOTH FRONT CALIPER HOSES AND BLED. REPLACED DAMAGED VACUUM BRAKE TUBE AT BOOSTER AND PERFORMED POST REPAIR ROAD TEST

Customer Comment: CUSTOMER STATES THAT THE BRAKES ARE GOING TO THE FLOOR AND YOU CAN SEE BRAKE FLUID LEAKING FROM THE DRIVER SIDE

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N	*	W711784	S300		*	W711784	S300		*	4	FS	Y	16.80
N	PM	20	*		PM	20	*		*	2	MU	Y	17.92

N	DS7Z	9C490	AC	MANIFOLD- VACUM OUTLE POSITIVE	DS7Z	9C490	AC	MANIFOLD- VACUM OUTLE POSITIVE	160201	1	FS	Y	42.91
N	BT4Z	14450	BA	CABLE TERMINAL BOOSTER	BT4Z	14450	BA	CABLE TERMINAL BOOSTER	1801XX	1	FS	Y	12.60
Y	*	2005	*	ASY- POWER BR	*	2005	*	ASY- POWER BR	060701	0	FS	N	.00

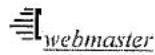
DTC Sections: Mil. Light On = *

Flag Test Type Malfunction Cd Malfunction Cd Description Monitor Cd Monitor Cd Description

Attachments

No attachment records, [click here](#) to force check EDMS.

Any comments? You can contact



Roquemore, Tanya (T.)

From: Eric Heronime <erich@fordofupland.com>
Sent: Monday, July 22, 2019 10:53 AM
To: Roquemore, Tanya (T.)
Subject: Re: [REDACTED]
Attachments: 20190722_074244.jpg; 20190722_074247.jpg

PART NUMBER NEEDED FGZ12A581K WIRE ASY PART TOTAL 567.18 LABOR 1190.00.
THE RIGHT FRONT BRAKE LINE BURST CAUSING BRAKE FLUID TO SPRAY ONTO CAT WHILE DRIVING CAUSING A
FIRE UNDER THE HOOD DAMAGING THE MAIN ENGINE HARNESS. THIS CONCERN IS RELATED TO A DEFECT IN
THE BRAKE LINE CAUSING IT TO BURST.

ERIC HERONIME
SERVICE MANAGER
(909)204-7514

OUR GOAL IS TO PROVIDE 5 STAR SERVICE

From: Roquemore, Tanya (T.) <troquemo@ford.com>
Sent: Wednesday, June 26, 2019 8:19:45 AM
To: Eric Heronime <erich@fordofupland.com>
Subject: FW: [REDACTED]

CAUTION: This email originated from outside of the organization. Do not click links, open attachments or
reply unless you recognize the sender and know the content is safe.

Eric

See the first request for information regarding [REDACTED] and the
2015 Fusion below.

Thank You

*Tanya Roquemore
Product Claims Analyst
Office of the General Counsel
Telephone: 313/845-5539
E-Fax: 866/629-3804*

PRIVILEGED AND CONFIDENTIAL

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

From: Roquemore, Tanya (T.)
Sent: Wednesday, June 19, 2019 11:45 AM
To: 'erich@fordofupland.com' <erich@fordofupland.com>
Subject: [REDACTED]
Importance: High

Eric

I am responding to your dealer request regarding [REDACTED]

Can you please provide the following information:

Photographs of the vehicle including other property damage if any,

Estimate of the repair to be performed or if already performed provide the repair order with the dollar amount and If possible, verification that the insurance company is not involved.

Thank You

*Tanya Roquemore
Product Claims Analyst
Office of the General Counsel
Telephone: 313/845-5539
E-Fax: 866/629-3804*

PRIVILEGED AND CONFIDENTIAL

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







Law Offices of Michael A. Saunders

1901 First Avenue, First Floor

San Diego, CA 92101

Fax (858) 272-9009

(619) 992-5872

lemonlaw99@gmail.com

June 26, 2019

Ford Motor Company
Office of the General Counsel
World Headquarters
The American Road
0406-E5
Dearborn, Michigan 48126-25

Email: ogcclaim@ford.com

Re: [REDACTED] vs **Ford Motor Company**

Our Client: [REDACTED]

Vehicle: 2016 Ford Fusion SE

VIN: #3FA6P0HD6GR [REDACTED]

Dear Sir or Madam:

Please be advised 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.

My client was understandably excited about his elegant new Ford Fusion, feeling he had made a quality choice for his driving needs and enjoyment. My client's anticipation and excitement, however, quickly turned to disappointment and frustration due to numerous unsuccessful repair attempts, which have substantially impaired the vehicle to him. This is not what my client was promised nor bargained-for when he purchased his new vehicle.

As you are undoubtedly aware, under the Song-Beverly Consumer Warranty Act, when a motor vehicle is sold with a "substantial, material impairment in use, value and safety" and a reasonable number of attempts have been made to repair the defects, the consumer must be reimbursed or the vehicle replaced, *See* [REDACTED] v. American Honda Motor Co. (1985) 34 Cal.App.4th 1242; Cal. Civ. Code §1793.22(e)(1).

The vehicle was purchased with a 36,000 Mile Warranty and falls well within the provisions of the Song-Beverly Consumer Warranty Act. Cal. Civ. Code §1793.22(e)(2); See [REDACTED] v. BMW of North America, Inc. (1995) 35 Cal.App.4th 112.

My client purchased his new Ford for the comfort, safety and reliability, which are the trademarks of owning a new vehicle. When he took possession of his new Ford Fusion, he believed he was getting a new vehicle with all of these attributes. In light of the events since then, however, he feels, in essence, he never had the opportunity to enjoy the pleasure of owning a new vehicle.

There were numerous non-conformities with my client's automobile for which relief is sought, and numerous attempts to repair the vehicle have been unsuccessful. There were also numerous violations of State and Federal law in connection with the delivery and/or repair of the aforementioned vehicle. The primary non-conformities and violations include, but are not limited to:

***Jan. 16 – Mar. 31, 2018 – (60+ Days in shop) Mileage – 32,880 RO # [REDACTED]**

Defect: Customer states when going into second or third gear the vehicle jumps/quick shift change.
Repair: Unable to duplicate at this time.
Defect: Customer states trunk is leaking when going through car wash.
Repair: Body shop- welded and repainted.
Defect: Customer states sunroof is leaking
Repair: replaced sunroof track and headliner

****Feb. 26 – 28, 2018 Mileage – 32,890 RO # [REDACTED]**

Defect: Customer states navigation SD card is not recognized at times.
Repair: Replaced navigation SD card with latest A8 version

*****Mar. 30-31, 2018 Mileage – 35,481 RO # [REDACTED]**

Defect: Customer states clanking noise coming from front of vehicle.
Repair: Removed transmission to inspect. Found flexplate/flywheel broken.
Removed and replaced flexplate/flywheel & bolts. Reinstalled transmission with new hardware.

April 12 – 24, 2018 – (12 Days in shop) Mileage – 37,129 RO # [REDACTED]

Defect: Customer states transmission is jumping into second gear.
Repair: Unable to duplicate or verify.
Defect: Customer states clicking noise coming from engine area
Repair: Unable to verify.

June 11 – 15, 2018 – (5 Days in Shop) Mileage – 40,317 RO # [REDACTED]
Defect: Customer states there is a ticking noise at idle coming from engine area.
Repair: Verified concern. Removed and replaced EVAP Purge Valve Assembly.

Dec. 5 – 26, 2018 – (21 Days in Shop) Mileage – 47,209 RO # [REDACTED]
Defect: Customer states hearing abnormal sound – told elsewhere it was from flywheel which had been repaired on 3/18.
Repair: Removed transmission, found flexplate broken and at fault for knocking noise. Torque converter Hub also damaged, and pump bushing scored. Disassembled and reassembled transmission after replacing filter and pump. Replaced Torque converter and flexplate with new bolts.

Jan. 23, 2019 – Mileage – 50,344 RO # [REDACTED]
Defect: Customer states outside shop told him brake line was snapped.
Repair: Will return for other concerns after brake line is repaired.
Defect: Customer states check engine light on
Repair: Circuit breaker assembly. Replaced fuses.
Defect: Customer states vehicle clunks into gear from park to drive.
Repair: Customer left – no work performed.

April 30 – June 4, 2019 – (35 Days in Shop) Mileage – 59,070 RO # [REDACTED]
Defect: Customer states vehicle is losing coolant excessively and white smoke comes out of tailpipe.
Repair: Verified concern. Installed new long block and cooler and transferred all necessary components replaced all necessary gaskets and seals. Also replaced turbo tube due to damage from removing old engine.

Based on this extraordinary repair history, my client understandably has lost confidence in this vehicle. As Ford Motor Company is aware, my client is not required to live with this problematic vehicle and is herein demanding his entitlement under the Song-Beverly Consumer Warranty Act (the "Lemon Law"), Cal. Civ. Code §1790 et seq., which provides:

If the manufacturer or its representative in this state is unable to service or repair a new motor vehicle... to conform to applicable express warranties after a reasonable number of attempts, the manufacturer shall either promptly replace the new 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 an 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..."

Cal. Civ. Code §1793.2(d)(2) (emphasis added).

The Lemon Law goes on to state:

(a) Any buyer of consumer goods who is damaged by a failure to comply with an 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.

(b) 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 attorney's fees, determined by the court to have been reasonably incurred by the buyer in connection with the commencement and prosecution of such action.

Cal. Civ. Code § § 1794 (emphasis added).

In light of the facts of this case as applied to the Lemon Law, there is no doubt Ford Motor Company is obligated to make restitution to my client for the "lemon" which was sold to him. In light of the facts of this case where 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.

Clearly, the persistence of the subject-vehicle's various defects, despite the numerous attempts which have been made to repair them, creates the type of problem which constitutes a "substantial, material impairment in the use, value and safety" of my client's vehicle which requires restitution or replacement under Cal. Civ. Code §1791 et seq.

Under the Song-Beverly Act, my client has the choice of taking a replacement vehicle or, if he wishes, he may insist on restitution in this matter. Cal. Civ. Code §1793.2 (d)(2). My client hereby requests repurchase and restitution for his "lemon" as determined by Cal. Civ. Code §1793.2(d)(2)(B).¹

¹Under California Civil Code Section 1793.2(d)(2)(B), the amount of restitution due is "equal to the actual price paid or payable by the buyer, including any charges for transportation and manufacturer installed options, but excluding nonmanufacturer items installed by a dealer or the buyer, and including any collateral charges, such as sales tax, license fees, registration fees, and other official fees, plus any incidental damages."

Our attorneys' fees are minimal at this stage and we would prefer to resolve this matter without the need for any more time spent on our part or on the part of your attorneys. Think of the time, money and effort both sides would save with a quick resolution of this claim.

Please give this demand the serious consideration it deserves. If I do not hear from you, **in writing, by July 26, 2019**, I shall assume Ford Motor Company is denying its obligations under the law and my client will be left with no choice but to initiate legal proceedings. As I am sure you are aware, under the circumstances, the Song-Beverly Consumer Warranty Act provides a consumer shall be awarded reasonable costs and attorney fees if resort to the court system is necessary.

[REDACTED] does not seek anything beyond what he should have received in the first instance... fairness on the part of Ford Motor Company.

Thank you for your anticipated attention to this matter. I trust this will be resolved rapidly.

Very truly yours,

LAW OFFICES OF MICHAEL A. SAUNDERS

[REDACTED]

Michael A. Saunders, Esq.
Attorney for [REDACTED]

Enclosures - Repair Invoices



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R/O Open Date	R/O Number				
1/16/18					
R/O Close Date	Status				
3/31/18	Reprint				
Mileage In	Mileage Out				
32889	32889				
Service Advisor / Tag #					
Sheri Atkins					
Vehicle Identification Number					
3FA6P0HD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

LONG BEACH, [REDACTED]

Work Phone
Home Phone

Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Cell: [REDACTED] Email: [REDACTED]	
#1 - FM Customer Reports: GUEST STATES TRUNK IS LEAKING WHEN GOING THROUGH CAR WASH NO PRIOR APPROVAL NEEDED Caused by: [REDACTED] SEE LINE 2 Tech: Shop Tech (301) BODY SHOP WELDED AND REPAINTED	Warranty
#2 - FM Customer Reports: GUEST STATES SUNROOF IS LEAKING PRIOR AUTH #THIE519623 VIN#1FM5K7D83HG [REDACTED] CONTRACT#2367 --2/15--9 DAYS 9 DAYS RENTAL AUTH # ESPA572681 Caused by: [REDACTED] 9 DAYS RENTAL AUTH # ESPA572681 9 DAYS RENTAL AUTH # ESPA572681 CP: SUNROOF Corrected by OSL: (R09) (D8) OUTSIDE LABOR Tech: Shop Tech (301) Work performed by 90503 : 12660 () Labor: Work performed by 90503 : 12660 () Parts: Work performed by PACRENTAL : 2367 () Installed DS7Z 54500A18 B :GLASS Qty: 1 Installed FS7Z 5451916 BB :HEADLINING - ROOF Qty: 1 Installed HS7Z 5451070 A :KIT - TILTING ROOF Qty: 1 Installed DS7Z 9904132 A :CLIP Qty: 1 REPLACED SUNROOF TRACK AND HEADLINER	Warranty Warranty Warranty Warranty Warranty Warranty Warranty
#3 - FM Customer Reports: GUEST STATES NAVIGATION MEMORY CARD IS NOT RECOGNIZED AT TIMES	

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
EPA #: CAL109269019

P&A Code: 42063
P&A Code: 11846



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R/O Open Date	R/O Number				
1/16/18					
R/O Close Date	Status				
3/31/18	Reprint				
Mileage In	Mileage Out				
32889	32889				
Service Advisor / Tag #					
Sheri Atkins					
Vehicle Identification Number					
3HA6F0HD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

LONG BEACH, [REDACTED]

Work Phone
Home Phone

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Tech: Marco Rodriguez (H65) CUSTOMER TO RETURN	Warranty
#4 - FM Customer Reports: GUEST STATES WHEN GOING INTO SECOND GEAR OR THIRD GEAR VEHICLE JUMPS/QUICK SHIFT CHANGE Caused by CP: NPF Corrected by NPF: (P83) (82) Tech: Ivan Bojorquez (127) PERFORM AUTOMATIC TRANSMISSION DIAGNOSIS. PERFORM ROAD TEST FOR 5 MILES VERIFIED ALL GEARS AND SHIFT POINTS ARE WITHIN SPECS. PERFORM SELF TEST. TEST RESULTS PASSED PCM CMDTC. RUN OASIS AND REVIEW ALL SYMPTOM CODES. FOUND NO TSB OR SSM ASSOCIATED WITH CONCERN AT THIS TIME. UNABLE TO DUPLICATE OR VERIFY CUSTOMER CONCERN AT THIS TIME. NORMAL TRANSMISSION OPERATION IS FELT AT THIS TIME.	Warranty
#5 - FM ESPRENTAL: ESP RENTAL BUDGET RENTAL AS OF 1-16-18 2/7/18 FORD EXPLORER RENTAL LIC#NEW STK# [REDACTED] VIN#1FM5K7D83HG [REDACTED] CONTRACT#2367 --2/15--9 DAYS Tech: Ivan Bojorquez (127)	Warranty
#6 - FM TIRE: PER CALIFORNIA REGULATIONS--WE CHECK TIRE PRESSURE Tech: Ivan Bojorquez (127)	Warranty

Original Estimate \$	Date	Time	LABOR	.00
Additional Cost \$	Date	Time	PARTS	.00
Additional Cost \$	Date	Time	DEDUCTIBLE	.00
TOTAL \$	Date	Time	SUBLET	.00
			SHOP SUPPLIES	.00
			HAZARDOUS MATERIALS	.00
			SALES TAX OR TAX ID.	.00
			SPECIAL ORDER DEPOSIT	.00
			DISCOUNTS	.00
			TOTAL DUE	.00

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Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

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EPA #: CAL109269019

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R/O Open Date	R/O Number
2/26/18	
R/O Close Date	Status
2/28/18	Reprint
Mileage In	Mileage Out
32890	32891
Service Advisor / Tag #	
Sheri Atkins/	

Work Phone			Vehicle Identification Number		
LONG BEACH, CA			3FA6POHD6GR		
Home Phone			Delivery Date		In-Service Date
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Email: AR#: #1 - FM BATT: INSPECT BATTERY AND RECORD RESULTS Corrected by NIP: NO INSPECTION PERFORMED ON THIS VISIT Tech: Luis Rodriguez (B6M)	Warranty
#2 - FM BRK: INSPECT BRAKES AND RECORD RESULTS Corrected by NIP: NO INSPECTION PERFORMED ON THIS VISIT Tech: Luis Rodriguez (B6M)	Warranty
#3 - FM TIRE: PER CALIFORNIA REGULATIONS--WE CHECK TIRE PRESSURE Corrected by NIP: NO INSPECTION PERFORMED ON THIS VISIT Tech: Luis Rodriguez (B6M)	Warranty
#4 - FM-99P: PERFORMED VEHICLE CHECK-UP AND RECORD RESULTS Corrected by NOR: NO RECOMMENDATIONS AT THIS TIME Tech: Luis Rodriguez (B6M)	Warranty
#5 - FM Customer Reports: GUEST STATES NAVIGATION SD CARD IS NOT RECOGNIZED AT TIMES Corrected by SD: (A86) (42) Tech: Luis Rodriguez (B6M) Installed GM5Z 19H449 B (FP): CARD - MEMORY REPLACED NAVIGATION SD CAR WITH LATEST A8 VERSION Qty: 1	Warranty Warranty

Original Estimate \$	Date	Time	LABOR	.00
Additional Cost \$	Date	Time	PARTS	.00
Additional Cost \$	Date	Time	DEDUCTIBLE	.00
TOTAL \$	Date	Time	SUBLET	.00
			SHOP SUPPLIES	.00
			HAZARDOUS MATERIALS	.00
			SALES TAX OR TAX I.D.	.00
			SPECIAL ORDER DEPOSIT	.00
			DISCOUNTS	.00
			TOTAL DUE	.00

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____
 Customer acknowledges a receipt of a copy herof
 Signature X _____ Date _____

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R/O Open Date	R/O Number				
3/13/18					
R/O Close Date	Status				
3/30/18	Reprint				
Mileage In	Mileage Out				
35481	35482				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6P0HD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone	
Home Phone	
LONG BEACH, CA	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Email: AR#: RM0039694	
#1 - FM CUST: CUSTOMER STATES CHECK AND ADVISE GUEST STATES THERE IS A CLANKING NOISE COMING FROM FRONT OF VEHICLE	
Corrected by 6375A: (N50) (42) Automatic Transmission Flywheel and Ring Gear Asse	Warranty
Tech: Shop Tech (301)	Warranty
Tech: Ivan Bojorquez (127)	Warranty
Corrected by 6375AXQ: Extra-Time For A Post-Repair Road Test	
Tech: Ivan Bojorquez (127)	Warranty
Corrected by 1006D: Non Rotational Noise Wireless Electronic Chassis E	
Tech: Ivan Bojorquez (127)	Warranty
Corrected by MTACCESS:	
Tech: Ivan Bojorquez (127)	Warranty
Corrected by 3001A: Caster, Camber, Toe-In Check.	
Tech: Ivan Bojorquez (127)	Warranty
Corrected by 3001A6F: Toe-In Correct.	
Tech: Ivan Bojorquez (127)	Warranty
Installed BE8Z 6379 AB :BOLT - HEX.HEAD Qty: 6	Warranty
Installed W712503 S440 :NUT - HEX. Qty: 2	Warranty
Installed W716200 S437 :STUD Qty: 1	Warranty
Installed W712146 S437 :BOLT Qty: 1	Warranty
Installed W520215 S440 :NUT - HEX. Qty: 2	Warranty
Installed W500545 S439 :BOLT Qty: 2	Warranty
Installed W520214 S442 :NUT - HEX. Qty: 2	Warranty

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
			SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
TOTAL \$	Date	Time	SPECIAL ORDER DEPOSIT
			DISCOUNTS
I acknowledge notice and oral approval of an increase in the original estimated price.			TOTAL DUE

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

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R/O Open Date	R/O Number				
3/13/18					
R/O Close Date	Status				
3/30/18	Reprint				
Mileage In	Mileage Out				
35481	35482				
Service Advisor / Tao #					
Sheri Atkins					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone	
Home Phone	
LONG BEACH, CA	

DESCRIPTION OF SERVICE AND PARTS	QTY	AMOUNT
Installed W715618 S437 :NUT	Qty: 4	Warranty
Installed W716457 S439 :BOLT AND WASHER ASY - HEX.	Qty: 2	Warranty
Installed 4S4Z 3N324 AA :RETAINER - BEARING	Qty: 1	Warranty
Installed W520102 S442 :NUT - LOCKING	Qty: 2	Warranty
Installed XT 10 QLVC :OIL - AUTOMATIC TRANSMISSION	Qty: 2	Warranty
Installed W713478 S439 :BOLT	Qty: 2	Warranty
Installed CV6Z 6375 C (FP) :FLYWHEEL ASY	Qty: 1	Warranty
Installed W716077 S439 :BOLT AND WASHER ASY - HEX.	Qty: 4	Warranty
Installed W713284 S439 :SCREW AND WASHER ASY	Qty: 2	Warranty
PERFORM ROAD TEST VERIFIED LOUD TICKING NOISE. RAN OASIS FOUND NO TSB OR SSM ASSOCIATED WITH CONCERN. M-TIME 1.0 TO HOOK UP WIRED CHASSIS EARS TO AID DIAGNOSIS. PERFORM ROAD TEST AND RAISED VEHICLE AND D PINPOINT NOISE AT AND BETWEEN TRANSMISSION BELLHOUSING AND ENGINE AREA. M-TIME 0.3 TO WORK AROUND CUSTOMERS AFTERMARKET ADD ON WIRING HARNESS FOR ALARM AND SPECIAL LIGHTING. M-TIME 0.3 TO REMOVE CUSTOMER ADD ON AFTERMARKET AIR FILTER HOUSING. M-TIME 0.3 TO REMOVE CUSTOMERS AFTERMARKET WHEELS WITH SPECIAL LUG NUTS REMOVING 10 SPECIAL END CAPS TO GAIN ACCESS TO REMOVE TRANSMISSION TO INSPECT NOISE. FOUND FLEXPLATE/FLYWHEEL BROKEN AND AT FAULT. REMOVE AND REPLACE FLEXPLATE/FLYWHEEL AND BOLTS. REINSTALL TRANSMISSION WITH NEW HARDWARE. PERFORM POST ROAD TEST FOR 5 MILES. VERIFIED REPAIRS. M-TIME 0.3 TO PERFORMED FINAL QUICK TEST PASSED. PERFORMED TOE ALIGNMENT ADJUSTMENT		

#2 -	FM NIP: NO INSPECTION PERFORMED ON THIS VISIT	

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____


Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS


BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
 P&A Code: 11846



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R/O Open Date	R/O Number
3/13/18	
R/O Close Date	Status
3/30/18	Reprint
Mileage In	Mileage Out
35481	35482
Service Advisor / Tag #	
Sheri Atkins/	

Work Phone		Vehicle Identification Number			
LONG BEACH, CA		3FA6POHD6GR			
Home Phone		Delivery Date	In-Service Date		
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Tech: Ivan Bojorquez (127)	Warranty
#3 - FM TIRE: PER CALIFORNIA REGULATIONS WE CHECK TIRE PRESSURE Tech: Ivan Bojorquez (127)	Warranty
#4 * FM ESPRENTAL: ESP RENTAL ADDED OPERATION ENTERPRISE RENTAL AS OF 3-14-18 \$30 PER DAY Tech: Ivan Bojorquez (127)	Warranty
#5 * FM 18S08: CUSTOMER REQUESTED TO HAVE ADDED OPERATION Corrected by 18S08B: REPLACE THE STEERING WHEEL ATTACHMENT BOLT ADDED OPERATION Tech: Luis Rodriguez (B6M) Installed W716575 S437: BOLT AND WASHER ASY -- HEX. Qty: 1 REPLACED THE STEERING WHEEL ATTACHMENT BOLT	Warranty Warranty

Original Estimate \$	Date	Time	LABOR	.00
Additional Cost \$	Date	Time	PARTS	.00
Additional Cost \$	Date	Time	DEDUCTIBLE	.00
TOTAL \$	Date	Time	SUBLET	.00
			SHOP SUPPLIES	.00
			HAZARDOUS MATERIALS	.00
			SALES TAX OR TAX I.D.	.00
			SPECIAL ORDER DEPOSIT	.00
			DISCOUNTS	.00
			TOTAL DUE	.00

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS


BAR #: ARD167486
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P&A Code: 11846



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R/O Open Date	R/O Number				
4/12/18					
R/O Close Date	Status				
4/24/18	Reprint				
Mileage In	Mileage Out				
37129	37130				
Service Advisor / Tag #					
Sheri Atkins /					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone: [REDACTED]

Home Phone: [REDACTED]

Address: LONG BEACH, CA [REDACTED]

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Email: [REDACTED] AR#: RM0039694	
#1 - FM BATT: INSPECT BATTERY AND RECORD RESULTS Corrected by NIP: NO INSPECTION PERFORMED ON THIS VISIT Tech: Ivan Bojorquez (127) Sub Total: Labor: .00 Parts: .00 Total: .00	
#2 - FM BRK: INSPECT BRAKES AND RECORD RESULTS Corrected by NIP: NO INSPECTION PERFORMED ON THIS VISIT Tech: Ivan Bojorquez (127) Sub Total: Labor: .00 Parts: .00 Total: .00	
#3 - FM TIRES: PER CALIFORNIA REGULATIONS WE CHECK TIRE PRESSURE Tech: Ivan Bojorquez (127) Sub Total: Labor: .00 Parts: .00 Total: .00	
#4 - FM 99P: PERFORMED VEHICLE CHECK-UP AND RECORD RESULTS Tech: Ivan Bojorquez (127) Sub Total: Labor: .00 Parts: .00 Total: .00	
#5 - FM Customer Reports: NIGHT DROP-GUEST STATES TRANSMISSION IS JUMPING INTO SECOND GEAR Tech: Ivan Bojorquez (127) Sub Total: Labor: .00 Parts: .00 Total: .00 PERFORM ROAD TEST, VERIFIED ALL GEARS AND SHIFT POINTS ARE WITHIN SPECS PERFORM SELF TEST OBTAINED CODES P0073 AND U0284 IN PCM, CMDTC. UNABLE TO DUPLICATE OR VERIFY CUSTOMERS CONCERN AT THIS TIME	

Original Estimate \$	Date	Time
Additional Cost \$	Date	Time
Additional Cost \$	Date	Time
TOTAL \$	Date	Time

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

LABOR	
PARTS	
DEDUCTIBLE	
SUBLET	
SHOP SUPPLIES	
HAZARDOUS MATERIALS	
SALES TAX OR TAX I.D.	
SPECIAL ORDER DEPOSIT	
DISCOUNTS	
TOTAL DUE	

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
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R/O Open Date	R/O Number				
4/12/18					
R/O Close Date	Status				
4/24/18	Reprint				
Mileage In	Mileage Out				
37129	37130				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone	
Home Phone	
LONG BEACH, CA	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
<p>RECOMMEND REPAIR PCM CODES FOR REPAIRS AND RESULTS . PERFORM EEC TEST OBTAINED DTCS PCM CODE P0073 PI D MONITOR AAT SENSOR READING AND VOLTAGE OK. FOUND MISSING FRONT BUMPER GRILL AND MISPLACE AAT SENSOR . UNABLE TO DUPLICATE OR VERIFY CUSTOMERS CONCERN . LINE #6 CHECKED NOISE UNDER HOOD. ONLY NOISE HEA INJECTOR PULSE CLICKING NOISE IS NORMAL. NO CONCER N NOISE FOUND. AFTERMARKET AIR CLEANSER SYSTEM STOCK AND EXHAUST SYSTEM</p>	
<p>#6 - FM Customer Reports: GUEST STATES THERE IS A CLICKING NOISE COMING FROM ENGINE AREA Tech: Ivan Bojorquez (127) Sub Total: Labor: .00 Parts: .00 Total: .00 UNABLE TO VERIFY CONCERN</p>	
<p>#7 - FM Customer Reports: PREVIOUSLY REPLACED SUNROOF--HEADL INER NEEDS TO BE CLEANED RO Tech: Ivan Bojorquez (127) Sub Total: Labor: .00 Parts: .00 Total: .00 CLEANED HEADLINER AND ALL INTERIOR</p>	
<p>#8 - FM Customer Reports: PREVIOUSLY REPLACED STEERING WHEEL BOLT AND STEERING WHEEL IS SCRATCHED RO TECH B6M Tech: Luis Rodriguez (B6M) Sub Total: Labor: .00 Parts: .00 Total: .00 INSPECTED STEERING WHEEL AND FOUND STEERING WHEEL PEELING-NOT SCRATCHED FROM PREVIOUS REPAIRS</p>	

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

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Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

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R/O Open Date	R/O Number				
4/12/18					
R/O Close Date	Status				
4/24/18	Reprint				
Mileage In	Mileage Out				
37129	37130				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone	
Home Phone	
LONG BEACH, CA	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
NOT COVERED UNDER WARRANTY	
#9 - FM Customer Reports: GUEST STATES POWER POINT CAP IN REAR SEATING AREA FELL OFF Tech: Luis Rodriguez (B6M) Sub Total Labor: .00 Parts: .00 Total: .00 SEE RO# [REDACTED]	
#10 - FM Customer Reports: GUEST STATES FRONT BUMPER HAS A VERY SMALL CHIP AND ALSO THE FRONT BUMPER DAMAGED Tech: Jesus Obeso (121) BODY SHOP REPAIRED FRONT BUMPER SCRATCHES	



Original Estimate \$	Date	Time	LABOR	.00
			PARTS	.00
Additional Cost \$	Date	Time	DEDUCTIBLE	.00
			SUBLET	.00
Additional Cost \$	Date	Time	SHOP SUPPLIES	.00
			HAZARDOUS MATERIALS	.00
			SALES TAX OR TAX I.D.	.00
TOTAL \$	Date	Time	SPECIAL ORDER DEPOSIT	.00
			DISCOUNTS	.00
			TOTAL DUE	.00

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
 P&A Code: 11846



Caruso

3500 - 3600 Cherry Ave., Long Beach, CA 90807
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R/O Open Date	R/O Number				
6/11/18					
R/O Close Date	Status				
6/15/18	Reprint				
Mileage In	Mileage Out				
40317	40318				
Service Advisor / Tac #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone					
Home Phone					
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Email: [REDACTED] AR#: RM0039694	
#1 - FM BATT: INSPECT BATTERY AND RECORD RESULTS Tech: Jesus Obeso (121) 500	Warranty
#2 - FM BRK: INSPECT BRAKES AND RECORD RESULTS Corrected by GBK: BRAKE PADS/LININGS ARE "OKAY" AT THIS TIME Tech: Jesus Obeso (121) ALL 6MM	Warranty
#3 - FM TIRE: PER CALIFORNIA REGULATIONS WE CHECK TIRE PRESSURE Corrected by GTIRE: GREEN = TIRE TREAD DEPTH IS OKAY AT THIS TIME Tech: Jesus Obeso (121) ALL 6/32NDS	Warranty
#4 - FM 99P: PERFORMED VEHICLE CHECK-UP AND RECORD RESULTS Tech: Jesus Obeso (121)	Warranty
#5 - FM Customer Reports: GUEST STATES THERE IS A TICKING NOISE AT IDLE COMING FROM ENGINE AREA Corrected by 12650D22: (N12) (42 VAPOR MANAGEMENT VALVE / CANISTER PURGE VALVE - Tech: Jesus Obeso (121) Corrected by 1006D: Non Rotational Noise Wireless Electronic Chassis E	Warranty

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____
 Customer acknowledges a receipt of a copy hereof
 Signature X _____ Date _____

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BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
 P&A Code: 11846



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R/O Open Date	R/O Number
6/11/18	
R/O Close Date	Status
6/15/18	Reprint
Mileage In	Mileage Out
40317	40318
Service Advisor / Tag #	
Sheri Atkins/	

Work Phone		Vehicle Identification Number	
LONG BEACH, CA		3FA6POHD6GR	
Home Phone		Delivery Date	In-Service Date
Year	Make	Model	Body
2016	FORD	FUSION SE FWD	4D SED
		Color	License Number
		SILVER	

DESCRIPTION OF SERVICE AND PARTS	Qty:	AMOUNT
Tech: Jesus Obeso (121) Installed GG9Z 9D289 C (FP):TUBE ASY - FUEL VAPOUR VERIFY THE CONCERN. PERFORM NON ROTATIONAL NOISE-WIRELESS-ELECTRONIC CHASSIS EAR DIAGNOSIS FOUND EVAP PURGE VALVE NOISY AT TIMES WHILE PURGING. REMOVED AND REPLACED EVAP PURGE VALVE ASSEMBLY RETEST OK	1	Warranty Warranty

Original Estimate \$	Date	Time	LABOR		.00
Additional Cost \$	Date	Time	PARTS		.00
Additional Cost \$	Date	Time	DEDUCTIBLE		.00
TOTAL \$	Date	Time	SUBLET		.00
			SHOP SUPPLIES		.00
			HAZARDOUS MATERIALS		.00
			SALES TAX OR TAX I.D.		.00
			SPECIAL ORDER DEPOSIT		.00
			DISCOUNTS		.00
			TOTAL DUE		.00

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X	Date	
Customer acknowledges a receipt of a copy hereof		
Signature X	Date	

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
 P&A Code: 11846



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Saturday 7:00 AM - 2:00 PM
Closed Sunday
562-627-5100



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R/O Open Date	R/O Number				
12/05/18					
R/O Close Date	Status				
12/26/18	Reprint				
Mileage In	Mileage Out				
47209	47210				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone					
Home Phone					
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	QTY	AMOUNT
Tech: Ivan Bojorquez (127)		
Installed EG9Z 7902 E :CONVERTER ASY	Qty: 1	Warranty
Installed CV6Z 6375 C (FP): PLYWHEEL ASY	Qty: 1	Warranty
Installed W715618 S437 :NUT	Qty: 4	Warranty
Installed BE8Z 6379 AB :BOLT - HEX.HEAD	Qty: 6	Warranty
Installed W712146 S437 :BOLT	Qty: 1	Warranty
Installed W716200 S437 :STUD	Qty: 1	Warranty
Installed W705606 S440 :NUT	Qty: 2	Warranty
Installed W500545 S439 :BOLT	Qty: 2	Warranty
Installed W520214 S442 :NUT - HEX.	Qty: 2	Warranty
Installed W716457 S439 :BOLT AND WASHER ASY - HEX.	Qty: 2	Warranty
Installed XT 10 QLVC :OIL - AUTOMATIC TRANSMISSION	Qty: 6	Warranty
Installed 4S4Z 3N324 AA :RETAINER - BEARING	Qty: 1	Warranty
Installed W520102 S442 :NUT - LOCKING	Qty: 2	Warranty
Installed W713478 S439 :BOLT	Qty: 2	Warranty
Installed W716457 S439 :BOLT AND WASHER ASY - HEX.	Qty: 2	Warranty
Installed 9L8Z 7A103 H :PUMP ASY - OIL	Qty: 1	Warranty
Installed BE5Z 7A098 E :SCREEN ASY	Qty: 1	Warranty
Installed TA 30 :SEALANT - SILICONE	Qty: 1	Warranty
Installed ZC 30 A :REMOVER - SILICONE	Qty: 1	Warranty
Installed XT 10 QLVC :OIL - AUTOMATIC TRANSMISSION	Qty: 10	Warranty
Installed PM 4 A :BRAKE CLEANER	Qty: 1	Warranty
Installed PM 4 A :BRAKE CLEANER	Qty: 1	Warranty
Installed W520215 S440 :NUT - HEX.	Qty: 2	Warranty
PERFORM ROAD TEST VERIFIED LOUD KNOCKING NOISE		
HOOKED UP WIRED CHASSISEARS TO AID DIAGNOSIS		
PERFORM ROAD TEST AND RAISED VEHICLE AND PINPOINT		
NOISE AT TRANSMISSION BELLHOUSING AREA. RAN OASIS		
FOUND NO TSB OR SSM ASSOCIATED WITH CONCERN. MTIME		

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
EPA #: CAL109269019
P&A Code: 42063
P&A Code: 11846



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R/O Open Date	R/O Number				
12/05/18					
R/O Close Date	Status				
12/26/18	Reprint				
Mileage In	Mileage Out				
47209	47210				
Service Advisor / Tech #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone					
Home Phone					
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
0.3 TO WORK AROUND CUSTOMERS ADDON AFTERMARKET WIRING HARNESS FOR ALARM AND SPECIAL LIGHTING REMOVE TRANSMISSION AND MOUNT ON BENCH FIXTURE AND PERFORM INSPECTION. FOUND FLEXPLATE BROKEN AT HER FAULT FOR KNOCKING NOISE. REMOVE TORQUE CONVETER FOR INSPECTION. FOUND TORQUE CONVERTER HUB DAMAGED AND PUMP BUSHING SCORED. MTIME 0.3 FOR FILLING OUT COST CAP SHEET ONLINE. COST CA P RESULTS REPAIR. DISASSEMBLE TRANSMISSION AND REASSEMBLE TRANSMISSION REPLACING FILTER AND PUMP. REPLACE TORQUE CONVERTER AND FLEXPLATE WITH NEW BOLTS. FLUSH AND BACK FLUSH TRANSMISSION COOLER LINES. REINSTALL TRANSMISSION REPLACING ALL NECESSARY HARDWARE. TOPPED OFF FLUID LEVEL MTIME 0.3 TO CLEAR ANY CODES PERFORM POST ROAD TEST FOR	
#2 - FM ACONTACT: I AGREE TO HAVE THE DEALER CONTACT ME VIA Tech: Ivan Bojorquez (127)	Warranty
#3 - FM BATT: INSPECT BATTERY AND RECORD RESULTS Tech: Ivan Bojorquez (127)	Warranty
#4 - FM BRK: INSPECT BRAKES AND RECORD RESULTS Tech: Ivan Bojorquez (127)	Warranty
#5 - FM TIRE: PER CALIFORNIA REGULATIONS WE CHECK TIRE PRESSURE Tech: Ivan Bojorquez (127) 9/32NDS	Warranty

Original Estimate \$	Date	Time	LABOR		
Additional Cost \$	Date	Time	PARTS		
Additional Cost \$	Date	Time	DEDUCTIBLE		
TOTAL \$	Date	Time	SUBLET		
			SHOP SUPPLIES		
			HAZARDOUS MATERIALS		
			SALES TAX OR TAX I.D.		
			SPECIAL ORDER DEPOSIT		
			DISCOUNTS		
			TOTAL DUE		

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____	Date _____
Customer acknowledges a receipt of a copy hereof	
Signature X _____	Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
 P&A Code: 11846



Caruso

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 Saturday 7:00 AM - 2:00 PM
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R/O Open Date	R/O Number				
12/05/18					
R/O Close Date	Status				
12/26/18	Reprint				
Mileage In	Mileage Out				
47209	47210				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6G					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone: [REDACTED]

Home Phone: [REDACTED]

Address: LONG BEACH, CA [REDACTED]

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#6 - FM WASH: PLEASE WASH VEHICLE Tech: Ivan Bojorquez (127)	Warranty
#7 - FM 99P PERFORMED VEHICLE CHECK-UP AND RECORD RESULTS Tech: Ivan Bojorquez (127) CHECK ENGINE LIGHT IS ON	Warranty
#8 - FM Customer Reports: ALL AMERICAN TOW Tech: Ivan Bojorquez (127)	Warranty
#9 * FM Customer Reports: STORY CONTINUED ADDED OPERATION: State of California Tech: Ivan Bojorquez (127) FOR 5 MILES VERIFIED PROP-ER TRANSMISSION OPERATI NG MTIME 0.2 TO PERFORM FINAL QUICK TEST PASSED. PERFORM AND CORRECT TOE IN ADJUSTMENT MTIME 0.3 TO PERFORM MISFIRE MONITOR NEUTRAL PROFILE CORRECTION PROCEDURE	Warranty
#10 * FM ESPRENTAL: ESP RENTAL ADDED OPERATION 10 DAYS ESP APPROVAL CODE ESPA379966 INSPECTION & REPAIR STATION	

Original Estimate \$	Date	Time	LABOR	.00
			PARTS	.00
Additional Cost \$	Date	Time	DEDUCTIBLE	.00
			SUBLET	.00
Additional Cost \$	Date	Time	SHOP SUPPLIES	.00
			HAZARDOUS MATERIALS	.00
			SALES TAX OR TAX I.D.	.00
TOTAL \$	Date	Time	SPECIAL ORDER DEPOSIT	.00
			DISCOUNTS	.00
			TOTAL DUE	.00

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
EPA #: CAL109269019

P&A Code: 42063
P&A Code: 11848



Caruso

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 Saturday 7:00 AM - 2:00 PM
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R/O Open Date	R/O Number				
1/23/19					
R/O Close Date	Status				
3/08/19	Reprint				
Mileage In	Mileage Out				
50344	50344				
Service Advisor / Tag #					
Sheri Atkins					
Vehicle Identification Number					
3BA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

LONG BEACH, CA [REDACTED]

Work Phone [REDACTED]

Home Phone [REDACTED]

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Email: [REDACTED] AR#: RM0039694	
#1 - FM ACONTACT: I AGREE TO HAVE THE DEALER CONTACT ME VIA Tech: Shop Tech(301) NO WORK DONE - CUSTOMER KEEPS CANCELING APPOINTMENT	Internal
#2 - FM BATT: INSPECT BATTERY AND RECORD RESULTS Tech: Shop Tech(301)	Internal
#3 - FM BRK: INSPECT BRAKES AND RECORD RESULTS Tech: Shop Tech(301)	Internal
#4 - FM TIRE: PER CALIFORNIA REGULATIONS WE CHECK TIRE PRESSURE Tech: Shop Tech(301)	Internal
#5 - FM WASH: PLEASE WASH VEHICLE Tech: Shop Tech(301)	Internal
#6 - FM 99P: PERFORMED VEHICLE CHECK-UP AND RECORD RESULTS Tech: Shop Tech(301)	Internal
#7 - FM Customer Reports: GUEST STATES AN OUTSIDE SHOP TOLD HIM THE BRAKE LINE SNAPPED-ADVISE Caused by TAKING CAR 1-26-18 Tech: Shop Tech(301) GUEST WILL RETURN FOR OTHER CONCERNS AFTER BRAKE LINE IS REPAIRED	Internal

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

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Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
EPA #: CAL109269019

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P&A Code: 11846



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R/O Open Date	R/O Number				
1/23/19					
R/O Close Date	Status				
3/08/19	Reprint				
Mileage In	Mileage Out				
50344	50344				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

LONG BEACH, CA

Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#8 - FM CEL: CUSTOMER STATES CHECK ENGINE LIGHT ON OUTSIDE SHOP INFORMED HIM OF A CLOGGED PCV TUBE Tech: Jesus Obeso (121) Installed DG9Z-14526 P :CIRCUIT BREAKER ASY REPLACED FUSES	RETRIEVE Internal Internal
#9 - FM Customer Reports: GUEST STATES OUTSIDE SHOP TOLD HIM COOLANT LEVEL IS LOW--ADVISE Tech: Shop Tech(301) NO WORK DONE	Internal
#10 - FM Customer Reports: GUEST STATES VEHICLE CLUNKS INTO GEAR FROM PARK TO DRIVE Tech: Shop Tech(301) NO WORK DONE	Internal
#11 * FM Customer Reports: CAR LEFT 1-26-19-RETURNING 3-6-19 ADDED OPERATION Tech: Shop Tech(301) CAR NEVER RETURNED--NO WORK DONE	Internal

Original Estimate \$	Date	Time	LABOR	.00
Additional Cost \$	Date	Time	PARTS	.00
Additional Cost \$	Date	Time	DEDUCTIBLE	.00
TOTAL \$	Date	Time	SUBLET	.00
			SHOP SUPPLIES	.00
			HAZARDOUS MATERIALS	.00
			SALES TAX OR TAX I.D.	.00
			SPECIAL ORDER DEPOSIT	.00
			DISCOUNTS	.00
			TOTAL DUE	.00

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____


Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS


BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
 P&A Code: 11846



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R/O Open Date	R/O Number				
4/30/19					
R/O Close Date	R/O Close				
6/04/19	Reprint				
Mileage In	Mileage Out				
59070	59075				
Service Advisor / Tech #					
Sheri Atkins					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone	Home Phone
LONG BEACH, CA	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Email: [REDACTED] AR#: RM0039694	
#1 - FM Customer Reports: GUEST STATES VEHICLE IS LOSING COOLANT EXCESSIVELY AND WHITE SMOKE COMES OUT OF TAILPIPE	
Corrected by MT6051: (L87) (42)	
Tech: James McCoy (F84)	Warranty
Tech: James McCoy (F84)	Warranty
Corrected by 8005D: Cooling System Pressure Test	
Diagnosis:	
Tech: James McCoy (F84)	Warranty
Corrected by 12650D: EEC System Diagnosis (Quick Test).	
Tech: James McCoy (F84)	Warranty
Corrected by 12650DX1: Extra time to repeat Final Quick Test	
Tech: James McCoy (F84)	Warranty
Corrected by 6007A: Engine Assembly Remove and Install.	
Tech: James McCoy (F84)	Warranty
Corrected by 6007AXQ: Extra Time For A Post-Repair Road Test.	
Tech: James McCoy (F84)	Warranty
Corrected by 6007A34: Service Engine Assembly FR (Ford Remanufactured En	
Tech: James McCoy (F84)	Warranty
Corrected by 6007E: Engine Exchange Diagnosis.	
Tech: James McCoy (F84)	Warranty
Corrected by 6007E1: Inspect and Determine Engine Condition Check.	
Tech: James McCoy (F84)	Warranty

Original Estimate \$	Date	Time	LABOR
			PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
			SUBLET
Additional Cost \$	Date	Time	SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
TOTAL \$	Date	Time	SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
 EPA #: CAL109269019

P&A Code: 42063
 P&A Code: 11846



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R/O Open Date	R/O Number				
4/30/19					
R/O Close Date	Status				
6/04/19	Reprint				
Mileage In	Mileage Out				
59070	59075				
Service Advisor / Tan #					
Sheri Atkins					
Vehicle Identification Number					
3FA6P0HD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone					
Home Phone					
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Work performed by PACRENTAL : 4062 ()	Warranty
Installed DS7Z 6006 E (FP):SERVICE ENGINE ASY Qty: 1	Warranty
Installed DS7Z 9439 A :GASKET - INTAKE MANIFOLD Qty: 1	Warranty
Installed DS7Z 9450 A :GASKET - EXHAUST MANIFOLD Qty: 1	Warranty
Installed W715309 S300 :STUD Qty: 4	Warranty
Installed W716271 S437 :NUT Qty: 4	Warranty
Installed W714789 S300 :RING Qty: 1	Warranty
Installed BM5Z 2A572 A :GASKET - VACUUM PUMP Qty: 1	Warranty
Installed DS7Z 6K775 A :INTERCOOLER Qty: 1	Warranty
Installed DS7Z 9L438 A :GASKET Qty: 1	Warranty
Installed DS7Z 9E936 A :GASKET Qty: 1	Warranty
Installed 6M5Z 6B752 A :GASKET Qty: 1	Warranty
Installed DS7Z 9E583 A :SEAL Qty: 1	Warranty
Installed KS7Z 6C646 A :DUCT - AIR Qty: 1	Warranty
Installed GG9Z 6068 A :HOUSING - TRANSMISSION EXTE Qty: 1	Warranty
Installed VC 3 B :ANTI-FREEZE Qty: 1	Warranty
VERIFIED CONCERN PERFORMED EEC TEST P0300 P0301 P0302 P0316 INSPECTED ENGINE AND COOLANT AND FOUND LOW FILLED COOLANT WITH WATER REMOVED ALL 4 SPARK PLUGS PERFORMED COOLANT SYSTEM PRESSURE TEST AND FOUND COOLANT IN CYLINDER 1 AND 2 RMEOVED THROTTLE BODY AND USED BORESCOPE AND FOUND COOLANT INSIDE INTAKE MANIFOLD OPEDNED HOTLINE CONTACT ID.1166009 93 DISASSEMBLED ENGINE TO DETERMINER ROOT CAUSE. REMOVED CYLINDER HEAD TO CHECK FLATNESS OF CYLINDER HEAD AND ENGINE BLOCK FOUND CYLINDER HEAD WARP AND CYLINDER BLOCK PITTING IN CYLINDER AREA ALSO F OUND COOLANT DYE IN CYLINDER 1 AND 2 PER HOTLINE W AS ADVISED TO REPLACE LONG BLOCK ASSEMBLY FOR REPA	

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____


Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
 EPA #: CAL109269019


P&A Code: 42063
 P&A Code: 11846



Caruso

2600 N. 26th Street, Long Beach, CA 90807

FORD & LINCOLN SERVICE HOURS:
 Mon. - Fri. 7:00 AM - 7:00 PM
 Saturday 7:00 AM - 2:00 PM
 Closed Sunday
 562-627-5100



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R/O Open Date	R/O Number				
4/30/19					
R/O Close Date	Status				
6/04/19	Reprint				
Mileage In	Mileage Out				
59070	59075				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone: [REDACTED]

Home Phone: [REDACTED]

LONG BEACH, CA [REDACTED]

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
IR. REASSEMBLED OLD ENGINE AND REMOVED FROM VEHICLE INSTALLED NEW LONG BLOCK AND COOLER AND TRANSFERRED ALL NECESSARY COMPONENTS REPLACED ALL NECESSARY GASKETS AND SEALS ALSO REPLACED TURBO TUBE DUE TO DAMAGE FROM REMOVING OLD ENGINE. REASSEMBLED FILL AND BLEED COOLANT FILLED ENGINE WITH OIL RECHARGED A/C SYSTEM CLEARED DTCS AND KAM PERFORMED	
#2 - FM CONTACT: I AGREE TO HAVE THE DEALER CONTACT ME VIA Tech: James McCoy (F84)	Warranty
#3 - FM BATT: INSPECT BATTERY AND RECORD RESULTS Tech: James McCoy (F84)	Warranty
#4 - FM BRK: INSPECT BRAKES AND RECORD RESULTS NOT INSPECTED Tech: James McCoy (F84)	Warranty
#5 - FM TIRE: PER CALIFORNIA REGULATIONS WE CHECK TIRE PRESSURE Tech: James McCoy (F84) ALL 10/32NDS 35PSI	Warranty
#6 - FM WASH: PLEASE WASH VEHICLE Tech: James McCoy (F84)	Warranty
#7 - FM 99PX: PERFORMED VISUAL VEHICLE INSPECTION INCLUDING Tech: James McCoy (F84)	Warranty

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
EPA #: CAL109269019

P&A Code: 42053
P&A Code: 11846



Caruso

1601 28th Street, Long Beach, CA 90801

FORD & LINCOLN SERVICE HOURS:
 Mon. - Fri. 7:00 AM - 7:00 PM
 Saturday 7:00 AM - 2:00 PM
 Closed Sunday
 562-627-5100



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R/O Open Date	R/O Number				
4/30/19					
R/O Close Date	Distance				
6/04/19	Reprint				
Mileage In	Mileage Out				
59070	59075				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6POHD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone					
Home Phone					
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#8 - FM Customer Reports: GUEST STATES THERE IS AN OIL LEAK-ADVISE Tech: James McCoy (F84) SEE LINE 1	Warranty
#9 - FM Customer Reports: GUEST STATES PCV PIPED IS CLOGGED-ADVISE Tech: James McCoy (F84) SEE LINE 1	Warranty
#10 - FM Customer Reports: GUEST STATES LANE-ASSIST IS NOT WORKING Tech: James McCoy (F84)	Warranty
#11 - FM CEL: CUSTOMER STATES CHECK ENGINE LIGHT ON Tech: James McCoy (F84) SEE LINE 1	Warranty
#12 - FM Customer Reports: GUEST STATES VEHICLE MISFIRES Tech: James McCoy (F84) SEE LINE 1	Warranty
#13 * FM RENTAL: RENTAL CAR ADDED OPERATION VIN#3FA6POHD6KR [REDACTED] CONTRACT 4062 ESP RENTAL 10 DAYS ESPA927347 SUBMIT FOR 4 DAYS FLP 23 DAY RENTAL Tech: Shop Tech(301)	Warranty

Original Estimate \$	Date	Time	LABOR
Additional Cost \$	Date	Time	PARTS
Additional Cost \$	Date	Time	DEDUCTIBLE
TOTAL \$	Date	Time	SUBLET
			SHOP SUPPLIES
			HAZARDOUS MATERIALS
			SALES TAX OR TAX I.D.
			SPECIAL ORDER DEPOSIT
			DISCOUNTS
			TOTAL DUE

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
EPA #: CAL109269019

P&A Code: 42063
P&A Code: 11846



Caruso

9500 - 9800 Cherry Ave., Long Beach, CA 90807

FORD & LINCOLN SERVICE HOURS:
 Mon. - Fri. 7:00 AM - 7:00 PM
 Saturday 7:00 AM - 2:00 PM
 Closed Sunday
 562-627-5100





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R/O Open Date	R/O Number				
4/30/19					
R/O Close Date	Status				
6/04/19	Reprint				
Mileage In	Mileage Out				
59070	59075				
Service Advisor / Tag #					
Sheri Atkins/					
Vehicle Identification Number					
3FA6P0HD6GR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

LONG BEACH, CA

Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

Work Phone	Vehicle Identification Number				
	3FA6P0HD6GR				
Home Phone	Delivery Date				
	In-Service Date				
Year	Make	Model	Body	Color	License Number
2016	FORD	FUSION SE FWD	4D SED	SILVER	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
PLEASE SUBMIT FOR 10 DAYS ESP---4 DAYS FLP	
#14 * FM Customer Reports: LINE 1 STORY CONTINUED ADDED OPERATION Tech: James McCoy (F84) MISFIRE PROFILE TEST DROVE AFTER REPAIR OK. MTIME 6.3 HR TO TEAR DOWN AND REASSEMBLED OLD ENGINE ALSO REPLACED UPPER TRANSMISSION MOUNT DUE TO BROKEN	Warranty
	
	

Original Estimate \$	Date	Time	LABOR	.00
Additional Cost \$	Date	Time	PARTS	.00
Additional Cost \$	Date	Time	DEDUCTIBLE	.00
TOTAL \$	Date	Time	SUBLET	.00
			SHOP SUPPLIES	.00
			HAZARDOUS MATERIALS	.00
			SALES TAX OR TAX I.D.	.00
			SPECIAL ORDER DEPOSIT	.00
			DISCOUNTS	.00
			TOTAL DUE	.00

I acknowledge notice and oral approval of an increase in the original estimated price.

Signature X _____ Date _____

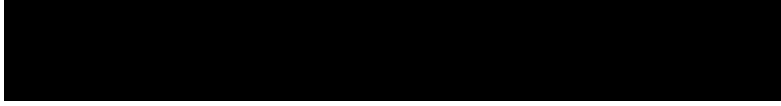
Customer acknowledges a receipt of a copy hereof

Signature X _____ Date _____

THANK YOU FOR YOUR BUSINESS

BAR #: ARD167486
EPA #: CAL109289019

P&A Code: 42063
P&A Code: 11846





LEMON LAW EXPERTS

September 30, 2020

**** PLEASE RESPOND VIA EMAIL TO CONTACT@NOLEMON.COM ****

SENT VIA U.S. MAIL ONLY

FMC Consumer Claims
Ford Motor Company
One American Road, Suite 400
Dearborn, MI 48126

OGC Lit
Product Claims

OCT 8 2020

Re: [REDACTED] **v. Ford Motor Company**

Vehicle: 2017 Ford Fusion

VIN No.: 3FA6P0HD1HR [REDACTED]

Notice of Representation by Counsel

Dear Sir or Madam:

Please be advised that our office has been retained to represent [REDACTED] with regard to claims against Ford Motor Company pursuant to the Song-Beverly Consumer Warranty Act, California *Civil Code* § 1790, *et. seq.*, ("California Lemon Law") and/or the Federal Magnuson-Moss Warranty Act, 15 U.S.C. 2310, with regard to the above-referenced vehicle.

Having now been advised as to our representation, KINDLY CEASE AND DESIST FROM ANY FURTHER CONTACT OR COMMUNICATIONS, WRITTEN, VERBAL, OR OTHERWISE WITH OUR CLIENT, thereby directing all future correspondence and communications regarding this matter to our office, exclusively. If you fail to act in conformity with this directive, injunctive relief will be sought against you.

You are hereby notified that pursuant to California *Civil Code* § 1794(d) and/or 15 U.S.C. 2310(d), that any settlement made with our client requires the payment of our attorney's fees and costs. If a settlement is reached between you and our client that does not make arrangements for the payment of our attorney's fees and costs, we will be forced to file suit against you. In addition, through this correspondence, you are hereby notified of our attorney's lien.

Our client hereby requests that you comply with California *Civil Code* § 1793.2(d)(2) and seeks relief for numerous defects, non-conformities, and unsuccessful repair attempts with regard to the subject vehicle. These defects and non-conformities include, but are not limited to the following:

1. Defective body system;
2. Defective engine;
3. Defective braking system;

5757 WEST CENTURY BOULEVARD, SUITE 500, LOS ANGELES, CALIFORNIA 90045
TELEPHONE (310) 442-1410 • FACSIMILE (877) 566-8828
EMAIL: CONTACT@NOLEMON.COM • WWW.NOLEMON.COM

RQ22-004 000073 LC

CONSUMER LAW EXPERTS, PC

Ford Motor Company

Re: [REDACTED] v. Ford Motor Company

September 30, 2020

Page 2

4. Defective air conditioning system;
5. Defective exhaust system; and
6. Any additional complaints made by our client, whether or not they are contained in your company's records or on any repair orders.

The defects and non-conformities listed hereinabove constitute a substantial impairment of the use, value and/or safety of the vehicle. As a result of these defects and non-conformities, my client has justifiably lost confidence in the vehicle. Accordingly, you are hereby notified that my client is revoking acceptance of this vehicle and my client has directed me to demand the cancellation of the contracts and the return of all funds paid towards this vehicle, including all finance charges, all collateral charges, any trade-in value given, and incidental and consequential damages.

To avoid the unnecessary time and expense of litigation, my client merely requests a refund for the defective vehicle, plus payment of our attorneys' fees and costs. Please keep in mind that at this stage, our attorneys' fees and costs are minimal. It is our desire to resolve this matter as amicably and expeditiously as possible without the need for causing either party to incur any unnecessary expenses.

Accordingly, if you wish to proceed with a quick resolution of this matter, please feel free to contact my office. Please be advised that if the matter has not been resolved within fourteen (14) days from the date of this correspondence, we will have no choice but to file suit. To streamline the process, you may contact me via email at contact@nolemon.com.

Very truly yours,

[REDACTED]

JESSICA ANVAR

**** PLEASE RESPOND VIA EMAIL TO CONTACT@NOLEMON.COM ****

CONSUMER LAW EXPERTS, PC

Ford Motor Company

Re: [REDACTED] v. Ford Motor Company

September 30, 2020

Page 3

NOTICE OF LIEN

Re: [REDACTED] v. Ford Motor Company

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Consumer Law Experts, PC gives notice of a contractual lien for attorney's fees against ANY recovery in the above-referenced matter by Plaintiff, [REDACTED]. Pursuant to California law, this lien is a priority lien.

This Notice of Lien is filed pursuant to [REDACTED] (1986) 186 Cal. App. Ed. [REDACTED] which provides that filing a Notice of Lien in a pending action is a proper method to give notice of the lien to all parties and their attorneys.

Any party or attorney for that party who, without knowledge of the lien, whether filed or not, distributes any funds to Plaintiff without first satisfying this lien may be held personally liable under theories including common counts, conversion, breach of fiduciary duty, etc. for the amount due under the lien pursuant to [REDACTED] v. *Fireman's Fund Insurance Co.* (1976) 62 Cal. App. 3d 745, 750-751, *Kaiser Foundation Health Plan, Inc. V. Aguiluz* (1996) 47 Cal. App. 4th 302; and [REDACTED] v. *Rau* (1963) 216 Cal. App. 2d 68.

Very truly yours,

[REDACTED]

JESSICA ANVAR

9/22/2020

ATENCIÓN:

LIC - BIANCA CONTRERAS

DE PARTE: LIC. [REDACTED]

Ford. Fusion. 2017.

LIC [REDACTED]

OASIS RESULTS: 3FA6P0HD1HR [REDACTED]	USA - EN	17-SEPTEMBER-2020 / 16:32:08 EST LOCAL TIME: 17-SEPTEMBER-2020 / 1:32:04 PM
--	-----------------	--

Connected Vehicle Data ⓘ

Data not available for this vehicle.

Vehicle Health Alerts (VHA) ↻

No Active Vehicle Health Alerts

VEHICLE INFORMATION

VEHICLE DESCRIPTION:
2017 Fusion
BODY STYLE: 4 Door Sedan
ENGINE: 1.5L GTDI I4
ENGINE CALIBRATION: HC71C10A
TRANSMISSION:
6 Speed Auto Trans 6F35
FUEL TYPE: Gasoline
Sold to Fleet: NO

VERSION/SERIES: SERIES 10
DRIVE TYPE:
2 WHL L/H FRONT DRIVE
AXLE RATIO: 3.07 Ratio
AXLE CODE: 30
WHEEL SIZE:
Style 1 Alloy 18" Wheel
TIRE: P235/45 R18
Retail sales type: R

ADDITIONAL INFORMATION

PAINT COLOR: Ruby Red TC
PAINT CODE: RR
GROSS VEHICLE WEIGHT:
4500 LB. GVW
RADIO:
SYNC VERSION: V4 Gen3
VHR ACTIVATED: N
MODEM:

OUTSTANDING FIELD SERVICE ACTIONS

- **18L02 CALIFORNIA EMISSION WARRANTY PARTS COVERAGE**

NO WARNING MESSAGES FOUND FOR THIS VIN

ACCURATE REPAIR NOTIFICATIONS

NO ARN MESSAGES FOUND

GENERAL WARRANTY INFORMATION

WARRANTY START DATE:
29-May-2017
SALE MILEAGE:

BUILD DATE: 09-February-2017

RELEASE DATE:
09-February-2017

WARRANTY COVERAGE

New Vehicle Base Warranty

COVERAGE TYPE:
Bumper-to-Bumper
ADDITIONAL INFO:

COVERAGE DESCRIPTION:
3 years / 36,000 Miles (whichever occurs first)

Some B-to-B parts have limited coverage available:

- Brake pads/linings are limited to 12 months / 18,000 mile coverage**
- Wheel alignment and wheel balance are limited to 12 months / 12,000 mile coverage**
- Windshields replaced for stress cracks are limited to 12 months / 12,000 mile coverage**
- Windshield Wiper blades are limited to 6 months coverage**
- Tires are prorated after 12,000 miles driven**

COVERAGE TYPE:
Corrosion Perforation
ADDITIONAL INFO:

COVERAGE DESCRIPTION: 5 years/ Unlimited miles

No perforation req.on Aluminum Panels

COVERAGE TYPE:
Safety Restraint

COVERAGE DESCRIPTION:
5 years / 60,000 Miles (whichever occurs first)

ADDITIONAL INFO: *

COVERAGE TYPE: **Powertrain**

COVERAGE DESCRIPTION:

5 years / 60,000 Miles (whichever occurs first)

ADDITIONAL INFO: *

MARKETING MESSAGES

REWARDS PROGRAM: UNAVAILABLE
[Click to Enroll or Add VIN to Member's Account](#)
[Click to Search for Member and Redeem Points](#)

EXTENDED COVERAGES

[Competitive make ESP part verification](#)

0968 - USA 2020 NEW 72/75,000 PREMIUMCARE W/ROADSIDE

STANDARD DEDUCTIBLE:

OWNER NAME:

OPTIONS: **1STDAYRENT**

100 USD

EXPIRATION DATE: **29-May-2023**

DISTANCE: **75000**

RENTAL: **30 UP TO 10 DAYS**

TOWING: **0 USD**

CONTRACT SOLD BY: **USA 05406**

ESP CONTRACT START DATE:

29-May-2017

ESP CONTRACT START DATE: 05/29/2017 CONTRACT SIGNATURE DATE: 03/17/2020. CONTRACT START DISTANCE: 35512. OWNER OF VEHICLE MUST MATCH OWNER NAME ON OASIS FOR COVERAGE TO APPLY.

WARRANTY REPAIR HISTORY

[Click Here for Full Warranty History](#)

10-AUGUST-2020

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER:

ODOMETER: **036254M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
6051	GASKET CYL HEAD	000	6007A	D8	FAILED GASKET/SEAL
DS7Z 6006Q	ENG ASY LES ACC	001	6007A34		
XO 5W20Q1SP	ENGINE OIL SAE10W40	005	6007E		
DS7Z 9439A	GASKET-INTAKE MANIFO	001	6007E1		
DS7Z 9L438A	INTERCOOLER TO MNFLD	001	6020AXQ		
BM5Z 2A572A	GASKET - VACUUM PUMP	001			
AM5Z 9450A	GSKT-EXH MANIF/MFLR	001			
CV6Z 9450D	GSKT-EXH MANIF/MFLR	001			
4R8Z 6N652A	GASKET TURBO OIL TUB	001			
DS7Z 8527A	O-RING WATER PUMP	001			
VC 13G		001			

VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND EXCESSIVE WHITE SMOKE COMING FRO M TAIL PIPES PER TSB 20-2100 REMOVED ENGINE FROM VEHICLE AND TORN DOWN TO SH ORT BLOCK FOUND CYLINDER HEAD WARPED OUT OF LIMITS 0.004 MM OVER 20 X 20 INC HES AREA REPLACED THE LONG BLOCK AND ROAD TEST AFTER REPAIR CHECK OK

10-AUGUST-2020

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER:

ODOMETER: **036254M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
DS7Z 19703G	COMPR & CL ASY-A/C	001	19700A	42	DOES NOT OPERATE PROPERLY
YN 33A	BATTERY ASSY	022	19700A4		

VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND AC COMPRESSOR LEAKING FROM FRONT SEAL EVACUATE SYSTEM AND REPLACED THE AC COMPRESSOR RECHARGE TO SPECS RE TEST CHECK OK

19-MARCH-2020

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER:

ODOMETER: **035214M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
DS7Z54519A70EBA	PANEL ROOF CONSOLE	001	51958A	42	DOES NOT OPERATE PROPERLY

VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND OVERHEAD CONSOLE LID UNABLE TO C LOSE REPLACED OVERHEAD CONSOLE OK

19-MARCH-2020

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER:

ODOMETER: **035214M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
HG9Z 18124A	ABSORBER KIT-FRT SHO	001	18124AT	42	DOES NOT OPERATE PROPERLY
HG9Z 18124F	ABSORBER KIT-FRT SHO	001			

VERIFIED CUSTOMER CONCERN VISUAL FOUND BOTH FRONT STRUTS LEAKING REPLACED BOTH FRONT STRUTS AND RE TEST CHECK OK

07-FEBRUARY-2020

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER:

ODOMETER: **027643M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
HYFS 094YEC	SP/PLG ASY	001	12405A	42	DOES NOT OPERATE PROPERLY
12405	SPARK PLUGS	000	12650D		
		000	12650D45		

VERIFIED THE CUSTOMERS CONCERN VISUAL OK RETRIEVED CODE P0302 PERFORMED PIN POINT TEST HD TO HD8 REPLACED FAULTY SPARK PLUG # 2 CLEAR CODES ROAD TEST CHECK OK

07-FEBRUARY-2020

DEALER: **Robinson Ford Sales, Inc.**

ODOMETER: **027643M**

WARRANTY CLAIM NUMBER:
[REDACTED]

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
DG9Z 2078D	HOSE ASY-BRAKE	001	2000A	42	DOES NOT OPERATE PROPERLY
PM 20		001	2000AXQ		
PM 4A	BATTERY	001	MTIME		

VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND RIGHT BRAKE CALIPER HOSE LEAKING REPLACED THE HOSE BLEED BRAKE SYSTEM RE TEST CHECK OK ROAD TEST CHECK OK

02-JANUARY-2020

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER: [REDACTED] ODOMETER: **022541M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
DS7Z 7823394B	DRIVE ASY-PWR LIFT W	001	23943A11T	42	DOES NOT OPERATE PROPERLY
DS7Z 7823395B	DRIVE ASY-PWR LIFT W	001	23943AT		

VERIFIED THE CUSTOMERS CONCERN VISUAL OK FOUND BOTH FRONT WINDOW MOTORS INOP REPLACED BOTH WINDOW MOTORS AND RE TEST THE VEHICLE CHECK OK

02-JANUARY-2020

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER: [REDACTED] ODOMETER: **022541M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
			19B37B		

PER CUSTOMER SATISFACTION PROGRAM 19B37 REPROGRAMMED THE PCM

07-AUGUST-2019

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER: [REDACTED] ODOMETER: **019395M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
BG9Z 6038A	INSULATOR-ENG FRONT	001	6038A	42	DOES NOT OPERATE PROPERLY
GG9Z 6068B	INS ASY ENG RR SUPT	001	6038B		
DS7Z 6068A	INS ASY ENG RR SUPT	001	6068A		

VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND ALL EN GINE INSULATORS TORN REPL ACED ALL 3 INSULATORS RE TEST CHECK OK NOTE: REVIEWED ALL MOUNTS TORN WITH EXCESSIVE WEAR

07-AUGUST-2019

DEALER: **Robinson Ford Sales, Inc.**

ODOMETER: **019395M**

WARRANTY CLAIM NUMBER:
[REDACTED]

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
TWC01	TIRE DEFECT WARRANTY	000		1007AD 42	DOES NOT OPERATE PROPERLY
9001 706038163		003			

VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND ALL 4 TIRES WITH A CHUNKING COND ITION REPLACED ALL 4 TIR
ES RE TEST CHECK OK

07-AUGUST-2019

DEALER: **Robinson Ford Sales, Inc.**

WARRANTY CLAIM NUMBER:
[REDACTED]

ODOMETER: **019395M**

PART NUMBER	PART DESCRIPTION	QUANTITY	LABOR OP	CONDITION CODE	CONDITION DESC
BAGM 48H6760	BAT ASY	001	10654C	42	DOES NOT OPERATE PROPERLY
		000	10654C1		

VERIFIED THE CUSTOMERS CONCERN PERFORMED CHARGING SYSTEM TEST THE BATTERY FA ILED THE LOAD TEST

SYMPTOM CODE INFORMATION

GENERAL INFORMATION (***)**

THERE ARE NO SSMS FOR SYMPTOM ENTERED



1777 North Imperial Ave
 Calexico, CA 92231
 (760) 357-3141
 Fax (760) 357-1075
 www.robinsonford.net

SERVICE DEPARTMENT HOURS
 8:00 a.m. to 5:00 p.m.
 Monday - Friday

R/O Open Date	R/O Number
8/10/20	
R/O Close Date	Status
9/10/20	Reprint
Mileage In	Mileage Out
36254	36261
Service Advisor / Tag #	
Ramon Baltazar	

Work Phone			Vehicle Identification Number		
Home Phone			3FA6P0HD1HR		
Delivery Date			In-Service Date		
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#1 - MR ENGIN: ENGINE MINOR CUSTOMER STATES THERE IS EXCESSIVE WHITE SMOKE COMING OUT OF TAILPIPE WHEN START AT COLD. ADVISE Caused by CP:6051 Corrected by 6007E: (E44) (D8) ENGINE EXCHANGE DIAGNOSIS (6009/6006/6007/6012) - Tech: JAVIER SOLTERO(149) Warranty	
Corrected by 6007A: ENGINE ASSEMBLY - REMOVE AND INSTALL (6007) - L Tech: JAVIER SOLTERO(149) Warranty	
Corrected by 6007A34: SERVICE ENGINE ASSEMBLY - FR (FORD REMANUFACTURED Tech: JAVIER SOLTERO(149) Warranty	
Corrected by 6007E1: INSPECT AND DETERMINE ENGINE CONDITION - CHECK (60 Tech: JAVIER SOLTERO(149) Warranty	
Corrected by 6020AXQ: EXTRA TIME TO POST ROAD TEST Tech: JAVIER SOLTERO(149) Warranty	
Installed DS7Z 6006 Q :SERVICE ENGINE ASY Qty: 1 Warranty	
RI: Installed HANDLING :HANDL ALLOW Qty: 1 Warranty	
Installed XO 5W20 Q1SP :MOTORCRAFT SAE 5W-20 SN SN Qty: 5 Warranty	
RI: Installed DS7Z 9439 A :GASKET - INTAKE MANIFOLD Qty: 1 Warranty	
RI: Installed DS7Z 9L438 A :GASKET Qty: 1 Warranty	
RI: Installed BM5Z 2A572 A :GASKET - VACUUM PUMP Qty: 1 Warranty	

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 thereon."

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	
PARTS	
DEDUCTIBLE	
SUBLET	
SHOP SUPPLIES	
HAZARDOUS MATERIALS	
SALES TAX OR TAX I.D.	
SPECIAL ORDER DEPOSIT	
DISCOUNTS	
TOTAL DUE	

NO RETURN ON ELECTRICAL OR SAFETY ITEMS OR SPECIAL ORDERS.

X

RQ22-004 000083 LC



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 (760) 357-3141
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SERVICE DEPARTMENT HOURS
 8:00 a.m. to 5:00 p.m.
 Monday - Friday

R/O Open Date	R/O Number
8/10/20	
R/O Close Date	Status
9/10/20	Reprint
Mileage In	Mileage Out
36254	36261
Service Advisor / Tag #	
Ramon Baltazar	

CALEXICO, CA			Work Phone	Vehicle Identification Number	
			Home Phone	3FA6P0HD1HR	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		
			Delivery Date	In-Service Date	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
RI: Installed AM5Z 9450 A :GASKET	Qty: 1 Warranty
RI: Installed CV6Z 9450 D :GASKET	Qty: 1 Warranty
RI: Installed 4R8Z 6N652 A :GASKET	Qty: 1 Warranty
RI: Installed DS7Z 8527 A :RING	Qty: 1 Warranty
RI: Installed VC 13 G :ANTI-FREEZE	Qty: 1 Warranty
RI: VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND EXCESSIVE WHITE SMOKE COMING FROM TAIL PIPES PER TSB 20-2100 REMOVED ENGINE FROM VEHICLE AND TORN DOWN TO SHORT BLOCK FOUND CYLINDER HEAD WARPED OUT OF LIMITS 0.004 MM OVER 20 X 20 INCHES AREA REPLACED THE LONG BLOCK AND ROAD TEST AFTER REPAIR CHECK OK	

#2 - MR AC: AC AND HEATING SYSTEM CUSTOMER STATES A/C IS INOP AT TIMES. ADVISE Corrected by 19700A: (C05-ESP) (42) PRESSURIZE, LEAK TEST, DISCHARGE, EVACUATE AND CHA Tech: JAVIER SOLTERO(149)	Warranty
Corrected by 19700A4: COMPRESSOR ASSEMBLY-AIR CONDITIONER - REPLACE (197 Tech: JAVIER SOLTERO(149)	Warranty
Installed DS7Z 19703 G (FP):COMPRESSOR ASY	Qty: 1 Warranty
RI:	

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LABOR
PARTS
DEDUCTIBLE
SUBLET
SHOP SUPPLIES
HAZARDOUS MATERIALS
SALES TAX OR TAX I.D.
SPECIAL ORDER DEPOSIT
DISCOUNTS
TOTAL DUE

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R/O Open Date	R/O Number
8/10/20	
R/O Close Date	Status
9/10/20	Reprint
Mileage In	Mileage Out
36254	36261
Service Advisor / Tag #	
Ramon Baltazar	

[REDACTED]			Work Phone	Vehicle Identification Number	
CALEXICO, CA [REDACTED]			Home Phone	3FA6P0HD1HR [REDACTED]	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Installed YN 33 A :REFRIGERANT - R1234YF Qty: 22 RI: VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND AC COMPRESSOR LEAKING FROM FRONT SEAL EVACUATE SYSTEM AND REPLACED THE AC COMPRESSOR RECHARGE TO SPECS RE TEST CHECK OK	Warranty



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LABOR	.00
PARTS	.00
DEDUCTIBLE	.00
SUBLET	.00
SHOP SUPPLIES	.00
HAZARDOUS MATERIALS	.00
SALES TAX OR TAX I.D.	.00
SPECIAL ORDER DEPOSIT	.00
DISCOUNTS	.00
TOTAL DUE	.00

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R/O Open Date	R/O Number
3/19/20	
R/O Close Date	Status
3/31/20	Reprint
Mileage In	Mileage Out
35214	35217
Service Advisor / Tag #	
JAVIER SOLTERO	

Work Phone		Vehicle Identification Number			
Home Phone		3FA6P0HD1HR			
Delivery Date		In-Service Date			
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
	

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LABOR	.00
PARTS	.00
DEDUCTIBLE	.00
SUBLET	.00
SHOP SUPPLIES	.00
HAZARDOUS MATERIALS	.00
SALES TAX OR TAX I.D.	.00
SPECIAL ORDER DEPOSIT	.00
DISCOUNTS	.00
TOTAL DUE	.00

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R/O Open Date	R/O Number
3/19/20	
R/O Close Date	Status
3/31/20	Reprint
Mileage In	Mileage Out
35214	35217
Service Advisor / Tag #	
JAVIER SOLTERO	

CALEXICO, CA			Work Phone	Vehicle Identification Number	
			Home Phone	3FA6P0HD1HR	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		
				Delivery Date	In-Service Date

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
<p>#1 - MR BODY: EXTERIOR TRIM/BODY ELECTRICAL CUSTOMER STATES OVERHEAD CONSOLE LID IS INOP. CHECK AND ADVISE Corrected by 51958A: CONSOLE ASSEMBLY - ROOF - REPLACE (519A58/519A70) Tech: JAVIER SOLTERO(149) Installed DS7Z 54519A70 EBA (FP):CONSOLE ASY - OVE Qty: 1 RI: VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND OVERHEAD CONSOLE LID UNABLE TO CLOSE REPLACED OVERHEAD CONSOLE OK</p>	Warranty Warranty
<p>#2 - MR SUSP: STEERING / SUSPENSION CUSTOMER STATES FRON STRUTS ARE LEAKING. CHECK AND ADVISE. Corrected by 18124AT: SHOCK ABSORBER-FRONT - REMOVE AND INSTALL OR REPLA Tech: JAVIER SOLTERO(149) Installed HG9Z 18124 A (FP):SHOCK ABSORBER ASY Qty: 1 RI: Installed HG9Z 18124 F :SHOCK ABSORBER ASY - FRONT Qty: 1 RI: VERIFIED CUSTOMER CONCERN VISUAL FOUND BOTH FRONT STRUTS LEAKING REPLACED BOTH FRONT STRUTS AND RE TEST CHECK OK</p>	Warranty Warranty Warranty

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PARTS
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SUBLET
SHOP SUPPLIES
HAZARDOUS MATERIALS
SALES TAX OR TAX I.D.
SPECIAL ORDER DEPOSIT
DISCOUNTS
TOTAL DUE

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R/O Open Date	R/O Number
2/07/20	
R/O Close Date	Status
2/20/20	Reprint
Mileage In	Mileage Out
27643	27649
Service Advisor / Tag #	
JORGE RODRIGUEZ	

CALEXICO, CA			Work Phone	Vehicle Identification Number	
			Home Phone	3FA6P0HD1HR	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Installed DG9Z 2078 D (FP):HOSE ASY - BRAKE RI:	Qty: 1 Warranty
Installed PM 20 :FLUID - BRAKE RI:	Qty: 1 Warranty
Installed PM 4 A :BRAKE CLEANER RI:	Qty: 1 Warranty
VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND RIGHT BRAKE CALIPER HOSE LEAKING REPLACED THE HOSE BLEED BRAKE SYSTEM RE TEST CHECK OK ROAD TEST CHECK OK	



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LABOR	.00
PARTS	.00
DEDUCTIBLE	.00
SUBLET	.00
SHOP SUPPLIES	.00
HAZARDOUS MATERIALS	.00
SALES TAX OR TAX I.D.	.00
SPECIAL ORDER DEPOSIT	.00
DISCOUNTS	.00
TOTAL DUE	.00

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R/O Open Date	R/O Number
2/07/20	
R/O Close Date	Status
2/20/20	Reprint
Mileage In	Mileage Out
27643	27649
Service Advisor / Tag #	
JORGE RODRIGUEZ	

CALEXICO, CA			Work Phone	Vehicle Identification Number	
			Home Phone	3FA6P0HD1HR	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#1 - MR ENGIN: ENGINE MINOR CUSTOMER STATES A CHECK ENGINE LIGHT IS ON CHECK AND ADVISE Corrected by 12650D: (E29) (42) EEC SYSTEM DIAGNOSIS - (QUICK TEST) - L Tech: JAVIER SOLTERO (149) Corrected by 12650D45: EEC SYSTEM - DIAGNOSTIC PIN POINT TEST - L Tech: JAVIER SOLTERO (149) Corrected by 12405A: SPARK PLUGS - REPLACE (12405) - L Tech: JAVIER SOLTERO (149) Installed SP 539 (FP): SPARK PLUG Qty: 1 RI: VERIFIED THE CUSTOMERS CONCERN VISUAL OK RETRIEVED CODE P0302 PERFORMED PIN POINT TEST HD TO HD8 REPLACED FAULTY SPARK PLUG # 2 CLEAR CODES ROAD TEST CHECK OK	Warranty Warranty Warranty Warranty
#2 - MR BRAKE: BRAKE CUSTOMER STATES THERE IS A BRAKE FLUID LEAKING FRONT THE FRONT RIGHT TIRE CHECK AND ADVISE Corrected by 2000A: (L63) (42) BRAKE SYSTEM - BLEED (BRAKE) - L Tech: JAVIER SOLTERO (149) Corrected by 2000AXQ: EXTRA TIME FOR POST ROAD TEST Tech: JAVIER SOLTERO (149) Corrected by MTIME: M TIME Tech: JAVIER SOLTERO (149)	Warranty Warranty Warranty

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SHOP SUPPLIES	
HAZARDOUS MATERIALS	
SALES TAX OR TAX I.D.	
SPECIAL ORDER DEPOSIT	
DISCOUNTS	
TOTAL DUE	

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R/O Open Date	R/O Number
1/02/20	
R/O Close Date	Status
1/21/20	Reprint
Mileage In	Mileage Out
22541	22542
Service Advisor / Tag #	
JAVIER SOLTERO	

CALEXICO, CA			Work Phone	Vehicle Identification Number	
			Home Phone	3FA6POHD1HR	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		
			Delivery Date	In-Service Date	

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#1 - MR BODY: EXTERIOR TRIM/BODY ELECTRICAL CUSTOMER STATES BOTH FRONT WINDOWS ARE INOP. ARE TIMES. ADVISE Corrected by 23943A11T: (G07) (42) MOTOR ASSEMBLY - FRONT DOOR ELECTRIC WINDOW - REPL Tech: JAVIER SOLTERO(149) Corrected by 23943AT: TRIM PANEL - FRONT DOOR - REMOVE AND INSTALL (2394 Tech: JAVIER SOLTERO(149) Installed DS7Z 7823394 B (FP):MOTOR ASY - WINDOW O Qty: 1 RI: Installed DS7Z 7823395 B :MOTOR ASY - WINDOW OPERA Qty: 1 RI: Installed DS7Z 7823395 B-C :DS7Z 7823395 B - Core Qty: 1 VERIFIED THE CUSTOMERS CONCERN VISUAL OK FOUND BOTH FRONT WINDOW MOTORS INOP REPLACED BOTH WINDOW MOTORS AND RE TEST THE VEHICLE CHECK OK	Warranty Warranty Warranty Warranty
#2 * MR RECALL: PERFORM MANUFACTURER RECALL OR PROGRAM ADDED OPERATION PERFORM CUSTOMER SATISFACTION PROGRAM 19B37 Corrected by 19B37B: REPROGRAM THE PCM ADDED OPERATION Tech: JAVIER SOLTERO(149) PER CUSTOMER SATISFACTION PROGRAM 19B37 REPROGRAMMED THE PCM	Warranty

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SUBLET
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HAZARDOUS MATERIALS
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1/02/20	
R/O Close Date	Status
1/21/20	Reprint
Mileage In	Mileage Out
22541	22542
Service Advisor / Tag #	
JAVIER SOLTERO	

[REDACTED]		Work Phone		Vehicle Identification Number	
CALEXICO, CA		Home Phone		3FA6P0HD1HR	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
	

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LABOR	.00
PARTS	.00
DEDUCTIBLE	.00
SUBLET	.00
SHOP SUPPLIES	.00
HAZARDOUS MATERIALS	.00
SALES TAX OR TAX I.D.	.00
SPECIAL ORDER DEPOSIT	.00
DISCOUNTS	.00
TOTAL DUE	.00

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R/O Open Date	R/O Number				
8/07/19					
R/O Close Date	Status				
8/23/19	Reprint				
Mileage In	Mileage Out				
19395	19398				
Service Advisor / Tag #					
JAVIER SOLTERO					
Vehicle Identification Number					
3FA6P0HD1HR					
Delivery Date	In-Service Date				
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

Work Phone					
Home Phone					
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
#1 - MR ENGIN: ENGINE MINOR CUSTOMER STATES VEHICLE VIBRATES. CHECK AND ADVISE Corrected by 6038A: (N50) (42) INSULATOR AND/OR SUPPORT - POWERTRAIN FRONT - REPL Tech: JAVIER SOLTERO (149) Corrected by 6038B: INSULATOR - ENGINE UPPER SUPPORT - REPLACE (6038/6 Tech: JAVIER SOLTERO (149) Corrected by 6068A: INSULATOR - POWERTRAIN REAR SUPPORT - REPLACE (603 Tech: ENRIQUE AGUERO (377) Installed BG9Z 6038 A (FP):BRACKET - ENGINE FRONT Qty: 1 RI: Warrantly Installed GG9Z 6068 B :HOUSING - TRANSMISSION EXTE Qty: 1 RI: Warrantly Installed DS7Z 6068 A :HOUSING Qty: 1 RI: Warrantly VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND ALL EN GINE INSULATORS TORN REPLACED ALL 3 INSULATORS RE TEST CHECK OK	
#2 - MR TIRE: WHEEL / TIRES CUSTOMER STATES TIRES ARE COMING APART. CHECK AND ADVISE Caused by CP:TWC01 Corrected by 1007AD: TIRE(S), WHEEL(S), AND/OR VALVE STEM(S) - REMOVE A Tech: JAVIER SOLTERO (149)	Warrantly

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LABOR	
PARTS	
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SUBLET	
SHOP SUPPLIES	
HAZARDOUS MATERIALS	
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SPECIAL ORDER DEPOSIT	
DISCOUNTS	
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R/O Open Date	R/O Number
8/07/19	
R/O Close Date	Status
8/23/19	Reprint
Mileage In	Mileage Out
19395	19398
Service Advisor / Tag #	
JAVIER SOLTERO	

CALEXICO, CA			Work Phone	Vehicle Identification Number	
			Home Phone	3FA6P0HD1HR	
Year	Make	Model	Body	Color	License Number
2017	FORD	FUSION	SE FWD		
				Delivery Date	In-Service Date

DESCRIPTION OF SERVICE AND PARTS	AMOUNT
Installed 9001 7060381 63 :235/45R18 RI: VERIFIED THE CUSTOMERS CONCERN VISUAL FOUND ALL 4 TIRES WITH A CHUNKING CONDITION REPLACED ALL 4 TIRES RE TEST CHECK OK Qty: 4	Warranty

#3 * MR ENGIN: ENGINE MINOR ADDED OPERATION NO START CONDITION CHECK AND ADVISE Corrected by 10654C: (D02) (42) BATTERY - TEST, CHARGE, AND RE-TEST (10653/10654/1	Warranty
ADDED OPERATION Tech: JAVIER SOLTERO (149) Corrected by 10654C1: BATTERY - REPLACE (10653/10654/10655) - L	Warranty
ADDED OPERATION Tech: JAVIER SOLTERO (149) Installed BAGM 48H6 760 (FP):BATTERY RI: VERIFIED THE CUSTOMERS CONCERN PERFORMED CHARGING SYSTEM TEST THE BATTERY FAILED THE LOAD TEST Qty: 1	Warranty Warranty

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LABOR	.00
PARTS	.00
DEDUCTIBLE	.00
SUBLET	.00
SHOP SUPPLIES	.00
HAZARDOUS MATERIALS	.00
SALES TAX OR TAX I.D.	.00
SPECIAL ORDER DEPOSIT	.00
DISCOUNTS	.00
TOTAL DUE	.00

NO RETURN ON ELECTRICAL OR SAFETY ITEMS OR SPECIAL ORDERS.

X

RQ22-004
Lawsuits and Non-Litigated Claims Log

Ford File Number	Category	Vehicle Owner or Fleet Name, email address and telephone number	Vehicle Owner or Fleet street address, city, state, and Zip code	VIN	Make, Model, Model Year	Mileage	Incident Date	Report or claim date (MM/DD/YYYY)	Crash Alleged	Fire Alleged	Property Damage Alleged	Alleged Injuries	Alleged Fatalities
██████████	Property Damage Claim	██████████	██████████ SPRINGDALE, MD ██████████	3LN6L2G92DF██████████	2013 Lincoln MKZ	11,780	05/05/2015	02/14/2017	Y	N	Y	0	0
██████████	Property Damage Claim	██████████	██████████ ONTARIO, CA ██████████	3FA6P0H77FF██████████	2015 Ford Fusion	46,614	05/28/2019	06/18/2019	N	Y	Y	0	0
██████████	Consumer Complaint	██████████	██████████ LONG BEACH, CA ██████████	3FA6P0HD6GF██████████	2016 Ford Fusion	50,344	01/23/2019	06/26/2019	N	N	N	0	0
██████████	Consumer Complaint	██████████	██████████ CALEXICO, CA ██████████	3FA6P0HD1HF██████████	2017 Ford Fusion	27,643	02/07/2020	10/08/2020	N	N	N	0	0