



CLERKIN, SINCLAIR & MAHFOUZ, LLP

ATTORNEYS AT LAW

[REDACTED]

FCA Group North America
PO BOX 21-8004 Ref [REDACTED]
Auburn Hills, MI 48321

Re: USAA General Indemnity Company v. FCA Group North America

Insurance Subrogee of Unliquidated Tort Claim for Subrogation Damage

Your Reference No.: [REDACTED]

Our File No.: [REDACTED]

Date of Loss: [REDACTED]

Area of Loss: [REDACTED]

Unliquidated Tort Claim Amount: \$51,369.69

Dear FCA Group North America:

We are writing on behalf of USAA General Indemnity Company concerning the tort claim detailed above, which was placed with us for purposes of investigating your potential liability with regard to this claim.

The total damages my client has incurred to date is \$51,369.69. I ask that you please contact our firm immediately to discuss resolution of this unliquidated tort claim.

Unless you, within ten (10) days after the receipt of this notice, dispute the validity of this claim, or any portion thereof, we will assume the claim to be valid. Once the ten (10) days have passed, we may initiate litigation proceedings to seek a judgment against you.

If you wish to resolve this unliquidated tort claim or have additional questions, please contact me at (619) 308-6550 upon receipt of this letter.

Regards,

Clerkin, Sinclair & Mahfouz, LLP

Patrick Clerkin, Esq.

2929 NORTH CENTRAL EXPRESSWAY
SUITE 320
RICHARDSON, TX 75080
619-308-6550

WWW.CLERKINLAW.COM



CLERKIN, SINCLAIR & MAHFOUZ, LLP

ATTORNEYS AT LAW

[REDACTED]

FCA US LLC
PO BOX 21-8004
Auburn Hills, MI 48321 8004
Chryslersi@fcagroup.com

Re: USAA General Indemnity Company v. FCA US LLC

Insurance Subrogee of Unliquidated Tort Claim for Subrogation Damage

Your Reference No.: [REDACTED]

Our File No.: [REDACTED]

Date of Loss: [REDACTED]

Area of Loss: [REDACTED]

Unliquidated Tort Claim Amount: \$51,369.69

VIN: [REDACTED]

Make: 2020 JEEP Gladiator Rubicon 4WD

Dear FCA US LLC:

We are writing on behalf of USAA General Indemnity Company concerning the tort claim detailed above, which was placed with us for purposes of investigating your potential liability with regard to this claim.

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If you wish to resolve this unliquidated tort claim or have additional questions, please contact me at (702) 623-8557 or (arlaeigh@clerkinlaw.com) upon receipt of this letter.

Regards,

Clerkin, Sinclair & Mahfouz, LLP

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FCA US LLC
PO BOX 21-8004
Auburn Hills, MI 48321 8004
Chryslersi@fcagroup.com

Re: USAA General Indemnity Company v. FCA US LLC

Insurance Subrogee of Unliquidated Tort Claim for Subrogation Damage
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Our File No.: [REDACTED]
Date of Loss: [REDACTED]
Area of Loss: [REDACTED]
Unliquidated Tort Claim Amount: \$51,369.69
VIN: [REDACTED]
Make: 2020 JEEP Gladiator Rubicon 4WD

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CLERKIN, SINCLAIR & MAHFOUZ, LLP

ATTORNEYS AT LAW



ELECTRONIC MAIL

FCA Group North America
chryslersi@stellantis.com

Re: USAA General Indemnity Company v. Kiwi Master, FCA US LLC

NOTICE OF DESTRUCTIVE VEHICLE EXAMINATION

Our File No.:
Our Client's Insured:
Date of Fire Loss:
Area of Fire Loss:
Your Case No.:
VIN:



Dear FCA US LLC:

As you are aware, we have been retained on behalf of USAA General Indemnity Company (hereinafter referred to as "USAA") to pursue a subrogation claim against Kiwi Master for its defective products, a KIWI MASTER 9 inch Round LED Headlights Halo DRL, which may have caused the fire loss to our insured's 2020 JEEP Gladiator Rubicon 4WD, VIN: [REDACTED]. As of the date of this letter, my client has incurred a loss of \$51,369.69 and it intends to seek the amount of that loss. Moreover, there may be continuing liability for any additional claim amounts which may be paid by my client in the future for this loss.

The vehicle has been preserved and we intend on conducting a non-destructive vehicle inspection on **October 21, 2022 at 9::00 a.m., IAA Boston, 2 Going Rd, Shirley, MA 01464, Stock [REDACTED]**. The inspection will be documented and any relevant evidence may be transported to a secure location in the surrounding area

for potential subsequent testing. You, or a representative from your insurance company, are invited to attend the vehicle inspection. Should you have any questions or concerns, or would like to coordinate the, scheduling of the examination, please contact my office at (702) 623-8557 upon receipt of this letter. If you do not respond within 10 days of this letter, we will assume you do not want to attend the exam and will move forward without your participation.

Sincerely yours,

/s/Patrick Clerkin

Patrick Clerkin, Esq.
Clerkin, Sinclair & Mahfouz, LLP

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RICHARDSON, TX 75080
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CLERKIN, SINCLAIR & MAHFOUZ, LLP

ATTORNEYS AT LAW

September 22, 2022

ELECTRONIC MAIL

FCA Group North America
chryslersi@stellantis.com

Re: USAA General Indemnity Company v. Kiwi Master, FCA US LLC

NOTICE OF DESTRUCTIVE VEHICLE EXAMINATION

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Our Client's Insured:

Date of Fire Loss:

Area of Fire Loss:

Your Case No.:

VIN:

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Sincerely yours,

/s/Patrick Clerkin

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