

FORD MOTOR COMPANY (FORD) RESPONSE TO PE24-027 Part 1

Request 2

State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles and peer vehicles, separately:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings, both pending and closed, where Ford is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts “a” through “f,” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f,” provide a summary description of the alleged problem and causal and contributing factors and Ford’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Answer

The requested number of items identified in searches for the alleged defect are as follows:

Subject Vehicles	Consumer Complaint	Field Report	Crash	Injury	Fatality	Property Damage	Third Party Arbitration	Lawsuits	Grand Total
<b>EDGE</b>									
<b>2015</b>									
A1 - Rear Brake Hose Leak	4	2	0	0	0	0	0	0	6
<b>2016</b>									
A1 - Rear Brake Hose Leak	1	1	0	0	0	0	0	0	2
B - Ambiguous Brake System Tube or Hose Leak	1	0	0	0	0	0	0	0	1
<b>2017</b>									
A1 - Rear Brake Hose Leak	6	1	0	0	0	0	0	0	7
A2 - Rear Brake Hose Bubble or Bulge	1	0	0	0	0	0	0	0	1
<b>Grand Total</b>	<b>13</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>17</b>
<b>Peer Vehicles</b>									
<b>MKX / NAUTILUS</b>									
<b>2017</b>									
A1 - Rear Brake Hose Leak	4	0	0	0	0	0	0	0	4
<b>Grand Total</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>

The following categorizations were used in the review of reports located in each of these searches:

<b>Category</b>	<b>Definition</b>
A1	Rear Brake Hose Leak
A2	Rear Brake Hose Bubble or Bulge
B	Ambiguous Brake System Tube or Hose Leak

Owner Reports: Records identified in a search of the Global Contact Center Technology (GCCT) database, as described in Ford's response to Request 4, were reviewed for relevance and sorted in accordance with the categories described above. The relevant owner reports identified in this search for the alleged defect are provided in the GCCT portion of the database contained in Ford's response to Request 3. The categorization of each report is identified in the "Category" field.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Ford's response to Request 4, were reviewed for relevance and sorted in accordance with the categories described above. The relevant field reports identified in this search for the alleged defect are provided in the CQIS portion of the database contained in Ford's response to Request 3. The categorization of each report is identified in the "Category" field.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect in a subject vehicle, Ford has gathered claim and lawsuit information maintained by Ford's OGC. Ford's OGC is responsible for handling various legal matters, including product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company.

Lawsuits and claims gathered in this manner were reviewed for relevance and categorized in accordance with the categories described above.

We are providing the requested detailed information, where available, for the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, provided in Ford's response to Request 3. The number of relevant lawsuits and claims identified is also provided in this log. To the extent available, copies of complaints or first notices relating to matters shown on the log are provided in Ford's response to Request 4. To the extent available, GCCT reports related to the matter on the log are provided in Ford's responses to Requests 3 and 4. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Crash/Injury/Fatality/Fire/Property Damage Incident Claims:

Ford has not identified any owner reports or legal claims alleging accident or injury potentially pertaining to the alleged defect in subject or peer vehicles.