

EVANS & DIXON^{LLC}

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INFORMATION REDACTED
PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C.
552(B)(6)

IMMEDIATE ATTENTION REQUIRED

March 14, 2022

SENT VIA CERTIFIED U.S. MAIL & EMAIL

FCA US LLC

Attn: Legal Department

PO Box 21-8004

Auburn Hills, MI 48321-8004

EMAIL: customerservicesinternational@fcagroup.com

In re: Pekin Ins. Co. a
Date of Loss:
Loss Address: Centralia, Illinois
Vehicle VIN:
Our File No.:

Dear Legal Department:

Please be advised that Evans & Dixon, LLC has been retained on behalf of Pekin Insurance Company, insurer of [REDACTED], in regard to the fire that occurred to his 2017 Chrysler Pacifica Hybrid Electric Vehicle, identified by [REDACTED] ("Subject Vehicle") while parked in his garage in Centralia, Illinois on [REDACTED].

At around 10:45 pm on [REDACTED], Mr. Ferguson plugged in the Subject Vehicle to charge the main battery and [REDACTED] charger at 32 amps. He received a Uconnect email notification that the vehicle [REDACTED] and later received [REDACTED] email notification that the vehicle was charged and read [REDACTED] August 26. No other emails were received by Mr. Ferguson related to [REDACTED]. Around 4:15 am, Mr. Ferguson was asleep in the upstairs bedroom and woke up to the sound of an explosion in the garage. He opened the interior door accessing the garage from the hallway and saw the Subject Vehicle on fire. Mr. Ferguson was contacted by the alarm company at 4:15 am and the Centralia Fire Department was dispatched at 4:16 am, arriving on scene at 4:35 am.

Our investigation determined that the fire originated at the Subject Vehicle and ignited nearby combustible materials, spreading therefrom. The Subject Vehicle was still under the

St. Louis

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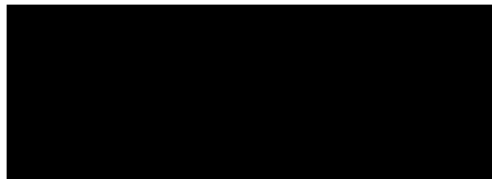
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original manufacturer's warranty at the time of the fire as only about 55,000 miles had been driven on it. Subsequent to the investigation, information was received by Mr. Ferguson indicating the Subject Vehicle was being recalled for an unknown defect where the known problem was that some 2017-2018 Chrysler Pacifica Plug-In Hybrid Vehicles experienced fires while being charged in the "off" position. As of February 4, 2022, there are at least 12 claims of similar fires in similar vehicles. See Recall 22V-077.

As a result of said fire, the Subject Vehicle was considered to be a total loss and my client paid Mr. Ferguson a total of \$35,251.65 for the loss, including his \$100 deductible. The Summary of Payment sheet is being attached for your review. Similarly, State Farm insured the house where the fire spread to and is being represented by Alyssa Haaker at Drake, Narup & Mean, P.C., who is being cc'd on this letter. Ms. Haaker will be representing State Farm separately for those damages.

Demand is hereby made in the amount of **\$35,251.65**. This demand will remain open for **30 days**. If we are unable to amicably resolve this matter, we will have no choice but to file the attached lawsuit to recover the sums paid. I look forward to hearing from you to discuss this matter further.

Very truly yours,



Matthew M. McArthur

MMM/tld

#:

cc: Drake, Narup & Mead, P.C.
Attn: Alyssa Haaker, via email only
haaker@dnmpc.com