

RICHARD H. NARUP
RANDALL A. MEAD
CHRISTIAN D. BISWELL
STEVEN C. WARD
JEFFREY J. COCAGNE
ALYSSA L. HAAKER
DAVID L. DRAKE, RETIRED

DRAKE
NARUP
MEAD
ATTORNEYS

107 E. ALLEN STREET
SPRINGFIELD, ILLINOIS 62704
(217) 528.9776 PHONE
(217) 528.9401 FAX
WWW.DNMPC.COM

IMMEDIATE ATTENTION REQUIRED

March 14, 2022

Sent via Certified U.S. Mail Tracking No. & EMAIL

FCA US LLC
Attn: Legal Department
PO Box 21-8004
Auburn Hills, MI 48321-8004
EMAIL: customerservicesinternational@fcagroup.com

RE: State Farm Fire & Casualty Company a/s/o [REDACTED] v. Chrysler
State Farm Insured [REDACTED]
Date of Loss: [REDACTED]
Our Ref. No.: [REDACTED]

To whom it may concern,

Please be advised this law firm has been retained to represent State Farm Fire & Casualty Insurance Company, insurer of [REDACTED] in connection with a fire that occurred to his 2017 Chrysler Pacifica Hybrid Electric Vehicle, identified by VIN [REDACTED] ("Subject Vehicle") on [REDACTED] at the residence of [REDACTED] in Centralia, Illinois.

On [REDACTED] at around 10:45 p.m., [REDACTED] plugged in the Subject Vehicle to charge the main battery and set the charger at 32 amps. At 12:38 a.m. on August 26, 2021, he received a Uconnect email notification that the vehicle was finished charging. No other emails were received by [REDACTED] related to the charging of the vehicle. [REDACTED] was asleep in the upstairs bedroom and woke up to the sound of an explosion in the garage around 4:15 a.m. He opened the interior garage door and saw the Subject Vehicle on fire. The alarm company contacted [REDACTED] at 4:15 a.m. and the [REDACTED] Fire Department was dispatched at 4:16 a.m., arriving on scene at 4:35 a.m.

Our investigation determined that the fire originated at the Subject Vehicle and ignited nearby combustible materials, spreading throughout the garage and attached house. The Subject Vehicle was still under the 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 [REDACTED] indicating the Subject Vehicle was being recalled for an unknown defect where the known problem was that 2017-2018 Chrysler Pacifica Plug-In Hybrid Electric Vehicles have experienced fires while being charged in the "off" position. As of February 4, 2022, there are at least 12 claims of similar fires in those vehicles. See Recall 22V-077.

As a result of said fire, the garage where the Subject Vehicle was parked, and the connected house sustained significant damage. To date, my client has paid [REDACTED] a total of \$601,649.65 for the loss. See below chart. I am able to provide supplemental supporting documentation, if requested. Mr. Ferguson is still residing in temporary housing ergo the final loss number is not settled yet.

<u>Total estimated Amount:</u>	
Coverage A Structure Damage	\$590,262.16
Coverage B Personal Property	\$304,406.92
Coverage C Loss of Use	\$28,899.99
Total Damages:	\$923,569.07
<u>Total Paid to Date:</u>	
Coverage A Structure Damage	\$456,414.16
Coverage B Personal Property	\$128,495.70
Coverage C Loss of Use	\$16,739.79
Total Paid:	\$601,649.65

Similarly, Pekin Insurance insured the Subject Vehicle and is being represented by Matthew M. McArthur at Evans & Dixon LLC, who is being cc'd on this letter. Mr. McArthur is representing Pekin Insurance separately for those damages.

Demand is hereby made in the amount of **\$601,649.65**. 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 a lawsuit to recover the sums paid. I look forward to hearing from you to discuss this matter further.

Very truly yours,

DRAKE, NARUP & MEAD, P.C.

By: [REDACTED]

Alyssa L. Haaker
haaker@dnmpc.com

CC: Angel Vincent - statefarmfireclaims@statefarm.com
Matthew M. McArthur via email mmcarthur@evans-dixon.com