

**LAW OFFICES OF
COZZI, MAREK & PARKER**

EMPLOYEES OF LIBERTY MUTUAL GROUP, INC.

MAILING ADDRESS

LAW OFFICES OF
COZZI, MAREK & PARKER
P.O. Box 7217
LONDON, KY 40742

PHYSICAL ADDRESS

225 W. WASHINGTON STREET
SUITE 500
CHICAGO, IL 60606
TELEPHONE: (312) 726-6317
FAX: (603) 334-9766

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

LAWRENCE P. COZZI
GARY A. MAREK
KAMILAH A. PARKER

SABA AZAM
DEBORAH A. BENZING
ANDREW S. BRAVERMAN
TIMOTHY D. CRANE
RYAN GILLESPIE
KEVIN GOTTLIEB
BRIAN J. HOLMES
JAMES W. JANNISCH

BRADLEY S. LICHTMAN
MORGEN A. MUELLER
DAVID J. OLMSTEAD
SARAH PEACEMAN
NICHOLAS J. SCARPELLI
STEVEN A. SCHUETZ
TODD N. SEVERNS
AISHA SHOTANDE
RICHARD J. SLEDZ

March 8, 2022

Via UPS and Facsimile (248-512-3114)

Chrysler (FCA US, LLC)

[REDACTED]

Attn.: Claims/Legal

1000 Chrysler Dr.

Auburn Hills, MI 48326-2757

Via UPS

LG Energy Solution

Parc1 Tower 1

108 Yeoui-daero

Yeongdeungpo-gu

Seoul, Korea

Via UPS

Mr. Electric of Fairfield County

c/o Sheridan Electrical LLC

6560 Winbarr Way

Canal Winchester, OH 43110

Via UPS

LG Energy Solution Michigan Inc.

c/o Corporation Services Company

251 Little Falls Dr.

Wilmington, DE 19808

RE: Liberty Mutual Personal Ins. Co. a/s/o [REDACTED] v. FCA US, LLC, et al.

File Number: [REDACTED]

Date of Loss: [REDACTED]

Loss Location: [REDACTED], OH [REDACTED]

To Whom It May Concern:

Our firm has been retained to represent the interests of Liberty Mutual Personal Insurance Company and its insured, Mr. [REDACTED], as a result of a fire that occurred on or about [REDACTED], at Mr. [REDACTED] home located at [REDACTED], OH [REDACTED]. Damages are still being estimated but are likely to exceed \$1,000,000.

Our preliminary investigation indicates that the fire originated within the garage of Mr. [REDACTED] home. More specifically, the fire is believed to have originated within the insured's 2017 Chrysler Pacifica Plug-In Hybrid Electric Vehicle (VIN #: [REDACTED]), which was parked in the garage. We further understand that LG Energy Solution (or its predecessor, LG Chem) designed, assembled, manufactured, distributed and sold the batteries used in 2017 Chrysler Pacifica plug-in hybrid vehicles. Finally, we understand that Mr. Electric of Fairfield County installed a dedicated 220-volt circuit for use in recharging the vehicle. We are, therefore, placing all of you on

notice of this loss and of the upcoming joint scene examination, which we have scheduled to take place on **Thursday, April 7, 2022 commencing at 9:00AM (EDT)** at the loss location. Be advised the scene examination will be destructive; this will be your one and only opportunity to examine the scene as it exists at present. Following the exam, the vehicle will be removed by Geico (which insures Mr. [REDACTED] vehicles) or Liberty Mutual and demolition of the remains of the home will commence.

Please contact the undersigned at your earliest convenience to advise whether you, your attorneys, insurers, or agents wish to participate in the ongoing investigation of this loss, including the upcoming scene examination. If you are insured for losses of this kind, we would appreciate it if you would pass this letter along to your insurer *immediately* and ask that it get in touch with the undersigned. Also, if there are any additional parties who should be placed on notice, including any component part manufacturers or suppliers, please forward this letter or contact the undersigned and provide contact information for the additional party(ies).

Your prompt attention to this matter is appreciated. Thank you for your cooperation.

Very truly yours,



Gary A. Marek
GAM:gm
Direct Dial: (312) 619-5013
Email Address: gary.marek@libertymutual.com

cc: Mr. Benjamin Kalnicky
Ms. Melanie Frazier
Ms. Miranda Hewlett
Mr. Chuck Strader (O&C)
Mr. Brad O'Neal, P.E.