

Preliminary Statement

On April 30, 2009, Chrysler LLC, the entity that manufactured and sold the certain vehicles that may be discussed in this Information Request, filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

On June 10, 2009, Chrysler LLC sold substantially all of its assets to a newly formed company later known as Chrysler Group LLC. Pursuant to the sales transaction, Chrysler Group LLC assumed responsibility for safety recalls pursuant to the 49 U.S.C. Chapter 301 for vehicles that were manufactured and sold by Chrysler LLC prior to the June 10, 2009, asset sale.

On June 11, 2009, Chrysler LLC changed its name to Old Carco LLC. The assets of Old Carco LLC that were not purchased by Chrysler Group LLC, as well as the liabilities of Old Carco that were not assumed, remain under the jurisdiction of the United States Bankruptcy Court – Southern District of New York (In re Old Carco LLC, et al., Case No. 09-50002).

Effective December 15, 2014, changed its name to FCA US LLC (“FCA US”).

FCA US makes the following clarification to this Information request:

- On April 17, 2025, FCA US requested an extension for the responses to questions 1, 2, 3, 4, 5, 22, 23 and 24. On April 24, 2025, NHTSA granted this request.
- This initial submission made on April 25, 2025 contains full responses to questions 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20 and 21.
- May 9, 2025: This final submission contains full responses to the questions included in the April 17, 2025 extension request; Questions 1, 2, 3, 4, 5, 22, 23, and 24.
- November 04, 2025: This first supplemental response contains updates to Questions 2, 3, 4, 5, and 6 updated files for new records filed from March 13, 2025 and September 11, 2025 as requested by Question 14 in PE24-024.
- May 04, 2026: This second supplemental response contains updates to Questions 2, 3, 4, 5, and 6 updated files for new records filed from September 12, 2025 and March 11, 2026 as requested by Question 14 in PE24-024.

2. State the number of each of the following, received by FCA, or of which FCA is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury or fatality;
 - d. Reports involving a fire or thermal event;
 - e. Property damage claims; and
 - f. Third-party arbitration proceedings, both pending and closed, where FCA is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which FCA is or was a defendant or codefendant.

For subparts “a” through “g,” 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 “g,” provide a summary description of the alleged incident, to include description and ages of alleged injuries/fatalities, vehicle location within or outside structure, time of the fire or thermal event, estimated amount of property damage, causal and contributing factors, and FCA’s assessment of the incident, with a summary of the significant underlying facts and evidence. For items “f” and “g,” identify the parties to the action, as well as the caption, court, docket number, description of resolution (if closed), date on which the complaint or other document initiating the action was filed, and provide any associated documents containing objective, analytical, or technical information.

- A2. **April 25, 2025 Response:** FCA US will submit its response to **Request 2** with the May 9, 2025 Response.

May 9, 2025 Response: FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to the Request. In compiling its response to this Request, FCA US separated responsive reports into two categories for both Subject Vehicles and Peer Vehicles: 1) those reports that relate to the Alleged Defect in the Subject Component; and 2) those reports that may relate to the Alleged Defect. Information related to these two categories of reports comprises FCA US’ responses to subparts (a) through (g) of this Request. That information is located in **ENCLOSURE 02** and titled **PE24-024_SUBJECT REPORTS.pdf** and **PE24-024_PEER REPORTS.pdf**. For question 2, subparts (c) through (g), FCA US has provided the request for additional information within the database located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJECT.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER.accdb**.

November 04, 2025 Supplemental 1 Response: FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to the Request. In

compiling its response to this Request, FCA US separated responsive reports into two categories for both Subject Vehicles and Peer Vehicles: 1) those reports that relate to the Alleged Defect in the Subject Component; and 2) those reports that may relate to the Alleged Defect. Information related to these two categories of reports comprises FCA US' responses to subparts (a) through (g) of this Request. That information is located in **ENCLOSURE 02** and titled **PE24-024_SUBJECT REPORTS_S1.pdf** and **PE24-024_PEER REPORTS_S1.pdf**. For question 2, subparts (c) through (g), FCA US has provided the request for additional information within the database located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJ_S1.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER_S1.accdb**.

May 04, 2026 Supplemental 2 Response: FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to the Request. In compiling its response to this Request, FCA US separated responsive reports into two categories for both Subject Vehicles and Peer Vehicles: 1) those reports that relate to the Alleged Defect in the Subject Component; and 2) those reports that may relate to the Alleged Defect. Information related to these two categories of reports comprises FCA US' responses to subparts (a) through (g) of this Request. That information is located in **ENCLOSURE 02** and titled **PE24-024_SUBJECT REPORTS_S2.pdf** and **PE24-024_PEER REPORTS_S2.pdf**. For question 2, subparts (c) through (g), FCA US has provided the request for additional information within the database located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJ_S2.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER_S2.accdb**.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. FCA's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
 - d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
 - e. Vehicle's 17-character VIN;
 - f. Vehicle's make, model and model year (please use distinct fields for each data type);
 - g. Vehicle's mileage at time of incident (numeric data type);
 - h. Incident date (MM/DD/YYYY);
 - i. Report or claim date (MM/DD/YYYY);
 - j. Whether a crash is alleged;
 - k. Whether a fire is alleged;
 - l. Whether a thermal event is alleged;
 - m. The vehicle operating conditions when the fire or thermal event was first detected;
 - n. The area of origin of the fire or thermal event (e.g., upper-left hand engine compartment), state the specific components at the origin, if known;
 - o. The alleged cause of the fire or thermal event;
 - p. A summary of all vehicle modifications or service factors OEM believes could have caused or contributed to the incident;
 - q. Whether FCA or FCA contractor/consultant investigated the incident;

- r. FCA or FCA contractor/consultant assessment of the most likely cause of the fire or thermal event;
- s. Whether CT scans, X-ray imagery, or similar imagery were acquired;
- t. Whether video of the incident exists;
- u. Diagnostic trouble codes or other codes present on the vehicle after the fire or thermal event, if available;
- v. Whether property damage is alleged;
- w. Number of alleged injuries, if any;
- x. Number of alleged fatalities, if any; and
- y. Whether vehicle was repurchased by FCA.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

A3. **April 25, 2025 Response:** FCA US will submit its response to **Request 3** with the May 9, 2025 Response.

May 9, 2025 Response: FCA US' responses to subparts (a) through (y) of this Request are located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJECT.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER.accdb**.

November 04, 2025 Supplemental 1 Response: FCA US' responses to subparts (a) through (y) of this Request are located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJ_S1.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER_S1.accdb**.

May 04, 2026 Supplemental 2 Response: FCA US' responses to subparts (a) through (y) of this Request are located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJ_S2.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER_S2.accdb**.

4. **Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method FCA used for organizing the documents. Describe in detail the search methods and search criteria used by FCA to identify the items in response to Request No. 2. 'For each vehicle identified in the responsive data to Request No. 2, provide a complete dealer service history within 6 months of (before and after) the alleged incident or report date (whichever is earliest) and report close date.**

A4. **April 25, 2025 Response:** FCA US will submit its response to **Request 4** with the May 9, 2025 Response.

May 9, 2025 Response: FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request. Documents related to each item within the scope of Request 2 were gathered using information such as vehicle model, model year, and a word search using words reasonably related to the reports sought by this Information

Request ("IR"). The keyword search criteria, as well as the categorization criteria, used in this search were submitted in the April 25, 2025 response- in **ENCLOSURE 6**. An eyes on review of the search results was then conducted to determine whether each returned record relates to, or may relate to, the Alleged Defect.

Copies of documents related to each item within the scope of Request No. 2 can be found in **ENCLOSURE 04**.

The customer complaint summaries are submitted in the file titled **PE24-024_CONSUMER AND CUSTOMER COMPLAINTS-SUBJECT.pdf** and **PE24-024_CONSUMER AND CUSTOMER COMPLAINTS-PEER.pdf** and the related documents are arranged in corresponding folders by complaint number. Legal summaries are contained in the file titled **PE24-024_LEGAL SUMMARIES.pdf**. Field reports are contained in the file titled **PE24-024_FIELD REPORTS-SUBJECT.pdf** and **PE24-024_FIELD REPORTS-PEER.pdf**. Service histories are contained in the files titled **PE24-024_WARRANTY DETAIL-SUBJECT.pdf**, **PE24-024_WARRANTY DETAIL-PEER.pdf**, **PE24-024_REPAIR ORDER DETAIL-SUBJECT.pdf** and **PE24-024_REPAIR ORDER DETAIL-PEER.pdf**.

November 04, 2025 Supplemental 1 Response: FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request. Documents related to each item within the scope of Request 2 were gathered using information such as vehicle model, model year, and a word search using words reasonably related to the reports sought by this Information Request ("IR"). The keyword search criteria, as well as the categorization criteria, used in this search were submitted in the April 25, 2025 response- in **ENCLOSURE 06**. An eyes-on review of the search results was then conducted to determine whether each returned record relates to, or may relate to, the Alleged Defect.

Copies of documents related to each item within the scope of Request No. 2 can be found in **ENCLOSURE 04**.

The customer complaint and field report summaries are submitted in the files titled **PE24-024_CUSTOMER_FIELD_SUBJECT_S1.accdb** and **PE24-024_CUSTOMER_FIELD_PEER_S1.accdb**. and the related documents are arranged in corresponding folders by complaint number. Legal summaries are contained in the file titled **PE24-024_LEGAL SUMMARIES_S1.pdf**. Service histories are contained in the files titled **PE24-024_SERVICE HISTORY_SUBJECT_S1.accdb** and **PE24-024_SERVICE HISTORY_PEER_S1.accdb**.

May 04, 2026 Supplemental 2 Response: FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request. Documents related to each item within the scope of Request 2 were gathered using information such as vehicle model, model year, and a word search using words reasonably related to the reports sought by this Information Request ("IR"). The keyword search criteria, as well as the categorization criteria, used in this search were submitted in the April 25, 2025 response- in **ENCLOSURE 06**. An eyes-on review of the search results was then conducted to determine whether each returned record relates to, or may relate to, the Alleged Defect.

Copies of documents related to each item within the scope of Request No. 2 can be found in

ENCLOSURE 04.

The customer complaint and field report summaries are submitted in the files titled **PE24-024_CUSTOMER_FIELD_SUBJECT_S2.accdb** and **PE24-024_CUSTOMER_FIELD_PEER_S2.accdb**. and the related documents are arranged in corresponding folders by complaint number. Legal summaries are contained in the file titled **PE24-024_LEGAL SUMMARIES_S2.pdf**. Service histories are contained in the files titled **PE24-024_SERVICE HISTORY_SUBJECT_S2.accdb** and **PE24-024_SERVICE HISTORY_PEER_S2.accdb**.

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by FCA to date that relate to, or may relate to, the alleged defect in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.
 - a. Separately, for each such claim, state the following information:
 - b. FCA's claim number;
 - c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
 - d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
 - e. 17-character VIN;
 - f. Vehicle's make, model and model year (please use distinct fields for each data type);
 - g. Repair date (MM/DD/YYYY);
 - h. Vehicle mileage at time of repair (numeric data type);
 - i. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
 - j. Labor operation number(s);
 - k. Problem code(s);
 - l. Diagnostic trouble code(s);
 - m. Replacement part number(s) and description(s);
 - n. Concern stated by customer;
 - o. Cause as stated on the repair order;
 - p. Correction as stated on the repair order;
 - q. Additional comments, if any, by dealer/technician relating to claim and/or repair; and
 - r. Whether vehicle was repurchased by FCA.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

- A5. **April 25, 2025 Response:** FCA US will submit its response to **Request 5** with the May 9, 2025 Response.

May 9, 2025 Response: FCA US' responses to this Request is located in **ENCLOSURE 05** and titled **PE24-024_WARRANTY DATA-SUBJECT.accdb** and **PE24-024_WARRANTY DATA-PEER.accdb**. DTCs are not stored in a separate database field but may be manually entered by a claim administrator into the narrative(s) of the warranty claim, if available.

November 04, 2025 Supplemental 1 Response: FCA US's search for this response for this Supplemental 1 request did not yield any responsive records.

May 04, 2026 Supplemental 2 Response: FCA US's search for this response for this Supplemental 2 request did not yield any responsive records.

6. Describe in detail the search methods and search criteria used by FCA to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

A6. **April 25, 2025 Response:** In order to identify the claims detailed in its response to Request No. 5, FCA US searched the normal repositories of information potentially responsive to this Request utilizing the same key words used for Question 2 as well as Labor Operations Codes ("LOPs"). The key words used can be found in **ENCLOSURE 06** and titled **PE24-024_Q2 KEYWORD SEARCH CRITERIA.pdf**. The LOPs used for this search can be found in **ENCLOSURE 07** and titled **PE24-024_LOP DESCRIPTIONS.pdf**.

November 04, 2025 Supplemental 1 Response: For the Supplemental 1 request, FCA US used the same keyword search criteria provided in the April 25, 2025 response. FCA US searched for responsive records to Request No. 5 inclusive and between the dates March 13, 2025 and September 11, 2025.

May 04, 2026 Supplemental 2 Response: For the Supplemental 2 request, FCA US used the same keyword search criteria provided in the April 25, 2025 response. FCA US searched for responsive records to Request No. 5 inclusive and between the dates September 12, 2025 and March 11, 2026.