



October 23, 2018

Mike Manley
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Re Potential Recall

Mr. Manley,

In May 2010, Scott Finnerman was involved in a front end collision where the drivers' airbag should have deployed in the 1999 Jeep Grand Cherokee that he was driving, but it did not. The passenger airbag did operate properly and the passenger was unharmed.

Mr. Finnerman sustained critical life threatening injuries requiring more than four years of difficult and serious surgeries. To this day, he is still disfigured and has additional ongoing issues directly related to this accident.

Mr. Finnerman's litigation with Fiat Chrysler Automobiles (FCA) over six years has produced evidence that the clock spring in his Jeep did not conduct electrical continuity (tested by Chrysler itself), rendering the driver's side airbag system inoperable. According to Chrysler's own written materials that lack of continuity can render the warning system in the dash inoperative, or intermittent. Through the course of litigation, Mr. Finnerman has discovered that the clock spring in the 1999 Jeep Grand Cherokee is the same or similar design as the 1998-2001 Chrysler Grand Caravan in which a recall of 1.29 million automobiles was ordered.

We present this evidence to you to find out whether there was a similar investigation into the Cherokee as the Caravan and why no recall was issued.

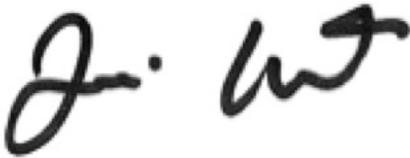
Mr. Finnerman's auto expert, Byron Bloch, has visually examined both clock springs. In his opinion, they are the same design and appear identical. FCA has simply stated, "the clock springs in these autos are not interchangeable and they have a different part number". Under examination, the only difference is that the plastic connector to the housing on the

Chrysler Grand Caravan and the paper part number glued to the outside were different. Otherwise, the clock spring itself appears to be the same.

This would not be the first time Chrysler has misled NHTSA and violated a consent decree. (RE 2015 Consent Decree)

We are happy to share further evidence and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Court". The signature is written in a cursive, fluid style.

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