<ul> <li>FORD MOTOR COMPANY, a Delaware corporation; and Does 1 through 10, inclusive, Defendants.</li> <li>2. Violation of California Unfair Competition La (Cal. Bus. &amp; Prof. Code §§ 17200);</li> <li>3. Violation of California's False Advertising La (Cal. Bus. &amp; Prof. Code §§ 17500, <i>et seq.</i>)</li> <li>4. Breach of Express Warranty (Based on California Law);</li> <li>5. Breach of Implied Warranty (California Commercial Code § 2314);</li> <li>6. Breach of Written Warranty Under the Magnuson-Moss Warranty Act (15 U.S.C. §§ 2301, <i>et seq.</i>);</li> <li>7. Fraudulent Concealment (Based on California)</li> </ul>		nt 1 Filed 06/10/19 PageID.1 Page 1 of 353
dsohn@sohnaw.com         Soin@ & Associates         16870 West Bernardo Drive, Suite 400         San Diego, California 92127         Telephone; (619) 237-7646         Facsimile:         (858) 759-4299         Attorneys for Plaintiff and the Putative Class         IN THE UNITED STATES DISTRICT COURT         FOR THE SOUTHERN DISTRICT OF CALIFORNIA         WILLIAM LESSIN, on behalf of himself and all others similarly situated,         Plaintiff,         v.         FORD MOTOR COMPANY, a Delaware corporation; and Does 1 through 10, inclusive, Defendants.         Defendants.         Claiber of Code §§ 17500, et seq.)         4. Breach of Express Warranty (Based on California Law);         5. Breach of Implied Warranty (California Commercial Code §§ 214);         6. Breach of Written Warranty Under the Magnuson-Moss Warranty Act (15 U.S.C. §§ 2301, et seq.);         7. Fraudulent Concealment (Based on California	rdm@mccunewright.comDavid C. Wright, State Bar No. 177468dcw@mccunewright.comMark I. Richards, State Bar No. 321252mir@mccunewright.comMcCune Wright Arevalo LLP3281 Guasti Road, Suite 100Ontario, California 91761Telephone: (909) 557-1250Facsimile: (909) 557-1275	
IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF CALIFORNIA WILLIAM LESSIN, on behalf of himself and all others similarly situated, Plaintiff, v. FORD MOTOR COMPANY, a Delaware corporation; and Does 1 through 10, inclusive, Defendants.	dsohn@sohnlaw.com SOHN & ASSOCIATES 16870 West Bernardo Drive, Suite 400 San Diego, California 92127	
IN THE UNITED STATES DISTRICT COURT         FOR THE SOUTHERN DISTRICT OF CALIFORNIA         WILLIAM LESSIN, on behalf of himself and all others similarly situated,       Case No.: '19CV1082 AJB WVG         Plaintiff,       CLASS ACTION COMPLAINT         v.       FORD MOTOR COMPANY, a Delaware corporation; and Does 1 through 10, inclusive, Defendants.       Class ACTION COMPLAINT         1. Violation of California Unfair Competition La (Cal. Bus. & Prof. Code §§ 1750, et seq.)       2. Violation of California's False Advertising La (Cal. Bus. & Prof. Code §§ 17500, et seq.)         3. Violation of Express Warranty (Based on California Law);       5. Breach of Implied Warranty (California Commercial Code § 2314);         6. Breach of Written Warranty Under the Magnuson-Moss Warranty Act (15 U.S.C. §§ 2301, et seq.);       7. Fraudulent Concealment (Based on California	Attorneys for Plaintiff and the Putative Class	
<ul> <li>WILLIAM LESSIN, on behalf of himself and all others similarly situated,</li> <li>Plaintiff,</li> <li>v.</li> <li>FORD MOTOR COMPANY, a Delaware corporation; and Does 1 through 10, inclusive, Defendants.</li> <li>Case No.: '19CV1082 AJB WVG</li> <li>CLASS ACTION COMPLAINT</li> <li>1. Violation of the California Consumer Legal Remedies Act (Cal. Civ. Code §§ 1750, et seq.)</li> <li>2. Violation of California Unfair Competition La (Cal. Bus. &amp; Prof. Code §§ 17200);</li> <li>3. Violation of California's False Advertising La (Cal. Bus. &amp; Prof. Code §§ 17500, et seq.)</li> <li>4. Breach of Express Warranty (Based on California Law);</li> <li>5. Breach of Implied Warranty (California Commercial Code § 2314);</li> <li>6. Breach of Written Warranty Under the Magnuson-Moss Warranty Act (15 U.S.C. §§ 2301, et seq.);</li> <li>7. Fraudulent Concealment (Based on California)</li> </ul>		
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<ul> <li>4. Breach of Express Warranty (Based on California Law);</li> <li>5. Breach of Implied Warranty (California Commercial Code § 2314);</li> <li>6. Breach of Written Warranty Under the Magnuson-Moss Warranty Act (15 U.S.C. §§ 2301, <i>et seq.</i>);</li> <li>7. Fraudulent Concealment (Based on California)</li> </ul>	Defendants.	3. Violation of California's False Advertising Law
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### **CLASS ACTION COMPLAINT**

Plaintiff William Lessin brings this action against Defendant Ford Motor Company ("Ford") and Does 1 through 10 (collectively "Defendants"), by and through their attorneys, individually and on behalf of all others similarly situated, and allege as follows:

### I INTRODUCTION

1. This is a class action lawsuit brought by Plaintiff on behalf of himself and a class of current and former owners and lessees of Ford F-250 and F-350 trucks, model years 2005 through 2019 (the "Class Vehicles").

2. This action arises from Defendant Ford's failure to disclose to Plaintiff and similarly situated consumers, despite their longstanding knowledge, that the Class Vehicles contain several latent defects in their suspension and/or steering linkage systems—which typically manifests itself during and shortly after the limited warranty period has expired—that cause the vehicle to start violent shaking, which can only be controlled by a sudden substantial reduction of vehicle speed.

3. Significantly, the presence of this defect, resulting in the violent shaking of the vehicle, poses a safety risk to the operator and passengers of the Class Vehicles. The violent shaking of the vehicle can cause loss of control of the vehicle and difficulty steering while the Class Vehicles are in operation at any time and under typical driving conditions or speed. This exposes the driver and occupants of the Class Vehicles, as well as others who share the road with them, to an increased risk of accident, injury, or death. As discussed further herein, numerous owners and lessees of the Class Vehicles, thus placing themselves and those around them in immediate danger and seriously risking the lives of its consumer and other vehicle occupants on the road.

4. Not only did Defendant actively conceal the fact that particular components within the Class Vehicles' suspension are prone to failure, it did not reveal that the existence of the defect would diminish the intrinsic and resale value of the Class Vehicles and lead to the safety concerns described herein.

5.Defendant has long been aware of the defect described herein, yet Defendant has8routinely refused to repair the Class Vehicles without charge when the defect manifests. Indeed, in many

cases Defendant has even refused to disclose the existence of the defect when Class Vehicles displaying symptoms consistent with the defect are brought in for service, instead choosing to recommend costly repairs.

6. Many other owners and lessees of the Class Vehicles have communicated with Defendant and/or its agents to request that they remedy and/or address the defect and/or resultant damage at no expense. Defendant has routinely failed to do so even within the warranty period.

7. Not only has Defendant refused to take any action to correct this concealed defect when it manifests in the Class Vehicles outside of the warranty period, in many instances, it required owners to pay for purported fixes for this problem when it manifested within the warranty period. Because the defect can manifest shortly outside of the warranty period for the Class Vehicles–and given Defendant's knowledge of this concealed, safety-related defect–Defendant's attempt to limit the warranty with respect to the suspension defect is unconscionable and unenforceable here.

8. Despite notice and knowledge of the defect from the numerous complaints it has received, information received from dealers, National Highway Traffic Safety Administration ("NHTSA") complaints, and their own internal records, including pre-sale durability testing, Defendant has not recalled and/or offered an adequate suspension repair to the Class Vehicles, offered their customers suitable repairs or replacements free of charge, or offered to reimburse their customers who have incurred out-of-pocket expenses to repair the defect.

9. As a result of Defendant's unfair, deceptive and/or fraudulent business practices, owners and/or lessees of the Class Vehicles, including Plaintiff, have suffered an ascertainable loss of money and/or property and/or loss in value. The unfair and deceptive trade practices committed by Defendant were conducted in a manner giving rise to substantial aggravating circumstances.

10. Had Plaintiff and other Class Members known of the defect at the time of purchase or lease, they would not have bought or leased the Class Vehicles, or would have paid substantially less for them.

11. Plaintiff is also informed and believes, and on that basis alleges, that as the number of
complaints increased, and Class Members grew dissatisfied with the performance of the Class Vehicles,
Defendant was forced to acknowledge that the Class Vehicles suffer from an inherent defect.

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12. As a result of the defect and the monetary costs associated with attempting to repair the defect, Plaintiff and the Class Members have suffered injury in fact, incurred damages, and have otherwise been harmed by Defendant's conduct.

13. Accordingly, Plaintiffs bring this action to redress Defendants' violations of the consumer protection statutes of California and also seek recovery for Defendants' breach of express warranty, breach of implied warranty, breach of the duty of good faith and fair dealing, and common law fraud.

### **II JURISDICTION**

14. This Court has subject matter jurisdiction of this action pursuant to 28 U.S.C. § 1332 of the Class Action Fairness Act of 2005 because: (i) there are 100 or more class Members, (ii) there is an aggregate amount in controversy exceeding \$5,000,000, exclusive of interest and costs, and (iii) there is minimal diversity because at least one plaintiff and one defendant are citizens of different States. This court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367.

15. This Court has specific personal jurisdiction over Defendant because it is registered to conduct business in California, has purposefully availed itself of the benefits and protections of California by conducting continuously and systematically conducting substantial business in this judicial district, directing advertising and marketing materials to districts within California, and intentionally and purposefully placing Class Vehicles into the stream of commerce within the districts of California and throughout the United States with the expectation and intent that they would be purchased by consumers. Moreover, Plaintiff's causes of action all arise out of Defendant's contacts with the State of California.

# III VENUE

16. Venue is proper in this judicial district pursuant to 28 U.S.C. §1391 because Defendant transacts business in this District, is subject to personal jurisdiction in this District, and therefore is deemed to be citizens of this district. Additionally, there are one or more authorized Ford dealers within this District and Ford has advertised in this District and have received substantial revenue and profits from their sales and/or leasing of Class Vehicles in this district; therefore, a substantial part of the events and/or omissions giving rise to the claims occurred, in part, within this District.

-7-

## **IV PARTIES**

# A. Plaintiff William Lessin

17. Plaintiff William Lessin is a resident of San Diego, California. Plaintiff owns a 2011 Ford F-250, which he purchased in Poway, California, on July 23, 2010 (for the purposes of this paragraph "the Vehicle"). Prior to purchasing the Vehicle, Plaintiff reviewed the sticker placed on its window by Defendant. The window sticker advertised the various features of the Vehicle (such as the price, specifications, gas mileage, equipment and warranty details and crash test ratings) and Plaintiff relied on the advertisements contained within the window sticker when deciding to purchase the Vehicle. The window sticker did not state that the Vehicle suffered from any defects.

18. Plaintiff Lessin purchased (and still owns) the Vehicle, which is used for personal, family and/or household uses.

19. Plaintiff has presented the Vehicle to Mossy Ford of San Diego for repair on two occasions within a period of less than three months to correct the Defect (defined *infra* at  $\P$  26). On each occasion, Defendant has failed to provide an adequate remedy to the Death Wobble (defined *infra* at  $\P\P$  27-28), denied the existence of the Defect, and has refused to provide repair the Vehicle under warranty.

20. Plaintiff Lessin has suffered an ascertainable loss as a result of Defendant's omissions and/or misrepresentations associated with the Defect, including, but not limited to, out of pocket losses for repairs (approximately \$1,231.00), out of pocket losses for replacement parts (approximately \$375.75), diminished value of his vehicle, and other consequential damages.

21. Neither Defendant, nor any of its agents, dealers, or other representatives informed Plaintiff Lessin of the existence of the Defect prior to, or any time after, his purchase.

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# Defendant Ford Motor Company

22. Defendant Ford Motor Company is a corporation doing business in all 50 states and the District of Columbia and is organized under the laws of the State of Delaware, with its principle place of business in Dearborn, Michigan.

26 23. At all times relevant to this action, Ford manufactured, sold, and warranted the Class
27 Vehicles throughout the United States. Ford and/or its agents, divisions, or subsidiaries designed,
28 manufactured, and installed the steering linkage system/suspension on the Class Vehicles.

24. The true names and capacities of the Defendants sued herein as DOES 1 through 10, inclusive, are currently unknown to Plaintiff, who therefore sues such Defendants by such fictitious names. Each of the Defendants designated herein as a DOE is legally responsible in some manner for the unlawful acts referred to herein. Plaintiff will seek leave of Court to amend this Complaint to reflect the true names and capacities of the Defendant designated herein as DOES when such identities become known.

25. Based upon information and belief, Plaintiff alleges that at all times mentioned herein, each and every Defendant was acting as an agent and/or employee of each of the other Defendants, and at all times mentioned was acting within the course and scope of said agency and/or employment with the full knowledge, permission, and consent of each of the other Defendants. In addition, each of the acts and/or omissions of each Defendant alleged herein were made known to, and ratified by, each of the other Defendant.

## V FACTUAL ALLEGATIONS

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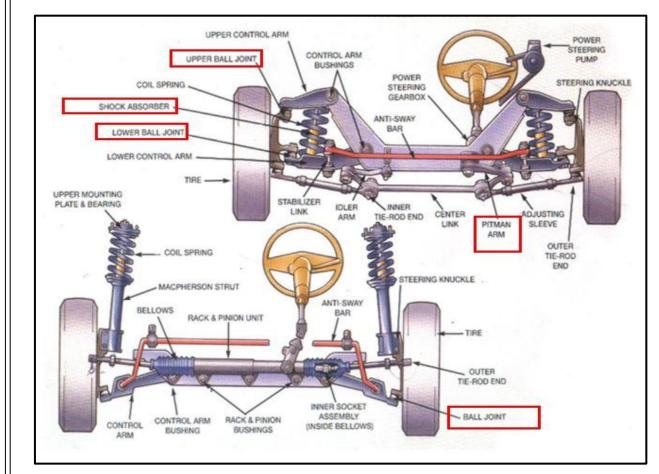
# The Class Vehicles Suffer from Dangerous Defects

26. The Class Vehicles suffer from one or more defects in their suspension and steering linkage systems (illustrated below at p. 10), including but not limited to, abnormal wearing and/or loosening of the track bar bushing (or "pitman arm"), damper bracket, the ball joints, control arms, shock absorbers, and/or struts, resulting in spontaneous and continuous violent shaking of the vehicle when encountering irregularities in the roadway surface at freeway speeds (collectively referred to as "the Defect" or "the Death Wobble Defect"). The Defect which may result in a loss of steering control, increases the Class Vehicles' risk of crash, thus affecting their safety and value.

27. The Defect causes the Class Vehicles to lose steering control during normal operation and poses a serious risk of crash without warning. As discussed below, Plaintiff and numerous Class Vehicle owners and lessees have reported that the Defect causes a sudden loss of steering control, a



violent front-end vibration and swaying of the Vehicles—an event that has been referred to as a "Death Wobble."<sup>1</sup>



28. The Death Wobble is typically triggered when the Class Vehicles are traveling at speeds above 50 miles per hour and one of the tires hits a groove or bump in the road. This causes a violent shaking of the vehicle, which can only be controlled by a sudden reduction of speed. The violent shaking of the vehicle and inability of the driver to retain full steering control poses a serious risk of injury to the occupants and the surrounding cars or pedestrians.

<sup>1</sup> See <u>http://www.trucktrend.com/how-to/chassis-suspension/1305dp-curring-death-wobble-tightening-up-your-steering/</u> (describing "death wobble" in detail) [last accessed June 10, 2019]; *see also* <u>https://www.youtube.com/watch?v=F7M2-DC59pk</u> (demonstrative video of the death wobble experience) [last accessed June 10, 2019].

29. Based on information and belief, the Defect is present at the time of sale of all Class Vehicles, and its first identifiable symptom—i.e. the Death Wobble—can manifest at any point after the point of purchase of a Class Vehicle.

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30. One of the most important sources of field data regarding this issue is the National Highway Traffic Safety Administration's Consumer Complaint Database. This publicly available database contains all motor vehicle-related consumer complaints submitted to NHTSA since January 2000. Consumers submit what is called a "Vehicle Owner Questionnaire" in which they asked to provide information that includes, the make, model, and model year of the vehicle, the approximate incident date, the mileage at which the incident occurred, whether the incident involved a crash or a fire, whether any persons were injured or killed in the incident, the speed of the vehicle at the time of the incident, and a description of the incident along with a description of the vehicle components they believe were involved in the incident. The majority of consumer complaints are submitted online at www.safercar.gov where consumers can input this information directly into the database through their computer. They can also submit complaints by telephone through the Auto Safety Hotline, through submitting a paper Vehicle Owner Questionnaire form, and by submitting consumer letters to NHTSA by mail. This information is then entered into NHTSA's ARTEMIS database where it can be searched and reviewed by the general public and vehicle manufacturers alike, by make, model, model year, and component. this database is promoted by NHTSA as a valuable consumer information tool.

31. From March 10, 2005, through February 6, 2019, a stunning 1,265 consumer complaints have been submitted to NHTSA describing having experienced the Death Wobble, in many cases on repeated occasions.

32. The extreme danger posed by the Death Wobble is evidenced by the fact that of these 1,265 consumer complaints regarding the Death Wobble:

- 12 resulted in accidents and injuries;
- another 82 resulted in a loss of control of the vehicle; and
- a staggering 148 consumer complaints expressed the fear that people would be killed as a result of the Death Wobble defect.

c	ase 3:19-cv-	01082-AJB-AHG	Document 1 353	Filed 06/10/19	PageID.12	Page 12 of
1	1.	NHTSA Consumer	<b>Complaints of</b> ]	Death Wobble Re	sulting in Cras	shes
2	33.	The following are the	e consumer com	plaints submitted t	o NHTSA when	re the Death
3	Wobble defec	et caused an accident: <sup>2</sup>				
4	-	, 2009 <b>NHTSA ID NU</b>	J <b>MBER: 10285</b>	130		
5		<b>: SUSPENSION</b> Number: 10285130				
6		e September 23, 2009 ocation CASTLEWO	DD. VA			
7	Vehicle Iden	tification Number N/A				
8	Summary of CRASHYes	Complaint				
9	FIRENo INJURIES0					
10	DEATHS0					
11		SUPERDUTY- WHIL R DIP IN THE ROAD				
12	VEHICLE IS	UNCONTROLLABL	E AND EXTRE	MELY DANGER	OUS. I WON'I	T LET ANY OF
13		Y MEMBERS RIDE IN TO DRIVE IT ON TH				
14	INTO THE D 1 Affected Pr	ITCH OR MEDIAN S	EVERAL TIMI	ES. *TR		
15		ouuci				
16	April 25, 200	7 NHTSA ID NUMBI	ER: 10188890			
17	Components	: STEERING				
18		Number: 10188890 e April 24, 2007				
19		ocation EASTCHEST tification Number 1F		**		
20	Summary of					
21	CRASHYes FIRENo					
22	INJURIES0 DEATHS0					
23	SHORTLY A	FTER I PURCHASEI				
24		ED A VIOLENT VIB R HITTING A SMALI		,		
25	FOR SERVIC	CE AND MENTIONEI WERE AN ANOMAI	O THIS EPISOI	DE. THE SERVIC	E MANAGER	ACTED AS
26		T SEEM TO BE THE	,			
27						
28	<sup>2</sup> The foregoin errors are attr by bold under	ng complaints are repro ibutable to the original lining.	oduced as they a author of the co	ppear on the NHT omplaint. Emphasi	SA website. An is added to orig	y typographical inal text is denoted

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1	THEN. WHEN I BROUGHT IT TO THE ATTENTION OF THE LOCAL SERVICE MANAGER, HE SAID THAT THIS IS COMMON AMONGST THESES LARGE PICKUP TRUCKS, AND JUST TAP
2	THE BRAKES UNTIL THE VIBRATIONS SUBSIDE, IT SHOULDN'T LAST LONG. YESTERDAY
3	I WAS TRAVELING AT ABOUT 60 MILES AN HOUR ON THE HIGHWAY, WHEN I WENT OVER A SEWER GRATE IN THE LEFT LANE. THE VIBRATION BECAME SO VIOLENT THAT
4	I HAD NO CONTROL OF THE STEERING AT ALL. I NARROWLY AVOIDED A COLLISION WITH A FUEL TRUCK AND SEVERAL OTHER CARS ON MY WAY OFF THE ROAD AND
5	INTO WOODS CAUSING MULTIPLE TIRE DAMAGE, AND SUFFERING DENTS AND
6	DAMAGE TO THE VEHICLE. I THANK GOD NO ONE WAS HURT, INCLUDING ME. I WAS ABLE TO DRIVE THE TRUCK AWAY AFTER CHANGING THE TIRES AND CLEANING UP
7	THE MESS FROM MY PERSONAL PROPERTY BEING TOSSED AROUND THE CABIN. NOT ONLY DID I LOOSE STEERING BUT, I WAS SURPRISED THAT SUCH A VIOLENT EPISODE
8	DID NOT DEPLOY THE AIR BAGS. I RETURNED TODAY TO THE DEALER WITH MY
9	TRUCK. THE SERVICE MANAGER HAD BEEN REPLACED, WITH A NEW ONE. WHEN I INFORMED HIM OF THE SITUATION HE CHECKED THE COMPUTER FOR MY RECORDS
10	AND MAGICALLY HE WAS ABLE TO FIND EVERY OTHER RECORD OF SERVICE AND REPAIRS, EXCEPT THE STEERING COMPLAINTS. TOMORROW, THE 26TH, I HAVE AN
11	APPOINTMENT WHERE I HOPE TO HAVE THIS CORRECTED. ALTHOUGH THIS SERVICE
12	MANAGER SAYS HE HASN'T HEARD OF ANY PROBLEMS WITH THESE TRUCKS. I WAS SEARCHING THE INTERNET AND FOUND MULTIPLE COMPLAINTS ON
13	DIFFERENT SITES, INCLUDING THE ONE THAT MADE REFERENCE TO YOUR SITE.
14	THROUGH INSURANCE, I HOPE THAT THERE WOULD BE SOME TYPE OF LIABILITY TO THE FORD MOTOR COMPANY. *JB
15	1 Affected Product
16	
17	August 29, 2008 NHTSA ID NUMBER: 10240263 Components: STEERING, TIRES
18	NHTSA ID Number: 10240263
19	Incident Date August 27, 2008 Consumer Location PARKER, AZ
20	Vehicle Identification Number 1FTSW21P85E****
21	Summary of Complaint CRASHYes
22	FIRENo INJURIES0
23	DEATHSO
24	TL*THE CONTACT OWNS A 2005 FORD F-250. WHILE DRIVING 55 MPH, THE FRONT END OF THE VEHICLE BEGAN TO SHAKE. THE CONTACT SLOWED THE VEHICLE DOWN AND
25	THE TIRES BLEW OUT. THE VEHICLE VEERED TO THE LEFT AND INTO ONCOMING
26	TRAFFIC. THE CONTACT CRASHED INTO A MOUNTAIN AND THE VEHICLE ROLLED OVER TWICE. THERE WERE NO INJURIES. A POLICE REPORT WAS FILED. THE CURRENT
27	AND FAILURE MILEAGES WERE 65,197.
28	1 Affected Product
20	
	-13-

Class Action Complaint Case No.

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1 2 3 4	August 21, 2008 NHTSA ID NUMBER: 10239123 Components: SUSPENSION NHTSA ID Number: 10239123 Incident Date February 11, 2005 Consumer Location PALMDALE, CA Vehicle Identification Number 1FTWW33P05E****
5	Summary of Complaint CRASHYes
6	FIRENo INJURIES0
7	DEATHS0
8 9	TO BRUCE YORK AND RICHARD BOYD I AM SO THANKFUL SOMEONE IS DOING SOMETHING ABOUT THIS PROBLEM. I KNOW FOR A FACT THIS SITUATION WITH THIS STEERING PROBLEM FAR EXCEEDS ANYTHING FORD IS WILLING TO ADMIT. MY CASE; I HAVE OWNED MY 2005 FORD F-350 KING RANCH 4X4, VIN #, SENSE FEBRUARY 11, 2005.
10	THIS TRUCK HAS EARNED ITS TWO NICKNAMES, RHUBARB EXPRESS AND #!*% PIECE
11	OF #@^%\$. THIS TRUCK HAS BEEN NOTHING BUT A NIGHTMARE FOR OUR FAMILY. MY WIFE AND I CAN'T BEGIN TO COUNT HOW MANY TIMES THIS TRUCK HAS GONE OUT OF
12	CONTROL AND LEFT US IN THE DITCH. WE HAVE LOST CONTROL OF THIS TRUCK NEARLY EVERY TIME EITHER ONE OF US HAS DRIVEN IT. TYPICAL SITUATION, WE ARE
13	DRIVING ALONG THE FREEWAY AT A SAFE SPEED. WE MIGHT FEEL A LITTLE BUMP ON
14	THE ROAD THEN THE STEERING WHEEL STARTS TO SHIMMY THEN BEGINS TO PULL FROM YOUR HANDS IN A HARD SHIMMY. FROM THE TIME YOU HIT THE BUMP TO THE
15	TIME THE TRUCK IS RIPPING YOUR HANDS FROM THE STEERING WHEEL IS LESS THE 2 SECONDS. THE OSCILLATIONS ARE MORE THE 90 DEGREES FROM SIDE TO SIDE ON THE
16	STEERING WHEEL. THESE OSCILLATIONS WILL CONTINUE FROM YOUR ORIGINAL
17	DRIVING SPEED UNTIL THE TRUCK IS BROUGHT TO A COMPLETE STOP. THIS USUALLY MEANS DRIVING OFF THE SIDE OF THE FREEWAY OR ROAD ONTO THE SHOULDER. ON
18	MANY OCCASIONS THERE IS NO SHOULDER AND WE HAVE STOPPED IN THE ROAD. ON OTHER OCCASIONS WE HAVE HAD TO STOP IN THE MIDDLE OF THE FREEWAY AS
19	THERE WERE SEMI TRUCKS IN THE SLOW LANE. I MEAN 65 TO 0 MILES AN HOUR IN THE
20	MIDDLE OF A LOS ANGELES FREEWAY! WE ALSO HAVE COUNTLESS MEMORIES OF SLIDING TO A STOP IN THE RHUBARB, DUST FLYING, OFF THE EDGE OF THE FREEWAY.
21	ALL WHILE CALLING FORD AND BEGGING THEM TO FIX IT! WE HAD THIS TRUCK IN THE DEALER MANY TIMES TO HAVE IT REPAIRED. *TR
22	1 Affected Product
23	
24	September 18, 2009 NHTSA ID NUMBER: 10284483
25	Components: STEERING
26	NHTSA ID Number: 10284483 Incident Date September 12, 2009
27	Consumer Location DURANT, OK
28	Vehicle Identification Number 1FTWW33P65E**** Summary of Complaint
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	Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.15 Page 15 of 353
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	CRASHYes FIRENo INJURIESO DEATHSO IHAVE A FORD F350 HEAVY DUTY 1 TON, I HAD EXPERIENCED ON SEPARATE OCCASIONS WHEN TRAVELING WITH SPEED AROUND 50-65 MPH, IF A BUMP (SLIGHT) DIP OR ANY SLIGHT VARIANCE IN ROAD MY TRUCK WILL BEGIN A VIOLENT SHAKE. I HAD RECEIVED THE RECALL NOTICE OF IMPROPER AIR PRESSURE AND CAUSE AND EFFECT. I HAVE HAD MY TIRE PRESSURE CHECKED ON NUMEROUS OCCASIONS, I HAVE ALSO HAD TAKEN MY TRUCK TO LOCAL DEALERSHIP TO CHECK FRONT SUSPENSION, NOTHING FOUND TO BE WRONG WITH FRONT END. (SUSPENSION). ON SEPT. 12, 09 I WAS TRAVELING ON HWY 199 COMING FROM MADILL, OK (JOB) COMING TOWARDS DURANT HAVING EMPLOYEE IN TRUCK (FRONT PASSENGER SEAT) MY TRUCK BEGAN TO VIOLENTLY SHAKE, THROWING MY TRUCK INTO A CONCRETE BRIDGE. I STEERED TRUCK THE BEST I COULD CONSIDERING THE TRUCK WAS UNCONTROLLABLE. THE REAR END OF THE TRUCK CLIMBED OVER THE BRIDGE THROWING THE TRUCK NEARLY ON ITS SIDE LANDING IN ONCOMING TRAFFIC FACING OPPOSITE DIRECTION OF TRAVEL 60FT. AWAY FROM BRIDGE. MY TRUCK APPEARS TO BE TOTALED. I OWE MORE THAN THE VALUE OF THE TRUCK AND NOW. MY EMPLOYEE AND MYSELF WERE TREATED TO LOCAL HOSPITAL I NOW HAVE A HERNIA FROM THE IMPACT OF THE TRUCK INTO THE BRIDGE. DUE TO SUSPENSION. I HAD TOLD OFFICER THAT THE TRUCK HAD DONE THIS BEFORE I HAVE RECEIVED A TICKET FOR NOT MAINTAINING SAFE VEHICLE. MY INSURANCE DOES NOT COVER MY PERSONAL INJURIES. I FEEL LIKE FORD HAS NOT OWN UP TO DEFECT OF THE TRUCK SUSPENSION. MAYBE DOT SHOULD INVESTIGATE FORD AGAIN. *TR <b>1 Affected Product</b>
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	September 23, 2008 NHTSA ID NUMBER: 10243184 Components: STEERING NHTSA ID Number: 10243184 Incident Date September 22, 2008 Consumer Location CINCINNATI, OH Vehicle Identification Number 1FTSX21536E**** Summary of Complaint CRASHYes FIRENo INJURIESO DEATHSO TL*THE CONTACT OWNS A 2006 FORD F-250. WHILE DRIVING 63 MPH, THE VEHICLE STRUCK A SMALL DIP IN THE ROAD. THE STEERING BEGAN TO SHAKE VIOLENTLY AND THE CONTACT LOST CONTROL. THE VEHICLE WILL NOT BE REPAIRED BECAUSE THE CONTACT WANTS THE VEHICLE REPLACED. THE MANUFACTURER STATED THAT THEY WERE AWARE OF THE FAILURE; HOWEVER, ADVISED HIM TO FOLLOW THE TSB INSTRUCTION TO REPAIR THE FAILURE. THE FAILURE MILEAGE WAS 51,000 AND CURRENT MILEAGE WAS 65,000. -15- Class Action Complaint Case No.

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.16 Page 16 of 353
1	1 Affected Product
2	March 31, 2008 NHTSA ID NUMBER: 10222944
4	Components: SUSPENSION NHTSA ID Number: 10222944
5	Incident Date January 15, 2008
	Consumer Location WINCHESTER, VA Vehicle Identification Number 1FTSX21P06E****
6	Summary of Complaint
7	CRASHYes
8	FIRENo INJURIES0
9	DEATHS0
10	AT APPROXIMATELY 40K ON THE VEHICLE, A PROBLEM BEGAN TO OCCUR WHEN A BUMP IN THE ROAD WAS HIT, RESULTING IN THE FRONT WHEELS SHIMMYING LEFT TO
11	RIGHT FOR ABOUT A SECOND. OVER THE NEXT FOUR MONTHS, THE PROBLEM
12	INTENSIFIED, LEADING TO A SEVERE SHAKE EMITTING FROM THE FRONT LEFT WHEEL. FORD RECOMMENDED AN ALIGNMENT AND THE STEERING DAMPENER (WHICH WAS
13	ALREADY INSTALLED). I REPLACED THE TIRES, DAMPENER, TRACK BAR AND BUSHING,
	WHICH SOLVED THE ISSUE FOR SEVERAL WEEKS, BUT SOON FOUND THAT I CORRECTED A SYMPTOM AND NOT THE TRUE PROBLEM. ABOUT THIS TIME I FOUND
14	OUT ABOUT YOUR INVESTIGATION AND DECIDED TO DEAL WITH THE PROBLEM, SINCE
15	NO ONE COULD DIAGNOSE THE ISSUE IN THE SHOPHOPING YOUR INVESTIGATION
16	WOULD PROVIDE A FIX. ON JANUARY 15TH, 2008 I EXPERIENCED AN ENCOUNTER WHERE THE SHAKE OCCURRED AND HIT BLACK ICE, RESULTING IN LOSS OF CONTROL,
17	SPINNING AND LANDING IN A DITCH, CAUSING BODY DAMAGE. THE ONLY WAY TO
18	STOP THE SHAKING IS TO ALMOST COMPLETELY STOP OR OVER CORRECT THE STEERING (IF THERE IS ROOM TO DO IT). SINCE THERE WAS NO OTHER VEHICLE
19	INVOLVED THE STATE TROOPER DIDN'T MAKE A REPORT OF THE INCIDENT. THE
20	PROBLEM STILL HAS NOT BEEN CORRECTED. *TR 1 Affected Product
21	January 6, 2014 NHTSA ID NUMBER: 10558662
22	Components: STEERING, SUSPENSION
23	NHTSA ID Number: 10558662
24	Incident Date August 20, 2012 Consumer Location PLACERVILLE, CA
25	Vehicle Identification Number 1FTWW33P36E****
26	Summary of Complaint CRASHYes
27	FIRENo
28	INJURIES0 DEATHS0
20	
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	Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.17 Page 17 of 353
1	I WAS IN OAKLAND CALIFORNIA I880 NORTH NUMBER FOUR LANE PULLING MY CAR TRAILER WITH A LOAD WHEN THE "DEATH WOBBLE" OCCURRED, BEFORE I COULD
2	GRAB THE TRAILER BRAKES TO SLOW THE VEHICLE, THE RIG STARTED A WHIP AND THE TRAILER STRUCK THE "K" RAIL. I SLOWED TO ABOUT 10MPH BEFORE THE SHIMMY
3	STOPPED. THE FENDER ON THE RIGHT SIDE OF THE TRAILER WAS DESTROYED AND
4	BLEW BOTH TIRES ON THE TANDEM AXLE TRAILER. LUCKILY NO ONE ELSE WAS INVOLVED AND NO ONE WAS HURT. THIS TRUCK NOW IS ON IT'S THIRD SET OF THE
5	FACTORY B.F. GOODRICH RUGGED TRAIL T/A RADIALS ON THE FRONT. I HAVE HAD
6	THIS VEHICLE ALIGNED WITH EACH TIRE CHANGE AND HAVE EXPERIMENTED WITH TIRE PRESSURES, IT DOES NOT MATTER, AFTER ABOUT TEN THOUSAND MILES ON A
7	SET OF TIRES IT SHIMMIES AGAIN. I HAVE RESORTED TO THE SAFETY AND
8	RELIABILITY OF MY 30 YEAR OLD CHEVY HALF TON AND OVERLOADING IT BY UP TO 50% OUT OF FEAR FOR THIS TRUCK. BECAUSE OF SHEAR NUMBERS INVOLVED,
9	NOTHING WILL EVER BE DONE BY THE NHTSA ABOUT THIS VEHICLE TYPE'S DEFECTS.
10	*TR 1 Affected Product
11	
12	July 1, 2014 NHTSA ID NUMBER: 10607347
13	Components: STEERING, SUSPENSION
	NHTSA ID Number: 10607347 Incident Date June 10, 2014
14	Consumer Location NEW BRAUNFELS, TX
15	Vehicle Identification Number 1FTSW21R38E**** Summary of Complaint
16	CRASHYes
17	FIRENo INJURIES0
18	DEATHSO
19	ON MY DAILY COMMUTE TO WORK I EXPERIENCED WHAT I HAVE LATER RESEARCHED
20	TO FIND OUT IS CALLED THE "DEATH WOBBLE". THE FIRST OCCURRENCE HAPPENED WHILE MAINTAINING A SPEED OF APPROXIMATELY 55 MPH WHICH WAS THE
-	SUGGESTED ROAD SPEED LIMIT, AFTER RIDING OVER A SMALL BUMP IN THE ROAD MY
21	FRONT LEFT END INITIATED INTO A VIOLENT SHAKING SENSATION THAT FELT AS THOUGH I HAD JUST BLOWN A TIRE. AFTER REDUCING MY SPEED ABRUPTLY AND
22	NEARLY BEING REAR ENDED THE FRONT END REGAINED ITS CONTROL AND I
23	CONTINUED AND ARRIVED SAFELY TO WORK AFTER REDUCING MY SPEED TO 45 MPH. I LOOKED IN THE WHEEL HUB AND UNDERNEATH BUT DID NOT SEE ANYTHING OUT OF
24	THE ORDINARY FROM PLANE SIGHT. I EXPERIENCED THE VIOLENT SHAKING ON
25	MULTIPLE OCCASIONS, DIFFERENT LOCATIONS AND FOUND MYSELF EXPERIENCING IT
26	MORE AND MORE AT LOWER SPEEDS AND ON SMALLER ROAD BUMPS/POT HOLES. AFTER DAY 2 I SCHEDULED AN APPOINTMENT FOR 6/30/14 WITH FORD SERVICE TO
27	HAVE THE REPAIR & DIAGNOSES. THE NEXT DAY 6/27/14 WE HAD TO EVACUATE OUR
28	JOB SITE IN LOUISIANA DUE TO EXTREME WEATHER CONDITIONS AND POSSIBLE TORNADOS, ON MY COMMUTE HOME, THE SO CALLED DEATH WOBBLE OCCURRED
28	AGAIN AND THIS TIME RESULTED IN LOOSING CONTROL AND CRASHING INTO A
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	Class Action Complaint

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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.18 Page 18 of 353	
1 2 3 4 5 6 7 8	SMALL TREE BECAUSE OF THE VIOLENT SHAKING AND NECESSARY BRAKING TO REGAIN CONTROL. I WAS ABLE TO ESCAPE WITH MINOR DAMAGES TO MY FRONT BUMPER. FORD IS HAVING TO REPLACE MY BALL JOINTS, BEARINGS AND TIE BAR THAT WILL COST WELL OVER \$600 IN REPAIRS EXCLUDING A NEW FRONT BUMPER THAT I CANNOT AFFORD TO FIX. I'M AFRAID THIS COULD RESULT IN A SERIOUS INJURY/FATALITY IF NOT RECALLED AND FIXED. HAD I GONE INTO INCOMING TRAFFIC IT COULD HAVE BEEN MY LIFE OR THEIRS AND I WOULD THINK FORD WOULD BE FULLY RESPONSIBLE. THERE ARE HUNDREDS OF SIMILAR CASES FROM OLDER MODELS AND EVEN NEWER UP TO 2013, MINE IS A F-250 2008. HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER- DUTY/TOHP1M75VBFBFT9IL/P5. *TR 1 Affected Product	
9 10 11	August 28, 2013 NHTSA ID NUMBER: 10537757 Components: SUSPENSION NHTSA ID Number: 10537757	
12	Incident Date March 2, 2010 Consumer Location LUFKIN, TX	
13	Vehicle Identification Number 1FT7W2B67BE****	
14	Summary of Complaint CRASHYes	
	FIRENO	
15	INJURIES1 DEATHS0	
16	2011 F -250 SD4X4 HAD 08 KING RANCH NEVER A PROB IN 87K MILES.THE 11 IS	
17	DANGEROUS!!!!!!!! THIS TRUCK WILL BE DOING FINE ON THE ROAD, HIT A BUMP OR ROUGH SPOT IN THE ROAD AND TRUCK GOES INTO (DEATH WOBBLE MODE ) THE	
18	WHOLE TRUCK STARTS BOUNCING AND SHAKING AND VILOENTLY WOBBLING. HAVE	
19	HAD IT BACK TO FORD STORE 4 TIMES. THEY REPLACED STEERING STABLIZER SHOCKS	
20	AND BALL JOINTS AT MY EXPENSE DUH!!! FIRST 3 TIMES THEY COULDNT FIND ANYTHING WRONG.IT KEPT DOIN IT . I TOOK IT BACK AND THEY DID THE REPAIRS I	
	STATED. WELL I THOUGHT IT WAS FIXED WRONG, 22 MILES AFTER REPAIR IT DID IT	
21	AGAIN IN A CURVE,, I COULDNT CONTROL THE WOBBLE AND ENDED UP GOIN THRU A FENCE INTO A FIELDHAVE TERRIBLE CUT ON LEGS AND FACEFILED LAWSUIT	
22	YESTERDAYWILL KEEP YOU POSTEDFORD HAS A MAJOR ENGINEERING PROB. THEY CONTINUE TO IGNORE,I INTEND TO GET THEIR ATTN,,JC *TT	
23	1 Affected Product	
24		
25	January 18, 2019 NHTSA ID NUMBER: 11170696	
26	Components: STEERING, WHEELS	
27	NHTSA ID Number: 11170696 Incident Date January 14, 2019	
28	Consumer Location BURLINGTON, WV	
	Vehicle Identification Number 1FT8W3DT4HE****	
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	Class Action Complaint Case No.	

¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.19 Page 19 of 353
1 2 3 4 5 6 7 8 9	Summary of Complaint CRASHYes FIRENo INJURIESO DEATHSO TRUCK SHAKING, WAS TOLD TIRE INFLATION WAS NOT BEING MAINTAINED. ALL VALVE STEMS LEAKING SINCE DAY I BOUGHT IT. ONE TIRE HAD FIX A FLAT IN IT WHEN I BOUGHT IT. IT TOOK FORD 6 MONTHS TO REPLACE VALVE STEMS CORRECTLY. AFTER THIS TRUCK STILL SHAKES ON ANY ROUGH ROAD, IF HIT ANY REAL RUFF TRUCK VIOLENT SHAKE HAVE TO STOP TO GET IT TO STOP. NOW SINCE TIRE PRESSURE CAN BE MAINTAINED SINCE VALOVE STEMS FIXED. THEY TELL ME FRONT TIRES NEED REPLACED FROM NOT MAINTAINING TIRE PRESSURES. THAT IS WHY TRUCK SHAKES. THE TRUCK HAS SHAKENOUGH SINCE THE FIRST MONTH I OWNED IT IT MARCH 2018, THIS HAS CAUSED FRONT TIRES TO WERE ON BOTH OUTSIDE EDGES. THE TRUCK
10	SHAKES SO BAD, I HAVE RAN OFF 7 TIMES, RAN TWO OTHER CARS OFF ROAD, AND PULLED OVER FOR SUSPECTED DUI TOLD OFFICER WHAT HAPPENED AND IF I DIDN'T
11	GET IT FIXED HE WRITE ME TICKET DEFECTIVE EQUIPMENT AND DEEM VEHICLE UNSAFE TO OPERATE. ALWAYS IN MOTION, ANY SPEED, ANY RUFF ROAD, EVEN GOING
12	ACROSS BRIGGS ANYTHING THAT IS NOT PERFECT SMOOTH ROAD
13	1 Affected Product
14	2. NHTSA Consumer Complaints of Death Wobble Causing Loss of Control of Vehicle
15	34. The following are the consumer complaints submitted to NHTSA where the Death
16	Wobble defect caused the driver to lose control of the vehicle:
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	February 11, 2009 NHTSA ID NUMBER: 10258400 Components: SUSPENSION NHTSA ID Number: 10258400 Incident Date February 10, 2009 Consumer Location Unknown Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WHILE TRAVELING AT ABOUT 60 MPH I LOST CONTROL OF MY TRUCK DUE TO VIOLENT SHAKING OF THE FRONT END. I HAD TO PULL OVER AND LET SPEED DECREASE TO 20 MPH TO REGAIN CONTROL. THIS HAPPENED TWICE IN A 2 MILE PERIOD. I THEN DROVE ON SHOULDER OF THE ROAD AT 20 MPH TO GET HOME. THIS HAS BEEN A CONSISTENT PROBLEM SINCE I BOUGHT THE TRUCK NEW IN 2005 BUT IT HAS NEVER BEEN THIS BAD. I ORIGINALLY THOUGHT IT WAS BECAUSE IT WAS A 4 WHEEL DRIVE. I AM NOW NOT WILLING TO DIVE AT HIGH SPEEDS. THIS IS A SUPER DANGEROUS PROBLEM!!! *TR 1 Affected Product
	-19- Class Action Complaint
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¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.20 Page 20 of 353
1	
2	April 4, 2009 NHTSA ID NUMBER: 10264111
3	Components: STEERING, SUSPENSION NHTSA ID Number: 10264111
4	Incident Date April 1, 2009
5	Consumer Location PUYALLUP, WA
	Vehicle Identification Number 1FTSW21P05E****
6	Summary of Complaint CRASHNo
7	FIRENO
8	INJURIES0
9	DEATHSO DRIVING AT SPEED 2005 FORD F 250 VIOLENT FRONT END DEATH WORRLE DEALER
-	DRIVING AT SPEED. 2005 FORD F-250 VIOLENT FRONT END DEATH WOBBLE, DEALER SAID IT NEEDED ALIGNMENT, THEN SAID IT WAS MY TIRES, WITH NEW TIRES IT STILL
10	DID IT. DEALER SAID THAT IT WAS OKAY. NOTHING WRONG. UNTIL YESTERDAY WHILE DRIVING TO INTER FREEWAY, AT 45MPH SLIGHT ROUGH ROAD SENT MY FORD TRUCK
11	INTO VIOLENT DEATH WOBBLE ALMOST CAUSED AN ACCIDENT, BY HITTING
12 13	CONCRETE BARRIER. LOST TOTAL CONTROL OF MY TRUCK. I'VE CONTACTED LEGAL COUNSEL TO SEE WHAT MY OPTIONS WILL BE, ALSO INFORMED TO MAKE CONTACT
	WITH DEALER SHIP TO SEE WHAT THEY INTEND TO DO. I HAVE EXTENDED WARRANTY ON MY TRUCK. DOES THIS FALL UNDER WARRANTY? OR LAW SUIT? *TR
14	1 Affected Product
15	
16	January 19, 2010 NHTSA ID NUMBER: 10300354
17	Components: SUSPENSION
18	<b>NHTSA ID Number:</b> 10300354
18	Incident Date January 19, 2010
19	Consumer Location PLANT CITY, FL Vehicle Identification Number N/A
20	Summary of Complaint
21	CRASHNo
22	FIRENo INJURIES1
	DEATHSO
23	2005 FORD F250 SUPER DUTY 4X4. VIOLENT SHAKING AFTER HITTING A SMALL DEFORMED PART OF THE ROAD, SLOW VEHICLE TO 10 MPH TO STOP THE SHAKING.
24	HAVE LOST CONTROL OF THE VEHICLE 2 TIMES IN THE LAST WEEK. I HAVE TAKEN IT TO THE SHOP AND NO ONE COULD FIND ANYTHING WRONG WITH THE VEHICLE. *TR
25	1 Affected Product
26	
27	June 27, 2008 NHTSA ID NUMBER: 10232498
28	Components: STEERING
	NHTSA ID Number: 10232498 -20-
	-20- Class Action Complaint Case No.

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.21 Page 21 of 353
1	Incident Date July 15, 2007
2	Consumer Location ATLANTIC BEACH, FL Vehicle Identification Number 1FTSW21575E****
3	Summary of Complaint
4	CRASHNo FIRENo
	INJURIES0
5	DEATHSO TI *THE CONTACT OWNE A 2005 FORD E 250 SUPERDUTY WHILE DRIVING
6	TL*THE CONTACT OWNS A 2005 FORD F-250 SUPERDUTY. WHILE DRIVING APPROXIMATELY 70 MPH OVER A BUMP, THE STEERING WHEEL BEGAN TO VIBRATE
7	AND SHAKE. THE CONTACT LOST PARTIAL CONTROL OF THE STEERING AND THE
8	VEHICLE SWAYED TO THE SHOULDER OF THE HIGHWAY. THERE WERE NO WARNINGS PRIOR TO THE FAILURE. THE VEHICLE WAS NOT TAKEN TO A MECHANIC FOR THIS
9	FAILURE AND WAS ABLE TO BE DRIVEN. THE FAILURE OCCURRED TWO ADDITIONAL
10	TIMES. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THEY PERFORMED A SAFETY INSPECTION. THE TECHNICIAN STATED THAT THERE WERE NO
11	MALFUNCTIONS WITH THE VEHICLE. THE FAILURE MILEAGE WAS 42,000 AND CURRENT
12	MILEAGE WAS 51,000. UPDATED 07/29/08 *BF UPDATED 07/29/08 1 Affected Product
12	1 Associated Document
14	June 13, 2009 NHTSA ID NUMBER: 10273718
15	Components: SUSPENSION, STEERING NHTSA ID Number: 10273718
16	Incident Date June 13, 2009
17	Consumer Location WEST PITTSTON, PA Vehicle Identification Number 1FTNF21535E****
18	Summary of Complaint
19	CRASHNo
20	FIRENo INJURIES0
21	DEATHS0
	I EXPERIENCED A SEVERE AND VIOLENT SHAKING OF THE FRONT END OF MY 2005 FORD F-250 TRUCK WHILE TRAVELING 60 MPH OVER A SLIGHT ROUGH PATCH ON A
22	HIGHWAY. I LOST CONTROL OF MY VEHICLE AND WAS FORCED TO SWERVE OFF THE
23	HIGHWAY. I WAS ALMOST HIT BY THE VEHICLE DIRECTLY BEHIND ME. THIS IS THE THIRD TIME I HAVE LOST CONTROL OF THE TRUCK BECAUSE OF THIS VIOLENT
24	SHAKING IN THE LAST MONTH. I HAVE HAD THE TRUCK TO A LOCAL INSPECTION
25	STATION AND THEY REPLACED THE STEERING STABILIZER AND DID AN ALIGNMENT. THIS DID NOT HELP. I HAVE CALLED THE FORD DEALER I PURCHASED THE TRUCK
26	FROM AND THEY SAID THEY NEVER HEARD OF ANYONE HAVING THIS PROBLEM WITH
27	ANY FORD TRUCK. OBVIOUSLY, THEY ARE AWARE OF THE PROBLEM. I ONLY HOPE THERE IS A RECALL BEFORE TOO MANY PEOPLE DIE. *TR
28	1 Affected Product
	-21- Class Action Complaint
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	353 August 21, 2008 NHTSA ID NUMBER: 10239123 Components: SUSPENSION NHTSA ID Number: 10239123 Incident Date February 11, 2005 Consumer Location PALMDALE, CA Vehicle Identification Number: 1FTW 33P05E**** Summary of Complaint CRASHYes FIRENO INJURIESO DEATHSO TO BRUCE YORK AND RICHARD BOYD I AM SO THANKFUL SOMEONE IS DOING SOMETHING ABOUT THIS PROBLEM. I KNOW FOR A FACT THIS SITUATION WITH THIS STEERING PROBLEM FAR EXCEEDS ANYTHING FORD IS WILLING TO ADMIT. MY CASE; I HAVE OWNED MY 2005 FORD F-350 KING RANCH 4X4, VIN #, SENSE FEBRUARY 11, 2005. THIS TRUCK HAS EARNED ITS TWO NICKNAMES, RHUBARB EXPRESS AND #I*% PIECE OF #@ ^%s, THIS TRUCK HAS BEEN NOTHING BUT A NIGHTMARE FOR OUR FAMILY. MY WIFE AND I CAN'T BEGIN TO COUNT HOW MANY TIMES THIS TRUCK HAS GONE OUT OF CONTROL AND LEFT US IN THE DITCH. WE HAVE LOST CONTROL OF THIS TRUCK HAS GONE OUT OF OF US AS DRIVEN IT. TYPICAL SITUATION, WE ARE DRIVING ALONG THE FREEWAY AT A SAFE SPEED. WE MIGHT FEEL A LITTLE BUMP ON THE ROAD THEN THE STEERING WHEEL STARTS TO SHIMMY THEN BEGINS TO PULL FROM YOUR HANDS IN A HARD SHIMMY, FROM THE TIME YOU HIT THE BUMP TO THE TIME THE TRUCK IS RIPPING YOUR HANDS FROM THE STEERING WHEEL IS LESS THE 2 SECONDS. THE OSCILLATIONS ARE MORE THE 90 DEGREES FROM SIDE TO SIDE ON THE STEERING WHEEL I THESE OSCILLATIONS WILL CONTINUE FROM YOUR ORIGINAL DRIVING SPEED UNTIL THE TRUCK IS BROUGHT TO A COMPLETE STOP. THIS USUALLY MEANS DRIVING OFF THE SIDE OF THE FREEWAY OR ROAD ONTO THE SHOULDER, ON MANY OCCASIONS THERE IS NO SHOULDER AND WE HAVE STOPPED IN THE ROAD. ON OTHER OCCASIONS WE HAVE HAD TO STOP IN THE MIDDLE OF THE FREEWAY AS THERE WERE SEMI TRUCKS IN THE SLOW LANE. I MEAN 65 TO 0 MILES AN HOUR IN THE MIDDLE OF A LOS ANGELES FREEWAY! WE ALSO HAVE COUNTLESS MEMORIES OF SLIDING TO A STOP IN THE RHUBARB, DUST FLYING, OFF THE EDGE OF THE FREEWAY. ALL WHILE CALLING FORD AND BEGGING THEM TO FILM THE WEAD THIS TRUCK IN THE DEALER MANY TIMES TO HAVE IT REPAIRED. *TR <b>I Affected Product</b>
25 26 27 28	June 22, 2009 NHTSA ID NUMBER: 10274673 Components: SUSPENSION NHTSA ID Number: 10274673 Incident Date June 20, 2009 Consumer Location FAYETTEVILLE, GA Vehicle Identification Number 1FTWW33P75E****
20	Summary of Complaint -22- Class Action Complaint Case No.

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1	CRASHNo
2	FIRENo
	INJURIES0 DEATHS0
3	I OWN A 2005 FORD F-350 4X4 6.0 DIESEL. IT HAS 63,000 MILES ON IT. ON MANY
4	OCCASIONS THE STEERING WHEEL HAS SHIMMIED OR OSCILLATED VIOLENTLY TO THE
5	POINT I ALMOST LOST CONTROL OF THE TRUCK. THIS IS VERY DANGEROUS. WHEN THE FRONT WHEELS HIT A BUMP OR POTHOLE, WITH A VERY SMALL AMOUNT OF TURNING
6	THE VEHICLE TO THE LEFT OR RIGHT SUCH AS GOING AROUND A CURVE, THE FRONT
7	WHEELS HAVE STARTED TO VIOLENTLY SHIMMY OR OSCILLATE CAUSING THE STEERING WHEEL TO VIOLENTLY SHIMMY BACK AND FORTH. THIS USUALLY OCCURS
8	AT SPEEDS ABOVE 40 MPH. FOUR TIMES I HAVE ALMOST LOST CONTROL OF THE
	TRUCK. ONCE THE TRUCK TURNED LEFT INTO AN ONCOMING LANE BUT FORTUNATELY THERE WHERE NO ONCOMING VEHICLES AT THAT MOMENT. I HAD TO
9	SLOW DOWN TO ABOUT 25-30 MPH AND MOVE TO THE SHOULDER OF THE ROAD TO
10	GAIN CONTROL OF THE VEHICLE. THIS IS A SERIOUS PROBLEM WITH THIS VEHICLE
11	ESPECIALLY IN HEAVY TRAFFIC OR ON TWO LANE MOUNTAIN ROADS. I ORIGINALLY COMPLAINED ABOUT THIS AFTER I PURCHASED THE VEHICLE IN FEBRUARY 2005, AND
12	WAS TOLD THE TRUCK WAS WITHIN SPECS AND THERE WAS NOTHING TO BE DONE. I
13	REQUEST THE NHTSA LOOK INTO THIS. I HAVE DISCUSSED THIS WITH OTHER OWNERS AND THEY TOO HAVE HAD SIMILAR LOSS OF CONTROL PROBLEMS FROM STEERING
14	WHEEL SHIMMY OR OSCILLATION. I BELIEVE THERE ARE OTHER TRUCKS THAT HAVE
15	THE SAME PROBLEM. *TR 1 Affected Product
16	
17	February 8, 2016 NHTSA ID NUMBER: 10824888 Components: STEERING, SUSPENSION, UNKNOWN OR OTHER
18	NHTSA ID Number: 10824888
19	Incident Date November 25, 2015 Consumer Location SANDY, OR
20	Vehicle Identification Number 1FTWW31P85E****
21	Summary of Complaint
21	CRASHNo FIRENo
	INJURIES0
23	<b>DEATHS0</b> I WAS DRIVING ON A TWO LANE BACK ROAD AROUND 45 TO 50 MPH, AND MY TRUCK
24	STARTED VIOLENTLY SHAKING AND I LOST ALL CONTROL OF STEERING. I WENT INTO
25	THE ONCOMING LANE, LUCKILY NO ONE WAS COMING, AND HAD TO HIT MY BRAKES HARD TO GET THE SHAKING TO STOP. IT HAS ALSO HAPPENED WHILE DRIVING AT
26	SPEEDS OF 35-40 ON A CITY STREET AND 60 MPH ON A HIGHWAY. THIS IS KNOWN AS
27	DEATH WOBBLE. THE WOBBLE WAS SO BAD THAT IT LOOSENED THE TRACK BAR AND
28	THE BOLT HOLDING THE POWER STEERING HARD LINE. I LOST ALL POWER STEERING FLUID WITHIN SECONDS. I HAVE RESEARCHED IT, TRIED REPLACING SEVERAL PARTS,
20	LIKE TIE-RODS, AND IT HAS LESSENED A LITTLE BIT, BUT IF I HIT A BUMPY ROAD OR
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1 2 3	EVEN JUST A PATCH OF NEW PAVEMENT, IT STARTS SHAKING. I HAVE READ A LOT OF OTHER FORD OWNERS ARE EXPERIENCING THIS SAME ISSUE WITH THEIR TRUCKS. 1 Affected Product
4	January 5, 2007 NHTSA ID NUMBER: 10177891
5	Components: STEERING
6	NHTSA ID Number: 10177891 Incident Date January 4, 2007
-	Consumer Location GLEN BURNIE, MD
7	Vehicle Identification Number 1FTWW33P15E**** Summary of Complaint
8	CRASHNo
9	FIRENo INJURIESO
10	DEATHS0
11	TL* - WHEN CONTACTWAS DRIVING AND GOING OVER A SERIES OF SMALL BUMPS LOST CONTROL OF THE STEERING WHEEL WHICH WENT FROM RIGHT TO LEFT
12	QUICKLY TO THE POINT OF BEING ALMOST UNCONTROLLABLE. IN ORDER FOR
13	CONTACT TO GET CONTROL OF THE STEERING WHEEL SHE HAD TO SLOW THE VEHICLE DOWN TO A SPEED OF 5 MPH OR COME TO A COMPLETE STOP. THE CONTACT TOOK THE
14	VEHICLE TO THE DEALERSHIP ,AND THEY STATED THAT THEY NOTICED THE SAME
15	INCIDENT AS WELL ON A TEST DRIVE OF THE VEHICLE, BUT THEY COULD NOT DO ANYTHING ABOUT THE INCIDENT BECAUSE THE MANUFACTURER HASN'T GIVING THE
16	DEALERSHIP ANY ADVISE ON HOW TO FIX THE FAILURE.*AK 1 Affected Product
17	
18	January 23, 2008 NHTSA ID NUMBER: 10215739
19	Components: STEERING, ELECTRICAL SYSTEM
20	NHTSA ID Number: 10215739 Incident Date January 17, 2008
	Consumer Location Unknown
21	Vehicle Identification Number 1FTWX31525E**** Summary of Complaint
22	CRASHNo
23	FIRENo INJURIESO
24	DEATHS0
25	TL*THE CONTACT OWNS A 2005 FORD F-350 SD. WHILE DRIVING 65 MPH, THE CONTACT LOST CONTROL OF THE STEERING AND THE VEHICLE SWERVED ALL OVER THE ROAD.
26	WHEN DRIVING OVER ROUGH PAVEMENT, A BRIDGE EXPANSION, OR A SLIGHT BUMP,
27	THE STEERING WORSENS. HE HAS TAKEN THE VEHICLE TO THE DEALER FOUR TIMES AND WAS INFORMED THAT THE TIRES NEEDED TO BE ROTATED, THE BUSHING NEEDED
28	TO BE CHANGED, AND THE TIRE PRESSURE WAS INCORRECT. THE PURCHASE DATE
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1 2 3	WAS UNKNOWN. THE CURRENT MILEAGE WAS 36,674 AND FAILURE MILEAGE WAS 10,000. THE ENGINE LIGHT ILLUMINATED. UPDATED 02-12-08 *BF 1 Affected Product 1 Associated Document
4	
5	September 5, 2008 NHTSA ID NUMBER: 10241025 Components: STEERING
6	NHTSA ID Number: 10241025
7	Incident Date April 19, 2008 Consumer Location ALGONQUIN, IL
8	Vehicle Identification Number 1FTWW31PX5E****
9	Summary of Complaint CRASHNo
	FIRENo
10	INJURIES0
11	DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F-350 SUPERDUTY. THE CONTACT STATED THAT
12	THE STEERING WHEEL SHOOK SO VIOLENTLY THAT HE LOST CONTROL. WHILE
13	DRIVING 65 MPH, HE WAS INCAPABLE OF CONTROLLING THE STEERING. IT WOULD MOVE FROM LEFT TO RIGHT AND HE UNSUCCESSFULLY COMPENSATED FOR THE
14	FAILURE. THE VEHICLE WAS TAKEN TO THE DEALER TWICE, BUT THEY COULD NOT
	DUPLICATE THE FAILURE. THE DEALER STATED THAT NOTHING WAS WRONG WITH
15	THE VEHICLE. THE MANUFACTURER HAS NOT BEEN NOTIFIED. THE CURRENT MILEAGE WAS APPROXIMATELY 95,000 AND FAILURE MILEAGE WAS APPROXIMATELY 93,000.
16	1 Affected Product
17	
18	July 28, 2011 NHTSA ID NUMBER: 10415452
19	Components: STEERING
20	NHTSA ID Number: 10415452 Incident Date July 2, 2011
	Consumer Location LOS GATOS, CA
21	Vehicle Identification Number 1FTWW31P25E****
22	Summary of Complaint CRASHNo
23	FIRENO
24	INJURIES0 DEATHS0
25	ON JULY 2, 2011, I WAS DRIVING MY 2005 F350 4X4 FORD TRUCK AT APPROXIMATELY 60
26	MPH ON A DOWNHILL GRADE AND HIT A POTHOLE IN THE ROAD. THE TRUCK STARTED
	SHAKING SO VIOLENTLY THAT I LOST CONTROL AND DRIFTED INTO THE ONCOMING TRAFFIC LANE FOR SEVERAL SECONDS WITHOUT BEING ABLE TO CONTROL THE
27	VEHICLE. FORTUNATELY IT WAS LATE AT NIGHT AND NO OTHER VEHICLES WERE
28	APPROACHING. THE STEERING WHEEL SHOOK SO VIOLENTLY THAT IT BLURRED MY VISION WHILE TRYING TO HOLD ON AND REGAIN CONTROL. THE SHAKING LASTED 10-
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.26 Page 26 of 353
1 2 3 4 5 6 7 8	15 SECONDS AND ONLY STOPPED AFTER I WAS ABLE TO SLOW THE VEHICLE BELOW 40 MPH. I HAD MY WIFE AND TWO SONS IN THE VEHICLE WITH ME. THIS INCIDENT MAY HAVE CAUSED A CRASH IF THERE WAS ONCOMING TRAFFIC OR IF IT HAD OCCURRED ON A BEND IN THE ROAD. THIS INCIDENT WAS THE MOST VIOLENT EXPERIENCED TO DATE, BUT I HAVE EXPERIENCED THIS VIOLENT SHAKING ON 3 OTHER OCCASIONS AFTER HITTING A BUMP IN THE ROAD. I HAD MY TRUCK CAMPER ON THE VEHICLE AND IT SHOOK THE CAMPER SO VIOLENTLY IN THE BED THAT THE TAILGATE DOES NOT FIT PROPERLY ANYMORE DUE TO WHAT APPEARS TO BE A FLARING OF THE TRUCK BED. I FIRMLY BELIEVE MY ENTIRE FAMILY WAS IN MORTAL DANGER WITH THIS EVENT AND I AM HESITANT TO DRIVE THE VEHICLE. FORD NEEDS TO RECALL AND FIX THIS VERY DANGEROUS DEFECT IN THEIR TRUCKS. *TR <b>1 Affected Product</b>
9 10 11	November 15, 2008 NHTSA ID NUMBER: 10248890 Components: SUSPENSION, EQUIPMENT NHTSA ID Number: 10248890 Incident Date July 4, 2005
12 13 14	Consumer Location EL CAJON, CA Vehicle Identification Number 1FTWW33P45E**** Summary of Complaint CRASHNo
15 16	FIRENO INJURIESO DEATHSO ON JULY 4, 2005, I PURCHASED A 2005 FORD F350 SUPER DUTY LARIAT WITH LONG BED
17 18	AND DUAL WHEELS AND 4WD AT EL CAJON FORD. FROM THE BEGINNING, THE TRUCK EXPERIENCED SEVERE FRONT-END VIBRATION WHEN I REACHED ABOUT 60 MPH. IT
18 19	CONTINUED UNTIL I GOT TO ABOUT 80 MPH. I COMPLAINED ABOUT THIS PROBLEM FROM THE FIRST VISIT FOR SERVICE AT DOWNEY FORD. AFTER A FEW VISITS FOR DIAGNOSTICS, DOWNEY FORD INSTALLED A "DAMPENER" ON THE FRONT END. IT
20	MADE THE PROBLEM BETTER, BUT IT DID NOT COMPLETELY CURE THE DEFECT. I EVENTUALLY BOUGHT A LANCE CAMPER, WHICH WAS ON THE TRUCK FOR OVER A
21 22	YEAR. WHILE THE TRUCK HAD THE 3000 LB CAMPER ON IT, THE VIBRATION WENT AWAY ON THE STRAIGHTAWAY, BUT WAS HORRIBLY DANGEROUS ON THE CURVES.
22	FOR EXAMPLE, ONE SUCH CURVE IS THE 605 SB TO THE 405 SB IN LONG BEACH. I ALMOST LOST CONTROL OF THE VEHICLE/CAMPER ON THIS CURVE UNLESS I ALMOST
24	STOPPED. I REMOVED THE CAMPER ABOUT A YEAR AGO AND THE PROBLEM WITH THE TRUCK IS WORSE. IT NOW WILL VIBRATE UNCONTROLLABLY AT 40-50 MPH. I
25	REPORTED THIS VIBRATION PROBLEM EVERY TIME I WENT TO THE DEALER FOR SERVICE. THEY ALWAYS SAID THEY DID ALL THEY COULD WITH THE DAMPENER. I
26	TOOK THE TRUCK TO EL CAJON FORD ABOUT 3-4 WEEKS AGO. NOW THAT IT IS OUT OF WARRANTY, FORD NOW SAYS IT CAN FIX THE PROBLEM, BUT IT HAS DAMAGE THE
27 28	FRONT STEERING MECHANISM. THE SERVICE WRITER SAID IN A VOICE MAIL THAT DOWNEY PUT ON A DAMPER THAT WAS TOO SMALL FOR MY TRUCK.
20	

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1 2 3 4 5 6	I DEMANDED THEY FIX IT FREE AND THEY REFUSE. I WANT MY TRUCK FIXED. THIS IS A DESIGN DEFECT, SINCE IT HAS EXISTED FROM DAY 1. I HAVE READ ON SEVERAL WEBSITES THAT THIS IS A COMMON PROBLEM THAT EXISTED WELL BEFORE 2005, BUT FORD HAS IGNORED THE SAFETY ISSUES. A HIGH PROBABILITY OF AN ACCIDENT EXISTS WHEN YOUR TRUCK IS VIBRATING AND BOUNCING ACROSS LANES AND YOU CANNOT STEP ON THE BRAKE OR MAKE IT WORSE! THANK YOU, ANNETTE GILLIAM *TR 2 Affected Products
7 8 9 10	September 4, 2016 NHTSA ID NUMBER: 10903511 Components: STEERING, WHEELS, SUSPENSION NHTSA ID Number: 10903511 Incident Date July 14, 2015 Consumer Location CHESTER, NH Vehicle Identification Number 1FTWW31595E**** Summary of Complaint
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> </ol>	CRASHNO FIRENO INJURIESO DEATHSO DEATH WOBBLE. 1ST TIME IT HAPPENED WAS ENTERING THE HIGHWAY OFF THE RAMP AND ACCELERATING TO MERGE INTO TRAFFIC AND GOING OVER THE OVERPASS THE BRIDGES IN MASS. ARE A MESS, ANY WAY, WHEN I DROVE THOSE SERIES OF BUMPS AT
16 17 18	ABOUT 60-65 MPH IN A TRUCK IT GETS BUMPY ANYWAY BUT ALL OF A SUDDEN THE STEERING WHEEL, AND THE TRUCK STARTED VIOLENTLY SHAKING OUT OF CONTROL SO BAD I LOST COMPLETE VISION IT WAS SHAKING SO BAD WITH NO CAPABILITY OF STEERING THE TRUCKINSTINCTIVELY I APPLIED THE BRAKES NOT EVEN CHECKING TO SEE WHAT WAS BEHIND ME AS IT WAS SHAKING SO BAD, YOU CANT TURN AROUND, YOU CAN NOT SEE OUT THE MIRRORS. AS I STATED YOU KIND OF LOSE
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	VISION AND EVERYTHING GOES BLURRY BECAUSE YOUR SHAKING IN THE VEHICLE SO BAD. A QUICK GOOGLE AND YOU FIND THIS HAPPENS TO MANY MANY OWNERS OF THIS VERY THE SAME TRUCK. IN FACT FORD SENT ME A LETTER STATING THEY KNEW ABOUT IT AND TO MAKE SURE WE HAVE THE CORRECT AIR PRESSURE. I USE A \$50 AIR PRESSURE GAUGE, THE AIR PRESSURES NOT THE PROBLEM. IT WAS STILL HAPPENING ANYTIME YOU GO OVER BIG BUMPS OR A SERIES OF SMALLER BUMPS WILL SET IT OFF WHILE DRIVING ON THE HIGHWAY OR OVER 60 MPH. IT DOESN'T HAPPEN TO US AT
24 25 26	SLOWER SPEEDS. THIS IS AN EXTREMELY DANGEROUS DEFECT.  1 Affected Product  July 24, 2008 NHTSA ID NUMBER: 10235638 Commonents: SUSPENSION STEEDING
27 28	Components: SUSPENSION, STEERING NHTSA ID Number: 10235638 Incident Date June 18, 2008 Consumer Location BLOWING ROCK, NC -27-
	Class Action Complaint Case No.

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1	Vehicle Identification Number 1FTSX21586E****
2	Summary of Complaint
	CRASHNo FIRENo
3	INJURIES0
4	<b>DEATHS0</b> I OWN A 2006 F-250 FORD TRUCK. WHILE DRIVING ON THE INTERSTATE THE FRONT END
5	OF THE TRUCK STARTED VIOLENTLY SHAKING. I ALMOST LOST CONTROL AND COULD HAVE BEEN KILLED. THIS HAPPENED YET AGAIN THE VERY SAME DAY. I TOOK MY
6	FORD TRUCK TO THE FORD DEALERSHIP IN BOONE AND WAS TOLD THERE WAS
7	NOTHING WRONG WITH MY TRUCK. THEY CLAIMED IT WAS PROBABLY DUE TO LOW AIR PRESSURE IN THE TIRES. AFTER RESEARCHING THIS PROBLEM ON MY OWN I
8	DISCOVERED THAT THIS IS QUITE A COMMON PROBLEM AND MANY MANY FORD
9	TRUCK OWNERS ARE CURIOUS AS TO WHY NOTHING HAS BEEN DONE. AFTER CLEARLY TELLING THE FORD DEALERSHIP THAT I WILL NOT ACCEPT MY TRUCK BACK UNTIL IT
10	HAS BEEN FIXED, THEY REVEAL THAT THEY DO HAVE A SERVICE BULLETIN ABOUT
11	THIS PROBLEM AND REVEAL TO ME THAT FORD TOLD THEM TO CHANGE THE AIR PRESSURE IN THESE TRUCKS. THIS DOES NOT CORRECT THIS DANGEROUS AND
12	POTENTIALLY LIFE THREATENING PROBLEM! THESE TRUCKS NEED TO BE RECALLED AND HAVE THEIR STEERING DAMPNERS REPLACED! AFTER FIVE DAYS OF ARGUING
13	WITH THE FORD DEALERSHIP I HAVE YET TO GET MY TRUCK BACK. I DEMANDED A
14	LETTER STATING THAT MY FORD TRUCK WOULD BE SAFE AND THAT THEY WOULD BE LIABLE IN THE EVENT OF MY DEATH DUE TO THIS PROBLEM THAT NO ONE WILL TAKE
15	CARE OF! I HAVE YET TO RECEIVE THEIR ANSWER. *TR
16	1 Affected Product
17	
18	August 22, 2008 NHTSA ID NUMBER: 10239261 Components: SUSPENSION, STEERING
19	NHTSA ID Number: 10239261
20	Incident Date May 15, 2008 Consumer Location CARY, NC
21	Vehicle Identification Number 1FTSW21P66E****
21	Summary of Complaint CRASHNo
	FIRENo INJURIES0
23	DEATHS0
24	VIOLENT SHAKING IN FRONT SUSPENSION AND WHEELS AFTER HITTING ROUGH
25	PAVEMENT AT APPROX 65 MPH. TRUCK ALWAYS HAS EXCESSIVE WHEEL HOP BUT EXTREME SHAKING HAS OCCURRED 5 TIMES IN 66K MILES. FORD TECHNICAL
26	BULLETIN USELESS FOR RESOLVING PROBLEM. DEALER SUGGESTED CHECK TIRE INFLATION, TOW SETTINGS, AND STEERING COMPONENTS. NO RESULTS. THIS IS A
27	DEATH TRAP. IT SHOOK TWO DRINKS OUT OF THE CUPHOLDER. LOST STEERING
28	ABILITY, CROSSED LANES AND STOPPED SHAKING ONLY AFTER COMING TO A COMPLETE STOP. *TR
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1	1 Affected Product
2	September 3, 2010 NHTSA ID NUMBER: 10353642
4	Components: SUSPENSION, STEERING NHTSA ID Number: 10353642
5	Incident Date September 2, 2010
	Consumer Location ROCHESTER, NY
6	Vehicle Identification Number N/A Summary of Complaint
7	CRASHNo
8	FIRENo INJURIES0
9	DEATHSO
10	FORD 2006 F250 DEATH WOBBLE. I WAS DRIVING MY TRUCK TODAY AND I HIT A LITTLE POT HOLE IN THE ROAD AND NEARLY LOST CONTROL OF MY TRUCK. THE TRUCK WAS
11	SHAKING SO BAD I THOUGHT FOR SURE THE FRONT WHEELS WERE OFF AND WE WERE
12	DEAD. SCARIEST THING EVER. FORD NEEDS TO RECALL THIS ISSUE BEFORE IT KILLS SOMEONE IF IT HASN'T ALREADY. THIS IS VERY SERIOUS WE PAY GOOD MONEY FOR
	THESE VEHICLES AND SHOULD NOT HAVE TO PAY OUT OF POCKET FOR THE FIX.
13	THANK YOU VERY MUCH FOR TAKING THE TIME TO READ THIS HOPE FORD DOSE THE
14	RIGHT THING AND RECALLS THIS ISSUE. *TR 1 Affected Product
15	
16	
17	September 18, 2013 NHTSA ID NUMBER: 10544242 Components: STEERING, SUSPENSION, WHEELS
	NHTSA ID Number: 10544242
18	Incident Date September 3, 2013
19	Consumer Location Unknown Vehicle Identification Number 1FTSW21556E****
20	Summary of Complaint
21	CRASHYes
22	FIRENo INJURIES4
	DEATHS0
23	I HAD NEVER HEARD OF A DEATH WOBBLE UNTIL I WAS ON MY WAY TO THE HOSPITAL WITH MY THREE CHILDREN AFTER BEING INVOLVED IN A ROLLOVER ACCIDENT. WE
24	WERE TRAVELING NORTH BOUND ON THE M53 VAN DYKE EXPRESSWAY WHICH HAS A
25	POSTED SPEED OF 70 MPH. I HAD JUST PASSED A VEHICLE THAT WAS IN THE RIGHT
26	LANE. JUST AFTER PASSING THIS VEHICLE I DEVELOPED THIS DEATH WOBBLE, I WAS SWITCHING LANES BACK TO THE RIGHT LANE WHEN MY STEERING WHEEL STARTED
27	TO SHAKE, NOT JUST A LITTLE SHACKING EITHER. I HAD APPLIED MY BRAKES AND
	HELD THE WHEEL WITH BOTH MY HANDS. MY STEERING WHEEL WAS SHACKING SO
28	BADLY THAT MY DASHBOARD WAS FALLING APART, AND I WAS HAVING MAJOR PROBLEMS CONTROLLING MY VEHICLE. IT FELT AS IF MY DRIVER?S WHEEL WAS
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1 2 3 4 5 6 7 8 9	BOUNCING UP AND DOWN AND MY STEERING WHEEL WAS ALSO SHAKING SO BADLY THAT IN JUST A SECOND I HAD LOST TOTAL CONTROL OF MY VEHICLE. MY TRUCK DRIFTED TO THE RIGHT AND MY LEFT FRONT WHEEL HIT THE TURF FOLLOWED BY MY LEFT REAR WHEEL HITTING THE TURF AND WE STARTED TO ROLL. WE ROLLED TWO IN HALF TIMES BEFORE COMING TO A STOP UPSIDE DOWN. THE CAB OF THE TRUCK WAS CRUSHED, THE RIGHT REAR CORNER OF THE CAB WAS PUSHED DOWN FURTHER THAN THE HEADRESTS ON THE SEAT WERE MY YOUNGEST WAS SITTING, AND THANK GOD MY 7 YEAR OLD WASN?T KILLED. ON THE PASSENGER?S SIDE THE ROOF WAS SMASHED AGAINST THE HEAD REST WERE MY DAUGHTER WAS SEATED. I AM VERY THANKFUL THAT MY 3 CHILDREN AND I LIVED THROUGH THIS NIGHT MARE. I HAVE DRIVEN A PICKUP TRUCK FOR OVER 20 YRS., AND I HAVE NEVER FELT THIS DEATH WOBBLE BEFORE. <b>1 Affected Product</b>
10	February 20, 2014 NHTSA ID NUMBER: 10565061
11	Components: WHEELS, SUSPENSION, STEERING NHTSA ID Number: 10565061
12	Incident Date February 19, 2014
13	Consumer Location JOHNS CREEK, GA Vehicle Identification Number N/A
14	Summary of Complaint
15	CRASHNo FIRENo
	INJURIES0
16	DEATHSO
17	WHILE DRIVING MY 2006 FORD F250 FX4, AT SPEEDS BETWEEN 45-65 MPH, A SLIGHT VIBRATION IS FELT. WITHIN A FEW SECONDS IT TURN INTO A VIOLENT SHAKING
18	MOTION AS IF I'M DRIVING ON LARGE COBBLE STONES. IT HAS BEEN SO BAD I HAVE
19	ALMOST LOST CONTROL ON THE HIGHWAY AND CAME WITHIN INCHES OF HITTING ANOTHER VEHICLE. WHEN IT STARTS THERE IS NO STOPPING IT, AS THE STEERING
20	WHEEL JERKS VIOLENTLY. FORD HAS SENT A LETTER OUT THAT SAY INFLATE YOUR TIRES AND IF IT STILL HAPPENS SLOW DOWN UNTIL IT STOPS. THAT'S NOT RIGHT. THIS
21	IS DANGEROUS. I HAVE TO SLOW DOWN TO 30 MPH FOR IT TO STOP. I CAN'T DO THAT
22	ON THE HIGHWAY. THE DEALERS AND FORD SAY THERE IS NOTHING THEY WILL DO. THIS ISSUE IS EXTREMELY DANGEROUS DUE TO FORDS ENGINEERING MISHAP.MY
23	TIRES ARE STOCK, ROTATED, BALANCED, AND ALIGNED, THIS HAPPENS AT LEAST
24	ONCE EVERY OTHER WEEK 2005-2013 F250,350 OWNERS REPORT THE SAME ISSUE. GOOGLE: FORD DEATH WOBBLE, AND WATCH THE F250 AT CRUISING SPEED. *TR
25	1 Affected Product
26	
	September 23, 2008 NHTSA ID NUMBER: 10243184
27	Components: STEERING
28	NHTSA ID Number: 10243184 Incident Date September 22, 2008
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1 2 3	Consumer Location CINCINNATI, OH Vehicle Identification Number 1FTSX21536E**** Summary of Complaint CRASHYes
1	FIRENO
1	INJURIES0 DEATHS0
5	TL*THE CONTACT OWNS A 2006 FORD F-250. WHILE DRIVING 63 MPH, THE VEHICLE
5	STRUCK A SMALL DIP IN THE ROAD. THE STEERING BEGAN TO SHAKE VIOLENTLY AND
7	THE CONTACT LOST CONTROL. THE VEHICLE WILL NOT BE REPAIRED BECAUSE THE CONTACT WANTS THE VEHICLE REPLACED. THE MANUFACTURER STATED THAT THEY
	WERE AWARE OF THE FAILURE; HOWEVER, ADVISED HIM TO FOLLOW THE TSB
3	INSTRUCTION TO REPAIR THE FAILURE. THE FAILURE MILEAGE WAS 51,000 AND
)	CURRENT MILEAGE WAS 65,000. 1 Affected Product
)	
	April 10, 2009 NHTSA ID NUMBER: 10264951
2	Components: STEERING NHTSA ID Number: 10264951
	Incident Date December 18, 2005
Ļ	Consumer Location COTTONWOOD, AZ
•	Vehicle Identification Number 1FTSW21Y56E****
	Summary of Complaint
	CRASHNo
,	FIRENo
'	INJURIES0
	DEATHS0
	I HAVE A 2006 F-250 SUPER DUTY WITH ONLY 17,000 MILES, FROM THE DAY I PICKED IT UP NEW AT THE DEALER I NOTICE THAT EVERY TIME I HIT A RUT OR BUMP IN THE ROAD THERE WAS HUGE VIBRATIONS IN THE REAR END AND VERY NEAR LOSING
	CONTROL. RECENTLY I WAS TRAVELING ON A MAJOR INTERSTATE AT
	APPROXIMATELY 80 MPH AND ALL OF A SUDDEN THE FRONT END FELT LIKE BOTH
	WHEELS WERE COMING OFF AND THE STEERING WHEEL WAS SHAKING SO VIOLENTLY
	I NEARLY LOST CONTROL. I WAS BESIDE AN 18 WHEELER AND I THOUGHT THIS WOULD
	PROBABLY BE MY LAST DAY BUT SOMEHOW I GOT IT BACK UNDER CONTROL. CAN'T
	TELL YOU HOW NERVOUS I WAS BUT YOU CAN IMAGINE. I CALLED OUR LOCAL FORD
	DEALER TODAY AND HE SAID SOUNDS LIKE SOMETHING TERRIBLE IS WRONG, WE'LL
	SEE WHAT THE OUTCOME IS. EVERYTHING I'VE READ ON THIS SAYS FORD DOESN'T
	THINK THEY HAVE A PROBLEM, FROM THE STORIES OUT THERE I DISAGREE. *TR
	1 Affected Product
	October 1, 2007 NHTSA ID NUMBER: 10204597
	Components: STEERING, SUSPENSION
	NHTSA ID Number: 10204597
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	Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.32 Page 32 of 353
1	Incident Data Sentember 16, 2007
1	Incident Date September 16, 2007 Consumer Location HAMPDEN, MA
2	Vehicle Identification Number 1FTSW21516E**** Summary of Complaint
3 4	CRASHNo FIRENo
5	INJURIES0
6	<b>DEATHS0</b> MY 2006, 5.3 GAS ENGINE, 4 WHEEL DRIVE, F250 SUPER DUTY HAS HAD EXCESSIVE
7	WHEEL HOP, BOUNCING, VIBRATION, AND SOMETIMES, VIOLENT SHAKING OF THE WHOLE FRONT OF THE TRUCK, WHEN GOING OVER EXPANSION JOINTS, BUMPS AND
8	ROAD DEFECTS SINCE IT WAS NEARLY NEW. THIS RESULTS IN THE STEERING WHEEL
9	SHAKING AND MAKES THE TRUCK HARD TO CONTROL. WHEN NEW WITH 300 MILES ON IT IN FEB. 2007, I DROVE IT FROM MA TO FL AND NOTICED THAT SOMETIMES IT
10	SHUDDERED, WHEN GOING OVER A BUMP AT SPEEDS OVER 50. THAT IS, IT DID NOT JUST GIVE ONE HARD JOLT, BUT BOUNCED A FEW TIMES. THE BOUNCING GOT WORSE
11	AS MILEAGE ON THE VEHICLE WENT UP. SOMETIMES THE TRUCK WOULD MOVE LATERALLY AFTER A HARD BUMP, THAT IS, MOVE TO THE EDGE OF THE TRAVELED
12	LANE, OR PARTIALLY INTO ONE OF THE ADJACENT LANES. NOW, WITHIN THE LAST 2
13	WEEKS, AT ITS EXTREME OF VIBRATIONS AND BOUNCING, THE VIOLENT SHAKING HAS HAPPENED TO ME TWICE, BOTH TIMES WHEN TRAVELING ON A HIGHWAY AT 60-68
14	MPH, AFTER GOING OVER AN EXPANSION JOINT COMING OFF OR GOING ON TO A BRIDGE. FIRST TIME, ON SEPT 16, 2007, WITH ABOUT 9000 MILES ON THE F250, SHAKING
15	LASTED ABOUT 5 SECONDS, ON I64 IN VIRGINIA BEACH, VA, AND THEN, ON SEPT. 28, 2007, FOR ABOUT 10 SECONDS, OR ABOUT 1000', ON THE NEW JERSEY TURNPIKE.
16	DURING THESE LAST 2 INCIDENTS, I THOUGHT THAT I MIGHT EASILY HAVE LOST
17	CONTROL OF THE VEHICLE AND HAVE EITHER INJURED SOMEONE ELSE OR MYSELF. BOTH OF THE SERIOUS VIOLENT SHAKING EPISODES HAPPENED ON A DRY INTERSTATE
18	HIGHWAY IN DECENT CONDITION WITH OTHER TRAFFIC TRAVELING AT THE SAME SPEED AND MANY, MANY OTHER VEHICLES GOING OVER THE SAME BUMPS. I HAVE
19	CHECKED THE TIRE PRESSURE AND ALL THE TIRES READ ABOUT 50#, THE SAME AS
20	WHEN I GOT THE TRUCK ON JAN. 31, 2007. THERE ARE NO OBVIOUS DEFECTS IN THE TIRES. NOW, IT SHUDDERS WHEN GOING OVER VERY MINOR BUMPS, SOMETIMES EVEN
21	AT BELOW 45 MPH. I'VE MADE IT BACK FROM MY TRIP AND THERE ARE ABOUT 9500 MILES
22	ON THE TRUCK AND I AM TAKING IT TO THE DEALER THIS WEEK. THIS PROBLEM
23	COULD RESULT IN THE LOSS OF LIFE. *JB 1 Affected Product
24	
25	November 5, 2007 NHTSA ID NUMBER: 10208006
26	Components: SUSPENSION NHTSA ID Number: 10208006
27	Incident Date November 5, 2007 Consumer Location PATASKALA, OH
28	Vehicle Identification Number N/A
	-32-
	Class Action Complaint Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.33 Page 33 of 353
1	Summary of Complaint
2	CRASHNo FIRENo
3	INJURIESO
4	<b>DEATHS0</b> WHILE DRIVING HOME FROM WORK, I HIT A SMALL BUMP IN THE FREEWAY AT 65MPH
5	AND NEARLY LOST CONTROL OF MY 2006 F-250. THE VEHICLE BEGAN TO SHAKE
6	UNCONTROLLABLY AND VIOLENTLY. I TRIED TO REGAIN CONTROL OF MY DIRECTION WHICH ONLY HAPPENED AFTER I GOT BELOW 15 MPH. AFTER PULLING OFF THE
7	HIGHWAY, I GOT OUT TO CHECK WHICH TIRE HAD BLOWN AND TO MY SURPRISE ALL WERE FINE. IF I HADN'T HAVE BEEN IN THE FAR RIGHT HAND LANE OF THE FREEWAY, I
8	WOULD HAVE CAUSED AN ACCIDENT AND HURT EITHER MYSELF OR SOMEONE ELSE. THIS WAS NOT A TYPICAL VEHICLE RESPONSE AND WAS VERY LITERALLY A VIOLENT
9	WHEEL HOP OR FRONT END SUSPENSION MALFUNCTION. I CONSIDER THIS TO BE A
10	SERIOUS AND DANGEROUS ISSUE FOR F-250 OWNERS AND ALL WHO TRAVEL AROUND THEM. FORD NEEDS TO RE-CALL THESE FRONT END DEFECTS BEFORE SOMEONE GETS
11	KILLED. AFTER A THOROUGH SEARCH OF THE INTERNET, I DISCOVERED A MOUNTAIN
12	OF OTHER F-250 OWNERS WHO WERE AND ARE EXPERIENCING THE SAME PROBLEM WITH SIMILAR RESULTS, MOST CLAIMING THE SAME THING, THESE VEHICLES HAVE A
12	MAJOR LEAGUE PROBLEM WITH THE FRONT END SUSPENSION WHICH WILL UNDOUBTEDLY COST SOMEONE THEIR LIFE SOMEDAY. WHAT IS THE NHTSA DOING TO
14	BRING FORD TO THE TABLE AND GET THIS FIXED? IT'S TIME. *TR <b>1 Affected Product</b>
15	1 Antecteu 1 Toutet
16	Amil 16, 2008 NHTSA ID NUMBED, 10224740
17	April 16, 2008 NHTSA ID NUMBER: 10224740 Components: SUSPENSION
	NHTSA ID Number: 10224740
18	Incident Date March 1, 2008 Consumer Location BROWN CITY, MI
19	Vehicle Identification Number 1FTSW21P26E****
20	Summary of Complaint
21	CRASHNo FIRENo
22	INJURIES0
23	<b>DEATHS0</b> ON MY 2006 FORD F250 SD DIESEL I EXPERIENCE VIOLENT OSCILLATIONS OF THE
	STEERING WHEEL WHEN GOING OVER RR TRACKS OR BUMPS IN THE ROAD, LEADING
24 25	TO A NEAR LOST OF CONTROL OF THE VEHICLE. AS A RESULT OF THIS THE FRONT TIRES ARE FLAT SPOTTED, AND UNEVENLY WORN. FORD CLAIMS THE PROBLEM IS
23 26	RELATED TO LOW TIRE PRESSURE, BUT MY TIRE PRESSURE WAS AT THE MFG RECOMMENDATION. I HAVE READ NUMEROUS REPORTS THAT A STEERING DAMPENER
20	IS REQUIRED AND NOT INSTALLED ON THE FORD SD TRUCKS. *TR
	1 Affected Product
28	
	-33-

<b>Class Action Complaint</b>
Case No.

¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.34 Page 34 of 353
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	December 31, 2008 NHTSA ID NUMBER: 10253393 Components: SUSPENSION NHTSA ID Number: 10253393 Incident Date September 20, 2007 Consumer Location LAUREL, MD Vehicle Identification Number 1FTSX215X6E**** Summary of Complaint CRASHNO FIRENO INJURIESO DEATHSO THIS IS A SUSPENSION PROBLEM THAT I NOTICED ABOUT 9 MONTHS AFTER I BOUGHT THE VEH., (2006 FORD F-250SD). THE PROBLEM IS IN THE SUSPENSION. IT SEEMS TO ONLY HAPPEN WHEN YOU GO OVER AN AREA OF THE ROAD THAT IS ROUGH. IT HAS GOTTEN PROGRESSIVELY WORSE. I WAS DRIVING AT 60 MPH AND WENT OVER A BUMPY AREA ON THE HIGHWAY AND I ALMOST LOST CONTROL OF THE TRUCK. IT PULLED HARD TO THE LEFT AND BEGAN SHAKING HEAVILY. IF I HAD NOT BEEN HOLDING THE WHEEL FIRMLY I WOULD HAVE CROSSED THE DOUBLE YELLOW LINE INTO ONCOMING TRAFFIC. I FOUND A SITE WHERE THERE WERE 11 OTHER COMPLAINTS ON THIS SAME VEH. AND THE SAME PROBLEM. I HAVE OWNED F250'S INCLUDING MY LAST THAT WAS A 2002 AND I NEVER HAD A PROBLEM LIKE THIS. ITS APPARENT THAT THERE IS SOMETHING WRONG WITH THE SUSPENSION SYSTEM THEY USED. IF SOMEONE IS DRIVING THAT HASN'T EXPERIENCED IT THEY MAY LOOSE COMPLETE CONTROL OF THE VEHICLE AND CAUSE A FATALITY. I AM GOING TO TAKE IT TO A FORD DEALER TO LOOK AT, BUT FROM WHAT I READ OF THE OTHER COMPLAINTS SOME PEOPLE HAVE BEEN IN 3-4 TIMES AND STILL HAVE THE SAME PROBLEM. *TR 1 Affected Product
<ol> <li>19</li> <li>20</li> <li>21</li> </ol>	March 2, 2009 NHTSA ID NUMBER: 10260393 Components: SUSPENSION NHTSA ID Number: 10260393 Incident Date October 10, 2008
22	Consumer Location BELLEVUE, WA Vehicle Identification Number 1FTSX21PX6E****
23	Summary of Complaint CRASHNo
24 25	FIRENo INJURIES0
26	<b>DEATHS0</b> TRAVELING APPROXIMATELY 60MPH ON INTERSTATE HIGHWAY ON SOMEWHAT
27	UNDULATING CONCRETE SURFACE, VEHICLE EXPERIENCED EXTREME VIBRATING OF SUSPENSION SUCH THAT IT FELT LIKE THE AXLES WERE UNCONNECTED FROM THE VEHICLE FRAME. STEERING CONTROL BECAME DIFFICULT AND NEARLY LOST
28	CONTROL. *TR
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	Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.35 Page 35 of 353
1	1 Affected Product
2	April 21, 2009 NHTSA ID NUMBER: 10266214
4	Components: STEERING, SUSPENSION NHTSA ID Number: 10266214
5	Incident Date November 20, 2008
6	Consumer Location SACRAMENTO, CA Vehicle Identification Number 1FTSX21Y76E****
Ũ	Summary of Complaint
7	CRASHNo FIRENo
8	INJURIES0
9	DEATHS0 I RECEIVED A NOTICE FROM FORD MOTOR CO. REGARDING A SHIMMY OR SEVERE
10	VIBRATION THAT MAY OCCUR WHEN MY FORD F-250 FORD TRUCK TRAVELS OVER A
11	BUMP OR DIP IN THE ROAD. THIS HAS HAPPENED TO ME. AT THE TIME I HAD NO IDEA WHAT CAUSED IT. I WAS TRAVELING AT APPROX. 65 MPH ON A HIGHWAY WHEN I
12	DROVE TROUGH A DIP IN THE ROAD UNDER AN OVERPASS. MY TRUCK WENT IN A
13	SEVERE SHIMMY. I ALMOST LOST FULL CONTROL OF THE TRUCK. HAD THERE BEEN A VEHICLE NEXT TO ME IN THE LEFT LANE I WOULD NOT HAVE BEEN ABLE TO AVOID
14	HITTING IT. I DON'T KNOW WHAT THE PSI OF AIR IN MY TIRES WERE AT THE TIME.
15	THEY WERE THE STOCK TIRES THAT CAME WITH THE TRUCK OFF THE LOT. I HAVE SINCE CHANGED THESE TIRES DUE TO WEAR. THIS IS A VERY SERIOUS ISSUE AND
16	NEEDS TO BE GIVEN A LOT OF ATTENTION. *TR 1 Affected Product
17	
18	September 4, 2009 NHTSA ID NUMBER: 10282830
19	Components: SUSPENSION
20	NHTSA ID Number: 10282830 Incident Date September 2, 2009
20	Consumer Location LEBANON, TN
21	Vehicle Identification Number 1FTSX21PX6E**** Summary of Complaint
	CRASHNo
23	FIRENo INJURIES0
24	DEATHSO
25	HELLO; I HAVE A 2006 FORD SUPER DUTY 4X4 DIESEL. I HAVE LOW MILES 23,000 AND NO MODIFICATIONS TO TRUCK. I HAVE HAD A FEW TIMES WHERE THE FRONT END
26	WILL SHAKE AFTER HITTING A POT HOLE OR BRIDGE BUMP. IT NOW DID THIS AGAIN ON 9/2/2009 AND WAS VIOLENT AND DANGEROUS, ALMOST LOST CONTROL. I HAVE
27	SEARCHED THE INTERNET THIS MORNING AND ITS CALLED THE 'DEATH WOBBLE' AND
28	SEEMS ALOT OF FORD SUPER DUTY'S ARE EXPERIENCING THIS PROBLEM. PLEASE ADVISE ME WHAT STEPS TO TAKE AS I AM EXTREMELY CONCERNED. THANKS *TR
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	Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.36 Page 36 of 353
1	1 Affected Product
2	September 27, 2010 NHTSA ID NUMBER: 10357936
4	Components: SUSPENSION
	NHTSA ID Number: 10357936 Incident Date March 1, 2009
5	Consumer Location LEBANON, KY
6	Vehicle Identification Number 1FTSX215X6E****
7	Summary of Complaint CRASHNo
	FIRENo
8	INJURIES0
9	DEATHS0
10	I HAVE OWNED MY 2006 FORD SD SINCE DECEMBER 2008. SHORTLY AFTER WINTER DURING HIGH WAY DRIVING I EXPERIENCED VIOLENT SHAKING IN THE FRONT END
11	AFTER HITTING A POT WHOLE. I NEARLY LOST CONTROL OF THE VEHICLE WHICH
12	COULD HAS CAUSED A SERIOUS ACCIDENT. I RECEIVED A NOTICE FROM FORD EXPLAINING THAT I NEED TO KEEP THE TIRE PRESSURE AT THE RECOMMENDED LEVEL
13	OR IT WOULD CAUSE THE SHAKING. BUT THE AIR PRESSURE DID NOT CORRECT THE
	PROBLEM. I BECAME TOO AFRAID TO DRIVE THIS VEHICLE ON ANY EXPRESS WAYS
14	AND LIMITED DRIVING IT IN TOWN AND NON-EXPRESSWAY ROADS. AFTER A YEAR AND A HALF THIS VIOLENT SHAKING, I HAD TO BUY ANOTHER VEHICLE BECAUSE I
15	BECAME TO AFRAID THIS VEHICLE WOULD CAUSE A SERIOUS ACCIDENT. I STILL OWN
16	THIS VEHICLE BUT I ONLY TRUST IT IN TOWN DRIVING. *TR
	1 Affected Product
17	
18	May 21, 2011 NHTSA ID NUMBER: 10403273
19	Components: SUSPENSION
20	NHTSA ID Number: 10403273 Incident Date May 15, 2011
	Consumer Location Unknown
21	Vehicle Identification Number 1FTNF21516E****
22	Summary of Complaint
23	CRASHNo FIRENo
	INJURIES0
24	DEATHS0
25	UPON HITTING BUMPS ON ROADWAY I LOST COMPLETE CONTROL OF TRUCK FOR APPROX 2 TENTHS OF A MILE UNTIL I SLOWED DOWN. FRONT END SHOOK VIOLENTLY
26	SOMEBODY IS GOING TO DIE IN ONE OF THESE DEATH TRAPS,I HOPE ITS NOT ONE OF
27	MY KIDS
	1 Affected Product
28	
	-36-
	Class Action Complaint
	Case No.

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.37 Page 37 of 353
1	November 24, 2011 NHTSA ID NUMBER: 10437224
2	Components: STEERING, SUSPENSION
3	NHTSA ID Number: 10437224 Incident Date April 1, 2011
4	Consumer Location COVINA, CA Vehicle Identification Number N/A
5	Summary of Complaint CRASHNo
6	FIRENo
7	INJURIES0 DEATHS0
8	I WAS TRAVELING ON THE FREEWAY AT 60 MPH. THE VEHICLE WENT INTO A VIOLENT
9	SHAKING AFTER GOING OVER AN UNEVEN ROAD SURFACE. THE VEHICLE JUMPED A HALF LANE OVER AND I HAD LOST CONTROL UNTIL MY SPEED WAS REDUCED. AT
10	THAT TIME I WAS AFRAID OF SLAMMING ON THE BRAKES AND LOSING MORE CONTROL OR POSSIBLY FLIPPING OVER. NOW THIS VIOLENT SHAKING OCCURS EVERY
11	TIME I HIT A POT HOLE OR ANY UNEVEN SURFACE AT 55 TO 60 MPH. I HAVE TAKEN MY
12	VEHICLE TO FORD SERVICE AND THEY CAN NOT FIND ANY PROBLEM THAT WOULD CAUSE THE VIOLENT SHAKING. AFTER DOING SOME RESEARCH I FOUND A VIDEO OF
13	THIS ON YOU TUBE AS "F-250 DEATH WOBBLE". THIS VIDEO SAYS IT ALL AND IS BASED ON A STOCK ORIGINAL EQUIPMENT F-250 SUPER DUTY. *TR
14	1 Affected Product
15	
16	October 24, 2009 NHTSA ID NUMBER: 10289670
17	Components: STEERING NHTSA ID Number: 10289670
18	Incident Date October 23, 2009 Consumer Location FRESNO, CA
19	Vehicle Identification Number 1FTSW21P56E****
20	Summary of Complaint CRASHNo
20	FIRENo
21	INJURIES0 DEATHS0
22	I LOST CONTROL OF MY FORD F-250 TRUCK GOING DOWN THE ROAD. THE FRONT END STARTED A WOBBLE AND SHAKE. (DEATH WOBBLE) *TR
23	1 Affected Product
24	
26	January 19, 2011 NHTSA ID NUMBER: 10377213
20	Components: TIRES, STEERING NHTSA ID Number: 10377213
27	Incident Date December 19, 2010 Consumer Location RIVERSIDE, CA
28	Vehicle Identification Number 1FT5X21P46E****
	-37- Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.38 Page 38 of 353
1 2 3 4 5 6 7 8 9	Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2006 FORD F-250 DIESEL SD. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 60 MPH OVER A ROAD BUMP, HE MOMENTARILY LOST CONTROL OF THE VEHICLE ABNORMALLY UNTIL THE VEHICLE SPEEDS WAS SLOWED. THE VEHICLE WAS INSPECTED BY THE DEALER WHO INFORMED THE CONTACT THAT THE FAILURE COULD HAVE BEEN CAUSED BY UNDER INFLATED TIRES. THE VEHICLE WAS NOT REPAIRED. THE VIN WAS UNAVAILABLE. THE FAILURE AND CURRENT MILEAGE WAS 58,000. UPDATED 06/16/11 *BF UPDATED 06/27/11 1 Affected Product 1 Associated Document
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	September 21, 2011 NHTSA ID NUMBER: 10426658 Components: STEERING NHTSA ID Number: 10426658 Incident Date September 18, 2011 Consumer Location EL CENTRO, CA Vehicle Identification Number 1FTSW21P96E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT STATED THAT WHILE DRIVING 70 MPH OVER SMALL ROAD BUMPS, HE LOST CONTROL OF THE STEERING. THE VEHICLE BEGAN TO VIOLENTLY SHAKE UNTIL THE CONTACT STOPPED THE VEHICLE. THE FAILURE RECURRED WHENEVER THE CONTACT DROVE OVER ROAD BUMPS AT HIGHWAY SPEEDS. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHERE THE CONTACT WAS INFORMED THAT THE FAILURE WAS A COMMON OCCURRENCE. THE STEERING LINKAGES AND STEERING DAMPENER WERE REPAIRED. THE FAILURE RECURRED ONCE FOLLOWING REPAIRS. THE FAILURE MILEAGE WAS 43,200. UPDATED 10/13/11 *BF UPDATED 01/12/12
23	1 Affected Product 1 Associated Document
24 25	August 24, 2009 NHTSA ID NUMBER: 10281566
25 26	Components: SUSPENSION, STEERING NHTSA ID Number: 10281566
20	Incident Date June 1, 2008
28	Consumer Location Unknown Vehicle Identification Number 1FTWW33P46E****
20	Summary of Complaint
	-38- Class Action Complaint
	Case No.

0	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.39 Page 39 of 353
1 2 3 4 5 6 7 8 9	CRASHNO FIRENO INJURIESO DEATHSO TL*THE CONTACT OWNS A 2006 FORD F350 CREW CAB 4X4 WHICH WAS PURCHASED IN 2005. WHILE DRIVING APPROXIMATELY 25 MPH, THE CONTACT LOST STEERING CONTROL WHEN THE STEERING WHEEL BEGAN SHAKING EXCESSIVELY. THE MANUFACTURER STATED THAT THEY WERE AWARE OF THE FAILURE. THE MANUFACTURER ALSO CONFIRMED THAT THERE WERE NO RELATED RECALLS; HOWEVER, THERE WERE TECHNICAL SERVICE BULLETINS. THE FRONT END OF THE VEHICLE WAS REPLACED AS WELL AS PREVIOUS REPAIRS WERE PERFORMED TO CORRECT THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 10,000 AND THE CURRENT MILEAGE WAS 29,000. 1 Affected Product
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> </ol>	May 26, 2008 NHTSA ID NUMBER: 10228887 Components: STEERING NHTSA ID Number: 10228887 Incident Date May 10, 2008 Consumer Location SHADOW HILLS, CA Vehicle Identification Number N/A Summary of Complaint
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	CRASHNO FIRENO INJURIESO DEATHSO 06 F350 DUALLY DIESEL CREW CAB. WHEN DRIVING ANYWHERE BETWEEN 50-70 MPH AND HIT A POTHOLE THE FRONT END GOES INTO A DEATH WOBBLE AND IS NOT CONTROLLED UNTIL VEHICLE IS SLOWED TO 30 MPH. ALMOST LOST CONTROL OF VEHICLE ON LOS ANGELES FREEWAYS. HAS HAPPENED MULTIPLE TIMES AND HAVE BEEN TO FORD DEALER WITH NO ASSISTANCE. LAST EPISODE WAS LAST WEEK, THEN MY INSURANCE CO TOLD ME TO FILE COMPLAINT IN CASE OF ACCIDENT THAT IS NOT MY FAULT BUT A VEHICLE DEFECT. AAA ALSO SENT ME TO THIS FORUM OF OTHER FORD OWNERS THAT HAVE HAD THE SAME COMPLAINT. *TR 1 Affected Product
24 25 26 27 28	December 1, 2009 NHTSA ID NUMBER: 10294097 Components: STEERING NHTSA ID Number: 10294097 Incident Date November 30, 2009 Consumer Location HONOLULU, HI Vehicle Identification Number 1FTWW31P16E**** Summary of Complaint CRASHNo -39- Class Action Complaint
	Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.40 Page 40 of 353
1 2 3 4 5 6 7 8 9	FIRENO INJURIESO DEATHSO 2006 FORD F350 SUPERDUTY DIESEL DRIVING ON THE FWY MAKING A CURVE ABOUT 55MPH THE FRONT END STARTS TO HOP VIOLENTLY AND BOUNCING. ALMOST LOST CONTROL DUE TO OTHER CARS ON THE ROAD. I HAD TO APPLY MY BRAKES ON THE FWY IN A VERY UNSAFE MANNER AND LOCATION CAUSING CAR BEHIND ME TO VEER OFF IN MANY DIRECTIONS AS I CAME TO A HALT. THIS LOSS OF CONTROL HAPPENED ABOUT A DOZEN TIMES NOW IN THE LAST 2YEARS WITH ALWAYS THE SAME SITUATION FWY SPEEDS AND ANY TYPE OF BUMP IN THE ROAD SURFACE. HAPPENED ON UPHILL CURVES AS WELL AS FLAT OR DOWN HILL CURVES. A LESSER OF DRIVER MAY FAIL TO MAKE PROPER ADJUSTMENTS WHICH I SURE WILL LEAD TO A CRASH OR WORSE A DEATH. *TR 1 Affected Product
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> </ol>	October 29, 2014 NHTSA ID NUMBER: 10651012 Components: STEERING NHTSA ID Number: 10651012 Incident Date February 5, 2013 Consumer Location STOCKTON, CA Vehicle Identification Number N/A
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO STEERING WOBBLE AND SHAKES. THIS HAS BEEN GETTING WORSE AS TIME GOES ON. ANYTIME I HIT A BUMP ON THE FREEWAY MY TRUCK STARTS TO VIOLENTLY SHAKE AND WOBBLE. IT IS EVEN WORSE ON A ROAD CURVE. IT IS VERY DANGEROUS TO DRIVING ON THE FREEWAY IN THE MOUNTAINS. I FEW TIMES I ALMOST LOST CONTROL. THE SHAKE DOES NOT GO AWAY UNTIL I SLOW DOWN BELOW 40MPH WHICH CAUSES ANOTHER DANGEROUS SITUATION WHILE ON THE FREEWAY. I HAVE CHANGED TIRES, CHECKED PRESSURE AND ROTATED TIRES. ALSO, I REPLACED STEERING DAMPENER. NOTHING HAS WORKED TO DIMINISH THE SHAKE. I ALSO HAD THE 4 WHEEL ALIGNMENT CHECKED AND THE SHOP SHOWED ME THAT IT WAS CORRECT. THEY CHECKED EVERYTHING AND COULD NOT FIND ANYTHING THAT WAS WORN OUT AND NEEDED CHANGING. I WAS TOLD NO REPAIRS NEEDED. THIS IS A VERY DANGEROUS SITUATION AND NEEDS TO BE CORRECTED BEFORE BODIES START PILING UP. *TR 1 Affected Product
26 27	June 21, 2009 NHTSA ID NUMBER: 10274553
28	Components: SUSPENSION NHTSA ID Number: 10274553 -40-
	Class Action Complaint Case No.

C	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.41 Page 41 of 353
1 2 3 4 5 6 7 8 9 10 11 12	Incident Date June 11, 2009 Consumer Location JONESBOROUGH, TN Vehicle Identification Number 1FTWW33P86E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I OWN AN 06' FORD F350 SD. I FIRST NOTICED AN EXTREME TIRE SHIMMY/BOUNCE AT AROUND 15,000 MI, WHEN A POT HOLE, BRIDGE EXPANSION OR ROUGH ROAD IS ENCOUNTERED. THE TRUCK NOW HAS 105,000 MI. AND THE PROBLEM HAS BECOME SOME EXTREME THAT I BELIEVE IT IS TOO DANGEROUS TO DRIVE UNTIL THE PROBLEM IS REMEDIED. THE BOUNCING IS SO EXTREME THAT CONTROL OF THE TRUCK IS NEARLY LOST. FORD HAS SENT ME A LETTER CLAIMING IMPROPER TIRE PRESSURE IS THE PROBLEM, I HAVE ADJUSTED BUT TO NO HELP. THE TRUCK SHIMMYS/ SHAKES UNCONTROLLABLY, AT EVERY BUMP ENCOUNTERED. THIS IS AN EXTREMELY DANGEROUS SITUATION WHICH IS WIDE SPREAD AMONG SD OWNERS ACCORDING TO POSTINGS ON THE WEB. PLEASE HELP! *TR 1 Affected Product
13	
14	November 2, 2010 NHTSA ID NUMBER: 10363770 Components: SUSPENSION
15	NHTSA ID Number: 10363770 Incident Date August 15, 2010
16	Consumer Location LOOMIS, CA
17	Vehicle Identification Number 1FTWW33P36E**** Summary of Complaint
18	CRASHNo FIRENo
19	INJURIES0
20	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2006 FORD F-350 SUPER DUTY. THE CONTACT WAS DRIVING
21	APPROXIMATELY 60 MPH OVER A ROAD BUMP WHEN THE CONTACT LOST ALL STEERING CONTROL. HE HAD TO DECREASE THE VEHICLES' SPEED TO 30 MPH TO
22	REGAIN STEERING CONTROL. THE VEHICLE WAS TAKEN TO A LOCAL MECHANIC
23	WHERE THE STEERING BUSHING, SHOCKS, LOWER CONTROL, AND IDLER ARMS WERE REPLACED. THE FAILURE RECURRED WITHIN THREE WEEKS OF THE REPAIRS. THE
24	CONTACT LOCATED AN INVESTIGATION (NHTSA ITEM NUMBER: PE07057- SUSPENSION:FRONT) WHICH DESCRIBED FAILURE AND INQUIRED WITH THE DEALER.
25	THE DEALER SET THE TIRE PRESSURE TO THE CORRECT MANUFACTURER'S
26	SPECIFICATIONS TO CORRECT THE FAILURE. THE FAILURE MILEAGE WAS 86,800 AND THE CURRENT MILEAGE WAS 86,444.
27	1 Affected Product
28	
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	Class Action Complaint Case No.

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1	August 19, 2008 NHTSA ID NUMBER: 10238850
2	Components: STEERING, SUSPENSION
	NHTSA ID Number: 10238850
3	Incident Date August 18, 2008 Consumer Location ALEXANDRIA, LA
4	Vehicle Identification Number 1FTSX21537E****
5	Summary of Complaint
ć	CRASHNo FIRENo
6	INJURIES0
7	DEATHS0
8	TL*THE CONTACT OWNS A 2007 FORD F250. WHILE DRIVING APPROXIMATELY 70 MPH, THE VEHICLE DROVE OVER A SMALL PATCH IN THE ROAD. THE STEERING WHEEL
9	BEGAN TO SHAKE VIOLENTLY AND THE CONTACT LOST CONTROL OF THE VEHICLE.
-	THE VEHICLE SKIDDED ONTO THE SIDE OF THE ROAD. AFTERWARDS, THE CONTACT
10	DROVE ANOTHER FIVE MILES TO HIS DESTINATION. THE VIN WAS UNKNOWN. THE
11	CURRENT AND FAILURE MILEAGES WERE 4,000. 1 Affected Product
12	
13	
	September 24, 2009 NHTSA ID NUMBER: 10285160
14	Components: SUSPENSION NHTSA ID Number: 10285160
15	Incident Date August 20, 2008
16	Consumer Location DOVER, DE
	Vehicle Identification Number 1FTWW33P47E**** Summary of Complaint
17	CRASHNo
18	FIRENo
19	INJURIES0
20	<b>DEATHS0</b> THERE IS A SEVERE SHAKING IN MY FORD F30 SUPER DUTY TRUCK THAT IIS GETTING
	WORSE. STARTED OUT AS GOING OVER BUMPS OR AROUND CORNERS . TOOK IT TO
21	DEALER RIGHT AFTER I BOUGHT IT. THEY SAID NEEDED ALIGNING. THEN AFTER
22	CHARGING ME FOR IT SAID EVERYTHING WAS OK(FAILING TO NOTE MY TIRE DEPTH ON PAPER, WHICH TIRE TREAD WAS EXCELLENT). TOOK IT BACK SEVERAL MONTHS
23	LATER WHEN IT CONTINUED TO GET WORSE AND TREAD WEAR STARTED.PUT ON
24	MACHINE SAID IT WAS ALL GOOD. FAILED TO NOTE DEPTH AGAIN. THEN RECEIVED
	LETTER "LITERATURE PROGRAM 09L02, STATING IN LESS WORDS THAT THEY KNOW OF THE PROBLEM BUT DON'T DEEM IT THEIR FAULT , JUST SLOW DOWN WHEN IT
25	HAPPENS. CALLED FORD TOLD ME TO TAKE IT IN DEALER. TOOK IT IN, NOW THEY ARE
26	SAYING IT BECAUSE OF THE POOR TIRE TREAD ON TIRES, WHICH WAS PERFECT WHEN I
27	FIRST STARTED TO COMPLAIN ABOUT THE SHIMMY. NOW THEY WANT ME TO BUY
	NEW TIRES AND START ALL OVER AGAIN .AFTER GETTING NEW TIRES THEY WANT ME TO BRING IT IN SO THEY CAN CHARGE ME TO PUT IT BACK ON THE ALIGNMENT
28	MACHINE.THIS IS A NEVER ENDING CYCLE. WHEN ASKED ABOUT THE LETTER THEY
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	Class Action Complaint
	Case No.

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1 2 3 4 5 6 7 8 9	SENT, AFTER I STATED THAT ITS A KNOWN ISSUE, THEY KEPT SAYING ITS THE CUSTOMERS FAULT FOR NOT MAINTAINING PROPER TIRE PRESSURE. I FIND THAT HARD TO BELIEVE SINCE IM IN THERE REGULARLY TO GET MY TIRE PRESSURE CHECKED SINCE I TRAVEL ALOT.AT THE CAMPGROUND I GO TO THERE ARE 3 OTHER FORD F 350 SIMILAR TO MINE HAVING THE SAME SEVERE SHAKE AND BOUNCE AS MINE AND ARE HAVING THE SAME WEAR(WHICH IS DIFFERENT ON EACH OF THE FRONT TIRES). EVEN AFTER THE LAST TIME I TOOK IT IN TO GET THE AIR FILLED, ONE OF THE TECHS NOTICED THE TIRE WEAR AND INFORMED ME THAT " FORD KNOWS THESE FRONT ENDS ARE JUNK AND CAUSE PROBLEMS BUT THEY TRY TO BLAME THE CUSTOMER AND MOST BUY IT" PLEASE HELP I FEEL VERY UNSAFE IN THIS TRUCK AS I HAVE ALMOST LOST CONTROL ON THE HIGHWAY, STRAIGHT AWAYS AND CURVES, JUST FROM THE BOUNCE AND SHIMMY. *TR 1 Affected Product
10 11 12	February 22, 2014 NHTSA ID NUMBER: 10565456 Components: SUSPENSION, STEERING NHTSA ID Number: 10565456
13 14	Incident Date February 22, 2014 Consumer Location MANCHESTER, MD Vehicle Identification Number 1FTWW31P27E****
15 16	Summary of Complaint CRASHNo FIRENo INJURIES0
17 18 19	<b>DEATHS0</b> I WAS DRIVING ON AND OVERPASS/ EXIT RAMP AND PASSED OVER A STEEL DIVIDER ON THE HIGHWAY. UPON DOING SO I TEMPORARILY LOST CONTROL OF THE STEERING ON THE TRUCK AND HAD TO DECELERATE AND MOVE TOWARDS THE SHOULDER. I RECEIVED AN INFORMATION BULLETIN FROM FORD ABOUT THIS POTENTIAL
20 21 22	"STEERING WOBBLE" AND MADE SURE TO CHECK OUT ALL OF THEIR RECOMMENDATIONS. AFTER DOING SOME RESEARCH ONLINE I FEEL AS THOUGH THIS IS A MAJOR ISSUE AND FORD SHOULD BE DOING SOMETHING BEFORE MORE PEOPLE ARE INJURED OR KILLED. THERE ARE SEVERAL ONLINE FORUMS ADDRESSING THIS ISSUE AND IT SEEMS AS THOUGH FORD IS NOT BEING HELD RESPONSIBLE. *TR
23 24	1 Affected Product
25 26 27 28	November 2, 2010 NHTSA ID NUMBER: 10363678 Components: STEERING NHTSA ID Number: 10363678 Incident Date April 17, 2009 Consumer Location Unknown Vehicle Identification Number 1FTWW33P07E**** Summary of Complaint -43-
	Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.44 Page 44 of 353
1 2 3 4 5 6 7 8 9 10 11 12	CRASHNO FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2007 FORD F-350 SUPER DUTY. THE CONTACT STATED THAT HE NOTICED A SEVERE WOBBLE IN THE VEHICLE WHEN DRIVING 65-70 MPH AND WHEN CARRYING HEAVY LOADS. THE CONTACT REFERRED TO THE FAILURE AS A DEATH WOBBLE AND STATED THAT THE FAILURE WOULD CAUSE HIM TO MOMENTARILY LOSE CONTROL OF THE VEHICLE. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHERE THE CONTACT WAS AWAITING A DIAGNOSIS OF THE FAILURE AND REPAIRS. THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS APPROXIMATELY 20,000 AND THE CURRENT MILEAGE WAS APPROXIMATELY 30,000. UPDATED 01/13/11*BF THE CONSUMER STATED HE LOST COMPLETE CONTROL OF THE STEERING. THE CONSUMER WAS ABLE TO REGAIN CONTROL AFTER SLOWING DOWN TO 45 MPH, WHICH DID TAKE SOME TIME. THE DEALER REFUSED TO ASSIST THE CONSUMER WITH THE COST. THE CONSUMER REQUESTED TO HAVE THE FRONT STEERING COMPONENTS MODIFIED AT HIS EXPENSE. UPDATED 04/04/11 1 Affected Product 1 Associated Document
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	July 29, 2010 NHTSA ID NUMBER: 10346223 Components: STEERING NHTSA ID Number: 10346223 Incident Date July 26, 2010 Consumer Location JESUP, IA Vehicle Identification Number 1FTSX21568E**** Summary of Complaint CRASHNO FIRENO INJURIES0 DEATHS0 I BOUGHT A 2008 FORD F-250 EXTENDED CAB TRUCK AND WHEN I GO OVER A SMALL BUMP IN THE ROAD THE FRONT END SHAKES REAL BAD TO THE POINT I ALMOST LOST CONTROL GOING DOWN A HIGHWAY AT 55MPH. I CHECKED THE AIR PRESSURE IN THE TIRES AND THEY WERE AT 70PSI IN THE FRONT AND 80PSI IN THE BACK. THE DOOR STICKER SAID THE PRESSURES SHOULD BE 70 IN THE FRONT AND 80 IN THE BACK. I HAVE REPLACED THE SHOCKS AND STEERING STABILIZER SHOCK AND IT DID NOT MAKE A DIFFERENCE. THE OLD SHOCKS APPEARED TO BE IN GOOD SHAPE YET. I THEN REPLACED THE TIRES EVEN THOUGH THEY WERE STILL GOOD AND THEY WERE WORN EVENLY. STILL DID NOT FIX IT. I THEN DROPPED MY AIR PRESSURE IN THE TIRES TO 60PSI FRONT AND BACK TO IF IT MADE A DIFFERENCE. STILL DID NOT FIX IT. I HAD THEY DEALERSHIP LOOK AT IT AND THEY SAID THEY COULD NOT FIND ANYTHING WRONG WITH IT. I OWNED A 1999 F-250 AND IT NEVER HAD THIS PROBLEM. I HAD 165,000 MILES ON IT WHEN I TRADED IT IN FOR THIS ONE. I GOOGGLED MY PROBLEM AND FOUND A LOT OF PEOPLE WITH THE SAME PROBLEM. FORD NEEDS TO COME UP WITH A REPAIR
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	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.45 Page 45 of 353
1 2 3 4 5	FOR THIS SOON. I WON'T LET MY WIFE DRIVE THIS TRUCK FOR FEAR OF THIS HAPPENING AND HER ENDING UP IN A WRECK. FORD NEEDS TO THINK ABOUT THE PEOPLE AND CHILDREN THAT RIDE IN THERE VEHICLES AND THE LIVES THAT THEY COULD TAKE. I AM A FORD DRIVER ALL MY VEHICLES ARE FORD AND I'M NOT MAD AT FORD YET BUT THEY NEED TO CURE THIS PROBLEM. THIS PROBLEM IS FOR SURE A DESIGN FLAW. *TR 1 Affected Product
6 7 8 9 10 11 12	March 17, 2009 NHTSA ID NUMBER: 10262107 Components: STEERING NHTSA ID Number: 10262107 Incident Date June 10, 2008 Consumer Location Unknown Vehicle Identification Number 1FDWW35R08E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>10</li> </ol>	TL*THE CONTACT OWNS A 2008 FORD F-350 SD. THE CONTACT STATED THAT THE FRONT END OF THE VEHICLE WOULD SHIMMY AND SHAKE WHILE DRIVING APPROXIMATELY 50 MPH. ON ONE OCCASION, THE STEERING WHEEL SHOOK SO SEVERELY THAT HE LOST CONTROL OF THE VEHICLE AND VEERED OFF THE ROAD. THERE WERE NO INJURIES. THE CONTACT TOOK THE VEHICLE TO THE DEALER FOR REPAIRS, BUT THE FAILURE PERSISTED. HE FILED A COMPLAINT WITH THE MANUFACTURER, BUT HAS YET TO RECEIVE ANY FEEDBACK. THE CURRENT MILEAGE WAS APPROXIMATELY 42,600 AND FAILURE MILEAGE WAS APPROXIMATELY 15,000. <b>1</b> Affected Product
19 20	
20 21	March 3, 2010 NHTSA ID NUMBER: 10316308 Components: STEERING
21	NHTSA ID Number: 10316308 Incident Date January 2, 2009
22	Consumer Location SAN BERNARDINO, CA Vehicle Identification Number 1FTWW33R68E****
24	Summary of Complaint
25	CRASHNo FIRENo
26	INJURIES0 DEATHS0
27 28	I HAVE A 2008 FORD F-350 DUALLY THAT WHEN HITTING A DIP/BUMP IN THE ROAD AT SPEEDS ABOVE ABOUT 35, THE ENTIRE FRONT END SHAKES/SHIMMYS SO BAD THAT YOU CAN'T EVEN CONTROL IT! I RECEIVED A LETTER IN THE MAIL FROM FORD IN
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	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.46 Page 46 of 353
1 2 3	APRIL 2009 BASICALLY SAYING WHEN IT HAPPENS SLOW DOWN. THE DEALER REFUSES TO DO ANYTHING. SOMEONE IS GOING TO GET KILLED IF THIS IS NOT FIXED. *TR 1 Affected Product
4	May 29, 2012 NHTSA ID NUMBER: 10459926
5	Components: STEERING, SUSPENSION
6	NHTSA ID Number: 10459926 Incident Date May 29, 2012
7	Consumer Location MIDLAND, TX
8	Vehicle Identification Number N/A Summary of Complaint
	CRASHNo
9	FIRENo INJURIES0
10	DEATHSO WILL E DRIVING ABOUT COMPLIANT OVER AN
11	WHILE DRIVING ABOUT 60MPH ON LOOP 250 HERE IN MIDLAND, TX I WENT OVER AN OVERPASS CHANGING FROM THE PAVEMENT TO CONCRETE. AT THAT POINT I
12	COMPLETELY LOST CONTROL OF THE VEHICLE DUE TO VERY BAD FRONT WHEEL WOBBLE. I WAS ONLY ABLE TO REGAIN CONTROL BY COMING TO ALMOST A
13	COMPLETE STOP VERY CLOSELY AVOIDING AN ACCIDENT. I HAVE NOTICED THIS
14	DEATH WOBBLE BEFORE ON MY 2007 FORD F-250 AND NOW IT HAS STARTED ON MY 2010. I TOOK THE 2007 TO THE DEALER MANY TIMES AND THEY COULD NEVER
15	DUPLICATE THE PROBLEM OR WOULD USE AN EXCUSE THAT THEY ADJUSTED THE AIR
16	PRESSURE ON TIRES. THIS PROBLEM IS A MAJOR ISSUE AND WILL CAUSE SERIOUS ACCIDENTS IF IT HAS NOT ALREADY. AFTER ARRIVING AT WORK I SEARCHED THE
17	INTERNET FOR OTHERS WITH SIMILAR PROBLEMS AND IT SEEMS ALL FORD F-250 4X4'S
18	HAVE THE SAME ISSUE ALL THEY WAY UP TO THE CURRENT MODEL. THERE ARE TONS OF YOUTUBE VIDEOS SHOWING EXACTLY WHAT HAPPENED TO ME STATING THAT
19	FORD WILL NOT CORRECT THE PROBLEM. SOMETHING NEEDS TO BE DONE!
20	HTTP://WWW.YOUTUBE.COM/WATCH?V=8EUQ6F8RGT4 HTTP://WWW.YOUTUBE.COM/WATCH?V=PSDBCV-GCS8
21	HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER-
22	DUTY/T0SGDCTMOBHE5JER1/P13 HTTP://WWW.RACE- DEZERT.COM/FORUM/SHOWTHREAD.PHP/82022-F250-QUOT-DEATH-WOBBLE-QUOT-
	STEERING-ISSUE. *TR 1 Affected Product
23	
24	July 24, 2013 NHTSA ID NUMBER: 10531702
25	Components: STEERING, SUSPENSION
26	NHTSA ID Number: 10531702 Incident Date July 22, 2013
27	Consumer Location PELHAM, NH
28	Vehicle Identification Number N/A Summary of Complaint
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	Class Action Complaint
	Case No.

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1 2 3 4 5 6 7 8 9 10	CRASHNO FIRENO INJURIESO DEATHSO I JUST BOUGHT THIS VEHICLE AND WAS DRIVING THE HIGHWAY AT 65 MPH. I WENT OVER THE EXPANSION JOINT ON A BRIDGE AND LOST CONTROL OF THE VEHICLE. IT JUMPED INTO THE NEXT LANE. THANK GOD NO ONE WAS IN THE OTHER LANE AND NO ONE GOT HURT. MY FAMILY AND OTHERS COULD HAVE BEEN KILLED. THE DEALERSHIP SAID THE STEERING DAMPER WAS BAD. I'M SORRY BUT A BAD STEERING DAMPER WHEN YOU ARE TRAVELING 65 MPH OVER A SMALL BUMP SHOULD NOT MAKE YOUR VEHICLE JUMP INTO THE NEXT LANE AND LOOSE CONTROL. THIS MUST BE FIXED BY FORD. I AM READING THAT OTHER PEOPLE HAVE HAD TO HAVE ALL OF THE FRONT END PARTS REPLACED AND THEN THE PROBLEM RETURNS AGAIN. WHAT IS THE NHTSA DOING ABOUT THIS? DO NOT HAVE VIN AT THIS TIME MY TRUCK IS AT THE DEALERS. *TR 1 Affected Product
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	September 20, 2015 NHTSA ID NUMBER: 10765447 Components: STEERING NHTSA ID Number: 10765447 Incident Date September 20, 2015 Consumer Location PUYALLUP, WA Vehicle Identification Number 1FTSW2BR3AE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 DRIVING DOWN THE FREEWAY. HIT A SMALL POTHOLE ON THE HIGHWAY AND LOST CONTROL OF THE VEHICLE DUE TO A "DEATH WOBBLE" THAT FELT LIKE IT WAS FROM THE FRONT END. IT FELT LIKE THE FRONT OF THE TRUCK WAS GOING TO BE RIPPED OFF. 1 Affected Product
22 23 24 25 26 27 28	January 19, 2013 NHTSA ID NUMBER: 10493509 Components: SUSPENSION, STEERING NHTSA ID Number: 10493509 Incident Date January 19, 2013 Consumer Location COCHRANVILLE, PA Vehicle Identification Number 1FT7W2B60BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 -47- Class Action Complaint Case No.

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1 2 3 4 5 6	DEATHS0 TRAVELING ON A HIGHWAY AND HIT A SLIGHT BUMP AND A VIOLENT SHAKING STARTED. THE BRAKES WERE APPLIED AND I MANAGED TO PULL ONTO THE SHOULDER. THE SHAKING CONTINUED UNTIL THE TRUCK STOPPED. ALMOST LOST CONTROL OF THE VEHICLE. AFTER INSPECTING THE VEHICLE, FINDING NOTHING WRONG, I CONTINUED TO MY DESTINATION. AN INTERNET SEARCH SHOWS THIS IS A COMMON PROBLEM, AND THE REPORTS I READ MOST CONSIDER IT A VERY DANGEROUS PROBLEM. *TR 1 Affected Product
<ul> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> </ul>	July 21, 2013 NHTSA ID NUMBER: 10526016 Components: STEERING, WHEELS, SUSPENSION NHTSA ID Number: 10526016 Incident Date July 4, 2013 Consumer Location DALLAS, TX Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I HAVE HAD REPEATED ISSUES WITH THE STEERING OF MY TRUCK. I HAVE TAKEN IT IN TO THE FORD DEALERSHIP FOR THE LAST 2 YEARS AND HAVE BEEN UNABLE TO GET THIS RESOLVED. THE ISSUE IS KNOWN AS THE "DEATH WOBBLE". I WAS UNAWARE OF HOW COMMON THIS ISSUE WAS UNTIL I STARTED READING FORMS WHERE MANY PEOPLE HAVE HAD THE SAME COMPLAINT. I HAVE NEARLY LOST CONTROL OF MY
18	TRUCK WAY TOO MANY TIMES. *TR 1 Affected Product
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	June 10, 2014 NHTSA ID NUMBER: 10597434 Components: SUSPENSION, STEERING NHTSA ID Number: 10597434 Incident Date May 1, 2014 Consumer Location EL PASO, TX Vehicle Identification Number 1FT7W2BT8BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 MY TRUCK STARTS SHAKING VIOLENTLY AT 40-60 MPH. STEERING CONTROL IS LOST AND CAN ONLY BE REGAINED BY COMING TO A COMPLETE STOP. TRUCK WILL NOT SWITCH LANES AND PULLING OVER TO THE SHOULDER IS IMPOSSIBLE DUE TO LOSS OF STEERING. SHAKING IS VIOLENT TO THE POINT OF LOOSENING BOLTS. TAKEN TO -48-
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1 2 3 4 5	DEALER TO BE CHECKED UNDER WARRANTY. THEY CLAIMED IT WAS AIR PRESSURE OR THE NEED FOR NEW TIRES. THE VEHICLES TIRES ARE IN GOOD CONDITION AND AIR PRESSURE IS SET AT FACTORY RECOMMENDED LEVELS. FORD SAYS THIS BEHAVIOR IS NORMAL. A SERIOUS ACCIDENT EXTREMELY POSSIBLE. AN INDEPENDENT SUSPENSION SHOP CLAIMS ISSUE IS DUE TO DEFECTIVE BALL JOINTS, LACK OF STEERING DAMPER, AND DEFECTIVE CONTROL ARMS. *TR 1 Affected Product
6	
7	October 23, 2014 NHTSA ID NUMBER: 10649518 Components: STEERING, SUSPENSION
8	NHTSA ID Number: 10649518
9	Incident Date October 22, 2014 Consumer Location ZEBULON, NC
-	Vehicle Identification Number 1FT7W2BT9BE****
10	Summary of Complaint
11	CRASHNo FIRENo
12	INJURIES0
13	<b>DEATHS0</b> MY HUSBAND WAS DRIVING THROUGH A ROAD CONSTRUCTION WORK ZONE WHEN
14	SUDDENLY THE STEERING WHEEL STARTED SHAKING VIOLENTLY AND JUMPED OUT
	OF HIS HANDS . HE LOST CONTROL OF THE TRUCK . THE OTHER DRIVERS WERE ABLE
15	TO COMPENSATE FOR THE OUT OF CONTROL TRUCK AND AN ACCIDENT WAS AVOIDED . I WENT ON TO RESEARCH THIS ISSUE . I FOUND A FORUM WITH MANY OTHERS
16	HAVING THE SAME ISSUE . MY HUSBAND TOOK IT TO THE LOCAL DEALERSHIP WHERE
17	THEY SAY THEY HAVE NO KNOWLEDGE OF SUCH ISSUES . THEY TOLD HIM IT WAS POOR TIRE PRESSURE OR OUT OF ALIGNMENT . MY HUSBAND HAD BOTH CHECKED
18	AND THERE WAS NO PROBLEM . I FEAR IT IS JUST A MATTER OF TIME BEFORE THERE IS
19	A SEVERE ACCIDENT DUE TO THIS ISSUE . THE OTHERS SAY THE VEHICLE CONTINUES
20	TO DO THE" DEATH WOBBLE" AS IT HAS BEEN COINED ONLINE . PLEASE HAVE SOMEONE LOOK INTO THIS PROBLEM . I HAVE ALSO EMAILED FORD MOTOR COMPANY
	. *TR
21	1 Affected Product
22	
23	August 27, 2015 NHTSA ID NUMBER: 10759761
24	Components: STEERING, SUSPENSION NHTSA ID Number: 10759761
25	Incident Date August 22, 2015
26	Consumer Location BENNINGTON, NH Vehicle Identification Number N/A
27	Summary of Complaint
	CRASHNo
28	FIRENo INJURIESO
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	Class Action Complaint
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.50 Page 50 of 353
1 2 3 4 5 6 7 8	<b>DEATHS0</b> PURCHASED 2011 F-250 86000 MILES ON IT. GOING HOME ON THE HIGHWAY RIGHT AFTER I BOUGHT THE TRUCK WE WENT OVER A ROUGH PATCH OF ROAD AND THE TRUCK VIBRATED AND SHOOK SO BAD WE NEARLY LOST CONTROL. HAD TO STOP ON A BUSY HIGHWAY SHOULDER AND LOOK TO SEE IF WE HAD A FLAT TIRE. NOTHING OBVIOUS BUT BROUGHT IT TO OUR MECHANIC ANYWAYS A COUPLE DAYS LATER. EVERY BUMP ON THE ROAD WILL NOW CAUSE THIS REACTION AND AT HIGHWAY SPEEDS COULD BE DEVASTATING. OUR MECHANIC IS GOING TO TRY A NEW STEERING STABILIZER AND FRONT AXLE JOINTS BUT I FEAR THIS TRUCK HAS THE DREADED "DEATH WOBBLE". VERY DANGEROUS ISSUE THAT FORD WILL NOT ADDRESS. <b>1 Affected Product</b>
9	December 6, 2016 NHTSA ID NUMBER: 10930180 Components: SUSPENSION, STEERING
10	NHTSA ID Number: 10930180 Incident Date October 15, 2016
11	Consumer Location WILLIS, TX
12	Vehicle Identification Number 1FT7W2BT0BE**** Summary of Complaint
13	CRASHNo FIRENo
14	INJURIES0
15	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 70 MPH, THE CONTACT
16	LOST CONTROL OF THE VEHICLE. IT TOOK SEVERAL SECONDS FOR THE CONTACT TO
17	REGAIN CONTROL. THE FAILURE RECURRED SEVERAL TIMES. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO DIAGNOSED THAT THE SUSPENSION
18	SYSTEM FAILED. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED
19	OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 100,000. <b>1 Affected Product</b>
20	
21	May 9, 2018 NHTSA ID NUMBER: 11092739
22	Components: SUSPENSION NHTSA ID Number: 11092739
23	Incident Date March 14, 2018
24	Consumer Location STANSBURY PARK, UT Vehicle Identification Number 1FT7W2BTXBE****
25	Summary of Complaint CRASHNo
26	FIRENo
27	INJURIES0 DEATHS0
28	I BOUGHT THIS TRUCK CERTIFIED USED IN 2011 WITH APPROXIMATELY 9000 MILE ON
	IT. MY PROBLEM STARTED WHEN THE TRUCK HAD ABOUT 20000 MILES, MORE OR LESS.
	-50- Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.51 Page 51 of 353
1 2 3 4 5 6 7 8	IT EXPERIENCES THE FAMOUS FORD DEATH WOBBLE REPEATEDLY WHEN DRIVING AT HIGHWAY SPEED AND ENCOUNTERING A SMALL BUMP OR HOLE IN A ROAD. IT IS PARTICULARLY BAD WHEN TRAVELING BETWEEN 50 AND 65 MPH AND MAKING SLIGHT LEFT TURN AS MAY BE ENCOUNTERED ON A FREEWAY ENTRANCE OR EXIT. THE SHAKING IS SO BAD THAT STEERING CONTROL CAN BE TOTALLY LOST. THE ONLY WAY TO STOP THE SHAKING IS TO COME TO NEARLY A FULL STOP WHICH CAN BE EXCEPTIONALLY DANGEROUS ON HIGH SPEED FREEWAYS AND HIGHWAYS. I HAVE READ AND HEARD OF MANY OTHER COMPLAINTS OF THE SAME NATURE INVOLVING FORD PICKUPS FOR 2011 AND OTHER YEARS. EACH TIME THE PROBLEM SEEMS TO BE BEING IGNORED BY FORD AS "NORMAL" OR BY THE NHTSA DUE TO THE LACK OR A RECALL OR SUGGESTED FIX. <b>1 Affected Product</b>
9 10	November 29, 2012 NHTSA ID NUMBER: 10486413 Components: SUSPENSION, STEERING
11 12	NHTSA ID Number: 10486413 Incident Date November 25, 2012 Consumer Location BENSON, VT Vehicle Identification Number 1FTRF3DTXBE****
13 14	Summary of Complaint CRASHNo FIRENo
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> </ol>	FIRENO INJURIESO DEATHSO THE TRUCK VIOLENTLY STARTED SHAKING AFTER HITTING SEVERAL SMALL BUMPS IN ROAD. ALMOST LOST CONTROL OF TRUCK. IN ORDER FOR SHAKING TO STOP I HAD TO SLOW TRUCK DOWN TO 25 MPH. I ALMOST WAS REAR ENDED BY A TRUCK FOLLOWING ME. THE SHAKE FEELS LIKE THE FRONT WHEELS ARE ABOUT TO COME OFF. THIS HAS HAPPENED ALMOST A DOZEN TIMES SINCE THE TRUCK WAS BOUGHT NEW. *TR 1 Affected Product
22 22 23 24 25	June 7, 2015 NHTSA ID NUMBER: 10723796 Components: STEERING NHTSA ID Number: 10723796 Incident Date June 6, 2015 Consumer Location FARIBAULT, MN Vehicle Identification Number 1FT8W3BT7BE****
26 27 28	Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO
	-51- Class Action Complaint
	Case No.

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.52 Page 52 of 353
1 2 3 4 5	I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. THE DEALER SAYS THERE IS NOTHING WRONG AND HAVE REPLACED TIE ROD ENDS ALONG WITH BRAKES. 1 Affected Product
6 7 8	March 15, 2013 NHTSA ID NUMBER: 10503219 Components: STEERING, SUSPENSION NHTSA ID Number: 10503219 Incident Date January 15, 2013
9 10 11	Consumer Location WEST MONROE, LA Vehicle Identification Number 1FT7W2BT7CE**** Summary of Complaint CRASHNo
11 12 13	FIRENO INJURIESO DEATHSO WHILE DRIVING 60 MPH, TRUCK HIT IRREGULARITIES IN THE ROAD. VEHICLE STARTED
14 15	SHAKING VIOLENTLY AND LOST CONTROL OF THE STEERING. VEHICLE HAD TO BE SLOWED TO 10-15 MPH BEFORE THE SHAKING STOPPED. NO ACCIDENT OR INJURY OCCURRED ON THIS INCIDENT. TRUCK WAS TAKEN TO DEALER AND TRACK BAR ASSY / BUSHING WAS REPLACED. THE SECOND SERIOUS INCIDENT WAS @ 48,000 MILES A
16 17 18	MERE 11,000 MILES LATER. WHILE TRAVELING 55-60 MPH THROUGH A LEFT HAND CURVE AND CROSSING ANOTHER IRREGULARITY IN THE ROAD (BRIDGE-PAVEMENT JOINT) THE TRUCK AGAIN BEGAN SHAKING VIOLENTLY AND CAUSED THE VEHICLE TO GO INTO THE ONCOMING LANE OF TRAFFIC WHERE A LOG TRUCK WAS TRAVELING.
19 20	THE LOG TRUCK WAS ABLE TO GET ON THE SHOULDER OF THE ROAD IN TIME TO PREVENT AN ACCIDENT. AGAIN THE TRUCK HAD TO BE SLOWED TO ALMOST A COMPLETE STOP BEFORE THE SHAKING STOPPED. TRUCK WAS TAKEN TO DEALER AGAIN AND THE ONLY THING REPLACED WAS THE TRACK BAR BUSHING. THIS
<ul><li>21</li><li>22</li><li>22</li></ul>	VEHICLE IS NOT SAFE! *TR 1 Affected Product
23 24 25	November 16, 2016 NHTSA ID NUMBER: 10926570 Components: STEERING, SUSPENSION NHTSA ID Number: 10926570
26 27	Incident Date March 9, 2016 Consumer Location LAFAYETTE, LA Vehicle Identification Number 1FT7W2BT0CE**** Summary of Complaint
28	CRASHNo FIRENo -52-
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.53 Page 53 of 353
1 2 3 4 5 6 7 8 9	INJURIES0 DEATHS0 WHILE DRIVING AT SPEEDS ABOVE 50 MPH ON BOTH CITY AND HIGHWAY ROADS THE FRONT END AND STEERING WHEEL START TO WOBBLE AND VIBRATE TO A POINT WHERE CONTROL OF THE VEHICLE IS ALMOST LOST. THE ONLY WAY TO REMEDY THE WOBBLE/VIBRATION IS TO HIT THE BRAKES AND SLOW THE VEHICLE DOWN. THIS ONLY OCCURS WHEN DRIVING OVER UNEVEN PAVEMENT, POT HOLES OR WASHBOARD ROADS. MY RESEARCH HAS REVEALED THAT THIS IS A VERY COMMON PROBLEM WITH THE F250S AND IS COMMONLY REFERRED TO AS THE "DEATH WOBBLE". THE 2 DEALERS I BROUGHT IT TO EVEN AGREED THAT IT IS A COMMON PROBLEM THAT THEY HAVE BEEN DEALING WITH. THIS PROBLEMS OCCURS ALMOST EVERY HIGHWAY TRIP I TAKE. 1 Affected Product
10	
10	January 17, 2018 NHTSA ID NUMBER: 11063319 Components: STEERING
	NHTSA ID Number: 11063319
12	Incident Date January 1, 2018
13	Consumer Location ARCADIA, FL Vehicle Identification Number N/A
14	Summary of Complaint
	CRASHNo
15	FIRENo INJURIESO
16	DEATHSO
17	TL* THE CONTACT OWNS A 2012 FORD F-250. WHILE DRIVING 65 MPH, THE CONTACT DROVE IN THE MIDDLE TWO LANES TO AVOID A COLLISION WITH A VEHICLE THAT
18	HAD PULLED OVER TO THE SIDE OF THE ROAD AND OPENED THE DRIVER'S DOOR.
19	WHILE PASSING THE OTHER VEHICLE, THE CONTACT'S VEHICLE SHOOK VIOLENTLY
20	AND THE CONTACT LOST CONTROL OF THE VEHICLE. ALSO, THE BRAKE PEDAL FAILED TO OPERATE. THE CONTACT WAS ABLE TO REGAIN CONTROL OF THE VEHICLE ONCE
	THE SPEED SLOWED DOWN TO 35 MPH. THE VEHICLE WAS TAKEN TO DESOTO
21	AUTOMALL (3039 SE 70, ARCADIA, FL 34266) WHERE IT WAS DIAGNOSED THAT THE
22	FAILURE WAS CALLED THE "FORD DEATH WOBBLE". THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS ALSO CONTACTED AND DID NOT ASSIST. THE
23	FAILURE MILEAGE WAS 128,000. THE VIN WAS UNAVAILABLE.
24	1 Affected Product
25	February 10, 2014 NHTSA ID NUMBER: 10563791
26	Components: WHEELS, STEERING, SUSPENSION NHTSA ID Number: 10563791
	Incident Date February 8, 2014
27	Consumer Location Unknown
28	Vehicle Identification Number 1FT8W3BT0CE****
	Summary of Complaint
	-53- Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.54 Page 54 of 353
1 2 3 4 5 6 7 8 9 10	CRASHNO FIRENO INJURIESO DEATHSO THIS IS PROBABLY ABOUT THE 30TH TIME MY FORD F-350 HAS HAD A DEATH WOBBLE. THIS TIME I WAS DRIVING ON HIGHWAY 69 BETWEEN PRESCOTT VALLEY AND PRESCOTT WHEN IT STARTED. IT WAS SHAKING SO BAD THAT I ALMOST LOST CONTROL AND HIT THE MEDIAN. THE OTHER VEHICLES MUST HAVE NOTICED THE VEHICLE SHAKING BECAUSE ALL OF THE TRAFFIC AROUND ME BACKED WAY OFF. ONCE AGAIN I REPORTED IT TO FORD AND TOOK IT IN RIGHT AWAY. THEY TOLD ME AGAIN THAT IF IT DID NOT DO IT FOR THEM THERE WAS NOTHING THEY COULD DO FOR ME AND SENT ME HOME WITH MY VEHICLE. THIS SEEMS TO BE A PROBLEM WITH THE FORD F-350 BUT FORD REFUSES TO RECALL OR FIX IT. I FOUND TONS OF INFORMATION ONLINE ABOUT THE ISSUE AS WELL AS YOUTUBE VIDEOS TAKEN OF THE EVENTS HAPPENING. *TR 1 Affected Product
11 12 13 14 15 16 17 18 19 20 21 22	August 21, 2014 NHTSA ID NUMBER: 10627327 Components: SUSPENSION NHTSA ID Number: 10627327 Incident Date July 16, 2014 Consumer Location HOUSTON, TX Vehicle Identification Number 1FT7W2A65DE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 COMING BACK FROM A TRIP ON I-10 DRIVING HIGHWAY SPEED I HIT A SMALL POT HOLE. THE TRUCK JUMP TO THE RIGHT, ALMOST LOST IT. THIS HAS HAPPENED A NUMBER OF TIMES. SPOKE WITH DEALER, THEY STATED TO LET SOME AIR OUT OF THE TIRES. AT THIS POINT AND TIME I HAVE NOT LET ANY AIR OUT. I FEEL IT HAS SOMETHING TO DO WITH THE SUSPENSION. *TR 1 Affected Product
23 24 25 26 27 28	March 11, 2015 NHTSA ID NUMBER: 10693753 Components: STEERING, SUSPENSION NHTSA ID Number: 10693753 Incident Date January 14, 2014 Consumer Location AMARILLO, TX Vehicle Identification Number 1FT7W2BT3DE**** Summary of Complaint CRASHNo FIRENo -54- Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.55 Page 55 of 353
1 2 3 4 5 6 7	INJURIES0 DEATHS0 I WAS DRIVING DOWN HIGHWAY AT 65 MPH AND HIT BUMP IN ROAD. THE TRUCK WENT INTO A MASSIVE VIBRATION ALMOST LOST CONTROL OF VEHICLE HAD TO SLOW DOWN TO ALMOST 35 MPH VIBRATION STOPPED AND CONTINUED ON DOWN HIGHWAY! TOOK INTO FORD DEALERSHIP AND THEY SAID THAT THE TRACK BAR HAD LOOSE BUSHINGS!! THEY WANTED 1200 TO FIX SAID THAT MY WARRANTY WAS OUT ON THAT PART AT 35,000 MILES TRUCK ONLY HAS 40,000 ON IT I THINK THE VIBRATION ALSO CAUSED LEAK IN RADIATOR AND OF COURSE NO HELP FROM FORD!!!!! 1 Affected Product
<ul> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ul>	August 27, 2017 NHTSA ID NUMBER: 11019943 Components: STEERING, SUSPENSION NHTSA ID Number: 11019943 Incident Date August 24, 2017 Consumer Location LOUISVILLE, CO Vehicle Identification Number 1FT7X2B67FE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 THERE IS AN ISSUE WITH THE TRUCK LOSING STEERING WHEN ENCOUNTERING BUMPY ROADS OR MULTIPLE POTHOLES IN A ROW WHENEVER SPEED IS ABOVE 30 MPH. AT HIGHWAY SPEEDS I HAVE LITERALLY LOST CONTROL ENOUGH THAT I CROSS LANES, UNCONTROLLABLY BECAUSE I HAVE ENCOUNTERED DEFECTS IN THE ROAD SURFACE. I HAVE TRAVELED ACROSS THE SAME ROAD SURFACE IN OTHER VEHICLES AT SIMILAR SPEEDS AND HAVE NO NOTICABLE EFFECTS. THE 2015 F250 SD HAS THE SAME LOSS IN CONTROL EVERY TIME. 1 Affected Product
21 22 23 24 25 26 27 28	October 30, 2016 NHTSA ID NUMBER: 10920115 Components: ELECTRONIC STABILITY CONTROL, SUSPENSION, POWER TRAIN NHTSA ID Number: 10920115 Incident Date October 30, 2016 Consumer Location STRASBURG, OH Vehicle Identification Number 1FTBF2B65GE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I WAS DRIVING DOWN THE HIGHWAY AND ALL OF A SUDDEN TWICE WITHIN 10 MILES OF EACH OTHER MY TRUCK STARTED VIOLENTLY SHAKING ALOST SENDING ME INTO -55- Class Action Complaint Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.56 Page 56 of 353
1 2 3	ANOTHER LANE AND LOSING CONTROL. HAD TO SLOW DOWN ALMOST TO A STOP BEFORE IT WOULD QUIT. *TR 1 Affected Product
4	March 10, 2019 NUTEA ID NUMBED, 11090197
5	March 19, 2018 NHTSA ID NUMBER: 11080186 Components: ELECTRICAL SYSTEM, STEERING, SUSPENSION NHTSA ID Number: 11080186
6	Incident Date January 11, 2018
7	Consumer Location VILLA RICA, GA
7 8	Vehicle Identification Number 1FT7W2B61HE**** Summary of Complaint
9	CRASHNo
9	FIRENo INJURIES0
10	<b>DEATHSO</b> I PURCHASED MY 2017 FORD F 250 SUPER DUTY 4X4 IN SEPTEMBER OF 2017. I FIRST
11	NOTICED AN ISSUE WITH THE SUSPENSION WHEN HITTING A BUMP IN THE ROAD AT 60
12	MPH AND ALMOST LOST CONTROL OF THE TRUCK. LUCKILY I WAS ABLE TO SLOW
13	DOWN AND REGAIN CONTROL. I BEGIN TO DO SOME RESEARCH AND LEARN OF THE DEATH WOBBLE THAT FORD IS AWARE OF, I WILL NOW TAKE MY VEHICLE IN TO HAVE
14	THE SUSPENSION CHECKED. SECONDLY, I HAVE BEEN HAVING ISSUE'S WITH MY SYNC3 SYSTEM, BLUETOOTH, CLIMATE CONTROL, EASY ENTRY AND EXIT FOR THE DRIVERS
15	SEAT AND THE APPLE CAR PLAY FEATURE. AFTER TAKING MY VEHICLE TO THE SHOP, I
16	WAS TOLD THE SYNC3 SYSTEM, A COUPLE MODULES AND THE CHASSIS HARNESS WAS REPLACED TO CORRECT THE ISSUE'S. I HAVE TAKEN MY TRUCK TO FORD THREE TIME
17	FOR THE SYNC3 MALFUNCTION AND WAS TOLD NOT TO USE THE BLUETOOTH
	STREAMING WITH APPLE PRODUCTS, WHICH DOESN'T MAKE SENSE IF IT'S SUPPOSE TO
18 19	WORK. I HAVE CONTACT FORD FOR A BUY BACK AND THE ANSWER OF COURSE WAS "NO" I HAVE TO TAKE IT TO THE SHOP A FEW MORE TIMES FOR THE SAME REPAIR AND
	IT HAS ALREADY BEEN IN THE SHOP MORE FOR THE SYNC3 ISSUE THAN ANY OTHER ISSUE'S. HOPEFULLY FORD FIGURES OUT THERE ISSUE'S AND OFFER GREATER
20	CUSTOMER SUPPORT FOR A NOT SO CHEAP VEHICLE.
21	1 Affected Product
22	
23	October 10, 2018 NHTSA ID NUMBER: 11139458 Components: STEERING, SUSPENSION
24	NHTSA ID Number: 11139458
25	Incident Date October 6, 2018
26	Consumer Location MECHANICSVILLE, VA Vehicle Identification Number 1FT7W2BT5HE****
27	Summary of Complaint
	CRASHNo FIRENo
28	INJURIES0
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	Class Action Complaint
	Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.57 Page 57 of 353
1 2 3 4 5 6 7	<b>DEATHS0</b> WHILE TRAVELING AT APPROXIMATELY 40-45 MPH, WHEN I HIT A BUMP OR SERIES OF BUMPS THE FRONT END TENDS TO "JUMP" IF I'M CORNERING OR WILL BOUNCE THE FRONT END THAT EFFECTS THE STEERING OF THE TRUCK. AT HIGHWAY SPEEDS (70MPH) GOING STRAIGHT HIT A COUPLE BUMPS IN THE ROAD AND THE TRUCKS FRONT END STARTED VIOLENTLY BOUNCING TO THE POINT I HAD TO SLOW WAY DOWN TO LESS THAN 10MPH BEFORE IT SMOOTHED BACK OUT. THIS IS A VERY SCARY THING TO HAPPEN AT THOSE SPEEDS. I COULD HAVE EASILY LOST CONTROL AND CAUSED A HORRIBLE ACCIDENT. 1 Affected Product
8 9 10 11 12	November 21, 2018 NHTSA ID NUMBER: 11153165 Components: STEERING, SUSPENSION NHTSA ID Number: 11153165 Incident Date November 12, 2018 Consumer Location WALLER, TX Vehicle Identification Number 1FT7W2BT2HE**** Summary of Complaint
13 14	CRASHNo FIRENo INJURIES0
14	<b>DEATHS0</b> WHILE DRIVING ABOUT 55 MPH ON A RURAL ROAD , I HIT A WASHBOARD SPOT IN THE
16 17 18 19	ROAD . THE STEERING WHEEL STARTING OSCILLATING WILDLY . I ALMOST LOST CONTROL OF THE TRUCK AS THE FRONT END SEEMED LIKE IT WAS BOUNCING DOWN THE ROAD . I HAD TO SLOW DOWN TO ABOUT 20 MPH BEFORE THE TRUCK RECOVERED . FORTUNATELY I WAS ON A RURAL ROAD AND HAD NO SIDE BY SIDE TRAFFIC AS THAT COULD HAVE BEEN CATASTROPHIC. 1 Affected Product
20	
21	November 30, 2018 NHTSA ID NUMBER: 11155263
22	Components: SUSPENSION NHTSA ID Number: 11155263 Incident Data November 20, 2018
23	Incident Date November 30, 2018 Consumer Location HESPERIA, CA
24	Vehicle Identification Number 1FT7W2B67HE**** Summary of Complaint
25	CRASHNo FIRENo
26	INJURIES0
27 28	<b>DEATHS0</b> WHILE DRIVING AT FREEWAY SPEEDS TODAY I CROSSED A ROUGH SPOT ON THE FREEWAY. MY STEERING BEGAN TO SHAKE VIOLENTLY FROM LEFT TO RIGHT AND THE TRUCK STARTED VIOLENTLY SHAKING. IF IT HADN'T BEEN FOR LIGHT TRAFFIC
	-57- Class Action Complaint
	Case No.

¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.58 Page 58 of 353
1 2 3 4	ALLOWING ME TO MOVE OVER TO THE SHOULD QUICKLY THEN I WOULD HAVE LOST CONTROL OF THE TRUCK. IT WAS TERRIFYING. AFTER DOING A QUICK SEARCH ONLINE ABOUT THE PROBLEM I FOUND NUMEROUS WEB PAGES ADDRESSING THIS ISSUE. WHY HAS THIS NOT BEEN ADDRESSED? NO ONE IS GETTING HELP FROM FORD. SOME ONE IS GOING TO DIE. 1 Affected Product
5	
6	January 24, 2019 NHTSA ID NUMBER: 11171762
7	Components: STEERING, SUSPENSION NHTSA ID Number: 11171762
8	Incident Date January 23, 2019
9	Consumer Location APPLE VALLEY, CA Vehicle Identification Number 1FT7W2BT5HE****
-	Summary of Complaint
10	CRASHNo FIRENo
11	INJURIES0
12	DEATHS0
13	DRIVING AT 65-70 MPH ON A CONCRETE PAVED HIGHWAY. HIT A ROUGH PATCH OF PAVEMENT OR EXPANSION JOINT, AND THE FRONT END BEGAN SHAKING VIOLENTLY,
14	AS IF ONE OR BOTH OF THE FRONT TIRES HAD FLATTED. I COULD SEE THE HOOD
	SHAKING. THE STEERING WHEEL ALSO OSCILLATED SIGNIFICANTLY. I ALMOST LOST
15	CONTROL OF THE VEHICE. I LET OFF THE ACCELERATOR AND LIGHTLY BRAKED TO ABOUT 45MPH BEFORE THE SHAKING AND OSCILLATION STOPPED. FORD DOES HAVE A
16	TSB OUT ON THE ISSUE TSB 18-2268, BUT THEY ARE ONLY REPLACING PARTS THAT
17	HAVE WORN OUT, NOT THE HIDDEN ISSUE THAT IS CAUSING HEAVY DUTY SUSPENSION PARTS TO WEAR OUT SO QUICKLY.
18	1 Affected Product
19	
20	October 26, 2018 NHTSA ID NUMBER: 11142999
	Components: STEERING
21	NHTSA ID Number: 11142999
22	Incident Date October 26, 2018 Consumer Location JONESBORO, AR
23	Vehicle Identification Number 1FT7W2B68HE****
24	Summary of Complaint CRASHNo
25	FIRENo
	INJURIES0
26	<b>DEATHS0</b> FRONT END SHAKES UNCONTROLLABLY WHEN DRIVING OVER BUMPS/PITS IN THE
27	PAVED ROADWAY AT 40+ MPH. THIS DOES NOT ALWAYS OCCUR. WHEN IT DOES, I
28	MUST IMMEDIATELY BRAKE TO SLOW THE TRUCK TO 20MPH OR LESS TO REGAIN CONTROL. TODAY WAS THE WORST OCCURRENCE - COMPLETELY LOST CONTROL AND
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	Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.59 Page 59 of 353
1 2 3 4 5	SWERVED OVER BOTH ADJACENT LANES BEFORE RECOVERING. WAS TRAVELING AT 65 MPH. NO TRAFFIC NEAR, SO NO ACCIDENT OCCURRED. WHEN DRIVING OVER A BRIDGE EXPANSION JOINT, TRUCK STEERING WHEEL CANNOT BE HELD FIRM DUE TO REACTION TO THE EXPANSION JOINT AND THE STEERING. ALL THESE HAVE OCCURRED ON BOTH PAVED COUNTY ROADS, STATE HIGHWAYS, AND INTERSTATES AND DRIVING STRAIGHT AHEAD. 1 Affected Product
6 7 8	November 13, 2018 NHTSA ID NUMBER: 11151224 Components: STEERING NHTSA ID Number: 11151224 Incident Date October 27, 2018
9 10	Consumer Location GRIMESLAND, NC Vehicle Identification Number 1FT7W2B65HE**** Summary of Complaint
11 12	CRASHNo FIRENo INJURIESO DEATHSO
13 14	TL* THE CONTACT OWNS A 2017 FORD F-250. WHILE DRIVING APPROXIMATELY 70 MPH, THE VEHICLE SHOOK VIOLENTLY AND THE STEERING WHEEL TURNED RIGHT AND LEFT. THE CONTACT ALMOST LOST CONTROL OF THE VEHICLE. THERE WAS NO
15 16 17	WARNING INDICATOR ILLUMINATED. THE FAILURE RECURRED. THE VEHICLE WAS TAKEN TO DEACON JONES FORD-LINCOLN, INC. (919-736-3387, LOCATED AT 3301 MCLAIN ST, GOLDSBORO, NC 27534) WHERE IT WAS STATED THAT THE FAILURE WAS A KNOWN OCCURRENCE, BUT THERE WAS NEITHER A RECALL NOR A QUALIFIED TECHNICIAN TO REMEDY THE FAILURE. THE TECHNICIAN STATED THAT THE VEHICLE
18 19	WAS NOT MANUFACTURED BY THE DEALER. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND PROVIDED A CASE NUMBER. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS APPROXIMATELY 24,000.
20	1 Affected Product
21	November 18, 2018 NHTSA ID NUMBER: 11152254
22	Components: STEERING
23	NHTSA ID Number: 11152254 Incident Date November 17, 2018
24	Consumer Location SYRACUSE, UT Vehicle Identification Number 1FT7W2B65HE****
25	Summary of Complaint
26	CRASHNo FIRENo
27	INJURIES1 DEATHS0
28	DEATISV
	-59-
	Class Action Complaint Case No.

0	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.60 Page 60 of 353
1 2 3 4 5 6 7 8 9 10 11 12	17 NOV 2018, WIFE AND I WERE TRAVELING SB ON I-15 NEAR BOUNTIFUL, UT GOING ABOUT 70MPH WHEN I WENT OVER A BUMP (WHERE THE ROAD TURNS INTO A BRIDGE). THE VEHICLE IMMEDIATELY STARTED TO DO A DEATH WOBBLE AND WE LOST CONTROL OF THE VEHICLE. BREAKS WERE VERY SLUGGISH DUE TO THE FRONT TIRES NOT MAKING CONTACT WITH THE ROAD. WE WERE ABLE TO REGAIN CONTROL AND PULL OVER AND INSPECT THE TIRES TO FIND NOTHING WRONG. WE TOOK THE TRUCK TO LES SCHWAB WHERE THEY INFORMED US THAT WE HAVE SEVERAL LOOSE AND BROKEN PARTS. THE DEALERS WERE CLOSED OR UNABLE TO GET US IN ON SATURDAY. THE TRUCK IS A 2017 F-250 CREW CAB, 100% STOCK. IF I WAS PULLING A TRAILER, I WOULD HAVE LOST COMPLETE CONTROL AND WOULD HAVE BEEN IN AN ACCIDENT. THIS IS A MAJOR SAFETY ISSUE IF THIS TRUCK CANNOT GO DOWN A HIGHWAY WITHOUT A DEATH WOBBLE. SOMEONE OF LESSER DRIVING SKILL WILL NOT KNOW WHAT TO DO AND THIS TRUCK COULD KILL SOMEONE. VIDEO OF THE EVENT: HTTPS://WWW.YOUTUBE.COM/WATCH?V=JQFTGQKDKPG YOU CAN SEE IN THE VIDEO THAT AS SOON AS I CROSS OVER THE BRIDGE, THE TRUCK REACTS TO IT AND STARTS TO VIOLENTLY SHAKE. THE HOOD CAN CLEARLY BE SEEN VIBRATING AND THE DASH CAM RECORDS AND SAVED THE EVENT AS A CRASH. <b>1</b> Affected Product
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	December 10, 2018 NHTSA ID NUMBER: 11157283 Components: STEERING NHTSA ID Number: 11157283 Incident Date December 8, 2018 Consumer Location LITTLETON, CO Vehicle Identification Number 1FT7W2BT7HE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WHILE DRIVING ON AN INTERSTATE BETWEEN 60 & 65 MPH I HIT A BUMP AND IMMEDIATELY ENCOUNTERED A SEVERE VIBRATION FROM THE FRONT END THROUGH THE STEERING WHEEL. THE VIBRATION WAS SO SUDDEN AND VIOLENT THAT I NEARLY LOST CONTROL. I IMMEDIATELY SLOWED THE VEHICLE AND AT APPROXIMATELY 50 MPH THE VIBRATION STOPPED. I EXITED THE HIGHWAY AND STOPPED IN A PARKING LOT. I REMOVED THE WHEEL COVERS AND VERIFIED THAT THE LUG NUTS WHERE TIGHT AND THAT THE TIRES WHERE IN GOOD OPERATING CONDITION. I ALSO INSPECTED THE STEERING LINKAGE AND FOUND NOTHING WRONG. AT THIS POINT I CHALKED IT UP TO THE HIGHWAY AND WENT ABOUT MY BUSINESS. THE NEXT DAY WHILE DRIVING MY FAMILLY IT HAPPENED AGAIN. AT THIS POINT I PARKED MY TRUCK AND NOW WILL BE TAKING IT TO THE DEALERSHIP FOR TROUBLESHOOTING. I GOOGLED THE ISSUE AND THERE ARE PAGES OF COMPLAINTS/ISSUES WITH THIS SAME SCENARIO AND IS DEEMED "DEATH WOBBLE". 1 Affected Product
	60

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1	February 21, 2018 NHTSA ID NUMBER: 11074031				
2	Components: STEERING, SUSPENSION				
3	NHTSA ID Number: 11074031 Incident Date February 2, 2018				
4	Consumer Location MIDLAND, TX				
5	Vehicle Identification Number 1FT8W3BT3HE****				
6	Summary of Complaint CRASHNo				
	FIRENo				
7	INJURIES0 DEATHS0				
8	IN MOTION ON A HIGHWAY AT 70 MILES PER HOUR. THE TRUCK HIT AN UNEVEN				
9	CONDITION ON THE ROAD.THE TRUCKS STEERING CAPABILITY WAS TOTALLY LOST.THE FRONT WHEELS WERE VIOLENTLY SHAKING.THE TIRES AND WHEELS WERE				
10	SERVERLY BOUNCING.SLIGHT BRAKING MADE THE UNCONTROLLABLE CONDITION WORSE.THE VEHICLE SLOWLY LEFT THE HIGHWAY ONTO THE RIGHT AWAY.THE SPEED				
11	WAS APPROXIMATELY 50 MPH WHEN IT LEFT THE PAVED HIGHWAY.THE FRONT				
12	WHEELS WERE STILL VIOLENTLY SHAKING AND BOUNCING.AT THIS POINT STILL WITH NO STEERING THE TRUCK BEGAN TO SPIN OUT OF CONTROL.IT FINALLY ENDED UP				
13	STUCK IN A DITCH 30 TO 40 YARDS OFF THE HIGHWAY.THE SHAKING AND BOUNCING				
14	DIDN'T STOP UNTIL THE VEHICLE CAME TO A COMPLETE STOP.AFTER MUCH RESEARCH I LEANED THAT THIS MECHANICAL STEERING PROBLEM HAS BEEN A				
15	REACURING MALFUNCTION.IT HAS BEEN NAMED THE DEATH WOBBLE.HOW CAN FORD CONTINUE TO MANUFACTURE A PRODUCT WITH DOCUMENTED EXTREME SAFETY				
16	ISSUES.ITS OBVIOUS THAT FORD HAS MADE THIS EXTREMELY DANGEROUS				
17	CONDITION AN ONGOING PROCESS.IM AMAZAZED THAT WITH ALL THE PAST				
18	COMPLAINTS CONCERNING THE DEATH WOBBLE THAT ITS BECOME NOTHING MORE THAN A BAND-AID FIX.PLEASE ADDRESS AND CORRECT THIS ONGOING NEGLIGENT				
19	MANUFACTURING PROCESS THAT FORD CONTINUES. THEY KNOWINGLY CONTINUE TO				
	PLACE INNOCENT CONSUMERS INTO A LIFE OR POSSIBLE DEATH SITUATION. <b>1 Affected Product</b>				
20					
21	October 11, 2019 NHTCA ID NUMBED, 11120700				
22	October 11, 2018 NHTSA ID NUMBER: 11139700 Components: STEERING, SUSPENSION				
23	NHTSA ID Number: 11139700				
24	Incident Date October 10, 2018 Consumer Location SALEM, MO				
25	Vehicle Identification Number 1FT8W3BTXHE****				
	Summary of Complaint				
26	CRASHNo FIRENo				
27	INJURIES0				
28	DEATHS0				
	-61-				
	Class Action Complaint				
	Case No.				

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1 2 3 4 5 6 7 8 9 10 11	I OWN A 2017 FORD F-350. THIS TRUCK IS FULLY STOCK, NO MODS OF ANY KIND. NO ABUSE. MAINTENANCE IS ALWAYS ON TIME AND TIRES ARE ALWAYS ROTATED AND BALANCED EVERY 5000 MILES. IN MAY 2018, I WAS DRIVING ALONG A STRAIGHT MODERATELY BUMPY ROAD AT ABOUT 40 MILES PER HOUR AND MY TRUCK WENT INTO THE DEATH RATTLE. THE FRONT END SHOOK SO HARD I ALMOST LOST CONTROL. I HAD TO COME TO A COMPLETE STOP TO GET THE SHAKING TO STOP. THE MILEAGE WAS APPROXIMATELY 24,000 MILES. IT HASN'T HAPPENED AGAIN UNTIL YESTERDAY, 10/10/18. I WAS TRAVELING ON A NEWLY PAVED ROAD AT 30 MPH. I HIT A SLIGHT BUMP AND THE TRUCK WENT INTO THE DEATH RATTLE AGAIN. I HAD TO SLOW DOWN TO ABOUT 5 MPH TO REGAIN CONTROL OF THE VEHICLE. I HAD ABOUT 3 MILES TIL I GOT HOME. I CRAWLED AT ABOUT 15 MPH WITH NO PROBLEMS. I STOPPED AT THE STOP SIGN ABOUT 60 FEET FROM MY HOME, STARTED TO TAKE OFF AT AN EXTREME CRAWL AND IT STARTED SHAKING AGAIN. THE MILEAGE WAS APPROXIMATELY 36,036. I HAVE CHILDREN AND THIS IS DANGEROUS! MY KIDS ARE ALWAYS WITH ME AND I CAN'T RISK THEIR LIVES BECAUSE FORD HASN'T COME UP WITH A SOLUTION TO THIS PROBLEM. SOMEONE NEEDS TO MAKE FORD FIX THIS. IT IS A DESIGN FLAW, AS I HAVE COME TO FIND OUT. THIS IS GOING TO KILL SOMEONE. <b>1 Affected Product</b>
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	December 10, 2018 NHTSA ID NUMBER: 11157298 Components: STEERING, SUSPENSION NHTSA ID Number: 11157298 Incident Date December 8, 2018 Consumer Location DRIFTWOOD, TX Vehicle Identification Number 1FT7W2BT0JE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 AT 7909 MILES SINCE NEW THE VEHICLE EXHIBITED A VIOLENT OSCILLATION OF THE STEERING WHEEL COUPLED WITH ENORMOUS SHAKING IN THE FRONT SUSPENSION, INDUCED INSTANTLY AFTER CROSSING A BRIDGE TRANSITION ON AN INTERSTATE HIGHWAY AT APPROXIMATELY 65 MPH. I NEARLY LOST CONTROL OF THE VEHICLE AND WAS FORCED TO STOP THE VEHICLE ON THE ROAD SHOULDER TO GET IT TO STOP THE OSCILLATION. THE SHAKING WAS SO VIOLENT IT ALSO CRACKED THE REAR HALF OF THE DUAL PANEL SUNROOF GLASS. 1 Affected Product
26 27 28	January 16, 2019 NHTSA ID NUMBER: 11170395 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 11170395 Incident Date January 14, 2018 Consumer Location BALDWINSVILLE, NY -62-
	Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.63 Page 63 of 353
1	Vehicle Identification Number 1FT7W2B67JE**** Summary of Complaint
2	CRASHNo FIRENo
3	INJURIES0
4	<b>DEATHS0</b> AT APPROXIMATING 12161 MILES ON MY TRUCK, IT IS LESS THAN A YEAR OLD , MY
5	F250 THE VEHICLE EXHIBITED (4-5 TIMES) A VIOLENT OSCILLATING OR SHAKING OF THE ENTIRE TRUCK WHEN GOING OVER A BUMP IN THE PAVEMENT OR OVER THE
6	EXPANSION JOINT OF A BRIDGE. I HAVE NEARLY LOST CONTROL OF THE VEHICLE (4-5
7	TIMES). MY COURSE OF ACTION IS TO TAKE MY FOOT OFF OF THE GAS, SLOW DOWN, SAFELY PULL TO THE SHOULDER OF THE ROAD, SLOW DOWN TO 5MPH, AND THEN I
8 9	CAN CONTINUE ON. THE SHAKING IS SO VIOLENT I THOUGHT THE TRUCK / I WAS GOING TO FLIP OVER BECAUSE OF LACK OF STEERING.
-	1 Affected Product
10	
11	February 2, 2019 NHTSA ID NUMBER: 11173649
12	Components: STEERING, SUSPENSION NHTSA ID Number: 11173649
13	Incident Date January 31, 2019 Consumer Location JACKSONVILLE, FL
14	Vehicle Identification Number 1FT7W2B66JE****
15	Summary of Complaint CRASHNo
16	FIRENo INJURIESO
17 18	DEATHS0
	EXPERIENCED STEERING WHEEL OSCILLATION (DEATH WOBBLE) THIS HAS OCCURED WHILE DRIVING ON THE INTERSTATE AFTER DRIVING OVER AN UNEVEN PAVEMENT
19 20	AT SPEEDS OF 55, 65 AND 70MPH. THE STEERING WHEEL SHAKES VIOLENTLY AND LOST STEERING AND BRAKING CAPABILITIES DURING THE EVENT. IT STOPPED AFTER I
20	DECELERATED TO ABOUT 40MPH FORTH UNTIL I SLOWED TO APPROXIMATELY 35MPH.
21 22	FORD DOES HAVE A TSB OUT ON THE ISSUE BUT THEY ARE ONLY REPLACING PARTS THAT HAVE WORN OUT, NOT THE HIDDEN ISSUE THAT IS CAUSING HEAVY DUTY
22	SUSPENSION PARTS TO WEAR OUT SO QUICKLY. 1 Affected Product
23	
25	December 2, 2018 NHTSA ID NUMBER: 11155421
26	Components: STEERING NHTSA ID Number: 11155421
20	Incident Date November 17, 2018
28	Consumer Location MURPHYSBORO, IL Vehicle Identification Number 1FT7W2BT1JE****
_~	Summary of Complaint
	-63- Class Action Complaint
	Case No.

c	ase 3:19-cv-	01082-AJB-AHG	Document 1 353	Filed 06/10/19	PageID.64	Page 64 of
1 2 3 4 5		UMPS ON A BRID OST CONTROL UI <mark>'oduct</mark>				/IOLENTLY AND
6	3.	NHTSA Consume	r Complaints Ex	pressing Fear tha	t Death Wobb	le Will Result in
7		Loss of Life				
8	35.	The following are t	he consumer com	plaints submitted t	o NHTSA when	re the complainant
9	expressed fear	r that someone would	d be killed as a rea	sult of the Death W	obble defect:	
10		06 NHTSA ID NUN	/IBER: 10169666			
11	· ·	<b>SUSPENSION</b> Number: 10169666				
12		e September 30, 200 ocation VACAVILL				
13	Vehicle Ident	tification Number 1		*		
14	Summary of CRASHNo	Complaint				
15	FIRENo					
16	INJURIES0 DEATHS0					
17	I HAVE A 2005 F250 SUPER DUTY THAT I PURCHASED USED WITH 10K MILES ON IT. I WAS DRIVING ON THE INTESTATE BETWEEN 70 AND 75 MPH AND DROVE OVER SOME					
18	ROUGH ASPHALT IN THE FREEWAY, IT HAS BEEN THERE FOR YEARS AND IS NOT TO					
19	BAD. HOWEVER, MY NEW TRUCK BEGAN TO SHIMMY SO BAD I THOUGHT I WAS GOING TO DIE THAT DAY. <b>I HAVE BEEN A AVIATION MECHANIC FOR 18 YEARS AND I AM</b>					
20	HERE TO TELL YOU SOMETHING IS WRONG WITH THESE FORD TRUCKS. SOMEONE IS GOING TO GET KILLED WITH THIS PROBLEM SOON. I HAD TO CLEAN MY PANTS					
20		<u>O GET KILLED V</u> R THIS EXPERIEN				
	WHAT I REA	DING FORD DOE	SN'T HAVE A F	IX FOR THE PRO		
22	1 Affected Pr	ΓS A SCARY RIDE <mark>oduct</mark>	COME PAY ME	A VISIT. *JB		
23						
24	March 17, 200	08 NHTSA ID NUN	<b>IBER: 10221430</b>			
25	_ <b>_</b>	SUSPENSION, ST Mumber: 10221430	TEERING			
26		e March 16, 2008				
27		ocation ENON VAL tification Number 1	· ·	*		
28	Summary of		1 15/1215051			
			-(	54-		
	Class Action Case No.	Complaint				

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1	CRASHNo FIRENo
2	INJURIES0
3	<b>DEATHS0</b> VIOLENT SHAKING AFTER HITTING POT HOLES OR EXPANSION JOINTS ON HIGHWAYS
4	AT SPEEDS RANGING FROM 55 TO 75MPH. THE SHAKING CAUSES A COMPLETE LOSS OF
5	STEERING CONTROL AND WILL NOT STOP UNTIL SLOWING BELOW 40MPH. AFTER
_	READING SEVERAL POSTS ONLINE I SEE <u>THIS IS AN ONGOING PROBLEM WITH THESE</u> TRUCKS AND NEEDS TO BE FIXED BEFORE SOMEONE GETS KILLED. *TR
6	1 Affected Product
7	
8	March 26, 2008 NHTSA ID NUMBER: 10222348
9	Components: SUSPENSION
10	NHTSA ID Number: 10222348
11	Incident Date June 6, 2007 Consumer Location WILMINGTON, DE
	Vehicle Identification Number 1FTSW21535E****
12	Summary of Complaint CRASHNo
13	FIRENo
14	INJURIES0
15	<b>DEATHS0</b> 2005 F-250 HAS DANGEROUS SHAKE IN FRONT END OF VEHICLE, TO THE POINT OF
16	LOOSING CONTROL OF VEHICLE ON HIGHWAY. TRUCK BOUNCED OVER FOUR LANES
17	OF HIGHWAY BEFORE GAINING CONTROL OF IT. SPEED WAS ABOUT 55-60MPH. <u>IT WAS</u> EARLY IN THE MORNING AND THERE WASN'T MUCH TRAFFIC ON THE ROAD. IF IT
	HAD BEEN IN THE AFTERNOON, THERE WOULD HAVE BEEN A CRASH AND
18	<b>POSSIBLE FATALITIES.</b> I TOOK TRUCK TO DEALER, TECH STATED THEY KNEW ABOUT THE PROBLEM BUT DIDN'T KNOW HOW TO FIX IT, AND THEY WEREN'T GOING TO DO A
19	RECALL BECAUSE IT'S NOT A VERY PUBLIC PROBLEM, SO THEY THREW SOME SHIMS
20	ON IT AND SOME OTHER STUFF. TRUCK STILL HAS A CONSIDERABLE SHAKE TO THE
21	FRONT END. WE RECENTLY TOOK THE TRUCK TO A 'NON' FORD MECHANIC. THREE TIE RODS ARE BAD AND THE STABILIZER SHOCKS ARE BAD. HE STATED THIS IS BECAUSE
22	THE FRONT END IS SHAKING SO BAD IT IS WEARING OUT THE RODS/SHOCKS. THE
	TRUCK IS ONLY THREE YEARS OLD AND THIS SHOULD NOT BE HAPPENING. THE DEALER STATED THEY KNEW ABOUT THE PROBLEM. WHY IS NOTHING BEING DONE TO
	FIX THIS ISSUE? *TR
24	1 Affected Product
25	
26	May 14, 2008 NHTSA ID NUMBER: 10227804
27	
28	Incident Date May 12, 2007
-	Consumer Location HURLEY, NM
	-65-
	Case No.
26 27	FIX THIS ISSUE? *TR 1 Affected Product May 14, 2008 NHTSA ID NUMBER: 10227804 Components: SUSPENSION NHTSA ID Number: 10227804 Incident Date May 12, 2007 Consumer Location HURLEY, NM -65- Class Action Complaint

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1	Vehicle Identification Number 1FTSX21P05E****	
2	Summary of Complaint CRASHNo	
3	FIRENo	
4	INJURIES0 DEATHS0	
5	WHEN TRAVELING AT INTERSTATE HIGHWAY SPEEDS, TRAVELING OVER BRIDGE/OVERPASS EXPANSION JOINTS WILL CAUSE THE FRONT AXLE/STEERING TO	
6	SHAKE VIOLENTLY. THIS SEEMS TO SET UP SOME KIND OF WEIRD HARMONIC	
7	VIBRATION THAT THE FRONT END CANNOT RECOVER FROM. EVEN AFTER THE ROAD SMOOTHES OUT, FRONT AXLE WILL CONTINUE TO SHAKE VIOLENTLY UNTIL SPEED IS	
8	DECREASED TO ABOUT 40MPH. THIS SHAKING IS INCREDIBLY VIOLENT. A LOSS OF CONTROL IS HIGHLY POSSIBLE. TRUCK HAS BEEN TO THE DEALER TWICE AND HAD	
9	THE STEERING STABILIZER REPLACED, THIS HAS NOT FIXED THE ISSUE. DEALER HAS	
10	NOT BEEN ABLE TO DUPLICATE THE PROBLEM DUE TO THE RANDOM OCCURRENCE AND SPECIFIC ROAD CONDITIONS REQUIRED. I HAVE DRIVEN FORD TRUCKS MY	
11	ENTIRE LIFE, THIS IS NOT A NORMAL "CHARACTERISTIC OF VEHICLE". SOMETHING IS WRONG WITH THE DESIGN ON THE FRONT END OF THESE TRUCKS. MY WIFE WILL NOT	
12	DRIVE IT. <u>SOMEBODY IS GOING TO GET KILLED.</u> *TR	
13	1 Affected Product	
14		
15	August 15, 2008 NHTSA ID NUMBER: 10238374 Components: SUSPENSION	
16	NHTSA ID Number: 10238374 Incident Date August 15, 2008	
17	Consumer Location PRESCOTT VALLEY, AZ	
18	Vehicle Identification Number 1FTSW21595E**** Summary of Complaint	
19	CRASHNo	
20	FIRENo INJURIES0	
21	DEATHSO 2005 E 250 SHOPT DED 4X4 SUDED DUTY 5 4 V 8 TDUCK SHAKES OUT OF CONTROL AT	
22	2005 F-250 SHORT BED 4X4 SUPER DUTY 5.4 V-8. TRUCK SHAKES OUT OF CONTROL AT HIGH SPEED WHEN ROUGH ROADWAY IS PRESENT. HAS DONE THIS SINCE 18,000 MILES	
22	AND GETS WORSE WITH AGE. FORD REFUSES TO FIND THE PROBLEM, AS THEY ONLY DRIVE TRUCK AROUND TOWN. HAVE ASK THEM TO TAKE ONTO INTERSTATE, BUT	
23	THEY DON'T HAVE TIME ! FORD REPLACED THE DAMPER AT 34,000, HELPED, BUT DID NOT FIX! HAVE HAD MY FRONT END MAN LOOK AT FRONT END, AND HE COULD ONLY	
25	FIND SLACK IN THE STEERING GEAR BOX, BUT THAT DIDN'T FIX THE PROBLEM EITHER.	
26	THIS TRUCK IS UNSAFE AND FORD NEEDS TO STEP UP TO THE PLATE AND FIX THE ISSUE BEFORE SOMEONE GETS KILLED! THE LAST TIME IT DID IT I HAD MY 5TH	
27	WHEEL TRAILER BEHIND ME AND IT TOOK ME ACROSS 2 LANES OF TRAFFIC INTO THE	
28	MEDIAN, AND SCARED ME TO DEATH, TO THE POINT I AM SELLING THE 5TH WHEEL AND TRUCK AS IT IS JUNK, AND WILL NEVER BUY ANOTHER FORD AFTER BEING A	
	FORD MAN FOR OVER 35 YEARS. THE ONLY WAY TO STOP THE VIOLENT SHAKING IS TO	
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	Case No.	

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.67 Page 67 of 353
1 2 3	SLAM BRAKES ON AND REDUCE SPEED TO UNDER 35 MPH. I HAVE PUT UP WITH THE PROBLEM FOR SOME TIME AS THE TRUCK NOW HAS 61,000 MILES ON IT! *TR 1 Affected Product
4	September 3, 2008 NHTSA ID NUMBER: 10240851
5	Components: SUSPENSION, STEERING
6	NHTSA ID Number: 10240851 Incident Date July 16, 2008
7	Consumer Location DEL NORTE, CO
8	Vehicle Identification Number 1FTSW21P35E**** Summary of Complaint
	CRASHNo
9	FIRENo INJURIESO
10	DEATHS0
11	I OWN A 2005 SUPER DUTY POWER STROKE AND WHEN I HIT A POT HOLE OR WHEN I'M TAKING A TURN TO THE LEFT FROM 40 MPH TO 50 MPH MY TRUCK GETS THE DEATH
12	WOBBLES UNTIL I HIT THE BRAKES AND GET DOWN TO ABOUT 15-20 MPH. I DON'T
13	EVEN LIKE DRIVING IT CAUSE YOU DON'T KNOW WHEN IT'S GOING TO HAPPEN. IT'S KIND OF SAD WHEN YOU PAY SO MUCH FOR A NICE TRUCK AND YOUR AFRAID TO
14	DRIVE IT. <u>I THINK FORD NEEDS TO HAVE A RECALL ON THESE TRUCKS BEFORE</u>
15	SOMEONE GETS KILLED, IT REALLY IS THAT BAD! *TR 1 Affected Product
16	
	November 9, 2008 NHTSA ID NUMBER: 10248066 Components: SUSPENSION, STEERING
18	NHTSA ID Number: 10248066
19	Incident Date November 2, 2008 Consumer Location HARVARD, IL
20	Vehicle Identification Number 1FTSX21595E****
21	Summary of Complaint CRASHNo
22	FIRENo
23	INJURIES0
	<b>DEATHS0</b> TSB FRONT END OSCILLATION IIRC. OR AS KNOWN ON THE INTERNET AS THE DEATH
24	WOBBLE (WHICH SEEMS VERY FITTING AS THE TRUCK GOES COMPLETELY OUT OF
25	CONTROL, IT FEELS AS IF THE WHOLE FRONT END IS COMING APART!)? SEVERE SHAKING AT HIGH SPEEDS OR ON ROUGH ROADS-JUST DRIVING ALONG AND ALL OF
26	THE SUDDEN SEVERE SHAKING OCCURS SO SEVERE THAT THIS COULD CAUSE AN
27	ACCIDENT, ALMOST LIKE BOTH FRONT TIRES BLOW OUT AT THE SAME TIME, SEVERE STEERING DIFFICULTIES WHEN THIS HAPPENS, IF YOU COME TO A COMPLETE STOP
28	AND THEN TAKE OFF IT STOPS?INTERMITTENT BUT INCREDIBLY DANGEROUS! HAS
	HAPPENED 3 TIMES WITHIN THE LAST 2 WEEKS?ONCE ON A GRAVEL ROAD, ONCE ON A
	-67- Class Action Complaint
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	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.68 Page 68 of 353
1 2 3 4 5 6 7 8 9 0 1 2	ROAD WITH POTHOLES AND ONCE ON RT43 SMOOTH AS GLASS ROAD AT A SPEED OF 65MPH?THIS IS ALWAYS A SUDDEN ONSET- NO WARNING?THIS NEEDS TO BE ADDRESSED, MY CHILDREN WERE IN THE CAR WHEN WE WERE GOING ON RT43 <u>THIS</u> <u>COULD HAVE KILLED US HAD IT BEEN A TWO LANE ROAD AS WE WERE JUST</u> <u>DOING THE SPEED LIMIT OF 65MPH AND ALL OF THE SUDDEN THE FRONT END IS</u> <u>ALL OVER THE PLACE AND OUT OF CONTROL! IT WAS ALMOST IMPOSSIBLE TO</u> <u>CONTROL</u> I HAD THE BRAKES TO THE FLOORBOARD AND THE FRONT END OF THE VEHICLE WAS JUMPING ALL OVER THE ROAD, HAD THERE BEEN A CAR BESIDE US WE WOULD HAVE COLLIDED WITH THEM! THIS IS ALL OVER THE INTERNET AS THE DEATH WOBBLE BUT HAD IT NOT HAPPENED TO US WE WOULD NOT KNOW ABOUT IT! THERE SHOULD AT MINIMUM BE A WARNING THIS COULD GET PEOPLE KILLED IF IT IS NOT ADDRESSEDPLEASE, INVESTIGATE THIS ON THE F250 OURS IS A 2005 BUT I HAVE READ THAT MANY OTHERS ARE HAVING THE SAME PROBLEM! THIS IS A HAZARD! 11-2- 08 WAS THE MOST RECENT INCIDENT THE OTHER TWO TIMES HAPPENED WITHIN 2 WEEKS BEFORE! THIS IS A SCARY SITUATION, <u>IAM JUST THANKFUL THAT THERE</u> <b>WEREN'T A LOT OF OTHER CARS ON THE ROAD OR I FEAR THAT I WOULDN'T BE</b> <b>AROUND TO WRITE THIS COMPLAINTIT IS THIS SEVERENO EXAGGERATION!</b> <b>THIS NEEDS TO BE ADDRESSED!</b> *TR <b>1 Affected Product</b>
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	January 21, 2009 NHTSA ID NUMBER: 10255935 Components: SUSPENSION NHTSA ID Number: 10255935 Incident Date January 21, 2009 Consumer Location ROSEBURG, OR Vehicle Identification Number 1FTSX21585E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 SEVERE SUSPENSION AND STEERING WHEEL SHIMMY AFTER HITTING UNEVEN ROAD SURFACE, DOING ABOUT 55MPH. THE SHAKING IS SO BACK IT THROWS THINGS OUT OF THE VISOR AND STUFF OFF OF THE SEAT ON TO THE FLOOR. TODAY WAS THE SECOND TIME THIS HAS HAPPEN. THIS IS A 2005 F250SD WITH 20789 MILES ON IT AND THIS IS JUST STARTING TO DO THIS. BOTH TIMES THIS HAPPEN HAD ENOUGH ROAD SHOULDER TO PULL OVER AND STOP. IF THIS HAPPEN ON A NARROW SHOULDER FREEWAY BRIDGE OR CONCRETE BARRIER I WOULD PROBABLY HIT SOMEONE OR SOMETHING. FORD NEEDS TO DO SOMETHING ABOUT THIS BEFORE SOMEONE DIES, THEN THERE WILL BE LAW SUITS. *TR 1 Affected Product
27 28	April 15, 2009 NHTSA ID NUMBER: 10265529 Components: SUSPENSION -68-
	Class Action Complaint Case No.

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1	NHTSA ID Number: 10265529 Incident Date March 20, 2009
2	Consumer Location MANASQUAN, NJ
3	Vehicle Identification Number N/A Summary of Complaint
4	CRASHNo
5	FIRENO
6	INJURIES0 DEATHS0
_	I OWN A FORD F-250 SUPER DUTY[2005] WITH 14,000 MILES ON IT. I HAVE HIT A SERIES
7	OF SLIGHT BUMPS TRAVELING ON THE GARDEN STATE PARKWAY TRAVELING AT ABOUT 65 MPH. THE FRONT END OF THE TRUCK AND STEERING WHEEL SHOOK SO
8	VIOLENTLY, I THOUGHT THE FRONT END OF THE TRUCK AND STEERING WHEEL SHOOK SO
9	OF THE BODY. THE STEERING WHEEL SHOOK SO VIOLENTLY I COULD HARDLY HOLD
10	ON TO IT. I TOOK MY FOOT OFF THE GAS AND APPLIED THE BREAK VERY GENTLY. I MUST HAVE SLOWED DOWN TO 30 MPH BEFORE THE TRUCK BECAME UNDER CONTROL
11	AGAIN. MEANWHILE THE CAR BEHIND ME HAD TO SLAM ON HIS BREAKS DO TO MY
12	TRUCK BEING OUT OF CONTROL AND THE RAPID DE-ACCELERATION ON A MAJOR HIGHWAY. I HAD TO PULL OVER AS SOON AS I WAS ABLE TO CHECK WHAT I THOUGHT
	WOULD BE MAJOR FRONT END DAMAGE. AFTER ALL, WHAT COULD CAUSE SUCH A
13	VIOLENT REACTION. ABSOLUTELY NOTHING TO BE SEEN. MY TRUCK WAS JUST
14	SERVICED BY A FORD DEALERSHIP AS IT HAS BEEN SINCE I PURCHASED IT NEW. THIS HAS HAPPENED AT LEAST 4 TIMES TOTAL. I CANNOT STRESS TO YOU ENOUGH HOW
15	VIOLENT THIS "SHIMMY" IS. THIS IS NO SHIMMY ! THIS IS LIKE RUNNING OVER A
16	SERIES OF TELEPHONE POLES LINED UP IN THE ROAD. IT IS ALMOST IMPOSSIBLE TO HOLD ON TO THE STEERING WHEEL LET ALONE HAVE CONTROL OF THE TRUCK. <b>THIS</b>
17	IS AN EXTREMELY DANGEROUS SITUATION THAT NEEDS TO BE CORRECTED ASAP
	OR SOMEBODY IS SURE TO DIE BECAUSE OF THIS FLAW. I WOULD BE AFRAID TO
18	HAVE MY WIFE OR CHILDREN DRIVE THIS TRUCK AND HAVE THIS HAPPEN. THEIR LIVES WOULD SURELY BE IN DANGER. PLEASE DO SOMETHING TO CORRECT THIS
19	SERIOUS PROBLEM, OR GET THIS DANGEROUS TRUCK OFF THE ROAD. *TR
20	1 Affected Product
21	
22	April 17, 2009 NHTSA ID NUMBER: 10265891
23	Components: SUSPENSION, STEERING, EQUIPMENT NHTSA ID Number: 10265891
	Incident Date April 1, 2009
24	Consumer Location PUYALLUP, WA
25	Vehicle Identification Number 1FTSW21P05E**** Summary of Complaint
26	CRASHNo
27	FIRENo INJURIES0
28	DEATHSO
	-69-
	Class Action Complaint
	Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.70 Page 70 of 353
1 2 3 4 5 6 7 8 9 10 11	LOSE OF STEERING DO TO POOR DESIGN OF FORD F-250 AND F-350 SOLID FRONT AXLE WITH SPRINGS. FROM 2005 TO PRESENT. I HAVE NEW TIRES AND RIMS, BALANCED, HAD FRONT END CHECKED FOR ALIGNMENT, MY TRUCK LIKE SO MANY OTHERS ARE HAVING SEVER FRONT END SHIMMY DO TO THE POOR DESIGN ON FORD TRUCKS. I HAVE CONTACTED LEGAL ADVICE FROM THE ADVICE OF OTHER GOVERNMENT AGENCIES. THE ATTORNEY GENERALS OFFICE, BBB, AND THE CONSUMER PROTECTION AGENCY. THIS IS MY SECOND COMPLAINT ABOUT THIS MATTER, AND IM A LITTLE UPSET TO KEEP GETTING THE ONLY RESPONSE YOU AND THE FORD CO. CAN COME UP WITH, TIRE PRESSURE!!! COME ON YOU KNOW I POOR DESIGN OF THERE FRONT ENDS. I'VE SPENT THOUSANDS TO HELP DEAL WITH MATTER TO NO BETTER RESULTS. SO FROM HERE I WILL SEEK LEGAL HELP TO PROTECT MY FAMILY AND MYSELF FROM POSSIBLE SEVERE INJURY OR DEATH. I HOPE FORD MOTOR CO. WILL FIX THE PROBLEM WITH THERE FRONT ENDS OF THERE F-250 AND F-350 SD PICKUPS FROM 2005 TO PRESENT. <u>HOPE IT DOESN'T TAKE SOMEONE GETTING KILLED BEFORE FORD</u> SAYS THEY NEED TO FIX THERE TRUCKS. LIKE THEY DID WITH THERE BAD TIRE SITUATION ON FORD EXPLORER. *TR 2 Affected Products
12 13 14 15 16 17 18 19	January 2, 2010 NHTSA ID NUMBER: 10297813 Components: SUSPENSION NHTSA ID Number: 10297813 Incident Date August 20, 2009 Consumer Location SAYRE, PA Vehicle Identification Number 1FTNF215X5E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I HAVE A 2005 FORD F250 SD AND I HAVE HAD THE FRONT END SHIMMY OUT OF
<ul> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ul>	CONTROL ON ME 2 TIME. I HAVE STOCK TIRES ON IT TIRE PRESSURE IS AT MANUFACTURERS SPECS AND <u>THIS IS JUST EXTREMELY DANGEROUS SOMEONE IS</u> <u>GOING TO GET KILLED BUY THIS.</u> FORD OR SOMEONE NEEDS TO FIX THIS PROBLEM . THANK YOU TOBY LEE *TR 1 Affected Product
24 25 26 27 28	January 31, 2010 NHTSA ID NUMBER: 10303457 Components: STEERING, SUSPENSION NHTSA ID Number: 10303457 Incident Date January 2, 2009 Consumer Location RONKONKOMA, NY Vehicle Identification Number 1FTSW21P15E**** Summary of Complaint CRASHNo -70-
	Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.71 Page 71 of 353
1 2 3 4 5 6	FIRENO INJURIESO DEATHSO I CURRENTLY OWN A FORD F 250 PICKUP TRUCK, WHEN I AM DRIVING 40 TO 50 MPH MY TRUCK STARTS TO SHACK VIOLENTLY. I HAVE READ MANY FORUMS ON THIS AND MANY PEOPLE ARE HAVING THE SAME PROBLEM . WHY HAS FORD NOT RECALLED MY TRUCK TO FIX THIS PROBLEM WHEN THEY KNOW THERE IS A PROBLEM? <u>MUST</u> SOMEBODY GET HURT OR WORSE KILLED DUE TO FORDS NEGLECT OF THIS PROBLEM? *TR
7	1 Affected Product
8	
9	July 8, 2010 NHTSA ID NUMBER: 10341943 Components: SUSPENSION
10	NHTSA ID Number: 10341943
11	Incident Date July 7, 2009 Consumer Location MANASQUAN, NJ
12	Vehicle Identification Number N/A
	Summary of Complaint CRASHNo
13	FIRENo INJURIES0
14	DEATHSO
15	MY 2005 FORD F-250 PICKUP TRUCK HAS A VIOLENT FRONT END SHAKE WHEN IT HITS EVEN A NORMAL SMALL BUMP IN THE ROAD TRAVELING AT SAFE HIGHWAY SPEED.
16	THE TRUCK NOW HAS ONLY 20,000 MILES ON IT, BUT IT HAS DONE THIS SINCE IT WAS
17	BRAND NEW. IT IS DEALER MAINTAINED AND THE TIRES HAVE BEEN ROTATED AND FILLED TO CORRECT PRESSURE APROX. EVERY 5,000 MILES. FORD SAYS IT IS DUE TO
18	IMPROPER TIRE PRESSURE. HOWEVER, THEY ARE THE ONES WHO FILLED THE TIRES TO
19	THE CORRECT PRESSURE. I HAVE COMPLAINED ABOUT THIS VERY DANGEROUS SITUATION BEFORE AND HAVE BEEN GIVEN LAME EXCUSES BY BOTH THE NHTSA AND
20	FORD. PLEASE LET ME SAY THIS AGAIN. THIS IS NOT A SHAKE IN THE FRONT END.
21	THIS IS A VERY VIOLENT REACTION WHEN THE TRUCK HITS A BUMP. THE TRUCK MUST ALMOST BE BROUGHT TO A STOP IN ORDER TO STOP THE TRUCK FROM SHAKING.
22	WHEN THIS HAPPENS ON A HIGHWAY IT BECOMES VERY DANGEROUS BECAUSE THE
23	CARS FOLLOWING MUST JAM ON THEIR BRAKES IN ORDER TO STOP FROM REAR ENDING THE TRUCK. THE FRONT END SHAKES SO VIOLENTLY THAT IT IS HARD TO
24	HOLD ON TO THE STEERING WHEEL. ANYONE DRIVING ALONGSIDE OR BEHIND THE
25	TRUCK IS IN DANGER WHEN THIS OCCURS. I KNOW THERE HAS BEEN OTHER COMPLAINTS OF THE SAME THING HAPPENING WITH THE F-250. <b>THIS IS SOMETHING</b>
	THAT SHOULD NOT BE IGNORED OR TAKEN LIGHTLY. SOMEONE WILL
26	EVENTUALLY DIE OR BE SERIOUSLY INJURED DUE TO THIS DEFECT. PLEASE DO SOMETHING ABOUT THIS BEFORE IT IS TO LATE. THIS IS AS DANGEROUS AS THE
27	STICKING ACCELERATOR PROBLEM. I AM A 58 YEAR OLD MAN WITH A VERY SAFE
28	DRIVING RECORD. *TR 1 Affected Product
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	Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.72 Page 72 of 353
1	
2	
3	July 31, 2010 NHTSA ID NUMBER: 10346501 Components: SUSPENSION
	<b>NHTSA ID Number:</b> 10346501
4	Incident Date July 30, 2010
5	Consumer Location LAUDERHILL, FL Vehicle Identification Number 1FTSW21595E****
6	Summary of Complaint
7	CRASHNo
	FIRENo INJURIES0
8	DEATHS0
9	I RECENTLY PURCHASED A FORD 2005 F250 SUPER DUTY TRUCK. WHILE DRIVING ON
10	THE HIGHWAY AT 70 MPH, I HIT AN UNEVEN SPOT ON THE ROAD THAT CAUSED THE FRONT END TO WOBBLE VIOLENTLY. I FELT I COULD NOT CONTROL THE TRUCK AND
11	HAD TO APPLY THE BRAKES IMMEDIATELY. LUCKILY THERE WERE NO OTHER CARS NEARBY. WHEN THE TRUCK REACHED APPROXIMATELY 30 – 35 MPH, THE WOBBLE
12	CEASED. ON MY WAY BACK HOME, THE WOBBLE OCCURRED AGAIN. THIS TIME I WAS
13	TRAVELING AT 60 – 65 MPH AND HIT ANOTHER ROUGH SPOT ON THE ROAD. THIS IS A
	MAJOR SAFETY HAZARD THAT NEEDS TO BE RESOLVED BEFORE SOMEONE IS KULLED L DESEADCHED THE DROPLEM ON THE INTERNET AND DISCOVEDED THIS HAS
14	<b><u>KILLED.</u></b> I RESEARCHED THE PROBLEM ON THE INTERNET AND DISCOVERED THIS HAS BEEN ONGOING FOR A WHILE. THERE ARE NUMEROUS EXAMPLES FROM OTHER F250
15	AND F350 OWNERS WITH THE SAME PROBLEM THAT CAN BE FOUND ON THE INTERNET.
16	THE FORD MOTOR COMPANY IS AWARE OF THE PROBLEM AND BLAMES THE WOBBLE
17	ON UNDERFLATED TIRES. THE WOBBLE OCCURS ON PROPERLY INFLATED TIRES ALSO AS DETAILED BY OTHER TRUCK OWNERS. BUT EVEN IF THE TRUCK'S TIRES ARE
	UNDER INFLATED, A VIOLENT WOBBLE SHOULD NOT OCCUR. MANY OTHER VEHICLES
18	ARE IN USE WITH UNDER INFLATED TIRES, YOU DON'T HEAR OF A VIOLENT WOBBLE
19	AFTER ENCOUNTERING A POT HOLE OR AN UNEVEN ROAD SURFACE. *TR 1 Affected Product
20	
21	
	June 25, 2011 NHTSA ID NUMBER: 10408904 Components: SUSPENSION
22	NHTSA ID Number: 10408904
23	Incident Date June 17, 2011
24	Consumer Location HENDERSON, NV Vehicle Identification Number 1FTSW21P65E****
25	Summary of Complaint
	CRASHNo
26	FIRENo INJURIES0
27	DEATHSO
28	2005 FORD F-250 SUPER DUTY, 69,000 MILES. TRAVELING APPROX 65 MPH, HIT A SMALL
	BUMP IN THE HIGHWAY AND THE FRONT SUSPENSION STARTED TO SHAKE
	-72- Class Action Complaint
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UNCONTROLLABLY. I VERY NEVER HAPPENED BEFORE, WAS CORRECT AT THE TIME THE LUG NUTS WERE TORO DID NOT RESOLVE THE PRO ANY KNOWLEDGE OF A SIM THIS PROBLEM IS WELL DOO LINE FROM 05"-08". IT SEEMS AWARE OF THE PROBLEM, E REMEDIES. THE NHTSA ALSO THAT DEMONSTRATED THE TRUCK. I HAVE FOUND NO A <u>NEEDS TO BE ACKNOWLEI</u> *TR 1 Affected Product	BUT HAS HAPP OF THE FIRST UED TO FORD S BLEM. TALKED ILAR PROBLEM CUMENTED ANI S TO BE AN ENC BUT IT DOES AP O KNOWS OF TH IDENTICAL PRO	ENED TWICE SIN INCIDENT, THE PECS. REPLACE TO THE FORD D AFTER A FEW I FREQUENT WI GINEERING DEFE PEAR THAT FOR IE PROBLEM. I V OBLEM THAT I A PART OF THE N	ICE. THE TIRE FIRES WERE I D FRONT STE EALER AND HOURS RESEATH THE FORD CT AND FOR D HAS OFFER TEWED FOUR M EXPERIEN HTSA. <u>THIS F</u>	E PRESSURE BALANCED AND ERING DAMPER THEY DENIED ARCH ONLINE, SUPER DUTY D IS WELL ED ANY NHTSA VIDEOS CING WITH MY PROBLEM
January 10, 2012 NHTSA ID NU	J <b>MBER: 104433</b> 8	2		
Components: SUSPENSION, S NHTSA ID Number: 10443382			IYDRAULIC	
Incident Date November 28, 201	1			
Consumer Location POTTSVIL	LE, PA			
Vehicle Identification Number	1FTSW215X5E**	***		
Summary of Complaint CRASHNo				
FIRENO				
INJURIESO				
DEATHSO				
WHILE DRIVING ON PA INTE LOSS OF CONTROL WHEN TH ROAD THAT WAS UNEVEN. T SHAKE UNCONTROLLABLY VEHICLE WAS SHIFTING INT	ΗΕ FRONT SUSP ΓΗΙS CAUSED ΤΙ FOR A LONG PE	ENSION TRAVEI HE TRUCKS INTI RIOD OF TIME T	LED OVER AN ERIOR AND E O THE EXTEN	AREA OF THE XTERIOR TO NT THAT THE
RELEASING THE GAS PEDDL AND APPLYING THE BRAKE	E DID NOT IMM S SEEMED TO IN	IEDIATELY STOP	P THE SEVERI ROBLEM. MY	E VIBRATIONS ENTIRE FAMILY
AND A NON-FAMILY MEMBE FOR OUR LIVES. AFTER RES				
ANOTHER FORD OWNER AN				
(HTTP://WWW.YOUTUBE.CO				
LAYNEXT=1&LIST=PLDCA2F WOBBLE', WHEN VIEWING T				
<b>30 SEC INTO THE VIDEO AN</b>				
CORRECTED TO PREVENT				
IS KILLED OR HURT *TR				
1 Affected Product				
		70		
	-	73-		

Class Action Complaint Case No.

C	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.74 Page 74 of 353
1 2 3 4 5 6 7	May 14, 2012 NHTSA ID NUMBER: 10458496 Components: STEERING, SUSPENSION NHTSA ID Number: 10458496 Incident Date May 15, 2008 Consumer Location GARDEN GROVE, CA Vehicle Identification Number 1FTSW21P95E**** Summary of Complaint CRASHNo FIRENo INJURIES0
8 9 10	<b>DEATHSO</b> 2005 FORD F-250 SUPER DUTY, STARTED AT @ 25,000 MILES IN 2008 AND STILL HAPPENS TODAY. HAPPENS WHEN TRAVELING OVER 60 MPH, WHEN YOU HIT ANY SMALL BUMP IN THE ROAD, THE FRONT SUSPENSION STARTED TO SHAKE UNCONTROLLABLY. IT IS VERY HARD TO CONTROL THE TRUCK THIS HAPPENS ALL THE TIME ON THE ERFEWAY
10 11 12	VERY HARD TO CONTROL THE TRUCK. THIS HAPPENS ALL THE TIME ON THE FREEWAY. THE TIRE PRESSURE WAS CORRECT AT THE TIME OF THE FIRST INCIDENT, THE TIRES WERE BALANCED AND THE LUG NUTS WERE TORQUED TO FORD SPECS. TALKED TO THE FORD DEALER AND THEY DENIED ANY KNOWLEDGE OF A SIMILAR PROBLEM.
13	AFTER A FEW HOURS RESEARCH ONLINE, THIS PROBLEM IS WELL DOCUMENTED AND FREQUENT WITH THE FORD SUPER DUTY LINE FROM 05"-08". IT SEEMS TO BE AN ENGINEERING DEFECT AND FORD IS WELL AWARE OF THE PROBLEM, BUT IT DOES
14 15	APPEAR THAT FORD HAS OFFERED ANY REMEDIES. THE NHTSA ALSO KNOWS OF THE PROBLEM. I VIEWED FOUR NHTSA VIDEOS THAT DEMONSTRATED THE IDENTICAL PROBLEM THAT I AM EXPERIENCING WITH MY TRUCK. I HAVE FOUND NO ACTION ON
16 17 18	THE PART OF THE NHTSA. <u>THIS PROBLEM NEEDS TO BE ACKNOWLEDGED AND</u> <u>CORRECTED BEFORE SOMEONE IS KILLED.</u> *JS <u>1 Affected Product</u>
19 20 21	March 1, 2010 NHTSA ID NUMBER: 10315150 Components: STEERING NHTSA ID Number: 10315150
22	Incident Date February 21, 2010 Consumer Location NORTH RICHLAND HILLS, TX Vehicle Identification Number 1FTSW21P75E**** Summary of Complaint
23 24	CRASHNo FIRENo
25	INJURIES0 DEATHS0
26 27 28	I HAVE A FORD F250 SUPER DUTY. AFTER HITTING A SMALL DIP IN THE ROAD, MY STEERING COLUMN SHOOK VIOLENTLY, BACK AND FORTH. I WAS TRAVELING ONLY 30 MI PER HOUR. TOOK TO MY DEALER AND THEY SAID NOTHING WAS WRONG. PROBABLY COULD BE MY TIRES. BOUGHT NEW TIRES AND A COUPLE OF WEEKS
	LATER,, THE SAME THING HAPPENED AGAIN. IF I WAS TRAVELING ANY FASTER, I
	-74- Class Action Complaint Case No.

c	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.75 Page 75 of 353
1 2 3 4	TRULY BELIEVE I WOULD HAVE LOST CONTROL. I HAVE BEEN DRIVING FIRE APPARATUS FOR OVER 29 YEARS. AND I KNOW SOMETHING IS WRONG HERE. <u>PLEASE</u> <u>DO SOMETHING BEFORE SOMEONE IS SERIOUSLY HURT OR KILLED.</u> I DO NOT TRUST FORD. *TR 1 Affected Product
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	June 13, 2009 NHTSA ID NUMBER: 10273718 Components: SUSPENSION, STEERING NHTSA ID Number: 10273718 Incident Date June 13, 2009 Consumer Location WEST PITTSTON, PA Vehicle Identification Number 1FTNF21535E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I EXPERIENCED A SEVERE AND VIOLENT SHAKING OF THE FRONT END OF MY 2005 FORD F-250 TRUCK WHILE TRAVELING 60 MPH OVER A SLIGHT ROUGH PATCH ON A HIGHWAY. I LOST CONTROL OF MY VEHICLE AND WAS FORCED TO SWERVE OFF THE HIGHWAY. I UST CONTROL OF MY VEHICLE DIRECTLY BEHIND ME. THIS IS THE THIRD TIME I HAVE LOST CONTROL OF THE TRUCK BECAUSE OF THIS VIOLENT SHAKING IN THE LAST MONTH. I HAVE HAD THE TRUCK TO A LOCAL INSPECTION STATION AND THEY REPLACED THE STEERING STABILIZER AND DID AN ALIGNMENT. THIS DID NOT HELP. I HAVE CALLED THE FORD DEALER I PURCHASED THE TRUCK FROM AND THEY SAID THEY NEVER HEARD OF ANYONE HAVING THIS PROBLEM WITH ANY FORD TRUCK. OBVIOUSLY, THEY ARE AWARE OF THE PROBLEM. <u>LONLY HOPE</u> THERE IS A RECALL BEFORE TOO MANY PEOPLE DIE. *TR 1 Affected Product
<ol> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	October 12, 2011 NHTSA ID NUMBER: 10429550 Components: SUSPENSION NHTSA ID Number: 10429550 Incident Date October 8, 2011 Consumer Location TWINSBURG, OH Vehicle Identification Number 1FTSX21555E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 MY FORD F250 HAS A VERY DANGEROUS WOBBLE WHEN I HIT A BUMP ON THE HIGHWAY. I HAVE CHECKED THE TIRE PRESSURE AND ALL FOUR TIRES ARE FINE. AFTER DOING SOME RESEARCH I HAD FOUND THAT <u>THIS IS A ON GOING PROBLEM</u> -75- Class Action Complaint
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.76 Page 76 of 353
1 2 3 4	WITH THE FORD SD TRUCKS. SOMETHING HAS TO BE DONE OR SOMEONE IS GOING TO GET KILLED DUE TO A BAD ACCIDENT. EVERY DEALER THAT I TALK TO HAS NEVER HEARD OF THIS PROBLEM BUT YET I SEE IT POSTED ALL OVER THE INTERNET. I AM VERY UPSET AND I AM GOING TO TAKE LEGAL ACTION. *KB 1 Affected Product
5 6 7 8 9 10 11 12 13 14 15 16 17	June 2, 2014 NHTSA ID NUMBER: 10595469 Components: SUSPENSION NHTSA ID Number: 10595469 Incident Date May 29, 2014 Consumer Location VEEDERSBURG, IN Vehicle Identification Number 1FTSX21505E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 HIT A BUMP GOING ACROSS A BRIDGE ON 1-74. THE ENTIRE TRUCK BEGAN TO SHAKE VIOLENTLY FOR SEVERAL HUNDRED FEET BEFORE I REGAINED CONTROL OF THE VEHICLE. THIS IS EVIDENTLY WHAT FORD IS CALLING A "SHIMMY". I HAD ALMOST NO CONTROL OF THE VEHICLE AT THIS POINT. IF THE SHOULDER OF THE HIGHWAY WAS ANY NARROWER I WOULD NOT BE HERE TODAY. THIS HAPPENED AGAIN TWO DAYS LATER. I WAS ALMOST REAR ENDED AT A SPEED OF 60 MPH. I DON'T KNOW WHAT TO DO, I'M STILL MAKING PAYMENTS ON A TRUCK THAT IS UNSAFE TO DRIVE. <u>THIS</u> "SHIMMY " IS GOING TO GET PEOPLE KILLED., *TR 1 Affected Product
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	May 13, 2008 NHTSA ID NUMBER: 10227684 Components: SUSPENSION, STEERING NHTSA ID Number: 10227684 Incident Date May 10, 2008 Consumer Location FORT WORTH, TX Vehicle Identification Number 1FTWW31P65E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I HAVE A 2005 FORD F350 SUPER DUTY, WITH DANGEROUS FRONT END PROBLEMS. WHEN GOING AT HIGHWAY SPEEDS (55-70MPH), AND HITTING A BUMP IN THE ROAD(EVEN WORSE WHILE GOING THROUGH A SLIGHT CURVE) THE FRONT END STARTS TO SHAKE VIOLENTLY. THIS OSCILLATION IS SO STRONG, THAT IT ALMOST YANKS THE STEERING WHEEL OUT OF MY HANDS. THE ONLY THING THAT MAKES IT STOP IS TO SLOW DOWN TO ABOUT 20MPH. VERY DANGEROUS TO DO ON THE -76- Class Action Complaint Case No.

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1 2 3 4 5 6	INTERSTATE!!! AFTER DOING SOME RESEARCH AND READING SOME OF THE ONLINE FORUMS FOR FORD TRUCK OWNERS, I FIND THAT THIS IS A MAJOR PROBLEM AND ALSO A VERY COMMON ONE TO BOOT. THE MOST WORRISOME PART OF THIS PROBLEM, IS THAT IS VERY UNPREDICTABLE. SOMETIMES I CAN GO A MONTH OR SO WITH NO PROBLEMS. HOWEVER, THIS PAST WEEKEND, IT DID THIS THREE TIMES DURING A 10 MILE TRIP HOME FROM A RESTAURANT. THIS IS A MAJOR PROBLEM THAT FORD MOTOR CO. SHOULD BE RESPONSIBLE FOR CORRECTING. <b>IF SOMETHING IS NOT</b> <b>DONE SOON MANY PEOPLE COULD GET HURT, AND GOD FORBID, BE KILLED.</b> *TR <b>1 Affected Product</b>
7 8	May 28, 2009 NHTSA ID NUMBER: 10270151 Components: SUSPENSION
9	NHTSA ID Number: 10270151 Incident Date April 5, 2009
10	Consumer Location BEND, OR
11	Vehicle Identification Number 1FTWW31P95E****
12	Summary of Complaint CRASHNo
12	FIRENo
13	INJURIES0
14	<b>DEATHS0</b> THIS PROBLEM IS NOT ISOLATED TO A PARTICULAR DAY OR A PARTICULAR INCIDENT;
15	IT IS A CHRONIC PROBLEM THAT HAPPENS WHEN MY VEHICLE HITS A HOLE IN THE
16	PAVEMENT OR A HARD BUMP WHEN TRAVELING AT 50 MPH OR MORE. MY VEHICLE IS
16	A 2005 FORD F350 4X4 AND THE FRONT END BEGINS TO SHAKE VIOLENTLY AND IN MY
17	OPINION COULD CAUSE A HEAD ON COLLISION. I HAVE SPOKEN TO THE FORD DEALERSHIP AND THEY SAID THERE IS NO RECALL FOR THIS PROBLEM. THEY OFFERED
18	TO INSTALL A HEAVIER DUTY STEERING STABILIZER, WHICH WOULD COST ME 380.00,
19	WHICH THEY SAY USUALLY HELPS THIS PROBLEM. THIS IS OBVIOUSLY A DESIGN
	FLAW BY FORD, AND THEY ARE DRAGGING THEIR FEET BECAUSE THEY DON'T WANT
20	TO ADMIT THE PROBLEM OR PAY FOR THEIR MISTAKE. SOMEONE WILL SURELY BE
21	KILLED, DUE TO THIS PROBLEM, AND THE GOVERNMENT NEEDS TO TAKE STEPS TO MAKE SURE THESE TRUCKS ARE FIXED BY FORD AT FORD'S EXPENSE. THIS IS NOT JUST
22	A PROBLEM FOR MY TRUCK, BUT IS APPARENTLY AN EPIDEMIC. SOMEONE NEEDS TO
	DO THEIR JOB AND SEE THAT THIS IS CORRECTED. *TR
23	1 Affected Product
24	
25	June 7, 2007 NHTSA ID NUMBER: 10192728
	Components: STEERING
26	NHTSA ID Number: 10192728 Incident Date May 18, 2007
27	Incident Date May 18, 2007 Consumer Location Unknown
28	Vehicle Identification Number 1FTWW33P05E****
-	Summary of Complaint
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1	CRASHNo FIRENo INHURIESO
3	INJURIES0 DEATHS0
-	I HAVE A 2005 FORD F350 SUPERDUTY AND ON SEVERAL OCCASIONS I HAVE BEEN
4	DRIVING DOWN THE ROAD AND HAVE GONE OVER BLEMISHES IN THE HIGHWAY AND IT HAS CAUSED A VIOLENT SHAKING IN THE FRONT END. IT HAS GOTTEN SO BAD AT
5	POINTS THAT IT ALMOST CAUSED A SEVERE ACCIDENT WHICH MIGHT HAVE
6	INVOLVED MANY. THIS HAS HAPPENED ON MANY OCCASIONS AND I HAVE TO SLOW
7	DOWN AND STOP BEFORE IT SUBSIDES. I HAVE BEEN TO SEVERAL DEALERS AND THEY ALL SAY THAT THEY HAVE A QUICK FIX BUT NOTHING SEEMS TO WORK. EVERYTIME I
	HAVE TRIED TO FIX THE PROBLEM I HAVE PAID FOR IT OUT OF MY OWN POCKET. <u>I</u>
8	HAVE SPOEKN WITH MANY FOR SUPERDUTY OWNERS THAT HAVE HAD THIS
9	PROBLEM AND THEY ALL SAY THE SAME THING. THIS IS NOT ONLY A PROBLEM FOR THE DRIVER OF THE VEHICLE BUT ALSO FOR OTHERS ON THE ROAD AS WELL.
10	DO PEOPLE NEED TO START DYING BEFORE THERE IS A SERVICE RECALL TO FIX
11	THE PROBLEM. FORD DIDN'T START REPLACING TIRES ON TRUCKS AND SUV'S BEFORE
12	SO MANY PEOPLE DIED IN CARE CRASHES. THIS IS A SEVERE PROBLEM AND NEEDS TO BE ADDRESSED. THERE SHOULD BE NO CALL FOR PAYING FOR AND BEING
	FINANCIALLY LOCKED INTO A \$50,000 VEHICLE THAT COULD BE CONSIDERED A DEATH
13	TRAP. THIS PROBLEM EXISTS IN ALL MODELS OF THE FORD SUPERDUTY AND FORD
14	STILL PRODUCES THESE AND SELLS THEM TO CONSUMERS AND DOESN'T FIX THEM. 1 Affected Product
15	
16	
	September 23, 2009 NHTSA ID NUMBER: 10284981 Components: SUSPENSION
17	NHTSA ID Number: 10284981
18	Incident Date September 22, 2009
19	Consumer Location CLINTON, NC Vehicle Identification Number 1FTWW33P35E****
20	Summary of Complaint
	CRASHNo
21	FIRENO
22	INJURIES0 DEATHS0
23	2005 F350 DIESEL DUALLY THIS VEHICLE NEEDS TO BE RECALLED! THE LETTER THAT
24	FORD SENT TO OWNERS IS NOT ACCURATE! IT IS NOT THE TIRE PRESSURE OF THE
	VEHICLE CAUSING THE SEVERE SHAKE! MY WHOLE TRUCK SHOOK PROFUSELY! IT WAS QUITE SCARY. AT POSTED HIGHWAY SPEED LIMITS IF THERE IS A SLIGHT BUMP
25	IN ROAD YOU CAN BE SLOWING DOWN AN HIT A BUMP AND TRUCK BEGINS TO SHAKE
26	OR GOING A AROUND A CURVE ON THE HIGHWAY AT 65MPH AND IF THERE IS A BUMP
27	IN THE ROAD ON THE CURVE THE ENTIRE TRUCK SHAKES PROFUSELY. RECEIVED A LETTER FROM FORD STATING IT WAS TIRE PRESSURE BUT MY TIRE PRESSURE IS
28	PERFECT. THIS IS A DEFECT THAT NEEDS TO BE RECALLED IMMEDIATELY STEERING
20	BOX ROCKER ARM TIRE ROD SOMETHING BUT THIS TRUCK IS NOT RIGHT. <u>I HAUL A</u>
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¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.79 Page 79 of 353
1 2 3 4 5	40FT TRAILER AND IF I HAD BEEN HAULING IT I WOULD BE DEAD ALONG WITH SEVERAL OTHER CARS I WOULD WIPED OUT PLEASE GET THIS VEHICLE RECALLED FOR SAFETY OF THE CONSUMER IT IS DEFINITELY NOT THE PROBLEM THAT FORD CLAIMS AT THIS POINT. MY TRUCK NEEDS TO BE REPAIRED AT THE COST OF FORD AND THIS DEFECT NEEDS TO BE RECALLED! PLEASE TAKE THIS COMPLAINT SERIOUSLY. SOMEONE WILL BE KILLED LIKE THIS. *TR 1 Affected Product
6 7 8	November 16, 2010 NHTSA ID NUMBER: 10366399 Components: SUSPENSION, STEERING NHTSA ID Number: 10366399 Incident Date November 15, 2010
9 10	Consumer Location EUGENE, OR Vehicle Identification Number 1FTWW31PX5E**** Summary of Complaint CRASHNo
11 12	FIRENo INJURIESO DEATHSO
13 14 15	I HAVE A 2005 F350 WITH A 4 INCH LIFT. I HAVE EXPERIENCED THE "FORD DEATH WOBBLE" 4 TIMES IN THE LAST WEEK. 3 TIMES IT WAS @ ~40 MPH AND 1 TIME IT WAS AT 75. SCARED ME TO DEATH. MY BRAKES DON'T WORK WHEN IT HAPPENS AND I
15 16 17	HAVE TO COAST TO GET IT TO STOP. I HAD THE SHOCKS REPLACED (72K ON TRUCK) SO THE 1ST SHOP I WENT TO TOLD ME THAT WOULD FIX IT. NO SUCH LUCK I PICKED IT UP AND RIGHT AFTER IT DID IT AGAIN. I JUST TOOK IT TO A COMPANY WHO WANTS \$700 TO REPLACE THE PITMAN ARM AND GEAR BOX. I HAVE NOT DONE THIS YET. THEN
17 18 19	I HAD A LOCAL 4X4 GUY TELL ME THAT I NEED TO REPLACE THE STEERING STABILIZER SHOCK AND PUT A 2ND ONE ON IT. I HAVE ALREADY SPENT \$500 ON SHOCKS. THE STABILIZERS WILL BE \$150. NO ONE HAS A CLEAR ANSWER OF WHAT THE
20 21	ISSUE IS BUT THEY WANT ME TO KEEP SPENDING \$ ON TRYING TO FIGURE IT OUT. I TALKED TO FORD AND THEY SEEM TO BE LIKE I HAVE NO IDEA WHAT I AM TALKING ABOUT. THERE IS A GUY ONLINE WHO SELLS AN AFTERMARKET STABILIZER SYSTEM
21 22 23	FOR ~\$900 BUT I THINK FORD SHOULD FIX IT THIS PROBLEM SINCE ITS A DESIGN ISSUE. PLEASE HELP ME. I DON'T HAVE A LOT OF MONEY TO KEEP TROUBLESHOOTING THIS. FORD SHOULD BE HELD RESPONSIBLE. THEY SAY THERE IS NO RECALL ON THIS ISSUE BUT IF YOU GO OUT ON THE WEB, MANY OTHER OWNERS OF MY TRUCK AND THE
24	YEARS AND MODELS AROUND IT ARE DESCRIBING THE SAME ISSUE. <u>I AM SCARED TO</u> <u>DRIVE IT. THE SHAKING IS EXTREMELY VIOLENT AND I AM LUCKY THAT THE</u> TRUCK HAS BEEN ON A STRAIGHTAWAY WITH NO CARS AROUND ME EACH TIME
25 26	ITS HAPPENEDOTHERWISE I COULD HAVE FLIPPED IT AND KILLED MYSELF OR SOMEONE ELSE OR SOMEONE DEAR TO YOU PLEASE LOOK INTO THIS AND SEE THE STORIES ON THE WEB ABOUT PEOPLE WHO HAVE
27 28	INJURED THEMSELVES AND OTHERS DUE TO THIS PROBLEM. SOMETHING HAS TO BE DONE. *TR 1 Affected Product
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1	
2	September 8, 2011 NHTSA ID NUMBER: 10424388
3	Components: STEERING, SUSPENSION NHTSA ID Number: 10424388
4	Incident Date May 8, 2011
5	Consumer Location DIXON, CA
	Vehicle Identification Number 1FTWW31P85E****
6	Summary of Complaint CRASHNo
7	FIRENo
8	INJURIES0
0	DEATHS0
9	WHILE DRIVING AT HIGHWAY SPEEDS, BUMPS IN THE ROAD SURFACE CAUSE A
10	VIOLENT SHIMMY. TRUCK HAS STOCK SUSPENSION AND OEM TIRES. TIRE PRESSURE IS PER FORD SPECIFICATION (AS INDICATED ON THE DOOR PILLAR). SEEMS NTSB HAS
11	INVESTIGATED AND DETERMINED THE ISSUE IS DUE TO SUSPENSION MODIFICATIONS OR LOW TIRE PRESSURE. THIS IS NOT THE CASE WITH THIS TRUCK. ALL STOCK AND
12	DEADLY. NTSB NEEDS TO REOPEN THEIR INVESTIGATION BEFORE SOMEONE IS
13	INJURED OR KILLED. *TR 1 Affected Product
14	
15	September 9, 2007 NHTSA ID NUMBER: 10202327
16	Components: SUSPENSION NHTSA ID Number: 10202327
17	Incident Date September 9, 2007
18	Consumer Location HUNTINGTON BEACH, CA Vehicle Identification Number 1FTSW21P96E****
19	Summary of Complaint CRASHNo
20	FIRENo
21	INJURIES0 DEATHS0
22	I PURCHASED A FORD F250 FROM A DEALERSHIP, I BELIEVE AFTER DOING MY
	RESEARCH THAT THIS MODEL HAS A DEFECT IN IT AND IS TO DANGEROUS TO DRIVE. IF
23	I DRIVE OVER 45 MPH AND I HIT A POTHOLE OR A BUMP IT VIOLENTLY SHAKES TO THE
24	POINT WHERE WE FEEL WE ARE GOING TO TIP OVER. WE HAVE TO COME TO A COMPLETE STOP FOR IT TO STOP SHAKING AND WHEN YOU ARE ON A FREEWAY THAT
25	IS VERY DANGEROUS. FORD DOES NOT SEEM TO CARE ABOUT THIS ISSUE AND HAS
23	NOT BEEN ABLE TO FIX IT. I SPENT A LOT OF MONEY ON THIS VEHICLE AND AM
26	AFRAID TO PUT MY 3 CHILDREN IN THE CAR. DO I HAVE TO WAIT FOR SOMEONE TO
27	DIE FOR FORD TO HANDLE IT. I HAVE FOUND 1000'S OF PEOPLE WITH THE SAME
	PROBLEM AND WANT TO KNOW IF THERE IS ANYTHING YOU CAN DO TO HELP US FIX THIS. *JB
28	1 Affected Product
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1	
2 3	October 1, 2007 NHTSA ID NUMBER: 10204604 Components: SUSPENSION
_	NHTSA ID Number: 10204604
4	Incident Date September 30, 2007
5	Consumer Location NEWPORT NEWS, VA Vehicle Identification Number 1FTSW21516E****
6	Summary of Complaint
_	CRASHNo
7	FIRENO
8	INJURIES0 DEATHS0
9	I WAS DRIVING ON INTERSTATE AT 75 MPH WHEN I HIT A SMALL BUMP IN THE ROAD
10	WHEN MY TRUCK WENT VIOLENTLY OUT OF CONTROL UNTIL <u>I BROUGHT IT TO A</u>
10	COMPLETE STOP ALMOST CAUSING A FATAL ACCIDENT. *JB
11	1 Affected Product
12	
	July 24, 2008 NHTSA ID NUMBER: 10235638
13	Components: SUSPENSION, STEERING
14	NHTSA ID Number: 10235638
15	Incident Date June 18, 2008
15	Consumer Location BLOWING ROCK, NC Vehicle Identification Number 1FTSX21586E****
16	Summary of Complaint
17	CRASHNo
17	FIRENO
18	INJURIES0
19	DEATHS0
-	I OWN A 2006 F-250 FORD TRUCK. WHILE DRIVING ON THE INTERSTATE THE FRONT END
20	OF THE TRUCK STARTED VIOLENTLY SHAKING. I ALMOST LOST CONTROL AND COULD
21	HAVE BEEN KILLED. THIS HAPPENED YET AGAIN THE VERY SAME DAY. I TOOK MY FORD TRUCK TO THE FORD DEALERSHIP IN BOONE AND WAS TOLD THERE WAS
22	NOTHING WRONG WITH MY TRUCK. THEY CLAIMED IT WAS PROBABLY DUE TO LOW
	AIR PRESSURE IN THE TIRES. AFTER RESEARCHING THIS PROBLEM ON MY OWN I
23	DISCOVERED THAT THIS IS QUITE A COMMON PROBLEM AND MANY MANY FORD
24	TRUCK OWNERS ARE CURIOUS AS TO WHY NOTHING HAS BEEN DONE. AFTER CLEARLY TELLING THE FORD DEALERSHIP THAT I WILL NOT ACCEPT MY TRUCK BACK UNTIL IT
25	HAS BEEN FIXED, THEY REVEAL THAT THEY DO HAVE A SERVICE BULLETIN ABOUT
23	THIS PROBLEM AND REVEAL TO ME THAT FORD TOLD THEM TO CHANGE THE AIR
26	PRESSURE IN THESE TRUCKS. THIS DOES NOT CORRECT THIS DANGEROUS AND
27	POTENTIALLY LIFE THREATENING PROBLEM! THESE TRUCKS NEED TO BE RECALLED
	AND HAVE THEIR STEERING DAMPNERS REPLACED! AFTER FIVE DAYS OF ARGUING WITH THE FORD DEALERSHIP I HAVE YET TO GET MY TRUCK BACK. <b>I DEMANDED A</b>
28	LETTER STATING THAT MY FORD TRUCK WOULD BE SAFE AND THAT THEY
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1 2 3	WOULD BE LIABLE IN THE EVENT OF MY DEATH DUE TO THIS PROBLEM THAT NO ONE WILL TAKE CARE OF! I HAVE YET TO RECEIVE THEIR ANSWER. *TR 1 Affected Product
4	February 25, 2010 NHTSA ID NUMBER: 10314410
5	Components: SUSPENSION NHTSA ID Number: 10314410
6	Incident Date February 13, 2010
7	Consumer Location MORGANTON, NC
8	Vehicle Identification Number N/A Summary of Complaint
-	CRASHNo
9	FIRENo INJURIES0
10	DEATHSO
11	INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA),
12	5 U.S.C. 552(B)(6) WITHIN THE LAST YEAR AND A HALF I PURCHASED A 2006 FORD F-250, DIESEL, 4 WHEEL DRIVE TRUCK. ON 3 DIFFERENT OCCASIONS, WHILE DRIVING AT
13	INTERSTATE SPEEDS AND IMMEDIATELY AFTER HITTING A POT HOLE OR BUMP, MY
	TRUCK WENT INTO A VIOLENT FRONT END WOBBLE/CAVITATION CAUSING A SUDDEN REDUCTION OF SPEED TO ZERO FROM APPROX 70 MPH. ALL THREE TIMES IT FELT AS IF
14	THE TRUCK WAS COMING APART AND HAD TO DODGE TRAFFIC AND GET TO THE
15	SHOULDER TO INSPECT THE TRUCK. AFTER FINDING NOTHING WRONG I CONTACTED
16	OUR LOCAL DEALERSHIP TO LOOK AT THE TRUCK AND THEY TRIED DIFFERENT AIR PRESS CHANGES IN THE TIRES, AND RE-ALIGNMENT, NOTHING HAS HELPED AND THEY
17	REFUSE TO LOOK ANY FURTHER. I STARTED RESEARCHING THIS ON THE INTERNET
18	AND FOUND HUNDREDS IF NOT THOUSANDS OF FORD F-250 TRUCK OWNERS WHO ARE EXPERIENCING THE SAME PROBLEM. YOU CAN GOOGLE "FORD 250 DEATH WOBBLE"
	OR "FORD F250 VIOLENT SHAKING" AND READ FOR YOUR SELF THE STORIES OF NEAR
19	ACCIDENTS AND PROBLEMS FORD REFUSES TO RECOGNIZE IN THE DESIGN OF THESE
20	TRUCKS. HERE RECENTLY FORD MOTOR CO. HAS CAME OUT WITH A SERVICE BULLETIN WERE I HAVE TO PAY TO HAVE FORD FIX THIS PROBLEM. WHY SHOULD I
21	HAVE TO PAY \$40,000 FOR A TRUCK THAT HAS A DESIGN FLAW AND PAY FOR THE
22	FIX,OUT OF MY OWN POCKET AS WELL. <u>A RECALL NEEDS TO BE DONE ON THESE</u> TRUCKS BEFORE PEOPLE GET KILLED,WHY SHOULD SOMEONE HAVE TO DIE FIRST
23	BEFORE FORD WILL DO ANYTHING. ANY HELP YOU CAN GENERATE ON THIS WOULD
24	BE AWESOME."THIS IS NOT A TIRE PRESS PROBLEM, BUT RATHER A DESIGN FLAW."
25	YOUR REPORT SOUNDS LIKE YOU SIDE WITH MONEY INSTEAD OF CONSUMER SAFETY. [XXX] *TR
	1 Affected Product
26	
27	September 3, 2010 NHTSA ID NUMBER: 10353642
28	Components: SUSPENSION, STEERING
	NHTSA ID Number: 10353642 -82-
	Class Action Complaint
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1 2 3 4 5 6 7 8 9 10 11	Incident Date September 2, 2010 Consumer Location ROCHESTER, NY Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 FORD 2006 F250 DEATH WOBBLE. I WAS DRIVING MY TRUCK TODAY AND I HIT A LITTLE POT HOLE IN THE ROAD AND NEARLY LOST CONTROL OF MY TRUCK. THE TRUCK WAS SHAKING SO BAD I THOUGHT FOR SURE THE FRONT WHEELS WERE OFF AND WE WERE DEAD. SCARIEST THING EVER. <u>FORD NEEDS TO RECALL THIS ISSUE BEFORE IT</u> KILLS SOMEONE IF IT HASN'T ALREADY. THIS IS VERY SERIOUS WE PAY GOOD MONEY FOR THESE VEHICLES AND SHOULD NOT HAVE TO PAY OUT OF POCKET FOR THE FIX. THANK YOU VERY MUCH FOR TAKING THE TIME TO READ THIS HOPE FORD DOSE THE RIGHT THING AND RECALLS THIS ISSUE. *TR 1 Affected Product
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	October 13, 2010 NHTSA ID NUMBER: 10360390 Components: STEERING, SUSPENSION NHTSA ID Number: 10360390 Incident Date September 30, 2010 Consumer Location WEST POINT, MS Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I HAVE A 2006 FORD F-250 SUPER DUTY TRUCK. WHEN I HIT A ROUGH SPOT IN THE ROAD THE FRONT END SHAKES SO BAD YOU HAVE NO CONTROL OF THE STEERING. THE ONLY WAY TO GET IT TO STOP SHAKING IS TO GET ON THE BRAKES AND STOP. I HAVE BEEN BACK TO THE DEALER AND THEY TELL ME THERE IS NOTHING WRONG. <u>SOMEONE IS GOING TO GET KILLED IF THIS IS NOT CORRECTED.</u> *TR 1 Affected Product
23 24 25 26 27 28	July 18, 2011 NHTSA ID NUMBER: 10413448 Components: SUSPENSION NHTSA ID Number: 10413448 Incident Date July 18, 2011 Consumer Location LENEXA, KS Vehicle Identification Number N/A Summary of Complaint CRASHNo -83- Class Action Complaint Case No.

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1 2 3 4 5 6 7 8 9	FIRENO INJURIESO DEATHSO WHILE DRIVING MY FORD F-250 ON THE HIGHWAY, I HIT A MINOR BUMP IN THE ROAD. THE TRUCK IMMEDIATELY STARTED SHAKING OUT OF CONTROL. I LITERALLY HAD TO STOP IN THE MIDDLE OF THE HIGHWAY BEFORE THE SHAKING WOULD STOP. THIS IS THE 11TH TIME THAT THIS HAS HAPPENED TO ME. IT HAPPENS AT A SPEED OVER 50 MPH. LUCKILY I HAVE NEVER WRECKED THE TRUCK. I HAVE BEEN ABLE TO MAINTAIN SOME SORT OF CONTROL. I HAVE READ FORD'S REQUEST TO MAINTAIN ADEQUATE TIRE PRESSURE. I READ THAT AFTER THE FIRST TIME IT HAPPENED. IT HAS HAPPENED AN ADDITIONAL TEN TIMES. WHEN IS ENOUGH ENOUGH? <u>DOES SOMEONE HAVE TO</u> DIE BEFORE FORD REALIZES THAT THERE IS A PROBLEM? *KB 1 Affected Product
10	March 20, 2012 NHTSA ID NUMBER: 10452381 Components: STEERING, SUSPENSION
11	NHTSA ID Number: 10452381
12	Incident Date March 19, 2012
13	Consumer Location LINDEN, PA Vehicle Identification Number N/A
14	Summary of Complaint
	CRASHNo
15	FIRENo
16	INJURIES0 DEATHS0
17	THE TRUCK NOW THREE TIMES IN LESS THAN 5 MONTHS HAS SHOOK SO BAD THAT WE
	COULDN'T HOLD ONTO THE STEERING WHEEL, WHEN JUST RIDING OVER A BRIDGE
18	SEAM. THE TRUCK SHOOK SO BAD THAT THE CAR IN THE NEXT LANE RAN OFF THE
19	ROAD AND WE ENDED UP IN THE MEDIAN. WE HAVE PURCHASED NEW TIRES AND WE CHECK OUR PRESSURE DAILY. WHICH HAS NOTHING TO DO WITH THIS ISSUE.
20	SOMEONE IS GOING TO BE KILLED WITH THIS HYPER SHAKING. I KNOW IF THERE ISN'T
	SOMETHING DONE THERE ARE GOING TO BE ACCIDENTS. WE LIVE IN THE NORTHEAST
21	WHERE WE HAVE SNOW AND ICE WITH THE ROADS IN THAT CONDITION WE WOULD
22	HAVE NEVER BEEN ABLE TO CONTROL THE TRUCK IF WE WOULD HAVE BEEN ON ICE
23	AND SNOW. LUCKY IT WAS NOT SNOWING AND IT WAS DRY PAVEMENT. I KNOW IF SOMETHING ISN'T DONE ABOUT THIS AND ALL THE OTHER COMPLAINTS THAT HAVE
23	BEEN FILED FORD IS GOING TO BE SORRY WHEN SOMEONE IS KILLED. THE PROBLEM IS
24	SO BAD YOU HAVE NO CONTROL OVER THE STEERING AND HAVE NO PLACE TO GO
25	WHEN THIS HAPPENS. WE ALMOST SIDESWIPED THE CAR NEXT TO US THANK
26	GOODNESS THEY WERE PAYING ATTENTION WHEN IT HAPPENED. THEY STOPPED AND ASKED IF WE WERE OK. THEY SAID THEY NEVER SAW ANYTHING LIKE THAT BEFORE.
	WE HAVE OWNED AT LEAST 6 F-150 TRUCKS AND 4 FORD EXPLORERS SO YOU COULD
27	SAY WE ARE FORD PEOPLE. BUT I AM NOT SO SURE WE WILL STAY A FORD FAMILY
28	SINCE THEY DON'T SEEM TO WANT TO DO ANYTHING TO REMEDY THIS ISSUE AND IT IS
	HAPPENING IN THE NEW ONES ALSO. WE HAVE A FRIEND THAT HAS A 2011 AND IT
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.85 Page 85 of 353
1 2 3 4	DOES THE SAME THING. I KNOW YOU HAVE DISMISSED COMPLAINTS BEFORE <u>BUT</u> <u>SOMEONE IS GOING TO BE KILLED. THEN MAYBE SOMETHING WILL BE DONE BY</u> <u>YOU OR FORD WHEN THAT HAPPENS IT IS A SHAME THAT IT TAKES A DEATH TO</u> <u>MAKE SOMEONE DO SOMETHING.</u> *KB <u>1 Affected Product</u>
5 6 7	March 14, 2016 NHTSA ID NUMBER: 10849567 Components: SUSPENSION, STEERING NHTSA ID Number: 10849567 Incident Date March 13, 2016
8 9	Consumer Location HOUSTON, TX Vehicle Identification Number 1FTSW21PX6E**** Summary of Complaint CRASHNo
10 11	CRASHNO FIRENo INJURIESO DEATHSO
12 13	PLEASE REOPEN THIS INVESTIGATION. EVERY PERSON THAT I KNOW WITH A FORD F250 4X4 HAS THIS PROBLEM ON OCCASION. <u>YOUR FAILURE TO MAKE FORD FIX</u> <u>WILL KILL SOMEONE. HOW MANY PEOPLE HAVE TO DIE?</u> DATE INVESTIGATION
14 15	OPENED: MAR 14, 2008 DATE INVESTIGATION CLOSED: MAR 31, 2009 NHTSA ACTION NUMBER: EA08007 COMPONENT(S): SUSPENSION MY TRUCK HAS 60,000 MILES NOW AND I HAVE REPLACED ALL 4 TIRES NEARLY 3 DIFFERENT TIMES IN THE LAST 15,000 MILES. THAT'S AN AVERAGE OF TIRES LAST 5000 MILES. I HAVE ENCOUNTERED THIS
16 17	PROBLEM MANY TIMES, AND CONSTANTLY GET A "RUN-AROUND" THAT IT'S THE TIRES. MY TIRES ARE PROPERLY INFLATED. YESTERDAY, I WAS TRAVELLING ON INTERSTATE 45 YESTERDAY AT 70 MPH'S AND TRAFFIC SUDDENLY SLOWED TO A
18 19 20	CRAWL. I HAD TO APPLY MY BRAKES AGGRESSIVELY AND WHEN I HIT A CERTAIN SPEED BETWEEN 35MPH AND 60 MPH, THE TRUCK BEGAN TO RANDOMLY BOUNCE AND WAS COMPLETELY UNCONTROLLABLE. I COULDN'T EVEN STEER. I NEARLY CRASHED INTO SEVERAL VEHICLES ON THE ROAD. WHILE THE FRONT END OF THE VEHICLE WAS
<ul><li>20</li><li>21</li><li>22</li></ul>	VIOLENTLY BOUNCING (IT BOUNCED SO VIOLENTLY IT BROKE A FOLDING DOWN TV MOUNT / MOUNTED IN THE CEILING OF THE TRUCK), I HUNG ONTO THE STEERING WHEEL FOR DEAR LIFE (LIKE HANGING ONTO A BULL 8 SECONDS) AND CONTINUED TO
22 23 24	SLOW EVEN FURTHER, AND ULTIMATELY HAD TO DRIVE OFF INTO THE GRASS ELSE I WAS GOING TO CRASH. THE DEATH WOBBLE WENT AWAY WHEN I APPROACHED A COMPLETE STOP < 15MPH. IN THE SAME TRUCK, I HAVE HAD THIS DEATH WOBBLE INCIDENT HAPPEN OVER 200 TIMES SINCE OWNING THE VEHICLE. HAVE EVEN
25 26	<b>INCIDENT HAPPEN OVER 200 TIMES SINCE OWNING THE VEHICLE.</b> I HAVE EVEN HAD THIS SAME PROBLEM HAPPEN WHILE HAULING CAR'S ON CAR TRAILERS. IT IS SCARY. AFTER MARKET MFRS MAKE CLAIMS THAT IT'S DUE TO THE TRACK BAR AND BUSHINGS AND THESE KITS ARE AVAILABLE TO FIX THE ISSUE, BUT FORD AND THE
20 27 28	TSA DENIES ITS A REAL PROBLEM. BEFORE I PAY OUT THOUSANDS FOR A AFTERMARKET SUSPENSION, I EXPECT FORD TO FIX THIS, THE CORRECT WAY. 1 Affected Product
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¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.86 Page 86 of 353
1	December 18, 2006 NHTSA ID NUMBER: 10176370
2	Components: SUSPENSION
3	NHTSA ID Number: 10176370
4	Incident Date December 15, 2006 Consumer Location YONKERS, NY
	Vehicle Identification Number 1FTSW21526E****
5	Summary of Complaint
6	CRASHNo FIRENo
7	INJURIES0
8	DEATHSO
9	MY 06 FORD F -250 EXPERIENCES WHAT SEEMS TO BE NORMAL WHEEL-HOP ON THE HIGHWAY (BETWEEN 50-65 MPH) BUT THE HOP INSTANTLY TURNS INTO A "HYPER-
-	SHAKE" CAUSING COMPLETE LOSS OF CONTROL WITH THE TRUCK BOUNCING OUT OF
10	THE LANE TO WHEREVER IT WISHES TO GO UNTIL THE REAR BRAKES MANAGE TO
11	SLOW IT DOWN ENOUGH TO REGAIN CONTROL. <u>THANK GOD IT HAS NOT KILLED</u> ANYONE YET (INCLUDING ME).IT COULD HAVE VERY EASILY WENT HEAD-ON IF
12	THAT IS WHERE THE ROAD WAS HEADED. *JB
	1 Affected Product
13	
14	June 6, 2007 NHTSA ID NUMBER: 10192570
15	Components: STEERING, SUSPENSION
16	<b>NHTSA ID Number:</b> 10192570
	Incident Date June 6, 2007 Consumer Location AUBURN, AL
17	Vehicle Identification Number 1FTSX21506E****
18	Summary of Complaint
19	CRASHNo FIRENo
20	FIRENO INJURIESO
_	DEATHSO
21	I OWN A 2006 F250 4*4 AND WHILE DRIVING AT SPEEDS IN EXCESS OF 60 MPH THE
22	TRUCK SHAKES VIOLENTLY AND EVEN SWAYS FROM LANE TO LANE, WHEN ENCOUNTERING ANY ROUGH PLACE IN THE ROADWAY. THIS IS A VERY VIOLENT
23	SHAKING AND I HAVE BEEN FORTUNATE ENOUGH TO KEEP THE TRUCK FROM
24	WRECKING. THE SHAKING WILL NOT STOP UNTIL YOU HAVE SLOWN DOWN
2 <del>4</del>	DRAMATICALLY OR COME TO A STOP. FORD HAS COMMENTED THAT IT COULD BE THE AIR PRESSURE AND HAVE ORDERED A STEERING DAMPER TO TRY TO CORRECT THE
	PROBLEM. THIS TRUCK HAS DONE THIS SINCE DAY ONE AND WITH THE FACTORY
25	
	TIRES AND THE NEW TIRES THAT I HAVE ON IT NOW. THIS PROBLEM NEEDS TO BE
26	TIRES AND THE NEW TIRES THAT I HAVE ON IT NOW. <u>THIS PROBLEM NEEDS TO BE</u> <u>ADDRESSED BEFORE SOMEONE IS KILLED IN AN ACCIDENT RESULTING FROM THE</u>
25 26 27 28	TIRES AND THE NEW TIRES THAT I HAVE ON IT NOW. <u>THIS PROBLEM NEEDS TO BE</u> <u>ADDRESSED BEFORE SOMEONE IS KILLED IN AN ACCIDENT RESULTING FROM THE</u> <u>DEFECT IN DESIGN.</u>
26	TIRES AND THE NEW TIRES THAT I HAVE ON IT NOW. <u>THIS PROBLEM NEEDS TO BE</u> <u>ADDRESSED BEFORE SOMEONE IS KILLED IN AN ACCIDENT RESULTING FROM THE</u>
26 27	TIRES AND THE NEW TIRES THAT I HAVE ON IT NOW. <u>THIS PROBLEM NEEDS TO BE</u> <u>ADDRESSED BEFORE SOMEONE IS KILLED IN AN ACCIDENT RESULTING FROM THE</u> <u>DEFECT IN DESIGN.</u>

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1 2 3 4 5 6 7 8 9 10 11	August 5, 2007 NHTSA ID NUMBER: 10198529 Components: SUSPENSION NHTSA ID Number: 10198529 Incident Date August 2, 2007 Consumer Location MARSHALLTOWN, IA Vehicle Identification Number 1FTSX21546E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I HAVE A 2006 F250 THAT THE FRONT END SHAKES VIOLENTLY AFTER HITTING A HOLE OR SMALL BUMP IN THE ROAD AT 55 TO 60 MPH,THEN YOU MUST USE BOTH HANDS TO CONTROL VEHICLE AND SLOW DOWN TO UNDER 40 MPH OR LESS TO REGAIN CONTROL. <u>THIS IS AN ACCIDENT WAITING TO HAPPEN. I AM A LARGE MAN 6'2''</u> 240LBS AND MY FEAR IS THAT MY WIFE OR SOMEONE OF A SMALLER STATURE BE
12 13	DRIVING WHEN THIS HAPPENS AND RESULTS IN A FATALITY. THIS HAS HAPPENED SEVERAL TIMES THROUGHOUT A SIX MONTH PERIOD I OWNED THE TRUCK AND IS CONTINUALLY GETTING WORSE, BY THAT I MEAN EVERY DAY THIS PAST WEEK. *TR 1 Affected Product
14	
15	August 22, 2007 NHTSA ID NUMBER: 10200428 Components: SUSPENSION
16	NHTSA ID Number: 10200428
17	Incident Date February 16, 2007
18	Consumer Location HARRISON, OH Vehicle Identification Number 1FTSX21536E****
19	Summary of Complaint CRASHNo
20	FIRENo
21	INJURIES3 DEATHS0
22	MY 2006 F-250 SHAKES VIOLENTLY WHEN HITTING A POT HOLE THIS OCCURS ABOUT
23	ONCE EVERY COUPLE OF WEEKS. I HAVE TO COME TO A COMPLETE STOP FOR THE VEHICLE TO QUIT SHAKING I HAVE ALMOST BEEN REARENDED SEVERAL TIMES AND I
24	HAVE BEEN IN THE LANE ON ONCOMING TRAFFIC WITH MY 2-MONTH OLD IN THE VEHICLE BECAUSE I CAN NOT CONTROL THE VEHICLE WHEN THIS OCCURS. <b>I HAVE</b>
25	HAD SEVERAL CLOSE CALLS AND HAVE BEEN EXTREMELY LUCKY THE
	CIRCUMSTANCES HAVEN'T BEEN DIFFERENT OTHERWISE THE SITUATION COULD
26 27	OF BEEN FATAL FOR MY 2-MONTH OLD, MY HUSBAND AND MY SELF. *TR 1 Affected Product
28	
20	September 26, 2007 NHTSA ID NUMBER: 10204198
	-87- Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.88 Page 88 of 353
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Components: SUSPENSION, STEERING NHTSA ID Number: 10204198 Incident Date September 26, 2007 Consumer Location ALVARADO, TX Vehicle Identification Number 1FTSW21P56E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I OWN A 2006 F250 DIESEL TRUCK THAT SHAKES VIOLENTLY WHEN YOU HIT EVEN THE SMALLEST OF POTHOLES. IT SHAKES SO VIOLENTLY THAT YOU HAVE TO COME TO A COMPLETE STOP, REGAIN CONTROL, AND THEN RESUME DRIVING, THIS IS ESPECIALLY HAZARDOUS ON THE SMALL COUNTY ROADS WE LIVE ON, AND WHEN YOU HAVE TO COME TO A COMPLETE STOP ON THE FREEWAY, WE HAVE TRIED TO GET IT FIXED AT THE DEALERSHIP, WHERE THEY ASSURE US THAT NOTHING IS WRONG WITH THIS DANGEROUS DEATH TRAP. I REFUSE TO ALLOW MY HUSBAND AND MY SON GET INTO A VEHICLE THAT WILL SHAKE VIOLENTLY OUT OF CONTROL INTO ONCOMING TRAFFIC, INTO A DITCH, OR OFF A BRIDGE. I AM ASHAMED THAT FORD WOULD BE AWARE OF THIS ISSUE, AND NOT RECALL THIS PROBLEM VEHICLE AS THERE ARE MANY OTHERS OUT THERE WITH THE SAME PROBLEM. I AM FURIOUS THAT I SPENT \$48,000 ON A TRUCK THAT HAS 26,000 MILES ON IT AND HAS BEEN IN THE SHOP 3 TIMES TO HAVE THE SAME PROBLEM FIXED, SO IT IS COMPLETELY USELESS TO ME, NOT TO MENTION A DANGER TO MY FAMILY'S WELL BEING. WHAT IS IT GOING TO TAKE FOR FORD TO ADMIT THEIR TRUCKS ARE A HAZARD? HOW MANY PEOPLE ARE GOING TO HAVE TO DIE OR BE SEVERELY INJURED BEFORE THEY ADDRESS THIS PRESSING ISSUE??? *TR 1 Affected Product
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	October 5, 2007 NHTSA ID NUMBER: 10205071 Components: SUSPENSION NHTSA ID Number: 10205071 Incident Date October 4, 2007 Consumer Location SALT LAKE CITY, UT Vehicle Identification Number 1FTSX21556E**** Summary of Complaint CRASHNo FIRENo INJURIES1 DEATHS0 MY 2006 FORD F250 HIT A POT HOLD IN I-15 NEAR KAYSVILLE, SOUTHBOUND ON THURS. OCTOBER 4, 2007. I WAS TRAVELING AT 65 MPH IN THE MIDDLE LANE WHEN IT STARTED SHAKING VIOLENTLY AND ALL I HEARD WAS CAR TIRES SCREECHING. I THOUGHT I WAS GOING TO DIE. I WAS ABLE TO PULL THE TRUCK TO THE SHOULDER AND STOP. THIS HAS NOT BEEN THE FIRST TIME. THIS WAS THE EIGHTH TIME THIS HAS -88- Class Action Complaint Case No.

¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.89 Page 89 of 353
1 2 3 4 5 5 7	HAPPENED. THEN ABOUT TEN MINUTES LATER, ALMOST TO WORK, IT DID IT AGAIN ON I-80 WESTBOUND ALMOST TO 5600 WEST. I HAVE TAKEN IT IN TO TWO DEALERS WHO ONE, WILLEY FORD IN BOUNTIFUL, SAID THERE WAS SOME LOOSE BOLTS. THE OTHER DEALER ED KENLEY FORD IN LAYTON, SAID THERE WAS SOME BROKEN PARTS ON THE FRONT END. IT HAS SHOOK A LITTLE BUT NOW IS WORSE THAN EVER. <u>I AM AFRAID TO DRIVE THIS VEHICLE ANY MORE AS IT WILL EITHER KILL ME OR ANOTHER</u> <u>DRIVER.</u> I SUSTAINED A HEADACHE AND PULLED MUSCLE IN MY NECK AND A SORE BACK FROM YESTERDAYS INCIDENT. FORD NEEDS TO PULL THESE VEHICLES AND GET THEM REPAIRED OR REPLACED. *TR 1 Affected Product
8	October 20, 2007 NHTSA ID NUMPED, 10207350
9	October 29, 2007 NHTSA ID NUMBER: 10207350 Components: TIRES, SUSPENSION
0	NHTSA ID Number: 10207350 Incident Date October 29, 2007
1	Consumer Location CHARLOTTE, NC Vehicle Identification Number 2FTDX08W5VC****
2	Summary of Complaint
3	CRASHNo FIRENo
4	INJURIES0 DEATHS0
5	MY WIFE AND I WERE DRIVING MY 2006 F-250 SUPER DUTY ON HWY 95 WHEN MY
6	TRUCK FELT LIKE I WAS IN AN EARTHQUAKE. IT WAS THE WORST VIOLENT SHAKING I HAVE EVER FELT IN A VEHICLE. IT FELT LIKE ALL FOUR TIRES EXPLODED. SO I
7	FOUGHT MY STEERING WHEEL AND BRAKE PEDALS TO SLOW THE TRUCK DOWN TO FINALLY SKIDDED OFF OF THE SIDE OF THE ROAD, WHILE CARS ARE GOING BY US 70
8	PLUS MILE PER HOUR, EVERYTHING INSIDE THE VEHICLE FELL OFF OF THE SEATS THE
9	DRINKS IN THE CUP HOLDERS WENT FLYING. AFTER SEEING THAT ALL FOUR TIRES SEEMED FINE AND THAT WE DID NOT HIT ANYTHING ON THE ROAD, WE WERE SCARED
0	TO DEATH TO DRIVE AGAIN. AFTER VISITED THE FORD DEALERSHIP THE NEXT DAY, THEY ARE STILL TRYING TO FIGURE OUT WHAT IS WRONG WITH THE VEHICLE, THEY
1	SAID IT WAS THE TIRE BALANCE AND PRESSURE, BUT THERE IS NO WAY THIS WOULD
2	CAUSE SUCH A VIOLENT DEATH SHAKING EXPERIENCE. AFTER DOING MY OWN RESEARCH, IT SEEMS THERE ARE THOUSANDS OF PEOPLE WITH THE FORD SUPER DUTY
3	THAT ARE HAVING THIS SAME WORD FOR WORD PROBLEM. PLEASE HELP ME,
4	BEFORE SOMEONE IS KILLED BY THIS FORD MISTAKE. I AM SCARED TO DEATH TO DRIVE MY BRAND NEW VEHICLE. THANK YOU VERY MUCH. *TR
5	<b>DRIVE MY BRAND NEW VEHICLE</b> . THANK YOU VERY MUCH. *TR <b>1 Affected Product</b>
6	November 5, 2007 NHTSA ID NUMBER: 10208006
7	Components: SUSPENSION
8	NHTSA ID Number: 10208006 Incident Date November 5, 2007
	-89-
	Class Action Complaint
	Case No.

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.90 Page 90 of 353
1	Consumer Location PATASKALA, OH
2	Vehicle Identification Number N/A
2	Summary of Complaint CRASHNo
4	FIRENo INJURIESO
5	<b>DEATHSO</b> WHILE DRIVING HOME FROM WORK, I HIT A SMALL BUMP IN THE FREEWAY AT 65MPH
6	AND NEARLY LOST CONTROL OF MY 2006 F-250. THE VEHICLE BEGAN TO SHAKE
7	UNCONTROLLABLY AND VIOLENTLY. I TRIED TO REGAIN CONTROL OF MY DIRECTION WHICH ONLY HAPPENED AFTER I GOT BELOW 15 MPH. AFTER PULLING OFF THE
8	HIGHWAY, I GOT OUT TO CHECK WHICH TIRE HAD BLOWN AND TO MY SURPRISE ALL WERE FINE. IF I HADN'T HAVE BEEN IN THE FAR RIGHT HAND LANE OF THE FREEWAY, I
9	WOULD HAVE CAUSED AN ACCIDENT AND HURT EITHER MYSELF OR SOMEONE ELSE.
10	THIS WAS NOT A TYPICAL VEHICLE RESPONSE AND WAS VERY LITERALLY A VIOLENT WHEEL HOP OR FRONT END SUSPENSION MALFUNCTION. I CONSIDER THIS TO BE A
11	SERIOUS AND DANGEROUS ISSUE FOR F-250 OWNERS AND ALL WHO TRAVEL AROUND
12	THEM. <u>FORD NEEDS TO RE-CALL THESE FRONT END DEFECTS BEFORE SOMEONE</u> <u>GETS KILLED.</u> AFTER A THOROUGH SEARCH OF THE INTERNET, I DISCOVERED A
13	MOUNTAIN OF OTHER F-250 OWNERS WHO WERE AND ARE EXPERIENCING THE SAME PROBLEM WITH SIMILAR RESULTS, MOST CLAIMING THE SAME THING, THESE
14	VEHICLES HAVE A MAJOR LEAGUE PROBLEM WITH THE FRONT END SUSPENSION
15	WHICH WILL UNDOUBTEDLY COST SOMEONE THEIR LIFE SOMEDAY. WHAT IS THE NHTSA DOING TO BRING FORD TO THE TABLE AND GET THIS FIXED? IT'S TIME. *TR
16	1 Affected Product
17	
18	February 14, 2008 NHTSA ID NUMBER: 10218089 Components: SUSPENSION
19	NHTSA ID Number: 10218089
	Incident Date February 13, 2008 Consumer Location PRIOR LAKE, MN
20	Vehicle Identification Number 1FTSW21596E****
21	Summary of Complaint CRASHNo
22	FIRENo
23	INJURIES0 DEATHS0
24	THERE EXISTS A FACTORY FAULT IN THE FORD SUPERDUTY TRUCK. THERE IS WHAT IS CALLED A DEATH WOBBLE THAT OCCURS ON ROUGHER ROADS WHEN TRAVELING 60
25	MILES PER HOUR OR UNDER. THE FRONT END WILL SHAKE VIOLENTLY AND
26	UNCONTROLLABLY WHEN A BUMP IS HIT. I HAVE HAD IT IN TO FORD DEALERSHIPS 7+ TIMES FOR THIS AND THEY WILL NOT FIX OR REPLACE THE FAULTY PARTS. I HAVE
27	STARTED A WEB LOG ON AOL REGARDING THIS AND AM ATTACHING THE LINK .
28	HTTP://WWW.TOPIX.NET/FORUM/AUTOS/FORD-F-250-SUPER- DUTY/T0SGDCTMOBHE5JER1 THERE ARE OVER 170 SIMILAR COMPLAINTS REGARDING
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1 2 3	THE SAME PROBLEM. <u>FORD DENIES THE PROBLEM EXISTS. IT WILL KILL SOMEONE</u> <u>SOON,</u> IT HAS ALMOST CASED 4 ACCIDENTS WITH MY TRUCK. *TR 1 Affected Product
3	
4	June 6, 2008 NHTSA ID NUMBER: 10230092 Components: SUSPENSION
C	NHTSA ID Number: 10230092
6	Incident Date May 19, 2008 Consumer Location COLLEGEVILLE, PA
7	Vehicle Identification Number 1FTSX21596E****
8	Summary of Complaint CRASHNo
9	FIRENO
10	INJURIESO DEATHSO SINCE NEW THE TRUCK HAS EXPEDIENCED VIOLENT AND UNCONTROL LADLE EDONT
11	SINCE NEW THE TRUCK HAS EXPERIENCED VIOLENT AND UNCONTROLLABLE FRONT SUSPENSION SHAKING/BOUNCING/WOBBLING AFTER HITTING A SHARP BUMP AT
12	HIGHWAY SPEEDS. INITIALLY, THE SHAKING WOULD ONLY LAST APPROXIMATELY 3
13	SECONDS, BUT RECENTLY THE SHAKING WAS SO SEVERE THAT I HAD TO SLOW THE
14	VEHICLE TO 30-35 MPH BEFORE IT STOPPED. THE SHAKING WAS SO VIOLENT THAT I WAS CONVINCED THAT SOMETHING HAD BROKEN IN THE FRONT SUSPENSION, AND I
15	IMMEDIATELY INSPECTED THE FRONT SUSPENSION AT THE NEXT EXIT. NOTHING OBVIOUSLY BROKEN WAS EVIDENT. I SEARCHED THE INTERNET AND DISCOVERED
16	THAT THIS IS A COMMON AND DANGEROUS PROBLEM WITH THESE TRUCKS. I DROPPED
	THE TRUCK OFF AT THE DEALER. THEY ACKNOWLEDGED THEIR AWARENESS OF THE PROBLEM, BUT CLAIMED THEY WERE UNABLE TO DUPLICATE IT DURING THEIR ROAD
17	TEST. THIS IS NOT SURPRISING, AS IT TYPICALLY ONLY OCCURS WHEN YOU HIT A
18	SHARP BUMP OR SERIES OF BUMPS AT HIGHWAY SPEEDS. THEY PERFORMED SOME OF THE REPAIRS/ADJUSTMENTS SPECIFIED BY FORD'S TSB 07-10-10, BUT THE PROBLEM
19 20	PERSISTS. THERE IS A SERIOUS AND DANGEROUS PROBLEM WITH A LARGE POPULATION OF FORD TRUCKS THAT MUST BE ADDRESSED BY FORD AT THIS POINT, I
	HOPE THAT NHTSA CAN CONVINCE FORD TO CORRECT THE PROBLEM BEFORE
21	SOMEONE IS NEEDLESSLY KILLED. *TR
22	1 Affected Product
23	
24	August 4, 2008 NHTSA ID NUMBER: 10236933 Components: SUSPENSION
25	NHTSA ID Number: 10236933
26	Incident Date August 2, 2008 Consumer Location SELBYVILLE, DE
27	Vehicle Identification Number 1FTSW21516E****
	Summary of Complaint
28	CRASHNo FIRENo
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	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.92 Page 9 353	)2 of
1	1 INJURIES0	
2	DEATHSO	
3	MODIFICATIONS TO THIS TRUCK SINCE PURCHASING IT ON12/07/2006. ON THREE	
4	DIFFERENT OCCASSIONS MY TRUCK HAS BEGUN TO SHAKE VIOLENTLY WHILE TRAVELING DOWN 195 SOUTH IN MARYLAND TO VISIT FAMILY. THE FIRST TWO	
5	THIS HAPPENED AFTER MAKING SURE I HAD CONTROL OF THE TRUCK I PUT IT	IN
6	$_{5}$ SEEMED FINE. I HAD IT CHECKED AFTER THE SECOND TIME AND NOTHING WAS	S FOUND
7	TO BE WRONG. THE FIRST TIME THAT THIS ALL HAPPENED THERE WAS NO BUN THE ROAD OR ANYTHING, THE SECOND TIME I CROSSED A SMALL BRIDGE/OVE	
8	AND AS I WAS COMING OFF THE VIOLENT SHAKING STARTED AND MY 5 AND 7	YEAR
9	OLDS THOUGHT I WAS PLAYING, I WAS SCARED BUT HELD ON AND TOLD THEM THE SAME. I SHUT THE TRUCK DOWN LIKE THE FIRST TIME AND IT WENT AWA	
10	AGAIN. MIND YOU NOW THIS IS ALL HAPPENING WHILE DRIVING DOWN INTERS	
11	POWER STEERING AND POWER BRAKES WHILE THE TRUCK IS SHUT DOWN ROL	
12	MPH. IS THIS NOT A SAFETY ISSUE, CAN ANYONE SAY RECALL BEFORE PEOP    I TOOK THE TRUCK TO MY LOCAL FORD WHEN I GOT BACK TO HAVE IT CHECK	
13	THEY CHECKED, FOUND NOTHING AND WAS TOLD TO BRING IT BACK IF IT HAP	PENED
13	AGAIN(3RD TIME) ON 8/2/2008, ONCE AGAIN ON 195. MY WIFE AND I WERE DRIVI	NG AS
15		
16	ON THE WHEEL TO SEE WHAT WAS GOING TO HAPPEN(MECHANIC AND I DISCU DOING THIS TO SEE IF A CODE, CHECK ENGINE LIGHT OR SOMETHING BROKE. A	
17	ABOUT 20-30 SECONDS OF RIDING THIS THING OUT IT ALL STOPPED AND WENT	AWAY
18	AS QUICKLY AND WITH OUT WARNING LIKE IT STARTS. I AM CURRENTLY TRYI GET ANYONE FROM FORD TO ACKNOWLEDGE THIS PROBLEM EXSISTS, WITH LI	
19	UUCK. *TR 1 Affected Product	
20		
20		
21	Components: SUSPENSION, STEERING	
23	NHTSA ID Number: 10241663	
23 24	Consumer Location YUCAIPA, CA	
25	5 Summary of Complaint	
26	CRASHNo	
27	INJURIES0	
28		CK NEW
20	I HAVE HAD MAJOR WOBBLE. YESTERDAY ON THE INTERSTATE I WAS DRIVING	
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1 2 3 4	FAMILY BACK FROM DISNEYLAND AND HIT A POTHOLE AROUND 70MPH. THE TRUCK SHOOK OUT OF CONTROL IT WAS ALL I COULD DO TO GET THE TRUCK TO THE SHOULDER. I HAVE TAKEN THE TRUCK IN SEVERAL TIMES AND HAVE BEEN TOLD NO PROBLEMS. <u>PLEASE DO SOMETHING BEFORE SOMEONE GETS KILLED.</u> *TR 1 Affected Product
5	October 26, 2008 NHTSA ID NUMBER: 10246747
6 7	Components: SUSPENSION NHTSA ID Number: 10246747
8	Incident Date January 10, 2006 Consumer Location MABANK, TX Vehicle Identification Number N/A
9	Summary of Complaint
10	CRASHNo FIRENo
11	INJURIES0
12	<b>DEATHS0</b> I CURRENTLY DRIVE 84 TOYOTA PICKUP BECAUSE I AM TERRIFIED TO DRIVE MY 06
13	F250 4X4 SD. IF YOU ARE DRIVING ABOVE 60 MPH AND HIT THE SMALLEST BUMP IN THE
13	ROAD, IT WILL BEGIN TO SHAKE SO HARD IT WILL CAUSE YOU TO CHANGE LANES AND YOU CANNOT CONTROL THE VEHICLE UNTIL YOU STOP HARD WITH THE BRAKES. MY
14	FAMILY IS NOT ALLOWED TO RIDE IN THIS VEHICLE NO MATTER WHAT. THE DEALER
	STATES THAT IT IS THE DAMPENER AND TIRE PRESSURE. OBVIOUSLY THEY DON'T UNDERSTAND WHAT VIOLENT SHAKING ISIT IS NOT THE DAMPENER AND TIRE
16	PRESSURETHE TRUCK WILL LITERALLY BOUNCE OUT OF ITS LANE OR OFF THE ROAD. IF FORD DOES NOT RESOLVE THIS PROBLEM, <b>I AM SURE THAT MANY PEOPLE</b>
17	WILL DIE WHILE DRIVING THESE. I BOUGHT THIS TRUCK BRAND NEW AND REFUSE
18	TO DRIVE ITGUESS YOU GOT YOUR MONEY THOUGH, DIDN'T YOU FORD. *TR 1 Affected Product
19	
20	December 31, 2008 NHTSA ID NUMBER: 10253393
21	Components: SUSPENSION
22	NHTSA ID Number: 10253393 Incident Date September 20, 2007
23	Consumer Location LAUREL, MD
24	Vehicle Identification Number 1FTSX215X6E**** Summary of Complaint
25	CRASHNo
26	FIRENo INJURIESO
27	DEATHS0
28	THIS IS A SUSPENSION PROBLEM THAT I NOTICED ABOUT 9 MONTHS AFTER I BOUGHT THE VEH., (2006 FORD F-250SD). THE PROBLEM IS IN THE SUSPENSION. IT SEEMS TO
	ONLY HAPPEN WHEN YOU GO OVER AN AREA OF THE ROAD THAT IS ROUGH. IT HAS -93-
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	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.94 Page 94 of 353
1 2 3 4 5 6 7 8 9	GOTTEN PROGRESSIVELY WORSE. I WAS DRIVING AT 60 MPH AND WENT OVER A BUMPY AREA ON THE HIGHWAY AND I ALMOST LOST CONTROL OF THE TRUCK. IT PULLED HARD TO THE LEFT AND BEGAN SHAKING HEAVILY. IF I HAD NOT BEEN HOLDING THE WHEEL FIRMLY I WOULD HAVE CROSSED THE DOUBLE YELLOW LINE INTO ONCOMING TRAFFIC. I FOUND A SITE WHERE THERE WERE 11 OTHER COMPLAINTS ON THIS SAME VEH. AND THE SAME PROBLEM. I HAVE OWNED F250'S INCLUDING MY LAST THAT WAS A 2002 AND I NEVER HAD A PROBLEM LIKE THIS. ITS APPARENT THAT THERE IS SOMETHING WRONG WITH THE SUSPENSION SYSTEM THEY USED. IF SOMEONE IS DRIVING THAT HASN'T EXPERIENCED IT THEY MAY LOOSE COMPLETE CONTROL OF THE VEHICLE AND CAUSE A FATALITY. I AM GOING TO TAKE IT TO A FORD DEALER TO LOOK AT, BUT FROM WHAT I READ OF THE OTHER COMPLAINTS SOME PEOPLE HAVE BEEN IN 3-4 TIMES AND STILL HAVE THE SAME PROBLEM. *TR 1 Affected Product
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> </ol>	April 13, 2009 NHTSA ID NUMBER: 10265123 Components: STEERING, STRUCTURE, SUSPENSION, WHEELS NHTSA ID Number: 10265123 Incident Date April 12, 2009 Consumer Location PITTSBURGH, PA Vehicle Identification Number 1FTNF21576E**** Summary of Complaint
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	CRASHNO FIRENO INJURIESO DEATHSO MY F-250 SUPER DUTY, HAS A SEVERE FRONT END SHIMMY AT HIGHWAY SPEED. <u>MY</u> <u>WIFE AND I COULD HAVE DIED IN ONE INSTANCE, WE HAD TO MOVE ACROSS TWO</u> <u>LANES TO THE SHOULDER AS THE TRUCK BOUNCED UNCONTROLLABLY. I</u> <u>THOUGHT THE TIE RODS WERE GOING TO SNAP. THIS DID NOT HAPPEN JUST</u> <u>ONCE, BUT NUMEROUS TIMES.</u> EVERY TIME I APPROACH A BRIDGE DECK, BUMP OR POT HOLE I'M AFRAID THE TUCK MAY HAVE A UNCONTROLLABLE SHIMMY AND LOSING CONTROL! YOU NEVER KNOW IF THE TRUCK WILL HAVE A SLIGHT, OR SEVERE SHIMMY, SOMETIMES THERE IS NO SHIMMY AT ALL. THIS IS A PROBLEM THAT HAS TO BE RECTIFIED!!! JUST SO YOU ARE MADE AWARE MY TIRES ARE FINE AS IS MY SPEED. *TR
<ul> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ul>	1 Affected Product October 1, 2009 NHTSA ID NUMBER: 10285983 Components: SUSPENSION NHTSA ID Number: 10285983 Incident Date September 10, 2009 Consumer Location STANLEY, NM Vehicle Identification Number N/A
	-94- Class Action Complaint Case No.

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1 2	Summary of Complaint CRASHNo FIRENo
3	INJURIES0
4	DEATHSO WHEN I HIT A BUMP IN THE ROAD MY 2006 F250 4X4 STARTS SHAKING LIKE A TIRE IS
5	FALLING OFF. I REPLACED THE STEERING STABILIZER AND SHOCKS WHICH FIXED IT
6	FOR 20, 000 MILES BUT NOW IT IS BACK TO SHAKING. IT IS TO THE POINT THAT I HAVE TO BORROW MY DADS TRUCK IF I NEED ONE TO HAUL BECAUSE <u>I AM AFRAID THAT</u>
7	MY TRUCK IS GOING TO GO OFF THE ROAD OR IN ANOTHER LANE. IT JUST SITS BECAUSE I DON'T WANT TO KILL MYSELF OR SOMEONE ELSE AND I DON'T WANT
8	TO SELL IT LIKE IT IS. *TR 1 Affected Product
9	
10	October 7, 2009 NHTSA ID NUMBER: 10286629
11	Components: SUSPENSION NHTSA ID Number: 10286629
12	Incident Date October 6, 2009
13	Consumer Location NORTH PORT, FL Vehicle Identification Number 1FTSW21P36E****
14	Summary of Complaint
15	CRASHNo FIRENo
16	INJURIES0
17	<b>DEATHS0</b> 1. I OWN A 2006 FORD F250 SUPER DUTY TRUCK AND WHEN I HIT THE SMALLEST POT
18	HOLE OR BUMP IN THE ROAD MY TUCK SHAKES VIOLENTLY TO THE POINT OF LOSING
10	CONTROL. THE ONLY WAY TO STOP THE VIOLENT SHAKING IS TO COME TO A COMPLETE STOP. THIS HAS HAPPENED TO ME (6) TIMES OVER THE LAST MONTH. I
20	DRIVE 80 MILE ROUND TRIP TO WORK ON THE INTERSTATE EVERY DAY. I AM SCARED TO DRIVE THIS TRUCK ANYMORE IN FEAR OF KILLING MYSELF OR ANOTHER VEHICLE
	ON THE ROAD WHEN THIS PROBLEM OCCURS. I HAVE DONE A LOT OF RESEARCH ON
21	THE INTERNET AND THIS APPEARS TO BE A VERY WELL KNOW ISSUE. I WILL BE CONTACTING FORD TODAY AND SEE IF THEY HAVE ANY FIXES. BASED ON MY
22	RESEARCH FORD SEEMS TO BLOW OFF THIS ISSUE AND HAS NOT CAME UP WITH A FIX.
23	THIS IS A VERY DANGEROUS PROBLEM AND MAY END UP KILLING SOMEONE BEFORE THEY (FORD) TAKES IS SERIOUSLY.*TR
24	1 Affected Product
25	
26	August 5, 2010 NHTSA ID NUMBER: 10347488 Components: SUSPENSION
27	NHTSA ID Number: 10347488
28	Incident Date June 15, 2010 Consumer Location WATERFORD, CT
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	Class Action Complaint
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.96 Page 96 of 353
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I HAVE A 2006 FORD F-250 WITH THE 5.4L GAS MOTOR. SINCE NEW IT HAS NOT HANDLED VERY WELL AND SEEMED TO SHAKE BACK AND FORTH RATHER THAN UP AND DOWN ON BUMPS. NOW WHEN A BUMP OR POT HOLE IS HIT THE TRUCK SHAKES EXTREMELY VIOLENT LEFT AND RIGHT SO MUCH SO IT SPILT MY COFFEE AND ALL CHANGE FROM MY ASH TRAY. I HAVE ABOUT 50,000 MILES ON THE TRUCK NOW AND AT ABOUT 40,000 IT DID IT FOR THE FIRST TIME WHILE I WAS ON THE HIGH SPEED LANE GOING ABOUT 70 MPH IN HIGH SPEED TRAFFIC. THE TRUCK WOULD NOT STOP ITS VIOLENT SHAKE UNTIL I REACHED 15 MPH, IT WAS A MIRACLE THAT THE PERSON BEHIND ME DID NOT HIT ME THEN IT HAPPENED AGAIN THAT SAME DAY ABOUT TEN MILES DOWN THE ROAD AND ONCE MORE ON MY WAY HOME. SINCE THAT DAY IT HAS HAPPENED TO ME 3 SEPARATE TIMES. I AM NOW AFRAID TO DRIVE ME \$30,000 TRUCK ANY WHERE BUT AROUND TOWN. I HAVE KEPT UP ON ALL MAINTAINS ON THE VEHICLE AND TAKE GOOD CARE OF IT. NOW I FEEL LIKE I NEED TO GET RID OF IT BECAUSE I AM AFRAID TO GO ANYWHERE WITH IT. THIS SHAKING IS A VERY VIOLENT SHAKE THROUGH OUT THE ENTIRE TRUCK, IF I WAS HOLDING MY COFFEE THAT MORNING I KNOW I WOULD HAVE CRASHED. FORD NEEDS TO REMEDY THIS ISSUE AS LOOKING THROUGH THE TRUCK FORUMS I AM NOT EVEN CLOSE TO THE ONLY ONE WITH THE PROBLEM. <u>THERE IS AN ISSUE HERE AND IT IS JUST A MATTER OF TIME</u> UNTIL SOME ONE GETS KILLED DUE TO IT IF SOME ONE HAS NOT BEEN KILLED ALREADY. *TR I AIffected Product
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	September 6, 2010 NHTSA ID NUMBER: 10354071 Components: SUSPENSION NHTSA ID Number: 10354071 Incident Date August 20, 2010 Consumer Location WINSTED, CT Vehicle Identification Number 1FTSX21586E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WHILE DRIVING MY 2006 F250 SUPER DUTY TRUCK ON THE HIGHWAY I HAVE EXPERIENCED THE "DEATH SHAKE" I COULD NOT STEER THE TRUCK OR STOP IMMEDIATELY THE TRUCK,IT VEERED INTO THE NEXT LANE THANK GOD THERE WAS NO CARS THERE. THIS SCARED ME MY TWO CHILDREN AND MY FATHER IN-LAW I DON'T KNOW WHAT WOULD HAVE HAPPENED IF WE WERE ON A ROAD WITH NO GUARD RAILS. <u>WE COULD HAVE EASILY ALL BEEN KILLED</u> , THIS TRUCK HAS 40,000 -96- Class Action Complaint
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.97 Page 97 of 353
1 2 3	ADULT DRIVEN MILES NO LIFT NO BIG TIRES NO OFF USE. <u>THIS NEEDS TO BE</u> <u>ADDRESSED BY FORD AND BE PUT IN THE MEDIA BEFORE SOME ONE IS KILLED.</u> *TR 1 Affected Product
4 5 6 7 8 9	September 28, 2010 NHTSA ID NUMBER: 10358161 Components: SUSPENSION NHTSA ID Number: 10358161 Incident Date June 23, 2010 Consumer Location BELLOWS FALLS, VT Vehicle Identification Number 1FTSX21566E**** Summary of Complaint CRASHNo
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> </ol>	FIRENO INJURIESO DEATHSO I HAVE A 2006 F250 SUPERDUTY XLT, THE VEHICLE VIOLENTLY SHAKES IN THE FRONT END WHEN I HIT A SMALL BUMP AT HIGHWAY SPEEDS, ANYTHING OVER 50 MPH, SO BAD THAT I THINK MY DOORS ARE GOING TO POP OPEN. I DO LOSE BRIEF CONTROL, AND LET OFF THE ACCELERATOR TO GAIN CONTROL WITHOUT BRAKING. I HAVE RECEIVED A LETTER FROM FORD REGARDING THIS ISSUE STATING TO CHECK TIRE PRESSURE. I HAVE COMPLIED WITH THIS BUT STILL IS A FACTOR REGARDLESS. I DO NOT HAVE THE EXTRA MONEY TO DO ANY EXPENSIVE UPGRADES OR REPAIRS. THIS IS <u>A FORD ISSUE! THEY NEED TO FIX THIS PROBLEM BEFORE IT KILLS MANY PEOPLE</u> . THIS STARTED WHEN THE TRUCK WAS FAIRLY NEW AND IT ONLY HAS 38,000 MILES NOW. THIS IS A PROBLEM ALL OVER THE US THAT NEEDS TO BE ADDRESSED! I CAN'T GIVE A DATE BECAUSE IT HAPPENS ALL THE TIME! *TR 1 Affected Product
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	May 21, 2011 NHTSA ID NUMBER: 10403273 Components: SUSPENSION NHTSA ID Number: 10403273 Incident Date May 15, 2011 Consumer Location Unknown Vehicle Identification Number 1FTNF21516E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 UPON HITTING BUMPS ON ROADWAY I LOST COMPLETE CONTROL OF TRUCK FOR APPROX 2 TENTHS OF A MILE UNTIL I SLOWED DOWN. FRONT END SHOOK VIOLENTLY SOMEBODY IS GOING TO DIE IN ONE OF THESE DEATH TRAPS,I HOPE ITS NOT ONE OF MY KIDS 
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1	1 Affected Product
$\frac{2}{3}$	July 4, 2011 NHTSA ID NUMBER: 10410391
4	Components: SUSPENSION NHTSA ID Number: 10410391
5	Incident Date June 30, 2011
6	Consumer Location CLEVELAND, OH Vehicle Identification Number 1FTSW21586E****
7	Summary of Complaint
8	CRASHNo FIRENo
9	INJURIES0 DEATHS0
-	AT HIGHWAY SPEEDS 50-70MPH DRIVING OVER A POTHOLE OR BRIDGE EXPANSION
10	JOINT. USUALLY IF THE RIGHT FRONT TIRE HITS FIRST IT SENDS THE TRUCK INTO AN EXTREMELY VIOLENT SHAKING WITH LOSS OF STEERING CONTROL. THE TIRES START
11	BOUNCING SO HARD THAT THEY LEAVE THE PAVEMENT. IT WILL YANK THE STEERING
12	WHEEL OUT OF YOUR HAND IF YOU ARE NOT PAYING ATTENTION. THE ONLY WAY TO REGAIN CONTROL IS TO BRAKE HARD DOWN TO ABOUT 30MPH. THIS IS RIDICULOUSLY
13	DANGEROUS IN SO MANY WAYS. I CAN NOT BELIEVE THERE IS NOT A RECALL ON THIS. WITH A LITTLE RESEARCH ON THE INTERNET YOU WILL FIND THERE ARE NUMEROUS
14	SIMILAR COMPLAINTS ABOUT THE FRONT END OF THE 2006 FORD F250 I HAVE THE
15	PROPER TIRES WITH PROPER INFLATION I HAD A NEW STEERING GEAR BOX PUT ON WITH A NEW POWER STEERING UNIT THE PROBLEM IS BECOMING MORE FREQUENT $\underline{I}$
16	JUST GOT BACK FROM A 300 MILE TRIP THIS HAPPENED 8-10 TIMES AND IF TRAFFIC
17	PATTERNS WERE ANY DIFFERENT THIS POTENTIAL RECALL WOULD HAVE KILLED MY WHOLE FAMILY AND SOMEBODY ELSE'S! P.S. THERE ARE NUMEROUS PEOPLE
18	OUT THERE WHO HAVE SPENT THOUSANDS OF DOLLARS TRYING TO FIX THIS
19	ENGINEERING FLAW WITHOUT ANY SUCCESS. *TR 1 Affected Product
20	
21	September 15, 2011 NHTSA ID NUMBER: 10425534
22	Components: STEERING, SERVICE BRAKES, HYDRAULIC, SUSPENSION NHTSA ID Number: 10425534
23	Incident Date October 13, 2005
24	Consumer Location WINTERSVILLE, OH Vehicle Identification Number 1FTNF21506E****
25	Summary of Complaint
26	CRASHNo FIRENo
27	INJURIES0 DEATHS0
28	SHIMMY- THE SHIMMY PROBLEM THAT OCCURS IN THE 4X4 F250 SHOULD STILL BE A
	SIGNIFICANT ISSUE FOR THOSE OF US THAT STILL OWN THESE TRUCKS. THE DEALER -98-
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1 2 3 4	TRIED THE TIRE INFLATION STORY WITH ME, BUT THAT DID NOT CORRECT THE PROBLEM. ROAD RACING SPORT CARS FOR MANY YEARS I KNOW THAT ONE POUND CAN MAKE A DIFFERENCE IN HANDLING AND I MADE SURE THAT THE TIRES WERE INFLATED CORRECTLY. THEN THEY TOLD ME THAT FORD SENT THEM A NEW SET OF ALIGNMENT SPECS. WELL AS WE ALL KNOW NOW THAT DID NOT FIX IT EITHER. THEN THEY TOLD ME THAT THE TIRES BEING CUPPED WAS CAUSING THE SHIMMY, MY
5 6	RESPONSE TO THAT WAS THAT IT WAS THE SHIMMY CAUSING THE TIRES TO CUP NOT THE TIRES BEING CUPPED CAUSING THE SHIMMY, ALTHOUGH THE WORSE THE CUPPING, THE WORSE THE SHIMMY. AFTER INSISTING ON NEW TIRES AND THEN THE
7	NEW LINE UP SPECS, WE TRIED IT AGAIN. THEN 960 MILES LATER AND ONLY ROAD DRIVING THE SAME CUPPING WAS HAPPENING AGAIN. THEN IT WAS THE DAMPENER
8	AND ATTACH POINT THAT WAS THE PROBLEM. THEN 2 YEARS LATER CAME THE LETTER ABOUT DECELERATING AND APPLYING THE BRAKES AND THEN ABOUT 45 MPH
9	IT SHOULD FIX IT. I GUESS THAT WOULD BE OK UNTIL YOUR GOING DOWN THE INTERSTATE AT 70 MPH WITH AN 18 WHEELER BEHIND YOU GOING 70 MPH. <b>WOULD IT</b>
10	BE OK AFTER WHAT COULD BE A SERIOUS AND POSSIBLY FATAL ACCIDENT THAT I
11	COULD PULL OUT MY LETTER THAT I GOT FROM FORD AND TELL EVERYONE, SORRY BUT I DRIVE A FORD. *KB
12	1 Affected Product
13 14	September 19, 2011 NHTSA ID NUMBER: 10426295
14	Components: SUSPENSION, STEERING NHTSA ID Number: 10426295
16	Incident Date March 17, 2010
17	Consumer Location LAKEWOOD, CO Vehicle Identification Number 1FTSX21P26E****
18	Summary of Complaint CRASHNo
19	FIRENo INJURIESO
20	<b>DEATHS0</b> WHEN DRIVING HIGHWAY SPEEDS I NEVER KNOW WHEN THE FRONT END IS GOING TO
21	VIOLENTLY SHAKE SO BAD THAT I CAN'T SEE OUT THE REAR VIEW MIRRORS TO EVEN KNOW WHO IS AROUND ME WHEN MY TRUCK IS COMPLETELY OUT OF CONTROL. I
22	CAN'T BELIEVE SOMEONE HAS NOT DIED YET! IT'S NOT IF, BUT WHEN. A JOINT IN THE
23 24	ROAD, POT HOLE, OR JUST A PAVEMENT IRREGULARITY CAUSES IT, BUT I NEVER KNOW WHEN. I'VE ASKED SERVICE AND SALES TECHS AT BOTH PHIL LONG
24	FORD/LITTLETON, CO AND LAKEWOOD FORD/LAKEWOOD, CO AND RECEIVED THE SAME LINE OF CRAP, THAT I'M THE FIRST PERSON WHO EVER MENTIONED IT. CHECK
26	MY TIRE PRESSURE IS WHAT I'M TOLD. ALL I HAD TO DO WAS GOOGLE THE PROBLEM AND I FOUND A SEEMINGLY ENDLESS LIST OF COMPLAINTS OF THE EXACT SAME
27	PROBLEM. THIS SITE WAS ALREADY AWARE OF THE PROBLEM BECAUSE WHEN I WENT TO SELECT THE "FAILED COMPONENTS", STEERING WAS ALREADY HIGHLIGHTED. THIS
28	IS A \$50,000 TRUCK I'M AFRAID TO DO THE SPEED LIMIT IN. LOADED OR UNLOADED, PULLING A TRAILER OR NOT, THE PROBLEM CAN PRESENT ITSELF. <b>HOW MANY</b>
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1	<u>COMPLAINTS OR DEATHS DOES IT TAKE BEFORE FORD IS HELD RESPONSIBLE FOR</u> THIS DEFECT? *KB
2	1 Affected Product
3	
4	October 17, 2011 NHTSA ID NUMBER: 10430575 Components: STEERING, SUSPENSION
-	<b>NHTSA ID Number:</b> 10430575
6	Incident Date October 9, 2011 Consumer Location SIDNEY, OH
7	Vehicle Identification Number 1FTSW21566E****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0 DEATHS0
11	DRIVING MY 2006 FORD F250 SUPER DUTY CREW CAB 4X4 AT HIGHWAY SPEED OF 70
12	MPH THE TRUCKS FRONT END BEGAN TO VIBRATE AND BOUNCE UNCONTROLLABLY AFTER GOING OVER AN UNEVEN SECTION OF BRIDGE. THE VIBRATION WAS SO BAD I
13	THOUGHT THE FRONT END OF THE TRUCK WAS GOING TO TEAR ITSELF APART. AS I
14	BEGAN TO SLOW THE TRUCK DOWN AND GET OUT OF THE NORMAL TRAFFIC LANES THE VIBRATION AND BOUNCING DID NOT FINALLY SUBSIDE UNTIL ABOUT 35 MPH.
	WHILE THIS OCCURRED WITH MY ENTIRE FAMILY IN THE TRUCK I WAS FEARFUL OF
15	WHAT MAY HAPPEN AND WHEN IT MAY HAPPEN AGAIN AS WE WERE STILL SEVERAL HOURS FROM OUR HOME. A FEW MILES LATER WE CROSSED ANOTHER BRIDGE THIS
16	TIME DOING 65 MPH AND THE FRONT END BEGAN TO VIBRATE AGAIN BUT STOPPED
17	MUCH QUICKER THAN BEFORE ONCE I DECREASED TO 45MPH. <u>THIS ISSUE IS</u> RAMPANT ON THE VEHICLE REPORTING WEBSITES AND WILL EVENTUALLY GET
18	SOMEONE KILLED. I PRAY FORD DECIDES TO FINALLY INVESTIGATE AND OFFER
19	SOME FACTUAL EVIDENCE AND A PERMANENT SOLUTION TO THE PROBLEM SO MANY DRIVERS ARE EXPERIENCE WITH THESE TRUCKS.I LOVE MY FORD TRUCK
20	BUT NOT AT THE COST OF LOSING MY LIFE OR CAUSE INJURY TO SOMEONE ELSE.
21	*TR 1 Affected Product
22	I Allecteu Product
23	June 6, 2012 NHTSA ID NUMBER: 10460739 Components: STEERING, SUSPENSION
24	NHTSA ID Number: 10460739
25	Incident Date June 6, 2012 Consumer Location FRANKLIN, IN
26	Vehicle Identification Number 1FTSX21516E****
27	Summary of Complaint CRASHNo
28	FIRENo
	INJURIES0 -100-
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.101 Page 101 of 353
1 2 3 4 5 6 7 8 9 10 11 12	<b>DEATHS0</b> I HAVE BEEN HAVING THIS PROBLEM FOR ALMOST A YEAR NOW AND HAVE READ THOUSANDS OF OTHER COMPLAINTS THAT IS THE SAME ISSUE. THIS TRUCK ALL MOST KILLED ME AGAIN TODAY. IT GOES INTO A "DEATH WOBBLE" WHEN YOU HIT A BUMP IF YOU ARE OVER 55MPH. IF YOU ANRT EXPECTING IT TO HAPPEN AND IT IS THE 1ST TIME YOU EXPERIENCE IT YOU WILL WRECK! I HAVE CONTACTED SEVERAL DEALERS AND NO ONE SEEMS TO KNOW ABOUT OR HEARD ABOUT IT BUT THERE IS THOUSANDS OF COMPLAINTS ONLINE AND ALSO HAVE RECEIVED A LETTER FROM FORD STATING TO CHECK TIRE PRESSURES! I HAVE DONE WHAT THEY SAID + HAD NEW SHOCKS, HAD NEW TIRES, STRUTS CHECKED, BALL JOINTS CHECKED, AND REAR SUSPENSION LOOKED AT. NOTHING IS WRONG <u>THIS IS CLEARLY A FACTORY PROBLEM AND IT</u> <b>NEEDS TO BE TAKEN CARE OF BEFORE PEOPLE START DIEING FROM IT! IS FORD</b> <b>GOING TO RAISE MY CHILDREN WHEN THIS MAKES ME WRECK AND DIE</b> NO THEY ARE NOT SO THEY NEED TO GET THIS TAKEN CARE OF. REPORTS SAY THAT THEY HAVE CHANGED THE SET UP ON NEWER HEAVY DUTY TRUCKS BECAUSE OF THIS SO WHY AREN'T THEY TAKING CARE OF THE ONE'S THEY ALREADY SOLD TO THE PUBLIC! PLEASE HELPYOU CAN FIND TONS OF INFO IF YOU SEARCH " DEATH WOBBLE OR DEATH SHAKE! *TR <b>1 Affected Product</b>
13	October 28, 2010 NHTSA ID NUMBER: 10362821
14	Components: SUSPENSION, TIRES
15 16 17	NHTSA ID Number: 10362821 Incident Date October 26, 2010 Consumer Location ALPINE, UT Vehicle Identification Number 1FTWW31P86E****
18	Summary of Complaint CRASHNo
19	FIRENo INJURIES0
20	<b>DEATHS0</b> 1. TRAVELING AT 65 MPH HITTING A BUMP IN THE ROAD 2. FRONT AXLE BEGINS
21	OSCILLATING WITH SUCH VIOLENCE THAT CONTROL OF THE TRUCK IS DIFFICULT
22	UNTIL SLOWED DOWN, THE ENTIRE VEHICLE SHAKES TO THE POINT YOU FEEL IT WILL COME APART. I WAS TRAVELING ON A HIGHWAY WHEN I EXPERIENCED THIS. I
23	NEARLY CAUSED AN ACCIDENT. I'M TERRIFIED WHEN THIS WILL HAPPEN ON A ICY ROAD. <b>SOMEONE IS GOING TO GET KILLED</b> . 3. NOTHING. APPARENTLY THERE IS NO
24	FIX AS IT IS UNKNOWN. FORD IS AWARE OF THE PROBLEM BUT REFUSES TO BE HELD
25	RESPONSIBLE. VEHICLE INFORMATION: ? 2006 ? FORD ? F350 ?? ENTIRE FRONT SUSPENSION COMPONENT ? VIN - [XXX] ? TIRES BFG ALL TERRAIN 325/65 R18.
26	INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA),
27	5 U.S.C. 552(B)(6). *TR 2 Affected Products
28	
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	Class Action Complaint Case No.

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	August 1, 2013 NHTSA ID NUMBER: 10533024 Components: SUSPENSION, STEERING NHTSA ID Number: 10533024 Incident Date August 1, 2013 Consumer Location CLINTON, TN Vehicle Identification Number 1FTWX33P16E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO OUR TRUCK EXPERIENCED A SEVERE, VIOLENT WOBBLE THAT STARTED AFTER TRAVELING OVER A UNEVEN SPOT ON THE ROAD. WE FEARED FOR OUR LIVES AS THIS OCCURRED WHILE PASSING ANOTHER TRUCK ON A BRIDGE WITH HEAVY TRAFFIC BEHIND US. THE SHAKING AND WOBBLE CONTINUED FOR ABOUT 20 SECONDS, AND DID NOT STOP UNTIL THE TRUCK SLOWED DOWN TO ABOUT 40 MILES AN HOUR. ALL OUR TIRES HAVE BEEN RECOMMENDED AND INSTALLED AT THE FORD DEALERSHIP. I MAINTAIN TIRE PRESSURES AS INDICATED ON DOOR JAM. 75 LB ON FRONT AND 60 LB ON REAR TIRES. THERE ARE NO AFTERMARKET MODIFICATIONS ON OUR TRUCKI CONSIDER THIS ISSUE VERY DANGEROUS, AND WONDER HOW MANY FOLKS MAY HAVE BEEN INJURED OR KILLED AS A RESULT OF THEIR TRUCK SUDDENLY BECOMING UNCONTROLLABLE, AS OURS DID. *TR 1 Affected Product
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	January 18, 2016 NHTSA ID NUMBER: 10820797 Components: ELECTRONIC STABILITY CONTROL, SUSPENSION, STEERING NHTSA ID Number: 10820797 Incident Date August 8, 2015 Consumer Location SANDWICH, MA Vehicle Identification Number 1FTWW31566E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 FORD F-350 2006 COMPLAINT. WE HAVE EXPERIENCED VIOLENT SHAKING (SHIMMYING) WHEN THE TRUCK HITS A BUMP ON THE HIGHWAY AND AS A RESULT, EXTREME DIFFICULTY MAINTAINING THE VEHICLE ON THE ROAD. OUR FIRST EXPERIENCE WAS IN AUGUST 2015, ON THE INTERSTATE HIGHWAY WHILE TRAVELLING AT 75MP. WE HIT A BUMP AND THE TRUCK / STEERING WHEEL SHOOK VIOLENTLY FOR ABOUT 10 SECONDS CAUSING US TO SWERVE ACROSS LANES AND STRUGGLE TO KEEP THE TRUCK IN THE LANE AND OUT OF TRAFFIC'S WAY. WE HAVE SINCE EXPERIENCED THIS PROBLEM FOUR MORE TIMES HITTING BUMPY HIGHWAYS AT SPEEDS AS LOW AS 50MMP AND AS RECENT AS 2 WEEKS AGO. WE HAVE CHECKED IT OUT AND OUR MECHANIC ADVISED THAT HE COULD NOT FIND ANYTHING WRONG. IT HAS BEEN A -102- Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.103 Page 103 of 353
1 2 3 4 5 6 7 8	GREAT CONCERN OF OURS AS IT PUTS OUR LIVES (AND THOSE ON THE ROAD WITH US) AT DANGER WHEN THIS ISSUE OCCURS. ADDITIONALLY, EVERY TIME THE VIOLENT SHAKING OCCURS, IT THROWS OFF THE ALIGNMENT AND BALANCING FOR THE TRUCK. WE HAVE JUST RECEIVED A LETTER FROM FORD ADVISING OF THIS PROBLEM AND I HAVE CALLED THE SERVICE CENTER FROM THE FORD DEALER WE BOUGHT THE VEHICLE FROM. FORD IS NOT ASSUMING RESPONSIBILITY FOR ANY DIAGNOSIS OR REPAIRS TO THESE DEFECTS AT THIS TIME. OUR TIRE PRESSURE IS IN KEEPING WITH FORD'S RECOMMENDATIONS AS THEY SUGGEST IN THEIR LETTER. FORD F-350 TRUCKS SHOULD NOT BE APPROVED FOR USE ON HIGHWAYS AS THIS DEFECT COULD RESULT IN FATAL ACCIDENTS IF THE SHAKING CANNOT BE CONTROLLED. ALSO, FORD SHOULD BE RESPONSIBLE FOR REPAIRING THE FAULTY TRUCKS. 1 Affected Product
<ul> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> </ul>	September 30, 2010 NHTSA ID NUMBER: 10358378 Components: STEERING NHTSA ID Number: 10358378 Incident Date September 28, 2010 Consumer Location CAMDEN, NJ Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I HAVE AN '06 F-350. AT 55MPH+, HITTING A BUMP WILL ALMOST CAUSE THE TRUCK TO SELF DESTRUCT. THE STEERING WHEEL SHAKES VIOLENTLY. FORD SEEMS TO NOT BE ABLE TO FIX THE ISSUE. PLEASE FORCE A RECALL BEFORE PEOPLE ARE KILLED. *TR 1 Affected Product
20 21 22 23 24 25 26 27 28	October 29, 2014 NHTSA ID NUMBER: 10651012 Components: STEERING NHTSA ID Number: 10651012 Incident Date February 5, 2013 Consumer Location STOCKTON, CA Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO STEERING WOBBLE AND SHAKES. THIS HAS BEEN GETTING WORSE AS TIME GOES ON. ANYTIME I HIT A BUMP ON THE FREEWAY MY TRUCK STARTS TO VIOLENTLY SHAKE AND WOBBLE. IT IS EVEN WORSE ON A ROAD CURVE. IT IS VERY DANGEROUS TO -103-
	Class Action Complaint Case No.

¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.104 Page 104 of 353
1 2 3 4 5 6 7 8	DRIVING ON THE FREEWAY IN THE MOUNTAINS. I FEW TIMES I ALMOST LOST CONTROL. THE SHAKE DOES NOT GO AWAY UNTIL I SLOW DOWN BELOW 40MPH WHICH CAUSES ANOTHER DANGEROUS SITUATION WHILE ON THE FREEWAY. I HAVE CHANGED TIRES, CHECKED PRESSURE AND ROTATED TIRES. ALSO, I REPLACED STEERING DAMPENER. NOTHING HAS WORKED TO DIMINISH THE SHAKE. I ALSO HAD THE 4 WHEEL ALIGNMENT CHECKED AND THE SHOP SHOWED ME THAT IT WAS CORRECT. THEY CHECKED EVERYTHING AND COULD NOT FIND ANYTHING THAT WAS WORN OUT AND NEEDED CHANGING. I WAS TOLD NO REPAIRS NEEDED. <u>THIS IS A</u> <u>VERY DANGEROUS SITUATION AND NEEDS TO BE CORRECTED BEFORE BODIES</u> <u>START PILING UP.</u> *TR 1 Affected Product
8	
9	May 4, 2009 NHTSA ID NUMBER: 10267644
0	Components: SUSPENSION NHTSA ID Number: 10267644
1	Incident Date February 17, 2007
2	Consumer Location SILOAM SPRINGS, AR Vehicle Identification Number 1FTWW33P26E****
	Summary of Complaint
.3	CRASHNo
4	FIRENo INJURIES0
5	<b>DEATHS0</b>
6	I AM DISAPPOINTED IN THE FINDINGS ON THE F-350 SUPERDUTY FRONT SUSPENSION
7	SHIMMY AS IT IS CALLED. I HAVE A 06 F-350 SD WITH ONLY 54,000 MILES ON IT. THE FRONT END HAS BEEN COMPLETELY REPLACED TWICE AND NEEDS IT AGAIN BUT
	FORD WILL NOT WARRANTY IT BECAUSE OF THE FACTORY WARRANTY EXPIRING.
8	THIS SEVERE SHIMMY IS REAL AND TO ALLOW A FINDING THAT STATES THE TIRE PRESSURE IS TO BLAME IS COMPLETELY FALSE AND SO STUNNING. DOES THE ODI
9	REALLY EXPECT THE VEHICLE OWNERS TO BUY THIS. LOOKS LIKE FORD HAD ITS
20	HAND IN THIS ONE AGAIN. I WANT MY TRUCK FIXED AND I WILL NOT PAY FOR IT.
21	FORD KNOWS THIS PROBLEM EXIST BUT IS NOT LARGE ENOUGH YET TO RECALL. <u>WILI</u> SOMEONE DIE FIRST? MY TRUCK IS THAT SEVERE IT WILL LEAVE THE ROAD IF
	YOUR NOT EXPECTING IT. THE TIRE PRESSURE IS CORRECT AND NO SUSPENSION
22	MODIFICATIONS. I HAVE HAD THIS FRONT END COMPLETELY REBUILT TWICE EVERY
23	YEAR SO FAR SINCE PURCHASE AND AS OF MARCH OF THIS YEAR IT NEEDS IT AGAIN. THEY WANTED TO CHARGE ME \$1400.00 TO FIX IT EVEN THOUGH IT HAS REALLY
24	NEVER BEEN FIXED FROM THE INITIAL REPAIR. PLEASE COME TAKE A RIDE AND
25	CHECK MY TIRE PRESSURE YOU WILL BE COMPLETELY SCARED BEFORE WE ARE
26	DONE. *TR 1 Affected Product
27	
	August 14, 2011 NUTSA ID NUMBED, 10410226
28	August 14, 2011 NHTSA ID NUMBER: 10419336 Components: SUSPENSION
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	Class Action Complaint
	Case No.

c	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.105 Page 105 of 353
1 2 3 4 5 6 7 8 9 10 11 12	NHTSA ID Number: 10419336 Incident Date July 17, 2011 Consumer Location NOVATO, CA Vehicle Identification Number 1FTWW31P76E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 THIS HAS HAPPENED SEVERAL TIMES WHEN THE TRUCK IS TRAVELING ALONG A ROAD OR HIGHWAY. YOUR DRIVE TURNS INTO A DEATH WOBBLE. THE TRUCK IS UNCONTROLLABLE AND JUMPS LANES AND IS ALL OVER THE ROAD. THIS IS A DANGER THAT HAS BEEN PRESENTED TO FORD BY MANY AND IT IS JUST BEING IGNORED. <u>THIS</u> IS A TRUE DANGER AND MAY NOT ONLY KILL THE DRIVER AND PASSENGERS BUT ANYONE DRIVING DOWN THE ROAD. IT'S ALL OVER THE INTERNET AND HAPPENING ALL OVER THE COUNTRY. THIS IS BEING SWEPT UNDER THE CARPET, JUST AS THE PINTO WAS, WITH MANY DEATHS. YOU AS THE SAFETY BOARD NEED TO STEP UP AND DO SOMETHING SO CONSUMERS CAN DRIVE THE VEHICLES THAT THEY HAVE PURCHASED, FOR MANY OVER \$55,000. *TR 1 Affected Product
13	
14	January 13, 2016 NHTSA ID NUMBER: 10820036
15 16	Components: SUSPENSION NHTSA ID Number: 10820036
10	Incident Date January 1, 2015 Consumer Location CLEVELAND, SC
18	Vehicle Identification Number 1FTWW33P56E**** Summary of Complaint
19	CRASHNo FIRENo
20	INJURIES0
21	<b>DEATHS0</b> DEATH SHIMMY. STEERING WHEEL SHAKES VIOLENTLY WHEN A BUMP OR
22	DISCONTINUITY IN THE ROAD IS ENCOUNTERED. YOU CANNOT HOLD THE STEERING WHEEL DURING THIS EVENT. CURE IS TO REDUCE VEHICLE SPEED BELOW 15 MPH. THIS
23	IS HAZARDOUS IF TRAVELING AT HIGH SPEED OR PULLING A TRAILER. AS YOU
24	CANNOT HOLD THE WHEEL DURING THIS EVENT, <u>THE VEHICLE WILL CHANGE LANES</u> AND PRESENTS A FATAL HAZARD AS YOU ATTEMPT TO REDUCE SPEED FROM 65
25	MPH TO BELOW 15 MPH WITHOUT STEERING CONTROL. FORD ACKNOWLEDGES THE
26	PROBLEM IN LETTER 09L02 SENT IN 2009 AND AGAIN IN 2015. THEIR SOLUTION TO PROPERLY INFLATE THE TIRES IS FALSE AS TIRE PRESSURE HAS NO EFFECT ON
27	OCCURANCE OR SEVERITY. I HAVE REPLACED THE TIRES AND RUN UP THE PRESSURE
28	IN 5 LB INCREMENTS FROM 55 TO 80 PSI. NO EFFECT IN THE FREQUENCY OR SEVERITY OF THE VIBRATION. ## VIN PASSED ## FORD F350 SUPER DUTY 2006 ##
-0	1 Affected Product
	-105- Class Action Complaint
	Case No.

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1	
2	January 30, 2012 NHTSA ID NUMBER: 10445958
3	Components: STEERING
4	NHTSA ID Number: 10445958
	Incident Date May 25, 2011 Consumer Location BOWLING GREEN, KY
5	Vehicle Identification Number 1FTWW33P46E****
6	Summary of Complaint
7	CRASHNo FIRENo
8	INJURIES0
	DEATHSO
9	I PURCHASED THE TRUCK USED MAY 2011. THE VERY DAY I PURCHASED THE TRUCK I GOT A WOOBLE WHEN I HIT A BUMP. THIS IS A DAILY OCCURANCE. WHEN I HIT A
10	BUMP JUST RIGHT OR WHEN I APPLY MEDIUM TO HARD BREAKING IT BEGINS TO
11	WOBBLE TO GET IT UNDER CONTROL I HAVE TO BREAK HARD AND COME ALMOST TO
12	A COMPLETE STOP. I HAVE HAD IT IN THE DEALERSHIP 3 TIMES I WAS TOLD THERE WAS NOTHING WRONG WITH THE FRONT END, AND WAS TOLD TO ADJUST MY AIR
13	PRESSURE LOWER, THEY ADJUSTED IT, IT CORRECTED NOTHING. I HAVE BEGAN TO
	JUST DRIVE AND DEAL WITH IT TILL TODAY. IT SHOOK ME INTO AN ONCOMING LANE
14	BEFORE I GOT IT UNDER CONTROL. I REALIZE THIS IS NOT A NEW TRUCK, <u>THIS</u> PROBLEM SEEMS TO BE BEING SWEPT UNDER THE RUG. SOME WILL GET INJURED
15	OR KILLED IF THIS IS NOT RESOLVED. I DON'T DARE LET MY WIFE DRIVE THE TRUCK
16	BECAUSE I KNOW SHE DOES NOT HAVE THE SKILLS TO CONTROL THIS. *TT 1 Affected Product
17	1 Allecteu 1 louuct
18	D 1 05 0012 NUMERA ID NUMBED 10555004
	December 25, 2013 NHTSA ID NUMBER: 10557224 Components: STEERING
19	NHTSA ID Number: 10557224
20	Incident Date October 15, 2013
21	Consumer Location ANTIOCH, CA Vehicle Identification Number 1FTWW31P46E****
22	Summary of Complaint
23	CRASHNo FIRENo
24	INJURIES0
	<b>DEATHS0</b> FORD TRUCKS HAVE A SEVERE SHIMMY AT HIGHWAY SPEEDS THAT WILL MAKE THE
25	TRUCK CHANGE LANES OR GO OFF THE ROAD, MY WIFE HAD TO STOP IN THE FAST
26	LANE BECAUSE IT WOULD NOT STOP SHAKING, WE HAD IT TOWED TO FORD AND WERE
27	TOLD THIS IS A NORMAL CHARACTERISTIC OF TRUCKS AND THAT THERE IS NO FIX ? WHAT IS THE NUMBER OF PEOPLE THAT MUST DIE BEFORE YOU ADDRESS THIS
28	<b>PROBLEM ?</b> THE TRUCK HAS NEW TIRES OF FACTORY SPECS. ?*TR
	1 Affected Product
	-106- Class Action Complaint
	Case No.

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1	
2	April 3, 2015 NHTSA ID NUMBER: 10703474
3	Components: STEERING, FUEL/PROPULSION SYSTEM, ENGINE
1	NHTSA ID Number: 10703474
4	Incident Date April 3, 2015 Consumer Location TRIADELPHIA, WV
5	Vehicle Identification Number N/A
6	Summary of Complaint
7	CRASHNo FIRENo
8	INJURIES0
8	DEATHS0
9	PURCHASED THIS VEHICLE LESS THAN A YEAR AGO AND WAS ORIGINALLY VERY
10	PLEASED. SUDDENLY WE ARE NOW EXPERIENCING THE DEATH WOBBLE AS OTHER HAVE DESCRIBED. THE VIOLENT SHAKING OF THE FRONT END. THIS USUALLY OCCURS
11	WHEN YOU ARE APPROACHING THE SPEED OF 60MPH. WE DO NOT HAVE TO HIT A
	BUMP FOR IT TO HAPPEN. THE OTHER COMPLAINT, IS THAT WE BOUGHT THIS TRUCK
12	WITH VERY LOW MILEAGE FOR THE YEAR, RAN GREAT, LOOKED GREAT, VERY PLEASED UNTIL THIS LAST MONTH WHEN THE CHECK ENGINE LIGHT CAME ON AND IT
13	SEEMS TO SPUTTER. PUT SOME HIGH QUALITY FUEL INJECTOR CLEANER IN THE
14	TRUCK, THINKING IT MAY BE A INJECTOR STICKING. NOPE, DIDN'T FIX THE PROBLEM.
15	LIGHT NEVER WENT OFF. TOOK IT TO A DEALERSHIP, THEY TESTED IT AND CAME BACK WITH YOUR FUEL TANK IS DETERIORATING PUTTING LITTLE METAL SHARDS IN
	YOUR ENGINE. YOU ARE LOOKING AT A POTENTIAL FULL ENGINE REBUILD COSTING A
16	MINIMUM OF \$6000. THIS IS UNACCEPTABLE FOR ANY VEHICLE MANUFACTURER TO
17	NOT RECALL A VEHICLE THAT HAS A SERIOUS KNOWN PROBLEM. WE ARE STUCK WITH
18	THIS TRUCK THAT IS NOT WORTH THE DAMN PAPER THE TITLE IS WRITTEN ON. IT IS TIRING OF READING ALL THESE SIMILAR COMPLAINTS AND NO ONE IS DEFENDING THE
19	CONSUMERS. AT WHAT POINT, DOES THE MANUFACTURER NEED TO BE HELD
	RESPONSIBLE TO OWN UP TO THE FAULTY EQUIPMENT AND FIX THE PROBLEMS?
20	WHEN MY CHILD IS KILLED BECAUSE OF THE INABILITY TO CONTROL THE VEHICLE DUE TO THE STEERING PROBLEMS IN THE FRONT END OR THAT IT STOPS
21	RUNNING IN THE MIDDLE OF THE HIGHWAY OR DOWNTOWN TRAFFIC BECAUSE
22	THE FUEL TANK DETERIORATED FOR NO REASON AND DESTROYED THE ENGINE.
23	*TR 1 Affected Product
24	
25	September 20, 2012 NHTSA ID NUMBER: 10476568 Components: STEERING, SUSPENSION
26	NHTSA ID Number: 10476568
27	Incident Date September 12, 2012
	Consumer Location FRANKLIN, OH Vehicle Identification Number N/A
28	Summary of Complaint
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	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.108 Page 108 of 353
1 2	CRASHNo FIRENo NULIDIESO
3	INJURIESO DEATHSO
4	HIGH SPEED WHEEL OSCILLATION OCCURRED WHILE DRIVING THE SPEED LIMIT OF INTERSTATE 275 AROUND CINCINNATI, OHIO. I HIT A BUMP ON THE EXIT OF THE
5	INTERSTATES BRIDGE AND THE STEERING WHEEL SHOOK REALLY BAD LEFT AND RIGHT. I HAD RECEIVED A LETTER LAST YEAR WARNING ME ABOUT THIS CONDITION. I
6	DID NOT THINK I HAD A PROBLEM WITH THIS TRUCK UNTIL THIS HAPPENED. I WAS
7	LUCKY THAT I DID NOT CRASH THIS VEHICLE WHEN THE OSCILLATION OCCURRED. I RESEARCHED THIS ON THE INTERNET AND SEVERAL OTHER OWNERS FOR THE F250
8	HAVE HAD THE SAME PROBLEM. FORD NEEDS TO FIX THIS PROBLEM BEFORE SOMEONE GETS KILLED! *TR *JS
9	1 Affected Product
10	
11	January 17, 2011 NHTSA ID NUMBER: 10376922 Components: STEERING
12	NHTSA ID Number: 10376922
13	Incident Date December 17, 2010 Consumer Location NORTH LAS VEGAS, NV
14	Vehicle Identification Number 1FTNF21507E**** Summary of Complaint
15	CRASHNo
16	FIRENo INJURIES0
17	<b>DEATHS0</b> FORD SUPER DUTY DEATHWOBBLE. PROBLEM HAS PERSISTED SINCE NEW. FAILURE
18	OCCURS AT SPEEDS BETWEEN 30 AND 75MPH. FAILURE MANIFESTS AS
19	UNCONTROLLABLE STEERING AND WHOLE VEHICLE OSCILLATION. HAS LED TO LOSS OF CONTROL OF VEHICLE MORE TIMES THAN I CAN REMEMBER. UNEVEN ROAD
20	SURFACE INSTIGATES SAID LOSS OF CONTROL. HAVE CHANGED SHOCKS AND
21	SPRINGS, ADDED DUAL STEERING STABILIZER IN ADDITION TO CHANGING STABILIZER IN STOCK LOCATION, BALL JOINT CASTER CAMS ADDED, NEW TIRES ADDED (TWICE)
22	MULTIPLE ALIGNMENTS. MOST CORRECTIVE ACTION TAKEN IS NOT TO DRIVE IT AND JEOPARDIZE MY LIFE OR THE LIVES OF OTHERS. HOW MANY NEED TO BE KILLED OR
23	INJURED BEFORE SOMEONE CAN BE HELD ACCOUTABLE? *TR 1 Affected Product
24	
25	February 22, 2014 NHTSA ID NUMBER: 10565456
26	Components: SUSPENSION, STEERING
27	NHTSA ID Number: 10565456 Incident Date February 22, 2014
28	Consumer Location MANCHESTER, MD
	Vehicle Identification Number 1FTWW31P27E**** -108-
	Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.109 Page 109 of 353
1 2 3 4 5 6 7 8 9 10	Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I WAS DRIVING ON AND OVERPASS/ EXIT RAMP AND PASSED OVER A STEEL DIVIDER ON THE HIGHWAY. UPON DOING SO I TEMPORARILY LOST CONTROL OF THE STEERING ON THE TRUCK AND HAD TO DECELERATE AND MOVE TOWARDS THE SHOULDER. I RECEIVED AN INFORMATION BULLETIN FROM FORD ABOUT THIS POTENTIAL "STEERING WOBBLE" AND MADE SURE TO CHECK OUT ALL OF THEIR RECOMMENDATIONS. AFTER DOING SOME RESEARCH ONLINE <u>I FEEL AS THOUGH</u> THIS IS A MAJOR ISSUE AND FORD SHOULD BE DOING SOMETHING BEFORE MORE PEOPLE ARE INJURED OR KILLED. THERE ARE SEVERAL ONLINE FORUMS ADDRESSING THIS ISSUE AND IT SEEMS AS THOUGH FORD IS NOT BEING HELD RESPONSIBLE. *TR 1 Affected Product
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> </ol>	October 15, 2010 NHTSA ID NUMBER: 10360616 Components: STEERING, SUSPENSION, EQUIPMENT NHTSA ID Number: 10360616 Incident Date October 11, 2010 Consumer Location MANASSAS, VA Vehicle Identification Number 1FTWW31P17E**** Summary of Complaint
16 17	CRASHNo FIRENo INJURIES0
18 19 20	<b>DEATHS0</b> 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE EXPERIENCED THIS PROBLEM SINCE TRUCK WAS ALMOST NEW. NOW HAVE 61 K MILES AND IT IS ALOT WORSE. AS THE 08 AND 09 INVESTIGATIONS REVEALED, THE STEERING
21 22	WOBBLE HAPPENS WHEN CROSSING UNEVEN PAVEMENT, CONCRETE, DIPS IN THE ROAD, RAILROAD CROSSINGS (AT SLOW SPEEDS). HAPPENS WHILE EMPTY AND WHEN TOWING A FLATBED GOOSENECK TRAILER AND/OR MY 5TH WHEEL RV. THIS HAS NOT BEEN RESOLVED BY FORD YET AND THEY DON NOT KNOW HOW TO FIX. I BELIEVE IT IS
23 24	A BAD STEERING BOX?? THEY ONLY WANT TO USE US/ME AS "GUINEA PIGS" TO FIX. THEY TELL US TO REPLACE SHOCKS, STEERING DAMPERS, AND TIRES. I HAVE PUT TWO SETS OF MICHELINS ON TRUCK AND DOES NOT HELP AT ALL. ACCORDING TO INFO ON
25 26	INTERNET THIS PROBLEM HAS BEEN GIVEN THE "DEATH WOBBLE" NICKNAME. I WOULD LIKE YOU ALL TO SEE IF FORD HAS TRIED ANYTHING OTHER THAN TELLING US DUMB VEHICLE OWNERS THAT WE DON'T HAVE ENOUGH AIR PRESSURE IN OUR FRONT TIRES. I HAD MY TIRES INSTALLED AND REBALANCED TWO TIMES AT THE
27 28	LOCAL FORD DEALER AND DOES NOT FIX THE PROBLEM. <u>I FEEL THE TRUCK IS VERY</u> UNSAFE TO DRIVE AT ANY SPEED AND THERE NEEDS TO BE A WAY GET TO THE BOTTOM OF THIS BEFORE SOMEONE OR MORE PEOPLE GET HURT OR KILLED. THE
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1 2 3 4 5	INTERNET IS FULL OF HORROR STORIES AS TO THIS PROBLEM. I FOR ONE AM READY TO CONSULT LEGAL HELP. I JUST SPOKE WITH FORD CUSTOMER SERVICE (COMPLAINT #[XXX]) AND ONCE AGAIN THEY SAID TAKE IT TO ANOTHER DEALER AND MAYBE I'LL HAVE BETTER LUCK.????? PLEASE HELP AND RESPOND.[XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6) <b>1 Affected Product</b>
6 7 8	June 28, 2012 NHTSA ID NUMBER: 10463493 Components: STEERING, SUSPENSION NHTSA ID Number: 10463493 Incident Date June 16, 2012
9 10	Consumer Location WALLINGFORD, PA Vehicle Identification Number 1FTWW31597E**** Summary of Complaint CRASHNo
11 12	FIRENo INJURIESO DEATHSO
13 14	I WAS DRIVING DOWN THE HIGHWAY AT AROUND 65MPH AND WENT OVER A EXPANSION JOINT ON A BRIDGE AND THE FRONT END OF THE TRUCK STARTED SHAKING SO BAD THAT IT RIPPED THE STEERING WHEEL OUT OF MY HAND. I HAD TO
15 16 17	COME TO A COMPLETE STOP TO MAKE THE SHAKING STOP, I THOUGHT I HAD A FRONT TIRE BLOW OUT,NEARLY HIT THE CAR IN THE LANE NEXT TO ME. I TOOK IT BACK TO THE DEALER THEY PUT A NEW STEERING DAMPENER ON IT AND SAID TRY IT, BUT IT WILL PROBABLY NOT BE ANY BETTER, THEN THE NEXT FIX IS TO PUT ON A BIGGER
18 19	STEERING WHEEL SO I CAN HOLD ON BETTER WHEN IT HAPPENS. LOOK ON LINE THIS KNOWN AS THE "FORD WHEEL OF DEATH" THERE IS A BUNCH OF VIDEOS ON YOU TUBE ABOUT IT AND SOME ACTUALLY SHOW IT HAPPEN. SOMEBODY NEEDS TO MAKE
20	FORD PAY FOR A PROPER FIX BEFORE SOMEONE GETS KILLED. *TR 1 Affected Product
21	Ordeling 5, 2010 NUTERA ID NUMBED: 1025027(
22	October 5, 2010 NHTSA ID NUMBER: 10359276 Components: STEERING, SUSPENSION
23	NHTSA ID Number: 10359276 Incident Date September 15, 2010
24 25	Consumer Location MORGANTOWN, WV Vehicle Identification Number 1FTSX21518E****
26	Summary of Complaint CRASHNo
20	FIRENo
28	INJURIES0 DEATHS0
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1	I HAVE A 2008 FORD F250 5.4L V8 GAS TRUCK THAT I PURCHASED NEW, I HAVE LESS
2	THAN THIRTY THOUSAND MILES ON IT AND HAVE EXPERIENCED A NEAR LOSS OF
2	CONTROL WHEN DRIVING INTERSTATE SPEEDS WHEN A BUMP IN THE ROAD CAUSES THE FRONT WHEELS TO OSCILLATE VIOLENTLY. THE ENTIRE TRUCK FEELS AS
4	THOUGH IT IS GOING TO SHAKE APART AND YOU CAN NOT STEER THE TRUCK AT ALL UNTIL YOU SLOW TO AROUND THIRTY MILES AN HOUR. THIS IS VERY DANGEROUS AS
5	YOU CAN NOT MAINTAIN LANE CONTROL AND OFTEN DRIFT INTO THE OTHER LANE OR EMERGENCY PULL OFF LANE. THE TRUCK IS COMPLETELY STOCK AND HAS THE
6	FACTORY TIRES, RIMS EVERYTHING I HAVE HAD ALL SERVICE DONE AT THE LOCAL
7	FORD DEALERSHIP GARAGE WHERE I BOUGHT THE TRUCK. I HAVE TAKEN IT IN NUMEROUS TIMES AND EACH TIME THEY ATTRIBUTED THE PROBLEM TO LOW TIRE
8	PRESSURE, EVEN THOUGH IT WAS EXACTLY 75 PSI AS IS THE RECOMMENDATION ON THE DOOR STICKER. SOMEONE IS GOING TO BE KILLED IN ONE OF THESE TRUCKS. THE
9	DEALER REFUSES TO ACKNOWLEDGE THE PROBLEM. TO REPLICATE THE "DEATH
10	WOBBLE", ALL YOU HAVE TO DO IS DRIVE AN 08' SUPER DUTY AT 65-70 MPH ON THE INTERSTATE AND HIT A SLIGHT BUMP OR MINOR POTHOLE, ESPECIALLY IN A SLIGHT
11	TURN, AND YOU WILL LOSE CONTROL AND BE SHAKEN VIOLENTLY UNTIL YOU CAN
12	BRING THE VEHICLE'S SPEED DOWN TO BELOW 40 MILES AN HOUR. I CAN REPLICATE THIS EVERYDAY ON MY WAY TO WORK. IT HAPPENS EVERY DAY, EVERY TIME I GO
13	OVER CERTAIN BUMPS ON THE INTERSTATE. I NOW HAVE TO SLOW TO BELOW 45
13	MILES AN HOUR BEFORE I HIT THE BUMPS TO AVOID AN ACCIDENT. GOING THIS SLOW COULD CAUSE AN ACCIDENT WHERE THE SPEED LIMIT IS 70. THIS REALLY PISSES ME
	OFF. I SPENT ALOT OF HARD EARNED MONEY ON THIS TRUCK TO BE TOLD IT IS A TIRE
15	INFLATION ISSUE WHEN IT IS DEFINITELY MUCH MORE SEVERE. I RELIGIOUSLY CHECK MY AIR PRESSURE. EVEN IF IT WERE LOW, THIS IS UNACCEPTABLE AND SOMETHING
16	MUST BE DONE. THIS PROBLEM DID NOT SURFACE UNTIL AFTER A YEAR OR SO OF
17	DRIVING APPROX 15,000 MILES. <u>SOMETHING IS VERY WRONG, LIVES ARE AT RISK</u> HERE. PLEASE DO SOMETHING. RECALL *TR
18	1 Affected Product
19	
20	July 1, 2014 NHTSA ID NUMBER: 10607347
21	Components: STEERING, SUSPENSION NHTSA ID Number: 10607347
22	Incident Date June 10, 2014 Consumer Location NEW BRAUNFELS, TX
23	Vehicle Identification Number 1FTSW21R38E****
24	Summary of Complaint CRASHYes
25	FIRENo INJURIES0
26	DEATHSO
27	ON MY DAILY COMMUTE TO WORK I EXPERIENCED WHAT I HAVE LATER RESEARCHED TO FIND OUT IS CALLED THE "DEATH WOBBLE". THE FIRST OCCURRENCE HAPPENED
28	WHILE MAINTAINING A SPEED OF APPROXIMATELY 55 MPH WHICH WAS THE SUGGESTED ROAD SPEED LIMIT, AFTER RIDING OVER A SMALL BUMP IN THE ROAD MY
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1	FRONT LEFT END INITIATED INTO A VIOLENT SHAKING SENSATION THAT FELT AS
2	THOUGH I HAD JUST BLOWN A TIRE. AFTER REDUCING MY SPEED ABRUPTLY AND
3	NEARLY BEING REAR ENDED THE FRONT END REGAINED ITS CONTROL AND I CONTINUED AND ARRIVED SAFELY TO WORK AFTER REDUCING MY SPEED TO 45 MPH. I
4	LOOKED IN THE WHEEL HUB AND UNDERNEATH BUT DID NOT SEE ANYTHING OUT OF THE ORDINARY FROM PLANE SIGHT. I EXPERIENCED THE VIOLENT SHAKING ON
5	MULTIPLE OCCASIONS, DIFFERENT LOCATIONS AND FOUND MYSELF EXPERIENCING IT MORE AND MORE AT LOWER SPEEDS AND ON SMALLER ROAD BUMPS/POT HOLES.
6	AFTER DAY 2 I SCHEDULED AN APPOINTMENT FOR 6/30/14 WITH FORD SERVICE TO
7	HAVE THE REPAIR & DIAGNOSES. THE NEXT DAY 6/27/14 WE HAD TO EVACUATE OUR JOB SITE IN LOUISIANA DUE TO EXTREME WEATHER CONDITIONS AND POSSIBLE
8	TORNADOS, ON MY COMMUTE HOME, THE SO CALLED DEATH WOBBLE OCCURRED AGAIN AND THIS TIME RESULTED IN LOOSING CONTROL AND CRASHING INTO A
9	SMALL TREE BECAUSE OF THE VIOLENT SHAKING AND NECESSARY BRAKING TO REGAIN CONTROL. I WAS ABLE TO ESCAPE WITH MINOR DAMAGES TO MY FRONT
10	BUMPER. FORD IS HAVING TO REPLACE MY BALL JOINTS, BEARINGS AND TIE BAR
11	THAT WILL COST WELL OVER \$600 IN REPAIRS EXCLUDING A NEW FRONT BUMPER THAT I CANNOT AFFORD TO FIX. <b>I'M AFRAID THIS COULD RESULT IN A SERIOUS</b>
12	INJURY/FATALITY IF NOT RECALLED AND FIXED. HAD I GONE INTO INCOMING
13	TRAFFIC IT COULD HAVE BEEN MY LIFE OR THEIRS AND I WOULD THINK FORD WOULD BE FULLY RESPONSIBLE. THERE ARE HUNDREDS OF SIMILAR CASES FROM
14	OLDER MODELS AND EVEN NEWER UP TO 2013, MINE IS A F-250 2008.
15	HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER- DUTY/TOHP1M75VBFBFT9IL/P5. *TR
16	1 Affected Product
17	October 24, 2009 NHTSA ID NUMBER: 10289683
18	Components: SUSPENSION, STEERING
19	NHTSA ID Number: 10289683 Incident Date October 21, 2009
20	Consumer Location MURFREESBORO, TN
21	Vehicle Identification Number 1FTSX21578E**** Summary of Complaint
22	CRASHNo FIRENo
23	INJURIES0
24	<b>DEATHS0</b> I HAVE EXPERIENCED AN ISSUE WITH MY 2008 FORD F-250 WHERE I HIT A BUMP ON THE
25	INTERSTATE AND EXPERIENCED THE STEERING WHEEL OSCILLATING AND FRONT END
26	WOBBLING BOTH EXTREMELY DOING 65MPH ANDWAS ALMOST THROWN INTO A SEMI TRUCK TWICE THE SAME NIGHT. I HAD JUST PURCHASED THIS TRUCK BACK IN JULY
27	BUT HAD NOT DROVE IT ON THE INTERSTATE, ACTUALLY I HADN'T DRIVEN IT MUCH
28	AT ALL. IT HAS LOW MILEAGE AND IS ALL FACTORY. I TOOK IT TO THE DEALERSHIP AND THEY TOLD ME THIS HAPPENS ALL THE TIME ALSO THEY STATED THAT FORDS SERVICE RECOMMENDS 751 RS THE PRESSURE AND THAT IS ALL THAT IS WHONC WITH
	SERVICE RECOMMENDS 75LBS TIRE PRESSURE AND THAT IS ALL THAT IS WRONG WITH -112-
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1 2 3 4 5 6 7 8 9	IT. THE TRUCKS STICKERS RECOMMENDATION IS LESS THAN THAT. THE WHEELS ON MY TRUCK ARE STOCK FACTORY AND DO NOT HAVE LOW PRESSURE SENSORS ON THEM. I HAVE RESEARCHED SEVERAL COMPLAINTS ON THE INTERNET ABOUT THIS ISSUES AND OF ACCIDENTS AND INJURIES RESULTING FROM WHAT IS BEING CALLED THE "DEATH WOBBLE". I THINK THIS MATTER SHOULD BE INVESTIGATED AND THE PROBLEM FIXED PROPERLY BY FORD, NOT PATCHED WITH TIRE PRESSURE. I PULL A TRAILER SOMETIMES WITH THIS TRUCK. <b>IF THIS HAPPENED WHILE PULLING ONE I</b> <b>AM SURE I WOULD HAVE BEEN SERIOUSLY INJURED OR KILLED AS IN OTHER</b> <b>CASES I HAVE HEARD ABOUT.</b> I AM SCARED TO DEATH TO DRIVE THIS TRUCK NOW. WHY ISN'T SOMEONE DOING SOMETHING ABOUT THIS. PLEASE HELP US WHO OWN THESE VEHICLES. THE MECHANIC WHO IS A FRIEND OF MINE STATED THAT THIS WILL STILL HAPPEN SOMETIMES EVEN WITH THE INCREASE IN TIRE PRESSURE. *TR <b>1 Affected Product</b>
10 11	February 19, 2018 NHTSA ID NUMBER: 11073630 Components: STEERING NHTSA ID Number: 11073630
12 13	Incident Date February 19, 2018 Consumer Location TYLER, TX Vehicle Identification Number 1FTSW21R28E**** Summary of Complaint
14 15	CRASHNo FIRENo INJURIES0
16 17	<b>DEATHSO</b> <b>DEATHSO</b> VIOLENT SHAKING OF FRONT WHEELS AND STEERING WHEEL AT HIGHWAY SPEED 65- 70MPH AFTER HITTING BUMP IN THE ROAD. I CALLED THE FORD SERVICE DEPT AND
18 19	THEY SAID THEY HAD NEVER HEARD OF THIS PROBLEM! HOWEVER, THERE ARE SO MANY OCCURRENCES THAT A NAME HAS BEEN GIVEN TO THE ISSUE, THE DEATH WOBBLE. IT SEEMS FORD IS IN DENIAL ABOUT THIS PROBLEM, THEY TRY TO BLAME
20 21	TIRE PRESSURE ACCORDING TO ONLINE SOURCES. <b>THERE SHOULD BE A SAFETY</b> <b>RECALL FORCED BY THE NHTSA BEFORE SOMEONE GETS KILLED,</b> IF THEY HAVEN'T ALREADY! I HAD JUST HAD THE TRUCK TIRES ROTATED BALANCED AND AIR PRESSURE CHECKED BEFORE THIS TRIP!
22 23	1 Affected Product
24 25	April 22, 2009 NHTSA ID NUMBER: 10266394 Components: STEERING, SUSPENSION
26	NHTSA ID Number: 10266394 Incident Date February 16, 2009
27	Consumer Location PLEASANTON, CA Vehicle Identification Number 1FDWW37R18E**** Summary of Complaint
28	CRASHNo -113-
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1 2 3 4 5 6 7 8 9 10 11 12	FIRENo INJURIESO DEATHSO OUR BUSINESS OWNS 4 FORD F-350 SUPER DUTY TRUCKS (2-2006 AND 2-2008). ALL OF THEM HAVE A VERY SERIOUS DEFECT THAT CAUSES WHAT OUR EMPLOYEES REFER TO AS THE "DEATH WOBBLE". AT ABOUT 55 MILES PER HOUR, THE FRONT END OF THE TRUCK EXPERIENCES A VIOLENT SHIMMY THAT HAS ALMOST CAUSED A NUMBER OF ACCIDENT. WE TOW LARGE TRAILERS (20'), LOADED WITH LARGE SPOOLS OF COAXIAL CABLE. THESE REELS AND THE TRAILER HAVE A COMBINED WAIT IN EXCESS OF 3000- 4000 LBS., AND THE TRUCKS WEIGH APPROXIMATELY 6,000 LBS. WHEN YOU LOSE CONTROL OF THIS MUCH WEIGHT AT HIGHWAY SPEEDS, <u>IT IS ONLY A MATTER OF</u> <u>TIME BEFORE SOMEONE IS KILLED.</u> ALL FOUR TRUCKS HAVE EXPERIENCED THIS PROBLEM. FORD CLAIMS THAT IF YOU SLOW DOWN, IT WILL GO AWAY, BUT OFTEN THAT CREATES ANOTHER SAFETY HAZARD IN AND OF ITSELF, AND OFTEN YOU CANNOT SLOW DOWN FAST ENOUGH WITH A 4,000LB IN TOW. FORD NEEDS TO ISSUE A RECALL IMMEDIATELY TO CORRECT THIS PROBLEM, INSTEAD OF FORCING CONSUMERS TO BEAR THE COST OF THEIR INEPT MANUFACTURING AND DESIGN. *TR 1 Affected Product	
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	July 29, 2009 NHTSA ID NUMBER: 10278647 Components: STEERING, SUSPENSION NHTSA ID Number: 10278647 Incident Date July 26, 2009 Consumer Location PAMPA, TX Vehicle Identification Number 1FDWX37R08E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I HAVE TWO 2008 FORD F-350 SUPERDUTY 4X4 TRUCKS. ONE TRUCK HAS 39000 MILES AND THE OTHER 61000 MILES. AT HIGHWAY SPEEDS, AFTER HITTING UNEVEN ROAD SURFACE OR BUMPS, THEY BEGIN TO SHIMMY AND SHAKE SO BAD THAT I HAVE TO PULL OVER TO GET IT TO QUIT I HAVE HAD THE TRUCKS IN NUMEROUS TIMES TO FIX BUT THE PROBLEM ALWAYS RETURNS. I RECEIVED NOTICE FROM FORD THAT LOW TIRE PRESSURE CAUSES THIS BUT I MAINTAIN CORRECT TIRE PRESSURE IN BOTH OF MY TRUCKS SO I KNOW THIS IS NOT THE PROBLEM. I HAVE BEEN RESEARCHING THIS ONLINE AND THERE IS A COMPANY CALLED WCMOTORSPORTS THAT CLAIMS TO KNOW WHY THESE TRUCKS ARE DOING THIS AND THE SOLUTION. THEIR WEBSITE IS WWW.SUPERDUTYWOBBLE.COM. THEIR PHONE NUMBER IS (508) 668-8638. THEY SEEM VERY KNOWLEDGEABLE ABOUT THIS ISSUE. THE PROBLEM IS THE REPLACEMENT PART TO FIX THIS IS \$825. I FEEL THAT THIS SHOULD BE A RECALL ISSUE. AFTER LOOKING ONLINE, MANY PEOPLE HAVE THIS PROBLEM. I HAVE NOT MODIFIED THESE TRUCKS IN ANYWAY AND <u>I FEEL THAT TH SONLY A MATTER OF TIME UNTIL THIS CAUSES A FATALITY IF IT HASN'T ALREADY.</u> *TR	*
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1	1 Affected Product
3	March 13, 2010 NHTSA ID NUMBER: 10319436
4	Components: SUSPENSION
	NHTSA ID Number: 10319436 Incident Date March 12, 2010
5	Consumer Location RAYMOND, NH
6	Vehicle Identification Number 1FTWX31508E****
7	Summary of Complaint CRASHNo
8	FIRENO
9	INJURIES0 DEATHS0
	2008 F-350 HAS WHAT THEY CALL THE "DEATH WOBBLE" AND HAS A CONSTANT SHAKE
10	AT HIGHWAY SPEEDS. FORD BLAMED IT ON THE TIRES. I REPLACED TIRES WITH ONE OF THE BEST YOU CAN BUY. CONTINUED TO DO THE SAME THING. FORD BLAMED IT
11	ON THOSE TIRES. BEEN IN FOR SERVICE 5 TIMES IN 1 YEAR. DEALERSHIP TOLD ME NOT
12	TO COME BACK BECAUSE THEY CAN'T FIX IT. FORD TELLS ME TO GO BACK TO THE
13	DEALERSHIP. <u>SOMEDAY I'M GOING TO KILL SOMEONE OR MYSELF IN THIS TRUCK</u> SINCE I HAVE NO CONTROL WHEN THE "DEATH WOBBLE" STARTS UNTIL I CAN
14	SLOW DOWN TO ABOUT 20 MPH ON AN INTERSTATE HIGHWAY. UPDATED IVOQ
15	05/26/10 1 Affected Product
16	2 Associated Documents
17	May 28, 2013 NHTSA ID NUMBER: 10513953
18	Components: SUSPENSION, STEERING
19	NHTSA ID Number: 10513953 Incident Date July 1, 2011
20	Consumer Location ORRVILLE, OH
21	Vehicle Identification Number 1FTWW31RX8E****
22	Summary of Complaint CRASHNo
	FIRENo
23	INJURIES0 DEATHS0
24	REPEATED "DEATH WOBBLE". MANY TIMES, AT HIGHWAY SPEEDS WHEN I HIT A BUMP
25	OR IMPERFECTION IN THE ROAD, THE TRUCK WILL VIOLENTLY SHAKE AND LOOSE
26	STEERING CONTROL. SEEMS TO HAPPEN MORE OFTEN DURING CURVES IN THE ROAD. I HAVE SHOT SIDEWAYS ACROSS SEVERAL LANES OF TRAFFIC ON MORE THAN ONE
27	OCCASION VERY NARROWLY AVOIDING A HIGH SPEED COLLISION. HAPPENS BOTH
28	WHILE PULLING A LOAD OR NOT. DEALERSHIP IS UNWILLING TO HELP. VERY SERIOUS, LIFE THREATENING PROBLEM GOING ON AND I CANNOT BELIEVE FORD IS UNWILLING
20	TO FIX THE PROBLEM. I GUESS THEY WILL WAIT UNTIL SOMEONE DIES FROM THIS
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1	BEFORE THEY WILL ACT. I DON'T THINK IT WILL BE LONG BEFORE SOMEONE IS
2	KILLED FROM THIS LOSE OF STEERING CONTROL! *TR 1 Affected Product
3	
4	March 3, 2010 NHTSA ID NUMBER: 10316308
5	Components: STEERING NHTSA ID Number: 10316308
6	Incident Date January 2, 2009
7	Consumer Location SAN BERNARDINO, CA
8	Vehicle Identification Number 1FTWW33R68E**** Summary of Complaint
Ū.	CRASHNO
9	FIRENo INJURIESO
10	DEATHS0
11	I HAVE A 2008 FORD F-350 DUALLY THAT WHEN HITTING A DIP/BUMP IN THE ROAD AT SPEEDS ABOVE ABOUT 35, THE ENTIRE FRONT END SHAKES/SHIMMYS SO BAD THAT
12	YOU CAN'T EVEN CONTROL IT! I RECEIVED A LETTER IN THE MAIL FROM FORD IN
13	APRIL 2009 BASICALLY SAYING WHEN IT HAPPENS SLOW DOWN. THE DEALER REFUSES
14	TO DO ANYTHING. <u>SOMEONE IS GOING TO GET KILLED IF THIS IS NOT FIXED.</u> *TR 1 Affected Product
15	October 1, 2014 NHTSA ID NUMBER: 10640673
16	Components: SERVICE BRAKES, STEERING, WHEELS
17	NHTSA ID Number: 10640673
18	Incident Date September 22, 2014 Consumer Location JAMESTOWN, TN
19	Vehicle Identification Number 1FTWW33R48E****
20	Summary of Complaint CRASHNo
	FIRENo
21	INJURIES0
22	<b>DEATHS0</b> I WAS DRIVING ON INTERSTATE 75 WHEN THE TRUCK AND STEERING WHEEL STARTED
23	VIBRATING VIOLENTLY, AS I APPLIED THE BRAKES TO SLOW THE VEHICLE IT PULLED
24	SHARP TO THE LEFT TAKING THE VEHICLE ONTO THE MEDIAN. ONCE THE VEHICLE STOPPED, FACING IN THE OPPOSITE DIRECTION I GOT OUT AND CHECKED THE LEFT
25	FRONT WHEEL, IT WAS TOO HOT TO TOUCH. I LET IT COOL AND THEN PROCEEDED TO
26	THE NEAREST EXIT. I HAD THE LEFT FRONT WHEEL INSPECTED, BUT NO PROBLEM WAS DISCOVERED. I CONTINUED ON MY TRIP FROM TENNESSEE TO FLORIDA. ON THE
27	RETURN TRIP THE PROBLEM HAPPENED THREE TIMES, EACH TIME I STOPPED AND LET
	THE WHEEL COOL BEFORE CONTINUING. I RESEARCHED THIS PROBLEM ON THE INTERNET AND FOUND THAT SEVERAL OTHER INDIVIDUALS HAVE EXPERIENCED THE
28	SAME PROBLEM. I BELIEVE THE NTSB SHOULD REQUIRE FORD MOTOR COMPANY
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0	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.117 Page 117 of 353
1 2 3	TO RECALL THESE VEHICLES AND CORRECT THE PROBLEM BEFORE SOMEONE IS INJURED OR KILLED. THERE IS SUFFICIENT DOCUMENTATION ON THE INTERNET TO JUSTIFY THE NTSB TAKING ACTION. *TR 1 Affected Product
4	
5	April 23, 2013 NHTSA ID NUMBER: 10509217 Components: STEERING, SUSPENSION
6	NHTSA ID Number: 10509217
7	Incident Date December 3, 2012 Consumer Location BROCKPORT, NY
8	Vehicle Identification Number N/A
-	Summary of Complaint
9	CRASHNo FIRENo
10	INJURIES0
11	DEATHS0
	THIS TRUCK HAS DEVELOPED THE "DEATH" WOBBLE. IF I HIT A BUMP, BRIDGE JOINT IT
12	WILL SEND THE TRUCK INTO AN INSTANT WOBBLE THAT IS SO VIOLENT YOU HAVE TO SLOW TO ABOUT 20MPH TO STOP IT. VERY DANGEROUS AT HIGHWAY SPEEDS AS YOU
13	CANNOT KEEP LANE CONTROL. ALREADY DESTROYING THE FRONT TIRES AND
14	DEALERS HAVE SAID TO KEEP PROPER AIR PRESSURE. I HAVE BEEN AN AUTO
15	MECHANIC FOR OVER 15 YRS NOW AND THAT IS THE BEST EXCUSE THE DEALER HAS. FORD KNOWS THERE IS A PROBLEM BUT SAID THERE IS NOT ENOUGH COMPLAINTS. I
	HAVE DONE A SEARCH AND CAME UP WITH OVER 18,000 HITS ON GOOGLE FOR THIS
16	TOPIC ALONE. PLEASE ASSIST WITH KEEPING US SAFE AND DEMAND A FIX AND
17	RECALL BEFORE PEOPLE ARE KILLED DRIVING OR EVEN BEING NEAR THIS
18	VEHICLE. *TR 1 Affected Product
19	
20	October 19, 2013 NHTSA ID NUMBER: 10548528
21	Components: SUSPENSION, WHEELS, STEERING NHTSA ID Number: 10548528
22	Incident Date October 10, 2012
	Consumer Location Unknown
23	Vehicle Identification Number N/A
24	Summary of Complaint CRASHNo
25	FIRENo
	INJURIES0
26	<b>DEATHS0</b> I'M A LIFE TIME FORD TRUCK OWNER AND HAVE NEVER BEEN SO DISAPPOINTED IN MY
27	LIFE AND READY TO PURCHASE FROM A COMPETITOR. THE TITLE "DEATH WOBBLE"
28	IS VERY TRUE AND FORD REALLY NEEDS TO PAY ATTENTION BECAUSE IT WILL
	COST SOMEONE THEIR LIFE. IF I WASN'T 65 YEARS OLD AND AN EXPERIENCED
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1 2 3 4 5 6	DRIVER THE MULTIPLE TIMES I'VE EXPERIENCED THIS COULD HAVE KILLED ME. I HAVE REPLACED EVERYTHING INVOLVING THE SUSPENSION, TIRES, STRUTS, RODS, HAVING MULTIPLE ALIGNMENTS, ETC AND NOTHING HAS FIXED THIS MESS. FORD NEEDS TO FIX THIS. I'M WILLING TO BE PART OF A CLASS ACTION LAWSUIT AGAINST THEM FOR THE LEMONS/DEATH TRAPS THEY'RE PRODUCING & SELLING. FORD IS AWARE OF THIS PROBLEM AND REFUSES TO DO ANYTHING ABOUT IT. THEY SWITCHED FROM LEAF SPRINGS TO THIS HORRIBLE DESIGN STARTING WITH 2008 MODELS TO PRESENT. *TR 1 Affected Product
7 8 9 10 11 12	April 2, 2014 NHTSA ID NUMBER: 10576804 Components: SUSPENSION, STEERING NHTSA ID Number: 10576804 Incident Date April 1, 2014 Consumer Location POTTSTOWN, PA Vehicle Identification Number N/A Summary of Complaint CRASHNo
13 14 15 16 17 18 19 20 21	FIRENO INJURIESO DEATHSO I OWN A 2009 FORD F250 SUPER DUTY 4X4 AFTER HITTING A SMALL BUMP IN THE RD. AT 50 MPH THE WHOLE CAB OF MY TRUCK, THE STEERING WHEEL AND THE TIRES STARTED SHAKING VIOLENTLY!!!!!!!!! BACK AND FORTH. THE TRUCK VEERED IN TO THE OPPOSITE LANE. I HAD TO SLAM ON THE BRAKES TO SLOW THE TRUCK DOWN TO REGAIN CONTROL. I TRULY THOUGHT THAT I WAS GOING TO LOSE CONTROL AND CRASH.WHY HAS FORD NOT RECALLED THE TRUCKS TO FIX THE PROBLEM.WHY WHEN I BOUGHT THE TRUCK WAS I NOT TOLD THAT THERE IS AN ONGOING INVESTIGATION INTO THIS DEFECT AND IT HAS BEEN GOING ON SINCE 2005. <u>MUST SOMEONE DIE</u> <u>BEFORE FORD IS MADE TO CORRECT THIS EXTREMELY DANGEROUS DEFECT.</u> <u>PLEASE INFORM ME OF OUTCOME OF THIS INVESTIGATION.</u> THANK YOU. *TR 1 Affected Product
22 23 24 25 26 27 28	January 5, 2012 NHTSA ID NUMBER: 10442582 Components: STEERING, SUSPENSION NHTSA ID Number: 10442582 Incident Date November 20, 2011 Consumer Location TAMASSEE, SC Vehicle Identification Number 1FTWW31R39E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0
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0	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.119 Page 119 of 353
1 2 3 4 5 6 7 8 9	WHEN MY TRUCK IS DRIVEN OVER A POTHOLE, ONTO A BRIDGE, OR ANY CHANGE IN ELEVATION IN THE DRIVING SURFACE, THE VEHICLE WILL SHAKE VIOLENTLY. THE SHAKING IS SO VIOLENT THE VEHICLE MUST BE STOPPED TO AVOID LOSING CONTROL. IT FEELS AS IF THE FRONT END WILL LITERALLY COME APART. THIS BEGAN NEAR THE END OF NOVEMBER AND HAS CONTINUED TO GET WORSE AND HAPPEN MORE FREQUENTLY. I HAVE CONTACTED FORD MOTOR COMPANY AND WAS TOLD THERE IS NO RECALL AND TO KEEP RECORDS OF MY REPAIRS IF THERE EVER IS ONE. THE PROBLEM IS THE TRACK BAR AND THE COST TO FIX THIS "DEATH WOBBLE" IS APPROXIMATELY 1200 DOLLARS PARTS AND LABOR. I NOW HAVE A 50,000 DOLLAR TRUCK THAT IS NOT SAFE FOR MY FAMILY TO RIDE IN. <u>THIS PROBLEM WILL</u> <u>CERTAINLY CAUSE FATALITIES IF IT HASN'T ALREADY. I AM A CDL DRIVER AND IF</u> I CAN'T CONTROL THE VEHICLE THEN I DOUBT ANYONE ELSE CAN EITHER. *TR 1 Affected Product
10	Lanuary 11, 2015 NHTSA ID NUMBED, 10/71/55
11	January 11, 2015 NHTSA ID NUMBER: 10671655 Components: SUSPENSION, STEERING, WHEELS
12	NHTSA ID Number: 10671655 Incident Date November 27, 2014
12	Consumer Location LEANDER, TX
	Vehicle Identification Number 1FTWW31R89E**** Summary of Complaint
14	CRASHNo
15	FIRENo INJURIES0
16	DEATHS0
17	HIT ROAD BUMP & THE 'DEATH WOBBLE' OCCURRED CAUSING THE TRUCK TO SHAKE
18	UNCONTROLLABLY & FORCE US TO THE SIDE OF THE ROAD. I TOOK IT TO FORD DEALERSHIP & THEY QUOTED ME OVER \$7K TO FIX VIRTUALLY EVERYTHING
19	SUSPENSION RELATED. I TOOK IT 2 LOCAL DIESEL MECHANICS WHO EVENTUALLY
20	FIXED IT AFTER REPLACING APX \$700 IN PARTS. THE PART THAT FIXED IT WAS THE TRACK BAR BALL JOINT & TRACK BAR BUSHING. IN SEARCHING ONLINE AMONGST
	FORD ENTHUSIAST AS WELL AS OTHER DIESEL TRUCK OWNERS <u>THIS IS A SCARY,</u>
21	DANGEROUS & SOMEWHAT COMMON PROBLEM. FORDS RESPONSE IN A LOT OF INSTANCES IS THAT TIRE PRESSURE, TIRE WEAR, ETC IS THEIR COMMON RESPONSE.
22	ALL I KNOW IS WITH AS MANY GUYS THAT I'VE SEEN HAD THIS, THIS IS A DESIGN
23	FLAW THAT IS DANGEROUS. IF SOMEONE HASN'T BEEN KILLED BECAUSE OF THIS
24	ALREADY, I'D BE SHOCKED. *TR 1 Affected Product
25	
26	July 24, 2013 NHTSA ID NUMBER: 10531702
27	Components: STEERING, SUSPENSION
	NHTSA ID Number: 10531702
28	Incident Date July 22, 2013 Consumer Location PELHAM, NH
	-119-
	Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.120 Page 120 of 353
1	Vehicle Identification Number N/A
2	Summary of Complaint CRASHNo
3	FIRENo
_	INJURIES0
4 5	<b>DEATHS0</b> I JUST BOUGHT THIS VEHICLE AND WAS DRIVING THE HIGHWAY AT 65 MPH. I WENT
6	OVER THE EXPANSION JOINT ON A BRIDGE AND LOST CONTROL OF THE VEHICLE. IT JUMPED INTO THE NEXT LANE. THANK GOD NO ONE WAS IN THE OTHER LANE AND NO
7	ONE GOT HURT. MY FAMILY AND OTHERS COULD HAVE BEEN KILLED. THE
8	DEALERSHIP SAID THE STEERING DAMPER WAS BAD. I'M SORRY BUT A BAD STEERING DAMPER WHEN YOU ARE TRAVELING 65 MPH OVER A SMALL BUMP SHOULD NOT
9	MAKE YOUR VEHICLE JUMP INTO THE NEXT LANE AND LOOSE CONTROL. THIS MUST BE FIXED BY FORD. I AM READING THAT OTHER PEOPLE HAVE HAD TO HAVE ALL OF
10	THE FRONT END PARTS REPLACED AND THEN THE PROBLEM RETURNS AGAIN. WHAT IS THE NHTSA DOING ABOUT THIS? DO NOT HAVE VIN AT THIS TIME MY TRUCK IS AT THE
11	DEALERS. *TR
12	1 Affected Product
13	January 13, 2014 NHTSA ID NUMBER: 10559662
14	Components: STEERING, SUSPENSION
15	NHTSA ID Number: 10559662
	Incident Date January 25, 2013 Consumer Location DEER PARK, TX
16	Vehicle Identification Number 1FTSW2BR5AE****
17	Summary of Complaint CRASHNo
18	FIRENo
19	INJURIES0 DEATHS0
20	AT 65 MPH, HIT UNEVEN ROAD, FRONT END WOBBLED DRAMATICALLY !!!!!!!! TRUCK
21	WENT OUT OF CONTROL & HAD TO REDUCE SPEED TO BELOW 40 MPH TO REGAIN
21	CONTROL. CONTINUES TO HAPPEN ALL THE TIME NOW AT OVER 55 MPH AND HITTING A BUMP. NEW TIRES ALL THE WAY AROUND, ALL TIRE PRESSURE MAINTAINED
23	PROPERLY AT 62 TO 65 PSI THIS IS A SAFETY CONCERN AND IS DEFINITELY A FLAWED DESIGNED THAT FORD IS WELL AWARE OF AND REFUSE TO
	ACKNOWLEDGE. DOES SOMEONE HAVE TO DIE TO GET THEIR ATTENTION ?????
24 25	*TR 1 Affected Product
26	Langer C 2015 NUTERA ID NUMBER 10/70711
20	January 6, 2015 NHTSA ID NUMBER: 10670511 Components: STEERING
	NHTSA ID Number: 10670511 Incident Date September 17, 2014
28	Consumer Location GARDEN RIDGE, TX
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	Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.121 Page 121 of 353
1	Vehicle Identification Number 1FTSW2BRXAE**** Summary of Complaint CRASHNo
-	FIRENo
	INJURIES0
4	DEATHS0 AT VARIOUS SPEEDS FROM 45 ON UP FRONTEND WILL SHAKE VIOLENTLY CAUSING
5 6	VEHICLE TO LOSS LANE CONTROL. MOST OFTEN IT IS FOLLOWING ANY COMPROMISE IN THE ROAD BUT HAS HAPPENED WITHOUT ME FEELING OR SEEING ANY CHANGE IN
7	THE SURFACE. WHEN I WENT TO MY LOCAL FORD DEALER, THEY QUICKLY IDENTIFIED THE PROBLEM CALLING IT THE €œDEATH WOBBLE€•. ALARMED BY THE NAME
8	ALONE I ENQUIRED. THEY SAID THEY KNOW OF THE PROBLEM AND THAT FORD IS NOT
9	TAKING RESPONSIBILITY FOR IT. THEY ONLY OFFER THE CONSUMER TO PAY OUT OF POCKET FOR AFTERMARKET PART TO RECTIFY THEIR ILL ENGINEERED FRONTEND.
10	THIS IS A SERIOUS OCCURRENCE AND WILL END UP CAUSING MANY WRECKS AND THE
10	GREAT POTENTIAL FOR FATALITIES. I SEE FORD AND WHOEVER ELSE TURNS A BLIND EYE TO THIS SITUATION TO BE IN THE HEADLINES RIGHT NEXT TO GM AND THEIR
	ATTEMPT TO PRETEND AND BURY ISSUES KNOWING THEY PRESENT A COMPROMISE IN SAFETY. <b>THERE IS A COUNTLESS NUMBER OF PEOPLE WHO HAVE DONE THEIR</b>
12	PART TO NOTIFY BOTH FORD AND NHTSA OF THIS ONGOING ISSUE FOR YEARS AND
13	<b>BOTH SEEM NEGLIGENT NOT TO AGGRESSIVELY REMEDY ANY AND ALL CURRENT</b> <b>VEHICLES WITH THIS DEFECT, AS WELL AS, ANY UNIT IN PRODUCTION. IT</b>
14	SHOULDN€™T TAKE BLOODSHED/DEATH FOR SOMEONE TO TAKE OWNERSHIP OF
15	THEIR DEFECTIVE PRODUCT. 1 Affected Product
16	
17	February 25, 2016 NHTSA ID NUMBER: 10838463
18	Components: WHEELS, UNKNOWN OR OTHER, STEERING
19	NHTSA ID Number: 10838463
20	Incident Date February 25, 2016 Consumer Location BALTIMORE, MD
20	Vehicle Identification Number 1FTSW2B55AE****
21	Summary of Complaint
22	CRASHNo
22	FIRENo INJURIES0
23	DEATHSO
24	WHILE DRIVING MY 2010 FORD F250 SUPER DUTY ON THE HIGHWAY I DROVE OVER A
25	BUMP IN THE ROAD. THE TRUCK BEGAN TO SHAKE VIOLENTLY. IT FELT LIKE IT WAS GOING TO FALL APART WHILE STILL IN MOTION. I TRIED TO HIT THE BRAKE BUT THAT
26	SEEMED TO EXACERBATE THE PROBLEM. I TRIED TO ADJUST THE STEERING WHEEL IN
27	HOPES TO ALIGN SOME DEFUNCT COMPONENT. NOTHING SEEMED TO HELP EXCEPT TO LET OFF THE GAS AND ATTEMPT TO CONTROL THE VEHICLE AND AVOID A
27 28	HOPES TO ALIGN SOME DEFUNCT COMPONENT. NOTHING SEEMED TO HELP EXCEPT
	HOPES TO ALIGN SOME DEFUNCT COMPONENT. NOTHING SEEMED TO HELP EXCEPT TO LET OFF THE GAS AND ATTEMPT TO CONTROL THE VEHICLE AND AVOID A

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1 2	ALL I COULD DO TO MAINTAIN A SAFE DISTANCE AROUND ME SO NOT TO COLLIDE WITH OTHER DRIVERS.
3	September 10, 2015 NHTSA ID NUMBER: 10763032
4	Components: STEERING, WHEELS, SUSPENSION
5	NHTSA ID Number: 10763032
6	Incident Date October 20, 2012 Consumer Location MEMPHIS, TN
	Vehicle Identification Number 1FTWW3DR6AE****
7	Summary of Complaint CRASHNo
8	FIRENo
9	INJURIES0
10	<b>DEATHS0</b> LOSS OF CONTROL WHEN DRIVING ON BUMPY SECTION OF FREEWAY, DUE TO
11	EXTREME SHAKING OF FRONT END. IT SEEM TO AMPLIFY IN THE SEVERITY AND
	VIOLENCE OF THE SHAKING UNTIL I WAS ABLE TO SLOW THE TRUCK TO UNDER 10
12	MILES AN HOUR ON THE SHOULDER OF THE ROAD TO REGAIN CONTROL. I HAVE HAD THE TRUCK IN SHOP AT THE DEALER 3 TO 4 TIMES FOR REPAIR FOR THIS RECURRING
13	PROBLEM. THE FORD SERVICE TECHNICIAN ADMITTED THAT THIS WAS A COMMON
14	PROBLEM FOR THIS MAKE AND MODEL BUT THAT NEITHER FORD OR THE DEALER
15	WOULD TAKE RESPONSIBILITY FOR THE REPAIR. BUT, THEY DID HOWEVER HAVE A RECOMMENDED FIX, WHICH I FOUND INTERESTING FOR AN ISSUE THAT THEY SAID
	DIDN'T EXIST. I HAVE SPENT THOUSANDS OF DOLLARS AT THE DEALER TO FIX WHAT
16	IS OBVIOUSLY A DESIGN AND MANUFACTURING FLAW. THIS IS A VERY DANGEROUS
17	VEHICLE TO DRIVE. WE BOUGHT IT TO PULL A LARGE TRAVEL TRAILER BUT DO NOT HAVE CONFIDENCE IN THE TRUCK TO DO SO. SO NOT ONLY ARE WE PAYING FOR A
18	DEFECTIVE TRUCK, WE ARE NOT ABLE TO USE THE TRUCK FOR THE PURPOSE WE
19	INTENDED. WE COULD NOT BE MORE DISAPPOINTED IN FORD AND OUR DEALER.
20	THESE TRUCKS WILL CAUSE FATAL CRASHES, THEY ARE NOT SAFE TO DRIVE. I CAN SEND VIDEO FROM THE CAB OF THE SHAKING THAT HAPPENED OVER THE
	WEEKEND. PLEASE, PLEASE TAKE ACTION TO GET THIS ISSUE FIXED. THANK YOU *TR
21	1 Affected Product
22	
23	March 29, 2017 NHTSA ID NUMBER: 10969398
24	Components: STEERING, SUSPENSION
25	NHTSA ID Number: 10969398 Incident Date February 13, 2017
	Consumer Location JAY, FL
26	Vehicle Identification Number 1FTWW3DR3AE****
27	Summary of Complaint CRASHNo
28	FIRENo
	INJURIES0
	-122- Class Action Complaint
	Case No.

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.123 Page 123 of 353
1 2 3 4 5 6 7 8	DEATHS0 2010 FORDF350 SUPER DUTY, 127,000 MILES. I HAVE THE DREADED "FORD DEATH WOBBLE", I'VE CONTACTED FORD ALL THE WAY TO CORPORATE. FORD'S RESPONSE IS WE'RE NOT AWARE IF ANY ISSUES, AND THERE IS NO RECALL ON YOUR VEHICLE. MY WIFE WON'T RIDE IN THE CAR, THAT'S HOW COOLANT THE SHAKE IS. I'VE CONTACTED FORD BOTH IN WRITING AND VERBALLY, THERE ANSWER IS OUT OF WARRANTY, YOUR PROBLEM MN. THEY ARE AWARE IF THE PROBLEM AS IT IS ALL OVER THE INTERNET. THEIR ANSWER IS YOU CAN'T BELIEVE THE INTERNET. I GUESS THEY'LL TAKE OWNERSHIP WHEN SOMEONE IS KILLED. OF COURSE IN A DEADLY CRASH, THE EVIDENCE/CAUSE OF CRASH WILL BE DESTROYED, HOW FOURTINANT FOR FORD. 1 Affected Product
9	October 2, 2011 NHTSA ID NUMBER: 10428198
10	Components: STEERING, SUSPENSION NHTSA ID Number: 10428198
11	Incident Date September 27, 2011
12	Consumer Location CUTLER BAY, FL Vehicle Identification Number 1FT7W2BT0BE****
13	Summary of Complaint CRASHNo
14	FIRENo
15	INJURIES0
16	<b>DEATHS0</b> THESE TRUCKS SHAKE VIOLENTLY IN THE FRONT END WHEN THEY ENCOUNTER EVEN
17	THE SMALLEST OF BUMPS IN THE ROAD. FORD HAS FAILED TO TAKE THE RESPONSIBLE
18	AND CORRECTIVE MATTERS TO FIX THE PROBLEMS. <u>SOMETHING MUST BE DONE</u> <u>BEFORE SOMEONE GET KILLED.</u> PLEASE SEE FORDFORUM.ORG TO SEE THAT MANY
19	OTHERS ARE HAVING THE SAME ISSUES. *TR 1 Affected Product
20	
21	January 25, 2012 NHTSA ID NUMBER: 10445217
22	Components: SUSPENSION, STEERING
23	NHTSA ID Number: 10445217 Incident Date January 20, 2012
24	Consumer Location ROCHESTER HILLS, MI
25	Vehicle Identification Number 1FT7W2B60BE**** Summary of Complaint
26	CRASHNo
	FIRENo INJURIES0
27	DEATHSO
28	I WAS DRIVING ON A ENTRANCE RAMP TO AN INTERSTATE AT ABOUT 55-60MPH I RECALL HITTING SOME TYPE OF ROAD BUMPS - PAVEMENT JOINT THAT STARTED THE
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	Class Action Complaint Case No.

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1	EVENT TYPICALLY I'M USED TO EXPERIENCING THE BACK OF MY TRUCK BOUNCE IN	
2	THE PAST CAUSING LANE CORRECTION BUT THIS TIME THE WHOLE FRONT END	
3	STARTED SHAKING SEVERELY I WAS IN THE LEFT LANE OF 3 SO DECIDED TO BREAK AND GET INTO THE CENTER MEDIAN ASAP BASED ON APPROACHING VEHICLES FROM BEHIND I PULLED OFF AND CHECKED THE LEFT SIDE AND THE RIGHT ALL WAS	
4	FINE I SHOOK THE WHEELS ALL TIGHT THE SHAKING OF THE VEHICLE WAS SO	
5	SEVERE I HAD A HARD TIME CONTROLLING IT AND GETTING IT SAFELY OFF THE ROADWAY PAPERS IN MY VISORS SHOOK LOOSE 2 GYM BAGS IN PASSENGER SEAT	
6	ENDED UP ON FLOOR A LARGE SCREEN TV THAT WAS TAPED AGAINST THE BACK	
7	WINDOW ON THE BACK SEAT WAS THUS SHIFTED LAYING NOW ON TOP OF THE FRONT SEATS I LATER REALIZED THAT THE SANDWICH I JUST BOUGHT WAS GONE FROM	
8	THE CONSOLE AND LATER FOUND ON THE FLOOR AT THE PASSENGERS DOOR !!!! BEING	
9	COMMITTED TO THE FREEWAY I SLOWLY STARTED OUT, AND NO OTHER ISSUES AFTER ABOUT 20 MINUTES ON THE FREEWAY I KICKED IT UP TO FREEWAY SPEEDS,	
9 10	BUT GOT THE PUCKER FACTOR EACH TIME I HIT ROAD BUMPS ON MY TRIP I WORK FOR THE CITY OF ROCHESTER HILLS AND CALLED OUR FLEET MGR, AND TOLD HIM OF	
11	MY ISSUE, HE HAD NO IDEA BUT CHECKED AND FOUND TSB 11-6-14 THAT WAS	
12	VERBATIM WHAT HAPPENED TO ME THE DEALER ORDERED UP PARTS AND WILL ADVISE WHEN TO BRING IT IN BUT FORD CORP I FELT SHOULD HAVE NOTIFIED OF A	
	POSSIBLE ROLL OVER ISSUE, <u>AS IM SURE IF I WAS AT 70-80 ON THE FREEWAY OR MY</u>	
13	KIDS DRIVING WITH LESS EXPERIENCE THERE WOULD HAVE BEEN A ROLLOVER	
14	FORD SAID UNTIL IT HAPPENS AGAIN OR THE DEALER CAN NOT FIX IT THERE WAS NOTHING MORE THEY COULD DO!!!!! I ADVISED IT LOOKS LIKE THE NEXT CALL	
15	THEY WANT IS FROM LEGAL COUNCIL ADDING THE 0000 AFTER A FATALITY !!! *TR	
16	1 Affected Product	
17		Ì
18	February 5, 2012 NHTSA ID NUMBER: 10446711	
	Components: SUSPENSION, STEERING NHTSA ID Number: 10446711	
19	Incident Date December 15, 2011	
20	Consumer Location SAINT CHARLES, MO Vehicle Identification Number 1FT7W2BT1BE****	
21	Summary of Complaint	
22	CRASHNo FIRENo	
23	INJURIES0	
24	<b>DEATHS0</b> I WAS DRIVING ON HIGHWAY 55 NORTH IN IMPERIAL MISSOURI WITH MY 3 YR OLD	
25	SON IN REAR CAR SEAT WHEN I WENT OVER SOME NORMAL ROAD BUMP AND MY FRONT END STARTED SHAKING SO VIOLENTLY THAT I HAD TO COME TO A COMPLETE	
26	STOP TO CORRECT THE SHAKE. THIS ALL HAPPENED IN THE FAST LANE AS I HAD NO	
27	WAY TO MOVE TO LEFT OR RIGHT. THANK GOD I WAS NOT BEING TAILGATED! I WAS SCARED HALF TO DEATH AND MY 3YR OLD WAS CRYING SO HARD THAT HE COULDN'T	
28	BREATHE! I TOOK IT STRAIGHT TO DEALERSHIP AND THEY DID A TSB FOR A STEERING DAMPENER AND TOLD ME IT WAS FIXED. THE VERY NEXT MORNING IT DID THE	
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	Class Action Complaint	Î
	Case No.	

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1 2 3 4 5 6	VIOLENT SHAKE AGAIN. TOOK IT STRAIGHT BACK TO DEALERSHIP AND THEY HAD A FORD ENGINEER LOOK AT IT AND THEY REPLACED A TRACK BAR BALL JOINT AND SAID IT WAS GOOD NOW. I TOLD THEM THAT I WANTED TO TEST DRIVE IT BEFORE I TOOK IT THIS TIME AND THEY LET ME. STILL HAD THE PROBLEM AND WHEN I TOLD HIM THAT HE SAID THAT THE ENGINEER SAID I NEEDED TO PUT NEW TIRES ON AND A ALIGNMENT BEFORE THEY DO ANYTHING ELSE. THERE IS SOMETHING MORE THAN TIRES AND ALIGNMENT WRONG WITH MY TRUCK!!!!! <u>MY FAMILY TRUCK HAS</u> BECOME A DEATH TRAP!!!! PLEASE HELP WITH THIS MATTER BEFORE SOMEONE IS KILLED! IF THIS WAS YOUR CHILD IN THIS TRUCK YOU WOULD UNDERSTAND MY CONCERN!!! *TR
7 8	1 Affected Product
	November 12, 2012 NUTSA ID NUMBED, 10552002
9 10	November 13, 2013 NHTSA ID NUMBER: 10552092 Components: SUSPENSION NHTSA ID Number: 10552092
11	Incident Date November 4, 2013
12	Consumer Location DALLAS, TX Vehicle Identification Number 1FT7W2BT5BE****
12	Summary of Complaint
13	CRASHNo FIRENo
	INJURIES0
15	DEATHSO AS I WAS DRIVING ON THE HIGHWAY AT HIGHWAY SPEED, ALL OF THE SUDDEN AFTER
16	GOING OVER A ROUGH PATCH OF ROAD, I EXPERIENCED A SEVERE RATTLING AND
17	LOSS OF CONTROL. I HAD TO COME TO A COMPLETE STOP ON THE HIGHWAY AND NEARLY CAUSED A MULTIPLE CAR PILE UP. A WEEK LATER, I HAD THE SAME THING.
18	THIS TIME AS I WAS APPROACHING HIGHWAY SPEED GETTING ON TO THE
19	HIGHWAY. AFTER COMING TO A COMPLETE STOP, THIS CAUSED ANOTHER ACCIDENT ON THAT HIGHWAY THAT I WAS NOT INVOLVED IN BUT WAS A DIRECT
20	<b>RESULT OF MY HAVING TO SLOW TO A STOP DUE TO THIS INCIDENT. AFTER THIS, I</b>
21	LOOKED ONLINE AND IT APPEARS THAT THIS HAS BEEN A PROBLEM WITH FORD SUPER DUTY TRUCKS SINCE 2006 AND HAS CAUSED MORE THAN ONE ACCIDENT
22	AND POSSIBLE FATALITIES. THIS IS A FAIRLY COMMON PROBLEM AS WELL. THE
23	TRUCK IS LESS THAN 3 YEARS OLD, AND HAS LESS THAN 36,000 MILES ON IT. *TR 1 Affected Product
24	
	August 12, 2015 NHTSA ID NUMBER: 10748019
25	Components: SUSPENSION, UNKNOWN OR OTHER, STEERING
26	NHTSA ID Number: 10748019
27	Incident Date June 17, 2015 Consumer Location WINDSOR, PA
28	Vehicle Identification Number 1FT7X2B62BE****
	Summary of Complaint
	-125- Class Action Complaint
	Case No.

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CRASHNo			
FIRENo			
INJURIES0			
DEATHSO	RSTATE AND WENT OVER A SEA	PARATION CR.	
	RONT AXLE / SUSPENSION STAF		
VIOLENTLY / SHAKING UNCO	ONTROLLABLY. I STARTED TO	PUT A SECURI	E HOLD ON TH
	HE SAME TIME APPLYING THE		
	E TRUCK STARTED TO SMOOTI AY, CHECKED THE TRUCK OUT	,	
	REDUCED SPEED TO HOME ANI	,	
	IG. PRIOR TO THAT INCIDENT, I		,
	DUGHT WAS A ROUGH RIDE, WE A RIDE, AND HE SAID IT RIDES		
	DENT, I DECIDED TO CHECK TH		,
	T THAT IT WAS NOT WORKING T D IT WAS A LITTLE BAD, AND T		
	E RIGHT SHOCK, AND THEY DID		
	N STATED THAT I WAS TOLD TH S SHOULD ALSO BE REPLACED		
,	D AGREE TO REPLACE THE RIG		,
	I TO RIDE BETTER. HOW EVER (		
	ANOTHER EPISODE ON A DIFFE		
	ON'T THINK THAT SHOCKS ARE		
	<u>DIFFERENT WEATHER CONDI</u> ANY PEOPLE!!! SO WHO IS TO		
1 Affected Product			<u>tor mil</u> . ;
November 10, 2015 NHTSA ID N			
Common on tax STEEDING SUC	PENSION. WHEELS		
Components: STEERING, SUS			
<b>NHTSA ID Number:</b> 10789577			
NHTSA ID Number: 10789577 Incident Date July 1, 2015			
<b>NHTSA ID Number:</b> 10789577	AS VALLEY, OR		
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint	AS VALLEY, OR		
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo	AS VALLEY, OR		
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo	AS VALLEY, OR		
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIES0	AS VALLEY, OR		
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0	AS VALLEY, OR FT7W2BT2BE****		
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO WE HAVE A 2011 FORD F250 S	AS VALLEY, OR FT7W2BT2BE**** SUPER DUTY DIESEL PICK UP W		
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WE HAVE A 2011 FORD F250 S MILES. IT IS LIKE NEW, BUT H	AS VALLEY, OR IFT7W2BT2BE**** SUPER DUTY DIESEL PICK UP W HAS DEVELOPED A SERIOUS MI	ECHANICAL D	EFECT. FORD
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WE HAVE A 2011 FORD F250 S MILES. IT IS LIKE NEW, BUT H MOTOR COMPANY HAS TRI	AS VALLEY, OR FT7W2BT2BE**** SUPER DUTY DIESEL PICK UP W HAS DEVELOPED A SERIOUS MI IED UP TO (11) ELEVEN FIXES	ECHANICAL D F <b>OR THIS LIF</b>	EFECT. <u>FORD</u> E
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO WE HAVE A 2011 FORD F250 S MILES. IT IS LIKE NEW, BUT H MOTOR COMPANY HAS TRI THREATENING PROBLEM W THIS PICK UP. NOW SINCE T	AS VALLEY, OR FT7W2BT2BE**** SUPER DUTY DIESEL PICK UP W HAS DEVELOPED A SERIOUS MI IED UP TO (11) ELEVEN FIXES I VITH NO SUCCESS. NONE OF T HE PICK UP IS OLDER THAN 3 Y	ECHANICAL D F <b>OR THIS LIF</b> HESE ''FIXES 'RS. EVEN WIT	EFECT. <u>FORD</u> <u>E</u> <u>" APPLY ON</u> TH SUCH LOW
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO WE HAVE A 2011 FORD F250 S MILES. IT IS LIKE NEW, BUT H MOTOR COMPANY HAS TRI THREATENING PROBLEM W THIS PICK UP. NOW SINCE T	AS VALLEY, OR IFT7W2BT2BE**** SUPER DUTY DIESEL PICK UP W HAS DEVELOPED A SERIOUS MI IED UP TO (11) ELEVEN FIXES I VITH NO SUCCESS. NONE OF T HE PICK UP IS OLDER THAN 3 Y O PAY FOR "TRYING" OUT MORE	ECHANICAL D F <b>OR THIS LIF</b> HESE ''FIXES 'RS. EVEN WIT	EFECT. <u>FORD</u> <u>E</u> <u>" APPLY ON</u> TH SUCH LOW
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO WE HAVE A 2011 FORD F250 S MILES. IT IS LIKE NEW, BUT F MOTOR COMPANY HAS TRI THREATENING PROBLEM W THIS PICK UP. NOW SINCE T MILEAGE THEY WANT US TO	AS VALLEY, OR FT7W2BT2BE**** SUPER DUTY DIESEL PICK UP W HAS DEVELOPED A SERIOUS MI IED UP TO (11) ELEVEN FIXES I VITH NO SUCCESS. NONE OF T HE PICK UP IS OLDER THAN 3 Y	ECHANICAL D F <b>OR THIS LIF</b> HESE ''FIXES 'RS. EVEN WIT	EFECT. <u>FORD</u> <u>E</u> <u>" APPLY ON</u> TH SUCH LOW
NHTSA ID Number: 10789577 Incident Date July 1, 2015 Consumer Location CHRISTMA Vehicle Identification Number 1 Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO WE HAVE A 2011 FORD F250 S MILES. IT IS LIKE NEW, BUT H MOTOR COMPANY HAS TRI THREATENING PROBLEM W THIS PICK UP. NOW SINCE T	AS VALLEY, OR IFT7W2BT2BE**** SUPER DUTY DIESEL PICK UP W HAS DEVELOPED A SERIOUS MI IED UP TO (11) ELEVEN FIXES I VITH NO SUCCESS. NONE OF T HE PICK UP IS OLDER THAN 3 Y O PAY FOR "TRYING" OUT MORE	ECHANICAL D F <b>OR THIS LIF</b> HESE ''FIXES 'RS. EVEN WIT	EFECT. <u>FORD</u> <u>E</u> <u>" APPLY ON</u> TH SUCH LOW

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1 2 3 4 5 6 7 8 9 10 11	HAVE CURRENTLY BEEN UNSUCCESSFUL FOR ALL THESE FORD F250 & F350 PICK UPS. THIS SHOULD BE AT THE FORD MOTOR COMPANY'S EXPENSE. THE BOTTOM LINE, IT SHOULD BE BOUGHT BACK BY FORD SINCE IT IS NOT YET PROVEN TO BE FIXABLE. PROBLEM: THE "DEATH WOBBLE" AS DESCRIBED ON THE INTERNET. THIS OCCURS ANYTIME THESE FORD SUPER DUTY F250 OR F350 DIESEL PICKUPS ARE DRIVEN OVER 40MPH AND A BUMP, ROUGH ROAD, OR POTHOLE IN THE ROAD IS HIT. THE OPERATOR LOOSES CONTROL OF THE VEHICLE. THE FIRST TIME THIS HAPPENED, THE PICKUP WAS PULLED INTO THE ON-COMING TRAFFIC. IT TOOK ALL MY SON'S STRENGTH TO GAIN SOME CONTROL AND KEEP FROM HITTING AN ONCOMING SEMI-TRUCK. THIS VEHICLE IS WORSE THAN THE INTERNET VIDEO AS CONFIRMED BY THE BEND OREGON FORD DEALERSHIP. APPLYING THE BRAKES MAKES IT WORSE. IT HAS TO BE ALLOWED TO SLOW DOWN ON ITS OWN. THE VIBRATION IS SO VIOLENT IT TAKES ALL ONES STRENGTH TO KEEP IT ON THE ROAD. IT'S ONE OF THE MORE FRIGHTENING EXPERIENCES YOU'LL ENCOUNTER BEHIND THE WHEEL. <u>THE VEHICLE IS SHAKING</u> <b>SO BADLY YOU THINK IT'LL FALL APART AND THAT YOU'RE GOING TO DIE.</b> THAT'S WHY IT'S CALLED DEATH WOBBLE. <b>1 Affected Product</b>
12	
13	May 16, 2017 NHTSA ID NUMBER: 10986078 Components: STEERING, SUSPENSION
14	NHTSA ID Number: 10986078
	Incident Date February 22, 2017
15	Consumer Location MONTPELIER, VA
16	Vehicle Identification Number 1FT7W2BTXBE**** Summary of Complaint
17	CRASHNo
	FIRENo
18	INJURIES0
19	<b>DEATHS0</b> WHEN DRIVING THIS TRUCK, IF YOU HIT A POTHOLE OR ANY UNEVEN SURFACE, THE
20	TRUCK WILL SHAKE VIOLENTLY AND IT'S ALL OVER THE ROAD. IT TAKES ALL THE
	STRENGTH IN MY BODY JUST TO HOLD ONTO THE STEERING WHEEL, AND THE ONLY
21	WAY TO STOP IT IS COME ALMOST TO A COMPLETE STOP. SOMEONE'S GOING TO GET
22	KILLED, BECAUSE WHEN IT START TO SHAKE, YOU HAVE KNOW CONTROL OVER THE DIRECTION IT'S GOING TO GO. FROM WHAT I'VE READ ON THE NET, THIS SHAKE
23	IS CALLED THE DEATH WOBBLE AND FOR GOOD REASONS. I ALSO HEARD THAT FORD
	HAD KNOWN ABOUT THIS DEFECT FOR YEARS, BUT WANT DO ANYTHING EXCEPT GIVE
24	YOU THE RUN AROUND.
25	1 Affected Product
26	
27	January 22, 2018 NHTSA ID NUMBER: 11064272
	Components: SUSPENSION NHTSA ID Number: 11064272
28	Incident Date January 21, 2018
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1 2 3	Consumer Location ANCHORAGE, AK Vehicle Identification Number 1FT7W2BT5BE**** Summary of Complaint CRASHNo EDEN:
4	FIRENo INJURIESO
5	<b>DEATHS0</b> FROM DAY 1 I HAVE HAD ISSUES WHERE THE FRONT END WOULD BOUNCE
6	UNCONTROLLABLY AT HIGHWAY SPEEDS AFTER HITTING A POTHOLE OR BRIDGE
7	EXPANSION JOINT. IT'S GETTING WORSE. THE DEALERSHIP CANNNOT FIND ANY PROBLEMS. THEY TOLD ME AT ONE TIME TO REPLACE MY TIRES BUT THAT DID NOT
8	FIX THE ISSUE. <b>I ALMOST RAN OFF THE ROAD 4 TIMES IN ONE TRIP BECAUSE OF</b>
9	THIS AS I COULD NOT MAINTAIN CONTROL. THIS WILL KILL SOMEONE IF NOT RESEARCHED AND CORRECTED BY FORD.
10	1 Affected Product
11	
12	November 4, 2015 NHTSA ID NUMBER: 10788327 Components: STEERING, WHEELS, ELECTRONIC STABILITY CONTROL
13	NHTSA ID Number: 10788327
	Incident Date July 1, 2015 Consumer Location CHRISTMAS VALLEY, OR
14	Vehicle Identification Number 1FT7W2BT2BE****
15	Summary of Complaint
16	CRASHNo FIRENo
17	INJURIES0 DEATHS0
18	RE: THE DEATH WOBBLE WE HAVE A 2011 FORD F250 SUPER DUTY DIESEL PICK UP
19	WITH LESS THAN 20,000 MILES. IT IS LIKE NEW, BUT HAS DEVELOPED A SERIOUS MECHANICAL DEFECT. FORD MOTOR COMPANY HAS TRIED UP TO (11) ELEVEN FIXES
20	FOR THIS LIFE THREATENING PROBLEM WITH NO SUCCESS. NONE OF THESE "FIXES"
21	APPLY ON THIS PICK UP. NOW SINCE THE PICK UP IS OLDER THAN 3 YRS. EVEN WITH SUCH LOW MILEAGE THEY WANT US TO PAY FOR "TRYING" OUT MORE POSSIBLE FIXES
22	THAT HAVE CURRENTLY BEEN UNSUCCESSFUL FOR ALL THESE FORD 250 & 350 PICK
	UPS. THIS SHOULD BE AT THE FORD MOTOR COMPANY'S EXPENSE. THE BOTTOM LINE, IT SHOULD BE BOUGHT BACK BY FORD SINCE IT IS NOT YET PROVEN TO BE FIXABLE.
23	PROBLEM: THE "DEATH WOBBLE" AS DESCRIBED ON THE INTERNET. (SEE WEBSITE
24	BELOW). THIS OCCURS ANYTIME THESE FORD SUPER DUTY 250 OR 350 PICKUPS REACH 20K MILES. THIS OCCURS WHEN DRIVING OVER 40 MILES PER HOUR IF AT ANYTIME A
25 26	BUMP, ROUGH ROAD, OR POTHOLE IN THE ROAD IS HIT. THE OPERATOR LOOSES CONTROL OF THE VEHICLE. THIS VEHICLE IS WORSE THAN THE INTERNET VIDEO AS
	CONFIRMED BY THE BEND OREGON FORD DEALERSHIP. APPLYING THE BRAKES MAKES
27	IT WORSE. IT HAS TO BE ALLOWED TO SLOW DOWN ON ITS OWN. THE VIBRATION IS SO
28	VIOLENT IT TAKES ALL ONES STRENGTH TO KEEP IT ON THE ROAD. IT'S ONE OF THE MORE FRIGHTENING EXPERIENCES YOU'LL ENCOUNTER BEHIND THE WHEEL. <u>THE</u>
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1 2 3 4	VEHICLE IS SHAKING SO BADLY YOU THINK IT'LL FALL APART AND THAT YOU'RE GOING TO DIE. THAT'S WHY IT'S CALLED DEATH WOBBLE. HTTPS://WWW.YOUTUBE.COM/WATCH?V=8EUQ6F8RGT4 HTTPS://WWW.YOUTUBE.COM/WATCH?V=B_LMKNW9NHQ 1 Affected Product
5 6	January 12, 2016 NHTSA ID NUMBER: 10819770 Components: STEERING, WHEELS, ELECTRONIC STABILITY CONTROL NHTSA ID Number: 10819770
7 8 9	Incident Date July 4, 2015 Consumer Location NEWBERG, OR Vehicle Identification Number 1FT7W2BT2BE**** Summary of Complaint
9 10	CRASHNo FIRENo
11	INJURIES0 DEATHS0
12	WE HAVE A 2011 DIESEL FORD F250 SUPER DUTY PICKUP. IT IS LIKE NEW, BUT HAS
13	DEVELOPED A SERIOUS MECHANICAL DEFECT. WHEN IT HAD LESS THAN 20,000 MILES IT BEGAN HAVING THE "DEATH WOBBLE". WE HAVE CONSISTENTLY TRIED TO GET THE
14	LOCAL FORD DEALERSHIP IN BEND, OREGON AND FORD MOTOR CORPORATION TO RESOLVE THIS DEATH THREATENING MECHANICAL PROBLEM WITH NO LUCK. THIS
15	STARTED OCCURRING WHEN DRIVING OVER 40 MILES PER HOUR IF AT ANYTIME A
16	BUMP, ROUGH ROAD, OR POTHOLE IN THE ROAD IS HIT. NOW IT CAN'T EVEN BE DRIVEN THAT FAST WITHOUT VIOLENTLY AND UNCONTROLLABLY GOING INTO THE
17	DEATH WOBBLE. APPLYING THE BRAKES MAKES IT WORSE. IT HAS TO BE ALLOWED TO SLOW DOWN ON ITS OWN. THE VIBRATION IS SO VIOLENT IT TAKES ALL ONES
18	STRENGTH TO KEEP IT ON THE ROAD. IT'S ONE OF THE MOST FRIGHTENING
19	EXPERIENCES ONE WILL EVER ENCOUNTER BEHIND THE WHEEL. <u>THE VEHICLE IS</u> SHAKING SO BADLY YOU THINK IT'LL FALL APART AND THAT YOU'RE GOING TO
20	DIE. THE FIRST TIME IT HAPPENED WITH MY SON DRIVING, IT PULLED HIM INTO
21	ON-COMING TRAFFIC TOWARDS A SEMI-TRUCK. HE BARELY PULLED IT BACK INTO HIS LANE BEFORE HAVING A "HEAD ON" COLLISION. THE BEND OREGON
22	DEALERSHIP CONFIRMED THIS PICKUP DEATH WOBBLE IS WORSE THAN THOSE DESCRIBED ON THE INTERNET. (SEE WEBSITE BELOW). SEE INTERNET SITE EXAMPLES:
23	HTTPS://WWW.YOUTUBE.COM/WATCH?V=8EUQ6F8RGT4
24	HTTPS://WWW.YOUTUBE.COM/WATCH?V=B_LMKNW9NHQ 1 Affected Product
25	
26	January 22, 2019 NHTSA ID NUMBER: 11171468
27	Components: STEERING NHTSA ID Number: 11171468
28	Incident Date January 22, 2019
	Consumer Location GORE, VA -129-
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1 2 3 4 5 6 7 8 9 10 11	Vehicle Identification Number 1FT7W2BT6BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WHILE DRIVING 55-65 MPH THE STEERING STARTS SHAKING VIOLENTLY, YOU ARE UNABLE TO HOLD THE STEERING WHEEL STRAIGHT. IN ORDER TO STOP THIS YOU HAVE TO SLOW DOWN TO 15-20 MPH AS QUICKLY AS POSSIBLE BEFORE LOSING CONTROL HOPING NO ONE RUNS INTO YOU FOR HAVING TO STOP QUICKLY. THIS IS VERY DANGEROUS NOT KNOWING WHEN IT IS GOING HAPPEN. THIS IS SUCH A PROBLEM WITH FORD TRUCKS THAT STEERING STABILIZER KITS ARE LISTED ON LINE UNDER DEATH WOBBLE. DO YOU MEAN THAT PEOPLE HAVE TO DIE BEFORE FORD IS MADE TO DO SOMETHING ABOUT THIS? THIS HAS HAPPENED MULTIPLE TIMES. THE FORD DEALERSHIP SAID I NEEDED NEW TIRES. THIS DID NOT HELP. 1 Affected Product
<ol> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	July 2, 2014 NHTSA ID NUMBER: 10607807 Components: SUSPENSION, STEERING NHTSA ID Number: 10607807 Incident Date April 19, 2014 Consumer Location HAMBURG, NY Vehicle Identification Number 1FTBF3A60BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 **2011 F350 SD 4X2. FIRST NOTICED THIS PHENOMENON AT 65MPH ON THE THRUWAY. WHEN HITTING CERTAIN ROUGH ROAD SURFACE, OR BUMPS, OR CONCAVITIES ETC., FRONT WHEELS "HOP" TO ONE SIDE, STEERING THE VEHICLE INTO THE SHOULDER, IF "HOPPING" TO THE RIGHT, OR INTO THE LEFT LANE OF TRAFFIC IF BUMP CAUSES A LEFT SIDE "HOP". CAN "HOP" EITHER WAY DEPENDENT UPON WHICH WHEEL STRIKES THE ROUGH SURFACE. IF BOTH WHEELS STRIKE THE ROUGH SURFACE THEN IT CAN GO EITHER WAY. THIS HAPPENS AT LOWER SPEEDS AS WELL. CAN HOP 12" OR MORE. I AM FRIGHTENED BY THIS VEHICLE AS I COULD EASILY STRIKE A CONCRETE BARRIER OR CONCRETE CURB OR A PEDESTRIAN OR ANOTHER VEHICLE. I HAVE DRIVEN OTHER MANUFACTURERS VEHICLES OF SIMILAR GVWR, OVER THE LAST 35 YEARS, AND THIS PROBLEM IS PARTICULAR TO THIS MAKE AND MODEL ONLY. I COMPARED WITH A 2015 FORD, SAME VEHICLE, AND THAT DOES THE SAME THING. FORD CLAIMS ITS NORMAL. FORD CLAIMS IT IS NORMAL UNTIL YOU "LOAD IT" TO CAPACITY, JUST OVER 2 TONS. "ONCE ITS LOADED, YOU WILL BE OK", SAYS FORD. SO THER THEORY STATES ITS OK TO BE AN UNSAFE VEHICLE WHILE YOU'RE TRAVELING TO PICK UP YOUR 4000LB LOAD, THEN ONCE YOU'RE LOADED ITS OK, SO IF YOU HAVE NO LOAD FOR 50% OF THE
	TIME THEN ITS OK TO HAVE A VEHICLE THAT IS UNSAFE 1/2 THE TIME YOU DRIVE IT! -130-
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1 2	THIS IS OBVIOUSLY AN ENGINEERING PROBLEM AND I DOUBT FORD WILL ADMIT IT, BUT IT CERTAINLY IS UNSAFE AND SOMEBODY HAD BETTER LOOK INTO THIS BEFORE SOMEONE IS KILLED.
3	DEFORE SOMEONE IS MILLED.
4	**INCIDENTALLY, THIS IS A 2011 THAT I BOUGHT BRAND NEW IN 2014. IT SAT ON THE LOT FOR 3 YEARS. THIS HAS NO BEARING ON THE ISSUE HOWEVER SINCE THE 2015 DISPLAYS THE SAME TENDENCIES. *TR
5 6	1 Affected Product
7 8 9 10 11 12 13 14 15 16 17	September 20, 2012 NHTSA ID NUMBER: 10476600 Components: STEERING NHTSA ID Number: 10476600 Incident Date September 20, 2012 Consumer Location CEDAR RUN, NJ Vehicle Identification Number 1FT8W3BTXBE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 STEERING GOES INTO VIOLENT SHAKING. FEELS LIKE TIRES ARE FALLING OFF. SLOWED DOWN AND STOPPED. ACCORDING TO YOU'RE REPORTS THIS IS NOT THE FIRST TIME FOR THIS PROBLEM. <u>THIS SHOULD BE A RECALL BEFORE SOMEONE</u> GETS KILLED BECAUSE OF THIS. *TR 1 Affected Product
18 19	February 25, 2016 NHTSA ID NUMBER: 10838113 Components: SUSPENSION, ELECTRICAL SYSTEM, ELECTRONIC STABILITY CONTROL NHTSA ID Number: 10838113
20	Incident Date February 25, 2016
21	Consumer Location BLACKSHEAR, GA Vehicle Identification Number 1FT7W2BT1CE****
22	Summary of Complaint CRASHNo
23	FIRENo
24	INJURIES0 DEATHS0
25	TWO DIFFERENT PROBLEMS: FIRST I WAS LEFT STRANDED ABOUT 2 1/2 HOURS AWAY
26	FROM HOME BECAUSE OF A SIMPLE EGT SENSOR DEFECT SHUT DOWN MY TRUCK. HAD TO PAY A TOWER \$350 TO DRIVE MY TRUCK TO DEALERSHIP AND THEY TELL ME IT
27	WAS A LITTLE SENSOR THAT LEFT ME STRANDED. THIS TYPE THING SHOULDN'T HAPPEN WHEN YOU PAY \$60,000 PLUS FOR A VEHICLE. NOW MONTHS LATER I HAVE
28	ANOTHER ISSUE THAT FROM ALL THE BLOGS SAY IS A PROBLEM MOST 2012 MODELS HAVE CALLED THE "DEATH WOBBLE". IT IS NOW HAPPENING AT LEAST ONCE ON
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1 2 3 4 5 6 7 8 9 10 11 12 13	EVERY DRIVE I MAKE. I HAVE HAD OVER 8 SITUATIONS WHERE I HAVE HAD TO SLAM ON BREAKS TO MAKE THE VIBRATION STOP AND THE CAR BEHIND ME ALMOST SLAM INTO THE BACK OF MY TRUCK. BECAUSE ONCE THE WOBBLING STARTS YOU HAVE TO COME TO ALMOST A COMPLETE STOP BEFORE THE WOBBLING WILL STOP. MY WIFE NOW REFUSES TO DRIVE MY TRUCK BECAUSE SHE IS SCARED TO DEATH TO DRIVE IT. I DON'T EVEN LIKE TO DRIVE IT, BUT IT'S NECESSARY BECAUSE IT IS THE ONLY VEHICLE I HAVE TO DRIVE. I AM AT THE POINT OF WANTING TO TRADE IT, BUT WHAT KIND OF TRADE IN AM I GOING TO GET WITH THIS PROBLEM HAPPENING. MY 2012 JUST HAS A LITTLE MORE THAN 40,000 MILES, NOT VERY MUCH WHEN YOU ARE TALKING ABOUT A DIESEL ENGINE. IT IS HAPPENING MORE OFTEN NOW THAN BEFORE, AND I FELL IT WILL JUST CONTINUE TO HAPPEN MORE. NO ONE IN MY FAMILY WANTS TO DRIVE OR RIDE WITH ME IN MY TRUCK ANYMORE. IT SEEMS AS THOUGH FORD IS REFUSING TO ADMIT THAT THIS IS A PROBLEM ON EVERY ONLINE SITE I GO TOO, <u>I ASSUME IT WILL</u> <b>TAKE A FEW PEOPLE GETTING KILLED BEFORE THEY REALIZE THERE IS A</b> <b>PROBLEM. WHAT ARE OWNERS TO DUE WITH THIS, BECAUSE IF WE TRADE THE</b> <b>TRUCK KNOW ONE IS GOING TO WANT TO BUY IT. SO ONCE AGAIN THE CONSUMER</b> <b>GETS SHAFTED. NHTSA WE ARE LOOKING FOR YOU TO HELP US WITH THIS PROBLEM!</b> PLEASE!!!!!! <b>1 Affected Product</b>
13 14	December 5, 2016 NHTSA ID NUMBER: 10930091
15 16	Components: STEERING, SUSPENSION NHTSA ID Number: 10930091 Incident Date March 1, 2016
17 18	Consumer Location LIVINGSTON, TX Vehicle Identification Number 1FT7W2BT1CE**** Summary of Complaint
19 20	CRASHNo FIRENo INJURIES0
21 22 23	<b>DEATHS0</b> FORD F250 TRUCK - FRONT END SUSPENSION AND 4 WHEEL DRIVE PROBLEMS. SINCE MARCH OF THIS YEAR 2016, @ 90K MILES, WHILE DRIVING DOWN THE ROAD, TRAVELING AROUND 50 MPH, THE FRONT SUSPENSION ON MY FORD F250 STARTED SHAKING AND WOBBLE UNCONTROLLABLE. THIS HAS HAPPENED PROBABLY 20 TIMES
24 25	OR SO. THE WOBBLE WAS SO SERIOUS AND SCARY. I WOULD HAVE TO APPLY MY BRAKES AND HOLD ONTO THE STEERING WHEEL WITH A STRONG GRAB, TO KEEP MY TRUCK ON THE ROAD. OTHER VEHICLES AROUND MINE, WOULD SCATTER OUT OF MY
26 27	WAY. ON OCTOBER 17, 2016, I HAD THE STEERING DAMPER REPLACED AND THE TRACK BAR BALL REPLACED, COSTING \$361.71. "DEATH WOBBLE", WAS STILL HAPPENING. LAST MONTH ON NOVEMBER 14, 2016, I TOOK MY TRUCK INTO OUR LOCAL FORD
28	DEALERSHIP FOR REPAIRS ON THE SUSPENSION PROBLEM - "DEATH WOBBLE". REPAIRS INCLUDED, BAR - FRONT SUSPENSION TI, JOINT ASY - BALL, NUT, END ASY - DRAG LINK ROD, ROD, ROD ASY - DRAG LINK, ADJUSTER ASY @ 2, ALL REPLACED WITH NEW
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1 2 3 4 5 6 7 8	PARTS. REPLACE DRAG INK AND END, INSTALL ADJUSTERS FOR CASTOR, FRONT END ALIGNMENT (4 WHEEL DRIVE). THE FORD DEALERSHIP WAS EVEN AWARE OF THIS EXISTING PROBLEM WITH THE FORD F250 SUSPENSION, FROM PREVIOUS COMPLAINS AND REPAIRS. MY REPAIR COST WAS \$1205.07. NOW MY 4 WHEEL DRIVE WILL NOT LOCK IN ON THE FRONT END. I HAVE AN APPOINTMENT, TAKING MY TRUCK BACK TO FORD DEALERSHIP TOMORROW MORNING FOR ADDITIONAL REPAIRS. <u>THIS IS A</u> <u>MAJOR SAFETY ISSUE ON THESE VEHICLES AND SOMETHING MUST BE DONE</u> <u>ABOUT IT. A RECALL SHOULD AND MUST BE MANDATORY FOR THE PUBLIC</u> <u>SAFETY. THIS ISSUE WILL END UP KILLING SOMEONE (IF, IT HAS NOT ALREADY) IF,</u> <u>A RECALL IS NOT ORDERED IMMEDIATELY.</u> *TR 1 Affected Product
8	
9	August 29, 2017 NHTSA ID NUMBER: 11020396 Components: STEERING, SUSPENSION, WHEELS
10	NHTSA ID Number: 11020396
11	Incident Date August 27, 2017
12	Consumer Location COTTONWOOD, CA Vehicle Identification Number 1FT7W2BT2CE****
12	Summary of Complaint
13	CRASHNo
14	FIRENO
15	INJURIES0 DEATHS0
	WHILE DRIVING 60 MPH OVER HIGHWAY STEERING AND FRONT WHEELS
16	STARTING SHAKING SO VIOLENTLY THE TRUCK WAS OUT OF CONTROL AND
17	NEARLY CAUSED MAJOR ACCIDENT, THIS HAS HAPPENED TO US ON THREE
18	OCCASIONS. I FEEL THIS PROBLEM IS VERY DANGEROUS AND IS A FLAW IN THE
	DESIGN OF STEERING, SUSPENSION OF FRONT WHEELS OF TRUCK, I AM AFRAID TO DRIVE THIS \$67000.00 VEHICLE WITH 48000 MILES. I HAVE TAKEN THIS TRUCK IN AND
19	REPAIR SHOP SAYS THERE IS NO PROBLEM, I HAVE IT IN SHOP AGAIN WAITING FOR
20	ANOTHER OPINION! I FEEL THIS VEHICLE TYPE BE RECALLED, <u>I HOPE NOBODY DIES</u>
	FROM THIS FLAW IN MY VEHICLE AND IT IS WHY I WANTED TO REPORT THIS VERY
21	DANGEROUS VEHICLE 2012 FORD F-250 KING RANCH DEATH WOBBLE DRIVING
22	CONDITIONS ON THREE DIFFERENT OCCASIONS WERE ON HIGHWAY CONDITIONS
23	DRIVING OVER SMALL PAVEMENT BUMPS AT SPEEDS RANGING FROM 60 TO 70 MPH STRAIGHT ROADS AND ALSO TURNING ON CURVES, THE TRUCK SHAKES SO
	VIOLENTLY THAT YOU LOOSE CONTROL TRUCK SHAKING CONTINUES UNTIL THE
24	TRUCK ALMOST COMES TO A STOP WHILE YOU ARE BRAKING TO SLOW DOWN.
25	THIS HAPPENS SO FAST AND WITHOUT ANY WARNING IN STEERING OR ROAD FEEL,
	THIS OCCURS WITH SUCH SURPRISE AND SO VIOLENTLY OUT OF NOWHERE
26	1 Affected Product
27	
28	February 18, 2018 NHTSA ID NUMBER: 11073450
-	Components: SUSPENSION
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1 2 3 4 5	NHTSA ID Number: 11073450 Incident Date January 17, 2018 Consumer Location CORPUS CHRISTI, TX Vehicle Identification Number 1FT7W2BTXCE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0			
6	FRONT SUSPENSION SHAKES VIOLENTLY AT HIGHWAY SPEEDS. THE PROBLEM IS			
7	REFERRED TO AS THE "DEATH WOBBLE" BY THE FORD DEALERSHIP SERVICE MANAGER. THE FORD DEALERSHIP HAS MADE NUMEROUS ATTEMPTS TO RESOLVE			
8	THE PROBLEM BUT ALL HAVE FAILED. THERE ARE WEBSITES, FACEBOOK PAGES, AND			
9	FORUMS DEVOTED TO THIS PROBLEM. <b>DOES SOMEONE HAVE TO DIE BEFORE FORD</b> WILL ISSUE A RECALL????			
10	1 Affected Product			
11				
12	July 9, 2018 NHTSA ID NUMBER: 11110173			
13	Components: SUSPENSION NHTSA ID Number: 11110173			
14	Incident Date July 4, 2018			
15	Consumer Location COLUMBUS GROVE, OH Vehicle Identification Number 1FT7W2BTXCE****			
16	Summary of Complaint CRASHNo			
17	FIRENo			
18	INJURIES0 DEATHS0			
19	THE TRUCK SHAKES VIOLENTLY AT TIMES AFTER A BUMP IN THE ROAD. OUR TRUCK			
20	WENT BACK TO THE DEALER SEVERAL TIMES WHILE UNDER WARRANTY FOR THIS HOWEVER THEY SAID SINCE IT COULD NOT BE REPRODUCED CONSISTENTLY NOTHING			
21	COULD BE DONE. IT HAS GRADUALLY GOTTEN WORSE - MUCH WORSE. LAST SUMMER IT GOT SO BAD IT WAS SCARY TO DRIVE SO WE TOOK IT TO ANOTHER MECHANIC WHO			
22	PUT NEW SUSPENSION PARTS IN THE FRONT END. AFTER A COUPLE THOUSAND IN			
22	REPAIRS AND MANY NEW PARTS, IT STILL SHAKES SO VIOLENTLY WE CANNOT DRIVE IT SAFELY. FORD KNOWS ABOUT THESE COMPLAINTS - THEY ARE ALL OVER THE			
	INTERNET AND ON THIS SITE SO WHY CAN THIS NOT BE FIXED? I DROVE MY GRAND-			
24	DAUGHTERS IN IT ONE DAY TWO WEEKS AGO AND AFTER NOT HAPPENING FOR DAYS IT HAPPENED AND IT'S A WONDER WE DID NOT HIT THE ONCOMING CAR HEAD ON.			
25	SOMEONE IS GOING TO DIE IN ONE OF THESE TRUCKS AND THEN MAYBE FORD WILL			
26	STEP UP AND AT LEAST TELL THOSE OF US THAT OWN THEM HOW TO FIX THIS PROBLEM! IT SEEMS LIKE IT RARELY HAPPENS AT 40 MPH OR BELOW BUT HAPPENS			
27	QUICKLY AT 55 MPH OR MORE. IF SOMEONE DIES FROM THIS "DEATH WOBBLE" IT			
28	SHOULD BE FORD'S RESPONSIBILITY. 1 Affected Product			
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1	
2	
3	August 17, 2018 NHTSA ID NUMBER: 11120681 Components: STEERING
3	NHTSA ID Number: 11120681
4	Incident Date August 19, 2017
5	Consumer Location SKOKIE, IL
	Vehicle Identification Number 1FT7W2BT4CE****
6	Summary of Complaint CRASHNo
7	FIRENo
8	INJURIES0 DEATHS0
9	AS REPORTED FROM PREVIOUS OWNERS, DEATH WOBBLE HAS HAPPENED A NUMBER
10	OF TIMES. I GET WOBBLE AT DIFFERENT TIMES IN DRIVING. I HAD DRIVEN 240 MILES ON THE HIGHWAY WITH NO PROBLEMS. AS I APPROACHED A TRAFFIC LIGHT TO MAKE
11	A LEFT TURN, THE STEERING WHEEL STARTED TO WOBBLE AND FELT LIKE IT WANTED
12	TO LOCK UP. I PULLED OVER TO CHECK FRONT WHEELS WITH NOT NOTICING ANYTHING WRONG STARTED DRIVING AND WOBBLE WAS GONE. THE STEERING
	WHEEL HAS STARTED DOING MORE OF THE "DEATH WOBBLE" AT ANY SPEED. I SPOKE
13	WITH THE FORD DEALER AND THEY DIDN'T HAVE AN ANSWER. WHEN YOU SPEND
14	\$65,000.00 AND THIS HAPPENS THE MANUFACTURER SHOULD BE SENDING OUT RECALL
15	NOTICES. THE MANUFACTURE KNOWS ABOUT THIS AND CHANGED IT ON NEWER VEHICLES SO THEY MUST KNOW WHAT THE PROBLEM IS. LET'S HOPE NO ONE GETS
	<b>KILLED OR SERIOUS INJURED FROM THE DEATH WOBBLE.</b> IS FORD READY TO FIGHT
16	THIS IN COURT ON A CLASS ACTION LAWSUIT? MY VEHICLE HAS 149,000 MILES ON IT
17	AND STARTED AROUND 130,000 MILES. 1 Affected Product
18	
19	
	April 26, 2014 NHTSA ID NUMBER: 10585101
20	Components: STEERING, WHEELS, SUSPENSION NHTSA ID Number: 10585101
21	Incident Date April 18, 2014
22	Consumer Location CASTALIAN SPRINGS, TN
	Vehicle Identification Number 1FT7W2BT2CE****
23	Summary of Complaint CRASHNo
24	FIRENo
25	INJURIES0
	DEATHS0
26	DRAMATIC WHEEL AND FRONT END WOBBLE WHEN HITTING A BRIDGE TRANSITION.
27	VEHICLE BECOMES UNCONTROLLABLE AND CONTINUES TO SHAKE VIOLENTLY UNTIL VEHICLE COMES TO ALMOST A COMPLETE STOP. I HAD THIS SAME ISSUE IN MY 2005
28	F250 AND HAD TO CHANGE ALMOST ALL THE COMPONENTS OF THE FRONT END TO FIX. THERE ARE HUNDREDS OF PEOPLE SPEAKING ABOUT THIS ON THE FORUMS AND
	-135-
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1 2 3 4 5 6 7	STATE THAT THERE ARE TSBS THAT COVER THIS BUT THAT THE PARTS FAIL AGAIN IN ABOUT 25K MILES. I PULL A BOAT QUITE OFTEN AND IF THIS WOULD HAVE HAPPENED WITH A TRAILER BEHIND MY TRUCK THERE WOULD HAVE BEEN FATALITIES. AS IT WAS CARS WENT ALL OVER THE INTERSTATE TRYING TO GET AWAY FROM ME. THIS ISSUE HAS BEEN AROUND FOR A LONG TIME AND IT SEEMS THAT IT HAS NOT BEEN ADDRESSED BY THE MANUFACTURE. I LOVE AND NEED MY 3/4 TON TRUCK AND BELIEVE THAT FORD MAKES THE BEST TRUCK, <u>BUT THERE WILL BE DEATHS CAUSED BY THIS, IF NOT ALREADY.</u> NOW I WILL START THE LONG PROCESS OF GETTING THE DEALER TO FIX THE ISSUE. *TR 1 Affected Product
8         9         10         11         12         13         14         15         16         17         18         19         20         21         22         23	March 4, 2014 NHTSA ID NUMBER: 10567064 Components: WHEELS, STEERING, SUSPENSION NHTSA ID Number: 10567064 Incident Date March 1, 2014 Consumer Location COLTS NECK, NJ Vehicle Identification Number 1FT8W3DT9CE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 DEATHS0 DRIVING STRAIGHT ON A HIGHWAY AT 70 MPH, HIT A SMALL BUMP ON THE DRIVER SIDE ONLY. THE STEERING WHEEL STARTED SHAKING VIOLENTLY, THE FRONT END AND QUICKLY THE ENTIRE TRUCK FELT AS THOUGH IT WAS SHAKING APART AND WAS SWINGING BACK AND FORTH, I SLAMMED ON THE BRAKES AND THE SHAKING GOT WORSE UNTIL ABOUT 15 MPH, IT THEN STOPPED. I THEN GOT UP TO 60 MPH AND WHEN I HIT A BUMP THE SAME THING HAPPENED. THEN GOT UP TO 50 MPH AND THE SAME THING HAPPENED. THEN GOT UP TO 40 MPH AND IT DID NOT HAPPEN AGAIN AT THAT SPEED. I DROVE 100 MILES HOME AT 40 MPH ON A MAIN HIGHWAY. TODAY I AM BRINGING MY TRUCK TO THE DEALERSHIP TO HAVE IT FIXED UNDER WARRANTY, I WILL DO 40 MPH ALL THE WAY THERE. I WILL NOT TOW MY HORSES TRAILER WITH THIS VEHICLE, IT WOULD HAVE CAUSED AN ACCIDENT AND KILLED MY HORSES. *TR 1 Affected Product
23 24 25 26 27 28	April 9, 2014 NHTSA ID NUMBER: 10578607 Components: WHEELS, STEERING, SUSPENSION NHTSA ID Number: 10578607 Incident Date January 15, 2014 Consumer Location VALPARAISO, IN Vehicle Identification Number 1FT8W3BT4CE**** Summary of Complaint CRASHNo -136- Class Action Complaint Case No.

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	FIRENO INJURIESO DEATHSO IAM EXPERIENCING WHAT THEY CALL THE "DEATH WOBBLE". AFTER HITTING A SERIES OF BUMPS / POT HOLES, THE FRONT WHEELS START TO SHIMMY AND SHAKE THE TRUCK VIOLENTLY, VERY HARD TO CONTROL THE VEHICLE. AS THE MILEAGE INCREASES ON MY TRUCK, THE INCIDENTS ARE BECOMING MORE FREQUENT AND INTENSE. TODAY, 04/09/2014, I ALMOST GOT KILLED LITERALLY ! ON 1-65 SOUTH OF LAFAYETTE INDIANA, HIT A SERIOUS OF ROAD PATCH BUMPS AND HOLES THE TRUCK BEGAN TO SHIMMY AND SHAKE AND IT WENT INTO A FRENZY, THE WHOLE TRUCK SHAKING VIOLENTLY. CARS AROUND ME WERE DIVERTING AWAY, AND A SEMI WAS PUSHING HARD FROM BEHIND AND HIT HIS AIR BRAKES, I COULD NOT CONTROL THE VEHICLE. APPLVING THE BRAKES ONLY MADE IT WORSE. I AM A 6' 3" STRONG MUSCULAR MAN, AND COULD NOT CONTROL THE STEERING WHEEL OR DIRECTION OF THE VEHICLE. I STARTED IN THE RIGHT LANE, BUT WOUND UP IN THE MEDIAN, AND ALMOST TOOK OUT (2) CARS TO MY LEFT AND OF COURSE THE IMPENDING SEMI BEHIND ME. I TOLD THE DEALER OF THE ISSUE, THEY DID THEIR INSPECTIONS AND FOUND NOTHING. THE TRUCK IS OEM, I HAVE NOT ADDED OR MODIFIED A SINGLE THING, IT IS AS IT WAS FROM THE FACTORY. NOTHING HAS BEEN CHANGED OR MODIFIED FROM THE ORIGINAL FACTORY CONDITION !! A FORD CERTIFIED DEALERSHIP HAS SERVICED THIS VEHICLE SINCE THE DAY I BOUGHT IT NEW IN FEBRUARY OF 2013. THERE HAVE BEEN LAWSUITS FILED, I HAVE NOT HAD THE TIME TO DO MORE RESEARCH. BUT IT SEEMS PRETTY INCREDIBLE TO ME, <b>THAT WITH THIS RECURRING ISSUE THAT GOES BACK 15 YEARS OR MORE, THAT THIS AGENCY OR FORD HAS DONE NOTHING TO ADDRESS OR CORRECT THE SITUATION, GUESS WE NEED AT LEAST 12 DEATHS TO MAKE IT WORTH SOMEONE'S ATTENTION TO UNDERSTAND THAT THIS IS A SEVERE SAFETY PROBLEM, NOT ONLY TO THE DRIVER AND HIS OCCUPANTS, BUT TO OTHER DRIVERS ON THE ROAD AROUND</b>
18 19	ONE OF THESE TRUCKS WHEN THE "DEATH WOBBLE" DOES IT'S THING, TAKING OVER THE TRUCK. WHY IS THIS BEING IGNORED ?? *TR 1 Affected Product
<ul> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ul>	January 15, 2015 NHTSA ID NUMBER: 10672741 Components: POWER TRAIN, SUSPENSION, STEERING NHTSA ID Number: 10672741 Incident Date September 10, 2013 Consumer Location HIGHLANDS, TX Vehicle Identification Number 1FT8W3BT2CE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 THE FIRST TIME IT HAPPENED TO ME I WAS ON A TRIP IN CANADA FROM TEXAS. THE ROAD WAS A LITTLE BUMPY (FARM ROAD) I WAS DRIVING 30 M/H ACCELERATING TO -137-
	Class Action Complaint Case No.

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1	GET TO 60 M/H WHEN ALL OF SUDDEN THE TRUCK STARTED SHAKING SO BADLY MY
	HEAD HIT THE SIDE WINDOW. I COULDN'T STEER THE TRUCK AT ALL I SLOWED DOWN
2	TO 0M/H PUT IT ON PARK THEN STARTED ROLLING SLOWLY AND IT WAS GONE. IT DID
3	IT TO ME 3 TIMES ON A 3 WEEKS PERIOD. SINCE THE ROADS ARE BAD UP THERE I KINDA LEFT IT AS THAT AND TOLD MY HUSBAND ABOUT IT WHEN I CAME BACK TO
4	TEXAS. WE HAD THE TIRES ROTATED AND THEY COULDN'T SEE ANYTHING ELSE
5	WRONG UNDER THE TRUCK. I WAS MONTHS WITHOUT HAVING ANYTHING SIMILAR
6	HAPPENING TO ME AND YESTERDAY I AM ON I-10 ROLLING ABOUT 65M/H AND THERE IT GOES AGAIN AND IT WAS WORST THEN THE OTHER TIMES I FELL MY TRUCK WAS
Ĩ	ABOUT TO EXPLODE FROM UNDER ME SHAKING TO NO END AND NO STEERING
7	CONTROL AT ALL EVEN WHEN LETTING GO THE GAS IT KEPT GOING AND SHAKING
8	AND MY TRUCK SHAKE ITS WAY FROM ONE LANE TO ANOTHER ONE AND FINALLY STOPPED 3 INCHES FROM THE RETAINING WALL OF THE OVERPASS. <b>I COULD HAVE</b>
9	KILLED MYSELF. I HAD NO MORE CONTROL AT ALL ON THIS TRUCK WHICH IS A
10	(2012 F-350 KING RANCH WITH ABOUT 40,000 MILES ON IT) LUCKELY FOR ME I WAS ALMOST ALONE ON THE HIGHWAY. I CALLED MY DEALER AND THEY TOLD ME TO
11	BRING IN THE TRUCK NEXT TUESDAY TO SEE WHAT IS WRONG WITH IT. I ASK IF THERE
11	WAS A RECALL AND THEY DID NOT SAY YES OR NO JUST TO BRING THE TRUCK IN. I
12	GOT ANOTHER 2012 F-350 LARIAT AND MY HUSBAND SAID HIS TRUCK DID IT TO HIM ONCE A WHILE BACK. I WRITE UP THE OUTCOME AFTER THE VISIT AT THE DEALER.
13	*TR
14	1 Affected Product
15	
16	August 13, 2016 NHTSA ID NUMBER: 10895527
	Components: SUSPENSION NHTSA ID Number: 10895527
17	Incident Date August 12, 2016
18	Consumer Location LEESBURG, GA
19	Vehicle Identification Number 1FT8W3BT9CE****
	Summary of Complaint CRASHNo
20	FIRENo
21	INJURIES0
22	DEATHS0
23	FRONT END SUSPENSION BOUNCING AT MED-HIGH SPEEDS UPON HITTING A BUMP. DESCRIBED IN OTHER SEARCHES AS CASTER WOBBLE OR "DEATH WOBBLE" TRUCK
	HAS LESS THAN 100,000 MILES, UNABLE TO CORRECT THE PROBLEM EVEN AFTER
24	REPLACEMENT OF OVER \$2000 WORTH OF PARTS. MULTIPLE OTHER COMPLAINTS
25	FOUND ONLINE FROM OTHER OWNERS. PARTS REPLACED INCLUDE, TIE ROD ENDS, TIE
26	ROD TUBE, BALL JOINTS, TRACK BAR, STEERING STABILIZER AND END BUSHINGS. THE ISSUE CREATES AN UNDRIVABLE AND EXTREMELY DANGEROUS CONDITION FOR
	DRIVER, PASSENGERS AND OTHER MOTORISTS. UPON REACHING SPEEDS OF 40 MPH+
27	ANY DISTURBANCE (BUMPS) IN THE ROAD CREATES THE START OF THE FRONT END
28	VIOLENTLY BOUNCING AND IT WILL NOT STOP UNTIL THE VEHICLE COMES TO ALMOST A COMPLETE STOP. I WAS REQUIRED TO STOP 6 TIMES WITHIN 3 MILES OF A
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1 2 3 4	BUSY 5 LANE INTERSTATE (I-285 IN ATLANTA) QUITE LITERALLY IN THE MIDDLE OF THE INTERSTATE. THIS HAS BEEN WORKED ON WITH 2 DIFFERENT DEALERSHIPS, SUNBELT FORD IN ALBANY GA, & ANGELA KRAUSE FORD IN ALPHARETTA GA. IT'S MY FEELING THAT A \$65,000 VEHICLE WITH LESS THAN 100,000 MILES SHOULD NEVER HAVE A DANGEROUS ISSUE LIKE THIS. THERE SHOULD ABSOLUTELY BE A FIX AND/OR RECAL AHGAINST THIS VEHICLE BEFORE SOMEONE GETS KILLED.
5	1 Affected Product
6	
	September 22, 2017 NHTSA ID NUMBER: 11025099
7	Components: ELECTRONIC STABILITY CONTROL, STEERING, SUSPENSION
8	NHTSA ID Number: 11025099 Incident Date September 21, 2017
9	Consumer Location MICANOPY, FL
10	Vehicle Identification Number 1FT8W3BT7DE****
	Summary of Complaint
11	CRASHNo FIRENo
12	INJURIES0
13	DEATHS0
	WHILE OUR TRUCK ON A NORMAL HIGHWAY WITH MINOR IRREGULARITIES AND SOME
14	ROUGH SURFACES AT A SPEED OF 60 TO 70 MPH, THE TRUCK WILL START TO OSCILLATE TO THE POINT OF INDUCING A VIOLENTLY STEERING WHEEL SHIMMY AND
15	AN UNCONTROLLABLE BOUNCE OF THE FRONT WHEELS. THIS HAS HAPPENED TWICE
16	IN THE PAST 2-MONTHS WHEN I HAVE TAKEN THE TRUCK ON THE HIGHWAY. THE
	TRUCK IS PRIMARILY DRIVEN IN TOWN, I AM NOW SCARED TO GO ON THE ROAD WITH THE TRUCK AS THE CONDITION SEEMS TO BE GETTING WORSE. I HAVE TO BRAKE
17	QUICKLY AND STEER THE TRUCK TO THE SIDE OF THE ROAD TO STOP THE
18	OSCILLATION. THE SHAKING IS HAS ALMOST CAUSED AN ACCIDENT BOTH TIMES WITH
19	THE VEHICLE BEING VERY DIFFICULT TO CONTROL. ONLY AFTER SLOWING TO
0	APPROXIMATELY 30 MPH DOES THE OSCILLATION STOP. UPON RESEARCHING THIS PROBLEM, I AM PERPLEXED WHY FORD OR THE NTHSA HAVE NOT STEPPED FORWARD
20	TO ADDRESS THIS ISSUE, SOMEONE WILL BE HURT OR KILLED IF A SOLUTION IS
21	NOT FOUND. WE HAVE TAKEN THE TRUCK NOW TO TWO DIFFERENT CERTIFIED FORD
22	DEALERSHIPS AFTER EACH INCIDENT EACH TIME WE WERE TOLD THERE WAS NOTHING WRONG WITH THE VEHICLE AND THIS SOMETIMES HAPPENS WITH THESE
23	TRUCKS. THIS CAN'T SERIOUSLY BE TRUE? AFTER DOING RESEARCH I'VE FOUND THAT
	THE "DEATH WOBBLE" AS THIS PROBLEM HAS BEEN TERMED BY THE MASSES IS A
24	SERIOUS PROBLEM AND HAS BEEN FOR MANY YEARS NOT FOR THE SELECT FEW
25	CONSUMERS BUT FOR SO MANY.
26	1 Affected Product
27	
	March 29, 2018 NHTSA ID NUMBER: 11081940 Components: STEERING, SUSPENSION
28	NHTSA ID Number: 11081940
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	Class Action Complaint
	Case No.

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Incident Date March 14, 2018 Consumer Location PARKER, CO Vehicle Identification Number 1FT83BT3FEC**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 MY TRUCK AT AROUND 15000 MILES HAD SOME WOBBLE AFTER HITTING BUMPS ON HIGHWAY. I TOOK IT IN FOR ITS 25000 MILE CHECK UP AND STATED THIS AS WELL AS POOR ECONOMY OR 1 OR SO. THEY SAID NOTHING WAS WRONG WELL AT 27000 MILES IT WAS SHAKING SO VIOLENT I DEMANDED IT BE BROUGHT IN FOR SERVICE IT WAS GOING TO KILL SOMEONE! GROOVE FORD LOOKED IT OVER (WHO BOUGHT IT FROM) AND SAID THE ENTIRE FRONT END WAS WORN OUT AND WAS NOT COVERED BECAUSE NOW IT WAS 40 DAY PAST THE 3 YEAR. EVEN THOUGHT THEY TOLD ME TO WAIT, AND IT WAS 9000MILES UNDER THE MILLAGE!! I FINALLY GOT FORD TO PAY FOR 2000 AND THE GROOVE FORD PAID NOTHING I PAID 700. THEY VERY DAY I GOT IT BACK I WAS THEN HEARING A NOISE TURNING SHARPLY LEFT ON STEERING WHEEL ROTATION. I WAS TOLD THAT ANOTHER \$700 AND NOTHING TO DO WITH WHAT THEY DID. THEY SOLD ME A AFTER MARKET WARRANTY THAT THEY NEVER INTENDED TO HONOR AND DID NOT COVER MY PROBLEMS. WHICH SHOULD BE FRAUD. EVERY ONES ALWAYS GONE OR ON VACATION. STILL NO REFUND ON IT AND NOW I LOOK TO TRADE IN THE PROBLEM. 1 Affected Product
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	September 15, 2018 NHTSA ID NUMBER: 11129632 Components: STEERING, SUSPENSION NHTSA ID Number: 11129632 Incident Date September 1, 2018 Consumer Location DOUSMAN, WI Vehicle Identification Number 1FT7W2B61EE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 AT HIGH SPEEDS HITTING POT HOLES OR BRIDGE DECKS, FRONT END WOBBLES UNCONTROLLABLY. IT'S REFERRED TO AS (DEATH WOBBLE) NEED TO HIT THE BRAKES HARD TO STOP IT. VERY DANGEROUS. FORD KNOWS ABOUT THE PROBLEM AND IS TURNING A BLIND EYE.CRASHING ON THE FREEWAY AT THOSE SPEEDS COULD BE CATASTROPHIC. SOME VEHICLES HAVE AS LITTLE AS 20000 MILES ON THEM, MINE HAS 51000. JUST PUT NEW TIRES,FRONT SHOTS AND STEERING STABILIZER ON IT. STILL HAVE THE PROBLEM. PLEASE GOOGLE (2014 FORD F250 SUPER DUTY FRONT END ISSUES). US CONSUMERS ARE PAYING BIG, BIG MONEY FOR THESE VEHICLES. \$700000 IN SOME CASES. I PAID 40000 AND I'M AFRAID TO DRIVE IT. <u>ALL I WANT IS FOR FORD</u> -140- Class Action Complaint
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TO FACE THE FACT'S AND FIX IT. BEFORE SOME GETS KILLED' I WROTE TO WILLIAM FORD AT FORD MOTOR COMPANY A WEEK AGO BUT HAVE NOT HEARD BACK. I CAN'T STRESS TO YOU ENOUGH WHAT A DANCEROUS ISSUE THIS IS. WOULD LOVE TO TAKE WY TRUCK TO THE FORD MOTOR COMPANY AND HAVE JIM HACKETT DRIVE IT. THEN I WOULD BE FIXED. JUST A SIDE NOTE, THERE WAS A CONSUMER IN SILSBE TEXAS THAT NOTED THE SERVICE WRITER AT SILSBE FORD SAIL THAT SHE DOESN'T KNOW WHY FORD DOESN'T FIX THIS BECAUSE IT IS SUCH A BIG PROBLEM. IN CLOSING PLEASE, PLEASE, PLEASE LOOK INTO THIS ISSUE AND HOLD FORDS FEET TO THE FIRE. THANK YOU. 1 Affected Product January 10, 2019 NHTSA ID NUMBER: 11166160 Components: SUSPENSION NHTSA ID Number: 11166160 Incident Date May 13, 2016 Consumer Location LINCOLN, AL Vehicle Identification Number 1FT7W2BT0EE**** Summary of Complaint CRASHNO FIRENO INJURIES0 DEATHS0 MY TRUCK IS AT THE DEALERSHIP FOR THE 3RD TIME FOR HAVING THE ?DEATH WOBBLE: FIRST TIME THEY REPLACED BALL JOINTS. SECOND TIME THEY REPLACED A BAR AND BALL JOINTS. IT WASN'T LONG TILL I FELT THE SHIMMY AGAIN. AT THIS POINT I AM AFRAID TO DRIVE IT BECAUSE I CARPOOL MY 3 GRANDKIDS AROUND ON A DALLY BASIS AND I DONT WAN'T TO RISK THEIR LIVES. YOU NEVER KNOW WHEN THE DEATH WOBBLE IS GOING TO HAPPEN BUT IT IS USUALLY WHEN YOU ARE DRIVING 55- O MPH AND HIT A SLIGHT BUMP IN THE ROAD. THE WORD ELS SO SEVERE YOU CAN HARDLY KEEP CONTROL. YOU HAVE TO HIT YOUR BRAKES AND DECREASE YOUR SPEED UNTIL THE WOBBLEING STOPS. THIS COULD PROVE TO BE FATAL IN HEAVY SPEED UNTIL THE WOBBLENG STOPS. THIS COULD PROVE TO BE FATAL IN HEAVY INAERSTAND WHY THERE HAS NOT BEEN A RECALL ON THIS. I DROPPED MY UPHICLE OF AT THE DEALERSHIP YESTENDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTFIL BY THEME CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR THIS PROBLEMY IT THERE HAS NOT DESEN A RECALL ON THIS. I DROPPED MY UPHICLE DY THEME CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR THIS PROBLEMY IT THERE HAS NOT DESEN A RECALL ON THIS. I DROPPED MY UPHICLE DY THEME CAN ANYONE TELL ME WHAT WOU	Case 3:19-cv-01082-AJB-AHG	Document 1 Filed 06/10/19 of 353	PageID.141	Page 141
Components: SUSPENSION NHTSA ID Number: 11166160 Incident Date May 13, 2016 Consumer Location LINCOLN, AL Vehicle Identification Number 1FT7W2BT0EE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 MY TRUCK IS AT THE DEALERSHIP FOR THE 3RD TIME FOR HAVING THE ?DEATH WOBBLE?. FIRST TIME THEY REPLACED BALL JOINTS. SECOND TIME THEY REPLACED A BAR AND BALL JOINTS. IT WASN'T LONG TILL I FELT THE SHIMMY AGAIN. AT THIS POINT I AM AFRAID TO DRIVE IT BECAUSE I CARPOOL MY 3 GRANDKIDS AROUND ON A DAILY BASIS AND I DON'T WANT TO RISK THEIR LIVES. YOU NEVER KNOW WHEN THE DEATH WOBBLE IS GOING TO HAPPEN BUT IT IS USUALLY WHEN YOU ARE DRIVING 55- 70 MPH AND HIT A SLIGHT BUMP IN THE ROAD. THE WOBBLE IS SO SEVERE YOU CAN HARDLY KEEP CONTROL. YOU HAVE TO HIT YOUR BRAKES AND DECREASE YOUR SPEED UNTIL THE WOBBLING STOPS. THIS COULD PROVE TO BE FATAL IN HEAVY TRAFFIC. IF YOU GOOGLE THE DEATH WOBBLE THERE IS A LOT OF INFORMATION ON IT AND IT HAS HAPPENED NUMEROUS TIMES FOR SEVERAL YEARS. I CAN NOT UNDERSTAND WHY THERE HAS NOT BEEN A RECALL ON THIS. I DROPPED MY VEHICLE OFF AT THE DEALERSHIP YESTERDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTIFIEI BY THEM. CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK THE VEHICLE AND DESTROY IT TO PREVENT SEVERE INJURY OR DEATH TO SOMEONE. I LOVE MY TRUCK BUT NOW IT HAS PROVEN TO BE UNRELIABLE AND POSSIBLY DANGEROUS. 1 Affected Product -141- Class Action Complaint	WILLIAM FORD AT FORD I BACK. I CAN'T STRESS TO WOULD LOVE TO TAKE MY HACKETT DRIVE IT, THEN I CONSUMER IN SILSBE TEXA THAT SHE DOESN'T KNOW V PROBLEM. IN CLOSING PLEA FORDS FEET TO THE FIRE. T	MOTOR COMPANY A WEEK AG YOU ENOUGH WHAT A DANGE TRUCK TO THE FORD MOTOR C WOULD BE FIXED. JUST A SIDE AS THAT NOTED THE SERVICE W WHY FORD DOESN'T FIX THIS BE ASE,PLEASE,PLEASE LOOK INTO	O BUT HAVE ROUS ISSUE T OMPANY AND NOTE, THERE RITER AT SILS CAUSE IT IS S	NOT HEARD FHIS IS. I HAVE JIM WAS A SBE FORD SAID UCH A BIG
Consumer Location LINCOLN, AL Vehicle Identification Number 1FT7W2BT0EE**** Summary of Complaint CRASHNO FIRENO INJURIESO DEATHSO MY TRUCK IS AT THE DEALERSHIP FOR THE 3RD TIME FOR HAVING THE ?DEATH WOBBLE?. FIRST TIME THEY REPLACED BALL JOINTS. SECOND TIME THEY REPLACED A BAR AND BALL JOINTS. IT WASN?T LONG TILL I FELT THE SHIMMY AGAIN. AT THIS POINT I AM AFRAID TO DRIVE IT BECAUSE I CARPOOL MY 3 GRANDKIDS AROUND ON A DAILY BASIS AND I DON?T WANT TO RISK THEIR LIVES. YOU NEVER KNOW WHEN THE DEATH WOBBLE IS GOING TO HAPPEN BUT IT IS USUALLY WHEN YOU ARE DRIVING 55- 70 MPH AND HIT A SLIGHT BUMP IN THE ROAD. THE WOBBLE IS SO SEVERE YOU CAN HARDLY KEEP CONTROL. YOU HAVE TO HIT YOUR BRAKES AND DECREASE YOUR SPEED UNTIL THE WOBBLING STOPS. THIS COULD PROVE TO BE FATAL IN HEAVY TRAFFIC. IF YOU GOOGLE THE DEATH WOBBLE THERE IS A LOT OF INFORMATION ON IT AND IT HAS HAPPENED NUMEROUS TIMES FOR SEVERAL YEARS. I CAN NOT UNDERSTAND WHY THERE HAS NOT BEEN A RECALL ON THIS. I DROPPED MY VEHICLE OFF AT THE DEALERSHIP YESTERDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTIFIEI BY THEM. <u>CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK THE VEHICLE AND DESTROY IT TO PREVENT SEVERE INJURY OR DEATH TO SOMEONE. I LOVE MY TRUCK BUT NOW IT HAS PROVEN TO BE UNRELIABLE AND POSSIBLY DANGEROUS. 1 Affected Product -141- Class Action Complaint</u>	<b>Components: SUSPENSION</b>			
CRASHNO FIRENO INJURIESO DEATHSO MY TRUCK IS AT THE DEALERSHIP FOR THE 3RD TIME FOR HAVING THE ?DEATH WOBBLE?. FIRST TIME THEY REPLACED BALL JOINTS. SECOND TIME THEY REPLACED A BAR AND BALL JOINTS. IT WASN?T LONG TILL I FELT THE SHIMMY AGAIN. AT THIS POINT I AM AFRAID TO DRIVE IT BECAUSE I CARPOOL MY 3 GRANDKIDS AROUND ON A DAILY BASIS AND I DON?T WANT TO RISK THEIR LIVES. YOU NEVER KNOW WHEN THE DEATH WOBBLE IS GOING TO HAPPEN BUT IT IS USUALLY WHEN YOU ARE DRIVING 55. 70 MPH AND HIT A SLIGHT BUMP IN THE ROAD. THE WOBBLE IS SO SEVERE YOU CAN HARDLY KEEP CONTROL. YOU HAVE TO HIT YOUR BRAKES AND DECREASE YOUR SPEED UNTIL THE WOBBLING STOPS. THIS COULD PROVE TO BE FATAL IN HEAVY TRAFFIC. IF YOU GOGLE THE DEATH WOBBLE THERE IS A LOT OF INFORMATION ON IT AND IT HAS HAPPENED NUMEROUS TIMES FOR SEVERAL YEARS. I CAN NOT UNDERSTAND WHY THERE HAS NOT BEEN A RECALL ON THIS. I DROPPED MY VEHICLE OFF AT THE DEALERSHIP YESTERDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTIFIEI BY THEM. <u>CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK THE VEHICLE AND DESTROY IT TO PREVENT SEVERE INJURY OR DEATH TO SOMEONE. I LOVE MY TRUCK BUT NOW IT HAS PROVEN TO BE UNRELIABLE AND POSSIBLY DANGEROUS. 1 Affected Product -141- Class Action Complaint</u>	<b>Consumer Location</b> LINCOLN <b>Vehicle Identification Number</b>	·		
MY TRUCK IS AT THE DEALERSHIP FOR THE 3RD TIME FOR HAVING THE ?DEATH WOBBLE?. FIRST TIME THEY REPLACED BALL JOINTS. SECOND TIME THEY REPLACED A BAR AND BALL JOINTS. IT WASN?T LONG TILL I FELT THE SHIMMY AGAIN. AT THIS POINT I AM AFRAID TO DRIVE IT BECAUSE I CARPOOL MY 3 GRANDKIDS AROUND ON A DAILY BASIS AND I DON?T WANT TO RISK THEIR LIVES. YOU NEVER KNOW WHEN THE DEATH WOBBLE IS GOING TO HAPPEN BUT IT IS USUALLY WHEN YOU ARE DRIVING 55- 70 MPH AND HIT A SLIGHT BUMP IN THE ROAD. THE WOBBLE IS SO SEVERE YOU CAN HARDLY KEEP CONTROL. YOU HAVE TO HIT YOUR BRAKES AND DECREASE YOUR SPEED UNTIL THE WOBBLING STOPS. THIS COULD PROVE TO BE FATAL IN HEAVY TRAFFIC. IF YOU GOOGLE THE DEATH WOBBLE THERE IS A LOT OF INFORMATION ON IT AND IT HAS HAPPENED NUMEROUS TIMES FOR SEVERAL YEARS. I CAN NOT UNDERSTAND WHY THERE HAS NOT BEEN A RECALL ON THIS. I DROPPED MY VEHICLE OFF AT THE DEALERSHIP YESTERDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTIFIEI BY THEM. <u>CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR</u> THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK THE VEHICLE AND DESTROY IT TO PREVENT SEVERE INJURY OR DEATH TO SOMEONE. I LOVE MY TRUCK BUT NOW IT HAS PROVEN TO BE UNRELIABLE AND POSSIBLY DANGEROUS. 1 Affected Product -141- Class Action Complaint	CRASHNo FIRENo INJURIES0			
DEATH WOBBLE IS GOING TO HAPPEN BUT IT IS USUALLY WHEN YOU ARE DRIVING 55- 70 MPH AND HIT A SLIGHT BUMP IN THE ROAD. THE WOBBLE IS SO SEVERE YOU CAN HARDLY KEEP CONTROL. YOU HAVE TO HIT YOUR BRAKES AND DECREASE YOUR SPEED UNTIL THE WOBBLING STOPS. THIS COULD PROVE TO BE FATAL IN HEAVY TRAFFIC. IF YOU GOOGLE THE DEATH WOBBLE THERE IS A LOT OF INFORMATION ON IT AND IT HAS HAPPENED NUMEROUS TIMES FOR SEVERAL YEARS. I CAN NOT UNDERSTAND WHY THERE HAS NOT BEEN A RECALL ON THIS. I DROPPED MY VEHICLE OFF AT THE DEALERSHIP YESTERDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTIFIEI BY THEM. <u>CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK THE VEHICLE AND DESTROY IT TO PREVENT SEVERE INJURY OR DEATH TO SOMEONE. I LOVE MY TRUCK BUT NOW IT HAS PROVEN TO BE UNRELIABLE AND POSSIBLY DANGEROUS. 1 Affected Product September 10, 2017 NHTSA ID NUMBER: 11022555 Components: STEERING -141- Class Action Complaint</u>	MY TRUCK IS AT THE DEAL WOBBLE?. FIRST TIME THE BAR AND BALL JOINTS. IT W POINT I AM AFRAID TO DRI	Y REPLACED BALL JOINTS. SECO VASN?T LONG TILL I FELT THE S VE IT BECAUSE I CARPOOL MY 3	OND TIME THE HIMMY AGAII 3 GRANDKIDS	Y REPLACED A N. AT THIS AROUND ON A
TRAFFIC. IF YOU GOOGLE THE DEATH WOBBLE THERE IS A LOT OF INFORMATION ON IT AND IT HAS HAPPENED NUMEROUS TIMES FOR SEVERAL YEARS. I CAN NOT UNDERSTAND WHY THERE HAS NOT BEEN A RECALL ON THIS. I DROPPED MY VEHICLE OFF AT THE DEALERSHIP YESTERDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTIFIEI BY THEM. <u>CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR</u> THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK THE VEHICLE AND DESTROY IT TO PREVENT SEVERE INJURY OR DEATH TO SOMEONE. I LOVE MY TRUCK BUT NOW IT HAS PROVEN TO BE UNRELIABLE AND POSSIBLY DANGEROUS. 1 Affected Product September 10, 2017 NHTSA ID NUMBER: 11022555 Components: STEERING -141- Class Action Complaint	DEATH WOBBLE IS GOING 7 70 MPH AND HIT A SLIGHT H HARDLY KEEP CONTROL. Y	TO HAPPEN BUT IT IS USUALLY V BUMP IN THE ROAD. THE WOBBI OU HAVE TO HIT YOUR BRAKES	WHEN YOU AR LE IS SO SEVEI S AND DECREA	RE DRIVING 55- RE YOU CAN ASE YOUR
THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK         THE VEHICLE AND DESTROY IT TO PREVENT SEVERE INJURY OR DEATH TO         SOMEONE. I LOVE MY TRUCK BUT NOW IT HAS PROVEN TO BE UNRELIABLE AND         POSSIBLY DANGEROUS.         1 Affected Product         September 10, 2017 NHTSA ID NUMBER: 11022555         Components: STEERING         -141-         Class Action Complaint	TRAFFIC. IF YOU GOOGLE T IT AND IT HAS HAPPENED N UNDERSTAND WHY THERE	HE DEATH WOBBLE THERE IS A IUMEROUS TIMES FOR SEVERAL HAS NOT BEEN A RECALL ON TI	LOT OF INFOR VEARS. I CAN HIS. I DROPPEI	RMATION ON NOT O MY VEHICLE
POSSIBLY DANGEROUS. 1 Affected Product September 10, 2017 NHTSA ID NUMBER: 11022555 Components: STEERING -141- Class Action Complaint	THIS PROBLEM? IF THERE THE VEHICLE AND DESTR	<u>IS NOT ONE THEN FORD SHOU</u> OY IT TO PREVENT SEVERE IN	JLD HAVE TO JURY OR DEA	<u>BUY BACK</u> TH TO
Components: STEERING -141- Class Action Complaint	POSSIBLY DANGEROUS.		TO DE UNREI	
Class Action Complaint	-			
	11 1	-141-		

¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.142 Page 142 of 353
1 2 3 4 5 6 7 8 9 10 11 12	NHTSA ID Number: 11022555 Incident Date August 31, 2017 Consumer Location DISCOVERY BAY, CA Vehicle Identification Number 1FT7W2BT5EE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 4WD FRONT END SHAKES VIOLENTLY WITHOUT WARNING AROUND 50 MPH.FRONT WHEELS WOBBLE ON STOCK VEHICLE 37000 MILES.HAVE TO COME TO A COMPLETE STOP TO MAKE IT GO AWAY.UNABLE TO TURN LEFT OR RIGHT AS ITS HAPPENING. <u>ALMOST KILLED MY FAMILY.</u> SEEMS TO BE KNOWN AS "DEATH WOBBLE" TO THE ONLINE COMMUNITY ALSO SEEMS TO COMMON TO NOT BE A ISSUE.FORD CLAIMS ITS A WORN TRACK BAR BUSHING AND WOULD NOT FIX THIS UNDER MY DRIVETRAIN WARRANTY.EXPERTS CLAIM IT IS DESIGN ISSUE IN THE 4WD FRONT END CASTER ANGLE.HAS HAPPEND MULTIPLE OCCASIONS 1 Affected Product
13 14 15 16 17	July 15, 2017 NHTSA ID NUMBER: 11005447 Components: STEERING, SUSPENSION NHTSA ID Number: 11005447 Incident Date July 14, 2017 Consumer Location APPLE VALLEY, CA Vehicle Identification Number 5SFBG3828BE**** Summary of Complaint CRASHNo
18 19	FIRENo INJURIESO DEATHSO
<ul><li>20</li><li>21</li><li>22</li></ul>	I HAVE EXPERIENCED AN EXTREME SHIMMING (DEATH WOBBLE) NUMEROUS TIMES WHILE DRIVING AT SPEED ON THE FREEWAY. AFTER GOING OVER A BRIDGE EXPANSION JOINT OR JUST A ROUGH SPOT IN THE HIGHWAY, MY TRUCK STARTS SHIMMING SO VIOLENTLY THAT I HAVE TO BRAKE HARD TO SLOW THE TRUCK UNTIL IT STOPS. THIS HAPPENED TO ME TWICE YESTERDAY (7/14/17). THE FIRST TIME IT
<ul><li>23</li><li>24</li><li>25</li></ul>	HAPPENED I ALMOST CAUSED AN ACCIDENT BEHIND ME WHEN I APPLIED THE BRAKES. THE SECOND TIME I WAS IN THE SLOW LANE AND WAS ABLE TO GET ON THE SHOULDER TO DECELERATE. THIS WAS THE FIRST TIME MY WIFE WAS WITH ME WHEN THIS HAPPENED AND SHE SAID IF SHE WAS DRIVING SHE WOULD HAVE LOST CONTROL
26 27 28	OF THE TRUCK. I UNDERSTAND FROM SPEAKING WITH OTHER FORD F-250 4X4 OWNERS THAT THIS IS A COMMON ISSUE. IS ANYTHING BEING DONE TO REMEDY THIS ISSUE. I DID NOT SEE ANY RECALL FOR THIS ON YOUR SITE OR ON FORD'S SITE. I HAVE AN APPOINTMENT AT THE LOCAL FORD DEALER, NEXT WEDNESDAY TO HAVE THEM CHECK THE FRONT SUSPENSION FOR ANY DEFECTS BUT I WANTED TO ADD MY NAME
_0	-142-

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1 2 3	TO WHAT I AM SURE IS A LONG LIST OF PEOPLE WITH THE SAME COMPLAINT. <u>DOES</u> <u>SOMEBODY HAVE TO DIE BECAUSE OF THIS ISSUE BEFORE IT IS ADDRESSED?</u> 1 Affected Product
4	
4 5	December 26, 2017 NHTSA ID NUMBER: 11056574 Components: STEERING, SUSPENSION, WHEELS
6	NHTSA ID Number: 11056574 Incident Date December 23, 2017
7	Consumer Location OKLAHOMA CITY, OK
8	Vehicle Identification Number 1FT7W2BT9FE**** Summary of Complaint
8 9	CRASHNo FIRENo
-	INJURIES0
10	<b>DEATHS0</b> WHILE DRIVING DOWN THE INTERSTATE UNDER NORMAL CONDITIONS, THE TRUCK
11	UNEXPECTEDLY STARTS WHAT IS CALLED THE "DEATH WOBBLE". THE STEERING
12	WHEEL AND THE TRUCK STARTS TO SHAKE UNCONTROLLABLY, AND THE ONLY SOLUTION TO FIX THE PROBLEM IS COME TO A VERY SLOW SPEED OR A DEAD STOP.
13	THIS IS VERY UNSAFE, ESPECIALLY WHEN IT HAPPENS ON A MAJOR INTERSTATE.
14	THERE ARE A TON OF COMPLAINTS OUT THERE REGARDING THIS MATTER, AND SEVERAL VIDEOS OUT THERE REGARDING THIS MATTER. FORD NEEDS TO ISSUE A
15	RECALL ON THIS MATTER, AS IT IS EXTREMELY UNSAFE, AND SOMEONE WILL BE
16	<b>INJURED OR DIE BECAUSE OF THIS.</b> MY TRUCK IS PAMPERED, AND ONLY HAS 55K ON IT, SO THIS ISN'T BECAUSE OF ABUSE.
17	1 Affected Product
18	
19	June 5, 2018 NHTSA ID NUMBER: 11099958
20	Components: STEERING, WHEELS NHTSA ID Number: 11099958
21	Incident Date May 31, 2018 Consumer Location SUGAR HILL, NH
22	Vehicle Identification Number 1FT8X3BT7FE****
23	Summary of Complaint CRASHNo
24	FIRENo
25	INJURIES0 DEATHS0
	DEATH WOBBLE MANY TIMES. VEHICLE IS COMPLETELY OUT OF CONTROL. NOT COOL
26	IN HEAVY TRAFFIC ON WAY TO BOSTON (65 MPH). TIRES ARE PROPERLY INFLATED. VEHICLE HAS BEEN HAVING PROBLEM SINCE 45,000 MILES AND NOW HAS 55,000 MILES
27	ON IT. DEALER HAS ONLY MADE "SUGGESTIONS" ON WHAT TO DO TO CORRECT PROBLEM. WORRIED I WILL BE KILLED OR KILL SOMEONE WHEN DRIVING THIS
28	VEHICLE.
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	Class Action Complaint Case No.

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1 2	1 Affected Product
3	October 20, 2018 NHTSA ID NUMBER: 11141552
4	Components: STEERING NHTSA ID Number: 11141552
5	Incident Date October 14, 2018
6	Consumer Location GROTON, CT Vehicle Identification Number 1FT7X2B69GE****
7	Summary of Complaint CRASHNo
8	FIRENo
9	INJURIES0 DEATHS0
10	MY TRUCK, WITH 41,000 MILES , IS SUFFERING WHATS BEING REFERRED TO ONLINE AS THE " DEATH WOBBLE ". THE SYMPTOMS BEGAN AT AROUND 21,000 MILES AND IT HAS
11	GROWN STEADILY WORSE. IT HAPPENS WHEN HITTING BUMPS OR BRIDGE EXPANSION
12	JOINTS AT HIGHWAY SPEED, FORCING ME TO SLOW TO APPROX 20 MPH TO REGAIN CONTROL, WHICH IS VERY UNSAFE ON A CROWDED HIGHWAY. THE DEALER I
13	PURCHASED THE TRUCK FROM NEW SAID IT IS NOT A WARRANTY ITEM AND MAY NOT EVEN BE COVERED UNDER MY ADDITIONALLY PURCHASED 10 YEAR 100,000 MILE
14	EXTENDED WARRANTY. THE TRUCK IS ESSENTIALLY UNSAFE AT HIGHWAY SPEEDS
15	AND MY WIFE WONT EVEN RIDE IN IT. FORD IS IGNORING A HUGE PROBLEM WITH THEIR PRODUCT , PEOPLE HAVE ALREADY BEEN HURT , SOMEONE IS GOING TO BE
16	KILLED! PLEASE HELP!! I HAVE AN APPOINTMENT AT THE DEALERS SERVICE
17	DEPARTMENT FOR TUEDAY , 10-23-18. THEY HAVE INFORMED ME THAT ANY WORK THEY DO MAY BE ON MY DIME , WHICH JUST BLOWS MY MIND. AGAIN , <u>PLEASE</u>
18	INTERJECT INTO THIS ISSUE BEFORE SOMEONE IS KILLED AND TO SAVE THE BUYERS FROM HAVING TO PAY FORD TO ADDRESS THIS OBVIOUS ENGINEERING
19	MISTAKE. 1 Affected Product
20	
21	December 14, 2018 NHTSA ID NUMBER: 11161469
22	Components: STEERING, SUSPENSION
23	NHTSA ID Number: 11161469 Incident Date December 1, 2018
24	Consumer Location PITTSFORD, NY Vehicle Identification Number 1FT8W3DTXGE****
25	Summary of Complaint
26	CRASHNo FIRENo
27	INJURIES0 DEATHS0
28	POPULARLY REFERRED TO AS "DEATH WOBBLE". AT SPEEDS ABOVE 50 MPH, THE
	TRUCK INSTANTLY GOES FROM FULL CONTROL TO AN UNCONTROLLED STATE OF -144-
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	Case No.

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1 2 3 4 5 6 7 8 9 10 11	SEVERE OSCILLATION THAT CAN ONLY BE STOPPED BY STOPPING OR SLOWING THE VEHICLE TO 10 MPH OR LESS. THERE IS NO PRIOR WARNING THAT THIS IS ABOUT TO OCCUR AND IT DOES NOT OCCUR ALL THE TIME - EXTREMELY RANDOM - USUALLY OCCURS WHEN THE TRUCK HITS A ROUGH PATCH OF ROAD OR A BRIDGE/PAVEMENT EXPANSION JOINT. THE CONDITION IS MANIFESTED BY VIOLENT SHAKING OF THE FRONT END ACCOMPANIED BY THE STEERING WHEEL BEING JERKED OUT OF THE DRIVER'S HANDS, RESULTING IN COMPLETE LOSS OF STEERING CONTROL. THIS CAUSES AN EXTREMELY HAZARDOUS CONDITION FOR OTHER VEHICLES AS WELL AS THE PROBLEM TRUCK. FORD HAS ISSUED A TSB FOR THIS PROBLEM 18-2258, CONSISTING OF A REPLACEMENT STEERING DAMPENER AND VARIOUS ALIGNMENT COMPONENTS. THIS "KIT", INSTALLED BY A FORD DEALER INTO MY VEHICLE, HAD ABSOLUTELY NO EFFECT ON THE PROBLEM AND IN FACT IT OCCURRED TWICE SINCE INSTALLATION. THUS FAR, IT HAS HAPPENED A TOTAL OF FOUR TIMES WITH MY TRUCK, AN F350-2016. <u>THIS PROBLEM IS SEVERE, IT IS EXTREMELY DANGEROUS</u> <b>AND SOONER OR LATER, SOMEONE WILL BE INJURED OR KILLED.</b> FOR THE FHTSA - I HAVE DASHCAM MOVIES OF THIS. <b>1 Affected Product</b>
<ol> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	January 29, 2018 NHTSA ID NUMBER: 11065587 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 11065587 Incident Date November 25, 2017 Consumer Location LOUDONVILLE, OH Vehicle Identification Number 1FT7W2B62HE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 DEATHS0 DEATHS0 DEATH WOBBLE WHEN DRIVING AT SPEEDS OF 65 TO 70 ON HIGHWAY IF YOU HIT ANY KIND OF BRIDGE OR BUMP IN ROAD THE VEHICLE SHAKES VIOLENTLY LIKE A WHEEL HAS FALLEN OFF YOU HAVE TO COME DOWN TO 20MPH OR STOP TO REGAIN CONTROL I HAVE ONLY 19000 MILES ON MY TRUCK AND THIS HAS HAPPENED 4 TIMES NOW <u>THIS IS GOING TO KILL SOME ONE NEEDS FIXED.</u> HAVE HAD IT TO DEALERSHIP 3 TIMES ON MY WAY FOR 4 TH TODAY . I BOUGHT A NEW TRUCK TO FEEL SAFE AND I AM AFRAID TO DRIVE IT NOW. 1 Affected Product
25 26 27 28	November 30, 2018 NHTSA ID NUMBER: 11155263 Components: SUSPENSION NHTSA ID Number: 11155263 Incident Date November 30, 2018 Consumer Location HESPERIA, CA Vehicle Identification Number 1FT7W2B67HE**** -145- Class Action Complaint Case No.

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1 2	Summary of Complaint CRASHNo FIRENo	
3	INJURIES0 DEATHS0	
4	WHILE DRIVING AT FREEWAY SPEEDS TODAY I CROSSED A ROUGH SPOT ON THE	
5	FREEWAY. MY STEERING BEGAN TO SHAKE VIOLENTLY FROM LEFT TO RIGHT AND THE TRUCK STARTED VIOLENTLY SHAKING. IF IT HADN'T BEEN FOR LIGHT TRAFFIC	
6	ALLOWING ME TO MOVE OVER TO THE SHOULD QUICKLY THEN I WOULD HAVE LOST	
7	CONTROL OF THE TRUCK. IT WAS TERRIFYING. AFTER DOING A QUICK SEARCH ONLINE ABOUT THE PROBLEM I FOUND NUMEROUS WEB PAGES ADDRESSING THIS ISSUE. WHY	
8	HAS THIS NOT BEEN ADDRESSED? <u>NO ONE IS GETTING HELP FROM FORD. SOME ONE</u>	
	IS GOING TO DIE. 1 Affected Product	
9	T Affected Product	
10		Î
11	January 10, 2019 NHTSA ID NUMBER: 11166300 Components: SUSPENSION	
12	NHTSA ID Number: 11166300	
13	Incident Date January 7, 2019 Consumer Location MUNCY, PA	
14	Vehicle Identification Number 1FT7W2BTXHE****	
	Summary of Complaint	
15	CRASHNo	
16	FIRENo INJURIES0	
17	DEATHSO	
	WHILE TRAVELING ABOUT 60 MPH ON A RURAL ROAD THE TRUCK FRONT END	
18	STARTED SHAKING RAPIDLY. STEERING WHEEL VIOLENTLY JERKED OUT OF MY HAND. TRUCK WAS VERY HARD TO CONTROL AND RAPID BRAKING WAS REQUIRED IN ORDER	
19	TO REMAIN IN CONTROL. VEHICLES TRAVELING BEHIND ME ALSO HAD TO RAPIDLY	
20	BRAKE TO AVOID HITTING ME. CHECKED THE TRUCK OUT AND FOUND NOTHING	
21	LOOSE OR OBVIOULSY BROKEN. WENT ON MY WAY. TRUCK NOW DOES THIS SEVERAL TIMES DAILY WHILE DRVING. EXTREMELY DANGEROUS. SOMEONE IS GOING TO GET	
22	KILLED DUE TO THIS ISSUE, ITS JUST A MATTER OF TIME. AFTER SOME RESEARCH I	
	CAN SEE THAT THIS IS A KNOWN ISSUE REFERRED TO AS "DEATH WOBBLE". TWO OTHERS I KNOW OF WITH BRAND NEW TRUCKS ARE ALSO HAVING THESE ISSUES. I	
23	TOOK MY TRUCK TO DEALER AT 7,000 MILES COMPLAINING ABOUT "CHATTER" IN THE	
24	FRONT END WHEN HITTING BUMPS. THEY STATED NOTHING WRONG, AND NOW AT	1
25	14,000 MILES I AM EXPERIENCING THIS VIOLENT SHAKE. I NO LONGER FEEL SAFE DRIVING THIS TRUCK, AND IT APPEARS FORD ISNT FIXING THE ISSUE, ALTHOUGH I DO	
26	HAVE A CALL IN TO THE DEALER. FORD APPEARS TO BE SLAPPING A NEW STEERING	
27	DAMPER ON THE VEHICLE TO MASK THE PROBLEM FOR A NUMBER OF MILES UNTIL IT WILL RETURN. A STEERING DAMPER IS DESIGNED TO PREVENT THIS ISSUE FROM	
28	HAPPENING ON OLD OR WORN FRONT END PARTS. THIS SHOULD NOT HAPPEN ON A	
	146	1

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1 2 3	NEW TRUCK UNDER ANY CIRCUMSTANCE, EVEN WITH NO STEERING DAMPER. <u>THIS</u> <u>ISSUE NEEDS A RECALL BEFORE SOMEONE IS KILLED.</u> 1 Affected Product
_	
4	February 4, 2019 NHTSA ID NUMBER: 11174271 Components: STEERING, SUSPENSION
	NHTSA ID Number: 11174271 Incident Data January 21, 2010
6	Incident Date January 31, 2019 Consumer Location HOPE MILLS, NC
7	Vehicle Identification Number 1FT7W2B60HE****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0 DEATHS0
11	UNCONTROLLED "DEATH WOBBLE" WHEN DRIVING OVER 45 MPH. THIS OCCURS WHEN
	THE FRONT OF THE VEHICLE BEGINS TO OSCILLATE VIOLENTLY, WHICH CAUSES THE
12	TRUCK TO SHAKE (WOBBLE) IN AN EXTREMELY UNCONTROLLABLE MANNER. SINCE THE DEATH WOBBLE USUALLY OCCURS AT HIGH SPEEDS, <b>IT IS EXTREMELY</b>
13	DANGEROUS AND COULD POTENTIALLY CAUSE THE VEHICLE TO TURN INTO
14	ADJACENT VEHICLES CAUSING FATALITIES. THE ONLY WAY TO RECOVER FROM A
	DEATH WOBBLE IS TO UNEXPECTEDLY SLOW DOWN, WHICH IS ALSO DANGEROUS TO
15	NEIGHBORING VEHICLES ESPECIALLY WHEN TRAVELING AT HIGH SPEEDS. IN MY
16	PARTICULAR CASE, THIS OCCURRED WHILE TRAVELING AT 70MPH ON AN INTERSTATE, AT NIGHT, AND DURING INCLEMENT WEATHER. I WAS DRIVING STRAIGHT AND AFTER
17	DRIVING ONTO A ROAD-BRIDGE TRANSITION, THE VEHICLE BEGAN TO SUDDENLY
	VIOLENTLY SHAKE, AND THE STEERING WHEEL ROCKED BACK AND FORTH. I WAS
18	FORCED TO SLOW DOWN AND ALL THE VEHICLES AROUND ME HAD TO TURN INTO THE
19	MEDIAN TO AVOID HITTING MY VEHICLE. I CHECKED MY VEHICLE FOR DAMAGED
20	TIRES OR DEBRIS UNDERNEATH AND FOUND NO SUCH DEBRIS OR DAMAGE. THE NEXT DAY I DROVE TO THE DEALERSHIP AND THE SERVICE DEPARTMENT KNEW OF TSB 18-
20	2268. I SHOULD HAVE BEEN NOTIFIED OF THIS PROBLEM BECAUSE IT ALMOST
21	KILLED ME AND MY CHILDREN.
22	1 Affected Product
23	
24	November 18, 2018 NHTSA ID NUMBER: 11152254
25	Components: STEERING NHTSA ID Number: 11152254
25	Incident Date November 17, 2018
26	Consumer Location SYRACUSE, UT
27	Vehicle Identification Number 1FT7W2B65HE****
28	Summary of Complaint CRASHNo
20	FIRENO
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	Case No.

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1 2 3 4 5 6 7 8 9 10 11 12 13	INJURIES1 DEATHS0 17 NOV 2018, WIFE AND I WERE TRAVELING SB ON I-15 NEAR BOUNTIFUL, UT GOING ABOUT 70MPH WHEN I WENT OVER A BUMP (WHERE THE ROAD TURNS INTO A BRIDGE). THE VEHICLE IMMEDIATELY STARTED TO DO A DEATH WOBBLE AND WE LOST CONTROL OF THE VEHICLE. BREAKS WERE VERY SLUGGISH DUE TO THE FRONT TIRES NOT MAKING CONTACT WITH THE ROAD. WE WERE ABLE TO REGAIN CONTROL AND PULL OVER AND INSPECT THE TIRES TO FIND NOTHING WRONG. WE TOOK THE TRUCK TO LES SCHWAB WHERE THEY INFORMED US THAT WE HAVE SEVERAL LOOSE AND BROKEN PARTS. THE DEALERS WERE CLOSED OR UNABLE TO GET US IN ON SATURDAY. THE TRUCK IS A 2017 F-250 CREW CAB, 100% STOCK. IF I WAS PULLING A TRAILER, I WOULD HAVE LOST COMPLETE CONTROL AND WOULD HAVE BEEN IN AN ACCIDENT. <u>THIS IS A MAJOR SAFETY ISSUE IF THIS TRUCK CANNOT GO DOWN A</u> HIGHWAY WITHOUT A DEATH WOBBLE. SOMEONE OF LESSER DRIVING SKILL WILL NOT KNOW WHAT TO DO AND THIS TRUCK COULD KILL SOMEONE. VIDEO OF THE EVENT: HTTPS://WWW.YOUTUBE.COM/WATCH?V=JQFTGQKDKPG YOU CAN SEE IN THE VIDEO THAT AS SOON AS I CROSS OVER THE BRIDGE, THE TRUCK REACTS TO IT AND STARTS TO VIOLENTLY SHAKE. THE HOOD CAN CLEARLY BE SEEN VIBRATING AND THE DASH CAM RECORDS AND SAVED THE EVENT AS A CRASH. 1 Affected Product
14         15         16         17         18         19         20         21         22         23         24         25	December 23, 2018 NHTSA ID NUMBER: 11163232 Components: STEERING NHTSA ID Number: 11163232 Incident Date December 23, 2018 Consumer Location WHITE PINE, TN Vehicle Identification Number 1FT7W2BT4HE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 DEATHS0 DEATHS0 DEATH WOBBLE OCCURRED TODAY WITH ME AND MY WIFE AND KIDS GOING DOWN THE HIGHWAY AT 60 MPH AFTER CROSSING A BRIDGE. SCARED MY WIFE TILL THE POINT SHE WAS CRYING. FORD REALLY NEEDS TO RECALL THIS BEFORE SOMEONE GETS KILLED. LUCKILY THERE WAS NO CARS AROUND ME OR THERE WOULD HAVE BEEN A BAD WRECK. 1 Affected Product
23 26 27 28	February 3, 2019 NHTSA ID NUMBER: 11173771 Components: STEERING NHTSA ID Number: 11173771 Incident Date February 2, 2019 Consumer Location BEARDSTOWN, IL -148- Class Action Complaint Case No.

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1	Vehicle Identification Number 1FT7X2BT8HE****
2	Summary of Complaint CRASHNo
3	FIRENo
4	INJURIES0 DEATHS0
5	?DEATH WOBBLE? STEERING WHEN A ROAD BUMP ENCOUNTERED. FRONT SREERING
6	DAMPER HAS BEEN REPLACED TWICE (2 TIMES) PREVIOUSLY, BUT THE ALMOST UNCONTROLLABLE FRONT END SHIMMY IS BACK. HAVE NEVER HAD A FORD TRUCK
Ū	WITH THIS SORT OF PROBLEM. DON?T KNOW IF IT?S JUST THE DAMPENER, OR
7	COMBINATION OF INADEQUATE SHOCKS/SUSPENSION, BUT IT?S DANGEROUS TO DRIVE. FORD MUST BE HELD ACCOUNTABLE FOR THIS DESIGN DEFECT! I TAKE IT
8 9	BACK TO THE DEALER TOMORROW FOR A 3RD ATTEMPTED FIX. VEHICLE NOW HAS 40,000 MILES, BUT, AS I SAID, THIS IS THE 3RD TIME FOR REPLACEMENT. SOMETHING
	STRUCTURALLY IS CAUSING THE STEERING ISSUE. I HOPE IT DOESN?T TAKE
10	FATALITIES FOR FORD TO FIND A SOLUTION.
11	1 Affected Product
12	
13	February 5, 2019 NHTSA ID NUMBER: 11174349 Components: STEERING
14	NHTSA ID Number: 11174349
14	Incident Date February 3, 2019
15	Consumer Location CALDWELL, ID
16	Vehicle Identification Number 1FT7W2BT6HE****
16	Summary of Complaint
17	CRASHNo
10	FIRENo
18	INJURIES0
19	DEATHS0
17	TYPICAL HIGHWAY DRIVING OVER MINOR ABNORMALITIES IN ROADWAY AT SPEEDS
20	OVER 50 MPH CAN CAUSE THE STEERING TO SHAKE VIOLENTLY AND WILL CONTINUE
21	UNLESS/UNTIL YOU BRAKE NEARLY TO A STOP. THIS HAPPENS WITHOUT WARNING
	AND HAS NEARLY CAUSED SEVERAL COLLISIONS BY ME PERSONALLY. THERE IS NO STEERING CONTROL UNTIL YOU HAVE BROUGHT THE VEHICLE TO A STOP. THIS
22	CONDITION IS COMMONLY KNOWN AS A DEATH WOBBLE. FORD HAS A TSB ON IT BUT
23	THEY ARE SIMPLY REPLACING DEFECTIVE PARTS TO GET PAST THE WARRANTY PERIOD AND NOT SOLVING THE TRUE CAUSE OF THE PROBLEM. <b>IF NOT CURED</b>
24	PROPERLY, LIVES WILL BE LOST BECAUSE OF THIS KNOWN FLAWED DESIGN.
25	PLEASE DON'T LET THIS KILL ANYONE (ELSE?)!!!
26	1 Affected Product
27	
	July 29, 2018 NHTSA ID NUMBER: 11114415 Components: SUSPENSION
28	NHTSA ID Number: 11114415
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1 2 3 4 5 6 7 8	Incident Date June 7, 2018 Consumer Location CRYSTAL, MN Vehicle Identification Number 1FT8W3BT0HE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 "2017 SUPERDUTY DEATH WOBBLE" THURSDAY, JUNE 7TH 2018 WHILE DRIVING AT HIGHWAY SPEED (55 MPH) AND GOING OVER VERY MILD BUMPS IN THE HIGHWAY, THE STEERING WHEEL WOULD SHAKE VIOLENTLY AND UNCONTROLLABLY WHILE THE WHOLE VEHICLE SHUTTERED ENOUGH TO OPEN THE GLOVE COMPARTMENT AND EMPTY ITS CONTENTS ALONG WITH EVERYTHING IN THE CENTER CONSOLE. I HAD NO
9 10	CONTROL OF THE VEHICLE TO KEEP IT IN MY LANE AND I LEFT THE ROAD FOR THE DITCH. WHEN APPLYING THE BRAKES, THE ANTILOCK WAS ACTIVATED AND DID EVENTUALLY COME TO A STOP. TWO WITNESSES STOPPED TO MAKE SURE I WAS OK
1 12	AND SAID IT APPEARED AS THOUGH THE FRONT END WAS COMING OFF THE VEHICLE. THE VEHICLE WAS DRIVEN TO THE NEXT EXIT (ABOUT 5 MILES) AND THIS ISSUE REPEATED THREE MORE TIMES AT SLOWER SPEEDS. THE VEHICLE WAS TOWED 80 MILES AND A REPAIR WAS PERFORMED TO THE STABILIZER SHOCK THAT TOOK A FULL
13 14 15	WEEK. IT IS NOW 7/29/2018 AND THE VEHICLE IS SHOWING SIGNS OF THE SHAKE AGAIN BUT MILD IN NATURE. I HAVE HAD THIS SAME ISSUE ON OLDER VEHICLES BUT NEVER ON A NEW VEHICLE WITH UNDER 30,000 MILES ON IT. <u>THIS ISSUE WILL KILL</u> SOMEONE SOMEDAY.
16 17	1 Affected Product
18 19	<ul> <li>B. Ford's Knowledge of the Suspension Defect</li> <li>36. Defendant has significant and long-standing knowledge of the Defect described herein.</li> <li>Upon information and belief. Defendant Ford, through (1) their own records of customers' complaints.</li> </ul>

Upon information and belief, Defendant Ford, through (1) their own records of customers' complaints, (2) dealership repair records, (3) records from the National Highway Traffic Safety Administration ("NHTSA"), (4) warranty and post-warranty claims, (5) pre-sale durability testing and part sales, and (6) other various sources, were aware of the Defect.

37. Defendant routinely monitors the internet for complaints similar in substance to those quoted below. Defendant's customer relations department routinely monitors the internet for customer complaints, and Defendant has retained the services of third-parties to do the same. Further, the customer relations division regularly receives and responds to customer calls concerning, *inter alia*, product defects. Through these sources, Defendant was made aware of the Defect. The complaints also indicate Defendant's knowledge of the defect and its potential danger.

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38. Moreover, Defendant should have known of the Defect because of the sheer number of reports relating to the Defect causing a sudden loss of steering control, a violent front-end vibration and swaying of the Vehicles. For instance, Defendant's customer relations department, which interacts with Ford-authorized service technicians in order to identify potentially widespread vehicle problems and assist in the diagnosis of vehicle issues, has received numerous reports of the Defect causing a sudden loss of steering control, a violent front-end vibration and swaying of the Vehicles. Customer relations also collects and analyzes field data including, but not limited to, repair requests made at dealerships and service centers, technical reports prepared by engineers that have reviewed vehicles for which warranty coverage is requested, parts sales reports, and warranty claims data.

39. Defendant's warranty department similarly reviews and analyzes warranty data submitted by its dealerships and authorized technicians in order to identify defect trends in its vehicles. Defendant dictates that when a repair is made under warranty (or warranty coverage is requested), service centers must provide Defendant with detailed documentation of the problem and the fix that describes the complaint, cause, and correction, and also save the broken parts in case Defendant later determines to audit the dealership or otherwise verify the warranty repair. For their part, service centers are meticulous about providing this detailed information about in-warranty repairs to Defendant because Defendant will not pay the service centers for the repair if the complaint, cause, and correction are not sufficiently described.

40. The NHTSA complaint database is again instructive, as it shows that the Death Wobble Defect has been a significant consistently recurring problem, of which Defendant Ford has been on notice, since 2005. The following table shows the number of complaints regarding he Death Wobble Defect, that NHTSA has received broken down by model and model year:

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MY	Model	# of Complaints	First Complanint	Last Complaint
	F-250			
2005	SD	173	3/10/2005	10/4/2017
	F-350			
2005	SD	78	4/3/2006	9/4/2016
2006	F-250	262	2/25/2007	2/9/2018

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2007

2007

2008

F-350

F-250

F-350

F-250

10/10/2007

4/7/2007

7/21/2008

6/25/2019

4/9/2018

5/7/2018

5/7/2018

11/9/2018

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2008 F-350 24 4/22/2009 7/25/2018 2009 F-250 9/2/2012 26 11/19/2018 2009 F-350 9 10/22/2018 1/5/2012 27 2010 F-250 10/8/2018 5/26/2012 2010 F-350 7 5/23/2014 3/29/2017 2011 F-250 117 11/12/2010 1/22/2019 35 2011 F-350 9/26/2011 9/16/2018 2012 F-250 45 2/17/2013 11/26/2018 2012 F-350 17 12/2/2013 8/14/2016 F-250 11 2013 12/30/2013 1/22/2019 2013 F-350 4 12/20/2016 7/2/2018 13 2014 F-250 4/2/2014 1/10/2019 2014 F-350 5 2/6/2015 8/29/2018 2015 F-250 11 2/3/2016 11/23/2018 2015 F-350 5 10/20/2014 6/5/2018 2016 F-250 6 10/17/2016 10/20/2018 9 2016 F-350 1/15/2017 12/14/2018 2017 F-250 93 10/18/2017 2/5/219 2017 F-350 50 12/4/2017 2/6/2019 2018 F-250 14 9/25/2018 2/2/2019 2018 F-350 5 10/2/2018 2/6/2019 2019 F-250 1 1/7/2019 1265

100

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41. Furthermore, not only can Ford's knowledge be inferred from the fact that 1,265 complaints have been registered on the NHTSA website regarding the Death Wobble Defect in the Class Vehicles, but Ford's knowledge is evidenced by the fact that 73 of those complaints expressly reference that the manufacturer—Defendant Ford Motor Company—was notified of the consumers' concerns.

## 1. NHTSA Consumer Complaints Expressly Referencing Defendant Ford Company Being Notified of the Death Wobble Complaint

42. The following are the consumer complaints submitted to NHTSA that expressly reference Defendant Ford Company being notified of the Death Wobble Complaint:

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1	October 22, 2007 NHTSA ID NUMBER: 10206556
2	Components: STEERING NHTSA ID Number: 10206556
3	Incident Date October 19, 2007
4	Consumer Location BARTO, PA Vehicle Identification Number 1FTNF21515E****
	Summary of Complaint
5	CRASHNo
6	FIRENo INJURIES0
7	DEATHS0
8	TL*THE CONTACT OWNS A 2005 FORD F-250. WHILE DRIVING 65 MPH, THE VEHICLE SHOOK VIOLENTLY AND BECAME DIFFICULT TO STEER AFTER DRIVING OVER A BUMP
9	IN THE ROAD. THE CONTACT STATED THAT IT WAS NOT A NORMAL FRONT END SHAKE
10	AND CONTINUED DRIVING HOME AT A LOWER RATE OF SPEED. THE DEALER ROTATED THE TIRES, BUT THAT DID NOT CORRECT THE FAILURE. <b>THE MANUFACTURER</b>
11	ADVISED HER TO CALL NHTSA AND TO TAKE THE VEHICLE BACK TO THE DEALER.
	THE CURRENT MILEAGE WAS 30,400 AND FAILURE MILEAGE WAS 18,000.  1 Affected Product
12	I Affected Froduct
13	
14	January 4, 2012 NHTSA ID NUMBER: 10442409 Components: STEERING
15	NHTSA ID Number: 10442409
16	Incident Date September 6, 2006 Consumer Location MERIDIAN, MS
17	Vehicle Identification Number 1FTWW31P56E****
18	Summary of Complaint
	CRASHNo FIRENo
19	INJURIES0
20	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2005 FORD F-250. WHILE DRIVING APPROXIMATELY 65 MPH,
21	THE CONTACT DROVE OVER A BUMP AND THE VEHICLE BEGAN TO IMMEDIATELY
22	VIBRATE VIOLENTLY. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER, WHERE BOTH FRONT TIE ROD ENDS WERE REPLACED. THE CONTACT ALSO RECENTLY
23	RECEIVED AN ADVISORY NOTIFICATION LETTER FROM THE MANUFACTURER IN
24	REGARDS TO STEERING WHEEL AND FRONT END VIBRATIONS WHEN DRIVING OVER BUMPY ROAD SURFACES. THE MANUFACTURER ADVISED OWNERS TO MAINTAIN
25	PROPER TIRE INFLATION. THE MANUFACTURER WAS NOTIFIED AND MADE AWARE
	OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 20.
26 27	1 Affected Product
	October 14, 2000 NHTSA ID NILIMBED, 10207246
28	October 14, 2009 NHTSA ID NUMBER: 10287346 Components: STEERING
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1 2 3 4 5 6 7 8 9 10 11 12	NHTSA ID Number: 10287346 Incident Date September 28, 2009 Consumer Location WILMOT, NH Vehicle Identification Number 1FTWF31525E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS 2005 FORD F350 SUPERDUTY. WHILE DRIVING APPROXIMATELY 65 TO 75 MPH, HE HIT A BUMP IN THE ROAD AND THE VEHICLE PROCEEDED TO SHAKE VIOLENTLY CAUSING HIM TO ALMOST LOSE CONTROL OF THE VEHICLE. HE WAS ABLE TO REGAIN CONTROL OF THE VEHICLE WHEN THE SPEED DECREASED TO 30 MPH. AN INDEPENDENT MECHANIC WAS UNABLE TO DIAGNOSE THE FAILURE. THE MECHANIC STATED THAT NOTHING WAS WRONG WITH THE VEHICLE. HE CONTACT NOTIFIED THE MANUFACTURER; HOWEVER, THEY HAVE NOT RESPONDED. THE CURRENT AND THE FAILURE MILEAGES WERE 50,000. 1 Affected Product
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	December 20, 2011 NHTSA ID NUMBER: 10440552 Components: STEERING NHTSA ID Number: 10440552 Incident Date December 20, 2010 Consumer Location MILLER PLACE, NY Vehicle Identification Number 1FTWX31515E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT THE VEHICLE WOULD SHAKE VIOLENTLY WHILE DRIVING OVER 50 MPH. <u>THE</u> <u>MANUFACTURER WAS NOTIFIED OF THE FAILURE, BUT DENIED ANY ASSISTANCE</u> WITH REPAIRS TO THE VEHICLE. THE CONTACT MADE ATTEMPTS TO REPAIR THE FAILURE, BUT THE DEFECT CONTINUOUSLY RECURRED. THE FAILURE MILEAGE WAS 45,000 AND THE CURRENT MILEAGE WAS 60,000. 1 Affected Product
25 26 27 28	January 16, 2013 NHTSA ID NUMBER: 10493165 Components: STEERING NHTSA ID Number: 10493165 Incident Date January 1, 2007 Consumer Location FELTON, CA Vehicle Identification Number N/A -154- Class Action Complaint Case No.

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1	Summary of Complaint CRASHNo
2	FIRENo INJURIESO
3	DEATHS0
4	TL* THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT WHILE
5	DRIVING APPROXIMATELY 60 MPH, THE STEERING WHEEL AND FRONT END OF THE VEHICLE STARTED TO SHAKE. THE CONTACT RELEASED THE ACCELERATOR PEDAL
6	AND THE SHAKING BECAME MORE EXTREME. AFTER DEPRESSING THE BRAKES, THE
7	VEHICLE WAS MOVED OFF THE ROADWAY AND THE CONTACT INSPECTED THE VEHICLE. THE CONTACT FOUND NOTHING LOOSE OR HANGING. THE VEHICLE WAS
8	THEN TAKEN TO A DEALER WHERE THE CONTACT WAS INFORMED THAT THE VEHICLE
	WAS PERFORMING NORMALLY WHEN DRIVING AT HIGHWAY SPEEDS. THE
9	MANUFACTURER WAS CONTACTED BUT OFFERED NO ASSISTANCE. THE FAILURE MILEAGE WAS APPROXIMATELY 20,000. THE CURRENT MILEAGE WAS APPROXIMATELY
10	62,000. THE VIN WAS UNAVAILABLE.
11	1 Affected Product
12	
13	May 5, 2016 NHTSA ID NUMBER: 10863336
14	Components: SUSPENSION, ELECTRONIC STABILITY CONTROL NHTSA ID Number: 10863336
	Incident Date April 28, 2016
15	Consumer Location TEMPLE, TX Vehicle Identification Number 1FTWW33P75E****
16	Summary of Complaint
17	CRASHNo
18	FIRENo INJURIESO
19	DEATHS0
	TL* THE CONTACT OWNS A 2005 FORD F-350. THE CONTACT STATED WHILE DRIVING AT
20	APPROXIMATELY 65 MPH, THE VEHICLE VIOLENTLY SHOOK. THE FAILURE OCCURRED WITHOUT WARNING. THE VEHICLE WAS TAKEN TO INDEPENDENT MECHANIC WHERE
21	IT WAS DIAGNOSED THE VEHICLE HAD A FRONT END OSCILLATION AND THAT TRACK
22	BAR, STABILIZER LINK, AND UPPER AND LOWER BALL JOINTS NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. <b>THE MANUFACTURER WAS NOTIFIED</b>
23	OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 127,000.
24	1 Affected Product
25	
26	March 17, 2010 NHTSA ID NUMBER: 10320462 Components: STEERING
	NHTSA ID Number: 10320462
27	Incident Date March 17, 2009
28	Consumer Location OROVILLE, CA Vehicle Identification Number 1FTSW21P76E****
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1 2 3 4	Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL * THE CONTACT OWNS A 2006 FORD F250. THE CONTACT STATED THAT WHILE TRAVELING AT SPEEDS OF 40 MPH IN CLEAR WEATHER CONDITIONS, THE ENTIRE
5 6 7 8 9 10	FRONT END OF THE VEHICLE WOULD SHAKE EXCESSIVELY. HE ATTEMPTED TO SHUT OFF AND RESTART THE ENGINE TO CORRECT THE FAILURE TO NO AVAIL. THE FAILURE WOULD OCCUR SEVERAL TIMES WHILE OPERATING THE VEHICLE. <u>THE</u> <u>MANUFACTURER WAS CONTACTED AND ADVISED TAKING THE VEHICLE TO THE</u> <u>DEALER FOR FURTHER INSPECTION.</u> THERE HAD BEEN NO REPAIRS TO THE VEHICLE AS OF YET. THE FAILURE MILEAGE WAS 18,000 AND THE CURRENT MILEAGE WAS 28,000. 1 Affected Product
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> </ol>	April 7, 2014 NHTSA ID NUMBER: 10577858 Components: STEERING NHTSA ID Number: 10577858 Incident Date May 2, 2011 Consumer Location OREFIELD, PA Vehicle Identification Number 1FTSX21536E**** Summary of Complaint CRASHNo FIRENo INJURIES0
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	DEATHS0 TL* THE CONTACT OWNS A 2006 FORD F250. THE CONTACT STATED THAT THERE WAS AN EXTREME VIBRATION IN THE STEERING WHEEL. THE CONTACT DROVE OVER A BUMP OR UNEVEN PAVEMENT WHILE DRIVING THE VEHICLE AT ANY SPEED AND HAD TO USE FORCE IN ORDER TO GAIN CONTROL OF THE STEERING WHEEL ON MULTIPLE OCCASIONS. THE VEHICLE SHOOK VIOLENTLY AND THE STEERING CONTINUED TO BE UNSTABLE. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHO WAS UNABLE TO DIAGNOSE THE FAILURE. THE CONTACT CONTINUED TO EXPERIENCE THE STEERING FAILURE WHICH CAUSED THE VEHICLE TO DRIVE ROUGH. THE VEHICLE WAS TAKEN BACK TO AN AUTHORIZED DEALER WHO WAS UNABLE TO REPLICATE THE FAILURE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 50000. 1 Affected Product
26 27 28	April 19, 2010 NHTSA ID NUMBER: 10326393 Components: STEERING, SUSPENSION NHTSA ID Number: 10326393 Incident Date April 17, 2010 -156- Class Action Complaint Case No.

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1	Consumer Location SHELTER ISLAND, NY Vehicle Identification Number 1FTSX21516E****
2	Summary of Complaint
3	CRASHNo FIRENo
4	INJURIES0 DEATHS0
5	2006 FORD F-250 SUPER DUTY GAS 5.4L V8 I WAS ON THE HIGHWAY DRIVING AROUND
6	70 WHEN I HIT A POT HOLE THE STEERING WHEEL JERKED LIKE NORMAL BUT THEN ALL OF A SUDDEN THE TRUCK STARTED TO SHAKE VIOLENTLY. I STARTED TO SLOW
7	DOWN AS FAST AS POSSIBLE, I THOUGHT I HAD A FLAT. I WAS BARELY ABLE TO GET
8	OFF THE ROAD WITH OUT CAUSING AN ACCIDENT. I SPENT ABOUT AN HOUR TRYING TO FIGURE OUT WHAT HAPPENED. WITH NO FINDINGS I STARTED TO DRIVE HOME
9	VERY SLOWLY AFRAID TO GO OVER 50. I TYPED IN GOOGLE.COM FORD F250 SHAKING AND WAS AMAZED THAT THERE WAS A MAJOR PROBLEM OUT THERE AND FORD IS
10	DOING NOTHING ABOUT IT. I JUST CALLED FORD MOTOR COMPANY AND WAS
11	GIVEN A CASE NUMBER. ALL THE DEALERSHIP BLAME IT ON TIRE PRESSURE. AND MOST OF THEM STATE THAT THE PRESSURE NEEDS TO BE GREATER THEN LISTED ON
12	THE DOOR OF THE TRUCK. I AM TRULY AMAZED I WAS NOT HURT OR EVEN MORE AMAZED OF THE QUICK THINKING OF THE DRIVERS AROUND ME, GOING FROM 70 PLUS
13	TO ABOUT 30 IN A FEW SECONDS. FROM WHAT I AM READING THE HAVE BEEN
14	ARTICLES IN A FEW MAJOR MAGAZINES AND TV SHOWS REGARDING THIS ISSUE. I AM NOW GOING TO INCREASE MY TIRE PRESSURE AND SEE IF THAT CURES THE PROBLEM,
15	IF NOT I AM GOING TO BE FORCED TO BUY AFTER MARKET PARTS TO FIX THE
16	PROBLEM, COSTING \$ 1,000 MIN. I DON'T MIND THE PRICE FOR THE SAFETY OF MY WIFE AND PASSENGERS. BUT I
17	WOULD THINK THAT FORD MOTOR COMPANY WOULD STAND BEHIND THERE
18	PRODUCT. ON THIS DAY IT HAPPENED 2 TIMES ON A 100 MILE TRIP, I AM NOW DEATHLY AFRAID TO DRIVE IT ON THE HIGHWAY, OR EVEN TAKE A PASSENGER WITH
19	ME, OTHER THEN THAT HAPPENING AT HIGHWAY SPEEDS, THE VEHICLE HANDLES GREAT AND NO PROBLEMS. *TR
20	1 Affected Product
21	
22	June 26, 2009 NHTSA ID NUMBER: 10275011
23	Components: STEERING NHTSA ID Number: 10275011
23 24	Incident Date April 2, 2009
24 25	Consumer Location Unknown Vehicle Identification Number 1FTSW21P46E****
	Summary of Complaint CRASHNo
26	FIRENO
27	INJURIES0 DEATHS0
28	
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1 2 3 4 5	WHEN DRIVING WHEN YOU GO OVER A BUMP ,RXR CROSSING OR MAN HOLE COVER THE FRONT END OF THE VEHICLE SEVERELY SHAKES TO THE POINT YOU HAVE TO JAM ON THE BRAKES OR WRECK. I REPLACED THE STEERING STABILIZER AS INSTRUCTED TO BUT THE OUTCOME HAS NOT CHANGED. <u>I HAVE CALLED FORD NUMEROUS</u> <u>TIMES,BOTH THE DEALER AND FORD MANUFACTURER. THEY BOTH ACT LIKE</u> <u>THEY HAVE NEVER HEARD OF THIS SEVERE PROBLEM.</u> *TR 1 Affected Product
6 7 8 9	December 13, 2011 NHTSA ID NUMBER: 10439726 Components: STEERING NHTSA ID Number: 10439726 Incident Date December 12, 2009 Consumer Location ERIE, PA
10 11 12 13	Vehicle Identification Number 1FTFX21536E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO
14 15 16 17	TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT WAS DRIVING 60 MPH AND DROVE OVER A ROAD BUMP WHEN THE ENTIRE VEHICLE SHOOK EXCESSIVELY. THE VEHICLE WAS TAKEN TO THE DEALER PREVIOUSLY WHO REPLACED THE TIRES, SHOCKS AND OTHER UNKNOWN COMPONENTS, BUT THE VEHICLE CONTINUED TO SHAKE UNCONTROLLABLE. THE DEALER WAS UNABLE TO LOCATE THE PROBLEM. <u>THE</u> <u>MANUFACTURER WAS NOTIFIED OF THE FAILURE WHO INFORMED THE CONTACT</u> <u>TO TAKE THE VEHICLE BACK TO THE DEALER FOR FURTHER TESTING.</u> THE FAILURE MILEAGE WAS 90,000 AND THE CURRENT MILEAGE WAS 109,000.
18 19 20	1 Affected Product January 26, 2012 NHTSA ID NUMBER: 10445440
<ul><li>21</li><li>22</li><li>23</li></ul>	Components: STEERING NHTSA ID Number: 10445440 Incident Date May 2, 2011 Consumer Location Unknown Vehicle Identification Number 1FTSX21516E****
24 25	Summary of Complaint CRASHNo FIRENo INJURIES0
26 27 28	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT STATED THAT THE VEHICLE WOULD VIOLENTLY WOBBLE WHILE DRIVING AT HIGHWAYS SPEEDS. THE DEALER ATTEMPTED TO REPAIR THE VEHICLE, BUT THE FAILURE RECURRED. <u>THE</u>
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1	MANUFACTURER WAS NOTIFIED, BUT DENIED ANY ASSISTANCE WITH REPAIRS. THE FAILURE MILEAGE WAS 37,000 AND THE CURRENT MILEAGE WAS 47,600.
2	1 Affected Product
3	
4	June 5, 2009 NHTSA ID NUMBER: 10272981
5	Components: SUSPENSION NHTSA ID Number: 10272981
6	Incident Date September 13, 2008
7	Consumer Location TWIN BRIDGES, MT Vehicle Identification Number 1FTWW31P36E****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0 DEATHS0
11	TL*THE CONTACT OWNS A 2006 FORD F-350. WHILE DRIVING APPROXIMATELY 65 MPH,
12	THE VEHICLE DROVE OVER A BUMP IN THE ROAD. THE STEERING WHEEL VIBRATED AND SHIMMIED SEVERELY. THE VEHICLE BEGAN TO VEER ACROSS THE ROAD
13	WITHOUT ASSISTANCE. THE FAILURES OCCURRED WHENEVER THE VEHICLE TRAVELED OVER ROUGH ROAD SURFACES. THE VEHICLE WAS TAKEN TO AN
14	INDEPENDENT MECHANIC FOR INSPECTION AND THEY STATED THAT THE FRONT
15	SUSPENSION WAS FAULTY DUE TO A MANUFACTURER DESIGN DEFECT. <u>THE</u> <u>MANUFACTURER WAS NOTIFIED, BUT DID NOT ASSIST.</u> THE CONTACT WAS ADVISED
16	TO CHECK THE TIRE INFLATION PRESSURE. THE CONTACT IS IN THE PROCESS OF
17	TAKING THE VEHICLE TO AN AUTHORIZED DEALER. THE FAILURE MILEAGE WAS 42,000 AND CURRENT MILEAGE WAS 57,000. UPDATED 07/17/09. *LJ UPDATED 07/20/09.*JB
18	1 Affected Product 1 Associated Document
19	
20	February 11, 2014 NHTSA ID NUMBER: 10563867
21	Components: SUSPENSION, STEERING
22	NHTSA ID Number: 10563867 Incident Date May 2, 2011
23	Consumer Location VICHY, MO Vehicle Identification Number 1FTWW33P36E****
23	Summary of Complaint
	CRASHNo FIRENo
25	INJURIES0
26	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2006 FORD F-350. THE CONTACT STATED THAT THE WHILE
27	DRIVING APPROXIMATELY 35 MPH, THE FRONT END OF THE VEHICLE AND THE
28	STEERING WHEEL EXPERIENCED SEVERE VIBRATION AFTER THE CONTACT DROVE OVER A ROAD DIP. THE CONTACT STATED THAT THE DEFECT WOULD RECUR WHEN
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	Class Action Complaint Case No.

1       DRIVING AT ANY SPEED AND ANYTIME THE VEHICLE WAS DRIVEN OVE ROAD WINE. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE FAILURE MILE 60,000.         2       WAS NOTIFIED AND NO SOLUTION WAS OFFERED. THE FAILURE MILE 60,000.         3       IAffected Product         4	AGE WAS
<ul> <li>May 26, 2016 NHTSA ID NUMBER: 10871068</li> <li>Components: SUSPENSION, STEERING</li> <li>NHTSA ID Number: 10871068</li> <li>Incident Date May 20, 2016</li> <li>Consumer Location SANDWICH, MA</li> <li>Vehicle Identification Number 1FTWW31566E****</li> <li>Summary of Complaint</li> <li>CRASHNo</li> <li>FIRENo</li> <li>INJURIES0</li> <li>DEATHS0</li> <li>FORD F-350 2006 OSCILLATION 1 HAVE FILED A PREVIOUS COMPLAINT F</li> <li>VIOLENT OSCILLATION THAT HAPPENS WITH OUR FORD F-350 TRUCK. V</li> <li>MORE EVENTS AT SLOWER SPEEDS AND THE SHAKING IS ALMOST UNM</li> <li>NOW. WEDNESDAY MAY 11 APPROX 1PM EXITING THE BOURNE BRIDGE</li> <li>DRIVING AT APPROX 40MPH AND EXITING THE BRIDGE. THERE WAS A F</li> <li>CONSTRUCTION PATCH ON THE ROAD RIGHT WHERE THE ROAD CONNE</li> <li>BRIDGE. AS I HIT THE ROUGH PATCH, THE OSCILLATION BEGAN AND TH</li> <li>SHOOK UNCONTROLLABLY APPROACHING THE ROTARY. THERE WAS A</li> <li>TRAFFIC AND CARS IN THE LANE BESIDE ME THAT COULD HAVE BEEN IMAY 20, 2016 AT APPROX 55MPH. AS HE PASSED EXIT 6, HE HIT A ROI</li> <li>AND THE TRUCK BEGAN OSCILLATING VIOLENTLY. HE WAS UNABLE TO</li> <li>AND THE TRUCK BEGAN OSCILLATING VIOLENTLY. HE WAS UNABLE TO</li> <li>AND SWERVED IN BOTH LANES OF THE WESTERLY 2-LANE HIGHWAY A</li> <li>AGAINST THE CURB. LUCKILY THE TRAFFIC STOPPED WHEN SEEING HIS</li> <li>CONTROL AND NO ONE WAS HURT OTHER THAN MY HUSBAND BEING T</li> <li>SHAKEN. THE TIRES HAVE BEEN INFLATED AS RECOMMENDED BY FOR</li> <li>SENT A LETTER RE THIS DEFECT. THIS TRUCK IS DANGEROUS, NOT ONI</li> <li>OFHERS WHO ARE ON THE ROAD. 1 HAVE CONTACTED THE PLYMOUTH</li> <li>WHERE THE TRUCK WAS PURCHASED, FORD CUSTOMER SERVICE AND J</li> <li>OFFICE. EVEN THOUGH THEY ACKNOWLEDGE THE TRUCKS ARE DEFECT</li> </ul>	EFORE RE THE
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OFFICE. EVEN THOUGH THEY ACKNOWLEDGE THE TRUCKS ARE DEFEC	FORD DEALER
<sup>24</sup> THEY ARE NOT RESPONSIBLE FOR REPAIRING THEM. OUR TRUCK IS OSC REALLY BADLY AND IS DANGEROUS TO DRIVE. THIS SHOULD BE A REC	ILLATING
<sup>23</sup> FOR THOSE OF US DRIVING THESE DEFECTIVE FORD F-350 2006 TRUCKS,	· · · · · · · · · · · · · · · · · · ·
26 OTHER INNOCENT LIVES ON THE ROAD. 1 Affected Product	
27	
28 June 13, 2016 NHTSA ID NUMBER: 10873902	
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1	Components: SUSPENSION NHTSA ID Number: 10873902
2 3	Incident Date June 5, 2012 Consumer Location STERLINGTON, LA
4	Vehicle Identification Number 1FTWW33P26E**** Summary of Complaint
5	CRASHNo FIRENo
6	INJURIES0 DEATHS0
7	TL* THE CONTACT OWNS A 2006 FORD F-350. WHILE DRIVING 65 MPH OVER BUMPS IN
8	THE ROAD, THE VEHICLE SHOOK VIOLENTLY. THE DEALER DIAGNOSED THAT THE FRONT AXLE FAILED AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT
9	REPAIRED BECAUSE THE REMEDY WAS NOT AVAILABLE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS UNKNOWN.
10	1 Affected Product
11 12	January 16, 2014 NHTSA ID NUMBER: 10560235
12	Components: STEERING
14	NHTSA ID Number: 10560235 Incident Date November 2, 2012
15	Consumer Location THEODORE, AL Vehicle Identification Number 1FTWW33P46E****
16	Summary of Complaint CRASHNo
17	FIRENo INJURIES0
18	DEATHS0
19	DRIVING VEHICLE WITH FIFTH WHEEL 31 FT CAMPER IN TOW VEHICLE LURCHED TO THE LEFT AND ATTEMPTS TO CORRECT FOUND GREAT RESISTANCE IN STEERING
20	RESPONSE. ON SEVERAL OCCASIONS SINCE AND AT NO SPECIFIC SPEED THE VEHICLE WILL LURCH TO THE LEFT OR RIGHT OR SHIMMY TO THE POINT THAT STEERING
21	BECOMES ALMOST UNRESPONSIVE. I HAD THE VEHICLE CHECKED AND WAS ADVISED NOTHING WAS IN NEED OF REPLACEMENT. THEN I RECEIVED A LETTER FROM FORD
22 23	MOTOR CO DESCRIBING THE EXACT STEERING SITUATION THAT I AM EXPERIENCING ALONG WITH RECOMMENDATIONS TO KEEP TIRES INFLATED PROPERLY, WHICH I
23 24	HAVE AND CONTINUE TO HAVE CORRECT. I CONTACTED FORD TO VOICE MY CONCERN
2 <del>4</del> 25	AND WAS ADVISED THIS IS "JUST A NORMAL QUALITY OF A SOLID FRONT AXEL 4 WHEEL DRIVE TRUCK". I USE THIS VEHICLE TO PULL A CAMPER AND WHEN THIS
26	"SEVERE VIBRATION AND OSCILLATION" OCCURS IT CAUSES THE TRUCK/TRAILER TO LURCH SO FAR AS TO CAUSE IT TO SHIFT LANES. THIS PROBLEM OCCURS AT ALL
27	SPEEDS, EVEN HIGHWAY SPEEDS OF 70MPH. I WAS ALSO TOLD THAT THE LETTER WAS ONLY A "NOTIFICATION OF THE SITUATION AND HOW TO AVOID" AND NOT A RECALL.
28	FURTHERMORE, FORD ADVISED THAT I TAKE THE VEHICLE IN TO A FORD DEALER AT MY COST TO ENSURE THAT THIS WAS THE CAUSE OF THE PROBLEM. THIS SITUATION IS
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	Class Action Complaint

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1 2 3 4	SEVERE ENOUGH THAT IT COULD AND PERHAPS HAS BEEN THE CAUSE OF TRAFFIC ACCIDENTS. HOW LONG WILL THIS BE ALLOWED TO GO ON BEFORE A RECALL IS ISSUED? HAVING IDENTIFIED A VEHICLE STEERING PROBLEM, THAT IN MY OPINION COULD BE LIFE THREATENING, SHOULD BE SUFFICIENT CAUSE FOR A RECALL TO BE ISSUED. *TR 1 Affected Product
5 6	May 24, 2009 NHTSA ID NUMBER: 10269838
7	Components: SUSPENSION NHTSA ID Number: 10269838
	Incident Date January 11, 2009
8	Consumer Location Unknown
9	Vehicle Identification Number N/A
10	Summary of Complaint CRASHNo
11	FIRENo
	INJURIES0
12	DEATHSO
13	I HAVE A 2006 FORD F350 CREWCAB SUPERDUTY THAT HAS A SHIMMY / VIBRATION IN CAB OF TRUCK WHICH HAPPENS WHEN I HIT A DIP OR BUMP AND IF I SLOW DOWN
14	SOMETIMES IT GOES AWAY QUICKLY WHEN I SLOW DOWN AND SOMETIMES I HAVE
	SLOW DOWN BELOW 30MPH. HOW SAFE IS THAT ON AN INTERSTATE? I DID RECEIVE A
15	LETTER FROM FORD SAYING THIS COMMON BUT I DISAGREE BECAUSE THIS IS MY
16	THIRD SUPERDUTY AND THE LAST TWO I DID NOT EXPERIENCE THIS PROBLEM BUT THEY HAD DIESEL ENGINES THIS IS GAS. MY DEALERSHIP TOLD FORD CUSTOMER REP
17	THAT I NEED A ROAD WORTHY TEST OR THE DRIVE SHAFT IS OUT OF BALANCE SO
	THEY ARE GUESSING TOO. THE DEALERSHIP DID NOT EVEN KNOW ABOUT THIS LETTER
18	THAT FORD SENT TO SUPERDUTY OWNERS. FORD REP STATED THERE IS NO RECALL ON THIS VEHICLE. THE SERVICE MANAGER AT THE LOCAL DEALERSHIP BELIEVES THE
19	PROBLEM IS BECAUSE A GAS ENGINE IS TOO LIGHT AND THE SUPERDUTYS WERE
20	MADE FOR DIESEL ENGINES. I HAVE NO IDEA HOW TRUE THIS IS BUT MY FIRST TWO
21	SUPERDUTY TRUCKS I HAD WERE DIESEL AND I DID NOT EXPERIENCE THIS. I HAVE
	DRAFTED UP A LETTER TO SEND TO NYS ATTORNEY GENERAL AND TO FORD BUT I AM NOT VERY CONFIDENT ABOUT THE END RESULTS. MY WARRANTY HAS RUN OUT AND
22	NOW IT IS ON MY NICKEL. I EVEN PUT NEW E RATED TIRES ON THE TRUCK IN
23	DECEMBER AND HAS BEEN AT THE DEALERSHIP TWICE WHICH THEY SAID THE TIRES
24	WERE OUT OF BALANCE AND NEEDED TO BE ROTATED. I HAVE LESS THAN 3,000 MILES
	ON THESE TIRES SO THAT DID NOT MAKE ANY SENSE. AS OF THIS DATE THE TIRES HAVE BEEN BALANCED A TOTAL OF THREE TIMES WHICH ABSOLUTELY NO SENSE
25	EITHER. I AM GOING TO GET A SECOND OPINION FROM MY MECHANIC THAT I HAVE
26	BEEN USING FOR OVER 20 YEARS WHICH IS NOT A FORD DEALERSHIP TO SEE IF THE
27	PROBLEM CAN BE RESOLVED SINCE I AM NOT GETTING MUCH HELP FROM FORD OR THE DEALERSHIP. THIS SHIMMY / VIBRATION DOES GET ME NERVOUS AT TIMES AND
28	DO NOT FEEL I AM VERY SAFE IN KEEPING THIS BIG PICKUP UNDER
20	

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1 2 3	CONTROL AND I DO NOT EXCEED THE SPEED LIMIT MORE THAN 5 MPH. I HAVE BEEN A FORD PERSON FOR OVER THIRTY YEARS AND NOW I MAY HAVE TO CHANGE. *TR 1 Affected Product
4	
5	October 15, 2009 NHTSA ID NUMBER: 10288585 Components: STEERING, SUSPENSION
6	NHTSA ID Number: 10288585 Incident Date October 13, 2009
Ŭ	Consumer Location TEWKSBURY, MA
7 8	Vehicle Identification Number 1FDWX37Y86E**** Summary of Complaint
-	CRASHNo
9	FIRENo INJURIES0
10	DEATHS0
11	EXCESSIVE FRONT END SHIMMY ON OCCASION WITH MY FORD F350 4X4. I HAVE RECEIVED A LETTER FROM FORD DISCUSSING THIS ISSUE. THE FIRST TIME THE
12	PROBLEM OCCURRED, MY TIRE PRESSURE WAS LOW AND SUBSEQUENTLY
13	MAINTAINING PROPER TIRE PRESSURE SEEMED TO PREVENT THE PROBLEM FOR A WHILE. HOWEVER, RECENTLY I HIT SOME BUMPS WHILE TRAVELING ON THE
14	HIGHWAY AT A SPEED OF APPROXIMATELY 65 MPH AND THE FRONT END BEGAN TO
	SHIMMY VERY VIOLENTLY. I KNEW TO HIT THE BRAKES TO REGAIN CONTROL OF THE
15	STEERING, BUT I HAD TO STAY ON MY BRAKES UNTIL I SLOWED TO APPROXIMATELY 40 MPH BEFORE I COULD REGAIN CONTROL OF THE STEERING WHEEL. I CALLED A
16	LOCAL FORD SERVICE CENTER, BUT THEY SAID THEY WOULD "ONLY BE GUESSING" AT
17	THE PROPER WAY TO FIX THE PROBLEM. <u>I THEN CALLED FORD CUSTOMER SERVICE</u> TO DISCUSS THE ISSUE, AS I AM NERVOUS ABOUT RIDING ON THE HIGHWAY WITH
18	THE VEHICLE. THEY SUGGESTED THAT I CALL SEVERAL SERVICE CENTERS UNTIL
19	I FIND ONE THAT HAS EXPERIENCE WITH TRYING TO FIX THIS PARTICULAR PROBLEM. I HAVE DONE THAT AND I HAVE FOUND THAT NONE OF THE LOCAL
20	DEALERS KNOW HOW TO CORRECT THE PROBLEM. THIS SHIMMY PROBLEM IS
21	OCCURRING MORE AND MORE OFTEN AND I AM CONVINCED THAT IT WILL
22	EVENTUALLY RESULT IN AN ACCIDENT ON THE HIGHWAY. *TR 1 Affected Product
23	
	July 22, 2009 NHTSA ID NUMBER: 10277958
24	Components: STEERING
25	NHTSA ID Number: 10277958 Incident Date November 12, 2008
26	Consumer Location PIEDMONT, OK
27	Vehicle Identification Number N/A
28	Summary of Complaint CRASHNo
20	FIRENo
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.164 Page 164 of 353
1 2 3 4 5 6 7 8 9 10	INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2006 FORD F-350 SD. THE CONTACT STATED THAT HE EXPERIENCED MULTIPLE FAILURES WITH THE VEHICLE SHAKING VIOLENTLY. WHILE DRIVING 70 MPH, THE VEHICLE BEGAN TO SHIMMY AND SHAKE VIOLENTLY. HE REDUCED THE SPEED TO 40 MPH AND THE SHAKING CEASED. HE IS IN THE PROCESS OF TAKING THE VEHICLE TO THE DEALER FOR FURTHER INSPECTION. <u>THE MANUFACTURER IS AWARE OF THE FAILURE, BUT WILL NOT PROVIDE</u> <u>COMPENSATION BECAUSE THE VEHICLE WAS NOT INCLUDED IN A RECALL AND</u> <u>THE WARRANTY WAS EXPIRED.</u> THE CONTACT BELIEVES THAT THE FAILURE COULD POSSIBLY LEAD TO ADDITIONAL FAILURES REGARDING THE BALL JOINTS, TIE ROD, AND ANYTHING DEALING WITH THE STEERING DUE TO THE VIOLENT SHAKING. THE VIN WAS UNAVAILABLE. THE FAILURE MILEAGE WAS 34,000 AND CURRENT MILEAGE WAS 62,000. <b>1 Affected Product</b>
11 12	May 28, 2013 NHTSA ID NUMBER: 10513794 Components: STEERING, WHEELS, STRUCTURE, SUSPENSION NHTSA ID Number: 10513794
13 14	Incident Date May 26, 2013 Consumer Location AUSTIN, TX Vehicle Identification Number 1FTSW21537E****
15 16 17	Summary of Complaint CRASHNo FIRENo INJURIES0
17 18 19	<b>DEATHSO</b> I WOULD LIKE TO OFFICIALLY SUBMIT A COMPLAINT ABOUT OUR FORD F250 SUPER DUTY TRUCK. THERE IS SOMETHING SERIOUSLY WRONG WITH IT AND THE FORD
20	DEALERSHIP HAS BEEN UNABLE TO FIX IT. WE HAVE HAD THE SAME ISSUE WITH IT FOR THE LAST FEW YEARS AND THE ISSUE HAS NOT BEEN RESOLVED! WE ARE
21	EXPERIENCING TURBULENT WOBBLING WITH THIS TRUCK AND I CAN ASSURE YOU THIS IS NOT NORMAL! THE LAST INCIDENT OCCURRED 2 DAYS AGO ON MAY 26, 2013! I HAVE CHILDREN AND FEEL THAT OUR LIVES WERE ESPECIALLY IN DANGER WHEN WE
22 23	RODE IN THIS TRUCK AS WE THOUGHT THIS ISSUE WAS RESOLVED AND NO LONGER EXISTED. AS WE WERE DRIVING ON THE INTERSTATE HIGHWAY WE DROVE OVER AN
24	UNEVEN SECTION OF THE HIGHWAY AND OUR TRUCK SUDDENLY STARTED SHAKING DANGEROUSLY OUT OF CONTROL! THANKFULLY MY HUSBAND WAS ABLE TO
25	CONTROL THE STEERING WHEEL AND STEPPED ON THE BRAKE TO SLOW IT DOWN, OTHERWISE WHO KNOWS WHAT WOULD HAVE HAPPENED! THERE WAS TRAFFIC
26	EVERYWHERE AND WE WERE LUCKY ENOUGH NOT TO HAVE AN ACCIDENT! THEN IT HAPPENED AGAIN A FEW HOURS LATER WHEN WE AGAIN DROVE OVER AN UNEVEN
27 28	SECTION OF THE INTERSTATE. I HAVE EXPERIENCED ENOUGH OF THESE THREATENING EPISODES AND I AM VERY CONCERNED AS THIS IS ABSOLUTELY NOT NORMAL AND I CAN HONESTLY SAY THERE IS SOMETHING VERY WRONG WITH THIS VEHICLE. THIS IS
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1 2 3 4 5	A SAFETY ISSUE AND PEOPLE CAN AND WILL LOSE THEIR LIVES OVER THIS IF THIS IS NOT RESOLVED IMMEDIATELY! <u>I HAVE CONTACTED FORD HEADQUARTERS TO</u> <u>SUBMIT A FORMAL COMPLAINT AND THEY MERELY TOLD ME TO CONTINUE</u> <u>WORKING WITH THE DEALERSHIP THAT HAS UNRESOLVED MY ISSUE.</u> I TRUST THAT YOU WILL TAKE THIS COMPLAINT SERIOUSLY AS LIVES ARE AT STAKE BECAUSE OF THIS ISSUE. *TR 1 Affected Product
6 7 8 9	January 27, 2009 NHTSA ID NUMBER: 10256489 Components: STEERING, WHEELS NHTSA ID Number: 10256489 Incident Date October 30, 2007 Consumer Location CITY OF INDUSTRY, CA
10 11 12	Vehicle Identification Number 1FTSW21P47E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> </ol>	TL*THE CONTACT OWNS A 2007 FORD F-250 SD. THE CONTACT NOTICED THAT THE STEERING COLUMN AND WHEELS VIBRATE ABNORMALLY. SPEED WAS NOT A FACTOR DURING THE FAILURES. HIS CONTROL OF THE VEHICLE WAS SIGNIFICANTLY REDUCED. HE TOOK THE VEHICLE TO THE DEALER AND THEY STATED THAT THE FAILURE WAS A NORMAL CHARACTERISTIC OF THE VEHICLE. <u>HE CALLED THE MANUFACTURER AND</u> IS WAITING FOR A RESPONSE. THE FAILURE MILEAGE WAS 300 AND CURRENT MILEAGE WAS 31,100.
17 18 19	1 Affected Product June 28, 2016 NHTSA ID NUMBER: 10877122
<ul> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ul>	Components: STEERING, SERVICE BRAKES NHTSA ID Number: 10877122 Incident Date June 20, 2007 Consumer Location GREENTOWN, PA Vehicle Identification Number 1FTNF21507E**** Summary of Complaint
24 25	CRASHNo FIRENo INJURIES0 DEATHS0
26 27 28	TL* THE CONTACT OWNS A 2007 FORD F-250 SUPER DUTY. WHILE DRIVING AT ANY SPEED, THE VEHICLE SHOOK VIOLENTLY AND CAUSED THE DOOR TO OPEN. IT BECAME DIFFICULT TO STEER AND THE ENTIRE VEHICLE OSCILLATED. IN ADDITION, THE ABS WARNING LIGHT ILLUMINATED. THE VEHICLE WAS TAKEN TO THE DEALER, BUT WAS NOT DIAGNOSED OR REPAIRED. THE FAILURES BEGAN WEEKS AFTER THE VEHICLE
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1 2 3	WAS PURCHASED IN 2007. <u>THE MANUFACTURER WAS NOTIFIED OF THE FAILURE.</u> THE FAILURE MILEAGE WAS APPROXIMATELY 400. 1 Affected Product
4	May 7, 2018 NHTSA ID NUMBER: 11092264
5	Components: SUSPENSION
6	NHTSA ID Number: 11092264 Incident Date May 1, 2018
7	Consumer Location NORTH HAVEN, CT
8	Vehicle Identification Number 1FTWF31567E**** Summary of Complaint
-	CRASHNo FIRENo
9	INJURIES0
10	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2007 FORD F-350. THE CONTACT RECEIVED FIELD ACTION
11	NOTICE NUMBER: 09L02 FROM THE MANUFACTURER. WHILE DRIVING 40 MPH ON
12	BUMPY TERRAIN, THE VEHICLE SHOOK. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE CONTACT CALLED A LOCAL DEALER (BOB THOMAS FORD INC, 2215
13	DIXWELL AVE, HAMDEN, CT 06514, (203) 281-7500) AND WAS INFORMED THAT THERE
14	WOULD BE A DIAGNOSTIC FEE. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED DUE TO THE DIAGNOSTIC FEE. THE MANUFACTURER WAS NOTIFIED AND ADVISED THE
15	CONTACT TO TAKE THE VEHICLE TO THE LOCAL DEALER, AND THAT THERE
16	WOULD BE A CHARGE FOR VEHICLE INSPECTIONS. THE FAILURE MILEAGE WAS APPROXIMATELY 7,000.
17	1 Affected Product
18	
19	October 15, 2010 NHTSA ID NUMBER: 10360616
20	Components: STEERING, SUSPENSION, EQUIPMENT NHTSA ID Number: 10360616
21	Incident Date October 11, 2010 Consumer Location MANASSAS, VA
22	Vehicle Identification Number 1FTWW31P17E****
23	Summary of Complaint CRASHNo
24	FIRENO
25 1	INJURIES0 DEATHS0
25 26	INJURIES0 DEATHS0 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE
26	INJURIES0 DEATHS0
26 27	INJURIES0 DEATHS0 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE EXPERIENCED THIS PROBLEM SINCE TRUCK WAS ALMOST NEW. NOW HAVE 61 K MILES AND IT IS ALOT WORSE. AS THE 08 AND 09 INVESTIGATIONS REVEALED, THE STEERING WOBBLE HAPPENS WHEN CROSSING UNEVEN PAVEMENT, CONCRETE, DIPS IN THE
26	<b>INJURIES0</b> <b>DEATHS0</b> 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE EXPERIENCED THIS PROBLEM SINCE TRUCK WAS ALMOST NEW. NOW HAVE 61 K MILES AND IT IS ALOT WORSE. AS THE 08 AND 09 INVESTIGATIONS REVEALED, THE STEERING
26 27	INJURIES0 DEATHS0 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE EXPERIENCED THIS PROBLEM SINCE TRUCK WAS ALMOST NEW. NOW HAVE 61 K MILES AND IT IS ALOT WORSE. AS THE 08 AND 09 INVESTIGATIONS REVEALED, THE STEERING WOBBLE HAPPENS WHEN CROSSING UNEVEN PAVEMENT, CONCRETE, DIPS IN THE ROAD, RAILROAD CROSSINGS (AT SLOW SPEEDS). HAPPENS WHILE EMPTY AND WHEN TOWING A FLATBED GOOSENECK TRAILER AND/OR MY 5TH WHEEL RV. THIS HAS NOT -166-
26 27	INJURIES0 DEATHS0 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE EXPERIENCED THIS PROBLEM SINCE TRUCK WAS ALMOST NEW. NOW HAVE 61 K MILES AND IT IS ALOT WORSE. AS THE 08 AND 09 INVESTIGATIONS REVEALED, THE STEERING WOBBLE HAPPENS WHEN CROSSING UNEVEN PAVEMENT, CONCRETE, DIPS IN THE ROAD, RAILROAD CROSSINGS (AT SLOW SPEEDS). HAPPENS WHILE EMPTY AND WHEN TOWING A FLATBED GOOSENECK TRAILER AND/OR MY 5TH WHEEL RV. THIS HAS NOT

¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.167 Page 167 of 353
1 2 3 4 5 6 7 8 9 0 1	BEEN RESOLVED BY FORD YET AND THEY DON NOT KNOW HOW TO FIX. I BELIEVE IT IS A BAD STEERING BOX?? THEY ONLY WANT TO USE US/ME AS "GUINEA PIGS" TO FIX. THEY TELL US TO REPLACE SHOCKS, STEERING DAMPERS, AND TIRES. I HAVE PUT TWO SETS OF MICHELINS ON TRUCK AND DOES NOT HELP AT ALL. ACCORDING TO INFO ON INTERNET THIS PROBLEM HAS BEEN GIVEN THE "DEATH WOBBLE" NICKNAME. I WOULD LIKE YOU ALL TO SEE IF FORD HAS TRIED ANYTHING OTHER THAN TELLING US DUMB VEHICLE OWNERS THAT WE DON'T HAVE ENOUGH AIR PRESSURE IN OUR FRONT TIRES. I HAD MY TIRES INSTALLED AND REBALANCED TWO TIMES AT THE LOCAL FORD DEALER AND DOES NOT FIX THE PROBLEM. I FEEL THE TRUCK IS VERY UNSAFE TO DRIVE AT ANY SPEED AND THERE NEEDS TO BE A WAY GET TO THE BOTTOM OF THIS BEFORE SOMEONE OR MORE PEOPLE GET HURT OR KILLED. THE INTERNET IS FULL OF HORROR STORIES AS TO THIS PROBLEM. I FOR ONE AM READY TO CONSULT LEGAL HELP. <u>I JUST SPOKE WITH FORD CUSTOMER SERVICE</u> (COMPLAINT #[XXX]) AND ONCE AGAIN THEY SAID TAKE IT TO ANOTHER DEALER AND MAYBE I'LL HAVE BETTER LUCK.????? PLEASE HELP AND RESPOND.[XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6) 1 Affected Product
2	
3 4 5 6 7 8 9 0 1 2 3 4 5 6 7	January 8, 2016 NHTSA ID NUMBER: 10818907 Components: SERVICE BRAKES, SUSPENSION NHTSA ID Number: 10818907 Incident Date January 1, 2012 Consumer Location WOOD RIVER, IL Vehicle Identification Number 1FTWW31P97E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2007 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 55 MPH OVER A BUMP, THE FRONT END OF THE VEHICLE AND STEERING WHEEL BEGAN TO VIBRATE VIOLENTLY. THE FAILURE OCCURRED WHEN DRIVING 55 MPH OR GREATER OVER AN UNEVEN ROAD SURFACE OR BUMP. THE CONTACT REPAIRED THE VEHICLE HIMSELF. THE FRONT SHOCKS, ROTORS, AND BRAKES WERE REPLACED. IN ADDITION, THE FRONT WHEEL BEARINGS WERE REPLACED WITH FOUR NEW TIRES INSTALLED ON THE VEHICLE. THE FAILURE PERSISTED AFTER THE REPAIRS. <u>THE</u> <u>MANUFACTURER WAS NOTIFIED OF THE FAILURE</u> . THE APPROXIMATE FAILURE MILEAGE WAS 100,000. 1 Affected Product
8	June 30, 2015 NHTSA ID NUMBER: 10731192 Components: SUSPENSION NHTSA ID Number: 10731192
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1	Incident Date June 1, 2015
2	Consumer Location PINEY FLATS, TN Vehicle Identification Number 1FTSW21R98E****
3	Summary of Complaint CRASHNo
4	FIRENo
5	INJURIES0 DEATHS0
6	TL* THE CONTACT OWNS A 2008 FORD F-250. WHILE DRIVING OVER A BUMP AT 60 MPH, THE VEHICLE JERKED AND WOBBLED OUT OF CONTROL. THE FAILURE WAS
7	EXPERIENCED NUMEROUS TIMES. THE VEHICLE WAS TAKEN TO AN INDEPENDENT
8	MECHANIC. THE TECHNICIAN REPLACED THE TRACK BAR, THE FRONT STEERING DAMPER, THE CENTER LINK, AND THE FRONT SUSPENSION; HOWEVER, THE FAILURE
9	WAS NOT CORRECTED. THE MANUFACTURER WAS NOTIFIED. THE FAILURE MILEAGE
10	WAS 159,000. MA 09/03/15 <b>1 Affected Product</b>
11	1 Associated Document
12	
13	November 9, 2018 NHTSA ID NUMBER: 11150428 Components: SUSPENSION
14	NHTSA ID Number: 11150428
15	Incident Date October 26, 2018
	Consumer Location Unknown Vehicle Identification Number 1FTSW21R48E****
16	Summary of Complaint
17	CRASHNo
18	FIRENo INJURIES0
19	DEATHSO
	TL* THE CONTACT OWNS A 2008 FORD F-250. WHILE DRIVING 40 MPH, THE VEHICLE
20	SHOOK. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC, BUT WAS NOT DIAGNOSED OR REPAIRED. THE MECHANIC STATED THAT THE VEHICLE EXHIBITED
21	THE SAME SYMPTOMS AS LISTED IN NHTSA CAMPAIGN NUMBER: 08E026000
22	(EQUIPMENT). THE MANUFACTURER WAS NOTIFIED AND TRANSFERRED THE CONTACT TO NHTSA. THE DEALER WAS NOT CONTACTED. THE FAILURE MILEAGE
23	WAS APPROXIMATELY 186,000.
24	1 Affected Product Request Research (Services fees apply)
25	
26	March 13, 2010 NHTSA ID NUMBER: 10319436
27	Components: SUSPENSION
28	NHTSA ID Number: 10319436 Incident Date March 12, 2010
20	Consumer Location RAYMOND, NH
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0	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.169 Page 169 of 353
1 2	Vehicle Identification Number 1FTWX31508E**** Summary of Complaint CRASHNo
3	FIRENo
4	INJURIES0 DEATHS0
5	2008 F-350 HAS WHAT THEY CALL THE "DEATH WOBBLE" AND HAS A CONSTANT SHAKE
6	AT HIGHWAY SPEEDS. <b>FORD BLAMED IT ON THE TIRES.</b> I REPLACED TIRES WITH ONE OF THE BEST YOU CAN BUY. CONTINUED TO DO THE SAME THING. FORD BLAMED IT
7	ON THOSE TIRES. BEEN IN FOR SERVICE 5 TIMES IN 1 YEAR. DEALERSHIP TOLD ME NOT TO COME BACK BECAUSE THEY CAN'T FIX IT. <b>FORD TELLS ME TO GO BACK TO THE</b>
8	<b>DEALERSHIP.</b> SOMEDAY I'M GOING TO KILL SOMEONE OR MYSELF IN THIS TRUCK SINCE I HAVE NO CONTROL WHEN THE "DEATH WOBBLE" STARTS UNTIL I CAN SLOW
9	DOWN TO ABOUT 20 MPH ON AN INTERSTATE HIGHWAY. UPDATED IVOQ 05/26/10
10	1 Affected Product 2 Associated Documents
11	
12	February 2, 2015 NHTSA ID NUMBER: 10680495
13	Components: SUSPENSION NHTSA ID Number: 10680495
14	Incident Date January 15, 2015
15	Consumer Location BOYDS, MD Vehicle Identification Number 1FTWX31R88E****
16	Summary of Complaint CRASHNo
17	FIRENo
18	INJURIES0 DEATHS0
19	TL* THE CONTACT OWNS A 2008 FORD F-350. WHILE DRIVING 65 MPH OVER A POTHOLE, THE VEHICLE BEGAN TO VIBRATE VIOLENTLY. THE FAILURE RECURRED ON SEVERAL
20	OCCASIONS. THE VEHICLE WAS TAKEN TO A DEALER, WHERE THE TRACK BAR BALL
21	JOINT WAS REPLACED. THE FAILURE PERSISTED. <u>THE MANUFACTURER WAS</u> NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 22,000.
22	UPDATED 03/24/15*LJ UPDATED 9/20/2017*CN 1 Affected Product
23	1 Associated Document
24	
25	August 9, 2016 NHTSA ID NUMBER: 10894286 Components: SUSPENSION
26	NHTSA ID Number: 10894286
27	Incident Date October 10, 2015 Consumer Location DANBURY, CT
28	Vehicle Identification Number 1FTWW31R38E**** Summary of Complaint
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1 2 3 4 5 6 7	CRASHNO FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2008 FORD F-350. THE CONTACT STATED THAT WHILE DRIVING OVER 40 MPH, THE VEHICLE WOBBLED AND VIOLENTLY VIBRATED WITHOUT WARNING. THE VEHICLE WAS TAKEN TO A DEALER ON MULTIPLE OCCASIONS; HOWEVER, THE FAILURE WAS UNABLE TO BE DETERMINED. THE VEHICLE WAS NOT REPAIRED. <u>THE MANUFACTURER WAS NOTIFIED OF THE FAILURE.</u> THE FAILURE MILEAGE WAS 80,000. 1 Affected Product
8	
9	March 9, 2017 NHTSA ID NUMBER: 10959732
10	Components: STEERING, SUSPENSION NHTSA ID Number: 10959732
11	Incident Date December 19, 2016
12	Consumer Location KING, NC Vehicle Identification Number 1FTWW33R98E****
13	Summary of Complaint CRASHNo
14	FIRENO
15	INJURIES0 DEATHS0
	TL* THE CONTACT OWNS A 2008 FORD F-350 SD. THE CONTACT STATED THAT THE
16	VEHICLE EXPERIENCED A RANDOM DEATH WOBBLE ASSOCIATED WITH THE STEERING
17	AND SUSPENSION. A DEALER PERFORMED EXTENSIVE REPAIRS, BUT THE CONDITION CONTINUED. <b>THE DEALER AND THE MANUFACTURER FAILED TO PROVIDE A</b>
18	<b>REMEDY. THE VEHICLE WAS UNABLE TO BE SAFELY DRIVEN DUE TO A STRONG</b>
19	VIBRATION FROM THE STEERING, WHICH ALSO CAUSED THE SUSPENSION TO BE UNSTABLE. THE VEHICLE WAS PARKED AT THE CONTACT'S RESIDENCE. THE FAILURE
20	MILEAGE WAS NOT AVAILABLE.
21	1 Affected Product
22	
23	March 17, 2009 NHTSA ID NUMBER: 10262107 Components: STEERING
24	NHTSA ID Number: 10262107
	Incident Date June 10, 2008 Consumer Location Unknown
25	Vehicle Identification Number 1FDWW35R08E****
26	Summary of Complaint CRASHNo
27	FIRENO
28	INJURIES0
	DEATHS0 -170-
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1 2 3 4 5 6 7	TL*THE CONTACT OWNS A 2008 FORD F-350 SD. THE CONTACT STATED THAT THE FRONT END OF THE VEHICLE WOULD SHIMMY AND SHAKE WHILE DRIVING APPROXIMATELY 50 MPH. ON ONE OCCASION, THE STEERING WHEEL SHOOK SO SEVERELY THAT HE LOST CONTROL OF THE VEHICLE AND VEERED OFF THE ROAD. THERE WERE NO INJURIES. THE CONTACT TOOK THE VEHICLE TO THE DEALER FOR REPAIRS, BUT THE FAILURE PERSISTED. <u>HE FILED A COMPLAINT WITH THE</u> <u>MANUFACTURER, BUT HAS YET TO RECEIVE ANY FEEDBACK.</u> THE CURRENT MILEAGE WAS APPROXIMATELY 42,600 AND FAILURE MILEAGE WAS APPROXIMATELY 15,000. 1 Affected Product
8 9	January 25, 2012 NHTSA ID NUMBER: 10445228 Components: STEERING
10 11	NHTSA ID Number: 10445228 Incident Date April 21, 2010 Consumer Location NAVARRO, CA Vehicle Identification Number 1FTWX31R38E****
12 13	Summary of Complaint CRASHNo FIRENo
14 15	INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2008 FORD F350. THE CONTACT STATED THAT THE VEHICLE WOULD VIBRATE VIOLENTLY WHEN DRIVING BETWEEN 40-55 MPH OR WHEN TURNING
16 17 18	ON ROUGH ROAD SURFACES. THE VEHICLE WAS TAKEN TO THE DEALER NUMEROUS TIMES FOR THE FAILURE. THE DEALER REPLACED THE TRACK LINK AND THE STEERING GEARBOX BUT THE FAILURE WAS NOT CORRECTED AND THE VEHICLE CONTINUED TO VIBRATE EXCESSIVELY. <b>THE MANUFACTURER WAS MADE AWARE</b>
19 20	OF THE FAILURE BUT THE VEHICLE WAS NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 100 AND THE CURRENT MILEAGE WAS 20,000. 1 Affected Product
21 22 23	December 30, 2015 NHTSA ID NUMBER: 10817038 Components: VISIBILITY/WIPER, STEERING, SUSPENSION NHTSA ID Number: 10817038
23 24 25	Incident Date December 11, 2015 Consumer Location SATSUMA, AL Vehicle Identification Number 1FTSW21R79E****
26 27	Summary of Complaint CRASHNo FIRENo INJURIES0
28	DEATHS0
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1 2 3 4 5 6 7 8	DRIVING 2009 FORD F-50 SUPER DUTY FX4 ON INSTERSTATE AT 65 MPH, AS I EXITED TO ANOTHER INTERSTATE I EXPERIENCED A VIOLENT WOBBLE IN THE FRONT END WHICH ONLY STOPPED WHEN I BROUGHT THE PICKUP TRUCK TO A COMPLETE STOP. I TOOK THE TRUCK TO THE DEALER I PURCHASED THE VEHICLE FROM AND THEY GAVE ME A SHOPPING LIST OF \$3300. THIS INCLUDED WINDSHIELD WIPERS. THEY ALSO DID NOT KNOW WHAT CAUSED THIS PROBLEM. <u>FORD CUSTOMER SERVICE SAID THEY DID</u> <u>NOT KNOW OF THIS PROBLEM AND COULD NOT HELP.</u> LOOKING INTO THIS ON GOOGLE, I FOUND HUNDREDS OF SIMILAR PROBLEMS COMMONLY CALLED "DEATH WOBBLE" ON THE INTERNET. THIS VIOLENT SHAKING HAS OCCURRED ONCE MORE TWO WEEKS LATER. I AM PARKING THE VEHICLE UNTIL I DECIDE WHAT I NEED TO DO. I AM AFRAID FOR MY FAMILY'S SAFETY AND OTHER MOTORISTS. *JS <b>1 Affected Product</b>
9 10 11	June 2, 2016 NHTSA ID NUMBER: 10872235 Components: STEERING, SUSPENSION NHTSA ID Number: 10872235 Incident Date March 10, 2016
12 13 14	Consumer Location BIGELOW, AR Vehicle Identification Number 1FTSW21R69E**** Summary of Complaint CRASHNo
15 16	FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2009 FORD F-250 SD. THE CONTACT STATED THAT THE
17 18 19	FRONT END OF THE VEHICLE WAS UNSTABLE SHOOK AND VIBRATED EXCESSIVELY WITH AN EXTREME WOBBLE. THE DEALER WAS NOTIFIED OF THE FAILURE AND WAS UNABLE TO PROVIDE A REPAIR SOLUTION TO PREVENT THE FAILURE. THE CONTACT TOOK THE VEHICLE TO MORE THAN FIVE DIFFERENT REPAIR SHOPS FOR VARIOUS
20 21	REPAIRS, BUT THE FAILURES CONTINUED IN THE FRONT AND REAR ENDS. <u>THE</u> VEHICLE WAS NOT REPAIRED AND THE CONTACT WAS WAITING TO DETERMINE IF THE MANUFACTURER WOULD BE ABLE TO PROVIDE A PERMANENT REPAIR SOLUTION. THE APPROXIMATE FAILURE MILEAGE WAS 180,000. 1 Affected Product
22 23	
24	May 13, 2013 NHTSA ID NUMBER: 10512156 Components: SUSPENSION, STEERING
25	NHTSA ID Number: 10512156 Incident Date November 1, 2012
26 27	Consumer Location CHESAPEAKE, VA Vehicle Identification Number 1FTWW31R49E****
28	Summary of Complaint CRASHNo
	FIREN0 -172-
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1 2 3 4 5 6 7 8 9 10 11 12 13 14	OF 353 <b>INJURIES0</b> <b>DEATHS0</b> I AM THE ORIGINAL OWNER OF A 2009 FORD F350 SRW DIESEL CREW CAB. AT APPROXIMATELY 70,000 MILES I BEGAN TO EXPERIENCE A STRONG FRONT END VIBRATION; DEATH WOBBLE. WHEN I GO OVER UNEVEN ROADS AT SPEEDS ABOVE 55 MPH. THE VIBRATION IS SO GREAT THAT THE STEERING WHEEL REQUIRES A TIGHT HOLD TO KEEP CONTROL OF THE TRUCK. THE VIBRATION CONTINUES UNTIL I SLOW DOWN TO AROUND 40 MPH. THIS BECOMES EVEN SCARIER WHEN I AM ON A FREEWAY FLY OVER THAT TURNS AND I HIT AN EXPANSION JOINT. THE TRUCK SHAKES AND TRIES TO PUSH AWAY FROM THE TURN. I TOOK MY TRUCK TO THE DEALER ON FOUR OCCASIONS. THE FIRST VISIT THEY SAID THEY COULD NOT DUPLICATE THE PROBLEM AND THAT I NEEDED NEW TIRES. I BOUGHT NEW TIRES AND IT DID NOT CORRECT THE PROBLEM. I TOOK IT BACK THE SECOND TIME AND THEY CHANGED OUT THE BALL JOINTS, TIE RODS, STEERING DAMPER, DID A FRONT END ALIGNMENT AND BALANCED MY WHEELS. IT SEEMED TO WORK FOR A SHORT TIME UNTIL A PART FELL OFF THE FRONT END OF MY TRUCK AND HIT ANOTHER ONE BEHIND ME IN THE CAR POOL LANE. I TOOK IT BACK TO THE DEALER TO FIND OUT WHAT I LOST. I WAS TOLD A PART FELL OFF BUT THEY DID NOT WORK NEAR IT. FUNNY THING, IT BEGAN TO VIBRATE AGAIN AFTER THAT. I RECENTLY TOOK IT BACK AND TALKED TO THE TECHNICIAN BEFORE I LEFT THE TRUCK SO HE WOULD UNDERSTAND WHAT IT WAS DOING. HE TOOK IT FOR A DRIVE BUT DID NOT GET IT TO VIBRATE AS I REPORTED TO HIM. HE TOLD ME THAT MY TRUCK DRIVES JUST LIKE ALL F350'S WITHOUT A LOAD. I HAVE PUT MY SLIDE IN CAMPER IN THE BED OF MY TRUCK, 3,500 LBS. AND IT STILL VIBRATES VIOLENTLY. I	
15 16	THINK THAT WOULD BE CONSIDERED A LOAD AND IT TRULY FEELS LIKE A DEATH WOBBLE AS DESCRIBED BY MANY INTERNET POSTINGS. <u>THE FORD REP I SPOKE TO</u>	
16 17	SAID THEY ARE NOT AWARE OF ANY PROBLEMS. I AM IN THE PROCESS OF FILING A FORMAL COMPLAINT WITH FORD. 1 Affected Product	
18		ļ
19	March 10, 2016 NHTSA ID NUMBER: 10845889	
20 21	Components: SUSPENSION NHTSA ID Number: 10845889	
21	Incident Date February 2, 2015 Consumer Location SILVER CITY, NM	
23	Vehicle Identification Number 1FTSW2BR0AE**** Summary of Complaint	
24	CRASHNo FIRENo	
25	INJURIES0 DEATHS0	
26	TL* THE CONTACT OWNS A 2010 FORD F-250 SD. THE CONTACT STATED THAT WHILE	
27	DRIVING AT ANY SPEED OVER 20 MPH, THE VEHICLE WOULD EXPERIENCE SEVERE FRONT END VIBRATING AND SHAKING. THE VEHICLE WAS TAKEN TO THE DEALER BUT THE CAUSE OF THE FAIL LIPE WAS NOT DETERMINED. THE MANUEACTURED WAS	
28	THE CAUSE OF THE FAILURE WAS NOT DETERMINED. <u>THE MANUFACTURER WAS</u> NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 30,000.	
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1 Af	ffected Product
Ianu	ary 25, 2012 NHTSA ID NUMBER: 10445217
	nponents: SUSPENSION, STEERING
	<b>FSA ID Number:</b> 10445217
Inci	dent Date January 20, 2012
	sumer Location ROCHESTER HILLS, MI
	icle Identification Number 1FT7W2B60BE****
	imary of Complaint
-	ASHNO
	ENo URIES0
	ATHSO
	AS DRIVING ON A ENTRANCE RAMP TO AN INTERSTATE AT ABOUT 55-60MPH I
	CALL HITTING SOME TYPE OF ROAD BUMPS - PAVEMENT JOINT THAT STARTED T
EVE	ENT TYPICALLY I'M USED TO EXPERIENCING THE BACK OF MY TRUCK BOUNCE
	E PAST CAUSING LANE CORRECTION BUT THIS TIME THE WHOLE FRONT END
	RTED SHAKING SEVERELY I WAS IN THE LEFT LANE OF 3 SO DECIDED TO BREA
	O GET INTO THE CENTER MEDIAN ASAP BASED ON APPROACHING VEHICLES FRO
	HIND I PULLED OFF AND CHECKED THE LEFT SIDE AND THE RIGHT ALL WAS
	E I SHOOK THE WHEELS ALL TIGHT THE SHAKING OF THE VEHICLE WAS SO YERE I HAD A HARD TIME CONTROLLING IT AND GETTING IT SAFELY OFF THE
	ADWAY PAPERS IN MY VISORS SHOOK LOOSE 2 GYM BAGS IN PASSENGER SEA
	DED UP ON FLOOR A LARGE SCREEN TV THAT WAS TAPED AGAINST THE BACK
	NOW ON THE BACK SEAT WAS THUS SHIFTED LAYING NOW ON TOP OF THE FRO
SEA	TS I LATER REALIZED THAT THE SANDWICH I JUST BOUGHT WAS GONE FROM
	E CONSOLE AND LATER FOUND ON THE FLOOR AT THE PASSENGERS DOOR!!!! BE
	MMITTED TO THE FREEWAY I SLOWLY STARTED OUT, AND NO OTHER ISSUES
	TER ABOUT 20 MINUTES ON THE FREEWAY I KICKED IT UP TO FREEWAY SPEEDS,
	Γ GOT THE PUCKER FACTOR EACH TIME I HIT ROAD BUMPS ON MY TRIP I WORK R THE CITY OF ROCHESTER HILLS AND CALLED OUR FLEET MGR, AND TOLD HIM
	ISSUE, HE HAD NO IDEA BUT CHECKED AND FOUND TSB 11-6-14 THAT WAS
	REATIM WHAT HAPPENED TO ME THE DEALER ORDERED UP PARTS AND WILL
<u>AD</u>	VISE WHEN TO BRING IT IN BUT FORD CORP I FELT SHOULD HAVE NOTIFIED
	OSSIBLE ROLL OVER ISSUE, AS IM SURE IF I WAS AT 70-80 ON THE FREEWAY OR
	KIDS DRIVING WITH LESS EXPERIENCE THERE WOULD HAVE BEEN A ROLLOVER
	RD SAID UNTIL IT HAPPENS AGAIN OR THE DEALER CAN NOT FIX IT THERE W
	<u><b>FHING MORE THEY COULD DO!!!!!</b></u> I ADVISED IT LOOKS LIKE THE NEXT CALL TI NT IS FROM LEGAL COUNCIL ADDING THE 0000 AFTER A FATALITY!!! *TR
	fected Product
D	
	ember 5, 2012 NHTSA ID NUMBER: 10487446
	nponents: SUSPENSION FSA ID Number: 10487446
TATT.	-174-
Clas	-1/4-
	e No.

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1	Incident Date February 1, 2012 Consumer Location MOUNTVILLE, PA
2	Vehicle Identification Number 1FT7X2B64BE****
3	Summary of Complaint CRASHNo
4	FIRENo
5	INJURIES0 DEATHS0
6	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING
7	APPROXIMATELY 50 MPH OVER A ROAD BUMP WHEN THE FRONT END OF THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER
8	THREE TIMES FOR THE FAILURE. THE STEERING STABILIZER AND FRONT END SHOCKS
9	WERE REPLACED AT DIFFERENT TIMES. THE FAILURE RECURRED AFTER THE REPAIRS WERE PERFORMED WHENEVER DRIVING OVER A ROAD BUMP OR POTHOLE. <u>THE</u>
-	MANUFACTURER WAS NOTIFIED OF THE PROBLEM. THE APPROXIMATE FAILURE
10 11	MILEAGE WAS 28,848. 1 Affected Product
11 12	
	March 27, 2014 NHTSA ID NUMBER: 10575179
13	Components: STEERING, WHEELS, SUSPENSION
14	NHTSA ID Number: 10575179 Incident Date February 10, 2014
15	Consumer Location NORTON, VA
16	Vehicle Identification Number 1FT7X2B61BE**** Summary of Complaint
17	CRASHNo
	FIRENo
18	INJURIES0
19	DEATHS0 TRUCK DEVELOPED A VIOLENT SHAKE IN THE FRONT END AND BECAME
20	UNCONTROLLABLE. HAVE TO STOP IMMEDIATELY BEFORE VEHICLE WILL STOP
	SHAKING. THE ISSUE IS REFERRED TO THE "FORD DEATH WOBBLE" WITH MANY
21	RECORDED INSTANCES OF THIS ON THE WEB AND YOUTUBE. ISSUE HAS GOTTEN
22	WORSE AND IS UNSAFE TO DRIVE. HAS BEEN IN THE FORD DEALER AND MANY NEW PARTS REPLACED BUT PROBLEM PERSIST. FORD DEALER CANNOT SEEM TO CORRECT
23	SO IT HAS BEEN IN TWO OTHER GARAGES FOR SECOND OPINIONS. CONTACTED FORD
24	MOTOR COMPANY AND THEY HAVE NO RECALLS OR ANY KNOWLEDGE OF THIS PROBLEM. VEHICLE IS A DANGER TO THE HIGHWAY. *TR
25	1 Affected Product
26	
20	December 6, 2016 NHTSA ID NUMBER: 10930180
	Components: SUSPENSION, STEERING NHTSA ID Number: 10930180
28	Incident Date October 15, 2016
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1	Consumer Location WILLIS, TX Vehicle Identification Number 1FT7W2BT0BE****
2	Summary of Complaint
3	CRASHNo
4	FIRENo INJURIES0
5	DEATHS0
6	TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 70 MPH, THE CONTACT LOST CONTROL OF THE VEHICLE. IT TOOK SEVERAL SECONDS FOR THE CONTACT TO
7	REGAIN CONTROL. THE FAILURE RECURRED SEVERAL TIMES. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO DIAGNOSED THAT THE SUSPENSION
8	SYSTEM FAILED. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED
9	<b>OF THE FAILURE.</b> THE FAILURE MILEAGE WAS APPROXIMATELY 100,000. <b>1 Affected Product</b>
10	
11	June 27, 2017 NHTSA ID NUMBER: 11001691
12	Components: SUSPENSION, STEERING NHTSA ID Number: 11001691
	Incident Date June 15, 2013
13	Consumer Location VICTORIA, TX
14	Vehicle Identification Number 1FT7W2BT4BE**** Summary of Complaint
15	CRASHNo
16	FIRENO
17	INJURIES0 DEATHS0
-	TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH, THE VEHICLE
18	WOBBLED AND SHOOK VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER (MAC HAIK FORD LINCOLN HYUNDAI 4506 N NAVARRO ST, VICTORIA, TX 77904), BUT THE
19	DEALER WAS UNABLE TO DUPLICATE THE FAILURE. THE DEALER REPLACED
20	UNKNOWN PARTS ON THE FRONT END OF THE VEHICLE, BUT THE FAILURE RECURRED
21	SEVERAL MORE TIMES. <u>THE MANUFACTURER STATED THAT THE CONTACT SHOULD</u> TAKE THE VEHICLE TO A DEALER AND HAVE IT DIAGNOSED. THE CONTACT WAS
22	<b>REFERRED TO NHTSA.</b> THE APPROXIMATE FAILURE MILEAGE WAS 25,000. <b>1 Affected Product</b>
23	
24	July 5, 2017 NHTSA ID NUMBER: 11003164
25	Components: SUSPENSION, WHEELS
26	NHTSA ID Number: 11003164 Incident Date April 3, 2017
27	Consumer Location BAKERSFIELD, CA
28	Vehicle Identification Number 1FT7W2BT6BE**** Summary of Complaint
28	CRASHNo
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1 2 3 4 5 6 7 8 9	FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH OVER A BUMP IN THE ROADWAY, THE VEHICLE SHOOK VIOLENTLY UNTIL SLOWING TO 30 MPH OR COMING TO A FULL STOP. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THE LOCAL DEALER (JIM BURKE FORD 2001 OAK ST, BAKERSFIELD, CA 93301 (661) 328-3600), BUT THE FAILURE COULD NOT BE DUPLICATED OR DIAGNOSED. THE CONTACT WAS ADVISED TO REPLACE ALL FOUR TIRES. ALL FOUR TIRES WERE REPLACED, BUT THE ISSUE PERSISTED. <u>THE MANUFACTURER WAS NOTIFIED AND REFERRED THE CONTACT TO</u> NHTSA. THE FAILURE MILEAGE WAS 225,000. 1 Affected Product
10 11 12	November 8, 2018 NHTSA ID NUMBER: 11150119 Components: SUSPENSION, STEERING NHTSA ID Number: 11150119 Incident Date October 31, 2018 Consumer L contion DAYTON, OU
13 14 15	Consumer Location DAYTON, OH Vehicle Identification Number 1FT7X2B66BE**** Summary of Complaint CRASHNo FIRENo
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2011 FORD F-250 SD. WHILE DRIVING OVER UNEVEN LAND AND BUMPS IN THE ROAD, THE VEHICLE SHOOK VIOLENTLY. ALSO, THE STEERING WHEEL VIBRATED AND THERE WAS A STRONG VIBRATION FELT IN THE FRONT OF THE VEHICLE WHILE DRIVING HIGHWAY SPEEDS. GERMAIN FORD OF BEAVERCREEK (2356 HELLER DR, DAYTON, OH 45434, 1-(937) 429-1300) WAS NOTIFIED OF THE FAILURE AND COULD NOT DETERMINE THE CAUSE OF THE FAILURE WITHOUT GUIDELINES FROM THE MANUFACTURER. THE VEHICLE WAS NOT REPAIRED. <u>THE MANUFACTURER WAS</u> NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 58,000. 1 Affected Product
<ul> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ul>	September 20, 2013 NHTSA ID NUMBER: 10544696 Components: STEERING NHTSA ID Number: 10544696 Incident Date September 20, 2013 Consumer Location GATE CITY, VA Vehicle Identification Number 1FT7X2BT3BE**** Summary of Complaint CRASHNo FIRENo -177-
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1 2 3 4 5 6 7 8 9 0	INJURIES0 DEATHS0 APP. ONE YEAR AGO, I STARTED HAVING TROUBLE WITH MY TRUCK. IT WOULD SHAKE IF I HIT A ROUGH SPOT OR BRIDGE APPROACH AT 60 TO 70 MILES AN HOUR, CAUSING THE STEERING WHEEL AND THE WHOLE TRUCK TO SHAKE. I'VE HAD IT TO THE DEALER A NUMBER OF TIMES AND HAVE SPENT ABOUT \$2100.00 AND IT'S STILL DOING IT. AT TIMES IT SHAKES REALLY HARD AND TO GET IT TO QUIT I HAVE TO BRING MY SPEED DOWN TO 30 MILES AN HOUR. THAT IS VERY DANGEROUS ON THE INTERSTATE WITH ALL THE TRAFFIC. FORD SAYS IT DOES THAT SOMETIMES, I'VE HAD 6 F250'S FROM 1999 TO PRESENT AND NONE OF THEM HAVE EVER DONE THIS, EXCEPT THIS TRUCK. HAVE YOU EVER HAD ANY MORE COMPLAINTS OF THIS NATURE? PLEASE CONTACT ME ON WHAT TO DO. <u>THE DEALER HAS CONTACTED FORD MOTOR COM. THEY ARE THE</u> <u>ONES THAT SAYS IT SUPPOSE TO DO IT SOMETIMES.</u> IT DONE THAT 6 TIMES IN A 10 HOUR DRIVE 2 WEEKS AGO. *TR 1 Affected Product
1 2 3 4 5 6 7 8 9 0 1 2 3	November 18, 2013 NHTSA ID NUMBER: 10552684 Components: STEERING NHTSA ID Number: 10552684 Incident Date October 9, 2013 Consumer Location VALLEY STREAM, NY Vehicle Identification Number 1FT7W2B60BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE DRIVING 60 MPH OVER A ROAD BUMP, THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE CONTACT STATED THAT HE APPLIED THE BRAKES AND THE SHAKING CEASED. THE VEHICLE WAS TAKEN TO THE DEALER FOR INSPECTION BUT THEY COULD NOT DIAGNOSE THE CAUSE OF THE FAILURE. THE VEHICLE WAS NOT REPAIRED. <u>THE</u> <u>MANUFACTURER WAS NOTIFIED OF THE FAILURE.</u> THE FAILURE MILEAGE WAS 35,000. 1 Affected Product
4 5 6 7 8	September 16, 2011 NHTSA ID NUMBER: 10425765 Components: SUSPENSION NHTSA ID Number: 10425765 Incident Date September 14, 2011 Consumer Location KENTFIELD, CA Vehicle Identification Number 1FT7W3BT4BE**** Summary of Complaint CRASHNo -178-
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1 2 3 4 5	FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2011 FORD F-350. THE CONTACT WAS DRIVING APPROXIMATELY 65 MPH OVER A ROAD BUMP WHEN THE VEHICLE BEGAN TO VIBRATE VIOLENTLY, CAUSING THE VEHICLE TO TRAVEL INTO ANOTHER LANE WITHOUT INTENT. THE FAILURE RECURRED THREE TIMES WHILE DRIVING OVER A
6 7	ROAD BUMP OR POTHOLE. THE CONTACT PLANNED TO TAKE THE VEHICLE TO AN AUTHORIZED DEALER FOR DIAGNOSIS. <u>THE MANUFACTURER WAS MADE AWARE OF</u> <u>THE PROBLEM.</u> THE APPROXIMATE FAILURE MILEAGE WAS 23,400. <u>1 Affected Product</u>
8 9 10	November 2, 2011 NHTSA ID NUMBER: 10433960 Components: SUSPENSION NHTSA ID Number: 10433960
10 11 12	Incident Date September 14, 2011 Consumer Location MCLEANSVILLE, NC Vehicle Identification Number 1FT8W3DT4BE**** Summary of Complaint
13 14 15	CRASHNO FIRENO INJURIESO DEATHSO TI * THE CONTACT OWNS A 2011 FORD F 250. THE CONTACT STATED THAT WILL F
13 16 17 18 19	TL* THE CONTACT OWNS A 2011 FORD F-350. THE CONTACT STATED THAT WHILE DRIVING 40 MPH, THE FRONT END OF THE VEHICLE STARTED TO JERK VIOLENTLY. THE VEHICLE WAS NOT TAKEN TO THE DEALER. <u>THE MANUFACTURER WAS MADE</u> <u>AWARE OF THE FAILURE WHO REFERRED HIM TO THE DEALER.</u> THE VEHICLE WAS NOT REPAIRED. THE FAILURE AND CURRENT MILEAGE WAS 23,500. 1 Affected Product
20	August 17, 2012 NHTSA ID NUMBER: 10471247
21	Components: STEERING NHTSA ID Number: 10471247 Incident Date July 17, 2011
22 23	Consumer Location THOUSAND OAKS, CA Vehicle Identification Number 1FDRF3GT6BE****
24	Summary of Complaint CRASHNo
25	FIRENo INJURIES0
26 27	<b>DEATHSO</b> TL* THE CONTACT OWNS A 2011 FORD F350 SD. THE CONTACT STATED THAT HE NOTICED BOTH FRONT TIRES EXHIBITED AN IRREGULAR WEAR PATTERN IN THE EXACT SAME PLACE. THE VEHICLE WAS TAKEN TO THE DEALER WHO ALIGNED THE
28	TIRES BUT THE FAILURE PERSISTED. <u>THE MANUFACTURER WAS NOTIFIED AND A</u>
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1 2 3	CLAIM WAS FILED (CLAIM NUMBER 1512842141) BUT IT WAS DENIED BY THE MANUFACTURER WHO OFFERED NO ASSISTANCE. THE FAILURE MILEAGE WAS 2,000 AND THE CURRENT MILEAGE WAS 20,000. 1 Affected Product
4	
5	February 28, 2013 NHTSA ID NUMBER: 10500801 Components: STEERING
6	NHTSA ID Number: 10500801
7	Incident Date January 2, 2013
	Consumer Location POCOMOKE CITY, MD Vehicle Identification Number 1FT8W3BTXBE****
8	Summary of Complaint
9	CRASHNo
10	FIRENo INJURIES0
11	DEATHSO
	TL* THE CONTACT OWNS A 2011 FORD F-350 SUPER DUTY. THE CONTACT STATED THAT
12	WHILE DRIVING 59 MPH, THE VEHICLE BEGAN TO SHAKE AND WOBBLE VIOLENTLY, CAUSING THE CONTACT DIFFICULTY IN CONTROLLING THE VEHICLE. THE VEHICLE
13	WAS TAKEN TO A DEALER FOR DIAGNOSIS WHERE THE U-BOLTS WERE REPLACED BUT
14	THE FAILURE RECURRED. THE VEHICLE WAS THEN TAKEN TO AN INDEPENDENT
	MECHANIC WHERE THE STEERING SHOCK ABSORBER WAS REPLACED HOWEVER, THE
15	FAILURE RECURRED. THE TORQUE BAR AND THE TWO FRONT SHOCKS WERE REPLACED ON SUBSEQUENT VISITS. LATER, THE TIRES WERE ROTATED BUT TO NO
16	AVAIL. THE MECHANIC THEN DEFLATED THE TIRES. THE FAILURE RECURRED. THE
17	TIRES WERE THEN OVER INFLATED AND THE FAILURE RECURRED. <u>THE</u>
18	MANUFACTURER WAS NOTIFIED AND STATED THAT THE WOBBLE WAS NORMAL
	AND OFFERED NO OTHER ASSISTANCE. THE VEHICLE WAS NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT MILEAGE WAS 315,000.
19	1 Affected Product
20	
21	March 27, 2013 NHTSA ID NUMBER: 10504688
22	Components: STEERING
	NHTSA ID Number: 10504688
23	Incident Date January 23, 2013
24	Consumer Location MOORESVILLE, NC Vehicle Identification Number 1FT8W3BT4BE****
25	Summary of Complaint
	CRASHNo
26	FIRENO
27	INJURIES0 DEATHS0
28	TL* THE CONTACT OWNS A 2011 FORD F-350. THE CONTACT STATED THAT WHILE
	DRIVING APPROXIMATELY 65 MPH, THE VEHICLE WOULD SHAKE VIOLENTLY AND
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1 2 3 4 5	WITHOUT WARNING. THE VEHICLE WAS TAKEN TO THE DEALER WHERE IT WAS DIAGNOSED THAT THE STEERING STABILIZER NEEDED TO BE REPLACED. THE CONTACT MENTIONED THE VEHICLE WAS TAKEN TO THE DEALER TWICE FOR THE SAME FAILURE. <u>THE MANUFACTURER WAS MADE AWARE OF THE FAILURE.</u> THE VEHICLE WAS NOT REPAIRED. THE APPROXIMATE FAILURE MILEAGE WAS 12,000 AND THE CURRENT MILEAGE WAS 30,000. *TR 1 Affected Product
5 6 7 8 9 10	September 24, 2015 NHTSA ID NUMBER: 10776467 Components: SUSPENSION NHTSA ID Number: 10776467 Incident Date April 15, 2014 Consumer Location PALM BAY, FL Vehicle Identification Number 1FT7W2BT6CE**** Summary of Complaint CRASHNo
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> </ol>	FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2012 FORD F-250. WHILE DRIVING APPROXIMATELY 60 MPH, THERE WAS A BUMP IN THE ROAD THAT CAUSED THE VEHICLE TO WOBBLE. THE FAILURE RECURRED MULTIPLE TIMES. THE VEHICLE WAS TAKEN TO A DEALER FOR DIAGNOSTIC TESTING. THE MECHANIC STATED THAT THE STEERING BOX, STABILIZER, AND DRAG LINK NEEDED TO BE REPLACED. <u>THE MANUFACTURER WAS NOTIFIED OF</u> <u>THE FAILURE.</u> THE APPROXIMATE FAILURE MILEAGE WAS 45,000. 1 Affected Product
18         19         20         21         22         23         24         25         26         27         28	November 18, 2015 NHTSA ID NUMBER: 10794621 Components: SUSPENSION, STEERING NHTSA ID Number: 10794621 Incident Date October 25, 2015 Consumer Location MERIDIAN, ID Vehicle Identification Number 1FT7W2BT1CE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 DRIVING AT HIGHWAY SPEEDS OF 55 - 65MPH AND HIT A SLIGHT BUMP IN THE ROAD THE ENTIRE FRONT END OF THE VEHICLE SHAKES UNCONTROLLABLY. IN ORDER TO GET THIS TO STOP YOU MUST SLAM ON THE BRAKES TO BRING THE SPEED DOWN TO 15 - 20 MPH. FORD DEALERSHIP SERVICE ADVISER AND MECHANIC ACKNOWLEDGE THIS ISSUE EXISTS AND HAS SINCE 2005 BUT THERE ISN'T ANY RESOLUTION FOR THE ISSUE. MY VEHICLE HAS BEEN IN THE SHOP 3 DIFFERENT TIMES FOR OVER A MONTH IN TOTAL TIME. FORD REGION CUSTOMER SERVICE MANAGER STATES THE ISSUE IS -181-
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0	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.182 Page 182 of 353
1 2 3	THE ROAD. I FIND IT ODD THERE ARE MAY OTHER FORD TRUCK OWNERS WITH THE SAME ISSUE. 1 Affected Product
4	
5	July 11, 2018 NHTSA ID NUMBER: 11110864 Components: SUSPENSION
6	NHTSA ID Number: 11110864 Incident Date July 9, 2018
7	Consumer Location COLUMBIA CITY, IN
8	Vehicle Identification Number 1FT7W2BT3CE**** Summary of Complaint
9	CRASHNo FIRENo
10	INJURIES0 DEATHS0
11	THE VEHICLE WILL RANDOMLY SHAKE VIOLENTLY CAUSING LOSS OF CONTROL OF
12	THE TRUCK WHILE DRIVING. AFTER DOING RESEARCH I FOUND PEOPLE WHO HAVE REFERRED TO THIS AS THE "DEATH WOBBLE." I HAVE HAD REPAIRS TO MY TRUCK 3
13	TIMES IN THE LAST 2 YEARS TO FIX THIS CAUSING ME APPROXIMATELY \$1000 EACH TIME. MOST RECENTLY MONDAY JULY 9, 2018. THE "REPAIR" SEEMS TO BE ONLY
14	TEMPORARY AND EACH TIME I HAVE IT FIXED IT LASTS 6-9 MONTHS. <u>THE</u>
15	DEALERSHIP IS UNWILLING TO HELP NOR IS FORD CUSTOMER COMPLAINT DEPARTMENT. THIS HAPPENS WHILE DRIVING 55-65 MPH AND AFTER HITTING A BUMP.
16	1 Affected Product
17	
18	July 30, 2013 NHTSA ID NUMBER: 10532703 Components: SUSPENSION
19	NHTSA ID Number: 10532703
20	Incident Date April 4, 2013 Consumer Location JONESTOWN, PA
	Vehicle Identification Number 1FT7W2BT7CE****
21	Summary of Complaint
22	CRASHNo FIRENo
23	INJURIES0
24	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2012 FORD F-250SD. THE CONTACT STATED THAT WHILE
25	DRIVING VARIOUS SPEEDS OVER A ROAD BUMP OR POTHOLE, THE VEHICLE WOULD
26	TRAVEL OUT OF LANE WITHOUT WARNING. THE VEHICLE WAS INSPECTED BY TWO DIFFERENT DEALERS WHO WERE UNABLE TO LOCATE A PROBLEM WITH THE SHOCKS.
27	THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC FOR A THIRD OPINION AND
28	THEY REPLACED FOUR SHOCKS. THE AUTHORIZED DEALER REIMBURSED THE OWNER FOR THE DEFECTIVE SHOCKS. THE MANUFACTURER WAS NOTIFIED OF THE DEFECT.
	THE APPROXIMATE FAILURE MILEAGE WAS 3,000.
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1	1 Affected Product
3	November 21, 2018 NHTSA ID NUMBER: 11153140
4	Components: SUSPENSION, STEERING, WHEELS NHTSA ID Number: 11153140
5	Incident Date November 19, 2018 Consumer Location Unknown
6	Vehicle Identification Number 1FT7W2BT9CE****
7	Summary of Complaint CRASHNo
8	FIRENo INJURIES0
9	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2012 FORD F-250 SD. WHILE DRIVING APPROXIMATELY 45
10	MPH, THE VEHICLE STARTED TO WOBBLE VIOLENTLY. THERE WERE NO WARNING
11	INDICATORS ILLUMINATED. THE CONTACT MENTIONED THAT THE ONLY WAY TO STOP THE WOBBLE WAS TO REDUCE THE SPEED. THE CONTACT ALSO STATED THAT THE
12	FAILURE OCCURRED ONE OTHER TIME. THE VEHICLE WAS TAKEN TO KENLY FORD INC (500 S GARNER AVE, KENLY, NC 27542) WHERE THE STEERING ARM AND TORSION BAR
13	WERE REPLACED, AND AN ALIGNMENT WAS PERFORMED. <u>THE MANUFACTURER WAS</u> NOTIFIED OF THE FAILURE. THE VEHICLE WAS REPAIRED. THE APPROXIMATE
14	FAILURE MILEAGE WAS 80,000.
15 16	1 Affected Product
10	July 29, 2016 NHTSA ID NUMBER: 10891584
18	Components: ELECTRONIC STABILITY CONTROL, STEERING
19	NHTSA ID Number: 10891584 Incident Date September 1, 2014
20	Consumer Location Unknown Vehicle Identification Number 1FT8W3BT4CE****
21	Summary of Complaint CRASHNo
22	FIRENo INJURIES0
23	DEATHS0
24	TL* THE CONTACT OWNS A 2012 FORD F-350. WHILE DRIVING APPROXIMATELY 75 MPH, THE FRONT END OF THE VEHICLE AND STEERING WHEEL BEGAN TO VIOLENTLY
25	VIBRATE. THE CONTACT HAD TO APPLY THE BRAKES TO FORCE THE VEHICLE TO DECREASE IN SPEED. THE VEHICLE WAS EVENTUALLY TURNED OFF TO STOP THE
26	VIBRATION. THE CONTACT TOOK THE VEHICLE TO THE DEALER WHO INFORMED THE CONTACT THAT THIS WAS COMMON AMONG FORD VEHICLES AND WAS KNOWN AS
27	THE "DEATH WOBBLE." THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. <u>THE</u>
28	MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE RECURRED. THE APPROXIMATE FAILURE MILEAGE WAS 141,000.
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1	1 Affected Product
$\frac{2}{3}$	April 18, 2018 NHTSA ID NUMBER: 11088792
_	Components: SUSPENSION, WHEELS
4	NHTSA ID Number: 11088792 Incident Date April 18, 2018
5	Consumer Location GREENVIEW, IL
6	Vehicle Identification Number 1FT7W2BT7DE****
7	Summary of Complaint CRASHNo
8	FIRENo
9	INJURIES0
-	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2013 FORD F-250. WHILE DRIVING ABOVE 40 MPH OVER A
10	BUMP IN THE ROAD, THE VEHICLE SHOOK AND THE FRONT OF THE VEHICLE BECAME
11	DIFFICULT TO CONTROL. THERE WERE NO WARNING INDICATORS ILLUMINATED BEFORE OR AFTER THE FAILURE. THE VEHICLE WAS TAKEN TO LANDMARK FORD (2401
12	PRAIRIE CROSSING DR., SPRINGFIELD, IL 62711) FOR DIAGNOSTIC TESTING AND
13	REPAIRS. THE CONTACT WAS UNABLE TO RECALL WHAT WAS DIAGNOSED AND
14	REPAIRED. THE CONTACT STATED THAT THE VEHICLE WAS REPAIRED, BUT THE FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE
	APPROXIMATE FAILURE MILEAGE WAS 60,000.
15	1 Affected Product
16	
17	July 24, 2017 NHTSA ID NUMBER: 11010308
18	Components: SUSPENSION NHTSA ID Number: 11010308
19	Incident Date February 15, 2015
	Consumer Location COLORADO SPRINGS, CO
20	Vehicle Identification Number 1FT8W3BT0DE**** Summary of Complaint
21	CRASHNo
22	FIRENo INJURIESO
23	DEATHS0
24	TL* THE CONTACT OWNS A 2013 FORD F-350. ON SEVERAL OCCASIONS, WHILE DRIVING
25	55 MPH, THE VEHICLE VIOLENTLY SHOOK WHEN MAKING CONTACT WITH A BUMP. THE CONTACT STATED THAT THE STEERING WHEEL BECAME DIFFICULT TO MANEUVER
	WHEN THE SHAKING OCCURRED AND THE CHECK ENGINE WARNING INDICATOR
26	ILLUMINATED. THE VEHICLE WAS TAKEN TO PHIL LONG FORD OF MOTOR CITY (1212 MOTOR CITY DR, COLORADO SPRINGS, CO 80905 (719) 694-3487) WHERE THE FAILURE
27	WAS DIAGNOSED AS THE (DEATH WOBBLE). THE BALL JOINTS, TRACKING BAR
28	BUSHINGS, SPRING MOUTH, STEERING STABILIZER SHOCK, AND ALL FOUR TIRES
	NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE
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1 2 3	RECURRED. <u>THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO</u> <u>TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS</u> <u>OFFERED.</u> THE FAILURE MILEAGE WAS 53,000. <u>1 Affected Product</u>
4	February 3, 2016 NHTSA ID NUMBER: 10823993
5	Components: ENGINE, STEERING
6	NHTSA ID Number: 10823993 Incident Date July 1, 2015
7	Consumer Location FARMINGTON, NM
8	Vehicle Identification Number N/A
9	Summary of Complaint CRASHNo
10	FIRENo
	INJURIES0 DEATHS0
11	TL* THE CONTACT OWNS A 2015 FORD F-250. WHILE DRIVING AT VARIOUS SPEEDS, THE
12	VEHICLE SUDDENLY BECAME TURBULENT, SHOOK, AND A KNOCKING NOISE WAS HEARD FROM THE ENGINE. THE CONTACT WOULD HAVE TO PARK AND TURN OFF THE
13	VEHICLE IN ORDER TO STOP THE FAILURE FROM OCCURRING. THE CONTACT TOOK
14	THE VEHICLE TO THE DEALER FIVE TIMES. THE DEALER STATED THAT THIS WAS A COMMON FAILURE WITH THE VEHICLE AND THERE WAS NO REMEDY. THE VEHICLE
15	WAS NOT REPAIRED. THE FAILURE RECURRED. THE MANUFACTURER STATED THAT
16	THE FAILURE DID NOT QUALIFY UNDER THE LEMON LAW. THE VIN WAS UNKNOWN.
17	THE APPROXIMATE FAILURE MILEAGE WAS 19,000. <b>1 Affected Product</b>
18	
19	October 20, 2014 NHTSA ID NUMBER: 10648730
	Components: ELECTRONIC STABILITY CONTROL, UNKNOWN OR OTHER,
20	SUSPENSION NHTSA ID Number: 10648730
21	Incident Date October 15, 2014
22	Consumer Location SANBORNTON, NH Vehicle Identification Number 1FT7X3B66FE****
23	Summary of Complaint
24	CRASHNo FIRENo
25	INJURIES0
26	<b>DEATHS0</b> TRAVELING ON A PAVED ROAD. SPEED LIMIT 45 MPH. IT WAS RAINING. NO PUDDLING
27	WAS ENCOUNTERED. I ENTERED A SLIGHT LEFT TURN AND ENCOUNTERED A
	WASHBOARD TYPE BUMP. IMMEDIATELY, THE FRONT OF THE VEHICLE VIBRATED
28	EXCESSIVELY. I RELEASED THE GAS PEDAL AND PUSHED SLIGHTLY ON THE BRAKES. THE REAR OF THE VEHICLE STARTED TO VIBRATE AND THE REAR AXLE LOST
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	TRACTION ALLOWING THE REAR OF THE VEHICLE TO SWING VIOLENTLY TO THE RIGHT. I IMMEDIATELY WENT TO THE FORD DEALERSHIP WHERE I PURCHASED THE VEHICLE LESS THAN 10 DAYS AGO. SERVICE BROUGHT IT IN AND I EXPLAINED THE ISSUE OF LOSS OF CONTROL AND AN UNSAFE CONDITION. THE SERVICE ADVISOR IMMEDIATELY TOLD ME TO "PUT WEIGHT IN THE BACK OF THE TRUCK. THAT'S NORMAL." I INVOLVED THE SERVICE MANAGER WHO WENT WITH ME OVER THE SAME ROUTE THAT CAUSED THE SAFETY ISSUE. HE SAID, "I SEE WHAT YOU WERE TALKING ABOUT." THE DEALERSHIP TOOK THE TRUCK IN FOR INSPECTION. NOTHING WAS FOUND MECHANICALLY. DURING THE INSPECTION, THE REAR TIRE PRESSURE WAS LOWERED TO 65 PSI INSTEAD OF THE RECOMENDED 80 PSI THAT WAS SET PRIOR FROM THE MANUFACTURER. THE TIRE PRESSURE MONITOR SYSTEM WAS RE-CALIBRATED TO SHOW THE LOWERED TIRE PRESSURE, FRONT PRESSURES WERE LEFT AT THE RECOMMENDED 65 PSI. I AM NOW CONCERNED WITH EXCESSIVE TIRE WEAR RUNNING THE TIRES UNDER-INFLATED. <u>THE DEALERSHIP CALLED FORD AND WAS ADVISED</u> <b>IT IS A "NORMAL CONDITION" TO ALMOST ROLL OVER A PICKUP WITH SUCH A</b> <b>STIFF SUSPENSION WITHOUT A LOAD IN THE BACK CONSTANTLY, FORD IS</b> <b>UNAWARE OF ISSUE.</b> LOWERED TIRE PRESSURES SLIGHTLY IMPROVED THE SAFETY ISSUE ON PAVEMENT, HOWEVER: YESTERDAY I WAS TRAVELING ON A ROAD THAT HAD THE PAVEMENT REMOVED DOWN TO DIRT FOR REPAVING. I AGAIN HIT A WASHBOARD, THIS TIME GOING STRAIGHT AND 25 MILES PER HOUR. THE SAME VIBRATE/SHAKING OCCURRED AND THE BACK END AGAIN SWUNG TO THE RIGHT WITHOUT ANY BRAKING WHATSOEVER. I WAS CLOSE TO LOSING CONTROL. *TR <b>1 Affected Product</b>
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	August 11, 2017 NHTSA ID NUMBER: 11014734 Components: SUSPENSION NHTSA ID Number: 11014734 Incident Date July 25, 2016 Consumer Location SAHUARITA, AZ Vehicle Identification Number 1FT7W2BT1GE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 VEHICLE EXPERIENCES SEVERE BOUNCE BETWEEN 70-75 MPH. FORD HAS CONFIRMED ISSUE AND HAS STATED IT IS A "CHARACTERISTIC OF THE VEHICLE". <u>ISSUE WAS</u> <u>REPORTED TO DEALER AND FORD AT TIME OF PURCHASE.</u> BOUNCE IS VERY PRONOUNCED AND VEHICLE IS NOT SAFE DURING OPERATION. 1 Affected Product
27 28	December 12, 2017 NHTSA ID NUMBER: 11054256 Components: STEERING NHTSA ID Number: 11054256
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1 2 3 4 5 6 7 8 9 10 11 12	Incident Date October 12, 2017 Consumer Location MASON, TX Vehicle Identification Number 1FDRF3FT1GE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2016 FORD F-350. WHILE DRIVING VARIOUS SPEEDS, THE VEHICLE BEGAN TO SHAKE VIOLENTLY WITHOUT WARNING. THE FAILURE RECURRED RANDOMLY. THE VEHICLE WAS TAKEN TO THE LOCAL DEALER (MCLEAN FORD OF FREDERICKSBURG, 1279 US-87, FREDRICKBURG, TX 78624), BUT THE CAUSE OF THE FAILURE COULD NOT BE DETERMINED. THE VEHICLE WAS ALSO TAKEN TO AN INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE STEERING DAMPER FAILED AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND DID NOT ASSIST. THE FAILURE MILEAGE WAS APPROXIMATELY 14,000. 1 Affected Product
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	March 15, 2018 NHTSA ID NUMBER: 11079671 Components: SUSPENSION NHTSA ID Number: 11079671 Incident Date March 7, 2018 Consumer Location TULSA, OK Vehicle Identification Number 1FT7W2BT1HE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 ON HIGHWAY - THE FRONT-END AND STEERING WHEEL BEGAN TO WOBBLE BACK AND FORTH, UNCONTROLLABLY AND VIOLENTLY REQUIRED BREAKING TO AROUND 20 MPH BEFORE GAINING CONTROL. IT IS DESCRIBED ON BOTH THE INTERNET AND SOME DEALERS AS "DEATH WOBBLE" THIS HAPPENED THREE TIMES OVER A SEVEN (7) HOUR DRIVE FROM CO TO OK AT SPEEDS OF 70, 65 AND 60MPH. FORD MOTOR CO REFUSED TO BUY BACK THE VEHICLE AND REFUSES TO ADMIT THERE IS AN ISSUE. I ASKED THEM TO BUY BACK THE VEHICLE. THEY WOULD NOT. I SOLD THE VEHICLE BACK TO THE FORD DEALER AT A \$13,000 LOSS. I WILL LOOK FORWARD TO JOINING THE CLASS-ACTION LAW SUIT WHEN FILED AS IT IS A MATTER OF TIME VERSES "IF" ONE WILL BE FILED. NO PICTURES JUST GOOGLE "FORD DEATH WOBBLE" 1 Affected Product
28	March 19, 2018 NHTSA ID NUMBER: 11080144 Components: STEERING, SUSPENSION -187-
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1 2 3 4 5 6 7 8 9 10 11	NHTSA ID Number: 11080144 Incident Date March 6, 2018 Consumer Location WASHINGTON, IA Vehicle Identification Number 1FT7W2BT7HE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2017 FORD F-250 SD. WHILE DRIVING 70 MPH, THE FRONT END OF THE VEHICLE EXPERIENCED A "DEATH WOBBLE". THE FAILURE IMPACTED THE STEERING AND CAUSED THE STEERING WHEEL TO VIBRATE VIOLENTLY. THERE WERE NO WARNING INDICATORS ILLUMINATED. MCGRATH FORD (4001 1ST AVE SE, CEDAR RAPIDS, IA 52402) DIAGNOSED THAT THE CONTROL ARM FAILED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED AFTER THE REPAIR. <u>THE MANUFACTURER</u> <u>WAS NOTIFIED AND FILED CASE NUMBER: 14400173</u> . THE FAILURE MILEAGE WAS 19,500. THE VIN WAS NOT AVAILABLE. *TT 1 Affected Product 1 Associated Document
13	
14	October 26, 2018 NHTSA ID NUMBER: 11142955
15	Components: STEERING, SUSPENSION NHTSA ID Number: 11142955
16	Incident Date August 31, 2018 Consumer Location LOS GATOS, CA
17	Vehicle Identification Number N/A
18	Summary of Complaint
	CRASHNo FIRENo
19	INJURIES0
20	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2017 FORD F-250 SD. THE CONTACT STATED THAT THE
21	VEHICLE EXPERIENCED A "DEATH WOBBLE" WHILE DRIVING HIGHWAY SPEEDS. WHEN
22	THE VEHICLE WAS DRIVEN OVER 70 MPH, IT WAS EXTREMELY DIFFICULT FOR THE CONTACT TO OPERATE THE VEHICLE. THE DEALER (GALPIN FORD, 15505 ROSCOE BLVD,
23	NORTH HILLS, CA 91343, 1-(818) 787-3800) KEPT THE VEHICLE FOR MONTHS, BUT COULD
24	NOT DIAGNOSE OR REPAIR THE VEHICLE. THE DEALER DID NOT PROVIDE A LOANER VEHICLE OPTION DURING THAT TIME. <u>THE MANUFACTURER WAS NOTIFIED OF THE</u>
25	FAILURE AND THE CONTACT WAS WAITING ON THEIR RESPONSE. THE VIN AND
	FAILURE MILEAGE WERE NOT AVAILABLE. 1 Affected Product
26	
27	
28	December 7, 2018 NHTSA ID NUMBER: 11156845 Components: ELECTRONIC STABILITY CONTROL, SUSPENSION
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1 2 3 4 5 6 7 8 9 10 11 12	NHTSA ID Number: 11156845 Incident Date October 1, 2018 Consumer Location SEMINOLE, FL Vehicle Identification Number 1FT7W2BT0HE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2017 FORD F-250. WHILE DRIVING VARIOUS SPEEDS ON A CLEAR ROAD SURFACE, THE VEHICLE SHOOK VIOLENTLY OUT OF CONTROL. AS A RESULT, THE STEERING COLUMN SHOOK VIOLENTLY. THE CONTACT STATED THAT THE STEERING WHEEL NEEDED TO BE HELD WITH EXTREME FORCE TO KEEP THE VEHICLE IN ITS LANE. THE CONTACT STATED THAT THE FAILURE WAS EXPERIENCED ON A DAILY BASIS AND THE SHAKING FAILURE WORSENED. THE VEHICLE WAS NOT TAKEN TO A DEALER. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. <u>THE</u> <u>MANUFACTURER WAS CONTACTED.</u> THE APPROXIMATE FAILURE MILEAGE WAS 8,000. 1 Affected Product
13	
14	February 28, 2018 NHTSA ID NUMBER: 11075516 Components: STEERING
15	NHTSA ID Number: 11075516
16	Incident Date June 30, 2017 Consumer Location ALMA, IL
17	Vehicle Identification Number 1FT7W2BT2HE****
18	Summary of Complaint CRASHNo
19	FIRENo INJURIESO
20	DEATHS0
21	TL* THE CONTACT OWNS A 2017 FORD F-250 SD. THE CONTACT STATED THAT THERE WAS A DEATH WOBBLE ON THE FRONT END OF THE VEHICLE. THE FAILURE IMPACTED
22	THE STEERING AND CAUSED A STRONG VIBRATION IN THE STEERING WHEEL. THE
23	DEALER (SCHMIDT FORD OF SALEM, 1815 W MAIN ST, SALEM, IL 62881, (800) 562-2014) STATED THAT THE STEERING STABILIZER WAS ON A NATIONAL BACKORDER AND
23	THAT THEY WOULD ADJUST THE CASTERS AND ROTATE THE TIRES. THE
24	MANUFACTURER ISSUED TWO TSBS FOR THE STEERING. THE MANUFACTURER WAS NOTIFIED AND CONFIRMED THAT THE PART WAS ON A NATIONAL BACKORDER. <u>THE</u>
	MANUFACTURER WAS TO RESPOND TO THE CONTACT TO ADDRESS THE REPAIR
26	<b>SOLUTION.</b> THE APPROXIMATE FAILURE MILEAGE WAS 16,000. <b>1 Affected Product</b>
27	
28	November 13, 2018 NHTSA ID NUMBER: 11151224
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1	Components: STEERING
2	NHTSA ID Number: 11151224
3	Incident Date October 27, 2018 Consumer Location GRIMESLAND, NC
_	Vehicle Identification Number 1FT7W2B65HE****
4 5	Summary of Complaint CRASHNo
6	FIRENo INJURIESO
7	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2017 FORD F-250. WHILE DRIVING APPROXIMATELY 70 MPH,
8	THE VEHICLE SHOOK VIOLENTLY AND THE STEERING WHEEL TURNED RIGHT AND LEFT. THE CONTACT ALMOST LOST CONTROL OF THE VEHICLE. THERE WAS NO
9	WARNING INDICATOR ILLUMINATED. THE FAILURE RECURRED. THE VEHICLE WAS
10	TAKEN TO DEACON JONES FORD-LINCOLN, INC. (919-736-3387, LOCATED AT 3301 MCLAIN ST, GOLDSBORO, NC 27534) WHERE IT WAS STATED THAT THE FAILURE WAS A
11	KNOWN OCCURRENCE, BUT THERE WAS NEITHER A RECALL NOR A QUALIFIED
12	TECHNICIAN TO REMEDY THE FAILURE. THE TECHNICIAN STATED THAT THE VEHICLE WAS NOT MANUFACTURED BY THE DEALER. <u>THE MANUFACTURER WAS MADE</u>
13	AWARE OF THE FAILURE AND PROVIDED A CASE NUMBER. THE VEHICLE WAS NOT
13	REPAIRED. THE FAILURE MILEAGE WAS APPROXIMATELY 24,000.  1 Affected Product
15	November 13, 2018 NHTSA ID NUMBER: 11151155
16	Components: STEERING, SUSPENSION
17	NHTSA ID Number: 11151155 Incident Date November 12, 2018
	Consumer Location SIOUX FALLS, SD
18	Vehicle Identification Number 1FT8W3BT0HE**** Summary of Complaint
19	CRASHNo
20	FIRENo INJURIES0
21	DEATHS0
22	TL* THE CONTACT OWNS A 2017 FORD F-350 SD. THE CONTACT STATED THAT THE VEHICLE HAD AN EXTENSIVE "DEATH WOBBLE", WHICH CAUSED IT TO BE UNSTABLE
23	WHEN DRIVING OVER 70 MPH. THE CONTACT HAD TO APPLY EXTREME FORCE TO THE STEERING WHEEL TO MANEUVER THE VEHICLE. THE DEALER (SIOUX FALLS FORD, 4901
24	W 26TH ST, SIOUX FALLS, SD 57106, (605) 361-0361) STATED THAT THE BUSHINGS WERE
25	WORN AND NEEDED TO BE REPLACED. <u>THE MANUFACTURER WAS NOTIFIED OF THE</u> FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 28,000.
26	1 Affected Product
27	
28	December 5, 2018 NHTSA ID NUMBER: 11156425 Components: STEERING, SUSPENSION
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1 2 3 4 5 6 7 8 9 10	NHTSA ID Number: 11156425 Incident Date December 1, 2018 Consumer Location SAN RAMON, CA Vehicle Identification Number 1FT8W3DT2HE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 2017 F350 SUPERDUTY DRW, 27000 MILES. WHILE ON THE FREEWAY AT 65 MPH, THE STEERING WENT INTO AN UNCONTROLLABLE VIBRATION (DEATH WOBBLE). THE ONLY SOLUTION WAS TO REDUCE SPEED TO APPROXIMATELY 10 MPH. <u>CONTACTED THE</u> DEALER AND FORD'S CUSTOMER SERVICE, AND WAS INFORMED THAT IT MUST BE WITNESSED BY AN OFFICIAL SERVICE TECHNICIAN BEFORE ANY ASSISTANCE COULD BE RENDERED. 1 Affected Product
11	
12	January 23, 2019 NHTSA ID NUMBER: 11171598
13	Components: STEERING NHTSA ID Number: 11171598
14	Incident Date June 6, 2017
	Consumer Location PORTSMOUTH, IA
15	Vehicle Identification Number 1FT8W3BT0HE**** Summary of Complaint
16	CRASHNo
17	FIRENo
18	INJURIES0
10	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2017 FORD F-350. EACH TIME THE VEHICLE DROVE OVER A
19	BUMP IN THE ROAD, THE STEERING WHEEL SHOOK UNCONTROLLABLY. THE CONTACT
20	HAD TO DEPRESS THE BRAKE PEDAL TO STOP THE SHAKING. THE CONTACT STATED
21	THAT THE FAILURE WAS CALLED THE "DEATH WOBBLE". THERE WERE NO WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO MCMULLEN FORD (LOCATED
22	AT 3401 S EXPRESSWAY ST, COUNCIL BLUFFS, IA 51501, (712) 366-0531) AND THE TIE ROD WAS REPLACED. THE CONTACT STATED THAT THE REPLACEMENT OF THE TIE ROD DID
23	NOT CORRECT THE FAILURE. THE VEHICLE WAS ALSO TAKEN TO WOODHOUSE FORD
24	(LOCATED AT 2546 US-30, BLAIR, NE 68008, (402) 426-4126) AND THE STEERING
	STABILIZER SHOCK WAS REPLACED, BUT IT DID NOT CORRECT THE FAILURE. <u>THE</u> MANUFACTURER WAS NOTIFIED AND DID NOT ASSIST. THE APPROXIMATE FAILURE
25	MILEAGE WAS 85,000.
26	1 Affected Product
27	
28	October 2, 2018 NHTSA ID NUMBER: 11132889 Components: STEERING
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1	<b>NHTSA ID Number:</b> 11132889
2	Incident Date September 17, 2018 Consumer Location KANSAS CITY, MO
3	Vehicle Identification Number 1FT8W3BT7JE****
C	Summary of Complaint
4	CRASHNo FIRENo
5	INJURIES1
6	DEATHS0 TL* THE CONTACT OWNS A 2018 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 60
7	MPH AND PULLING A 40 FOOT FIFTH WHEEL, THE VEHICLE DROVE OVER AN
8	EXPANSION JOINT ON THE ROAD. THE FRONT END OF THE VEHICLE BEGAN
9	OSCILLATING SEVERELY, BOUNCING ACROSS TWO LANES OF TRAFFIC. THE CONTACT MANAGED TO PULL OVER TO THE ROAD SHOULDER AND WAITED A COUPLE OF
-	MINUTES BEFORE CONTINUING TO DRIVE. WHILE ATTEMPTING TO CONTROL THE
10	VEHICLE, THE CONTACT SUSTAINED A TORN LEFT SHOULDER MUSCLE BECAUSE THE STEERING WHEEL SHOOK SO VIOLENTLY. MEDICAL ATTENTION WAS ONGOING AND
11	SURGERY WAS REQUIRED. THE VEHICLE WAS TAKEN TO THE DEALER (BROADWAY
12	FORD INC, 980 W BROADWAY STREET, IDAHO FALLS, ID 83402) WHERE IT WAS
13	DIAGNOSED THAT THERE WAS STEERING OSCILLATION (PART OF TSB NUMBER: 18- 2268). THE VEHICLE WAS REPAIRED. <u>THE MANUFACTURER WAS NOTIFIED OF THE</u>
14	FAILURE AND PROVIDED CASE NUMBER: CAS-15812304. THE APPROXIMATE FAILURE
	MILEAGE WAS 8,200. *TT *JB
15	1 Affected Product 1 Associated Document
16	
17	
18	43. In addition, another 337 consumer complaints registered with NHTSA expressly refer to
19	the complainant having notified an authorized Ford dealer of the Death Wobble defect.
	44. Finally, as discussed in the following section, Defendant's own Technical Service
20	Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect.
21	C. Ford's Active Concealment of the Suspension Defect
22	45. Ford through its service records and customer service division has acknowledged the
23	
24	existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to
25	the true nature and existence of the defect to Plaintiff, Class Members, and consumers.
25	46 By way of example of the 1 265 Death Wobble complaints registered with NHTSA from

46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from 2005 through 2019, 337 of the complaints expressly reference the complainant having notified an authorized Ford dealer of having experienced the death wobble. Of those 337 complaints, 88 of the

26

27

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complainants indicated that they were told by the authorized Ford dealer either that they could not 1 2 identify the problem or that they had never heard of the Death Wobble.

47. 3 And even when Defendant Ford and its authorized dealers did acknowledge the Death Wobble issue, in numerous instances, they identified the cause of the Death Wobble as resulting from items that were not covered under warranty, such as tire pressure, tires, tire balancing and rotation, and wheel alignment.

7 48. In other instances, Defendant Ford and its authorized dealers recommended the 8 replacement of a wide array of components that they know were not effective in eliminating Death 9 Wobble., charging its customers thousands of dollars in service costs in the process.

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1. NHTSA Consumer Complainants Expressly Referencing Defendant Ford and/or its Authorized Dealers Denying Knowledge of the Death Wobble Issue or Claiming that the Problem Could Not be Identified

49. The following are the consumer complaints submitted to NHTSA where the Complainant

14 States that Defendant Ford and/or its authorized dealer either denied any knowledge of the Death

15 Wobble issue or claimed that it could not identify any problem with the vehicle.

16 January 18, 2008 NHTSA ID NUMBER: 10215392 **Components: SUSPENSION** 

17 **NHTSA ID Number:** 10215392

- Incident Date December 22, 2007 18
- Consumer Location NORTH LAS VEGAS, NV
- 19 Vehicle Identification Number 1FTSX21Y65E\*\*\*\*
- **Summary of Complaint** 20
- CRASHNo FIRENo 21
  - **INJURIES0**
- 22 **DEATHS0**
- ON SEVERAL OCCASIONS WHILE TRAVELING OVER SPEEDS OF 55 MPH, THE VEHICLE 23 SHAKES UNCONTROLLABLY IF YOU HIT A FLAW IN THE ROAD, SUCH AS A BUMP. IT HAS CAUSE MYSELF AND WIFE TO NEARLY LOSE CONTROL OF THE VEHICLE. 24
- FORTUNATELY THERE WERE NO OTHER VEHICLES CLOSE AS ON ONE OCCASION THE 25 TRUCK CHANGED LANES WHILE SHAKING VIOLENTLY. I AM A FORMER TRUCK
- MECHANIC AND HAVE NEVER SEEN ANYTHING LIKE THIS. THE DEALER HAS TOLD US 26 THAT THERE IS NO PROBLEM, YET I VIEW THIS AS A POTENTIALLY LIFE
- THREATENING ISSUE, WE HAVE NOT DRIVEN THE VEHICLE ON THE HIGHWAY SINCE 27 THE LAST EPISODE. \*TR
- 28 **1 Affected Product**

**Class Action Complaint** Case No.

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1	
2	
3	February 27, 2008 NHTSA ID NUMBER: 10219302 Components: SUSPENSION
4	NHTSA ID Number: 10219302 Incident Date November 1, 2007
5	Consumer Location MOSCOW, ID Vehicle Identification Number 1FTSX21535E****
6	Summary of Complaint
_	CRASHNo
7	FIRENO
8	INJURIES0 DEATHS0
9	VEHICLE STARTS TO SHAKE UNCONTROLLABLY AFTER HITTING A SMALL BUMP
10	(POTHOLE, BRIDGE CONNECTOR) AT HIGHWAY SPEEDS (50-70 MPH). VEHICLE IS DIFFICULT TO CONTROL, AND STEERING IS SOMETIMES UNRESPONSIVE UNTIL
11	VEHICLE SLOWS DOWN BELOW 40 MPH. THIS PROBLEM HAS CAUSED THE VEHICLE TO
12	VEER TO THE LEFT ACROSS THE CENTER LINE, BUT THIS DOES NOT ALWAYS OCCUR. LOCAL DEALERS HAVE INSPECTED THE VEHICLE AND FOUND NO PROBLEMS WITH
12	SUSPENSION OR CONTROL COMPONENTS. INCIDENT DATE IS JUST ONE OF AT LEAST
14	3 OCCURRENCES. WEB BASED USER GROUP/BULLETIN BOARDS REFER TO THIS PROBLEM AS THE 'DEATH WOBBLE' OR 'DEATH SHAKE' BECAUSE OF ITS VIOLENT
14	NATURE, TENDENCY TO OCCUR AT HIGH SPEED, AND TENDENCY TO CAUSE THE
15	VEHICLE TO DRIFT OFF THE ROAD. *TR
16	1 Affected Product
17	
18	January 5, 2009 NHTSA ID NUMBER: 10253778
	Components: SUSPENSION NHTSA ID Number: 10253778
19	Incident Date January 15, 2006
20	Consumer Location ORLANDO, FL
21	Vehicle Identification Number N/A
	Summary of Complaint
22	CRASHNo FIRENo
23	INJURIES0
24	DEATHSO
	VIOLENT SHUDDER AND STEERING OSCILLATION. THIS FIRST HAPPENED AFTER
25	DRIVING OVER A SLIGHT DROPOFF AT ABOUT 60MPH AND THE WHOLE TRUCK SHUDDERED SO VIOLENTLY I HAD TO BRAKE AND ATTEMPT TO STEER THE VEHICLE
26	TO THE MEDIAN (THIS WAS HARD TO DO). THIS HAS HAPPENED FREQUENTLY SINCE
27	AND HAPPENS AT LOW SPEEDS ALSO (40MPH) THE STEERING WHEEL HAS BEEN SHAKEN OFF CENTER DUE TO THIS. MY WIFE WILL NOT DRIVE THE VEHICLE AS ITS
28	QUITE SCARY WHEN THIS HAPPENS AT RELATIVELY HIGH SPEEDS AND IS VERY
	SUDDEN AND UNEXPECTED, I ALSO WILL NOT ALLOW MY CHILDREN TO RIDE IN THE
	-194- Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.195 Page 195 of 353
1	VEHICLE AS I FEEL A BAD EPISODE OF THIS SHIMMY/SHUDDER COULD EASILY CAUSE
	AN ACCIDENT. I HAVE ALSO GONE THROUGH 5 SETS OF TIRES (IN UNDER 70,000 MILES)
2	DUE TO BEING UNABLE TO KEEP THE FRONT END ALIGNED. I WAS QUITE UPSET AFTER THE FIRST INCIDENT AND IMMEDIATELY BROUGHT THE TRUCK TO THE NEAREST FORD
3	DEALER TO HAVE IT LOOKED AT. THEY SAID THEY HAD NEVER HEARD OF
4	ANYTHING LIKE THIS AND LOOKED AT ME LIKE I WAS MAKING THIS UP. (AND I
5	ADMIT IT SOUNDS CRAZY FOR A \$40,000 TRUCK TO BEHAVE THIS WAY). THEY SAID THERE WAS NOTHING WRONG AND SAID I NEEDED MY FIRST SET OF NEW TIRES AND
6	AN ALIGNMENT (AT 12,000 MILES). A FEW MONTHS LATER I CAME BACK INTO THE
7	SAME FORD DEALER WITH THE SAME ISSUE AND WAS TOLD THERE WAS NOT MUCH THAT COULD BE DONE AS BASED ON MY PREVIOUS VISIT MY TRUCK
8	APPEARED FINE. I WAS VERY DISSATISFIED WITH THIS LEVEL OF CUSTOMER SERVICE
	AND WALKED OUT. I AM NOW STUCK WITH A TRUCK THAT SHUDDERS VIOLENTLY
9	SEVERAL TIMES A DAY, I AM UNABLE TO SELL THE VEHICLE AS NOBODY WOULD EVER BUY IT IN THIS CONDITION AND FEEL AS IF I HAVE BEEN TAKEN ADVANTAGE OF BY
10	THE FORD MOTOR COMPANY, AS IT APPEARS THEY HAVE ACKNOWLEDGED THIS
11	DEFECT AND HAVE CHOSEN TO DO NOTHING ABOUT IT FOR THEIR CUSTOMERS. THIS IS MY 5TH AND LAST FORD TRUCK I UNDERSTAND THAT NOTHING IS PERFECT AND
12	THINGS CAN GO WRONG BUT MY COMPLAINTS ALONG WITH OTHERS
13	HAVE BEEN IGNORED AND I FEEL MY TRUCK IS POSES A REAL DANGER TO ANYONE WHO RIDES IN IT. *TR
14	1 Affected Product
15	April 4, 2009 NHTSA ID NUMBER: 10264111
16	Components: STEERING, SUSPENSION
17	NHTSA ID Number: 10264111 Insident Data April 1, 2000
18	Incident Date April 1, 2009 Consumer Location PUYALLUP, WA
19	Vehicle Identification Number 1FTSW21P05E****
20	Summary of Complaint CRASHNo
-	FIRENo
21	INJURIES0
22	DEATHS0 DRIVING AT SPEED. 2005 FORD F-250 VIOLENT FRONT END DEATH WOBBLE, DEALER
23	SAID IT NEEDED ALIGNMENT, THEN SAID IT WAS MY TIRES, WITH NEW TIRES IT STILL
24	DID IT. <u>DEALER SAID THAT IT WAS OKAY. NOTHING WRONG.</u> UNTIL YESTERDAY WHILE DRIVING TO INTER FREEWAY,AT 45MPH SLIGHT ROUGH ROAD SENT MY FORD
25	TRUCK INTO VIOLENT DEATH WOBBLE ALMOST CAUSED AN ACCIDENT, BY HITTING
	CONCRETE BARRIER. LOST TOTAL CONTROL OF MY TRUCK. I'VE CONTACTED LEGAL
26	COUNSEL TO SEE WHAT MY OPTIONS WILL BE, ALSO INFORMED TO MAKE CONTACT WITH DEALER SHIP TO SEE WHAT THEY INTEND TO DO. I HAVE EXTENDED WARRANTY
27	ON MY TRUCK. DOES THIS FALL UNDER WARRANTY? OR LAW SUIT? *TR
28	1 Affected Product
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	Class Astism Complaint

Class Action Complaint Case No.

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May 31, 2009 NHTSA ID NUMBER: 10272442 Components: SUSPENSION, STEERING
NHTSA ID Number: 10272442 Incident Date April 25, 2008
Consumer Location Unknown
Vehicle Identification Number 1FTSW21Y65E**** Summary of Complaint
CRASHNo FIRENo
INJURIES0
<b>DEATHS0</b> FRONT END INSTABILITY, EXTREME VIBRATION, LOSS OF STEERING AT HIGHWAY
SPEED AFTER HITTING ROUGH PAVEMENT. HAVE HAD VIBRATION AND BOUNCE IN
FRONT END SINCE VEHICLE WAS PURCHASED NEW DEC 2004. <u>REPEATED RETURN TO</u> DEALERSHIP BUT UNABLE TO FIND POINT CAUSE. APRIL 25, 2005 CRUISE CONTROL
AT 75MPH ON I4 FLORIDA ROUGH ASPHALT TRIGGERED SEVERE SHIMMY AND
VIBRATION, LOSS OF STEERING (UNABLE TO PULL TO SAFETY LANE). CONTROL REGAINED ONLY BY BRAKING IN BUSY HIGHWAY SPEED TRAFFIC UNTIL VIBRATION
CEASED. TIRES ARE NEW, ROTATED AT 3,000 AND KEPT AT FACTORY PRESSURE. THESE
EVENTS HAVE OCCURRED SPORADICALLY SINCE PURCHASE IN DEC 2004. *TR <b>1 Affected Product</b>
June 5, 2009 NHTSA ID NUMBER: 10272963
Components: STEERING, SUSPENSION NHTSA ID Number: 10272963
Incident Date April 26, 2009
Consumer Location Unknown Vehicle Identification Number 1FTSX21595E****
Summary of Complaint
CRASHNo FIRENo
INJURIES0
DEATHSO I HAVE A 2005 FORD F250 SD PICKUP TRUCK THAT HAS 25,000 MILES ON IT. I HAS BEGUN
TO EXPERIENCE A VIOLENT FRONT END SHAKING AT HIGHWAY SPEED WHEN GOING
OVER EVEN THE SMALLEST OF BUMPS. YOU NEED TO ALMOST STOP IN THE MIDDLE OF THE HIGHWAY TO MAKE IT STOP. THE DEALER SAYS THEY DON'T KNOW OF ANY
PROBLEMS AND SO DOES FORD. BUT LOOKING ON-LINE IT IS VERY OBVIOUS THAT
THIS IS A REAL ISSUE AND NEEDS TO BE RECALLED. IT IS ALSO REFERENCED AS "DEATH WOBBLE". *TR
1 Affected Product
June 25, 2011 NHTSA ID NUMBER: 10408904
-196- Class Action Complaint
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.197 Page 197 of 353
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Components: SUSPENSION NHTSA ID Number: 10408904 Incident Date June 17, 2011 Consumer Location HENDERSON, NV Vehicle Identification Number 1FTSW21P65E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO 2005 FORD F-250 SUPER DUTY, 69,000 MILES. TRAVELING APPROX 65 MPH, HIT A SMALL BUMP IN THE HIGHWAY AND THE FRONT SUSPENSION STARTED TO SHAKE UNCONTROLLABLY, I VERY NEARLY LOST COMPLETE CONTROL OF THE TRUCK. THIS NEVER HAPPENED BEFORE, BUT HAS HAPPENED TWICE SINCE. THE TIRE PRESSURE WAS CORRECT AT THE TIME OF THE FIRST INCIDENT, THE TIRES WERE BALANCED AND THE LUG NUTS WERE TORQUED TO FORD SPECS. REPLACED FRONT STEERING DAMPER, DID NOT RESOLVE THE PROBLEM. <u>TALKED TO THE FORD DEALER AND THEY DENIED</u> <u>ANY KNOWLEDGE OF A SIMILAR PROBLEM.</u> AFTER A FEW HOURS RESEARCH ONLINE, THIS PROBLEM IS WELL DOCUMENTED AND FREQUENT WITH THE FORD SUPER DUTY LINE FROM 05"-08". IT SEEMS TO BE AN ENGINEERING DEFECT AND FORD IS WELL AWARE OF THE PROBLEM, BUT IT DOES APPEAR THAT FORD HAS OFFERED ANY REMEDIES. THE NHTSA ALSO KNOWS OF THE PROBLEM. I VIEWED FOUR NHTSA VIDEOS THAT DEMONSTRATED THE IDENTICAL PROBLEM THAT 1 AM EXPERIENCING WITH MY TRUCK. I HAVE FOUND NO ACTION ON THE PART OF THE NHTSA. THIS PROBLEM NEEDS TO BE ACKNOWLEDGED AND CORRECTED BEFORE SOMEONE IS KILLED. *TR 1 Affected Product
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	May 14, 2012 NHTSA ID NUMBER: 10458496 Components: STEERING, SUSPENSION NHTSA ID Number: 10458496 Incident Date May 15, 2008 Consumer Location GARDEN GROVE, CA Vehicle Identification Number 1FTSW21P95E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 2005 FORD F-250 SUPER DUTY, STARTED AT @ 25,000 MILES IN 2008 AND STILL HAPPENS TODAY. HAPPENS WHEN TRAVELING OVER 60 MPH, WHEN YOU HIT ANY SMALL BUMP IN THE ROAD, THE FRONT SUSPENSION STARTED TO SHAKE UNCONTROLLABLY. IT IS VERY HARD TO CONTROL THE TRUCK. THIS HAPPENS ALL THE TIME ON THE FREEWAY. THE TIRE PRESSURE WAS CORRECT AT THE TIME OF THE FIRST INCIDENT, THE TIRES WERE BALANCED AND THE LUG NUTS WERE TORQUED TO FORD SPECS. <u>TALKED TO</u> -197- Class Action Complaint
	Class Action Complaint Case No.

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1 2 3 4 5 6 7	THE FORD DEALER AND THEY DENIED ANY KNOWLEDGE OF A SIMILAR PROBLEM. AFTER A FEW HOURS RESEARCH ONLINE, THIS PROBLEM IS WELL DOCUMENTED AND FREQUENT WITH THE FORD SUPER DUTY LINE FROM 05"-08". IT SEEMS TO BE AN ENGINEERING DEFECT AND FORD IS WELL AWARE OF THE PROBLEM, BUT IT DOES APPEAR THAT FORD HAS OFFERED ANY REMEDIES. THE NHTSA ALSO KNOWS OF THE PROBLEM. I VIEWED FOUR NHTSA VIDEOS THAT DEMONSTRATED THE IDENTICAL PROBLEM THAT I AM EXPERIENCING WITH MY TRUCK. I HAVE FOUND NO ACTION ON THE PART OF THE NHTSA. THIS PROBLEM NEEDS TO BE ACKNOWLEDGED AND CORRECTED BEFORE SOMEONE IS KILLED. *JS 1 Affected Product
8 9 10	December 5, 2012 NHTSA ID NUMBER: 10487500 Components: SUSPENSION, STEERING NHTSA ID Number: 10487500
10 11 12 13	Incident Date November 30, 2005 Consumer Location LYNDEN, WA Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo
14 15 16	INJURIES0 DEATHS0 WHILE DRIVING DOWN THE ROAD, HIT A SMALL POTHOLE IN THE ROAD AND THE SUSPENSION STARTED TO VIOLENTLY SHAKE THE TRUCK ALONG WITH SEVERE
17 18	STEERING WHEEL OSCILLATIONS. NO CONTROL OF THE VEHICLE UNTIL I COULD GET SLOWED DOWN ENOUGH TO STOP THE OSCILLATIONS. I HAVE HAD THIS HAPPEN ON MY TRUCK MULTIPLE TIMES THROUGHOUT THE YEARS AT SPEEDS ANYWHERE FROM 30 TO 60 MPH AND CONTRARY TO OTHER REPORTS LISTED ON HERE, THE TIRE PRESSURE WAS CORRECT AND MADE NO DIFFERENCE. I HAVE PUT ON AFTERMARKET
19 20 21	SUSPENSION AND TIRES SINCE THE ORIGINAL TIME THIS HAPPENED AND ADDED A STEERING STABILIZER WHICH HELPED TO KEEP THIS FROM OCCURRING BUT IT STILL HAPPENS ON OCCASION. <b>THIS PROBLEM WAS BROUGHT UP TO MY DEALER AT THE</b> <b>BEGINNING AND THEY SAID THEY COULD FIND NO PROBLEMS.</b> THE SHAKING AND BEATING OF THE VEHICLE WHEN THIS OCCURS IS UNBELIEVABLE. I FULLY BELIEVE
<ul><li>22</li><li>23</li><li>24</li><li>25</li></ul>	THIS IS WHAT HAS CAUSED ME TO HAVE A BROKEN RIM, ELECTRICAL ISSUES, BRAKE PROBLEMS, AND WHAT I BELIEVE IS A CRACKED TURBO UP PIPE OR SOMETHING ELSE THAT IS ALLOWING EXHAUST FUMES INTO THE CAB. *TR 1 Affected Product
25 26 27 28	December 6, 2005 NHTSA ID NUMBER: 10144546 Components: STEERING NHTSA ID Number: 10144546 Incident Date July 30, 2005 Consumer Location LAS CRUCES, NM -198-
	Class Action Complaint Case No.

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1	Vehicle Identification Number 1FTSW21505E**** Summary of Complaint
2	CRASHNo
3	FIRENO
4	INJURIES0 DEATHS0
5	WHILE TRAVELING ON THE HIGHWAY AT 75 MPH AS I HIT BUMPS IN THE ROADWAY THE VEHICLE FEELS LIKE THE FRONT WHEELS ARE HOPPING. ON 5 OCCASIONS I WAS
6	TRAVELING OVER AN OVERPASS WERE THERE IS A SEEM FROM THE 2 DIFFERENT
0	ROADWAY SURFACES. THE VEHICLE SHOOK VIOLENTLY FEELING AS IF THE TRUCK
7	WAS GOING TO LOSE CONTROL. THE VEHICLE WAS ALLOWED TO SLOW AND AT ABOUT
8	55 MPH THE SHAKING WOULD STOP. AT SLOWER SPEEDS THE SAME VIBRATION IS FELT BUT AT A MUCH LESS MAGNITUDE AND SEVERITY. THIS LOSS OF CONTROL AS WELL
9	AS THE SLOWING IN LANES OF TRAFFIC COULD CAUSE SERIOUS LOSS OF CONTROL
10	AND CAUSE OF CRASH. <u>DEALER, BORMAN AUTOPLEX LAS CRUCES, NM, HAD NO</u> ANSWER AS THE VIOLENT SHAKING WAS NOT DUPLICATED NEAR OUR CITY. (ALL
11	OCCURRENCES HAPPENED ON TRIPS). DEALER STATED NOTHING WAS WRONG AND
12	THAT SOME PEOPLE SAY THAT PUTTING SANDBAGS IN THE BACK OF THE TRUCK HELPED. THEY ALSO SAID THAT IF THE TIRES WERE KEPT AT THE 75 PSI THAT IT
	WOULD STOP. NOTHING HAS HELPED AND IT IS STILL NOT RESOLVED. *JB
13	1 Affected Product
14	
15	December 20, 2006 NHTSA ID NUMBER: 10176685
16	Components: STEERING NHTSA ID Number: 10176685
17	Incident Date November 15, 2006
	Consumer Location FAYETTEVILLE, AR
18	Vehicle Identification Number 1FDSX21545E****
19	Summary of Complaint CRASHNo
20	FIRENo
21	INJURIESO
21 22	<b>DEATHS0</b> (1) POSSIBLY TRIGGERED BY A MINOR BUMP IN THE ROAD (2) SEVERE STEERING
22	AND/OR FRONT AXLE OSCILLATION RESULTING IN LOSS OF VEHICLE CONTROL. THE OSCILLATION WAS MUCH MORE SEVERE THAN THE COMMON "DEATH WOBBLE" FROM
23	OUT OF BALANCE OR OUT OF ROUND TIRES, AND APPEARED TO INVOLVE NOT JUST THE FRONT TIRES, BUT THE ENTIRE FRONT AXLE. THIS HAS HAPPENED TWICE, ONCE
25	BEFORE THE FIRST SET OF REPAIRS, ONCE AFTER THE FIRST SET OF REPAIRS. VEHICLE
26	RAN COMPLETELY OFF THE HIGHWAY BOTH TIMES. (3) THE FIRST TIME, THE STEERING BOX BROKE AS A RESULT OF THE VIOLENCE OF THE STEERING OSCILLATIONS, SO THE
27	STEERING BOX WAS REPLACED. AFTER THE SECOND TIME THE VEHICLE RAN OFF THE
	ROAD, THE VEHICLE'S ALIGNMENT WAS CHECKED, THE TIRES WERE ROTATED, THE
28	TIRE PRESSURE WAS ADJUSTED. <u>THE DEALER PERFORMED ALL THE STEPS</u> OUTLINED IN A TECHNICAL SERVICE BULLETIN, BUT SAID THAT THEY FOUND
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1 2 3 4 5 6	NOTHING WRONG THAT WOULD ACCOUNT FOR THE PROBLEM. NOW, OUR DRIVERS ARE AFRAID TO DRIVE THIS TRUCK AGAIN. THIS IS A FLEET VEHICLE, AND AFTER SOME INVESTIGATION WE HAVE LEARNED THAT WE HAVE AT LEAST FIVE OTHER TRUCKS OF THIS DESIGN (2005 AND 2006 FORD 4X4 F-250) THAT HAVE EXHIBITED SIMILAR PROBLEMS. WE HAVE BEEN TOLD THAT AN AFTERMARKET STEERING STABILIZER (THAT FORD WILL NEITHER SUPPLY OR STAND BEHIND) WILL FIX THE PROBLEM, BUT WE DON'T BELIEVE IT. IT MIGHT REDUCE THE SYMPTOMS, BUT WE ARE CONVINCED THE PROBLEM IS DESIGN RELATED. THE FRONT END DESIGN ON THESE TRUCKS WAS CHANGED IN LATE 2004, AND THE OSCILLATION PROBLEM APPEARS TO BE RELATED TO A LACK OF
7 8	LATERAL (BY THAT I MEAN SIDE TO SIDE) STIFFNESS IN THE SUSPENSION. *NM 1 Affected Product
9	
10	April 25, 2007 NHTSA ID NUMBER: 10188890 Components: STEERING
11	NHTSA ID Number: 10188890
12	Incident Date April 24, 2007 Consumer Location EASTCHESTER, NY
12	Vehicle Identification Number 1FTSW21565E**** Summary of Complaint
14	CRASHYes FIRENo
15	INJURIES0
16	DEATHS0
	SHORTLY AFTER I PURCHASED MY 2005 FORD F-250 SUPER DUTY PICKUP I EXPERIENCED A VIOLENT VIBRATION IN THE STEERING, WHEN TRAVELING OVER 55
	MPH, AFTER HITTING A SMALL BUMP IN THE ROAD. WHEN I BROUGHT MY TRUCK IN
18 19	FOR SERVICE AND MENTIONED THIS EPISODE. THE SERVICE MANAGER ACTED AS THOUGH IT WERE AN ANOMALY, MAYBE THE ROAD CONDITIONS OR SOMETHING ELSE.
20	THIS DIDN'T SEEM TO BE THE TRUTH, SINCE IT HAPPENED SEVERAL TIMES SINCE THEN. WHEN I BROUGHT IT TO THE ATTENTION OF THE LOCAL SERVICE MANAGER, HE
20	SAID THAT THIS IS COMMON AMONGST THESES LARGE PICKUP TRUCKS, AND JUST TAP
21	THE BRAKES UNTIL THE VIBRATIONS SUBSIDE, IT SHOULDN'T LAST LONG. YESTERDAY I WAS TRAVELING AT ABOUT 60 MILES AN HOUR ON THE HIGHWAY, WHEN I WENT
23	OVER A SEWER GRATE IN THE LEFT LANE. THE VIBRATION BECAME SO VIOLENT THAT I HAD NO CONTROL OF THE STEERING AT ALL. I NARROWLY AVOIDED A COLLISION
23 24	WITH A FUEL TRUCK AND SEVERAL OTHER CARS ON MY WAY OFF THE ROAD AND
24 25	INTO WOODS CAUSING MULTIPLE TIRE DAMAGE, AND SUFFERING DENTS AND DAMAGE TO THE VEHICLE. I THANK GOD NO ONE WAS HURT, INCLUDING ME. I WAS
	ABLE TO DRIVE THE TRUCK AWAY AFTER CHANGING THE TIRES AND CLEANING UP THE MESS FROM MY PERSONAL PROPERTY BEING TOSSED AROUND THE CABIN. NOT
26	ONLY DID I LOOSE STEERING BUT, I WAS SURPRISED THAT SUCH A VIOLENT EPISODE
27	DID NOT DEPLOY THE AIR BAGS. I RETURNED TODAY TO THE DEALER WITH MY
28	TRUCK. THE SERVICE MANAGER HAD BEEN REPLACED, WITH A NEW ONE. WHEN I INFORMED HIM OF THE SITUATION HE CHECKED THE COMPUTER FOR MY RECORDS
	-200-

Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.201 Page 201 of 353
1 2 3 4 5 6	AND MAGICALLY HE WAS ABLE TO FIND EVERY OTHER RECORD OF SERVICE AND REPAIRS, EXCEPT THE STEERING COMPLAINTS. TOMORROW, THE 26TH, I HAVE AN APPOINTMENT WHERE I HOPE TO HAVE THIS CORRECTED. <u>ALTHOUGH THIS SERVICE</u> <u>MANAGER SAYS HE HASN'T HEARD OF ANY PROBLEMS WITH THESE TRUCKS.</u> I WAS SEARCHING THE INTERNET AND FOUND MULTIPLE COMPLAINTS ON DIFFERENT SITES, INCLUDING THE ONE THAT MADE REFERENCE TO YOUR SITE. THROUGH INSURANCE, I HOPE THAT THERE WOULD BE SOME TYPE OF LIABILITY TO THE FORD MOTOR COMPANY. *JB 1 Affected Product
<ul> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> </ul>	July 31, 2007 NHTSA ID NUMBER: 10197931 Components: STEERING NHTSA ID Number: 10197931 Incident Date December 1, 2006 Consumer Location CAMPBELLSBURG, KY Vehicle Identification Number 1FTSX21585E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F-250 SUPERDUTY. THE CONTACT STATED THAT HE LOSES CONTROL OF THE VEHICLE WHEN DRIVING OVER A SPEED BUMP OR A BUMP
16 17 18 19	IN THE ROAD AT 30 MPH. THE VEHICLE BEGINS TO SHAKE UNEXPECTEDLY AND BECOMES DIFFICULT TO STEER. <u>HE TOOK THE VEHICLE TO THE DEALER ONCE, BUT</u> <u>THEY WERE UNABLE TO FIND ANYTHING WRONG.</u> THE CURRENT MILEAGE WAS 32,000 AND FAILURE MILEAGE WAS 16,000. 1 Affected Product
20	March 1, 2010 NHTSA ID NUMBER: 10315150
21	Components: STEERING NHTSA ID Number: 10315150
22	Incident Date February 21, 2010
23	Consumer Location NORTH RICHLAND HILLS, TX Vehicle Identification Number 1FTSW21P75E****
24	Summary of Complaint CRASHNo
25	FIRENo
26	INJURIES0 DEATHS0
27	I HAVE A FORD F250 SUPER DUTY. AFTER HITTING A SMALL DIP IN THE ROAD, MY
28	STEERING COLUMN SHOOK VIOLENTLY, BACK AND FORTH. I WAS TRAVELING ONLY 30 MI PER HOUR. <u>TOOK TO MY DEALER AND THEY SAID NOTHING WAS WRONG.</u> PROBABLY COULD BE MY TIRES. BOUGHT NEW TIRES AND A COUPLE OF WEEKS -201-
	Class Action Complaint
	Case No.

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1 2 3 4	LATER,, THE SAME THING HAPPENED AGAIN. IF I WAS TRAVELING ANY FASTER, I TRULY BELIEVE I WOULD HAVE LOST CONTROL. I HAVE BEEN DRIVING FIRE APPARATUS FOR OVER 29 YEARS. AND I KNOW SOMETHING IS WRONG HERE. PLEASE DO SOMETHING BEFORE SOMEONE IS SERIOUSLY HURT OR KILLED. I DO NOT TRUST FORD. *TR <b>1 Affected Product</b>
5	
6	May 28, 2010 NHTSA ID NUMBER: 10332685
7	Components: STEERING NHTSA ID Number: 10332685
8	Incident Date April 23, 2010
9	Consumer Location LEBANON, PA Vehicle Identification Number 1FPFW21525E****
	Summary of Complaint
10	CRASHNo
11	FIRENo INJURIESO
12	DEATHSO
13	TL*THE CONTACT OWNS A 2005 FORD F250 SUPER DUTY. THE CONTACT STATED THAT
14	WHILE DRIVING AT ANY SPEED OVER 50 MPH, THE ENTIRE VEHICLE WOULD SHAKE VIOLENTLY FROM SIDE TO SIDE WHICH CAUSED CONTAINERS TO FALL OUT OF THE
	CUP HOLDER. WHENEVER THE CONTACT SHUT THE VEHICLE OFF AND BACK ON, IT
15	BEGAN FUNCTIONING NORMALLY UNTIL HE DROVE OVER ANOTHER BUMP IN THE ROAD. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER BUT THE DEALER
16	STATED THAT THEY WERE UNABLE TO DIAGNOSE THE FAILURE. THE FAILURE
17	MILEAGE WAS APPROXIMATELY 60,000. THE CURRENT MILEAGE WAS APPROXIMATELY
18	66,500. UPDATED 11/03/10. *LJ 1 Affected Product
19	
	Land 12, 2000 NUTSA ID NUNIDED, 10272719
20	June 13, 2009 NHTSA ID NUMBER: 10273718 Components: SUSPENSION, STEERING
21	NHTSA ID Number: 10273718
22	Incident Date June 13, 2009 Consumer Location WEST PITTSTON, PA
23	Vehicle Identification Number 1FTNF21535E****
24	Summary of Complaint
25	CRASHNo FIRENo
	INJURIES0
26	DEATHSO
27	I EXPERIENCED A SEVERE AND VIOLENT SHAKING OF THE FRONT END OF MY 2005 FORD F-250 TRUCK WHILE TRAVELING 60 MPH OVER A SLIGHT ROUGH PATCH ON A
28	HIGHWAY. I LOST CONTROL OF MY VEHICLE AND WAS FORCED TO SWERVE OFF THE
	HIGHWAY. I WAS ALMOST HIT BY THE VEHICLE DIRECTLY BEHIND ME. THIS IS THE
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1 2 3 4 5 6	THIRD TIME I HAVE LOST CONTROL OF THE TRUCK BECAUSE OF THIS VIOLENT SHAKING IN THE LAST MONTH. I HAVE HAD THE TRUCK TO A LOCAL INSPECTION STATION AND THEY REPLACED THE STEERING STABILIZER AND DID AN ALIGNMENT. THIS DID NOT HELP. <u>I HAVE CALLED THE FORD DEALER I PURCHASED THE TRUCK</u> <u>FROM AND THEY SAID THEY NEVER HEARD OF ANYONE HAVING THIS PROBLEM</u> <u>WITH ANY FORD TRUCK.</u> OBVIOUSLY, THEY ARE AWARE OF THE PROBLEM. I ONLY HOPE THERE IS A RECALL BEFORE TOO MANY PEOPLE DIE. *TR 1 Affected Product
7 8 9	October 12, 2011 NHTSA ID NUMBER: 10429550 Components: SUSPENSION NHTSA ID Number: 10429550 Incident Date October 8, 2011 Consumer Location TWINSBURG, OH
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> </ol>	Vehicle Identification Number 1FTSX21555E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0
<ol> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> </ol>	MY FORD F250 HAS A VERY DANGEROUS WOBBLE WHEN I HIT A BUMP ON THE HIGHWAY. I HAVE CHECKED THE TIRE PRESSURE AND ALL FOUR TIRES ARE FINE. AFTER DOING SOME RESEARCH I HAD FOUND THAT THIS IS A ON GOING PROBLEM WITH THE FORD SD TRUCKS. SOMETHING HAS TO BE DONE OR SOMEONE IS GOING TO GET KILLED DUE TO A BAD ACCIDENT. <b>EVERY DEALER THAT I TALK TO HAS NEVER</b> <b>HEARD OF THIS PROBLEM BUT YET I SEE IT POSTED ALL OVER THE INTERNET.</b> I AM VERY UPSET AND I AM GOING TO TAKE LEGAL ACTION. *KB <b>1 Affected Product</b>
20	September 1, 2009 NHTSA ID NUMBER: 10282585
21	Components: STEERING NHTSA ID Number: 10282585
22	Incident Date June 5, 2009
23	Consumer Location MEDFORD, MA Vehicle Identification Number N/A
24	Summary of Complaint CRASHNo
25	FIRENo
26	INJURIES0 DEATHS0
27	TL*THE CONTACT OWNS A 2005 FORD F250. WHILE DRIVING APPROXIMATELY 65 MPH DRIVING OVER A SMALL ROAD BUMP; THERE WAS A VIOLENT SHAKE AND VIBRATION.
28	UNEXPECTEDLY, THE VEHICLE LOSS CONTROL FOR APPROXIMATELY 6-8 SECONDS. THERE WAS A SUDDEN RELEASE OF THE ACCELERATOR PEDAL; HOWEVER, THE
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1 2 3 4 5 6	DRIVER WAS ABLE TO GAIN CONTROL OF THE VEHICLE AND RESUME OPERATION. THE FAILURE RECURRED AT VARIOUS SPEEDS. <u>THE VEHICLE WAS TAKEN TO AN</u> <u>AUTHORIZED DEALER FOR INSPECTION; HOWEVER, THE TECHNICIAN WAS</u> <u>UNABLE TO DUPLICATE THE FAILURE. THE VEHICLE WAS TAKEN TO AN</u> <u>AUTHORIZED DEALER ON FOUR SEPARATE OCCASIONS FOR THE IDENTICAL</u> <u>FAILURES WHICH THERE WERE NO RESOLUTIONS.</u> THE CONTACT HAD CONCERNS OF THE SAFETY RISK INVOLVED. THE VIN WAS UNAVAILABLE. THE FAILURE MILEAGE WAS 200. THE CURRENT MILEAGE WAS 47,000. 1 Affected Product
7 8 9 10 11 12 13 14 15 16 17 18 19	September 23, 2010 NHTSA ID NUMBER: 10357223 Components: STEERING NHTSA ID Number: 10357223 Incident Date May 11, 2010 Consumer Location DELEVAN, NY Vehicle Identification Number 1FTSX215X5E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F-250. THE CONTACT STATED THAT THE FRONT STARTED SHAKING BETWEEN 55 AND 65 MPH. THE VEHICLE WAS SHAKING EXCESSIVELY THEREFORE; THE SPEED WOULD NOT INCREASE. THE VEHICLE WAS NOT INSPECTED. THE VEHICLE WOULD ALSO SHAKE EXCESSIVELY WHILE DRIVING OVER A BUMP IN THE ROAD. <u>THE DEALER STATED THAT THEY HAD NOT HEARD OF THE</u> FAILURE AND THAT THE WARRANTY EXPIRED. THE FAILURE MILEAGE WAS 45000 AND THE CURRENT MILEAGE 50000. 1 Affected Product
<ol> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	May 2, 2011 NHTSA ID NUMBER: 10398511 Components: STEERING NHTSA ID Number: 10398511 Incident Date April 30, 2011 Consumer Location OWOSSO, MI Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F-250. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 55 MPH WHEN THE STEERING WHEEL SUDDENLY VEERED TO THE RIGHT. AS HE CORRECTED THE STEERING WHEEL IT VEERED TO THE LEFT -204- Class Action Complaint Case No.

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1 2 3 4	SENDING HIM ACROSS TWO LANES OF TRAFFIC AND DROVE INTO THE MEDIAN. <u>THE</u> <u>VEHICLE WAS TAKEN TO A DEALER WHO ADVISED HIM THAT THEY WERE UNABLE</u> <u>TO DIAGNOSE THE FAILURE.</u> THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT CONTACTED. THE FAILURE MILEAGE WAS APPROXIMATELY 68,000. THE VIN WAS UNAVAILABLE. 1 Affected Product
5	
6	December 9, 2011 NHTSA ID NUMBER: 10439148 Components: STEERING
7	NHTSA ID Number: 10439148
8	Incident Date January 1, 2010
9	Consumer Location BROKEN ARROW, OK Vehicle Identification Number 1FTSX21P65E****
-	Summary of Complaint
10	CRASHNo FIRENo
11	INJURIES0
12	DEATHSO
13	TL* THE CONTACT OWNS A 2005 FORD F-250. THE CONTACT STATED THAT WHEN WHILE
	DRIVING OVER A ROAD BUMP, THE VEHICLE WOULD JERK VIOLENTLY. <u>THE VEHICLE</u> WAS TAKEN TO THE DEALER WHO WAS UNABLE TO DIAGNOSE THE FAILURE. THE
14	VEHICLE WAS THEN TAKEN TO A LOCAL MECHANIC WHO DIAGNOSED THE FAILURE. THE
15	VEHICLE NEEDED TO HAVE A CAMBER ALIGNMENT PERFORMED. <u>THE</u>
16	MANUFACTURER WAS MADE AWARE OF THE FAILURE WHO DID NOT OFFER ANY ASSISTANCE. THE VEHICLE WAS REPAIRED. THE FAILURE MILEAGE WAS 50,000 AND
17	THE CURRENT MILEAGE WAS 91,000. UPDATED 02/27/12 *BF
	1 Affected Product
18	1 Associated Document
19	
20	April 3, 2006 NHTSA ID NUMBER: 10154404
21	Components: SUSPENSION
	NHTSA ID Number: 10154404
22	Incident Date April 3, 2006 Consumer Location BLOOMFIELD, NJ
23	Vehicle Identification Number 1FTWF315X5E****
24	Summary of Complaint CRASHNo
25	FIRENo
26	INJURIES0 DEATHS0
	<b>DEATHS0</b> DT*: THE CONTACT STATED WHILE THE VEHICLE HITS A BUMP, TRAVELING AT LEAST
27	65 MPH, THE FRONT END VIBRATES. THE DEALERSHIP DETERMINED THIS WAS
28	NORMAL OPERATING CONDITIONS DUE TO THE SIZE OF THE VEHICLE.
	1 Affected Product
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1	
2	July 21, 2008 NHTSA ID NUMBER: 10235160
3	Components: SUSPENSION NHTSA ID Number: 10235160
4	Incident Date January 10, 2006
5	Consumer Location SAN DIEGO, CA
5	Vehicle Identification Number 1FTWW31585E****
6	Summary of Complaint
7	CRASHNo FIRENo
8	INJURIES0
0	DEATHS0
9	TL*THE CONTACT OWNS A 2005 FORD F-350 SUPERDUTY. WHILE DRIVING 55 MPH AND
10	HIGHER, THE FRONT END OF THE VEHICLE SHAKES VIOLENTLY AND BECOMES UNCONTROLLABLE. <b>THE DEALER COULD NOT DUPLICATE THE FAILURE.</b> THE
11	CURRENT MILEAGE WAS 20,049 AND FAILURE MILEAGE WAS 500.
12	1 Affected Product
13	February 23, 2009 NHTSA ID NUMBER: 10259663
14	Components: SUSPENSION, STEERING
15	NHTSA ID Number: 10259663
	Incident Date February 22, 2009 Consumer Location CANTON, CT
16	Vehicle Identification Number N/A
17	Summary of Complaint
18	CRASHNo
	FIRENO
19	INJURIES0 DEATHS0
20	2005 FORD F-350 SUPER DUTY. WHEN DRIVING AT HIGHWAY SPEEDS AND CROSSING
21	ROUGH BRIDGE ABUTMENTS OR OTHER UNEVEN SURFACES, WHOLE TRUCK BEGINS TO
	SHAKE UNCONTROLLABLY AND SOMETIMES LASTS FOR SEVERAL MINUTES BEFORE SETTLING DOWN. THIS IS A SEVER PROBLEM AS I'M UNABLE TO STEER OR CONTROL
22	THE TRUCK. I'VE COMPLAINED SEVERAL TIMES TO MY DEALER AND THEY SAY
23	THERE'S NOTHING WRONG WITH THE TRUCK. I DISAGREE AND BELIEVE THIS IS A
24	REAL SAFETY HAZARD. *TR
	1 Affected Product
25	
26	April 17, 2009 NHTSA ID NUMBER: 10265894
27	Components: SUSPENSION NHTSA ID Number: 10265894
28	Incident Date March 1, 2009
_0	Consumer Location PORT GAMBLE, WA
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¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.207 Page 207 of 353
1	Vehicle Identification Number 1FTWW31Y25E****
2	Summary of Complaint CRASHNo
3	FIRENo
4	INJURIES0 DEATHS0
5	1. IF I DRIVE OVER A BUMP IN THE ROAD AT 50MPH OR FASTER. 2. FRONT END SHIMMY.
6	THE FRONT OF MY TRUCK SHAKES VIOLENTLY AND THE BRAKES HARDLY WORK TO GET THE TRUCK SLOWED DOWN. THE SHAKING IS SO VIOLENT THAT I LOSE CONTROL
7	OF THE TRUCK. IT HAS SHAKEN MY TRUCK SO VIOLENTLY THAT IT HAS DAMAGED MY
8	TRUCK. I HAVE HAD IT HAPPEN ABOUT 12 - 15 TIMES. I CAN'T DRIVE OVER 50MPH OR IT STILL HAPPENS. I HAVE ALMOST CAUSED 3 ACCIDENTS AS A RESULT OF THIS
9	HAPPENING. IT HAPPENED ONCE WITH MY WIFE DRIVING WITH OUR KIDS AND SHE WENT OVER THE CENTERLINE AND ALMOST HIT A SEMI HEAD ON. 3. <u>I HAVE TAKEN</u>
10	THE TRUCK TO THE DEALERSHIP TO GET REPAIRED AND THEY TELL ME NOTHING
10 11	<b>IS WRONG WITH MY TRUCK.</b> I PURCHASED THE TRUCK NEW IN 2005 AND IT FIRST STARTED HAPPENING AT 10,000 MILES. TRUCK CURRENTLY HAS 34,000 MILES AND THE
11	PROBLEM IS STILL HAPPENING. I CALLED FORD CUSTOMER CARE TODAY BECAUSE I RECEIVED A LETTER FROM THEM ABOUT THE PROBLEM. THEY TOLD ME THAT THEY
13	DOCUMENTED THE PROBLEM, BUT BECAUSE THE TRUCK IS OUT OF WARRANTY I
	WOULD HAVE TO PAY FOR IT TO BE FIXED. IT SHOULD BE NOTED THAT I STARTED TAKING MY TRUCK INTO THE FORD DEALERSHIP BACK IN 2006 TO HAVE THIS
14	PROBLEM ADDRESSED. I HAVE ASKED FORD TO LOOK INTO THIS PROBLEM MAYBE 4
15	OR 5 TIMES BEFORE I GOT THIS LETTER. I ALSO DID A GOOGLE SEARCH TODAY ABOUT
16	THIS PROBLEM AND YOU CAN SEE THAT MANY PEOPLE POST ONLINE ABOUT THIS VERY PROBLEM. HOPE THIS BECOMES A RECALL SO I CAN KEEP ME AND MY FAMILY
17	SAFE. THANK YOU. *TR
	1 Affected Product
18	
19	September 5, 2008 NHTSA ID NUMBER: 10241025
20	Components: STEERING
21	NHTSA ID Number: 10241025
	Incident Date April 19, 2008 Consumer Location ALGONQUIN, IL
22	Vehicle Identification Number 1FTWW31PX5E****
23	Summary of Complaint
24	CRASHNo
	FIRENo INJURIESO
25	DEATHS0
26	TL*THE CONTACT OWNS A 2005 FORD F-350 SUPERDUTY. THE CONTACT STATED THAT THE STEERING WHEEL SHOOK SO VIOLENTLY THAT HE LOST CONTROL. WHILE
27	DRIVING 65 MPH, HE WAS INCAPABLE OF CONTROLLING THE STEERING. IT WOULD
28	MOVE FROM LEFT TO RIGHT AND HE UNSUCCESSFULLY COMPENSATED FOR THE FAILURE. <u>THE VEHICLE WAS TAKEN TO THE DEALER TWICE, BUT THEY COULD</u>
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1 2 3 4	NOT DUPLICATE THE FAILURE. THE DEALER STATED THAT NOTHING WAS WRONG WITH THE VEHICLE. THE MANUFACTURER HAS NOT BEEN NOTIFIED. THE CURRENT MILEAGE WAS APPROXIMATELY 95,000 AND FAILURE MILEAGE WAS APPROXIMATELY 93,000. 1 Affected Product
5 6	July 27, 2008 NHTSA ID NUMBER: 10235894 Components: SUSPENSION NHTSA ID Number: 10235894
7 8 9	Incident Date October 5, 2006 Consumer Location SANTA CLARITA, CA Vehicle Identification Number 1FTWW33P55E**** Summary of Complaint
10	CRASHNo FIRENo
11	INJURIES0 DEATHS0
12	I HAVE A 2005 FORD F-350 4X4 DIESEL DUALLY TRUCK. SOON AFTER I BOUGHT THE TRUCK I EXPERIENCED A ROUGH SHIMMY IN THE FRONT END. WHEN I GO OVER BUMPS
13	ON THE FREEWAY OR CITY STREETS THE FRONT END SHIMMY'S OUT OF CONTROL. <u>THE</u> TRUCK HAS BEEN TO THE DEALER ON SEVERAL OCCASIONS AND THEY HAVE
14	TOLD ME THAT NOTHING IS WRONG. THIS IS NOT MY FIRST FULL SIZE TRUCK AND
15 16	THIS IS THE FIRST ONE THAT ACTS LIKE THIS. SEVERAL TIMES IT HAS SENT ME INTO THE LANES BESIDE ME. I ALSO TOW A FIFTH WHEEL TRAILER AND IT AMPLIFIES THE
17	PROBLEM. THIS PROBLEM OCCURS EVERY TIME I DRIVE THE VEHICLE AND FORD IN NOT RESPONSIVE TO THE PROBLEM. *TR
18	1 Affected Product
19	January 10, 2011 NHTSA ID NUMBER: 10377298
20	Components: SUSPENSION, STEERING NHTSA ID Number: 10377298
21	Incident Date September 30, 2005
22	Consumer Location ANDOVER, NJ Vehicle Identification Number 1FTWX31P25E****
23	Summary of Complaint CRASHNo
24	FIRENo
25	INJURIES0 DEATHS0
26	WHEN I'M DRIVING AT SPEEDS OF 65 TO 70 AND GO OVER A BUMP IN ROAD THE
27	STEERING WHEEL SHAKES OUT OF CONTROL. <u>I HAD BROUGHT IT BACK TO DEALER</u> TO HAVE SERVICED AND THEY TOLD ME ''THERE IS NO PROBLEM, THAT'S WHAT
28	YOU GET FROM A HEAVY DUTY TRUCK." WHAT A LOAD OF CRAP! I HAVE PAPER WORK DOCUMENTING THE TRUCK WENT TO DEALER FOR STEERING OUT OF CONTROL.
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1 2 3	SINCE THEN THE SHAKING HAS CAUSED ME TO REPLACE BALL JOINTS AND OTHER PARTS TRYING TO STOP THE PROBLEM. THIS SHOULDN'T HAPPEN ON NEW VEHICLE, MUCH LESS ONE THAT COSTS \$45.000. THIS REALLY MAKES ME MAD. 1 Affected Product
4	
5	September 18, 2009 NHTSA ID NUMBER: 10284483 Components: STEERING
6	NHTSA ID Number: 10284483
7	Incident Date September 12, 2009 Consumer Location DURANT, OK
8	Vehicle Identification Number 1FTWW33P65E****
	Summary of Complaint
9	CRASHYes FIRENo
10	INJURIES0
11	DEATHS0
12	I HAVE A FORD F350 HEAVY DUTY 1 TON, I HAD EXPERIENCED ON SEPARATE OCCASIONS WHEN TRAVELING WITH SPEED AROUND 50-65 MPH, IF A BUMP (SLIGHT)
	DIP OR ANY SLIGHT VARIANCE IN ROAD MY TRUCK WILL BEGIN A VIOLENT SHAKE. I
13	HAD RECEIVED THE RECALL NOTICE OF IMPROPER AIR PRESSURE AND CAUSE AND
14	EFFECT. I HAVE HAD MY TIRE PRESSURE CHECKED ON NUMEROUS OCCASIONS, <u>I HAVE</u> ALSO HAD TAKEN MY TRUCK TO LOCAL DEALERSHIP TO CHECK FRONT
15	SUSPENSION, NOTHING FOUND TO BE WRONG WITH FRONT END. (SUSPENSION). ON
16	SEPT. 12, 09 I WAS TRAVELING ON HWY 199 COMING FROM MADILL, OK (JOB) COMING
	TOWARDS DURANT HAVING EMPLOYEE IN TRUCK (FRONT PASSENGER SEAT) MY TRUCK BEGAN TO VIOLENTLY SHAKE, THROWING MY TRUCK INTO A CONCRETE
17	BRIDGE. I STEERED TRUCK THE BEST I COULD CONSIDERING THE TRUCK WAS
18	UNCONTROLLABLE. THE REAR END OF THE TRUCK CLIMBED OVER THE BRIDGE
19	THROWING THE TRUCK NEARLY ON ITS SIDE LANDING IN ONCOMING TRAFFIC FACING OPPOSITE DIRECTION OF TRAVEL 60FT. AWAY FROM BRIDGE. MY TRUCK APPEARS TO
20	BE TOTALED. I OWE MORE THAN THE VALUE OF THE TRUCK AND NOW. MY EMPLOYEE
	AND MYSELF WERE TREATED TO LOCAL HOSPITAL I NOW HAVE A HERNIA FROM THE
21	IMPACT OF THE TRUCK INTO THE BRIDGE DUE TO SUSPENSION. I HAD TOLD OFFICER THAT THE TRUCK HAD DONE THIS BEFORE I HAVE RECEIVED A TICKET FOR NOT
22	MAINTAINING SAFE VEHICLE. MY INSURANCE DOES NOT COVER MY PERSONAL
23	INJURIES. I FEEL LIKE FORD HAS NOT OWN UP TO DEFECT OF THE TRUCK SUSPENSION.
24	MAYBE DOT SHOULD INVESTIGATE FORD AGAIN. *TR 1 Affected Product
25	
26	January 6, 2010 NHTSA ID NUMBER: 10298418 Components: STEERING
27	NHTSA ID Number: 10298418
28	Incident Date January 8, 2007
	Consumer Location FERNLEY, NV
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1 2 3 4 5 6 7 8 9 10	Vehicle Identification Number 1FTWW31P95E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT WHILE DRIVING 55 MPH OVER A BUMP, THE FRONT END OF THE VEHICLE WOULD SHAKE VIOLENTLY. <u>THE CONTACT ASKED THE DEALER ABOUT THE FRONT END SHAKE</u> AND THE DEALER STATED THEY'VE NEVER HEARD OF THIS ISSUE. TWO OTHER DEALERS INFORMED THE CONTACT THAT VEHICLE NEEDED TO HAVE THE TIRES REPLACED. THE CONTACT REPLACED THE TIRES AND THE VIOLENT SHAKING STILL OCCURRED WHENEVER THE CONTACT DROVE OVER A BUMP AT HIGHWAY SPEEDS. THE FAILURE MILEAGE WAS 19,000. 1 Affected Product
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> </ol>	July 24, 2008 NHTSA ID NUMBER: 10235638 Components: SUSPENSION, STEERING NHTSA ID Number: 10235638 Incident Date June 18, 2008 Consumer Location BLOWING ROCK, NC
14 15 16 17	Vehicle Identification Number 1FTSX21586E**** Summary of Complaint CRASHNo FIRENo INJURIES0
18 19	<b>DEATHS0</b> I OWN A 2006 F-250 FORD TRUCK. WHILE DRIVING ON THE INTERSTATE THE FRONT END OF THE TRUCK STARTED VIOLENTLY SHAKING. I ALMOST LOST CONTROL AND COULD
20	HAVE BEEN KILLED. THIS HAPPENED YET AGAIN THE VERY SAME DAY. <u>I TOOK MY</u> FORD TRUCK TO THE FORD DEALERSHIP IN BOONE AND WAS TOLD THERE WAS NOTHING WRONG WITH MY TRUCK. THEY CLAIMED IT WAS PROBABLY DUE TO LOW
21 22	AIR PRESSURE IN THE TIRES. AFTER RESEARCHING THIS PROBLEM ON MY OWN I DISCOVERED THAT THIS IS QUITE A COMMON PROBLEM AND MANY MANY FORD TRUCK OWNERS ARE CURIOUS AS TO WHY NOTHING HAS BEEN DONE. AFTER CLEARLY
23 24	TELLING THE FORD DEALERSHIP THAT I WILL NOT ACCEPT MY TRUCK BACK UNTIL IT HAS BEEN FIXED, THEY REVEAL THAT THEY DO HAVE A SERVICE BULLETIN ABOUT
24	THIS PROBLEM AND REVEAL TO ME THAT FORD TOLD THEM TO CHANGE THE AIR PRESSURE IN THESE TRUCKS. THIS DOES NOT CORRECT THIS DANGEROUS AND DOTENTIALLY LIEE THREATENING PROPLEMENTHESE TRUCKS NEED TO BE DECALLED
26	POTENTIALLY LIFE THREATENING PROBLEM! THESE TRUCKS NEED TO BE RECALLED AND HAVE THEIR STEERING DAMPNERS REPLACED! AFTER FIVE DAYS OF ARGUING
27	WITH THE FORD DEALERSHIP I HAVE YET TO GET MY TRUCK BACK. I DEMANDED A LETTER STATING THAT MY FORD TRUCK WOULD BE SAFE AND THAT THEY WOULD BE LIABLE IN THE EVENT OF MY DEATH DUE TO THIS PROBLEM THAT NO ONE WILL TAKE
28	CARE OF! I HAVE YET TO RECEIVE THEIR ANSWER. *TR
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1	1 Affected Product
3	April 29, 2009 NHTSA ID NUMBER: 10267286
	Components: STEERING, SUSPENSION
4	NHTSA ID Number: 10267286
5	Incident Date October 24, 2006 Consumer Location YUBA CITY, CA
6	Vehicle Identification Number 1FTSW21P46E****
7	Summary of Complaint
	CRASHNo FIRENo
8	INJURIES0
9	DEATHS0
10	3-13-09 I TOOK MY FORD F-250 TO THE DEALERSHIP I PURCHASED IT FROM DUE TO A
	SEVERE STEERING WHEEL AND FRONT WHEEL VIBRATIONS. THIS IS CAUSING SEVERE SHIMMY AND LOSS OF CONTROL OF THE VEHICLE AT APPROX 35-39 MPH. THEY
11	CHECKED IT OUT AND TOLD ME THAT I NEEDED TO MAKE SURE MY TIRE PRESSURE IS
12	AT 65 LBS AT ALL TIMES. THEY SAID THEY DIDN'T FIND ANYTHING WRONG OTHER
13	THAN THE TIRE PRESSURE WAS LOW AND IT TOOK CARE OF 85% OF THE SHIMMY.
	THE SHIMMY HAS WORSENED SENSE I LEFT THE DEALERSHIP AND IS NOW SHIMMING VIOLENTLY AT THIS TIME. I'VE SENSE RECEIVED A LETTER ABOUT THIS PROBLEM
14	FROM FORD MOTOR COMPANY AND THEY ARE RESEARCHING THIS COMMON
15	PROBLEM WITH THE F-250 & F-350 MODELS. *TR
16	1 Affected Product
17	
	May 1, 2009 NHTSA ID NUMBER: 10267467
18	Components: SUSPENSION
19	NHTSA ID Number: 10267467
20	Incident Date April 21, 1997 Consumer Location SPRING CREEK, NV
	Vehicle Identification Number 1FTSW21P66E****
21	Summary of Complaint
22	CRASHNo FIRENo
23	INJURIES0
	DEATHS0
24	TL*THE CONTACT OWNS A 2006 FORD F-250. WHILE DRIVING 45 MPH, THE FRONT END
25	OF THE VEHICLE JUMPED UP AND DOWN. IT FELT AS IF THE FRONT TIRE WAS DETACHING FROM THE VEHICLE. THE CONTACT PULLED OVER AND THE WOBBLING
26	DID NOT CEASE UNTIL THE VEHICLE CAME TO A COMPLETE STOP. THE DEALER
27	COULD NOT FIND ANY FAILURES WITH THE VEHICLE. THE FAILURE WAS LABELED
	AS THE DEATH WOBBLE AND HAS OCCURRED ON FIVE OCCASIONS. THE VEHICLE WAS
28	REPAIRED AT THE CONTACT'S EXPENSE. HEAVIER SHOCKS AND A STEERING STABILIZER WERE INSTALLED ON THE VEHICLE. THE CONTACT RECEIVED A LETTER IN
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1 2 3	THE MAIL FROM FORD REGARDING THESE ONGOING FAILURES. THE FAILURE MILEAGE WAS 6,000 AND CURRENT MILEAGE WAS 69,000. 1 Affected Product
4	August 20, 2009 NHTSA ID NUMBER: 10281230
5	Components: SUSPENSION
6	NHTSA ID Number: 10281230 Incident Date May 1, 2009
-	Consumer Location PARAMUS, NJ
7	Vehicle Identification Number N/A
8	Summary of Complaint CRASHNo
9	FIRENO
10	INJURIES0 DEATHS0
11	MY 2006 FORD F250 4WD SUPERDUTY PICKUP SHAKES VIOLENTLY WHENEVER I HIT
12	THE SMALLEST POTHOLE OR DRIVE OVER RAILROAD TRACKS. IT IS A DANGER TO MYSELF, MY CHILDREN AND ANYONE DRIVING AROUND ME ON THE ROAD <b>. TOOK THE</b>
	TRUCK TO MY DEALER AND ALMOST GOT THROWN OUT AFTER GETTING INTO AN
13	ARGUMENT WITH BOTH THE MECHANIC AND SVC MANAGER WHO SAID THERE
14	WAS NOTHING WRONG WITH THE TRUCK, THEY NEVER HEARD OF THIS PROBLEM AND I NEED TO BUY NEW TIRES. TIRES ARE BRAND NEW WITH LESS THAN 20K ON
15	THEM. *TR
16	1 Affected Product
17	
18	April 16, 2010 NHTSA ID NUMBER: 10326010
	Components: SUSPENSION NHTSA ID Number: 10326010
19	Incident Date February 13, 2010
20	Consumer Location YORBA LINDA, CA
21	Vehicle Identification Number 1FTSW21P46E****
22	Summary of Complaint CRASHNo
	FIRENo
23	INJURIES0
24	<b>DEATHS0</b> MY FORD F250 4X4 TRUCK HAS A SEVERE SHIMMY OF THE FRONT WHEELS WHICH CAN
25	OCCUR WHEN DRIVING AROUND 55-60 MILES PER HOUR. IN ORDER TO CALM THE
	SHIMMY OR OSCILLATION, I HAVE TO SLOW DOWN AT LEAST 10 MILES PER HOUR. THIS
26	HAS HAPPENED ON SEVERAL TIMES, BOTH WHEN TOWING A 5TH WHEEL AND WITHOUT THE 5TH WHEEL. HOWEVER, IT IS MORE PRONE TO OCCURRING WHEN
27	DOWNING THE 5TH WHEEL. I TOOK MY TRUCK INTO THE FORD DEALER TO INSPECT
28	THE SUSPENSION AND ADJUST THE TIRE PRESSURE, BUT THEY SAID IT WAS ALL
	<b><u>FINE.</u></b> I HAD AN OCCURRENCE OF THIS SHIMMY WITHIN 3 DAYS FROM TAKING IT FROM
	-212-
	Class Action Complaint Case No.

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1 2 3 4	THE DEALER. I HAVE SEEN THERE HAS BEEN SOME REPORT ON THIS TYPE OF BEHAVIOR, AND FORD HAS STATED IT IS A TIRE INFLATION PROBLEM, BUT AFTER TAKING IT INTO THE FORD DEALER AND THEM CHECKING IT OUT AND THEN IT HAPPENING, I THINK IT IS SOMETHING MORE SERIOUS. *TR 1 Affected Product
5	October 13, 2010 NHTSA ID NUMBER: 10360390
6	Components: STEERING, SUSPENSION
7	NHTSA ID Number: 10360390 Incident Date September 30, 2010
8	Consumer Location WEST POINT, MS Vehicle Identification Number N/A
9	Summary of Complaint
10	CRASHNo FIRENo
11	INJURIES0
	DEATHSO
12	I HAVE A 2006 FORD F-250 SUPER DUTY TRUCK. WHEN I HIT A ROUGH SPOT IN THE ROAD THE FRONT END SHAKES SO BAD YOU HAVE NO CONTROL OF THE STEERING.
13	THE ONLY WAY TO GET IT TO STOP SHAKING IS TO GET ON THE BRAKES AND STOP. <b>I</b>
14	HAVE BEEN BACK TO THE DEALER AND THEY TELL ME THERE IS NOTHING WRONG. SOMEONE IS GOING TO GET KILLED IF THIS IS NOT CORRECTED. *TR
15	1 Affected Product
16	
17	November 27, 2006 NHTSA ID NUMBER: 10174494
18	Components: SUSPENSION NHTSA ID Number: 10174494
19	Incident Date November 20, 2006
20	Consumer Location SAINT JAMES CITY, FL Vehicle Identification Number 1FTSW21596E****
	Summary of Complaint
21	CRASHNo FIRENo
22	INJURIES0
23	DEATHSO
24	VEHICLE SHAKES UNCONTROLLABLY AFTER HITTING A BUMP IN THE ROAD AT HIGHWAY SPEEDS OF 60 TO 75 MPH. VEHICLE MUST BE BROUGHT TO A COMPLETE STOP
25	TO REGAIN CONTROL, THEN RIDES SMOOTHLY. VEHICLE WAS TAKEN TO THE
26	DEALERSHIP TO FIX THE PROBLEM, DEALER STATED THAT THE PROBLEM DID NOT OCCUR DURING A ROAD TEST OF 22 MILES. THE SERVICE ADVISOR STATES
27	THAT NOTHING IS WRONG WITH THE VEHICLE. THIS IS THE FOURTH TIME THIS PROBLEM HAS HAPPENED IN 35000 MILES. DEALER REFUSED TO TEST DRIVE IN A
28	SPECIFIC AREA WERE THE PROBLEM HAS OCCURRED MULTIPLE TIMES. THE TRUCK IS
-	UNSAFE FOR INTERSTATE DRIVING. *JB
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	Case No.

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1	1 Affected Product
3	September 26, 2007 NHTSA ID NUMBER: 10204198
4	Components: SUSPENSION, STEERING NHTSA ID Number: 10204198
5	Incident Date September 26, 2007
6	Consumer Location ALVARADO, TX Vehicle Identification Number 1FTSW21P56E****
7	Summary of Complaint
8	CRASHNo FIRENo
-	INJURIES0
9	<b>DEATHS0</b> I OWN A 2006 F250 DIESEL TRUCK THAT SHAKES VIOLENTLY WHEN YOU HIT EVEN THE
10	SMALLEST OF POTHOLES. IT SHAKES SO VIOLENTLY THAT YOU HAVE TO COME TO A
11	COMPLETE STOP, REGAIN CONTROL, AND THEN RESUME DRIVING. THIS IS ESPECIALLY HAZARDOUS ON THE SMALL COUNTY ROADS WE LIVE ON, AND WHEN YOU HAVE TO
12	COME TO A COMPLETE STOP ON THE FREEWAY. <u>WE HAVE TRIED TO GET IT FIXED AT</u>
13	THE DEALERSHIP, WHERE THEY ASSURE US THAT NOTHING IS WRONG WITH THIS DANGEROUS DEATH TRAP. I REFUSE TO ALLOW MY HUSBAND AND MY SON GET INTO
14	A VEHICLE THAT WILL SHAKE VIOLENTLY OUT OF CONTROL INTO ONCOMING TRAFFIC, INTO A DITCH, OR OFF A BRIDGE. I AM ASHAMED THAT FORD WOULD BE
15	AWARE OF THIS ISSUE, AND NOT RECALL THIS PROBLEM VEHICLE AS THERE ARE
16	MANY OTHERS OUT THERE WITH THE SAME PROBLEM. I AM FURIOUS THAT I SPENT \$48,000 ON A TRUCK THAT HAS 26,000 MILES ON IT AND HAS BEEN IN THE SHOP 3 TIMES
17	TO HAVE THE SAME PROBLEM FIXED, SO IT IS COMPLETELY USELESS TO ME, NOT TO
18	MENTION A DANGER TO MY FAMILY'S WELL BEING. WHAT IS IT GOING TO TAKE FOR FORD TO ADMIT THEIR TRUCKS ARE A HAZARD? HOW MANY PEOPLE ARE GOING TO
19	HAVE TO DIE OR BE SEVERELY INJURED BEFORE THEY ADDRESS THIS PRESSING ISSUE??? *TR
20	1 Affected Product
21	
22	November 7, 2008 NHTSA ID NUMBER: 10247920
23	Components: SUSPENSION NHTSA ID Number: 10247920
24	Incident Date October 28, 2008
25	Consumer Location SELBYVILLE, DE Vehicle Identification Number 1FTSW21516E****
26	Summary of Complaint CRASHNo
27	FIRENo
28	INJURIES0 DEATHS0
20	
	-214- Class Action Complaint
	Case No.

<ul> <li>AFTER THE LAST INCIDENT ON 8/2/2006, I HAD THE VEHICLE TOWED TO MY LOCAL</li> <li>FORD DEALER ON 8/5/2006. THIS WAS NOW THE SECOND TIME VEHICLE WAS BROUGH</li> <li>INTO A FORD DEALERSHIP FOR THIS PROBLEM. <u>THE FIRST DEALERSHIP REQUIRED</u></li> <li><b>THAT I REPRODUCE THIS PROBLEM FOR THE TECH WORKING ON THE VEHICLE.</b></li> <li>WAS TOLD EVERYTHING WAS FINE WITH THE VEHICLE. THIS SECOND DEALERSHI</li> <li>HAD MY TRUCK UNTIL 8/11/2006 AND SAID THE PROBLEM HAD BEEN CORRECTED. I</li> <li>WAS TOLD SOME METAL BUSHINGS WERE REPLACED IN THE FRONT END AND THAT</li> <li>CHAMBER OR CASTER WAS WAY OFF. I WAS ALSO TOLD TO MAKE SURE AND ROTAT</li> <li>TIRES AT SUGGESTED INTERVALS AND TO KEEP TIRES PROPERLY INFLATED. I NOTIC</li> <li>WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLD</li> <li>THAT IT WAS FROM THE TIRE WEAR. THE ODOMETER READING AT THAT TIME WAS</li> <li>22065. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK</li> <li>TO THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE</li> <li>TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE A</li> <li>THE TIRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND</li> <li>DEALERSHIP. THE VEHICLE CONTINUES TO HAVE A CHOPPY BOUNCE II THE RIDE,</li> <li>WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAV</li> <li>RODE THAT WAY WHEN I PURCHASED IT, I WOULD HAVE NEVER PURCHASED IT. I</li> <li>WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASION HAD A SEVERE</li> </ul>	C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.215 Page 215 of 353
2       WITH VIOLENT FRONT END OSCILLATION. SEE ODL RESUME INVESTIGATION EA 08-00         3       AFTER THE LAST INCIDENT ON 8/2/2006. I HAD THE VEHICLE TOWED TO MY LOCAL         4       HATER THE LAST INCIDENT ON 8/2/2006. I HAD THE VEHICLE TOWED TO MY LOCAL         5       INTO A FORD DEALER ON 8/5/2006. THIS WAS NOW THE SECOND TIME VEHICLE.         6       WASTOLD EVERYTHING WAS FINE WITH THE VEHICLE. THIS SECOND DEALERSH         7       INTER AND TO LEVERYTHING WAS FINE WITH THE VEHICLE.         8       WASTOLD SOME METAL BUSINIGS WERE REPLACED IN THE FRONT END AND THAT         9       CHAMBER OR CASTER WAS WAY OFF. I WAS ALSO TOLD TO MAKE SURE AND ROTAT         10       WASTOLD SOME METAL BUSINIGS WERE REPLACED IN THE FRONT END AND THAT         11       CHAMBER OR CASTER WAS WAY OFF. I WAS ALSO TOLD TO MAKE SURE AND ROTAT         11       WASTOLD SOME METAL BUSINIGS WERE REPLACED IN THE FRONT END AND WAS TOLD         11       THEY THE VALUEK HAD A CHOPPY BOUNCE TO THE RED. I NOTIC         12       WORD THE THE TRUCK HAD A CHOPPY BOUNCE THE TRUCK BACK         11       THEY THE REPLANCED ALL 4 TIRES AND REINDEXED THE REART THES STHEST AND         12       WHICH NUMER BUSINGALLY ON THE FRONT AND ROTATED AT THE SECOND         14       THEURESTHAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND         15       WHICH NUMER STOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOLD HA'NODE OFTAL	1	LUAVE A 2004 FORD F250 AVA CREWCAR WITH A SHORTRED THAT HAD BRODI EMS
<ul> <li>FORD TELEAST INCLOSE TO A SOURCE THIS WAS NOW THE SECOND TIME VEHICLE WAS BROUGH INTO A FORD DEALER ON 8/5/2006. THIS WAS NOW THE SECOND TIME VEHICLE WAS BROUGH INTO A FORD DEALERSHIP FOR THIS PROBLEM FOR THE TECH WORKING ON THE VEHICLE.</li> <li>WAS TOLD EVERYTHING WAS FINE WITH THE VEHICLE. THIS SECOND DEALERSH HAD MY TRUCK UNTIL 8/11/2006 AND SAID THE PROBLEM HAD BEEN CORRECTED. 1</li> <li>WAS TOLD SOME METAL BUSINGS WERE REPLACED IN THE FRONT END AND THAT CHAMBER OR CASTER WAS WAY OFF. I WAS ALSO TOLD TO MAKE SURE AND ROTHAT TIRES AT SUGGESTED INTERVALS AND TO KEEP TIRES PROPERLY INFLATED. INOTIC WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLJ THAT IT WAS FROM THE TIRE WEAR. THE ODOMETER READING AT THAT TIME WAS 2006. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK TO THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE A THE TRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND DEALERSHIP. THE VEHICLE CONTINUES TO HAVE A CHOPPY BOUNCE II THE RIDE, WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAT RODE THAT WAY WIEN I PURCHASED IT, I WOULD HAVE REVER PURCHASED TI. 1</li> <li>WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASION HAD A SEVERE OSCILLATION IN THE FRONT END AT HIGHWAY SPEEDS 65 AND HIGHER, TO ONE THA BOUNCES ALL THE TIME. THE BOUNCE IN THE RIDE WAS NOTICEABLE TO A FRIEND WHO OWNS A 2005 F250, THAT HAS HAD NONE OF THESE PROBLEMS, ALTHOUGH OTHERS HAVE WITH THAT YEAR ALSO. TURNING TO FORD IN THIS MATTER HAS PROVED POINTLESS IN THEIR WILLINGNESS TO ADMIT A PROBLEM WITH THIS VEHICL OR THEIR ON NEGILEERING FLAWS. I AM CURRENTLY TRYING TO HAVE AN ENGINEER FROM FORD LOOK AT THIS VEHICLE. *TR 1 Affected Product</li> </ul>	_	WITH VIOLENT FRONT END OSCILLATION. SEE ODI RESUME INVESTIGATION EA 08-007.
INTO A FORD DEALERSHIP FOR THIS PROBLEM. THE FIRST DEALERSHIP REQUIRED         INTO A FORD DEALERSHIP FOR THIS PROBLEM FOR THE TECH WORKING ON THE VEHICLE         WAS TOLD EVERYTHING WAS FINE WITH THE VEWICLE. THIS SECOND DEALERSH         HAD MY TRUCK UNTIL, 8/11/2006 AND SAID THE PROBLEM HAD BEEN CORRECTED. I         WAS TOLD SOME METAL BUSHINGS WERE REPLACED IN THE FRONT END AND THAT         CHAMBER OR CASTER WAS WAY OFF. I WAS ALSO TOLD TO MAKE SURE AND ROTAT         TIRES AT SUGGESTED INTERVALS AND TO KEEP TRES PROPERLY INFLATED. I NOTIC         WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLD         THAT IT WAS FROM THE TIRE WEAR. THE ODOMETER READING AT THAT TIME WAS         22065. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK         TO THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE         TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE A         THE TIRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND         DEALERSHIP, THE VEHICLE CONTINUES TO HAVE A CHOPPY BOUNCE II THE RIDE,         WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAY         RODE THAT WAY WHEN I PURCHASED IT, I WOULD HAYE NEVER PURCHASED IT. I         WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAY         RODE THAT WAY WHEN I PURCHASED IT, I WOULD HAYE NEVER PURCHASED IT. I         WENT FROM HAVING A SMOOTH RIDING TO FORD IN THIS MATTER HAS         POVED DONTLESS IN THE RENDER T		,
4       THAT I REPRODUCE THIS PROBLEM FOR THE TECH WORKING ON THE VEHICLE.         5       WAS TOLD EVERYTHING WAS FINE WITH THE VEHICLE. THIS SECOND DEALERSH         6       WAS TOLD SOME METAL BUSHINGS WERE REPLACED IN THE FRONT END AND THAT.         7       TIRES AT SUGGESTED INTERVALS MAY OFF. I WAS ALSO TOLD TO MAKE SURE AND WAS TOLD.         8       WAS TOLD SOME METAL BUSHINGS WERE REPLACED IN THE FRONT END AND THAT.         7       TIRES AT SUGGESTED INTERVALS AND TO KEEP TIRES PROPERLY INFLATED. INOTIC         8       WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLD.         10       THAT TI WAS FROM THE TIRE WEAR. THE ODOMETER READING AT THAT TIME WAS.         9       22065. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK         10       THAT THE SEBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE A         11       THE TRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND         12       WHICH NOW I VAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAY         13       WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASION HAD A SEVERE         14       BOUNCES ALL THE TIME. THE BOUNCE IN THE RIDE WAS NOTICEABLE TO A FRIEND         15       WHON IN NEE FRONT END AT HIGHWAY SPEEDS 65 AND HIGHER, TO ONE THA         16       PROVED POINTLESS IN THEIR WILLINGRESS TO ADMIT A PROBLEM, ALT HAS HAD         17       WENT FROM HAVING A SMOOTH RIDING TRUCK	3	
5       HAD MY TRUCK UNTIL 8/11/2006 AND SAID THE PROBLEM HAD BEEN CORRECTED. I         6       WAS TOLD SOME METAL BUSHINGS WERE REPLACED IN THE FRONT END AND THAT CHAMBER OR CASTER WAS WAY OFF. I WAS ALSO TOLD TO MAKE SURE AND ROTAT         7       TIRES AT SUGGESTED INTERVALS AND TO KEEP TIRES PROPERLY INFLATED. I NOTIC         8       WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLD         9       22065. AFTER DRIVING THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND THME WAS         9       22065. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK         10       THAT TI WAS FROM THE TIRE WEAR. THE DONMETER READING AT THAT TIME WAS         11       THE DEALARCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE AND         12       THE TIRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND         13       THE TRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND         14       THE TIRES THAT WERE ON THO NAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAY         15       WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAY         16       WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASHLE TO A FRIEND         17       ROBE THAT WAY WHEN I PURCHASED IT, I WOULD HAVE NEVER PURCHASED IT. I         18       WONT FROM HAVING A SMOOTH RED TO THE RIDE WAS NOTICEABLE TO A FRIEND         14       BOUNCES ALL THE TIME. THE BOUNCE IN THE RIDE WAS NOTICEABLE TO A FRIEND	4	THAT I REPRODUCE THIS PROBLEM FOR THE TECH WORKING ON THE VEHICLE. I
6       WAS TOLD SOME METAL BUSHINGS WERE REPLACED IN THE FRONT END AND THAT CHAMBER OR CASTER WAS WAY OFF. IWAS ALSO TOLD TO MAKE SURE AND ROTAT TIRES AT SUGGESTED INTERVALS AND TO KEEP TIRES PROPERLY INFLATED. INOTIC WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLJ WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLJ THAT IT WAS PROM THE TIRE WEAR. THE ODOMETER READING AT THAT TIME WAS 2006S. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK TO THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THATS THAT TRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND DEALERSHIP. THE VEHICLE CONTINUES TO HAVE A CHOPPY BOUNCE II THE RIDE, WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAV RODE THAT WAY WHEN I PURCHASED IT, I WOULD HAVE NEVER PURCHASED IT. I WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASION HAD A SEVERE OSCILLATION IN THE FRONT END AT HIGHWAY SPEEDS 65 AND HIGHER, TO ONE THA BOUNCES ALL THE TIME. THE BOUNCE IN THE RIDE WAS NOTICEABLE TO A FRIEND WHO OWNS A 2005 P250, THAT HAS HAD NONE OF THESE PROBLEMS, ALTHOUGH OTHERS HAVE WITH THAT YEAR ALSO. TURNING TO FORD IN THIS MATTER HAS PROVED POINTLESS IN THEIR WILLINGNESS TO ADMIT A PROBLEM WITH THIS VEHICL OR THEIR OWN ENGINEERING FLAWS. I AM CURRENTLY TRYING TO HAVE AN ENGINEER FROM FORD LOOK AT THIS VEHICLE. *TR 1 Affected Product         19         20         20         20         20         20         20         20         20         20         21         20         21         22	5	
<ul> <li>TIRES AT SUGGESTED INTERVALS AND TO KEEP TIRES PROPERLY INFLATED. INOTIC</li> <li>WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLI</li> <li>THAT TI WAS FROM THE TRUE WEAR. THE ODOMETER READING AT THAT TIME WAS</li> <li>22065. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK</li> <li>TO THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE</li> <li>TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE A</li> <li>THE TIRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND</li> <li>DEALERSHIP. THE VEHICLE CONTINUES TO HAVE A CHOPPY BOUNCE II THE RIDE.</li> <li>WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAV</li> <li>RODE THAT WAY WHEN I PURCHASED IT, I WOULD HAVE NEVER PURCHASED TI. I</li> <li>WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASION HAD A SEVERE</li> <li>OSCILLATION IN THE FRONT END AT HIGHWAY SPEEDS 65 AND HIGHER, TO ONE THA</li> <li>BOUNCES ALL THE TIME. THE BOUNCE IN THE RIDE WAS NOTICEABLE TO A FRIEND</li> <li>WHO OWNS A 2005 F250, THAT HAS HAD NONE OF THESE PROBLEMS, ALTHOUGH</li> <li>OTHERS HAVE WITH THAT YEAR ALSO. TURNING TO FORD IN THIS MATTER HAS</li> <li>PROVED POINTLESS IN THEIR WILLINGNESS TO ADMIT A PROBLEM WITH THIS VEHIC</li> <li>OR THEIR OWN ENGINEERING FLAWS. I AM CURRENTLY TRYING TO HAVE AN</li> <li>ENGINEER FROM FORD LOOK AT THIS VEHICLE. *TR</li> <li>1 Affected Product</li> <li>November 14, 2008 NHTSA ID NUMBER: 10248855</li> <li>Components: SUSPENSION</li> <li>NHTSA ID NUMBER: 10248855</li> <li>Components: SUSPENSION</li> <li>NHTSA ID NUMBER IFTS W21P26E****</li> <li>Summary of Complaint</li> <li>CRASHNO</li> <li>FIRENO</li> <li>INJURIES0</li> <li>DEATTHS0</li> <li>PORCH ASED FROM FORD A BRAND NEW F-250 WHICH IS EXPERIENCING WHAT IS</li> <li>COMMONLY REFERRED TO AS THE "DEATH WOBBLE", ANY INTERNET SEARCH WILL</li> <li>TURN UP THIS SITUATION.</li></ul>	6	WAS TOLD SOME METAL BUSHINGS WERE REPLACED IN THE FRONT END AND THAT
8       WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLL         8       THAT IT WAS FROM THE TIRE WEAR. THE ODOMETER READING AT THAT TINE WAS         9       22065. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK         10       THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE         11       TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE A         12       THE TIRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND         14       DEALERSHIP. THE VEHICLE CONTINUES TO HAVE A CHOPPY BOUNCE II THE RIDE,         12       WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAY         13       WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASION HAD A SEVERE         14       BOUNCES ALL THE TIME. THE BOUNCE IN THE RIDE WAS NOTICEABLE TO A FRIEND         15       WHON FROM HAVING A SMOOTH RIDING TRUCK THAT AN ON COCASION HAD A SEVERE         16       DOWNS A 2005 F250, THAT HAS HAD NONE OF THESE PROBLEMS, ALTHOUGH         17       WENT FROM HAVING A SMOND HALSO, TURNING TO FORD IN THIS MATTER HAS         18       PROVED POINTLESS IN THEIR WILLINGNESS TO ADMIT A PROBLEM WITH THIS VEHIC         19       ONTHER OWN FORD LOOK AT THIS VEHICLE. *TR         19       I Affected Product         19       NHTSA ID NUMBER: 10248855         10       I Affected Identiffication Number 1FTSW21P26E	7	
<ul> <li>THAT IT WAS FROM THE TIRE WEAR. THE ODONE TER READING AT THAT TIME WAS         <ul> <li>22065. AFTER DRIVING THE TRUCK FOR ABOUT 3000 MILES, I TOOK THE TRUCK BACK             TO THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE             TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE A             THE TIRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND             DEALERSHIP. THE VEHICLE CONTINUES TO HAVE A CHOPPY BOUNCE II THE RIDE,             WHICH NOW I WAS TOLD WAS NORMAL OR ACCEPTABLE. IF THE TRUCK WOULD HAY             RODE THAT WAY WHEN I PURCHASED TI, I WOULD HAVE NEVER PURCHASED TI. 1             WENT FROM HAVING A SMOOTH RIDING TRUCK THAT ON OCCASION HAD A SEVERE             OSCILLATION IN THE FRONT END AT HIGHWAY SPEEDS 65 AND HIGHER, TO ONE THA             BOUNCES ALL THE TIME. THE BOUNCE IN THE RIDE WAS NOTICEABLE TO A FRIEND             WHO OWNS A 2005 F250, THAT HAS HAD NONE OF THESE PROBLEMS, ALTHOUGH             OTHERS HAVE WITH THAT YEAR ALSO. TURNING TO FORD IN THIS MATTER HAS             PROVED POINTLESS IN THEIR WILLINGNESS TO ADMIT A PROBLEM WITH THIS VEHIC             OR THEIR OWN ENGINEERING FLAWS. I AM CURRENTLY TRYING TO HAVE AN             ENGINEER FROM FORD LOOK AT THIS VEHICLE. *TR             1 Affected Product         </li> <li>November 14, 2008 NHTSA ID NUMBER: 10248855             Components: SUSPENSION             NHTSA ID NUMBER: 10248855             Components: SUSPENSION             NHTSA ID NUMBER: 175W21P26E****             Summary of Complaint             CRASHNO             FIRENO             INJURES0            DEATHS0             IPURCHASED FROM FORD A BRAND NEW F-250 WHICH IS EXPERIENCING WHAT IS             COMMONLY REFERRED TO AS THE "DEATH WOBBLE", ANY INTERNET SEARCH WILL</li></ul></li></ul>		WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLD
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<ul> <li>I PURCHASED FROM FORD A BRAND NEW F-250 WHICH IS EXPERIENCING WHAT IS COMMONLY REFERRED TO AS THE "DEATH WOBBLE", ANY INTERNET SEARCH WILL TURN UP THIS SITUATION. THE TRUCK FOR SAFETY REASONS AND FEAR OF DEATH HAS BEEN PARKED FOR 1 YEAR. <u>THE TRUCK SHAKES, WOBBLES, VIBRATES, AND</u> -215- Class Action Complaint</li> </ul>	25	
<ul> <li>27</li> <li>28</li> <li>COMMONLY REFERRED TO AS THE "DEATH WOBBLE", ANY INTERNET SEARCH WILL TURN UP THIS SITUATION. THE TRUCK FOR SAFETY REASONS AND FEAR OF DEATH HAS BEEN PARKED FOR 1 YEAR. <u>THE TRUCK SHAKES, WOBBLES, VIBRATES, AND</u> -215-</li> <li>Class Action Complaint</li> </ul>	26	
28 TURN UP THIS SITUATION. THE TRUCK FOR SAFETY REASONS AND FEAR OF DEATH HAS BEEN PARKED FOR 1 YEAR. <u>THE TRUCK SHAKES, WOBBLES, VIBRATES, AND</u> -215- Class Action Complaint	27	
Class Action Complaint	28	TURN UP THIS SITUATION. THE TRUCK FOR SAFETY REASONS AND FEAR OF DEATH
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		Case INU.

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1 2	HOPS VIOLENTLY AT FREEWAY SPEED WITH DEALERSHIPS TREATING THESE CONDITIONS AS MYSTERIOUS OR NON-EXISTENT! *TR 1 Affected Product
3	
4	August 3, 2009 NHTSA ID NUMBER: 10279266
5	Components: SUSPENSION NHTSA ID Number: 10279266
6	Incident Date July 1, 2009
7	Consumer Location PLACERVILLE, CA Vehicle Identification Number 1FTSW21P96E****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0 DEATHS0
11	WITH ONLY 35,000 MILES ON IT, MY 2006 F-250 SD DIESEL TRUCK HAS DEVELOPED A
12	FRIGHTENING BOUNCING IN THE FRONT END. ONCE IT HAPPENED GOING 65 MPH WHEN I HIT A FREEWAY POT HOLE. THE FRONT TIRE BOUNCED UP AND DOWN SO SEVERELY,
13	THAT I PULLED OFF ONTO THE SHOULDER TO SEE IF SOMETHING HAD COME
	UNBOLTED. I HAVE EXPERIENCED THE SAME BOUNCING AT 40 AND 50 MPH FROM HITTING POT HOLES. FORD EVEN SENT ME AN ADVISORY ON THIS PROBLEM, CLAIMING
14	THAT IT WAS RELATED TO INCORRECT TIRE PRESSURE. I HAVE BEEN FANATIC ABOUT
15	TIRE PRESSURE, SO THAT WAS NOT INVOLVED. <u>THE DEALER FOUND NOTHING</u> WRONG WITH THE TRUCK AND CLAIMED THAT A \$375 STEERING STABILIZER KIT
16	WOULD CORRECT THE PROBLEM. WHY SHOULD I PAY FOR CORRECTING FORD'S
17	DESIGN PROBLEMS? I AM JUST CONCERNED THAT THE BOUNCING COULD CAUSE ME TO LOSE CONTROL OF THE VEHICLE. *TR
18	1 Affected Product
19	
20	
21	July 15, 2010 NHTSA ID NUMBER: 10343375 Components: STEERING, SUSPENSION
22	NHTSA ID Number: 10343375
23	Incident Date May 18, 2010 Consumer Location APPLE VALLEY, CA
24	Vehicle Identification Number 1FTSW21P86E****
25	Summary of Complaint CRASHNo
	FIRENo
26	INJURIES0 DEATHS0
27	VIOLENT SHAKING "DEATH WOBBLE" ON A 2006 FORD F-250 SUPER DUTY 4X4 PICKUP
28	TRUCK. THE TRUCK EXPERIENCES A VIOLENT SHAKING IN THE FRONT END AT SPEEDS OF ABOUT 60-65 MPH. THIS HAPPENS WHILE ACCELERATING OR AFTER HITTING A
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1 2 3 4	BUMP IN THE ROAD. IT IS ALMOST IMPOSSIBLE TO CONTROL AND ONLY STOPS WHEN SPEED IS REDUCED. FORD MOTOR COMPANY HAS SENT ME A LETTER NOTIFYING ME OF THIS PROBLEM A YEAR AGO, BUT OFFERS NO FIX FOR THE PROBLEM OTHER THAN A WARNING TO SLOW THE VEHICLE DOWN. <u>LOCAL FORD DEALERSHIP DENIED</u> <u>THERE IS A PROBLEM AND WILL NOT FIX IT.</u> *TR 1 Affected Product
5	
6	June 6, 2012 NHTSA ID NUMBER: 10460739
7	Components: STEERING, SUSPENSION NHTSA ID Number: 10460739
8	Incident Date June 6, 2012
9	Consumer Location FRANKLIN, IN Vehicle Identification Number 1FTSX21516E****
9 10	Summary of Complaint CRASHNo
11	FIRENo
12	INJURIES0 DEATHS0
	I HAVE BEEN HAVING THIS PROBLEM FOR ALMOST A YEAR NOW AND HAVE READ
13	THOUSANDS OF OTHER COMPLAINTS THAT IS THE SAME ISSUE. THIS TRUCK ALL MOST KILLED ME AGAIN TODAY. IT GOES INTO A "DEATH WOBBLE" WHEN YOU HIT A BUMP
14	IF YOU ARE OVER 55MPH. IF YOU ANRT EXPECTING IT TO HAPPEN AND IT IS THE 1ST
15	TIME YOU EXPERIENCE IT YOU WILL WRECK! <b>I HAVE CONTACTED SEVERAL</b>
16	DEALERS AND NO ONE SEEMS TO KNOW ABOUT OR HEARD ABOUT IT BUT THERE IS THOUSANDS OF COMPLAINTS ONLINE AND ALSO HAVE RECEIVED A LETTER FROM
17	FORD STATING TO CHECK TIRE PRESSURES! I HAVE DONE WHAT THEY SAID + HAD NEW SHOCKS, HAD NEW TIRES, STRUTS CHECKED, BALL JOINTS CHECKED, AND REAR
18	SUSPENSION LOOKED AT. NOTHING IS WRONG THIS IS CLEARLY A FACTORY
19	PROBLEM AND IT NEEDS TO BE TAKEN CARE OF BEFORE PEOPLE START DIEING FROM IT! IS FORD GOING TO RAISE MY CHILDREN WHEN THIS MAKES ME WRECK AND DIE
20	NO THEY ARE NOT SO THEY NEED TO GET THIS TAKEN CARE OF. REPORTS SAY THAT
21	THEY HAVE CHANGED THE SET UP ON NEWER HEAVY DUTY TRUCKS BECAUSE OF THIS SO WHY AREN'T THEY TAKING CARE OF THE ONE'S THEY ALREADY SOLD TO THE
22	PUBLIC! PLEASE HELPYOU CAN FIND TONS OF INFO IF YOU SEARCH " DEATH WOBBLE OR DEATH SHAKE! *TR
23	1 Affected Product
24	
25	July 27, 2007 NHTSA ID NUMBER: 10197626
	Components: STEERING
26	NHTSA ID Number: 10197626 Incident Date May 1, 2006
27	Consumer Location AUSTINVILLE, VA
28	Vehicle Identification Number 1FTNF21546E****
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1 2	CRASHNo FIRENo INJURIES0
3	DEATHS0
4	TL*THE CONTACT OWNS A 2006 FORD F-250 SD. WHILE DRIVING 55 MPH OR GREATER, THE FRONT END OF THE VEHICLE VIBRATES WHEN DRIVING OVER A BUMP IN THE
5	ROAD. THE DEALER INSPECTED THE VEHICLE, BUT WERE UNABLE TO DETERMINE THE CAUSE OF FAILURE. THE DEALER STATED THAT THE FAILURE WAS NORMAL.
6	THE CURRENT MILEAGE WAS 1,500 AND FAILURE MILEAGE WAS 50.
7	1 Affected Product
8	December 9, 2008 NHTSA ID NUMBER: 10251226
9	Components: STEERING
10	NHTSA ID Number: 10251226 Incident Date October 9, 2007
11	Consumer Location OREGON CITY, OR Vehicle Identification Number 1FTSX21596E****
12	Summary of Complaint
13	CRASHNo FIRENo
14	INJURIES0 DEATHS0
15	TL*THE CONTACT OWNS A 2006 FORD F-250 SD. WHILE DRIVING 75 MPH OR ANY HIGH
16	SPEED, THE VEHICLE SHAKES VIOLENTLY WHEN IT DRIVES OVER A BUMP IN THE ROAD. THE SHAKING IS UNCONTROLLABLE AND THE CONTACT CAN BARELY CONTROL
17	THE VEHICLE. THE DEALER TEST DROVE THE VEHICLE AT LOW SPEEDS AND FOUND NO FAILURES. THE FAILURE MILEAGE WAS 12,000.
18	1 Affected Product
19	
20	June 26, 2009 NHTSA ID NUMBER: 10275011 Components: STEERING
21	NHTSA ID Number: 10275011
22	Incident Date April 2, 2009 Consumer Location Unknown
23	Vehicle Identification Number 1FTSW21P46E**** Summary of Complaint
24	CRASHNo
25	FIRENo INJURIES0
26	DEATHS0
27	WHEN DRIVING WHEN YOU GO OVER A BUMP ,RXR CROSSING OR MAN HOLE COVER THE FRONT END OF THE VEHICLE SEVERELY SHAKES TO THE POINT YOU HAVE TO JAM
28	ON THE BRAKES OR WRECK. I REPLACED THE STEERING STABILIZER AS INSTRUCTED TO BUT THE OUTCOME HAS NOT CHANGED. <u>I HAVE CALLED FORD NUMEROUS</u>
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1 2 3	TIMES,BOTH THE DEALER AND FORD MANUFACTURER. THEY BOTH ACT LIKE THEY HAVE NEVER HEARD OF THIS SEVERE PROBLEM. *TR 1 Affected Product
4	
5	March 31, 2011 NHTSA ID NUMBER: 10393902 Components: STEERING
-	NHTSA ID Number: 10393902
6	Incident Date March 28, 2011 Consumer Location JACKSONVILLE, FL
7	Vehicle Identification Number 1FTSW21PX6E****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0 DEATHS0
11	2006 FORD F-250 EXPERIENCES A SEVERE VIBRATION BETWEEN 50 - 65 MPH.
	SPECIFICALLY NOTICED AFTER HITTING A POTHOLE OR DRIVING ON UNEVEN ROADS.
12	TRUCK IS COMPLETELY STOCK AND HAS HAD SHOCKS/ STEERING STABILIZER / BRAKES / TIRES / ALIGNMENT / (REPLACED/COMPLETED) AT A CERTIFIED FORD
13	DEALER WITHIN THE PAST 2 MONTHS. ADDITIONALLY, I HAD EVERY BALL JOINT, TIE
14	ROD END, STEERING COMPONENT INSPECTED AT MY COST TO INVESTIGATE THE ISSUE.
15	THE STEERING VIBRATION STILL EXISTS. FORUMS AND OTHER SITES HAVE STARTED TO CALL THIS THE "DEATH WOBBLE". ALTHOUGH IT CAN BE ESCAPED BY SLOWING
16	DOWN OR ACCELERATING THROUGH THE VIBRATION, IT CAN EASILY CAUSE LOSS OF
17	CONTROL TO THE UNEXPECTED DRIVER. I HAVE DRIVEN FORD VEHICLES (TRUCKS) FOR THE PAST 20 YEARS AND THIS IS THE FIRST TIME I HAVE VENTURED TO FILE AN
	OFFICIAL COMPLAINT. FOLLOWING THE SERVICE BULLETIN TO ADJUST TIRE PRESSURE
18	DID NOT CORRECT THE PROBLEM. BRAND NEW TIRES AND ALIGNMENT OFFERED A MINOR REPRIEVE ONLY FOR ME TO EXPERIENCE THE SAME ISSUES LESS THAN 50
19	MILES LATER. PEOPLE WHO HAVE EXPERIENCED THIS ISSUE NEED TO GET SPECIFIC IN
20	ORDER TO PROMPT ACTION FROM EITHER THE NHTSA OR THE FORD MOTOR
21	COMPANY. I DID NOT EXPERIENCE THIS ISSUE TILL APPROXIMATELY 60,000 MILES, SOMETIME AFTER A BRAKE CHANGE. THE SUBSEQUENT ISSUES LEAD ME TO CHANGE
22	THE AFOREMENTIONED EQUIPMENT IN ORDER TO RESOLVE THE ISSUE. TO THIS POINT,
	THE DEALERSHIP CAN FIND NOTHING WRONG BUT THE ISSUE REMAINS. TO REINTERATE, THIS TRUCK IS STOCK, NO MODIFICATIONS HAVE BEEN MADE AND
23	REQUIRED MAINTENANCE HAS BEEN CONDUCTED BY THE DEALER IN EVERY
24	INSTANCE. *TR
25	1 Affected Product
26	
27	August 1, 2011 NHTSA ID NUMBER: 10416598
28	Components: STEERING NHTSA ID Number: 10416598
20	Incident Date June 22, 2008
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1 2 3 4 5 6 7 8 9 10	Consumer Location COLLIERVILLE, TN Vehicle Identification Number 1FTSW21P96E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO THE TRUCK AT 55 - 65 MPH GOES INTO WHAT HAS BEEN DESCRIBE AS A DEATH WOBBLE. THE TRUCK STARTS SHAKING VIOLENTLY. IT IS ALL YOU CAN DO TO KEEP CONTROL OF THE TRUCK UNTIL YOU SLOW DOWN TO ABOUT 40 MPH WHICH IS DANGEROUS ON THE FREEWAY. FORD HAS A DEFECT IN THE STEERING ON THESE TRUCKS AND IT NEEDS TO BE FIXED. I FEAR FOR MY FAMILY'S SAFETY. <u>THE FORD</u> <u>DEALERSHIP CANNOT FIX IT.</u> IT HAS BEEN DOING THIS SINCE ABOUT 12000 MILES. IT NOW HAS 100000 MILES AND STILL HAS NOT BEEN FIXED. IT HAS BEEN DOING THIS SINCE ABOUT 2008. *KB 1 Affected Product
11	
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	NHTSA ID Number: 10256667 Incident Date May 20, 2008 Consumer Location HICKORY, NC Vehicle Identification Number 1FTWW33P46E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I OWN A 4WD F350 DUALLY. WHILE TRAVELING AT HIGHWAY SPEEDS APPROX. 45MPH AND ABOVE AND AFTER TRAVELING OVER AN UNEVEN ROAD SURFACE OR BUMP IN THE ROAD, THE FRONT END GOES INTO AN UNCONTROLLABLE SHIMMY/OSCILLATION. THIS CAN ONLY BE STOPPED BY PULLING OVER AND COMPLETELY STOPPING THE VEHICLE. <u>I HAVE TAKEN THE TRUCK TO A FORD DEALERSHIP WHO CHECKED THE</u> FRONT END AND SAID THERE WAS NOTHING WRONG W/ THE TRUCK AND THAT IT WAS A TIRE PROBLEM. I HAVE SINCE THEN BOUGHT NEW TIRES WHICH SOMEWHAT LESSENED THE PROBLEM BUT DID NOT CORRECT IT. I ALSO HAVE TAKEN THE TRUCK TO A REPUTABLE INDEPENDENT ALIGNMENT SHOP, AND THEY TOLD ME THAT THEY HAVE SEEN A LOT OF TRUCKS W/ THE SAME PROBLEM, BUT ARE UNABLE TO FIX IT
25	DUE TO THE DESIGN OF THE FRONT END. THE INDEPENDENT SHOP SAID THERE IS TO MUCH CASTOR IN THE FRONT END AND NO WAY TO ADJUST IT. I AM NOW ON MY
26	THIRD SET OF TIRES W/ ONLY 45000 MILES ON THE TRUCK. I BOUGHT THIS TRUCK FOR AROUND \$48,000.00 AND HAVE HAD THIS PROBLEM SINCE THE TRUCK HAD ABOUT
27 28	23000 MILES ON IT. I CANT EVEN DRIVE IT ON THE INTERSTATE DUE TO THE UNCONTROLLABLE FRONT END SHIMMY. <u>THE FORD DEALERSHIP WILL NOT</u> <u>ACKNOWLEDGE THAT I HAVE A PROBLEM.</u> I HAVE SEARCHED THE INTERNET AND
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1 2 3 4	HAVE FOUND POST AFTER POST OF PEOPLE WHO HAVE THE SAME PROBLEM WITH THEIR TRUCK AND THE LACK OF ACKNOWLEDGMENT FROM FORD. THIS IS A VERY SERIOUS PROBLEM AND TO DATE I HAVE SPENT OVER \$ 1,600.00 TRYING TO REMEDY IT. I HOPE SOME ONE FROM YOUR DEPT. IS FAMILIAR W/ THIS AND COULD POSSIBLY HELP ME. THANK YOU STEPHEN HALL *TR 1 Affected Product
5	
6	January 4, 2011 NHTSA ID NUMBER: 10374098 Components: SUSPENSION
7	NHTSA ID Number: 10374098
8	Incident Date January 3, 2006 Consumer Location VIRGINIA BEACH, VA
9	Vehicle Identification Number 1FTWW31P86E****
10	Summary of Complaint CRASHNo
11	FIRENO
12	INJURIES0 DEATHS0
13	APPROXIMATELY 1 MONTH AGO I PURCHASED A 2006 FORD F350 SUPER DUTY.WHILE
	TRAVELING ALONG HIGHWAYS 45-65MPH, AFTER HITTING A ROUGHER PORTION OF THE ROAD, THE FRONT WHEELS BEGIN TO HOP/SHAKE IN A HIGHLY UNSAFE MANNER
14	TO WHICH THE VEHICLE IS ALMOST UNCONTROLLABLE. THIS HAPPENS ALMOST
15	EVERYTIME I TRAVEL ON THE HIGHWAYS WHICH IS EVERYDAY. I HAVE RESEARCHED THIS ISSUE QUITE EXTENSIVELY ONLINE IN SUCH FORUMS AS THIS. MANY HAVE TRIED
16 17	REPLACING PARTS BUT IT SEEMS TO BE A MANUFACTURING DEFECT. I WANTED TO MAKE SURE NOTHING WAS OUT OF THE ORDINARY BEFORE I WASTE HUNDREDS OR
	THOUSANDS OF DOLLARS TRYING TO FIX. SAFETY IS OF THE MAIN CONCERN FOR
18	MYSELF AND ESPECIALLY OTHERS ON THE ROAD DUE TO THE SIZE OF THE VEHICLE. <u>I</u>
19	HAVE CONTACTED A LOCAL REPUTABLE FORD DEALER AND THEY INFORMED ME THAT THERE ARE NO RECALLS AS OF TODAY JANUARY 4 2011. *TR
20	1 Affected Product
21	
22	April 4, 2011 NHTSA ID NUMBER: 10394247
23	Components: STEERING, SUSPENSION NHTSA ID Number: 10394247
24	Incident Date April 2, 2011
	Consumer Location LEBANON, OR Vehicle Identification Number 1FTWW31P36E****
25	Summary of Complaint
26	CRASHNo
27	FIRENo INJURIES0
28	DEATHS0
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C	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.222 Page 222 of 353
1 2 3 4 5	FORD F350 DEATH SHAKE HAS HAPPENED MULTIPLE TIMES TRUCK HITS BUMP OR POT HOLE REGARDLESS OF SPEED (BUT SHAKE IS WORSE OVER 40 MPH)AND STARTS A VERY DANGEROUS SHAKE THAT GETS WORSE UNTIL THE WHOLE TRUCK IS OUT OF CONTROL. BRAKING HARD TO STOP WILL STOP IT BUT ACCIDENT SEEMS TO BE AROUND THE CORNER. <u>I HAVE TAKEN TO DEALER AND TIRE SHOP THEY SAY</u> <u>NOTHING WRONG.</u> *TR 1 Affected Product
6 7 8 9	May 24, 2017 NHTSA ID NUMBER: 10991433 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 10991433 Incident Date May 21, 2017 Consumer Location BLACKFOOT, ID
10 11 12	Vehicle Identification Number 1FDWX37Y66E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> </ol>	WHILE TOWING MY LARGE CAMPER, ON THE FREEWAY, I HIT A BUMP. THE FRONT END OF THE TRUCK STARTED SHAKING VIOLENTLY. IT WAS ALL I COULD DO TO STOP THE TRUCK WITHOUT WRECKING. I HAD TO STOP IN THE TRAFFIC LANE. THIS WAS AN EXTREMELY DANGEROUS SITUATION. AFTER RESUMING TRAVEL, THE FRONT END WOULD SHIMMY AT ABOUT 45 MPH. I HAD TO DRIVE HOME AT 40 MPHROUGHLY ANOTHER 75 MILES. I THINK I HAVE SEEN AN ADVISORY LETTER FROM FORD, TO
17 18 19	OWNERS, CONCERNING THIS. THERE ARE MANY, MANY INSTANCES OF THIS HAPPENING. ONE CAN FIND DOZENS OF EXAMPLES OF THIS HAPPENING IF ONE LOOKS ON LINE. <b>NEITHER FORD NOR THE LOCAL FORD DEALER SEEMS TO BE AWARE OF</b> <b>THE PROBLEM.</b> WE WERE TRAVELING AT ABOUT 60 MPH AT THE TIME OF THE INCIDENT.
20 21	1 Affected Product
22	January 16, 2014 NHTSA ID NUMBER: 10560235 Components: STEERING
23 24	NHTSA ID Number: 10560235 Incident Date November 2, 2012 Consumer Location THEODORE, AL
25	Vehicle Identification Number 1FTWW33P46E**** Summary of Complaint
26 27 28	CRASHNo FIRENo INJURIESO DEATHSO
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1 2 3 4 5 6 7	DRIVING VEHICLE WITH FIFTH WHEEL 31 FT CAMPER IN TOW VEHICLE LURCHED TO THE LEFT AND ATTEMPTS TO CORRECT FOUND GREAT RESISTANCE IN STEERING RESPONSE. ON SEVERAL OCCASIONS SINCE AND AT NO SPECIFIC SPEED THE VEHICLE WILL LURCH TO THE LEFT OR RIGHT OR SHIMMY TO THE POINT THAT STEERING BECOMES ALMOST UNRESPONSIVE. I HAD THE VEHICLE CHECKED AND WAS ADVISED NOTHING WAS IN NEED OF REPLACEMENT. THEN I RECEIVED A LETTER FROM FORD MOTOR CO DESCRIBING THE EXACT STEERING SITUATION THAT I AM EXPERIENCING ALONG WITH RECOMMENDATIONS TO KEEP TIRES INFLATED PROPERLY, WHICH I HAVE AND CONTINUE TO HAVE CORRECT. <u>I CONTACTED FORD TO VOICE MY</u> <u>CONCERN AND WAS ADVISED THIS IS "JUST A NORMAL QUALITY OF A SOLID</u> <b>FRONT AXEL 4 WHEEL DRIVE TRUCK".</b> I USE THIS VEHICLE TO PULL A CAMPER AND
8	WHEN THIS "SEVERE VIBRATION AND OSCILLATION" OCCURS IT CAUSES THE TRUCK/TRAILER TO LURCH SO FAR AS TO CAUSE IT TO SHIFT LANES. THIS PROBLEM
9	OCCURS AT ALL SPEEDS, EVEN HIGHWAY SPEEDS OF 70MPH. I WAS ALSO TOLD THAT
10	THE LETTER WAS ONLY A "NOTIFICATION OF THE SITUATION AND HOW TO AVOID" AND NOT A RECALL. FURTHERMORE, FORD ADVISED THAT I TAKE THE VEHICLE IN TO
11	A FORD DEALER AT MY COST TO ENSURE THAT THIS WAS THE CAUSE OF THE
12	PROBLEM. THIS SITUATION IS SEVERE ENOUGH THAT IT COULD AND PERHAPS HAS BEEN THE CAUSE OF TRAFFIC ACCIDENTS. HOW LONG WILL THIS BE ALLOWED TO GO
13	ON BEFORE A RECALL IS ISSUED? HAVING IDENTIFIED A VEHICLE STEERING PROBLEM, THAT IN MY OPINION COULD BE LIFE THREATENING, SHOULD BE SUFFICIENT CAUSE
14	FOR A RECALL TO BE ISSUED. *TR
15	1 Affected Product
16	February 19, 2009 NHTSA ID NUMBER: 10259399
17	Components: SUSPENSION, POWER TRAIN
18	NHTSA ID Number: 10259399 Incident Date February 15, 2009
19	Consumer Location ROCK PORT, MO
20	Vehicle Identification Number 1FTWW31P56E**** Summary of Complaint
21	CRASHNo FIRENo
22	INJURIES0 DEATHS0
23	I PURCHASED MY 2006 SUPERDUTY NEW IN JUNE 2006 WHEN THE TRUCK WAS NEW I
24	HAD SOME SHAKING IN THE FRONT END AT SPEEDS OVER 65 BUT RECENTLY IT HAS GOT MUCH WORSE. THIS HAS OCCURRED AT LEAST TEN TIMES NOW AND THE LAST
25	FEW TIMES ON THE INTERSTATE WHEN GOING AROUND 70 MPH IF YOU HIT ROUGH
26	SPOTS IT WILL START A VIOLENT SHAKE IF I SLOWLY REDUCE SPEED IT WILL STOP AROUND 45 MPH. I AM STARTING TO THINK IT IS NOT EVEN SAFE ENOUGH FOR MY
27	FAMILY TO RIDE IN THE TRUCK ANYMORE. <u>MY DEALER SAYS THEY DON'T SEE ANY</u> PROBLEMS SO I HAVE NOT BEEN ABLE TO GET ANYTHING DONE TO RESOLVE THIS
28	PROBLEM EVEN THOUGH THE TRUCK HAS LESS THAN 36,000 AND IS STILL UNDER
-	BUMPER TO BUMPER WARRANTY TILL JUNE OF THIS YEAR. I HAVE HAD MANY
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1 2 3 4 5	FORDS OVER THE PAST 8 YEARS AND I WOULD LIKE TO THINK THAT FORD WILL TAKE CARE OF THIS IF THEY WANT TO KEEP ME AS A LOYAL CUSTOMER. I DON'T THINK I SHOULD BE RESPONSIBLE TO PAY FOR FORDS DESIGN FLAWS OUT OF MY POCKET (IF THERE EVEN IS A WAY TO FIX IT). IF FORD WILL NOT DO SOMETHING TO PERMANENTLY FIX THE PROBLEM MY WIFE AND I WILL NO LONGER BUY FROM THEM. *TR 1 Affected Product
6 7 8 9	January 30, 2012 NHTSA ID NUMBER: 10445958 Components: STEERING NHTSA ID Number: 10445958 Incident Date May 25, 2011 Consumer Location BOWLING GREEN, KY
10 11 12	Vehicle Identification Number 1FTWW33P46E**** Summary of Complaint CRASHNo FIRENo INJURIES0
13 14 15	<b>DEATHS0</b> I PURCHASED THE TRUCK USED MAY 2011. THE VERY DAY I PURCHASED THE TRUCK I GOT A WOOBLE WHEN I HIT A BUMP. THIS IS A DAILY OCCURANCE. WHEN I HIT A BUMP JUST RIGHT OR WHEN I APPLY MEDIUM TO HARD BREAKING IT BEGINS TO WOBBLE TO GET IT UNDER CONTROL I HAVE TO BREAK HARD AND COME ALMOST TO
16 17 18	A COMPLETE STOP. <b>I HAVE HAD IT IN THE DEALERSHIP 3 TIMES I WAS TOLD THERE</b> <b>WAS NOTHING WRONG WITH THE FRONT END, AND WAS TOLD TO ADJUST MY AIR</b> <b>PRESSURE LOWER, THEY ADJUSTED IT, IT CORRECTED NOTHING.</b> I HAVE BEGAN TO JUST DRIVE AND DEAL WITH IT TILL TODAY. IT SHOOK ME INTO AN ONCOMING LANE BEFORE I GOT IT UNDER CONTROL. I REALIZE THIS IS NOT A NEW TRUCK, THIS PROBLEM SEEMS TO BE BEING SWEPT UNDER THE RUG. SOME WILL GET INJURED OR
<ol> <li>19</li> <li>20</li> <li>21</li> <li>21</li> </ol>	KILLED IF THIS IS NOT RESOLVED. I DON'T DARE LET MY WIFE DRIVE THE TRUCK BECAUSE I KNOW SHE DOES NOT HAVE THE SKILLS TO CONTROL THIS. *TT 1 Affected Product
22 23 24	December 30, 2008 NHTSA ID NUMBER: 10253225 Components: SUSPENSION NHTSA ID Number: 10253225 Incident Date June 1, 2008
25 26	Consumer Location ALPINE, CA Vehicle Identification Number N/A Summary of Complaint CRASHNo
27 28	FIRENo INJURIESO DEATHSO -224-
	Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.225 Page 225 of 353
1 2 3 4 5 6	2007 F250 SUPER DUTY SHAKES VIOLENTLY WHEN AT SPEEDS AT 60-65 AND HITS A BUMP. SHAKES ONLY ON THE RIGHT SIDE. HAS BEEN HAPPENING FOR EIGHT MONTHS. HAS TAKEN IT INTO THE DEALER 2-3 TIMES AND THEY CAN NOT FIND ANYTHING WRONG. THEY TOLD ME IT WAS "UNSAFE TO DRIVE" BUT GAVE IT BACK TO ME AND SAID I COULD DRIVE IT. MAKES DRIVING IN DOWNTOWN SAN DIEGO DIFFICULT. THE SHAKING LASTS FROM 3-20 MINUTES. SHAKES WHILE TOWING CARS AND IS VERY SCARY. *TR 1 Affected Product
7 8 9 10 11	April 13, 2009 NHTSA ID NUMBER: 10265146 Components: FUEL SYSTEM, DIESEL, POWER TRAIN, ENGINE AND ENGINE COOLING, SUSPENSION NHTSA ID Number: 10265146 Incident Date April 5, 2009 Consumer Location CADIZ, KY Vehicle Identification Number 1FTSX21P67E****
12 13 14 15 16 17 18 19 20 21	Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I HAVE A FORD F250 2007 4X4 DIESEL. WENT OVER A BUMP IN THE ROAD AND THE STEERING WHEEL STARTED SHAKING SO BAD I RAN OFF THE ROAD. FORD SENT ME A LETTER ABOUT TIRE PRESSURE, BUT I ASSURE YOU I CHECK MY TIRES AT LEAST ONCE A WEEK BECAUSE I PULL EQUIPMENT ALMOST DAILY. FORD IS TRYING TO COVER UP SOMETHING AND IT NEEDS TO BE FIXED. <u>I HAVE HAD THE TRUCK ALMOST TWO</u> YEARS, AND HAVE HAD IT BACK AT THE DEALERSHIP 29 TIMES IN 22 MONTHS. THEY HAVE AN ISSUE WITH EITHER THE TURBO OR THE ICP AND KEEP TELLING ME IT IS NORMAL. I WAS WONDERING WHO WOULD LIKE TO SEE THE VIDEOS OR HEAR THE TAPE RECORDINGS OF THEM TELLING ME NORMAL IS WHEN THE TRUCK IS HOPING SO BAD THE FRONT TIRES COME OFF THE GROUND. *TR 1 Affected Product
21 22 23 24 25 26 27 28	January 27, 2009 NHTSA ID NUMBER: 10256489 Components: STEERING, WHEELS NHTSA ID Number: 10256489 Incident Date October 30, 2007 Consumer Location CITY OF INDUSTRY, CA Vehicle Identification Number 1FTSW21P47E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 -225- Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.226 Page 226 of 353
1 2 3 4 5 6	TL*THE CONTACT OWNS A 2007 FORD F-250 SD. THE CONTACT NOTICED THAT THE STEERING COLUMN AND WHEELS VIBRATE ABNORMALLY. SPEED WAS NOT A FACTOR DURING THE FAILURES. HIS CONTROL OF THE VEHICLE WAS SIGNIFICANTLY REDUCED. HE TOOK THE VEHICLE TO THE DEALER AND THEY STATED THAT THE FAILURE WAS A NORMAL CHARACTERISTIC OF THE VEHICLE. HE CALLED THE MANUFACTURER AND IS WAITING FOR A RESPONSE. THE FAILURE MILEAGE WAS 300 AND CURRENT MILEAGE WAS 31,100. 1 Affected Product
7 8 9 10 11 12 13 14 15 16 17	July 21, 2008 NHTSA ID NUMBER: 10235162 Components: SUSPENSION NHTSA ID Number: 10235162 Incident Date November 13, 2006 Consumer Location SAN DIEGO, CA Vehicle Identification Number 1FTWW31Y47E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL*THE CONTACT OWNS A 2007 FORD F350. WHILE DRIVING 55 MPH AND HIGHER, THE FRONT END OF THE VEHICLE SHAKES VIOLENTLY AND BECOMES UNCONTROLLABLE. THE DEALER COULD NOT DUPLICATE THE FAILURE. THE CURRENT MILEAGE WAS 9,670 AND FAILURE MILEAGE WAS 700. 1 Affected Product
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	July 29, 2010 NHTSA ID NUMBER: 10346223 Components: STEERING NHTSA ID Number: 10346223 Incident Date July 26, 2010 Consumer Location JESUP, IA Vehicle Identification Number 1FTSX21568E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 IBOUGHT A 2008 FORD F-250 EXTENDED CAB TRUCK AND WHEN I GO OVER A SMALL BUMP IN THE ROAD THE FRONT END SHAKES REAL BAD TO THE POINT I ALMOST LOST CONTROL GOING DOWN A HIGHWAY AT 55MPH. I CHECKED THE AIR PRESSURE IN THE TIRES AND THEY WERE AT 70PSI IN THE FRONT AND 80PSI IN THE BACK. THE DOOR STICKER SAID THE PRESSURES SHOULD BE 70 IN THE FRONT AND 80 IN THE BACK. I HAVE REPLACED THE SHOCKS AND STEERING STABILIZER SHOCK AND IT DID NOT MAKE A DIFFERENCE. THE OLD SHOCKS APPEARED TO BE IN GOOD SHAPE YET. I THEN -226- Class Action Complaint
	Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.227 Page 227 of 353
1 2 3 4 5 6 7 8 9	REPLACED THE TIRES EVEN THOUGH THEY WERE STILL GOOD AND THEY WERE WORN EVENLY. STILL DID NOT FIX IT. I THEN DROPPED MY AIR PRESSURE IN THE TIRES TO 60PSI FRONT AND BACK TO IF IT MADE A DIFFERENCE. STILL DID NOT FIX IT. <u>I HAD</u> <u>THE DEALERSHIP LOOK AT IT AND THEY SAID THEY COULD NOT FIND ANYTHING</u> <u>WRONG WITH IT.</u> I OWNED A 1999 F-250 AND IT NEVER HAD THIS PROBLEM. I HAD 165,000 MILES ON IT WHEN I TRADED IT IN FOR THIS ONE. I GOOGLED MY PROBLEM AND FOUND A LOT OF PEOPLE WITH THE SAME PROBLEM. FORD NEEDS TO COME UP WITH A REPAIR FOR THIS SOON. I WON'T LET MY WIFE DRIVE THIS TRUCK FOR FEAR OF THIS HAPPENING AND HER ENDING UP IN A WRECK. FORD NEEDS TO THINK ABOUT THE PEOPLE AND CHILDREN THAT RIDE IN THERE VEHICLES AND THE LIVES THAT THEY COULD TAKE. I AM A FORD DRIVER ALL MY VEHICLES ARE FORD AND I'M NOT MAD AT FORD YET BUT THEY NEED TO CURE THIS PROBLEM. THIS PROBLEM IS FOR SURE A DESIGN FLAW. *TR 1 Affected Product
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> </ol>	March 13, 2010 NHTSA ID NUMBER: 10319436 Components: SUSPENSION NHTSA ID Number: 10319436 Incident Date March 12, 2010 Consumer Location RAYMOND, NH Vehicle Identification Number 1FTWX31508E**** Summary of Complaint CRASHNo FIRENo
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>23</li> </ol>	INJURIES0 DEATHS0 2008 F-350 HAS WHAT THEY CALL THE "DEATH WOBBLE" AND HAS A CONSTANT SHAKE AT HIGHWAY SPEEDS. FORD BLAMED IT ON THE TIRES. I REPLACED TIRES WITH ONE OF THE BEST YOU CAN BUY. CONTINUED TO DO THE SAME THING. FORD BLAMED IT ON THOSE TIRES. BEEN IN FOR SERVICE 5 TIMES IN 1 YEAR. DEALERSHIP TOLD ME NOT TO COME BACK BECAUSE THEY CAN'T FIX IT. FORD TELLS ME TO GO BACK TO THE DEALERSHIP. SOMEDAY I'M GOING TO KILL SOMEONE OR MYSELF IN THIS TRUCK SINCE I HAVE NO CONTROL WHEN THE "DEATH WOBBLE" STARTS UNTIL I CAN SLOW DOWN TO ABOUT 20 MPH ON AN INTERSTATE HIGHWAY. UPDATED IVOQ 05/26/10 1 Affected Product 2 Associated Documents
24 25 26 27 28	November 29, 2012 NHTSA ID NUMBER: 10486420 Components: SUSPENSION NHTSA ID Number: 10486420 Incident Date June 1, 2012 Consumer Location SILT, CO Vehicle Identification Number 1FTWW31R48E**** Summary of Complaint -227-
	Class Action Complaint Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.228 Page 228 of 353
1 2 3 4 5 6 7 8 9 10	CRASHNO FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2008 FORD F-350 SUPER DUTY. THE CONTACT STATED THAT WHEN DRIVING 55-70 MPH OVER A ROAD BUMP, THE VEHICLE WOULD SHAKE UNCONTROLLABLY. THE CONTACT HAD TO APPLY PRESSURE TO THE BRAKE PEDAL IN ORDER TO CONTROL THE VEHICLE. THE FAILURE WAS EXPERIENCED NUMEROUS TIMES. THE VEHICLE WAS TAKEN TO THE DEALER WHO TEST DROVE THE VEHICLE, BUT WAS UNABLE TO DUPLICATE THE FAILURE. THE CONTACT TOOK THE VEHICLE TO A TIRE SPECIALIST WHO PERFORMED AN ALIGNMENT AND REPLACED THE TIRES AND SHOCKS HOWEVER, THE FAILURE WAS NOT CORRECTED. THE VEHICLE CONTINUED TO SHAKE UNCONTROLLABLY WHEN DRIVING OVER A ROAD BUMP. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 29,800 AND THE CURRENT MILEAGE WAS 30,000. 1 Affected Product
11 12 13 14 15 16 17	February 5, 2018 NHTSA ID NUMBER: 11067094 Components: STEERING, SUSPENSION NHTSA ID Number: 11067094 Incident Date February 3, 2018 Consumer Location NORTHPORT, AL Vehicle Identification Number 1FTWW31R78E**** Summary of Complaint CRASHNo FIRENo INJURIES0
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	INJURIESO DEATHSO AFTER HITTING A BUMP IN THE ROAD, THE TRUCK WILL SHAKE VIOLENTLY AND ATTEMPT TO GET OUT OF CONTROL. THE ONLY WAY TO CORRECT THIS IS BRING THE VEHICLE SPEED DOWN TO UNDER 20 MPH. THIS PROBLEM BEGAN OCCURRING SPORADICALLY ABOUT ONE YEAR AGO AND HAS GOTTEN CONSISTENTLY WORSE. IT IS SO SEVER THAT I HAVE DECIDED TO PARK THE VEHICLE OUT OF A CONCERN FOR SAFETY. <u>I HAD THE VEHICLE INSPECTED AT THE LOCAL FORD DEALERSHIP</u> <u>APPROXIMATELY 3-4 MONTHS AGO AND THEY SAID EVERYTHING WAS FINE.</u> <u>TODAY</u> , I RECEIVED IN THE MAIL A NOTICE MARKED "SPECIAL FIELD ACTION 09L02" THAT SAYS THE PROBLEM IS DUE TO TIRE INFLATION. I HAVE THE PROPER SIZE TIRES AND I KEEP THEM PROPERLY INFLATED. AFTER RESEARCHING THIS, I HAVE NOTICED THAT THIS PROBLEM DATES BACK TO 2005 AND FORD HAS SENT THIS SAME NOTICE OUT MANY TIMES. IT IS NOT A TIRE PROBLEM. I BELIEVE IT IS A KNOWN SUSPENSION PROBLEM AND IT IS DANGEROUS. THIS NEEDS TO BE A MANDATORY RECALL AND IT NEEDS TO BE PAID FOR BY FORD. I CALLED THEIR SERVICE LINE TODAY AND WAS TOLD MY VEHICLE WASN'T PART OF ANY NOTICE OR RECALL. THE PAPER I GOT TODAY SAYS "THIS NOTICE APPLIES TO YOUR VEHICLE" AND GOES ON TO GIVE MY VIN #. IT IS A BIG PROBLEM AND NOW IT HAS A BIG COVER-UP TO GO WITH IT. -228-
	-228-

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1	1 Affected Product
3	September 17, 2013 NHTSA ID NUMBER: 10544035
4	Components: STEERING, SUSPENSION
5	NHTSA ID Number: 10544035 Incident Date September 1, 2010
-	Consumer Location NEWPORT NEWS, VA
6	Vehicle Identification Number 1FTSW21R79E**** Summary of Complaint
7	CRASHNo
8	FIRENo INJURIESO
9	DEATHS0
10	THE FRONT TIRES AND STEERING WHEEL SHIMMY LEFT TO RIGHT AT HIGHWAY SPEEDS. IT WAS BROUGHT TOP THE DEALERSHIP FROM WHERE IT WAS PURCHASED TO
11	BE REPAIRED. DEALERSHIP SAID THEY FOUND NO ISSUES WITH IT. IT WAS NOTICED
12	AGAIN AND BROUGHT BACK TO THE DEALERSHIP AFTER I REPLACED THE STEERING STABILIZER. I WAS TOLD AT THAT POINT THE TRACK BAR BALL JOINT WAS WORN AND
13	WAS CHARGED \$400.00 FOR THE REPAIR. THE VEHICLE IS PROGRESSIVELY GETTING
	WORSE. NOW THE FRONT END STARTS TO SHIMMY AND IS UNSAFE FOR ANY SPEED ABOVE 45MPH. THIS IS AN ONGOING ISSUE WITH ALL SUPER DUTY TRUCKS. THE
14	PROBLEM CAN BE SEEN ON LINE AT YOU TUBE / FORD DEATH WOBBLE. THE
15	TECHNICIAN THAT WORKED ON MY VEHICLE TOLD ME HE HAD NO IDEA WHAT WAS CAUSING THE PROBLEM. *TR
16	1 Affected Product
17	
18	December 14, 2011 NHTSA ID NUMBER: 10439936
19	Components: WHEELS, SUSPENSION NHTSA ID Number: 10439936
20	Incident Date June 15, 2010
21	Consumer Location COUNCIL BLUFFS, IA
22	Vehicle Identification Number 1FT7W2BT3BE**** Summary of Complaint
	CRASHNo
23	FIRENo INJURIESO
24	DEATHS0
25	I HAVE EXPERIENCED A VIOLENT WOBBLE IN MY FRONT END OF THE 2011 FORD 250 CREW CAB DIESEL. HAVE TAKING IT TO A FORD DEALER FOUR TIMES , THEY SAY
26	THAT THEY CAN NOT FIND ANYTHING WRONG. AT 50+ THE TRUCK SHIMMIES SO BAD
27	I HAVE TO SLOW DOWN TO ALMOST A STOP TO STOP THE SHIMMY. I'M AT THE POINT WHERE IT FEELS UNSAFE TO DRIVE. THANK YOU FOR YOUR TIME. *TR
28	1 Affected Product
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	Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.230 Page 230 of 353
1 2 3 4 5 6 7 8 9 10	October 23, 2014 NHTSA ID NUMBER: 10649518 Components: STEERING, SUSPENSION NHTSA ID Number: 10649518 Incident Date October 22, 2014 Consumer Location ZEBULON, NC Vehicle Identification Number 1FT7W2BT9BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 MY HUSBAND WAS DRIVING THROUGH A ROAD CONSTRUCTION WORK ZONE WHEN SUDDENLY THE STEERING WHEEL STARTED SHAKING VIOLENTLY AND JUMPED OUT OF HIS HANDS . HE LOST CONTROL OF THE TRUCK . THE OTHER DRIVERS WERE ABLE TO COMPENSATE FOR THE OUT OF CONTROL TRUCK AND AN ACCIDENT WAS AVOIDED
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> </ol>	. I WENT ON TO RESEARCH THIS ISSUE . I FOUND A FORUM WITH MANY OTHERS HAVING THE SAME ISSUE . <u>MY HUSBAND TOOK IT TO THE LOCAL DEALERSHIP</u> WHERE THEY SAY THEY HAVE NO KNOWLEDGE OF SUCH ISSUES . THEY TOLD HIM IT WAS POOR TIRE PRESSURE OR OUT OF ALIGNMENT . MY HUSBAND HAD BOTH CHECKED AND THERE WAS NO PROBLEM . I FEAR IT IS JUST A MATTER OF TIME BEFORE THERE IS A SEVERE ACCIDENT DUE TO THIS ISSUE . THE OTHERS SAY THE VEHICLE CONTINUES TO DO THE" DEATH WOBBLE" AS IT HAS BEEN COINED ONLINE . PLEASE HAVE SOMEONE LOOK INTO THIS PROBLEM . I HAVE ALSO EMAILED FORD MOTOR COMPANY . *TR 1 Affected Product
18         19         20         21         22         23         24         25         26         27         28	May 23, 2015 NHTSA ID NUMBER: 10721166 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 10721166 Incident Date October 10, 2014 Consumer Location REEDVILLE, VA Vehicle Identification Number 1FT7X2B64BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WE HAVE HAD ABOUT FOUR OCCASIONS WHERE OUR TRUCK SUDDENLY BEGINS TO SHAKE AND VIBRATE, CANNOT CONTROL THE SHIMMY UNTIL YOU CAN SLOW IT DOWN UNDER 30 MPH. IT HAPPENED THREE TIMES AT ABOUT 33,000 MILES. TWO TIMES IT WAS COMING OFF BRIDGE, HITTING A STEEL CHANNEL AT THE JUNCTION AND ONE TIME A LARGE HOLE. ALL THREE TIMES IT WAS ONE WHEEL HITTING THE HOLE OR DEPRESSION BEFORE THE OTHER WHEEL HIT. <u>WE TOOK IT TO FORD</u> DEALERSHIPNO IDEAS THERE. THEY REBALANCED THE LEFT TIRE AND NO MORE -230-
	Class Action Complaint Case No.

0	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.231 Page 231 of 353
1 2 3 4	PROBLEMS UNTIL TODAY WHEN IT HAPPENED AGAIN WHEN COMING OFF A BRIDGE. ABOUT 38,000 MILES AND IT WAS THE SAME THING. CANNOT CONTROL THE SHIMMY UNTIL THE VEHICLE HAS SLOWED TO ABOUT 30 MILES PER HOUR. MOST FRIGHTENING! I REFUSE TO DRIVE IT AGAIN UNTIL THIS IS FIGURED OUT! BIG, OUT-OF-CONTROL TRUCK IS NOT MY CUP OF TEA. 1 Affected Product
5	
6	December 22, 2015 NHTSA ID NUMBER: 10811752 Components: SUSPENSION
7	NHTSA ID Number: 10811752
8	Incident Date November 1, 2015 Consumer Location ALBUQUERQUE, NM
9	Vehicle Identification Number 1FT7W2BT2BE****
10	Summary of Complaint
	CRASHNo FIRENo
11	INJURIES0
12	DEATHS0
13	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. WHILE DRIVING VARIOUS SPEEDS, THE FRONT END OF THE VEHICLE SHOOK VIOLENTLY. THE VEHICLE WAS TAKEN TO THE
14	DEALER. THE TECHNICIAN STATED THAT THE VEHICLE WAS WORKING UP TO
	<b>SPECIFICATIONS.</b> THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE.
15	THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 100,000. <b>1 Affected Product</b>
16	I Affecteu I fouuct
17	
18	September 20, 2012 NHTSA ID NUMBER: 10476564 Components: STEERING
	NHTSA ID Number: 10476564
19	Incident Date September 1, 2012
20	Consumer Location WALPOLE, MA
21	Vehicle Identification Number 1FT7X2B65BE**** Summary of Complaint
22	CRASHNo
	FIRENo
23	INJURIES0
24	DEATHS0 TL* THE CONTACT OWNS A 2011 FORD F250 SD. THE CONTACT STATED THAT WHILE
25	DRIVING 60 MPH OVER A ROAD BUMP THE VEHICLE WOULD SHAKE
	UNCONTROLLABLY UNTIL THE SPEED DECELERATED TO 20 MPH. THE VEHICLE WAS
26	TAKEN TO THE DEALER WHO RAN A DIAGNOSTIC TEST AND COULD NOT DETERMINE ANY FAILURE WITH THE VEHICLE THEY ALSO CHECKED THE TIRE
27	DETERMINE ANY FAILURE WITH THE VEHICLE. THEY ALSO CHECKED THE TIRE PRESSURE BUT THERE WAS NO PROBLEM WITH THE TIRES. THE MANUFACTURER
28	WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 40,000.
	1 Affected Product
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	Class Action Complaint Case No.

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1	
2 3	November 18, 2013 NHTSA ID NUMBER: 10552684 Components: STEERING
3	NHTSA ID Number: 10552684
4	Incident Date October 9, 2013
5	Consumer Location VALLEY STREAM, NY
6	Vehicle Identification Number 1FT7W2B60BE**** Summary of Complaint
Ĩ	CRASHNo
7	FIRENo
8	INJURIES0 DEATHS0
9	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE
0	DRIVING 60 MPH OVER A ROAD BUMP, THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE CONTACT STATED THAT HE APPLIED THE BRAKES AND THE SHAKING CEASED.
1	THE VEHICLE WAS TAKEN TO THE DEALER FOR INSPECTION BUT THEY COULD NOT DIAGNOSE THE CAUSE OF THE FAILURE. THE VEHICLE WAS NOT REPAIRED.
2	THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE VEHICLE WAS NOT REFAILED.
13	35,000.
	1 Affected Product
14	
15	January 15, 2014 NHTSA ID NUMBER: 10560105
16	Components: STEERING
	NHTSA ID Number: 10560105
17	Incident Date January 15, 2013 Consumer Location Unknown
18	Vehicle Identification Number 1FT7W2BT2BE****
19	Summary of Complaint
	CRASHNo
20	FIRENo INJURIES0
21	DEATHSO
22	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE
23	TRAVELING APPROXIMATELY 60 MPH, THE VEHICLE SHOOK VIOLENTLY. <u>THE</u> VEHICLE WAS TAKEN TO THE DEALER WHERE THE FAILURE COULD NOT BE
	DIAGNOSED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT
24	CONTACTED ABOUT THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY
25	30,000.
26	1 Affected Product
27	L
28	January 27, 2014 NHTSA ID NUMBER: 10561609 Components: SUSPENSION, STEERING
	NHTSA ID Number: 10561609
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	Class Action Complaint
	Case No.

C	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.233 Page 233 of 353
1 2 3 4 5 6 7 8 9 10 11	Incident Date January 27, 2012 Consumer Location SAN ANTONIO, TX Vehicle Identification Number 1FT8W3DT2BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2011 FORD F-350 SD. WHILE DRIVING 55 MPH, THE CONTACT STATED THAT THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE CONTACT APPLIED THE BRAKES TO SLOW THE VEHICLE DOWN AND THE SHAKING SUBSIDED. <u>THE</u> VEHICLE WAS TAKEN TO THE DEALER FOR INSPECTION AND THEY WERE UNABLE TO DIAGNOSE THE FAILURE. THE CONTACT STATED THE TRAC BAR, BUSHINGS, BALL JOINTS, STEERING AND TIE ROD ENDS WERE ALL REPLACED. THE TIRES ON THE VEHICLE WERE REPLACED AND BALANCED BUT THE FAILURE RECURRED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 25,000. UPDATED 03/05/14*LJ THE CONSUMER STATED HE EXPREMENCED STEERING WHERE OSCILL ANTON FOR THE LAST 70 000 MILE ST. THE
12 13	EXPERIENCED STEERING WHEEL OSCILLATION FOR THE LAST 70,000 MILES. THE CONSUMER HAD NUMEROUS COMPONENTS REPLACED, BUT TO NO AVAIL. THE DEALER INFROMED THE CONSUMER THE OSCILLATION WAS NORMAL. 1 Affected Product
14	
15	June 7, 2015 NHTSA ID NUMBER: 10723796
16	Components: STEERING NHTSA ID Number: 10723796
17	Incident Date June 6, 2015
18	Consumer Location FARIBAULT, MN Vehicle Identification Number 1FT8W3BT7BE****
18 19	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint
	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo
19	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo
19 20	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo INJURIES0
19 20 21	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS
19 20 21 22	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. <u>THE</u> DEALER SAYS THERE IS NOTHING WRONG AND HAVE REPLACED TIE ROD ENDS
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. <u>THE</u>
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. <u>THE</u> <u>DEALER SAYS THERE IS NOTHING WRONG</u> AND HAVE REPLACED TIE ROD ENDS ALONG WITH BRAKES.
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	Vehicle Identification Number 1FT8W3BT7BE****         Summary of Complaint         CRASHNo         FIRENo         INJURIES0         DEATHS0         I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND         VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL         SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS         VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. THE         DEALER SAYS THERE IS NOTHING WRONG AND HAVE REPLACED TIE ROD ENDS         ALONG WITH BRAKES.         1 Affected Product
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. <u>THE</u> <u>DEALER SAYS THERE IS NOTHING WRONG</u> AND HAVE REPLACED TIE ROD ENDS ALONG WITH BRAKES. 1 Affected Product
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	Vehicle Identification Number 1FT8W3BT7BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. <u>THE</u> DEALER SAYS THERE IS NOTHING WRONG AND HAVE REPLACED TIE ROD ENDS ALONG WITH BRAKES. 1 Affected Product February 8, 2018 NHTSA ID NUMBER: 11071768 Components: ENGINE, STEERING

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1	Incident Date January 10, 2018
2	Consumer Location ARVADA, CO Vehicle Identification Number 1FTWW31P66E****
3	Summary of Complaint
4	CRASHNo FIRENo
5	INJURIES0 DEATHS0
6	TL* THE CONTACT OWNS A 2011 FORD F-350 SD. WHILE DRIVING AT AN UNKNOWN
7	SPEED, THE VEHICLE SHOOK VIOLENTLY. THE CONTACT HAD TO APPLY THE BRAKES TO SLOW DOWN THE VEHICLE AND STOP THE SHAKING. THE VEHICLE WAS DRIVEN TO
8	THE CONTACT'S HOME. THE DEALER (O'MEARA FORD, 400 W 104TH AVE,
9	<b>NORTHGLENN, CO 80234) STATED THAT THERE WERE NO RECALLS FOR THE</b> <b>FAILURE.</b> THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER
10	WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 190,000. <b>1 Affected Product</b>
11	
12	August 20, 2013 NHTSA ID NUMBER: 10536235
13	Components: SUSPENSION, STEERING
14	NHTSA ID Number: 10536235 Incident Date July 30, 2013
	Consumer Location TIFFIN, OH
15	Vehicle Identification Number N/A Summary of Complaint
16	CRASHNo
17	FIRENo
18	INJURIES0 DEATHS0
	I WAS DRIVING DOWN THE ROAD AND HIT A SMALL SEAM IN THE ROAD AT APPROX. 60
19 20	MPH AFTER HITTING THE SMALL SEAM MY WHOLE TRUCK BEGAN SHAKING VIOLENTLY TO A POINT WHERE I HAD NO CONTROL OVER THE VEHICLE. ONCE THIS
	HAPPENED I BEGAN REDUCING SPEED AND AS THE SPEED WAS REDUCED THE
21	SHAKING WAS REDUCED AS WELL. I HAD TO COME TO A COMPLETE STOP IN ORDER TO
22	STOP THE SHAKING. ONCE STOPPED THE TRUCK DROVE FINE FOR A WEEK THEN DID IT AGAIN AND SINCE HAS DONE IT IN THE TWO WEEK FOLLOWING. <u>THE DEALERSHIP</u>
23	LOOKED AT IT AND SAID THEY COULD SEE NOTHING WRONG AND THAT EVERYTHING WAS TIGHT. *TR
24	1 Affected Product
25	
26	August 30, 2014 NHTSA ID NUMBER: 10629639
27	Components: STEERING, SUSPENSION NHTSA ID Number: 10629639
28	Incident Date June 6, 2014
	Consumer Location BLUE MOUNDS, WI
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	Class Action Complaint Case No.

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1 2	Vehicle Identification Number 1FT7W2B61CE**** Summary of Complaint CRASHNo
3	FIRENo INJURIES0
4	DEATHS0 AFTER HITTING PATCHED PORTION ON ROAD FRONT WHEELS BEGAN TO SHAKE
5	VIOLENTLY. STEERING WHEEL SHOOK. STOPPED VEHICLE AND INSPECTED. SAW NO
6	DAMAGE SO I CONTINUED TO DRIVE. <u>I THEN TOOK TO LOCAL FORD DEALER FOR</u> REPAIR. NOT FINDING ANYTHING AS OF THIS DATE 8/30
7	1 Affected Product
8	
9	April 9, 2014 NHTSA ID NUMBER: 10578607 Components: WHEELS, STEERING, SUSPENSION
10	NHTSA ID Number: 10578607
11	Incident Date January 15, 2014 Consumer Location VALPARAISO, IN
12	Vehicle Identification Number 1FT8W3BT4CE****
13	Summary of Complaint CRASHNo
14	FIRENO
15	INJURIES0 DEATHS0
16	I AM EXPERIENCING WHAT THEY CALL THE "DEATH WOBBLE". AFTER HITTING A
17	SERIES OF BUMPS / POT HOLES, THE FRONT WHEELS START TO SHIMMY AND SHAKE THE TRUCK VIOLENTLY, VERY HARD TO CONTROL THE VEHICLE. AS THE MILEAGE
	INCREASES ON MY TRUCK, THE INCIDENTS ARE BECOMING MORE FREQUENT AND
18	INTENSE. TODAY, 04/09/2014, I ALMOST GOT KILLED LITERALLY ! ON I-65 SOUTH OF LAFAYETTE INDIANA, HIT A SERIOUS OF ROAD PATCH BUMPS AND HOLES THE
19	TRUCK BEGAN TO SHIMMY AND SHAKE AND IT WENT INTO A FRENZY, THE WHOLE
20	TRUCK SHAKING VIOLENTLY. CARS AROUND ME WERE DIVERTING AWAY, AND A SEMI WAS PUSHING HARD FROM BEHIND AND HIT HIS AIR BRAKES, I COULD NOT CONTROL
21	THE VEHICLE. APPLYING THE BRAKES ONLY MADE IT WORSE. I AM A 6' 3" STRONG
22	MUSCULAR MAN, AND COULD NOT CONTROL THE STEERING WHEEL OR DIRECTION OF
23	THE VEHICLE. I STARTED IN THE RIGHT LANE, BUT WOUND UP IN THE MEDIAN, AND ALMOST TOOK OUT (2) CARS TO MY LEFT AND OF COURSE THE IMPENDING SEMI
	BEHIND ME. I TOLD THE DEALER OF THE ISSUE, THEY DID THEIR INSPECTIONS
24	AND FOUND NOTHING. THE TRUCK IS OEM, I HAVE NOT ADDED OR MODIFIED A SINGLE THING, IT IS AS IT WAS FROM THE FACTORY. NOTHING HAS BEEN CHANGED OR
25	MODIFIED FROM THE ORIGINAL FACTORY CONDITION !! A FORD CERTIFIED
26	DEALERSHIP HAS SERVICED THIS VEHICLE SINCE THE DAY I BOUGHT IT NEW IN
27	FEBRUARY OF 2013. THERE HAVE BEEN LAWSUITS FILED, I HAVE NOT HAD THE TIME
28	TO DO MORE RESEARCH. BUT IT SEEMS PRETTY INCREDIBLE TO ME, THAT WITH THIS RECURRING ISSUE THAT GOES BACK 15 YEARS OR MORE, THAT THIS AGENCY OR FORD HAS DONE NOTHING TO ADDRESS OR CORRECT THE SITUATION. GUESS WE NEED AT
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	Class Action Complaint

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1 2 3 4	LEAST 12 DEATHS TO MAKE IT WORTH SOMEONE'S ATTENTION TO UNDERSTAND THAT THIS IS A SEVERE SAFETY PROBLEM, NOT ONLY TO THE DRIVER AND HIS OCCUPANTS, BUT TO OTHER DRIVERS ON THE ROAD AROUND ONE OF THESE TRUCKS WHEN THE "DEATH WOBBLE" DOES IT'S THING, TAKING OVER THE TRUCK. WHY IS THIS BEING IGNORED ?? *TR 1 Affected Product
5	
6	August 14, 2016 NHTSA ID NUMBER: 10895820 Components: STEERING, SUSPENSION
7	NHTSA ID Number: 10895820
8	Incident Date August 27, 2015 Consumer Location LAKESIDE, CA
9	Vehicle Identification Number 1FT8W3BT9CE****
10	Summary of Complaint CRASHNo
11	FIRENo
12	INJURIES0 DEATHS0
13	DEATH WOBBLE: DRIVING OVER A ROUGH PATCH OF FREEWAY OR OVER AN
	OVERPASS CROSS JOINT BETWEEN 50 - 65 MILES PER HOUR, I EXPERIENCE VIOLENT SHAKING DUE TO OSCILLATION OF THE FRONT WHEELS AND AXEL. MUST REDUCE
14	SPEED TO ~30 MILES PER HOUR TO MAKE THE SHAKING STOP. I HAVE
15	REPLACED/UPGRADED FRONT SHOCK ABSORBERS AND STEERING DAMPER WITH LITTLE EFFECT. I WILL NEXT REPLACE TIRES, ALIGN THE FRONT END AND HAVE THE
16	TRACK BAR (PANHARD BAR) REPLACED. THIS FIRST HAPPENED IN AUGUST 2015, THE
17	DEALER TOLD ME IT WAS NORMAL. MY TRUCK IS NOW OUT OF WARRANTY, AND
18	THIS HAPPENS REGULARLY. I KNOW A SPOT THAT THE OSCILLATION WILL OCCUR, AND DRIVE TO AVOID IT, HOWEVER IT HAPPENS REGULARLY WITHOUT WARNING.
19	1 Affected Product
20	
	February 1, 2015 NHTSA ID NUMBER: 10680339
21	Components: STEERING NHTSA ID Number: 10680339
22	Incident Date January 31, 2015
23	Consumer Location BOYCE, VA
24	Vehicle Identification Number 1FT8W3BT4CE**** Summary of Complaint
25	CRASHNo
26	FIRENo INJURIES0
27	DEATHSO
	ON I-81 THRU HARRISONBURG, VA CROSSING A BRIDGE WITH SEVERAL BUMPS IN IT.
28	THE STEERING WENT INTO UNCONTROLLED VIBRATION LIKE IT WAS COMING APART. I HAD TO SLOW DOWN TO 20 MPH TO GET IT TO STOP. 20 MPH AT NIGHT ON AN
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	Class Action Complaint
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.237 Page 237 of 353
	INTERSTATE IS HARDLY SAFE. ANOTHER TIME IT OCCURRED WHILE ENTERING AN ON- RAMP TO AN INTERSTATE. AGAIN, I HAD TO SLOW DOWN TO 20 MPH TO GET IT TO STOP. THE GUY BEHIND ME, ALSO TRYING TO MERGE, ALMOST HIT ME. THE VIBRATIONS HAVE OCCURRED SINCE THE TRUCK WAS ALMOST NEW. <u>THE FORD</u> <u>DEALER SAYS THIS IS NORMAL.</u> I THINK IT REPRESENTS AN ACCIDENT WAITING TO HAPPEN. IT ONLY OCCURS UNDER SPECIFIC CONDITIONS AT SPEEDS OF 50-60 MPH, A SLIGHT TURN AND ROAD BUMPS OF A CERTAIN FREQUENCY TO INITIATE THE SHAKING. UNDER THOSE CONDITIONS, A MECHANICAL RESONANCE WITH POSITIVE FEEDBACK SEEMS TO CREATE THE UNCONTROLLABLE SHUDDER. *TR 1 Affected Product
	September 22, 2017 NHTSA ID NUMBER: 11025099
	Components: ELECTRONIC STABILITY CONTROL, STEERING, SUSPENSION
	NHTSA ID Number: 11025099 Incident Date September 21, 2017
	Consumer Location MICANOPY, FL
	Vehicle Identification Number 1FT8W3BT7DE**** Summary of Complaint
	CRASHNo
	FIRENo
	INJURIES0 DEATHS0
	WHILE OUR TRUCK ON A NORMAL HIGHWAY WITH MINOR IRREGULARITIES AND SOME ROUGH SURFACES AT A SPEED OF 60 TO 70 MPH, THE TRUCK WILL START TO OSCILLATE TO THE POINT OF INDUCING A VIOLENTLY STEERING WHEEL SHIMMY AND AN UNCONTROLLABLE BOUNCE OF THE FRONT WHEELS. THIS HAS HAPPENED TWICE IN THE PAST 2-MONTHS WHEN I HAVE TAKEN THE TRUCK ON THE HIGHWAY, THE TRUCK IS PRIMARILY DRIVEN IN TOWN, I AM NOW SCARED TO GO ON THE ROAD WITH THE TRUCK AS THE CONDITION SEEMS TO BE GETTING WORSE. I HAVE TO BRAKE QUICKLY AND STEER THE TRUCK TO THE SIDE OF THE ROAD TO STOP THE OSCILLATION. THE SHAKING IS HAS ALMOST CAUSED AN ACCIDENT BOTH TIMES WITH THE VEHICLE BEING VERY DIFFICULT TO CONTROL. ONLY AFTER SLOWING TO APPROXIMATELY 30 MPH DOES THE OSCILLATION STOP. UPON RESEARCHING THIS PROBLEM, I AM PERPLEXED WHY FORD OR THE NTHSA HAVE NOT STEPPED FORWARD TO ADDRESS THIS ISSUE, SOMEONE WILL BE HURT OR KILLED IF A SOLUTION IS NOT FOUND. <b>WE HAVE TAKEN THE TRUCK NOW TO TWO DIFFERENT CERTIFIED FORD</b> <b>DEALERSHIPS AFTER EACH INCIDENT EACH TIME WE WERE TOLD THERE WAS</b> <b>NOTHING WRONG WITH THE VEHICLE AND THIS SOMETIMES HAPPENS WITH</b> <b>THESE TRUCKS.</b> THIS CAN'T SERIOUSLY BE TRUE? AFTER DOING RESEARCH I'VE FOUND THAT THE "DEATH WOBBLE" AS THIS PROBLEM HAS BEEN TERMED BY THE MASSES IS A SERIOUS PROBLEM AND HAS BEEN FOR MANY YEARS NOT FOR THE SELECT FEW CONSUMERS BUT FOR SO MANY. <b>1 Affected Product</b>
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	Class Action Complaint Case No.

C	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.238 Page 238 of 353
1 2	October 20, 2014 NHTSA ID NUMBER: 10648730 Components: ELECTRONIC STABILITY CONTROL, UNKNOWN OR OTHER,
2	SUSPENSION NHTSA ID Number: 10648730
4	Incident Date October 15, 2014 Consumer Location SANBORNTON, NH
5	Vehicle Identification Number 1FT7X3B66FE****
6	Summary of Complaint CRASHNo
7	FIRENo INJURIES0
8	DEATHS0
9	TRAVELING ON A PAVED ROAD. SPEED LIMIT 45 MPH. IT WAS RAINING. NO PUDDLING WAS ENCOUNTERED. I ENTERED A SLIGHT LEFT TURN AND ENCOUNTERED A
10	WASHBOARD TYPE BUMP. IMMEDIATELY, THE FRONT OF THE VEHICLE VIBRATED EXCESSIVELY. I RELEASED THE GAS PEDAL AND PUSHED SLIGHTLY ON THE BRAKES.
11	THE REAR OF THE VEHICLE STARTED TO VIBRATE AND THE REAR AXLE LOST TRACTION ALLOWING THE REAR OF THE VEHICLE TO SWING VIOLENTLY TO THE
12	RIGHT. I IMMEDIATELY WENT TO THE FORD DEALERSHIP WHERE I PURCHASED
13	THE VEHICLE LESS THAN 10 DAYS AGO. SERVICE BROUGHT IT IN AND I EXPLAINED THE ISSUE OF LOSS OF CONTROL AND AN UNSAFE CONDITION. THE SERVICE
14	ADVISOR IMMEDIATELY TOLD ME TO "PUT WEIGHT IN THE BACK OF THE TRUCK. THAT'S NORMAL." I INVOLVED THE SERVICE MANAGER WHO WENT WITH ME OVER
15	THE SAME ROUTE THAT CAUSED THE SAFETY ISSUE. HE SAID, "I SEE WHAT YOU WERE
16	TALKING ABOUT." <u>THE DEALERSHIP TOOK THE TRUCK IN FOR INSPECTION.</u> <u>NOTHING WAS FOUND MECHANICALLY.</u> DURING THE INSPECTION, THE REAR TIRE
17	PRESSURE WAS LOWERED TO 65 PSI INSTEAD OF THE RECOMENDED 80 PSI THAT WAS SET PRIOR FROM THE MANUFACTURER. THE TIRE PRESSURE MONITOR SYSTEM WAS
18	RE-CALIBRATED TO SHOW THE LOWERED TIRE PRESSURE. FRONT PRESSURES WERE LEFT AT THE RECOMMENDED 65 PSI. I AM NOW CONCERNED WITH EXCESSIVE TIRE
19	WEAR RUNNING THE TIRES UNDER-INFLATED. THE DEALERSHIP CALLED FORD AND
20	WAS ADVISED IT IS A "NORMAL CONDITION" TO ALMOST ROLL OVER A PICKUP WITH SUCH A STIFF SUSPENSION WITHOUT A LOAD IN THE BACK CONSTANTLY. FORD IS
21	<b><u>UNAWARE OF ISSUE.</u></b> LOWERED TIRE PRESSURES SLIGHTLY IMPROVED THE SAFETY ISSUE ON PAVEMENT, HOWEVER: YESTERDAY I WAS TRAVELING ON A ROAD THAT
22	HAD THE PAVEMENT REMOVED DOWN TO DIRT FOR REPAVING. I AGAIN HIT A
23	WASHBOARD, THIS TIME GOING STRAIGHT AND 25 MILES PER HOUR. THE SAME VIBRATE/SHAKING OCCURRED AND THE BACK END AGAIN SWUNG TO THE RIGHT
24	WITHOUT ANY BRAKING WHATSOEVER. I WAS CLOSE TO LOSING CONTROL. *TR 1 Affected Product
25	
26	August 11, 2017 NHTSA ID NUMBER: 11014734
27	Components: SUSPENSION NHTSA ID Number: 11014734
28	Incident Date July 25, 2016
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	Class Action Complaint Case No.

c	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.239 Page 239 of 353
1 2 3 4 5 6 7 8	Consumer Location SAHUARITA, AZ Vehicle Identification Number 1FT7W2BT1GE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO VEHICLE EXPERIENCES SEVERE BOUNCE BETWEEN 70-75 MPH. FORD HAS CONFIRMED ISSUE AND HAS STATED IT IS A "CHARACTERISTIC OF THE VEHICLE". ISSUE WAS REPORTED TO DEALER AND FORD AT TIME OF PURCHASE. BOUNCE IS VERY PRONOUNCED AND VEHICLE IS NOT SAFE DURING OPERATION. 1 Affected Product
9	January 7, 2019 NHTSA ID NUMBER: 11165555
10	Components: SUSPENSION, STEERING NHTSA ID Number: 11165555
11	Incident Date December 1, 2018
12	Consumer Location PHOENIX, AZ
13	Vehicle Identification Number 1FT7W2BT4HE**** Summary of Complaint
14	CRASHNo
15	FIRENO
	INJURIES0 DEATHS0
16	IN NOVEMBER OF 2018, AT 25,000 MILES, MY TRUCK BECAME TEMPORARILY
17	UNCONTROLLABLE WHILE TRAVELING ON A STRAIGHT AND LEVEL SECTION OF
18	INTERSTATE 10. I EXPERIENCED SEVERE OSCILLATION OF FRONT TIRES AT 70 MPH. I WAS ON STRAIGHT AND LEVEL GROUND AND WAS ABLE TO SLOW DOWN TO 30 MPH
19	AT WHICH TIME I REGAINED CONTROL. DURING THE INCIDENT, I WAS UNABLE TO MAINTAIN LANE INTEGRITY. AFTER STOPPING, I CHECKED THE TIRE PRESSURE AND
20	ALL TIRES WERE AT THE RECOMMENDED PRESSURE'S. TOOK THE VEHICLE TO
21	CHAPMAN FORD DEALER IN SCOTTSDALE AZ AND THE INSPECTION CAME BACK "NO PROBLEMS DETECTED". IN JANUARY 2019, AT 28,000 MILES I EXPERIENCED THE
22	SAME PROBLEM AT 50 MPH WHILE TRAVELING ON A STRAIGHT AND LEVEL PAVED
	ROAD. THIS TIME I DID NOT REGAIN CONTROL UNTIL 20 MPH. IN BOTH OF THE
23	DESCRIBED INSTANCES I WAS PULLING A LIGHT UTILITY TRAILER LOADED WITH A POLARIS RANGER. *NOTE: I DO NOT RECALL HITTING A BUMPY SECTION OF ROADWAY
24	TO INITIATE THE SEVERE OSCILLATION.
25	1 Affected Product
26	
	May 29, 2018 NHTSA ID NUMBER: 11098422
27	Components: SUSPENSION
28	NHTSA ID Number: 11098422 Incident Date April 4, 2018
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	Class Action Complaint
	Case No.

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.240 Page 240 of 353
1 2 3 4 5 6 7	Consumer Location INDIANAPOLIS, IN Vehicle Identification Number 1FTWW3DR4AE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO WHILE DRIVING ON THE INTERSTATE APPROX 60 MPH HITTING A BUMP THE FRONT END SHAKES VIOLENTLY UNTIL THE TRUCK SLOWS DOWN TO RECOVER. <u>HAD IT IN</u> THE DEALERSHIP TWICE AND THEY SAID NOTHING IS WRONG. 1 Affected Product
8	
9	October 16, 2018 NHTSA ID NUMBER: 11140682
10	Components: SERVICE BRAKES, ENGINE, SUSPENSION NHTSA ID Number: 11140682
11	Incident Date November 1, 2017
12	Consumer Location NEW WAVERLY, TX Vehicle Identification Number 1FT8X3DT1HE****
13	Summary of Complaint
	CRASHNo FIRENo
14	INJURIES0
15	DEATHS0 DEATH WOBBLE, YOU HIT A SMALL BUMP OR UNEVEN ROAD AT 20-75 MPH AND IT
16	SHAKES VIOLENTLY YOU HAVE TO SLOW DOWN TO 15MPH TO MAKE IT QUIT. THE
17	DEALER COULD NOT DUPLICATE AND SAID IT WAS TIRES OUT OF BALANCE, THE NEXT TIME IT WENT IN THEY SAID IT WAS MUD IN THE WHEELS. 2ND PROMBLEM IS
18	THE UPPER OIL PAN STARTED LEAKING AT 80K, 3RD PROMBLEM THE STAINLESS STEEL
19	BRADED LINE THAT GOES FROM MASTER CYLINDER TO ABS MODULE RUPTURED AND LEFT ME WITH NO BRAKES . ALL OF THIS OVER A COURSE OF ABOUT 89K MILES
20	1 Affected Product
21	
22	December 5, 2018 NHTSA ID NUMBER: 11156425 Components: STEERING, SUSPENSION
23	NHTSA ID Number: 11156425
24	Incident Date December 1, 2018
25	Consumer Location SAN RAMON, CA Vehicle Identification Number 1FT8W3DT2HE****
26	Summary of Complaint
	CRASHNo FIRENo
27	INJURIES0
28	DEATHS0
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	Class Action Complaint Case No.

Cá	ase 3:19-cv	-01082-AJB-AHG	Document 1 Filed 06/10/19 of 353	PageID.241	Page 241
2   2 3   1 4   0	STEERING SOLUTION DEALER A WITNESSE	WENT INTO AN UN WAS TO REDUCE ( ND FORD'S CUSTO D BY AN OFFICIA RENDERED.	27000 MILES. WHILE ON THE FR ICONTROLLABLE VIBRATION ( SPEED TO APPROXIMATELY 10 <u>OMER SERVICE, AND WAS INF</u> L SERVICE TECHNICIAN BEF	DEATH WOBB MPH. <u>CONTA</u> FORMED THA	LE). THE ONLY <u>CTED THE</u> <u>F IT MUST BE</u>
6    7	2.	NHTSA Consume	r Complainants Who Were Told b	oy Defendant Fo	rd's Authorized
8		Dealers that There	e Was Nothing that Could be Done	e to Assist Them	or to Correct
9		the Death Wobble	Problem		
	50.	The following are t	he consumer complaints submitted t	o NHTSA where	the Complainant
0	States that De	efendant Ford's autho	orized dealers stated that there was n	othing they could	l or would do to
	address the D	eath Wobble issue.			
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	Components NHTSA ID I Incident Dat Consumer L Vehicle Iden Summary of CRASHNO FIRENO INJURIESO DEATHSO FRONT ENI DANGEROU IN OPELOU THE DEFECT	D WOBBLES SHAK JS AND COULD CA J <b>SAS, LA. AND AD</b> <u>CT.</u> *NM roduct	AS, LA FTSW21P35E**** ES AND SLIDES ESPECIALLY IN AUSE AN ACCIDENT. <u>DEALER N</u> VISED COULD NOT DO ANYTI	NAME IS BORI	DELON FORD
24 25 1 26 27 28	Components NHTSA ID I Incident Dat Consumer L	<b>NHTSA ID NUMB</b> <b>SUSPENSION</b> <b>Number:</b> 10196519 See July 7, 2007 <b>Socation</b> LA PLATA <b>Stification Number</b> 1 <b>Complaint</b>	, MD FTSW21525E****		
	Class Action	Complaint	-241-		
	Case No.	E			

	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.242 Page 242 of 353
1 2 3 4 5 6 7 8 9 10	INJURIES0 DEATHS0 I HAVE A 2005 F-250 4WD CREW CAB W/5.4 LITER V-8. IN THE LAST YEAR THERE HAS BEEN AN INCREASE IN VIOLENT SHAKING FROM THE FRONT END AFTER HITTING POTHOLES, PATCHES, EXPANSION JOINTS, RAILROAD TRACKS, ETC. AT HIGHWAY SPEEDS. SLOWER SPEEDS ARE JUST ANNOYING BUT AT HIGHER SPEEDS (60 AND UP) THE SHAKES BECOME CONVULSIONS AND THE TRUCK LITERALLY BOUNCES AND SHAKES UNCONTROLLABLY. IT TAKES SLAMMING ON THE BRAKES AND GETTING BELOW 40MPH TO MAKE IT STOP. <u>I TOOK THE TRUCK INTO THE DEALER LAST WEEK</u> (09JULY07) TO HAVE IT LOOKED AT. AFTER BEING IN THERE FOR A DAY AND A HALF THEY SAID THEY COULD FIND NOTHING WRONG WITH IT. THEY SAID THEY LOOKED THROUGH ALL THE TSB'S AND FOUND NOTHING WRONG WITH THE TRUCK. AFTER RESEARCH ON THE INTERNET AND YOUR WEBSITE HERE, IT SOUNDS LIKE EVERYONE IS BEING TOLD THE SAME THING SO I THOUGHT I WOULD ADD MY VOICE TO THE MIX. I AM SOMEWHAT APPREHENSIVE ABOUT DRIVING MY TRUCK BUT RIGHT NOW AM NOT FINANCIALLY ABLE TO TRADE IT IN ON SOMETHING ELSE. *TR 1 Affected Product
<ol> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	August 7, 2007 NHTSA ID NUMBER: 10198762 Components: SUSPENSION NHTSA ID Number: 10198762 Incident Date April 1, 2007 Consumer Location HIGHLANDS RANCH, CO Vehicle Identification Number 1FTCX21575E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F250 SUPER DUTY. HE STATED THAT WHILE DRIVING HIGHWAY SPEEDS THE VEHICLE WOULD BOUNCE AND SHIMMY. <u>THE</u> DEALER STATED THAT THEY HAVE DONE ALL THAT THEY COULD DO. THE FAILURE MILEAGE WAS 18,000 AND THE CURRENT MILEAGE WAS 22,000. THE VIN NUMBER APPEARED TO BE INCORRECT. 1 Affected Product
24 25 26 27 28	March 26, 2008 NHTSA ID NUMBER: 10222348 Components: SUSPENSION NHTSA ID Number: 10222348 Incident Date June 6, 2007 Consumer Location WILMINGTON, DE Vehicle Identification Number 1FTSW21535E**** Summary of Complaint CRASHNo -242- Class Action Complaint
	Class Action Complaint Case No.

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1	
1	FIRENo INJURIESO
2	DEATHS0
3	2005 F-250 HAS DANGEROUS SHAKE IN FRONT END OF VEHICLE, TO THE POINT OF
4	LOOSING CONTROL OF VEHICLE ON HIGHWAY. TRUCK BOUNCED OVER FOUR LANES
4	OF HIGHWAY BEFORE GAINING CONTROL OF IT. SPEED WAS ABOUT 55-60MPH. IT WAS EARLY IN THE MORNING AND THERE WASN'T MUCH TRAFFIC ON THE ROAD. IF IT HAD
5	BEEN IN THE AFTERNOON, THERE WOULD HAVE BEEN A CRASH AND POSSIBLE
6	FATALITIES. <u>I TOOK TRUCK TO DEALER, TECH STATED THEY KNEW ABOUT THE</u>
7	PROBLEM BUT DIDN'T KNOW HOW TO FIX IT, AND THEY WEREN'T GOING TO DO A
7	RECALL BECAUSE IT'S NOT A VERY PUBLIC PROBLEM, SO THEY THREW SOME SHIMS ON IT AND SOME OTHER STUFF. TRUCK STILL HAS A CONSIDERABLE SHAKE
8	TO THE FRONT END. WE RECENTLY TOOK THE TRUCK TO A 'NON' FORD MECHANIC.
9	THREE TIE RODS ARE BAD AND THE STABILIZER SHOCKS ARE BAD. HE STATED THIS IS
10	BECAUSE THE FRONT END IS SHAKING SO BAD IT IS WEARING OUT THE RODS/SHOCKS.
10 11	THE TRUCK IS ONLY THREE YEARS OLD AND THIS SHOULD NOT BE HAPPENING. THE DEALER STATED THEY KNEW ABOUT THE PROBLEM. WHY IS NOTHING BEING DONE TO
	FIX THIS ISSUE? *TR
12	1 Affected Product
13	
14	May 27, 2009 NHTSA ID NUMBER: 10270117
15	Components: SUSPENSION NHTSA ID Number: 10270117
	Incident Date May 10, 2009
16	Consumer Location RED BLUFF, CA
17	Vehicle Identification Number 1FTSW21Y75E****
10	Summary of Complaint
18	CRASHNo FIRENo
19	INJURIES0
20	DEATHS0
	UNPREDICTABLE AND UNCONTROLLABLE SEVERE FRONT END VIBRATION AND
21	OSCILLATION, CAUSING LOSS OF CONTROL OF VEHICLE. OCCURS RANDOMLY AND
22	WITHOUT WARNING, AT FREEWAY SPEEDS. HAS RESULTED IN RUNNING ONTO THE SHOULDER OF THE ROADWAY AND SEVERAL NEAR COLLISIONS WITH OTHER
23	VEHICLES. VEHICLE HAS BEEN INSPECTED AND REPAIRS ATTEMPTED ON SEVERAL
	OCCASIONS. DEALERSHIP ADVISES THAT THIS IS INHERENT TO YEAR, MAKE AND
24	MODEL OF VEHICLE; AND CANNOT REPAIR THE PROBLEM. *TR
25	1 Affected Product
26	
27	January 11, 2008 NHTSA ID NUMBER: 10215018
	Components: STEERING NHTSA ID Number: 10215018
28	Incident Date April 1, 2005
	-243-
	Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.244 Page 244 of 353
1 2 3 4	Consumer Location SHADY SIDE, MD Vehicle Identification Number 1FTNF21535E**** Summary of Complaint CRASHNo FIRENo INJURIES0
5	DEATHS0
6	2005 FORD F-250 WITH STEERING PROBLEMS. CONSUMER STATES THAT THE VEHICLE'S STEERING WHEEL SHAKES SO MUCH THAT THE VEHICLE WILL LEAVE THE ROAD. <b>HE</b>
7	STATES THAT THE DEALER HAS NOT BEEN ABLE TO SOLVE THE STEERING
8	PROBLEM. *KB_THE CONSUMER STATED THE TIRES WERE REPLACED, THE SHOCKS, WHEEL BEARINGS, BRAKES AND FRONT END WERE CHECKED BY THE
	<b>DEALER AND STATED THERE WAS NO PROBLEM.</b> *JB THE CONSUMER STATED THE PROBLEM HAS NOT BEEN RESOLVED. UPDATED.
9	1 Affected Product
10	3 Associated Documents
11	
12	December 17, 2008 NHTSA ID NUMBER: 10252099
13	Components: SUSPENSION NHTSA ID Number: 10252099
14	Incident Date January 1, 2008
15	Consumer Location Unknown Vehicle Identification Number 1FTWW33P05E****
16	Summary of Complaint
17	CRASHNo FIRENo
18	INJURIES0
	<b>DEATHS0</b> TL*THE CONTACT OWNS A 2005 FORD F-350 SUPERDUTY. WHILE DRIVING 50 MPH, THE
19	VEHICLE SHOOK VIOLENTLY. THE ENGINE MUST BE TURNED OFF IN ORDER FOR THE
20	VEHICLE TO STOP SHAKING. <u>THE VEHICLE WAS TAKEN TO THE DEALER THREE</u> TIMES AND THEY REPLACED THE SWAY BAR. THE FAILURE CONTINUED AND THE
21	DEALER STATED THAT THEY COULD NOT DIAGNOSE THE FAILURE. THE
22	MANUFACTURER IS AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 49,000 AND CURRENT MILEAGE WAS 83,000.
23	1 Affected Product
24	
25	January 14, 2009 NHTSA ID NUMBER: 10254941
26	Components: SUSPENSION NHTSA ID Number: 10254941
27	Incident Date January 9, 2009
28	Consumer Location FRANKLIN, TN Vehicle Identification Number 1FTWW31P35E****
	Summary of Complaint
	-244- Class Action Complaint
	Case No.

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.245 Page 245 of 353
1	CRASHNo
	FIRENo
2	INJURIES0
3	DEATHS0 OCCASIONALLY, AT INTERSTATE SPEEDS ONLY (65 - 75 MPH), FRONT END SHAKES
4	VIOLENTLY WHEN CROSSING OVER A SMALL CHANGE IN SURFACE ELEVATION. (FOR
5	EXAMPLE: TRANSITION FROM ROAD SURFACE TO BRIDGE SURFACE) IT IS NOT PREDICTABLE. VEHICLE STEERING IS COMPROMISED AND THE ONLY WAY TO REGAIN
6	PROPER CONTROL IS TO ALLOW THE TRUCK TO SLOW TO APPROXIMATELY 50 MPH
0	WHEN VIOLENT SHAKING WILL SUBSIDE. <u>VEHICLE HAS BEEN INSPECTED BY ONE</u>
7	<b>INDEPENDENT SHOP AND ONE FORD DEALERSHIP (WHERE VEHICLE WAS</b>
8	PURCHASED). NEITHER COULD IDENTIFY THE SOURCE OF THE PROBLEM. TRUCK IS STOCK WITH NO MODIFICATIONS. MOST RECENT EVENTS OCCURRED TWO
9	CONSECUTIVE DAYS TRAVELING INTERSTATE 65 BETWEEN NASHVILLE AND
0	SOUTHERN KENTUCKY. TWO DIFFERENT LOCATIONS, ONE NORTHBOUND AND ONE
1	SOUTHBOUND. *TR 1 Affected Product
2	
	January 5, 2007 NHTSA ID NUMBER: 10177891
3	Components: STEERING
4	NHTSA ID Number: 10177891
5	Incident Date January 4, 2007
5	Consumer Location GLEN BURNIE, MD Vehicle Identification Number 1FTWW33P15E****
6	Summary of Complaint
7	CRASHNo
0	FIRENO
8	INJURIES0
9	<b>DEATHS0</b> TL* - WHEN CONTACTWAS DRIVING AND GOING OVER A SERIES OF SMALL BUMPS
0	LOST CONTROL OF THE STEERING WHEEL WHICH WENT FROM RIGHT TO LEFT
	QUICKLY TO THE POINT OF BEING ALMOST UNCONTROLLABLE. IN ORDER FOR
1	CONTACT TO GET CONTROL OF THE STEERING WHEEL SHE HAD TO SLOW THE VEHICLE
2	DOWN TO A SPEED OF 5 MPH OR COME TO A COMPLETE STOP. <u>THE CONTACT TOOK</u> THE VEHICLE TO THE DEALERSHIP ,AND THEY STATED THAT THEY NOTICED THE
23	SAME INCIDENT AS WELL ON A TEST DRIVE OF THE VEHICLE, BUT THEY COULD
24	<b>NOT DO ANYTHING ABOUT THE INCIDENT BECAUSE THE MANUFACTURER HASN'T</b> <b>GIVING THE DEALERSHIP ANY ADVISE ON HOW TO FIX THE FAILURE.</b> *AK
25	1 Affected Product
26	
	November 15, 2008 NHTSA ID NUMBER: 10248890
7	Components: SUSPENSION, EQUIPMENT
28	NHTSA ID Number: 10248890
	Incident Date July 4, 2005
	-245- Class Action Complaint
	Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.246 Page 246 of 353
1 2 3 4 5	Consumer Location EL CAJON, CA Vehicle Identification Number 1FTWW33P45E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO ON JULY 4, 2005, I PURCHASED A 2005 FORD F350 SUPER DUTY LARIAT WITH LONG BED
6	AND DUAL WHEELS AND 4WD AT EL CAJON FORD. FROM THE BEGINNING, THE TRUCK EXPERIENCED SEVERE FRONT-END VIBRATION WHEN I REACHED ABOUT 60 MPH. IT
7	CONTINUED UNTIL I GOT TO ABOUT 80 MPH. I COMPLAINED ABOUT THIS PROBLEM FROM THE FIRST VISIT FOR SERVICE AT DOWNEY FORD. AFTER A FEW VISITS FOR
8 9	DIAGNOSTICS, DOWNEY FORD INSTALLED A "DAMPENER" ON THE FRONT END. IT MADE THE PROBLEM BETTER, BUT IT DID NOT COMPLETELY CURE THE DEFECT. I
10	EVENTUALLY BOUGHT A LANCE CAMPER, WHICH WAS ON THE TRUCK FOR OVER A YEAR. WHILE THE TRUCK HAD THE 3000 LB CAMPER ON IT, THE VIBRATION WENT
11	AWAY ON THE STRAIGHTAWAY, BUT WAS HORRIBLY DANGEROUS ON THE CURVES. FOR EXAMPLE, ONE SUCH CURVE IS THE 605 SB TO THE 405 SB IN LONG BEACH. I
12	ALMOST LOST CONTROL OF THE VEHICLE/CAMPER ON THIS CURVE UNLESS I ALMOST STOPPED. I REMOVED THE CAMPER ABOUT A YEAR AGO AND THE PROBLEM WITH THE
13	TRUCK IS WORSE. IT NOW WILL VIBRATE UNCONTROLLABLY AT 40-50 MPH. $\underline{I}$
14	<b>REPORTED THIS VIBRATION PROBLEM EVERY TIME I WENT TO THE DEALER FOR</b> <b>SERVICE. THEY ALWAYS SAID THEY DID ALL THEY COULD WITH THE DAMPENER.</b>
15	I TOOK THE TRUCK TO EL CAJON FORD ABOUT 3-4 WEEKS AGO. NOW THAT IT IS OUT OF WARRANTY, FORD NOW SAYS IT CAN FIX THE PROBLEM, BUT IT HAS DAMAGE THE
16	FRONT STEERING MECHANISM. THE SERVICE WRITER SAID IN A VOICE MAIL THAT
17	DOWNEY PUT ON A DAMPER THAT WAS TOO SMALL FOR MY TRUCK. I DEMANDED THEY FIX IT FREE AND THEY REFUSE. I WANT MY TRUCK FIXED. THIS IS A DESIGN
18	DEFECT, SINCE IT HAS EXISTED FROM DAY 1. I HAVE READ ON SEVERAL WEBSITES THAT THIS IS A COMMON PROBLEM THAT EXISTED WELL BEFORE 2005, BUT FORD HAS
19	IGNORED THE SAFETY ISSUES. A HIGH PROBABILITY OF AN ACCIDENT EXISTS WHEN YOUR TRUCK IS VIBRATING AND BOUNCING ACROSS LANES AND YOU CANNOT STEP
20	ON THE BRAKE OR MAKE IT WORSE! THANK YOU, ANNETTE GILLIAM *TR
21	2 Affected Products
22 23	August 30, 2011 NHTSA ID NUMBER: 10422634
23 24	Components: STEERING
24	NHTSA ID Number: 10422634 Incident Date May 28, 2011
26	Consumer Location SHIPPENSBURG, PA Vehicle Identification Number 1FTWW31PX5E****
27	Summary of Complaint
28	CRASHNo FIRENo
	-246-
	Class Action Complaint
	Case No.

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1 2 3 4 5	DEATHS0 TL* THE CONTACT OWNS A 2005 FORD F350. THE CONTACT STATED THAT THE STEERING WHEEL WOULD SHAKE VIOLENTLY. THE VEHICLE WAS TAKEN TO A MECHANIC WHO AS UNABLE TO DIAGNOSE THE FAILURE. <u>THE VEHICLE WAS THEN</u> <u>TAKEN TO THE DEALER WHO ALSO COULD NOT DIAGNOSE THE FAILURE.</u> THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 24,000. 1 Affected Product
6 7 8 9 10	March 17, 2015 NHTSA ID NUMBER: 10694792 Components: STEERING NHTSA ID Number: 10694792 Incident Date March 6, 2015 Consumer Location PONTIAC, MI Vehicle Identification Number 1FTWX31P05E**** Summary of Complaint
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	CRASHNO FIRENO INJURIESO DEATHSO WHEN EVER THIS TRUCK HITS A BUMPY PART OF ROAD (E.G. POT HOLE, CRACK IN PAVEMENT, OR DEBRIS) THE VEHICLE (AND STEERING WHEEL) WILL SHAKE VIOLENTLY BACK AND FORTH FOR SEVERAL SECONDS (4 TO 5 SECONDS) OR UNTIL I SLOW TO SPEEDS AROUND 35MPH OR BELOW. THIS HAPPENS ON A REGULAR BASIS AND HAS HAPPENED SINCE I BOUGHT THE VEHICLE TWO YEARS AGO. THE TIRES ARE LIKE NEW, AND THE FRONT SUSPENSION COMPONENTS HAVE BEEN CHECKED AND DETERMINED TO BE IN GOOD USABLE CONDITION. SEARCHING THE WEB FOR POSSIBLE CAUSES OR FIXES OF THIS ISSUE, <u>I HAVE FOUND THAT MANY OTHER PEOPLE ALSO HAVE THIS SAME PROBLEM, WITH LITTLE TO NO HELP COMING FROM SERVICE REPAIRS AT A DEALERSHIP.</u> *TR 1 Affected Product
<ol> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	June 1, 2009 NHTSA ID NUMBER: 10272506 Components: SUSPENSION NHTSA ID Number: 10272506 Incident Date May 26, 2009 Consumer Location HINESTON, LA Vehicle Identification Number 1FTSW21536E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHS0 TL*THE CONTACT OWNS A 2006 FORD F-250. WHILE DRIVING 65 MPH, THE VEHICLE WOULD SHIMMY WHEN IT DROVE OVER A BUMP IN THE ROAD. <u>THE DEALER COULD</u> -247- Class Action Complaint
	Case No.

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1 2 3	<b>NOT PROVIDE A REMEDY; THEREFORE, THE VEHICLE COULD NOT BE REPAIRED.</b> THE CONTACT FEELS THAT A CRASH COULD OCCUR ONE DAY. THE CURRENT MILEAGE WAS 74,000 AND FAILURE MILEAGE WAS 32,000. <b>1 Affected Product</b>
4 5 6 7 8 9 10 11 12 13 14 15 16 17	May 24, 2011 NHTSA ID NUMBER: 10402591 Components: SUSPENSION NHTSA ID Number: 10402591 Incident Date May 21, 2011 Consumer Location LAUREL, MD Vehicle Identification Number 1FTSX215X6E**** Summary of Complaint CRASHNo FIRENO INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2006 FORD F-250. THE CONTACT WAS DRIVING APPROXIMATELY 60 MPH AND DROVE OVER A POT HOLE WHEN THE ENTIRE VEHICLE BEGAN TO VIBRATE VIOLENTLY AND CAUSED THE DRIVER TO ALMOST LOSE CONTROL OF THE VEHICLE. THE FAILURE WAS EXPERIENCED ON AN INTERMITTENT BASIS. <u>THE VEHICLE WAS TAKEN TO THE DEALER WHERE THEY ADVISED HIM</u> <b>THAT THEY WERE UNABLE TO DIAGNOSE THE FAILURE. THE MANUFACTURER</b> WAS CONTACTED AND THEY OFFERED NO ASSISTANCE. THE FAILURE MILEAGE WAS APPROXIMATELY 15,000. 1 Affected Product
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	December 30, 2011 NHTSA ID NUMBER: 10441780 Components: SUSPENSION NHTSA ID Number: 10441780 Incident Date December 18, 2007 Consumer Location NAPA, CA Vehicle Identification Number 1FTSW21P26E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2006 FORD F-250. THE CONTACT WAS DRIVING 60 MPH OVER A ROAD BUMP WHEN THE VEHICLE BEGAN TO SHAKE VIOLENTLY. <u>THE CONTACT</u> TOOK THE VEHICLE TO THE DEALER FOR A DIAGNOSTIC TEST BUT THE DEALER WAS UNABLE TO DEFECT THE CAUSES OF THE FAILURE. THE MANUFACTURER SUGGESTED ADDING FRONT DAMPERS TO THE VEHICLE BUT THE VEHICLE WAS ALREADY EQUIPPED WITH STOCK DAMPERS THAT DID NOT NEED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE CONTACT WAS CONCERNED WITH THE -248- Class Action Complaint Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.249 Page 249 of 353
1 2 3	POSSIBILITY OF LOSING CONTROL OF THE VEHICLE WHEN THE FAILURE OCCURRED. THE FAILURE MILEAGE WAS 62,000. <b>1 Affected Product</b>
4	February 20, 2014 NHTSA ID NUMBER: 10565061
5	Components: WHEELS, SUSPENSION, STEERING
6	NHTSA ID Number: 10565061 Incident Date February 19, 2014
7	Consumer Location JOHNS CREEK, GA
8	Vehicle Identification Number N/A Summary of Complaint
	CRASHNo
9	FIRENo INJURIES0
10	DEATHS0
11	WHILE DRIVING MY 2006 FORD F250 FX4, AT SPEEDS BETWEEN 45-65 MPH, A SLIGHT VIBRATION IS FELT. WITHIN A FEW SECONDS IT TURN INTO A VIOLENT SHAKING
12	MOTION AS IF I'M DRIVING ON LARGE COBBLE STONES. IT HAS BEEN SO BAD I HAVE
13	ALMOST LOST CONTROL ON THE HIGHWAY AND CAME WITHIN INCHES OF HITTING ANOTHER VEHICLE. WHEN IT STARTS THERE IS NO STOPPING IT, AS THE STEERING
14	WHEEL JERKS VIOLENTLY. FORD HAS SENT A LETTER OUT THAT SAY INFLATE YOUR TIRES AND IF IT STILL HAPPENS SLOW DOWN UNTIL IT STOPS. THAT'S NOT RIGHT. THIS
15	IS DANGEROUS. I HAVE TO SLOW DOWN TO 30 MPH FOR IT TO STOP. I CAN'T DO THAT
16	ON THE HIGHWAY. <u>THE DEALERS AND FORD SAY THERE IS NOTHING THEY WILL</u> DO. THIS ISSUE IS EXTREMELY DANGEROUS DUE TO FORDS ENGINEERING MISHAP.MY
17	TIRES ARE STOCK, ROTATED, BALANCED, AND ALIGNED, THIS HAPPENS AT LEAST
18	ONCE EVERY OTHER WEEK 2005-2013 F250,350 OWNERS REPORT THE SAME ISSUE. GOOGLE: FORD DEATH WOBBLE, AND WATCH THE F250 AT CRUISING SPEED. *TR
19	1 Affected Product
20	
21	April 15, 2009 NHTSA ID NUMBER: 10265460
22	Components: STEERING NHTSA ID Number: 10265460
	Incident Date January 15, 2006
23	Consumer Location Unknown Vehicle Identification Number 1FTNF21506E****
24	Summary of Complaint
25	CRASHNo FIRENo
26	INJURIES0
27	<b>DEATHS0</b> THE SHIMMY ISSUE ON MY 2006 FORD 250 PICK UP HAS NEVER BEEN RESOLVED. <b>I</b>
28	SPENT APPROX 6 MONTHS WORKING WITH THE DEALERSHIP TO TRY TO RESOLVE
	THE ISSUE . THEY EVENTUALLY TOLD ME THEY HAVE DONE EVERYTHING THAT -249-
	Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.250 Page 250 of 353
1 2 3 4 5 6	<b>FORD TOLD THEM TO DO</b> . THIS VERY DANGEROUS PROBLEM STILL EXISTS. I RECEIVED A LETTER FROM FORD THAT THE PROBLEM WAS RELATED TO TIRE PRESSURE. THAT IS ABSOLUTELY NONSENSE. AFTER THE SECOND SET OF FRONT TIRES BEFORE 10000 MILES THEY STARTED TO CUP SEVERELY AFTER 1000 MILES. <u>I TOOK IT</u> <b>BACK AND THEY PUT NEW TIRES ON ALL THE WAY AROUND. AND THEN I WAS</b> <b>TOLD THERE WAS NOTHING ELSE THAT COULD BE DONE.</b> THE SHIMMY IS SO SEVERE AT TIMES IT WILL ACTUALLY SHIMMY ACROSS THE CENTER LINE. *TR <b>1 Affected Product</b>
7 8 9 10 11	April 7, 2014 NHTSA ID NUMBER: 10577858 Components: STEERING NHTSA ID Number: 10577858 Incident Date May 2, 2011 Consumer Location OREFIELD, PA Vehicle Identification Number 1FTSX21536E**** Summary of Complaint
<ol> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> </ol>	CRASHNO FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2006 FORD F250. THE CONTACT STATED THAT THERE WAS AN EXTREME VIBRATION IN THE STEERING WHEEL. THE CONTACT DROVE OVER A BUMP OR UNEVEN PAVEMENT WHILE DRIVING THE VEHICLE AT ANY SPEED AND HAD TO USE FORCE IN ORDER TO GAIN CONTROL OF THE STEERING WHEEL ON MULTIPLE OCCASIONS. THE VEHICLE SHOOK VIOLENTLY AND THE STEERING CONTINUED TO BE UNSTABLE. <u>THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHO WAS</u> <u>UNABLE TO DIAGNOSE THE FAILURE.</u> THE CONTACT CONTINUED TO EXPERIENCE THE STEERING FAILURE WHICH CAUSED THE VEHICLE TO DRIVE ROUGH. <u>THE</u> <u>VEHICLE WAS TAKEN BACK TO AN AUTHORIZED DEALER WHO WAS UNABLE TO</u> <u>REPLICATE THE FAILURE.</u> THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 50000. 1 Affected Product
22 23 24 25 26 27 28	February 14, 2008 NHTSA ID NUMBER: 10218089 Components: SUSPENSION NHTSA ID Number: 10218089 Incident Date February 13, 2008 Consumer Location PRIOR LAKE, MN Vehicle Identification Number 1FTSW21596E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 -250-
	Class Action Complaint Case No.

¢	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.251 Page 251 of 353
1 2 3 4 5 6	THERE EXISTS A FACTORY FAULT IN THE FORD SUPERDUTY TRUCK. THERE IS WHAT IS CALLED A DEATH WOBBLE THAT OCCURS ON ROUGHER ROADS WHEN TRAVELING 60 MILES PER HOUR OR UNDER. THE FRONT END WILL SHAKE VIOLENTLY AND UNCONTROLLABLY WHEN A BUMP IS HIT. <u>I HAVE HAD IT IN TO FORD DEALERSHIPS</u> <u>7+ TIMES FOR THIS AND THEY WILL NOT FIX OR REPLACE THE FAULTY PARTS.</u> I HAVE STARTED A WEB LOG ON AOL REGARDING THIS AND AM ATTACHING THE LINK . HTTP://WWW.TOPIX.NET/FORUM/AUTOS/FORD-F-250-SUPER- DUTY/T0SGDCTMOBHE5JER1 THERE ARE OVER 170 SIMILAR COMPLAINTS REGARDING THE SAME PROBLEM. FORD DENIES THE PROBLEM EXISTS. IT WILL KILL SOMEONE SOON, IT HAS ALMOST CASED 4 ACCIDENTS WITH MY TRUCK. *TR
7 8	1 Affected Product
° 9	June 6, 2008 NHTSA ID NUMBER: 10230092
0	Components: SUSPENSION
1	NHTSA ID Number: 10230092 Incident Date May 19, 2008
	Consumer Location COLLEGEVILLE, PA
2	Vehicle Identification Number 1FTSX21596E**** Summary of Complaint
3	CRASHNo
4	FIRENo
5	INJURIES0 DEATHS0
6 7	SINCE NEW THE TRUCK HAS EXPERIENCED VIOLENT AND UNCONTROLLABLE FRONT SUSPENSION SHAKING/BOUNCING/WOBBLING AFTER HITTING A SHARP BUMP AT HIGHWAY SPEEDS. INITIALLY, THE SHAKING WOULD ONLY LAST APPROXIMATELY 3 SECONDS, BUT RECENTLY THE SHAKING WAS SO SEVERE THAT I HAD TO SLOW THE
8 9	VEHICLE TO 30-35 MPH BEFORE IT STOPPED. THE SHAKING WAS SO VIOLENT THAT I WAS CONVINCED THAT SOMETHING HAD BROKEN IN THE FRONT SUSPENSION, AND I
0	IMMEDIATELY INSPECTED THE FRONT SUSPENSION AT THE NEXT EXIT. NOTHING OBVIOUSLY BROKEN WAS EVIDENT. I SEARCHED THE INTERNET AND DISCOVERED
1	THAT THIS IS A COMMON AND DANGEROUS PROBLEM WITH THESE TRUCKS. <b>I</b>
	<b>DROPPED THE TRUCK OFF AT THE DEALER. THEY ACKNOWLEDGED THEIR</b> AWARENESS OF THE PROBLEM, BUT CLAIMED THEY WERE UNABLE TO DUPLICATE
2	IT DURING THEIR ROAD TEST. THIS IS NOT SURPRISING, AS IT TYPICALLY ONLY
3	OCCURS WHEN YOU HIT A SHARP BUMP OR SERIES OF BUMPS AT HIGHWAY SPEEDS.
4	THEY PERFORMED SOME OF THE REPAIRS/ADJUSTMENTS SPECIFIED BY FORD'S TSB 07- 10-10, BUT THE PROBLEM PERSISTS. THERE IS A SERIOUS AND DANGEROUS PROBLEM
5	WITH A LARGE POPULATION OF FORD TRUCKS THAT MUST BE ADDRESSED BY FORD
	AT THIS POINT, I HOPE THAT NHTSA CAN CONVINCE FORD TO CORRECT THE PROBLEM
5 7	BEFORE SOMEONE IS NEEDLESSLY KILLED. *TR 1 Affected Product
3	June 23, 2008 NHTSA ID NUMBER: 10231992 -251-
	Class Action Complaint
	Case No.

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1 2 3 4 5 6 7 8 9 10 11 12 13 14	Components: SUSPENSION, STEERING NHTSA ID Number: 10231992 Incident Date October 10, 2006 Consumer Location VICTORVILLE, CA Vehicle Identification Number 1FTSW21P66E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I HAVE AN '06 FORD F-250. EVERYTIME I HIT A BUMP IN THE ROAD OR FREEWAY THE FRONT END DOES WHAT'S KNOWN AS THE "DEATH SHAKE" ACCORDING TO RESEARCH ON THE INTERNET. MANY OF PEOPLE ARE COMPLAINING OF THE SAME EXPERIENCE THE MORE I DID RESEARCH ON THIS MATTER. MINE ALONG WITH EVERYONE ELSE HAS TO SLOW DOWN ALMOST TO A STOP FOR THE FRONT END TO STOP SHAKING OR IT WILL SEND YOU INTO THE ONCOMING LANE AND ALL HAVE HAD VERY CLOSE CALLS. FORD DEALER SHIPS TO MY KNOWLEDGE ACCORDING TO MY LOCAL DEALER SHIP (SUNLAND FORD) IN VICTORVILLE DOESN'T KNOW THE FIX., THEY TOLD ME IT WAS MY STEERING DAMPENER. NOPE!! PEOPLE ARE GOING TO THEIR DEALERSHIPS MULTIPLE TIMES. I PAID WELL OVER \$30,000 FOR MY TRUCK AND THIS IS VERY UNACCEPTABLE. THANKS FOR YOUR TIME AND ATTENTION TO THIS MATTER. *TR 1 Affected Product
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	July 29, 2008 NHTSA ID NUMBER: 10236342 Components: STEERING, SUSPENSION NHTSA ID Number: 10236342 Incident Date June 19, 2008 Consumer Location DRUMS, PA Vehicle Identification Number 1FTSX21506E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I OWN A 2006 F250 SD WITH 8000 MILES ON IT AND I CANT DRIVE IT AND FEEL SAFE ANYMORE. EVERYTIME I DRIVE ON ANY UNEVEN PAVEMENT OVER 50 MILES PER HOUR THE STEERING WHEEL IS OSCILLATING SO BADLY I HAVE TO SLAM ON THE BRAKES TO REGAIN CONTROL. IT IS SHAKING SO BADLY I HAVE TO SLAM ON THE BRAKES TO REGAIN CONTROL. IT IS SHAKING SO BADLY THE PASSENGER SIDE DOOR FLEW OPEN THE LAST TIME IT HAPPENED AND ALMOST HIT A VEHICLE PARKED ALONG THE ROADWAY. <u>THE DEALERSHIP HAS NO CLUE WHAT IS THE PROBLEM.</u> I SPENT OVER 37000 FOR THIS TRUCK AND NOW WHAT. I FEEL UNSAFE IN IT AND IT IS JUST A MATTER OF TIME BEFORE THE THING BREAKS THE WAY IT IS SHAKING. IT WILL PROBABLE TAKE ME WRECKING TO GET IT FIXED. *TR 1 Affected Product
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1 2 3 4 5 6 7 8 9 10 11 12	July 21, 2009 NHTSA ID NUMBER: 10277579 Components: SUSPENSION, STEERING NHTSA ID Number: 10277579 Incident Date July 17, 2009 Consumer Location CHESAPEAKE, VA Vehicle Identification Number 1FTSW21566E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WHILE DRIVING A 2006 F250 SUPER DUTY XL 4X4 ON I-40 THE VEHICLE BEGAN TO SHAKE VIOLENTLY AT 70 MPH. THIS OCCURRED AFTER DRIVING OVER A BRIDGE. THE VEHICLE SHOOK SO VIOLENTLY IT WAS HARD TO MAINTAIN CONTROL AND BRING IT TO A STOP. AFTER THIS INCIDENT IT ALSO OCCURRED THROUGHOUT THE REMAINDER OF THE TRIP. <u>APPARENTLY THIS HAS HAPPENED TO OTHER DRIVERS OF THIS</u> VEHICLE SINCE IT IS A COMPANY OWNED VEHICLE. AND SEVERAL DEALERS HAVE ATTEMPTED TO REPAIR THIS PROBLEM TO NO AVAIL. *TR
12	1 Affected Product
<ol> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	April 2, 2010 NHTSA ID NUMBER: 10323451 Components: SERVICE BRAKES, HYDRAULIC, SUSPENSION NHTSA ID Number: 10323451 Incident Date June 1, 2008 Consumer Location MIAMI, FL Vehicle Identification Number 1FTSW21PX6E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2006 FORD F-250 SUPERDUTY. WHILE DRIVING AT APPROXIMATELY 50 MPH ON AN UNEVEN ROAD, THE STEERING WHEEL BEGAN SHAKING. THE CONTACT WAS ALSO UNABLE TO SLOW THE VEHICLE DOWN SINCE WHEN THE BRAKE PEDAL WAS DEPRESSED, IT WOULD RELEASE. <u>THE VEHICLE WAS</u> TAKEN TO AN AUTHORIZED DEALERSHIP BUT NO REPAIRS WERE PERFORMED WHEN THE COMPLAINT WAS FILED. THE FAILURE MILEAGE WAS APPROXIMATELY 38,000. THE CURRENT MILEAGE WAS APPROXIMATELY 97,000. 1 Affected Product
27	February 11, 2013 NHTSA ID NUMBER: 10497697 Components: STEERING, SUSPENSION
28	<b>NHTSA ID Number:</b> 10497697
	-253- Class Action Complaint
	Case No.

0	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.254 Page 254 of 353
1	Incident Date December 1, 2012
2	Consumer Location MONTICELLO, FL Vehicle Identification Number 1FTSW21P46E****
3	Summary of Complaint
4	CRASHNo FIRENo
5	INJURIES0
6	<b>DEATHS0</b> FRONT END WOBBLE AT SPEEDS BETWEEN 40-50 MPH AFTER DRIVING OVER BUMPS. NO
7	REPAIRS HELP THE CONDITION, FRONT END ALIGNMENT, WHEEL
8	BALANCING/TOTATION OR NEW TIRES. PROPER TIRE INFLATION. <u>FORD DEALER IS</u> <u>AWARE OF CONDITON AND REPAIRS BUT WONT PROVIDE ANY OTHER ASSISTANCE.</u>
9	*TR 1 Affected Product
10	October 1, 2009 NHTSA ID NUMBER: 10286002
11	Components: STEERING
12	NHTSA ID Number: 10286002 Incident Date October 1, 2009
13	Consumer Location ALEDO, IL
14	Vehicle Identification Number 1FTNF215X6E****
15	Summary of Complaint CRASHNo
16	FIRENo
	INJURIES0 DEATHS0
17	WHILE DRIVING MY 2006 FORD F250 SUPER DUTY APPROX. 55MPH I HIT A BUMPY PART
18	OF THE ROAD WHICH PUT THE VEHICLE IN AN UNCONTROLLABLE SHAKE. I WAS ABLE
19	TO GET THE TRUCK STOPPED WITHOUT DAMAGE BUT HAD NO CONTROL OVER THE VEHICLE AND COULD ONLY BRAKE. HAD I BEEN IN A CORNER I DON'T THINK THERE IS
20	ANY WAY I COULD HAVE STAYED ON THE ROAD. <u>I CALLED THE FORD DEALER IN</u>
21	DAVENPORT IOWA AND WAS TOLD IT IS CALLED THE DEATH SHAKE AND THERE WAS NO KNOWN CAUSE FOR IT. I WILL GO AHEAD AND TAKE THE VEHICLE IN TO THE
22	DEALER BUT HAVE NO CONFIDENCE IN THEM FIXING ANYTHING. I RECEIVED A
23	LETTER FROM FORD STATING LOW TIRE PRESSURE COULD CAUSE THIS BUT MY TIRES WERE FINE. THERE WAS ALSO A PASSENGER WITH ME WHO HAS VERY SCARED WE
24	WERE GOING TO WRECK. *TR
	1 Affected Product
25	
26	January 26, 2012 NHTSA ID NUMBER: 10445440 Components: STEERING
27	NHTSA ID Number: 10445440
28	Incident Date May 2, 2011
	Consumer Location Unknown -254-
	Class Action Complaint
	Case No.

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1 2 3 4 5 6 7 8	Vehicle Identification Number 1FTSX21516E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT STATED THAT THE VEHICLE WOULD VIOLENTLY WOBBLE WHILE DRIVING AT HIGHWAYS SPEEDS. <u>THE</u> DEALER ATTEMPTED TO REPAIR THE VEHICLE, BUT THE FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED, BUT DENIED ANY ASSISTANCE WITH REPAIRS. THE FAILURE MILEAGE WAS 37,000 AND THE CURRENT MILEAGE WAS 47,600. 1 Affected Product
9 0 1 2 3 4 5 6 7 8 9	December 31, 2013 NHTSA ID NUMBER: 10558024 Components: STEERING NHTSA ID Number: 10558024 Incident Date July 19, 2007 Consumer Location IMPERIAL, CA Vehicle Identification Number 1FTSW21P86E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2006 FORD F-250 SD WITH 95,000 MILES. THE CONTACT STATED WHILE DRIVING AT HIGHWAY SPEEDS OF 55 MPH OR FASTER THE VEHICLE WOULD SHAKE VERY VIOLENTLY. <u>THE VEHICLE WAS TAKEN TO THE DEALER BUT</u> <u>THEY WERE UNABLE DIAGNOSE THE FAILURE OR REPAIR THE PROBLEM.</u> 1 Affected Product
6 7	July 14, 2011 NHTSA ID NUMBER: 10412372 Components: STEERING, SUSPENSION NHTSA ID Number: 10412372 Incident Date July 14, 2011 Consumer Location PORT ORANGE, FL Vehicle Identification Number N/A Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 2006 FORD F350 EXPERIENCE EXTREMELY VIOLENT SHAKING WHEN DRIVING 45 PLUS MPH AND HIT ANY TYPE BUMP. SHAKING IS SO VIOLENT STEERING IS NOT CAPABLE AND BRAKING ONLY MAKES SHAKING WORSE. <u>I'VE CONTACTED DEALER AND THEY</u> -255- Class Action Complaint
25 26 27 28	CRASHNO FIRENO INJURIESO DEATHSO 2006 FORD F350 EXPERIENCE EXTREMELY VIOLENT SHAKING WHEN DRIVING 45 PLU MPH AND HIT ANY TYPE BUMP. SHAKING IS SO VIOLENT STEERING IS NOT CAPABL AND BRAKING ONLY MAKES SHAKING WORSE. <u>I'VE CONTACTED DEALER AND TH</u> -255-

0	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.256 Page 256 of 353
1 2 3 4	SAID THEY REPLACED A BUSHING BUT PROBLEM PERSISTED. THEY HAVE NOT CORRECTED THE PROBLEM. VEHICLE IS BASICALLY OUT OF CONTROL WHEN THIS HAPPENS. LAST DATE OF OCCURRENCE IS JULY 14,2011 AND THIS PROBLEM HAS PERSISTED SINCE TRUCK WAS PURCHASED NEW FROM DEALER. TRUCK HAS NO LIFT AND IS STOCK MODEL. PLEASE HELP! *TR 1 Affected Product
5	
6	January 18, 2016 NHTSA ID NUMBER: 10820797 Components: ELECTRONIC STABILITY CONTROL, SUSPENSION, STEERING
7	NHTSA ID Number: 10820797
8	Incident Date August 8, 2015
_	Consumer Location SANDWICH, MA
9	Vehicle Identification Number 1FTWW31566E****
0	Summary of Complaint CRASHNo
1	FIRENO
2	INJURIES0 DEATHS0
	FORD F-350 2006 COMPLAINT. WE HAVE EXPERIENCED VIOLENT SHAKING (SHIMMYING)
3	WHEN THE TRUCK HITS A BUMP ON THE HIGHWAY AND AS A RESULT, EXTREME
4	DIFFICULTY MAINTAINING THE VEHICLE ON THE ROAD. OUR FIRST EXPERIENCE WAS
_	IN AUGUST 2015, ON THE INTERSTATE HIGHWAY WHILE TRAVELLING AT 75MP. WE HIT
5	A BUMP AND THE TRUCK / STEERING WHEEL SHOOK VIOLENTLY FOR ABOUT 10 SECONDS CAUSING US TO SWERVE ACROSS LANES AND STRUGGLE TO KEEP THE
6	TRUCK IN THE LANE AND OUT OF TRAFFIC'S WAY. WE HAVE SINCE EXPERIENCED THIS
7	PROBLEM FOUR MORE TIMES HITTING BUMPY HIGHWAYS AT SPEEDS AS LOW AS
	50MMP AND AS RECENT AS 2 WEEKS AGO. WE HAVE CHECKED IT OUT AND OUR
8	MECHANIC ADVISED THAT HE COULD NOT FIND ANYTHING WRONG. IT HAS BEEN A
9	GREAT CONCERN OF OURS AS IT PUTS OUR LIVES (AND THOSE ON THE ROAD WITH US)
	AT DANGER WHEN THIS ISSUE OCCURS. ADDITIONALLY, EVERY TIME THE VIOLENT
0	SHAKING OCCURS, IT THROWS OFF THE ALIGNMENT AND BALANCING FOR THE TRUCK. WE HAVE JUST RECEIVED A LETTER FROM FORD ADVISING OF THIS PROBLEM AND
21	I HAVE CALLED THE SERVICE CENTER FROM THE FORD DEALER WE BOUGHT THE
	VEHICLE FROM. FORD IS NOT ASSUMING RESPONSIBILITY FOR ANY DIAGNOSIS OR
22	<b>REPAIRS TO THESE DEFECTS AT THIS TIME.</b> OUR TIRE PRESSURE IS IN KEEPING WITH
3	FORD'S RECOMMENDATIONS AS THEY SUGGEST IN THEIR LETTER. FORD F-350 TRUCKS
1	SHOULD NOT BE APPROVED FOR USE ON HIGHWAYS AS THIS DEFECT COULD RESULT
4	IN FATAL ACCIDENTS IF THE SHAKING CANNOT BE CONTROLLED. ALSO, FORD SHOULD
5	BE RESPONSIBLE FOR REPAIRING THE FAULTY TRUCKS.  1 Affected Product
6	
7	May 26, 2016 NHTSA ID NUMBER: 10871068
8	Components: SUSPENSION, STEERING
.0	NHTSA ID Number: 10871068
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	Class Action Complaint
	Case No.

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1	Incident Date May 20, 2016 Consumer Location SANDWICH, MA
2	Vehicle Identification Number 1FTWW31566E****
3	Summary of Complaint CRASHNo
4	FIRENo INJURIES0
5	DEATHS0
6	FORD F-350 2006 OSCILLATION I HAVE FILED A PREVIOUS COMPLAINT BEFORE RE THE VIOLENT OSCILLATION THAT HAPPENS WITH OUR FORD F-350 TRUCK. WE HAVE HAD
7	MORE EVENTS AT SLOWER SPEEDS AND THE SHAKING IS ALMOST UNMANAGEABLE
8	NOW. WEDNESDAY MAY 11 APPROX 1PM EXITING THE BOURNE BRIDGE MA. I WAS DRIVING AT APPROX 40MPH AND EXITING THE BRIDGE. THERE WAS A ROUGH
9	CONSTRUCTION PATCH ON THE ROAD RIGHT WHERE THE ROAD CONNECTS TO THE
10	BRIDGE. AS I HIT THE ROUGH PATCH, THE OSCILLATION BEGAN AND THE TRUCK SHOOK UNCONTROLLABLY APPROACHING THE ROTARY. THERE WAS A LOT OF
11	TRAFFIC AND CARS IN THE LANE BESIDE ME THAT COULD HAVE BEEN DAMAGED.
12	MAY 20, 2016 AT APPROX 5PM. MY HUSBAND WAS DRIVING WEST ON HIGHWAY ROUTE 6, CAPE COD MA AT APPROX 55MPH. AS HE PASSED EXIT 6, HE HIT A ROUGH PATCH
13	AND THE TRUCK BEGAN OSCILLATING VIOLENTLY. HE WAS UNABLE TO CONTROL IT
	AND SWERVED IN BOTH LANES OF THE WESTERLY 2-LANE HIGHWAY ALSO RUBBING AGAINST THE CURB. LUCKILY THE TRAFFIC STOPPED WHEN SEEING HIS TRUCK OUT OF
14	CONTROL AND NO ONE WAS HURT OTHER THAN MY HUSBAND BEING TOTALLY
15	SHAKEN. THE TIRES HAVE BEEN INFLATED AS RECOMMENDED BY FORD WHEN THE SENT A LETTER RE THIS DEFECT. THIS TRUCK IS DANGEROUS, NOT ONLY TO US BUT
16	OTHERS WHO ARE ON THE ROAD. I HAVE CONTACTED THE PLYMOUTH FORD
17	DEALER WHERE THE TRUCK WAS PURCHASED, FORD CUSTOMER SERVICE AND FORD HEAD OFFICE. EVEN THOUGH THEY ACKNOWLEDGE THE TRUCKS ARE
18	DEFECTIVE, THEY SAY THEY ARE NOT RESPONSIBLE FOR REPAIRING THEM. OUR
19	TRUCK IS OSCILLATING REALLY BADLY AND IS DANGEROUS TO DRIVE. THIS SHOULD BE A RECALL, NOT ONLY FOR THOSE OF US DRIVING THESE DEFECTIVE FORD F-350
20	2006 TRUCKS, BUT FOR THE OTHER INNOCENT LIVES ON THE ROAD.
21	1 Affected Product
22	
23	May 26, 2008 NHTSA ID NUMBER: 10228887 Components: STEERING
23	NHTSA ID Number: 10228887
	Incident Date May 10, 2008 Consumer Location SHADOW HILLS, CA
25	Vehicle Identification Number N/A
26	Summary of Complaint CRASHNo
27	FIRENo
28	INJURIES0 DEATHS0
	-257-
	Class Action Complaint
	Case No.

¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.258 Page 258 of 353
1 2 3 4 5 6	06 F350 DUALLY DIESEL CREW CAB. WHEN DRIVING ANYWHERE BETWEEN 50-70 MPH AND HIT A POTHOLE THE FRONT END GOES INTO A DEATH WOBBLE AND IS NOT CONTROLLED UNTIL VEHICLE IS SLOWED TO 30 MPH. ALMOST LOST CONTROL OF VEHICLE ON LOS ANGELES FREEWAYS. <u>HAS HAPPENED MULTIPLE TIMES AND HAVE</u> <u>BEEN TO FORD DEALER WITH NO ASSISTANCE.</u> LAST EPISODE WAS LAST WEEK, THEN MY INSURANCE CO TOLD ME TO FILE COMPLAINT IN CASE OF ACCIDENT THAT IS NOT MY FAULT BUT A VEHICLE DEFECT. AAA ALSO SENT ME TO THIS FORUM OF OTHER FORD OWNERS THAT HAVE HAD THE SAME COMPLAINT. *TR <b>1 Affected Product</b>
7 8 9 10	March 28, 2008 NHTSA ID NUMBER: 10222609 Components: SUSPENSION NHTSA ID Number: 10222609 Incident Date May 3, 2007 Consumer Location Unknown
11 12 13	Vehicle Identification Number 1FTWW31P26E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO
<ol> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> </ol>	<b>DEATHS0</b> TL*THE CONTACT OWNS A 2006 FORD F-350 SD. WHILE DRIVING 50 MPH, THE FRONT END OF THE VEHICLE BEGINS TO JUMP AND BOUNCE BACK AND FORTH. THE FAILURE USUALLY OCCURS FROM A BRIDGE TO PAVEMENT, FROM PAVEMENT TO A BRIDGE, ON UNEVEN PAVEMENT, OR IN VARIOUS OTHER DRIVING CONDITIONS. <u>THE DEALER</u> <u>COULD NOT DUPLICATE THE FAILURE.</u> THE PURCHASE DATE WAS UNKNOWN. THE CURRENT MILEAGE WAS 44,000 AND FAILURE MILEAGE WAS 21,977. <b>1 Affected Product</b>
19	
20 21	July 9, 2009 NHTSA ID NUMBER: 10276278 Components: SUSPENSION, STEERING NHTSA ID Number: 10276278
22	Incident Date September 15, 2008 Consumer Location BOGART, GA
23	Vehicle Identification Number N/A Summary of Complaint
24	CRASHNo FIRENo
25	INJURIES0
26 27	<b>DEATHS0</b> TL*THE CONTACT OWNS A 2006 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 65
27	MPH, THE STEERING VIBRATED AND WOBBLED EXCESSIVELY. IN ADDITION, THE FRONT END OF THE VEHICLE BEGAN TO SHIMMY. THERE WERE NO WARNING INDICATORS ILLUMINATED ON THE INSTRUMENT PANEL. IMMEDIATELY, THE DRIVER -258-
	Class Action Complaint
	Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.259 Page 259 of 353
1 2 3 4 5 6	PULLED THE VEHICLE OVER. <u>SHE DROVE TO AN AUTHORIZED DEALER, BUT THEY</u> <u>COULD NOT DUPLICATE THE FAILURES. THE VEHICLE WAS TAKEN BACK TO AN</u> <u>AUTHORIZED DEALER AND AN INDEPENDENT MECHANIC ON SEPARATE</u> <u>OCCASIONS FOR IDENTICAL FAILURES, BUT THERE WERE NO RESOLUTIONS.</u> <u>CURRENTLY</u> , THE AUTHORIZED DEALER IS REPLACING THE STEERING STABILIZER SHOCK AND DRAG LINK. THE VIN WAS UNABLE TO BE ENTERED INTO THE SYSTEM. THE FAILURE MILEAGE WAS 65,000 AND CURRENT MILEAGE WAS 87,000. <b>1 Affected Product</b>
7 8 9 10 11 12 13 14 15 16 17 18	May 21, 2012 NHTSA ID NUMBER: 10459147 Components: SUSPENSION NHTSA ID Number: 10459147 Incident Date August 8, 2008 Consumer Location READING, PA Vehicle Identification Number 1FDWW31P96E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 THE VEHICHE WHEN TRAVELING AT HIGHWAY SPEEDS IN EXCESS OF 55 MPH WHEN HITTING A BUMP BEGINS TO SHAKE WHICH GROWS TO A VOILENT SHAKING. IN ORDER TO STOP THIS SHAKING THE VEHICLE MUST BE SLOWED UNDER 25 MPH. THIS HAS HAPPENED ON NUMEROUS OCCASIONS BETWEEN THE DATE ABOVE AND TODAY. REPEATED SERVICE VISITS TO A LOCAL FORD DEALERSHIP SERVICE CENTER HAVE BEEN UNABLE TO CORRECT THE PROBLEM. *TT 1 Affected Product
<ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	April 20, 2009 NHTSA ID NUMBER: 10266161 Components: STEERING NHTSA ID Number: 10266161 Incident Date June 22, 2008 Consumer Location PIQUA, OH Vehicle Identification Number 1FTWW33P46E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 I BOUGHT MY TRUCK USED WITH 20K MILES ON IT IN 2007 AND DID NOT HAVE ANY PROBLEMS WITH THE FRONT END SHAKING AND THE STEERING WHEEL SHAKING VIOLENTLY TILL ABOUT 37K WHEN I TOOK IT TO THE LOCAL FORD DEALERSHIP TO GET IT CHECKED OUT. MY TRUCK STEERING WHEEL AND FRONT END STARTS SHAKING AT ABOUT 40 MPH AND GETS REAL BAD AT ABOUT 55 MPH AND REALLY BAD SLOWING -259- Class Action Complaint Case No.

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1	DOWN IN THAT SAME RANGE. <u>ANY TIME I'VE HAD REPAIRS DONE BY THE</u> DEALERSHIP THE REPAIRS DONE TO MY TRUCK ON THE INVOICES STATE THE
2	DEALERSHIP VERIFIED COMPLAINT AND THEN HOW THEY FIXED THE PROBLEM
3	BUT WHEN I TOOK MY TRUCK IN FOR THIS PROBLEM MY INVOICE READS MY
4	<u>COMPLAINT AND THEN "NO REPAIR ATTEMPTED". THEY SAID THEY COULD NOT</u> DUPLICATE THE PROBLEM SO THEY DID NOT REPAIR ANYTHING BUT ACCORDING
5	TO THE INVOICE THEY DID NOT EVEN LOOK AT IT BECAUSE IT DOESN'T SAY THEY
3	EVEN TRIED TO VERIFY MY COMPLAINT IT JUST SAYS "NO REPAIR ATTEMPTED".
6	SO EACH MILE I HAVE PUT ON THE TRUCK TILL NOW THE PROBLEM HAS BEEN GETTING WORSE. BEFORE THE STEERING WHEEL WOULD SHAKE AFTER HITTING A
7	BUMP IN THE ROAD OR POT HOLE BUT NOW IT DOES IT JUST DRIVING JUST ABOUT
8	EVERYTIME IT GETS TO 40 MPH AND DEFINITELY AROUND 50-55 MPH. SOMETIMES IT
9	SHAKES TO WHERE I CAN SLOW DOWN AND IT GOES AWAY AND OTHER TIMES IT SHAKES SO BAD I HAVE TO STOP AND HOW SAFE IS THAT ON INTERSTATE WITH MY
9 10	WIFE AND 2 DAUGHTERS. I'VE HAD A COUPLE AUTO SHOPS LOOK AT MY TRUCK AND THEY SAID I NEEDED NEW TIRES AND AN ALIGNMENT. SO I NEEDED THEM ANYWAY SO
11	I TOOK IT AND GOT ALL "6"(DUALLY)NEW TIRES PUT ON AND AN ALIGNMENT AND
12	THEY SAID EVERYTHING ELSE WAS TIGHT AND GOOD IN THE FRONT END BUT I STILL HAVE THE PROBLEM. I TOOK IT TO ANOTHER SHOP AND HAD THE FRONT END
	CHECKED AND THEY SAID EVERYTHING WAS GOOD AND TIGHT. MY TRUCK NOW HAS
13	48K SO I CALLED MY FORD DEALERSHIP AGAIN AND THEY SAID THEY WOULD HAVE
14	TO GET IT IN AND DO A LONG STEP-BY-STEP LIST OF PROCEDURES AND CHECKS TO VERIFY THE PROBLEM BUT IT WILL COST CAUSE MY TRUCK IS OUT OF WARRANTY
15	NOW. I HAVE NOT TAKEN IT IN YET. \$\$\$\$\$\$ *TR
16	1 Affected Product
-	
17	September 13, 2013 NHTSA ID NUMBER: 10543396
18	Components: STEERING, SUSPENSION
19	NHTSA ID Number: 10543396
20	Incident Date September 12, 2013 Consumer Location EL PASO, TX
20	Vehicle Identification Number 1FTSW21P77E****
21	Summary of Complaint
22	CRASHNo
23	FIRENo INJURIES0
	DEATHSO
24	I HAVE A 2007 F 250 DIESEL AND EVERY TIME I AM DRIVING OVER SPEED BUMP AT
25	45MPH TO 65MPH MY TRUCK SHAKES LIKE CRAZY <u>IT HAS BEEN TAKEN TO THE</u> DEALER FOR A FIX BUT NOTHING IS DONE I AM AFRAID THAT ONE DAY THIS WILL
26	COST AN ACCIDENT I HOPE THE THIS MATER IS TAKEN CARE SOON THANK YOU FOR
	YOUR HELP. *TR
27	1 Affected Product
28	
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	Class Action Complaint
	Case No.

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1 2	June 11, 2009 NHTSA ID NUMBER: 10273581 Components: STEERING, TIRES NHTSA ID Number: 10273581
3	Incident Date June 11, 2009
4	Consumer Location HAMMOND, LA Vehicle Identification Number 1FTSW21P27E****
5	Summary of Complaint
6	CRASHNo FIRENo
_	INJURIES0
7	<b>DEATHS0</b> WHEN DRIVING MY FORD F-250 45 MPH AND OVER AND HITTING ANY KIND OF BUMP
8 9	THE FRONT END SHAKES SEVERELY. THE BRAKES WHEN APPLIED WILL STOP THE SHAKING. THE DAMPER WAS REPLACED BUT IT DID NOT HELP. IF THE BUMP AND THE
-	SPEED WAS GREAT ENOUGH IT WOULD CAUSE YOU TO CRASH. THE TRUCK HAS 38,000
10	MI. AND THE DEALER TELLS ME THERE IS NO RECALL AND IT IS NOT UNDER WARRANTY. I PLAN ON TAKING IT TO AN INDEPENDENT FRONT END SPECIALIST TO
1	DIAGNOSE THE PROBLEM.
2	2 Affected Products
13	
14	August 23, 2010 NHTSA ID NUMBER: 10351350
	Components: STEERING
15	NHTSA ID Number: 10351350
16	Incident Date July 23, 2008
. –	Consumer Location FRESNO, CA Vehicle Identification Number 1FTSX21577E****
17	Summary of Complaint
18	CRASHNo
	FIRENO
19	INJURIES0
20	DEATHS0
	TL* THE CONTACT OWNS A 2007 FORD F-250. WHILE DRIVING APPROXIMATELY 60 MPH,
21	THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE FAILURE WOULD RECUR
22	INTERMITTENTLY. THE VEHICLE WAS SERVICED BY AN AUTHORIZED DEALER ON
	NUMEROUS OCCASIONS WHERE THE GEAR BOX AND STEERING COLUMN WERE
23	<b>REPLACED. THE FAILURE CONTINUED TO RECUR INTERMITTENTLY AND THE</b>
24	VEHICLE WAS TAKEN BACK TO THE AUTHORIZED DEALER. THE DEALER WAS
	UNABLE TO DIAGNOSE THE FAILURE. THE FAILURE CONTINUED TO RECUR WHEN DRIVING BETWEEN 40-60 MPH. THE VEHICLE WAS NOT FURTHER REPAIRED. THE
25	FAILURE MILEAGE WAS 26,000 AND THE CURRENT MILEAGE WAS 60,000.
26	1 Affected Product
27	
,,	December 14, 2011 NHTSA ID NUMBER: 10439970
28	Components: STEERING, SUSPENSION
	-261-
	Class Action Complaint
	Case No.

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1 2 3 4 5 6 7 8 9	NHTSA ID Number: 10439970 Incident Date June 17, 2011 Consumer Location Unknown Vehicle Identification Number 1FTSW21P87E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 PICKED UP MY F250 SUPER DUTY FROM THE SERVICE AT THE FORD DEALER, DRIVING IT ON THE FREEWAY OVERPASS, HIT A BUMP ON THE OVER PASS AND MY FRONT END STARTED SHAKING VIOLENTLY. I HAD NO CONTROL, I HAD TO STOP ON THE FREEWAY TO MAKE IT STOP SHAKING, ALMOST CAUSED A PILE UP. <u>CALLED THE DEALER AND</u> THEY SAID THEY'VE HEARD OF THE PROBLEM BUT NOTHING THEY CAN DO. *TR 1 Affected Product
10 11 12 13	May 28, 2013 NHTSA ID NUMBER: 10513794 Components: STEERING, WHEELS, STRUCTURE, SUSPENSION NHTSA ID Number: 10513794 Incident Date May 26, 2013
14 15	Consumer Location AUSTIN, TX Vehicle Identification Number 1FTSW21537E**** Summary of Complaint
16 17	CRASHNo FIRENo INJURIESO
18 19	<b>DEATHS0</b> I WOULD LIKE TO OFFICIALLY SUBMIT A COMPLAINT ABOUT OUR FORD F250 SUPER DUTY TRUCK. THERE IS SOMETHING SERIOUSLY WRONG WITH IT AND THE FORD DEAL EDSUID HAS DEEN UNABLE TO FIX IT. WE HAVE HAD THE SAME ISSUE WITH IT
20 21	DEALERSHIP HAS BEEN UNABLE TO FIX IT. WE HAVE HAD THE SAME ISSUE WITH IT FOR THE LAST FEW YEARS AND THE ISSUE HAS NOT BEEN RESOLVED! WE ARE EXPERIENCING TURBULENT WOBBLING WITH THIS TRUCK AND I CAN ASSURE YOU
21 22	THIS IS NOT NORMAL! THE LAST INCIDENT OCCURRED 2 DAYS AGO ON MAY 26, 2013! I HAVE CHILDREN AND FEEL THAT OUR LIVES WERE ESPECIALLY IN DANGER WHEN WE RODE IN THIS TRUCK AS WE THOUGHT THIS ISSUE WAS RESOLVED AND NO LONGER
23	EXISTED. AS WE WERE DRIVING ON THE INTERSTATE HIGHWAY WE DROVE OVER AN UNEVEN SECTION OF THE HIGHWAY AND OUR TRUCK SUDDENLY STARTED SHAKING
24 25	DANGEROUSLY OUT OF CONTROL! THANKFULLY MY HUSBAND WAS ABLE TO CONTROL THE STEERING WHEEL AND STEPPED ON THE BRAKE TO SLOW IT DOWN,
26	OTHERWISE WHO KNOWS WHAT WOULD HAVE HAPPENED! THERE WAS TRAFFIC EVERYWHERE AND WE WERE LUCKY ENOUGH NOT TO HAVE AN ACCIDENT! THEN IT
27	HAPPENED AGAIN A FEW HOURS LATER WHEN WE AGAIN DROVE OVER AN UNEVEN SECTION OF THE INTERSTATE. I HAVE EXPERIENCED ENOUGH OF THESE THREATENING
28	EPISODES AND I AM VERY CONCERNED AS THIS IS ABSOLUTELY NOT NORMAL AND I CAN HONESTLY SAY THERE IS SOMETHING VERY WRONG WITH THIS VEHICLE. THIS IS
	-262- Class Action Complaint
	Case No.

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1 2 3 4 5	A SAFETY ISSUE AND PEOPLE CAN AND WILL LOSE THEIR LIVES OVER THIS IF THIS IS NOT RESOLVED IMMEDIATELY! <u>I HAVE CONTACTED FORD HEADQUARTERS TO</u> <u>SUBMIT A FORMAL COMPLAINT AND THEY MERELY TOLD ME TO CONTINUE</u> <u>WORKING WITH THE DEALERSHIP THAT HAS UNRESOLVED MY ISSUE.</u> I TRUST THAT YOU WILL TAKE THIS COMPLAINT SERIOUSLY AS LIVES ARE AT STAKE BECAUSE OF THIS ISSUE. *TR 1 Affected Product
6 7 8 9 10	December 6, 2012 NHTSA ID NUMBER: 10487532 Components: STEERING NHTSA ID Number: 10487532 Incident Date December 15, 2009 Consumer Location STEVENSVILLE, MD Vehicle Identification Number N/A
10 11 12 13 14 15 16	Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2007 FORD F-250 SD. WHILE DRIVING APPROXIMATELY 65 MPH, THE VEHICLE BEGAN TO SHAKE VIOLENTLY AS THE CONTACT TRAVELED OVER AN UNEVEN ROAD SURFACE. <u>THE VEHICLE WAS TAKEN TO THE DEALER WHERE</u> <u>THE FAILURE COULD NOT BE REPLICATED.</u> THE VEHICLE WAS NOT REPAIRED. THE VIN WAS NOT AVAILABLE. THE APPROXIMATE FAILURE MILEAGE WAS 30,000. 1 Affected Product
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	December 8, 2010 NHTSA ID NUMBER: 10369701 Components: SUSPENSION NHTSA ID Number: 10369701 Incident Date November 12, 2010 Consumer Location HEMET, CA Vehicle Identification Number 1FTWW31P77E**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHS0 I HAVE A 2007 F-350 HARLEY DAVIDSON CC AT HIGHWAY SPEEDS MOSTLY IN CORNERS BUT ALSO ON STRAIGHTAWAY, THE TRUCK STARTS SHAKE VIOLENTLY, ALMOST UNCONTROLLABLE. TO GET THIS TO STOP, I HAVE TO SLOW WAY DOWN AND ALMOST
27 28	STOP. THIS PROBLEM HAS BEEN REPORTED TO THE DEALER, WHERE THEY REPLACED SOME OF THE FRONT STEERING COMPONENTS. I WAS TOLD THAT THE PROBLEM WAS FIXED, BUT ABOUT 100 MILES DOWN THE ROAD, THE SHAKING STARTED AGAIN. I SUBSEQUENTLY CALLED THE DEALER, WHO INFORMED ME -263- Class Action Complaint Case No.

¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.264 Page 264 of 353
1 2 3 4 5 6 7 8 9	THAT THERE WAS NOTHING ELSE THAT THEY COULD DO, AS THE TRUCK IS NOW OUT OF WARRANTY. THIS PROBLEM WAS REPORTED, AND SUPPOSEDLY FIXED PRIOR TO THE WARRANTY RUNNING OUT. I HAVE SPOKEN TO OTHER PEOPLE WITH SIMILAR ISSUES WITH THEIR TRUCKS. THE SEVERITY OF THE SHAKING IN THE STEERING WHEEL MAKES IT ALMOST IMPOSSIBLE TO CONTROL SAFELY. I FEEL VERY UNSAFE DRIVING THIS VEHICLE, AND WOULD LIKE FOR SOMEONE AT FORD TO LET ME KNOW WHAT I CAN DO TO FIX THIS PROBLEM. I DON'T AGREE THAT FORD WILL DO NOTHING ABOUT THIS PROBLEM, EVEN THOUGH THERE HAVE BEEN MANY COMPLAINTS OF THE SAME NATURE, HOWEVER I JUST WANT MY TRUCK FIXED. WHETHER OR NOT I HAVE TO PAY FOR IT, I JUST WANT SOMEONE TO TELL ME HOW TO FIX THIS PROBLEM. THERE HAVE BEEN NO MODIFICATIONS, AND THE TIRES ON MY TRUCK HAVE BEEN SUPPLIED BY THE DEALER. *TR 1 Affected Product
10	Max 12, 2010 NHTSA ID NUMBED, 10220254
11	May 13, 2010 NHTSA ID NUMBER: 10330354 Components: TRACTION CONTROL SYSTEM, STEERING
12	NHTSA ID Number: 10330354 Incident Date February 1, 2010
	Consumer Location PAULINE, SC
13	Vehicle Identification Number 1FTSX21YX8E****
14	Summary of Complaint CRASHNo
15	FIRENo
16	INJURIES0 DEATHS0
17	TL*THE CONTACT OWNS A 2008 FORD F250 SUPER DUTY. THE CONTACT STATED THAT
18	WHILE DRIVING AT 70 MPH OVER AN UNEVEN SURFACE, THE FRONT END OF THE VEHICLE WOULD SHAKE AND VIBRATE. THE STEERING AND TRACTION CONTROL ALSO
	FAILED. UPON DECELERATION THE FAILURE WOULD STOP. THE PROBLEM OCCURRED
19	THREE TIMES. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALERSHIP BUT
20	THE DEALER COULD NOT DUPLICATE THE FAILURE. THE DEALER INFORMED THE OWNER THAT SOME OF THIS YEAR AND MODEL HAD THE "DEATH SHAKE" BUT
21	THERE WAS NOTHING THEY COULD DO ABOUT IT; SHE WAS ADVISED TO NOT
22	<b>DRIVE THE VEHICLE.</b> THE FAILURE MILEAGE WAS APPROXIMATELY 15,000. THE CURRENT MILEAGE WAS APPROXIMATELY 24,000.
23	1 Affected Product
24	
	March 17, 2009 NHTSA ID NUMBER: 10262107
25	Components: STEERING
26	NHTSA ID Number: 10262107
27	Incident Date June 10, 2008 Consumer Location Unknown
28	Vehicle Identification Number 1FDWW35R08E****
	Summary of Complaint
	-264- Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.265 Page 265 of 353
1	CRASHNo
2	FIRENo
	INJURIES0 DEATHS0
3	TL*THE CONTACT OWNS A 2008 FORD F-350 SD. THE CONTACT STATED THAT THE
4	FRONT END OF THE VEHICLE WOULD SHIMMY AND SHAKE WHILE DRIVING
5	APPROXIMATELY 50 MPH. ON ONE OCCASION, THE STEERING WHEEL SHOOK SO SEVERELY THAT HE LOST CONTROL OF THE VEHICLE AND VEERED OFF THE ROAD.
6	THERE WERE NO INJURIES. THE CONTACT TOOK THE VEHICLE AND VEEKED OFF THE ROAD.
_	REPAIRS, BUT THE FAILURE PERSISTED. HE FILED A COMPLAINT WITH THE
7	MANUFACTURER, BUT HAS YET TO RECEIVE ANY FEEDBACK. THE CURRENT MILEAGE WAS APPROXIMATELY 42,600 AND FAILURE MILEAGE WAS APPROXIMATELY
8	15,000.
9	1 Affected Product
10	
11	March 3, 2010 NHTSA ID NUMBER: 10316308
12	Components: STEERING NHTSA ID Number: 10316308
	Incident Date January 2, 2009
13	Consumer Location SAN BERNARDINO, CA
14	Vehicle Identification Number 1FTWW33R68E**** Summary of Complaint
15	CRASHNo
16	FIRENO
	INJURIES0 DEATHS0
17	I HAVE A 2008 FORD F-350 DUALLY THAT WHEN HITTING A DIP/BUMP IN THE ROAD AT
18	SPEEDS ABOVE ABOUT 35, THE ENTIRE FRONT END SHAKES/SHIMMYS SO BAD THAT
19	YOU CAN'T EVEN CONTROL IT! <u>I RECEIVED A LETTER IN THE MAIL FROM FORD IN</u> APRIL 2009 BASICALLY SAYING WHEN IT HAPPENS SLOW DOWN. THE DEALER
20	<b>REFUSES TO DO ANYTHING.</b> SOMEONE IS GOING TO GET KILLED IF THIS IS NOT FIXED.
21	*TR
	1 Affected Product
22	
23	March 28, 2013 NHTSA ID NUMBER: 10504817
24	Components: SUSPENSION, STEERING NHTSA ID Number: 10504817
25	Incident Date February 6, 2012
	Consumer Location Unknown
26	Vehicle Identification Number 1FTSW215X9E**** Summary of Complaint
27	CRASHNo
28	FIRENO
	-265-
	Class Action Complaint
	Case No.

¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.266 Page 266 of 353
1 2 3 4 5 6 7 8	DEATHS0 TL* THE CONTACT OWNS A 2009 FORD F-250. THE CONTACT STATED THAT THE FRONT END OF THE VEHICLE WOULD SHAKE VIOLENTLY WHENEVER DRIVING OVER A ROAD BUMP OR A POTHOLE. THE WHEELS WOULD ALSO BOUNCE OFF THE GROUND AND THE STEERING WOULD BECOME DEFECTIVE WHEN THE FAILURE OCCURRED. ONCE THE VEHICLE WAS AT A COMPLETE STOP, THE FAILURE WOULD CEASE. <u>THE VEHICLE WAS</u> <u>TAKEN TO THE DEALER WHERE THE TIRE PRESSURE AND ALIGNMENT WAS</u> <u>CHECKED, BUT THE DEALER DID NOT RECOMMEND ANY TYPE OF REPAIR.</u> THE FAILURE MILEAGE WAS 70,000 AND THE CURRENT MILEAGE WAS 137,000. *TR UPDATED 07/16/13*LJ 1 Affected Product 1 Associated Document
<ol> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	March 2, 2015 NHTSA ID NUMBER: 10691517 Components: SUSPENSION NHTSA ID Number: 10691517 Incident Date November 24, 2012 Consumer Location TORRINGTON, WY Vehicle Identification Number 1FTSW21Y89E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2009 FORD F-250 SD. UPON TRAVELING OVER 65 MPH, THE VEHICLE SHOOK VIOLENTLY AND VEERED TO THE LEFT AND RIGHT. THE CONTACT HAD TO MERGE TO THE SIDE OF THE ROAD DUE TO THE FAILURE. <u>THE VEHICLE WAS</u> TAKEN TO AN AUTHORIZED DEALER WHO PERFORMED AN ALIGNMENT. THE CONTACT INDICATED THAT A FEW YEARS LATER, THE FAILURE RECURRED. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHO WAS NOT ABLE TO DUPLICATE OR DIAGNOSE THE FAILURE. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND WAS UNABLE TO DETERMINE A REMEDY. THE FAILURE MILEAGE WAS NOT AVAILABLE. 1 Affected Product
23 24 25 26 27 28	December 30, 2015 NHTSA ID NUMBER: 10817038 Components: VISIBILITY/WIPER, STEERING, SUSPENSION NHTSA ID Number: 10817038 Incident Date December 11, 2015 Consumer Location SATSUMA, AL Vehicle Identification Number 1FTSW21R79E**** Summary of Complaint CRASHNo FIRENo -266-
	-266- Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.267 Page 267 of 353
1 2 3 4 5 6 7 8 9	INJURIES0 DEATHS0 DRIVING 2009 FORD F-50 SUPER DUTY FX4 ON INSTERSTATE AT 65 MPH, AS I EXITED TO ANOTHER INTERSTATE I EXPERIENCED A VIOLENT WOBBLE IN THE FRONT END WHICH ONLY STOPPED WHEN I BROUGHT THE PICKUP TRUCK TO A COMPLETE STOP. <u>I TOOK</u> THE TRUCK TO THE DEALER I PURCHASED THE VEHICLE FROM AND THEY GAVE ME A SHOPPING LIST OF \$3300. THIS INCLUDED WINDSHIELD WIPERS. THEY ALSO DID NOT KNOW WHAT CAUSED THIS PROBLEM. FORD CUSTOMER SERVICE SAID THEY DID NOT KNOW OF THIS PROBLEM AND COULD NOT HELP. LOOKING INTO THIS ON GOOGLE, I FOUND HUNDREDS OF SIMILAR PROBLEMS COMMONLY CALLED "DEATH WOBBLE" ON THE INTERNET. THIS VIOLENT SHAKING HAS OCCURRED ONCE MORE TWO WEEKS LATER. I AM PARKING THE VEHICLE UNTIL I DECIDE WHAT I NEED TO DO. I AM AFRAID FOR MY FAMILY'S SAFETY AND OTHER MOTORISTS. *JS 1 Affected Product
<ol> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	June 2, 2016 NHTSA ID NUMBER: 10872235 Components: STEERING, SUSPENSION NHTSA ID Number: 10872235 Incident Date March 10, 2016 Consumer Location BIGELOW, AR Vehicle Identification Number 1FTSW21R69E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2009 FORD F-250 SD. THE CONTACT STATED THAT THE FRONT END OF THE VEHICLE WAS UNSTABLE SHOOK AND VIBRATED EXCESSIVELY WITH AN EXTREME WOBBLE. <u>THE DEALER WAS NOTIFIED OF THE FAILURE AND</u> WAS UNABLE TO PROVIDE A REPAIR SOLUTION TO PREVENT THE FAILURE. THE CONTACT TOOK THE VEHICLE TO MORE THAN FIVE DIFFERENT REPAIR SHOPS FOR VARIOUS REPAIRS, BUT THE FAILURES CONTINUED IN THE FRONT AND REAR ENDS. THE VEHICLE WAS NOT REPAIRED AND THE CONTACT WAS WAITING TO DETERMINE IF THE MANUFACTURER WOULD BE ABLE TO PROVIDE A PERMANENT REPAIR SOLUTION. THE APPROXIMATE FAILURE MILEAGE WAS 180,000. 1 Affected Product
24 25 26 27 28	July 21, 2014 NHTSA ID NUMBER: 10614915 Components: STEERING NHTSA ID Number: 10614915 Incident Date March 8, 2011 Consumer Location Unknown Vehicle Identification Number 1FTSW21R19E**** Summary of Complaint -267- Class Action Complaint Case No.

0	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.268 Page 268 of 353
1 2 3 4 5 6 7 8	CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2009 FORD F-250. THE CONTACT STATED WHILE DRIVING OVER A BUMP AT APPROXIMATELY 65 MPH, THE VEHICLE BEGAN SHAKING AND SWERVED INTO ANOTHER LANE. THE FAILURE RECURRED NUMEROUS TIMES. <u>THE VEHICLE WAS TAKEN TO A DEALER. THE TECHNICIAN WAS UNABLE TO</u> <u>DUPLICATE OR DIAGNOSE THE FAILURE.</u> HOWEVER, ALL FOUR TIRES WERE REPLACED ON FOUR OCCASIONS. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 40,000. 1 Affected Product
<ol> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> </ol>	March 10, 2016 NHTSA ID NUMBER: 10845889 Components: SUSPENSION NHTSA ID Number: 10845889 Incident Date February 2, 2015 Consumer Location SILVER CITY, NM Vehicle Identification Number 1FTSW2BR0AE**** Summary of Complaint CRASHNo FIRENo
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2010 FORD F-250 SD. THE CONTACT STATED THAT WHILE DRIVING AT ANY SPEED OVER 20 MPH, THE VEHICLE WOULD EXPERIENCE SEVERE FRONT END VIBRATING AND SHAKING. <u>THE VEHICLE WAS TAKEN TO THE DEALER</u> <u>BUT THE CAUSE OF THE FAILURE WAS NOT DETERMINED.</u> THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 30,000. 1 Affected Product
21 22 23 24 25 26 27 28	April 11, 2016 NHTSA ID NUMBER: 10854925 Components: SUSPENSION NHTSA ID Number: 10854925 Incident Date January 15, 2015 Consumer Location KATHLEEN, GA Vehicle Identification Number 1FTSW2BRXAE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHS0 TL* THE CONTACT OWNS A 2010 FORD F-250. THE CONTACT DROVE OVER A SLIGHT BUMP AT 70 MPH AND THE VEHICLE BEGAN TO VIBRATE SEVERELY. THE FAILURE -268-
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1 2 3 4	OCCURRED CONSTANTLY. <u>THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS</u> <u>DIAGNOSED, BUT THE CAUSE OF THE FAILURE WAS NOT FOUND. THE VEHICLE</u> <u>WAS NOT REPAIRED.</u> THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 100,000. 1 Affected Product
5 6 7	April 26, 2012 NHTSA ID NUMBER: 10456617 Components: STEERING NHTSA ID Number: 10456617
7 8 9	Incident Date November 1, 2011 Consumer Location Unknown Vehicle Identification Number 1FTSW2BR1AE**** Summary of Complaint
10	CRASHNo FIRENo INJURIES0
11 12	DEATHS0 TL* THE CONTACT OWNS A 2010 FORD F-250 SD DIESEL. THE CONTACT STATED THAT
13	WHEN DRIVING AT VARIOUS SPEEDS OVER A ROAD BUMP, THE FRONT END OF THE VEHICLE AND THE STEERING WHEEL WOULD JERK VIOLENTLY. <u>THE VEHICLE WAS</u>
14 15	TAKEN TO THE DEALER WHO WAS UNABLE TO DIAGNOSE THE FAILURE. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE VEHICLE WAS NOT
15 16	<b><u>REPAIRED.</u></b> THE FAILURE MILEAGE WAS 58,000 AND THE CURRENT MILEAGE WAS 64,000. <b>1 Affected Product</b>
17	
18 19	January 6, 2015 NHTSA ID NUMBER: 10670511 Components: STEERING
20	NHTSA ID Number: 10670511 Incident Date September 17, 2014
21	Consumer Location GARDEN RIDGE, TX Vehicle Identification Number 1FTSW2BRXAE**** Summary of Complaint
22 23	CRASHNo FIRENo
24	INJURIES0 DEATHS0
25	AT VARIOUS SPEEDS FROM 45 ON UP FRONTEND WILL SHAKE VIOLENTLY CAUSING VEHICLE TO LOSS LANE CONTROL. MOST OFTEN IT IS FOLLOWING ANY COMPROMISE
26 27	IN THE ROAD BUT HAS HAPPENED WITHOUT ME FEELING OR SEEING ANY CHANGE IN THE SURFACE. WHEN I WENT TO MY LOCAL FORD DEALER, THEY QUICKLY
28	IDENTIFIED THE PROBLEM CALLING IT THE €œDEATH WOBBLE€•. ALARMED BY THE NAME ALONE I ENQUIRED. THEY SAID THEY KNOW OF THE PROBLEM AND
	THAT FORD IS NOT TAKING RESPONSIBILITY FOR IT. THEY ONLY OFFER THE -269-
	Class Action Complaint Case No.

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ENGINEERED FRONTEND. T MANY WRECKS AND THE G WHOEVER ELSE TURNS A B RIGHT NEXT TO GM AND TH THEY PRESENT A COMPROM PEOPLE WHO HAVE DONE T ONGOING ISSUE FOR YEARS REMEDY ANY AND ALL CU	POCKET FOR AFTERMARKET P. HIS IS A SERIOUS OCCURRENCE REAT POTENTIAL FOR FATALIT LIND EYE TO THIS SITUATION T IEIR ATTEMPT TO PRETEND ANI AISE IN SAFETY. THERE IS A COU HEIR PART TO NOTIFY BOTH FO S AND BOTH SEEM NEGLIGENT I RRENT VEHICLES WITH THIS DE IOULDN€™T TAKE BLOODSHE & DEFECTIVE PRODUCT.	AND WILL EN IES. I SEE FOR O BE IN THE H D BURY ISSUE UNTLESS NUM ORD AND NHTS NOT TO AGGR FECT, AS WEL	ID UP CAUSING D AND IEADLINES S KNOWING IBER OF SA OF THIS ESSIVELY L AS, ANY
September 10, 2015 NHTSA ID	NUMBER: 10763032		
<b>Components: STEERING, WH</b>	IEELS, SUSPENSION		
NHTSA ID Number: 10763032			
Incident Date October 20, 2012 Consumer Location MEMPHI	S TN		
Vehicle Identification Number	·		
Summary of Complaint			
CRASHNo			
FIRENo			
INJURIES0			
DEATHSO			
	RIVING ON BUMPY SECTION OF NT END. IT SEEM TO AMPLIFY I	,	
	G UNTIL I WAS ABLE TO SLOW T		
	OULDER OF THE ROAD TO REGA		
	HE DEALER 3 TO 4 TIMES FOR		
	IE FORD SERVICE TECHNICIAL		
	A FOR THIS MAKE AND MODE		
	AKE RESPONSIBILITY FOR TH		
	IMENDED FIX, WHICH I FOUNI		
	<u>DN'T EXIST.</u> I HAVE SPENT THO IS OBVIOUSLY A DESIGN AND M		
	S VEHICLE TO DRIVE. WE BOUG		
	OT HAVE CONFIDENCE IN THE		
	A DEFECTIVE TRUCK, WE ARE		
TRUCK FOR THE PURPOSE V	VE INTENDED. WE COULD NOT I	BE MORE DISA	PPOINTED IN
	IESE TRUCKS WILL CAUSE FATA	,	
	VIDEO FROM THE CAB OF THE		
	SE, PLEASE TAKE ACTION TO G	ET THIS ISSUE	FIXED.
THANK YOU *TR 1 Affected Product			
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1	January 24, 2012 NHTSA ID NUMBER: 10445092
2	Components: STEERING, SUSPENSION
3	NHTSA ID Number: 10445092 Incident Date January 1, 2012
4	Consumer Location BIRMINGHAM, AL
5	Vehicle Identification Number N/A
6	Summary of Complaint CRASHNo
	FIRENO
7	INJURIES0 DEATHS0
8 9	THIS VEHICLE HAS SEVERE FRONT END WOBBLE WHICH MOSTLY OCCURS BETWEEN THE SPEEDS OF 55 - 70 MPH. THE STEERING WHEEL AND ENTIRE VEHICLE BEGINS TO
10	VIOLENTLY WOBBLE SO MUCH THAT USUALLY THE VEHICLE HAS TO BE STOPPED ON THE SIDE OF THE ROAD TO STOP THE WOBBLE. THE COVER ON THE DASH OVER THE
11	PASSENGER AIRBAG HAS CRACKED DUE TO THE VIOLENT SHAKING IN THE TRUCK.
12	ALSO, FLUID HAS BEGUN TO LEAK FROM THE FRONT PASSENGER WHEEL AS A RESULT OF THE SHAKING AS WELL <b>. BOTH FORD AND THE DEALERSHIP HAS BEEN UNABLE</b>
12	TO OFFER ANY REMEDY. PLEASE HELP WITH THIS SITUATION. I HAVE VIDEOS IF
	NEEDED. I AM AFRAID THIS IS GOING TO CAUSE AN ACCIDENT. *TR 1 Affected Product
14	
15	June 24, 2012 NHTSA ID NUMBER: 10462887
16	Components: STEERING, SUSPENSION
17	NHTSA ID Number: 10462887 Incident Date June 24, 2012
18	Consumer Location LAKELAND, FL
19	Vehicle Identification Number 1FT7W2B63BE****
20	Summary of Complaint CRASHNo
	FIRENo
21	INJURIES0 DEATHS0
22	AT HIGH SPEEDS OVER 50 MPH, IF TRUCK HITS A BUMP, FRONT END SHAKES
23	VIOLENTLY UNTIL YOU COME TO A COMPLETE STOP. <b>DEALER HAS NO ANSWER.</b> ON INTERNET MANY OTHERS HAVING SAME PROBLEM. CALLED "DEATH RATTLE". *TR
24	1 Affected Product
25	
26	November 30, 2012 NHTSA ID NUMBER: 10486566
27	Components: SUSPENSION
28	NHTSA ID Number: 10486566 Incident Date November 1, 2012
	Consumer Location SHREVEPORT, LA
	-271- Class Action Complaint
	Case No.

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1	Vehicle Identification Number 1FT7W2B6XBE**** Summary of Complaint
2	CRASHNo
3	FIRENo INJURIES0
4	DEATHSO
5	TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE
	DRIVING AT HIGHWAYS SPEEDS, DRIVING OVER A BUMP THE VEHICLE STARTED TO
6	SHAKE VIOLENTLY. <u>THE VEHICLE WAS TAKEN TO THE DEALER WHO WAS UNABLE</u> <u>TO DIAGNOSE THE FAILURE.</u> THE MANUFACTURER WAS NOT MADE AWARE OF THE
7	FAILURE. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 40,000 AND
8	THE CURRENT MILEAGE WAS 45,000. <b>1 Affected Product</b>
9	
10	July 21, 2013 NHTSA ID NUMBER: 10526016
11	Components: STEERING, WHEELS, SUSPENSION
	NHTSA ID Number: 10526016
12	Incident Date July 4, 2013 Consumer Location DALLAS, TX
13	Vehicle Identification Number N/A
14	Summary of Complaint CRASHNo
15	FIRENo
16	INJURIES0
	<b>DEATHS0</b> I HAVE HAD REPEATED ISSUES WITH THE STEERING OF MY TRUCK. <b>I HAVE TAKEN IT</b>
17	IN TO THE FORD DEALERSHIP FOR THE LAST 2 YEARS AND HAVE BEEN UNABLE TO
18	GET THIS RESOLVED. THE ISSUE IS KNOWN AS THE "DEATH WOBBLE". I WAS
19	UNAWARE OF HOW COMMON THIS ISSUE WAS UNTIL I STARTED READING FORMS WHERE MANY PEOPLE HAVE HAD THE SAME COMPLAINT. I HAVE NEARLY LOST
20	CONTROL OF MY TRUCK WAY TOO MANY TIMES. *TR
21	1 Affected Product
22	
	March 27, 2014 NHTSA ID NUMBER: 10575179
23	Components: STEERING, WHEELS, SUSPENSION NHTSA ID Number: 10575179
24	Incident Date February 10, 2014
25	Consumer Location NORTON, VA
26	Vehicle Identification Number 1FT7X2B61BE**** Summary of Complaint
27	CRASHNo
	FIRENO
28	INJURIES0 DEATHS0
	-272-
	Class Action Complaint
	Case No.

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1 2 3 4 5 6 7	TRUCK DEVELOPED A VIOLENT SHAKE IN THE FRONT END AND BECAME UNCONTROLLABLE. HAVE TO STOP IMMEDIATELY BEFORE VEHICLE WILL STOP SHAKING. THE ISSUE IS REFERRED TO THE "FORD DEATH WOBBLE" WITH MANY RECORDED INSTANCES OF THIS ON THE WEB AND YOUTUBE. ISSUE HAS GOTTEN WORSE AND IS UNSAFE TO DRIVE. <u>HAS BEEN IN THE FORD DEALER AND MANY NEW</u> <u>PARTS REPLACED BUT PROBLEM PERSIST. FORD DEALER CANNOT SEEM TO</u> <u>CORRECT</u> SO IT HAS BEEN IN TWO OTHER GARAGES FOR SECOND OPINIONS. <u>CONTACTED FORD MOTOR COMPANY AND THEY HAVE NO RECALLS OR ANY</u> <u>KNOWLEDGE OF THIS PROBLEM.</u> VEHICLE IS A DANGER TO THE HIGHWAY. *TR 1 Affected Product
8 9	June 27, 2017 NHTSA ID NUMBER: 11001691 Components: SUSPENSION, STEERING
10	NHTSA ID Number: 11001691 Incident Date June 15, 2013
11	Consumer Location VICTORIA, TX Vehicle Identification Number 1FT7W2BT4BE****
12	Summary of Complaint
13	CRASHNo FIRENo
14	INJURIES0
15	DEATHSO TI * THE CONTACT OWNS A 2011 FORD E 250, WHILE DRIVING 60 MRH. THE VEHICLE
	TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH, THE VEHICLE WOBBLED AND SHOOK VIOLENTLY. <b>THE VEHICLE WAS TAKEN TO THE DEALER</b>
16	(MAC HAIK FORD LINCOLN HYUNDAI 4506 N NAVARRO ST, VICTORIA, TX 77904), BUT
17	THE DEALER WAS UNABLE TO DUPLICATE THE FAILURE. THE DEALER REPLACED UNKNOWN PARTS ON THE FRONT END OF THE VEHICLE, BUT THE FAILURE
18	RECURRED SEVERAL MORE TIMES. THE MANUFACTURER STATED THAT THE
19	CONTACT SHOULD TAKE THE VEHICLE TO A DEALER AND HAVE IT DIAGNOSED. THE CONTACT WAS REFERRED TO NHTSA. THE APPROXIMATE FAILURE MILEAGE WAS
20	25,000.
21	1 Affected Product
22	
23	September 18, 2012 NHTSA ID NUMBER: 10475859 Components: STEERING, POWER TRAIN
	NHTSA ID Number: 10475859
24	Incident Date April 1, 2012
25	Consumer Location HYATTSVILLE, MD Vehicle Identification Number 1FT7W2BT9BE****
26	Summary of Complaint
27	CRASHNo FIRENo
28	INJURIES0
	DEATHS0
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	Class Action Complaint Case No.

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1 2 3 4 5 6 7 8	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE TRAVELING 66 MPH, THE VEHICLE SHOOK VIOLENTLY AND THERE WAS LOSS OF ACCELERATION POWER. <b>THE VEHICLE WAS ABLE TO BE DRIVEN TO THE</b> <b>CONTACT'S RESIDENCE AND WAS LATER TAKEN TO AN AUTHORIZED DEALER</b> <b>WHERE THE FAILURE COULD NOT BE DUPLICATED.</b> LATER WHILE TRAVELING 35 MPH, THE VEHICLE BEGAN TO WOBBLE UNCONTROLLABLY, CAUSING THE VEHICLE TO VEER TO THE LEFT ABNORMALLY. <b>THE VEHICLE WAS TAKEN TO THE DEALER</b> <b>WHERE THE FAILURE COULD NOT BE DUPLICATED. THE VEHICLE WAS NOT</b> <b>REPAIRED</b> HOWEVER, THE FAILURE RECURRED SEVERAL TIMES. THE MANUFACTURER WAS NOT CONTACTED. THE FAILURE MILEAGE WAS 4,000 AND THE CURRENT MILEAGE WAS 59,306. <b>1 Affected Product</b>
9	January 15, 2013 NHTSA ID NUMBER: 10493002
10	Components: STEERING NHTSA ID Number: 10493002
11	Incident Date January 12, 2013
12	Consumer Location BALTIMORE, MD Vehicle Identification Number N/A
13	Summary of Complaint
14	CRASHNo FIRENo
15	INJURIES0
16	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2011 FORD F250 SD. THE CONTACT STATED THAT WHILE
17	DRIVING 65 MPH, THE FRONT END STARTED TO SHAKE VIOLENTLY AND HE WAS
18	UNABLE TO CONTROL THE VEHICLE. THE VEHICLE WAS FORCED OFF THE ROAD TO
	THE SHOULDERS <u>. THE VEHICLE WAS TAKEN TO THE DEALER WHO ADVISED THAT</u> THERE WERE NO REPAIRS AND OFFERED NO ASSISTANCE. THE MANUFACTURER
19	WAS NOT NOTIFIED. THE VIN WAS UNKNOWN. THE FAILURE MILEAGE WAS 45,000.
20	1 Affected Product
21	
22	February 20, 2013 NHTSA ID NUMBER: 10499454 Components: STEERING
23	NHTSA ID Number: 10499454
24	Incident Date February 20, 2013
25	Consumer Location MCLOUD, OK Vehicle Identification Number 1FT7W2BT1BE****
	Summary of Complaint
26	CRASHNo FIRENo
27	INJURIES0
28	DEATHS0
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	Class Action Complaint
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.275 Page 275 of 353
1 2 3 4 5 6 7 8 9	WHILE TRAVELING AT HIGHWAY SPEED I HIT A BUMP AND THE VEHICLE BEGAN TO VIOLENTLY SHAKE. I HAD TO PULL THE VEHICLE OFF THE ROAD TO GAIN CONTROL. CONTINUED DOWN THE HIGHWAY AND VEHICLE STRUCK ANOTHER POT HOLE AND VEHICLE AGAIN WENT INTO A VIOLENT FRONT END SHAKE. I AGIAN HAD TO PULL TO THE SIDE OF THE HIGHWAY TO GAIN CONTROL OF THE VEHICLE. THE NHTSA NEED TO GO TO THE FORD FORUM AND READ THE STORIES ABOUT THE FRONT END WOBBLES, SHIMMY, AND SHAKING BY THE F250 AND F350S, THER ARE MANY NEAR MISS INCIDENTS THAT IF THEY OCCUR THESE VEHICLES ARE TO BIG FOR THE INDIVIDUALS IN THE OPPPSITE LANES TO SURVIVE. THE ISSUE STARTED AT ABOUT 6000 MILES ON THE TRUCK AND HAS GRADUALLY GOTTEN WORSE. <u>I HAVE TAKEN THE TRUCK TO</u> <b>THE DEALERSHIP FOR REPAIR AT 14,000 MILES AND AT 20,000 MILES WITH NO FIX</b> <b>PROVIDED.</b> *TR <b>1 Affected Product</b>
10	
10	April 7, 2014 NHTSA ID NUMBER: 10578052 Components: STEERING, SUSPENSION
	NHTSA ID Number: 10578052
12	Incident Date March 20, 2013 Consumer Location WASHINGTON, MI
13	Vehicle Identification Number 1FT8W3DT6EA****
14	Summary of Complaint
14	CRASHNo
15	FIRENo
16	INJURIES0
	<b>DEATHS0</b> 2011 F350 4X4 DUAL REAR WHEEL LARIAT. EVERYONE CALLS IT THE "SUPER DUTY
17	DEATH WOBBLE" FORD HAS NO PLANS TO FIX. STARTED AT 30K MILES, REPLACED
18	ALL KNOWN WORN PARTS AND SUGGESTED PARTS LIKE EVERYONE ELSE - STILL
19	DOING IT. YOUTUBE VIDEOS SHOW VIOLENT SHAKE TO THE POINT YOUR HEAD CAN
	SMACK THE SIDE WINDOWS. FRONT END ON HIGHWAY HITS SLIGHT BUMP LIKE ON
20	OVER PASS SHAKES SO VIOLENTLY IT CAN BREAK THE FRONT END WHEEL TIRES AND EVERYTHING ELSE CHANGED TIRES, STABILIZER SHOCK, ALIGNMENTS. RECENTLY
21	THIS PAST WEEK ON 175 IN OHIO IT HAPPENED 1/2 DOZEN TIMES @ 65 TO 70 MPH SHOOK
22	SO HARD YOU CANNOT CONTROL LOCK THE BRAKES DOWN HARD TO 30 MPH JUST
	LIKE EVERYONE ELSE ON THE NET SAYS. NEARLY CAUSING WRECKS ON THE
23	FREEWAY. HAPPENS WITHOUT WARNING. TOTALLY STOCK \$55K TRUCK. <u>DEALER SAYS</u> NO TSB OR RECALL. BUT FORD DOES KNOW ABOUT IT AND SAYS IT "MAY HELP"
24	TO CHECK STABILIZER SHOCK. EVERYONE HAS DONE THAT. GOOGLE SUPER DUTY
25	DEATH WOBBLE IT AND SEE VIDEOS. MY FIRST EVER ONLINE COMPLAINT. THIS
	FORD TRUCK IS INSANELY DANGEROUS. AT DEALER NOW WITH NO SOLUTION. I
26	DISCOVERED BY SWITCHING INTO 4WHD IT WILL STOP WHICH TELLS ME IT IS
27	INTERNAL CONTROL ARM BUSHINGS BECAUSE 4WD WILL BIND THE FRONT END UP ENOUGH TO PRELOAD SUSPENSION. IT GOT ME HOME BUT THE WIFE WILL NEVER RIDE
28	IN IT AGAIN! *TR
20	1 Affected Product
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1	
2	November 18, 2015 NHTSA ID NUMBER: 10794621
3	Components: SUSPENSION, STEERING
1	NHTSA ID Number: 10794621
4	Incident Date October 25, 2015
5	Consumer Location MERIDIAN, ID Vehicle Identification Number 1FT7W2BT1CE****
6	Summary of Complaint
-	CRASHNo
7	FIRENo
8	INJURIES0 DEATHS0
9	DRIVING AT HIGHWAY SPEEDS OF 55 - 65MPH AND HIT A SLIGHT BUMP IN THE ROAD
10	THE ENTIRE FRONT END OF THE VEHICLE SHAKES UNCONTROLLABLY. IN ORDER TO GET THIS TO STOP YOU MUST SLAM ON THE BRAKES TO BRING THE SPEED DOWN TO 15
11	- 20 MPH. <u>FORD DEALERSHIP SERVICE ADVISER AND MECHANIC ACKNOWLEDGE</u> THIS ISSUE EXISTS AND HAS SINCE 2005 BUT THERE ISN'T ANY RESOLUTION FOR
12	THE ISSUE EXISTS AND HAS SINCE 2005 BUT THERE ISN'T ANT RESOLUTION FOR THE ISSUE. MY VEHICLE HAS BEEN IN THE SHOP 3 DIFFERENT TIMES FOR OVER A
	MONTH IN TOTAL TIME. FORD REGION CUSTOMER SERVICE MANAGER STATES THE
13	ISSUE IS THE ROAD. I FIND IT ODD THERE ARE MAY OTHER FORD TRUCK OWNERS WITH
14	THE SAME ISSUE.
15	1 Affected Product
16	February 18, 2018 NHTSA ID NUMBER: 11073450
17	Components: SUSPENSION
18	<b>NHTSA ID Number:</b> 11073450
	Incident Date January 17, 2018 Consumer Location CORPUS CHRISTI, TX
19	Vehicle Identification Number 1FT7W2BTXCE****
20	Summary of Complaint
21	CRASHNo
21	FIRENo
22	INJURIES0 DEATHS0
23	FRONT SUSPENSION SHAKES VIOLENTLY AT HIGHWAY SPEEDS. THE PROBLEM IS
24	<b>REFERRED TO AS THE "DEATH WOBBLE" BY THE FORD DEALERSHIP SERVICE</b>
	MANAGER. THE FORD DEALERSHIP HAS MADE NUMEROUS ATTEMPTS TO RESOLVE THE PROBLEM BUT ALL HAVE FAILED. THERE ARE WEBSITES, FACEBOOK
25	PAGES,AND FORUMS DEVOTED TO THIS PROBLEM. DOES SOMEONE HAVE TO DIE
26	BEFORE FORD WILL ISSUE A RECALL????
27	1 Affected Product
28	July 9, 2018 NHTSA ID NUMBER: 11110173
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1 2	Components: SUSPENSION NHTSA ID Number: 11110173 Incident Date July 4, 2018
3	Consumer Location COLUMBUS GROVE, OH Vehicle Identification Number 1FT7W2BTXCE****
4	Summary of Complaint
5	CRASHNo FIRENo
6	INJURIES0
Ŭ	DEATHS0
7	THE TRUCK SHAKES VIOLENTLY AT TIMES AFTER A BUMP IN THE ROAD. <u>OUR TRUCK</u> WENT BACK TO THE DEALER SEVERAL TIMES WHILE UNDER WARRANTY FOR THIS
8	HOWEVER THEY SAID SINCE IT COULD NOT BE REPRODUCED CONSISTENTLY NOTHING COULD BE DONE. IT HAS GRADUALLY GOTTEN WORSE - MUCH WORSE.
10	LAST SUMMER IT GOT SO BAD IT WAS SCARY TO DRIVE SO WE TOOK IT TO ANOTHER MECHANIC WHO PUT NEW SUSPENSION PARTS IN THE FRONT END. AFTER A COUPLE
10	THOUSAND IN REPAIRS AND MANY NEW PARTS, IT STILL SHAKES SO VIOLENTLY WE
12	CANNOT DRIVE IT SAFELY. FORD KNOWS ABOUT THESE COMPLAINTS - THEY ARE ALL OVER THE INTERNET AND ON THIS SITE SO WHY CAN THIS NOT BE FIXED? I DROVE MY
13	GRAND-DAUGHTERS IN IT ONE DAY TWO WEEKS AGO AND AFTER NOT HAPPENING FOR DAYS IT HAPPENED AND IT'S A WONDER WE DID NOT HIT THE ONCOMING CAR
	HEAD ON. SOMEONE IS GOING TO DIE IN ONE OF THESE TRUCKS AND THEN MAYBE
14	FORD WILL STEP UP AND AT LEAST TELL THOSE OF US THAT OWN THEM HOW TO FIX
15	THIS PROBLEM! IT SEEMS LIKE IT RARELY HAPPENS AT 40 MPH OR BELOW BUT HAPPENS QUICKLY AT 55 MPH OR MORE. IF SOMEONE DIES FROM THIS "DEATH
16	WOBBLE" IT SHOULD BE FORD'S RESPONSIBILITY.
17	1 Affected Product
18	July 11, 2018 NHTSA ID NUMBER: 11110864
19	Components: SUSPENSION
20	NHTSA ID Number: 11110864
21	Incident Date July 9, 2018
	Consumer Location COLUMBIA CITY, IN Vehicle Identification Number 1FT7W2BT3CE****
22	Summary of Complaint
23	CRASHNo FIRENo
24	INJURIES0
25	<b>DEATHS0</b> THE VEHICLE WILL RANDOMLY SHAKE VIOLENTLY CAUSING LOSS OF CONTROL OF
26	THE TRUCK WHILE DRIVING. AFTER DOING RESEARCH I FOUND PEOPLE WHO HAVE
	REFERRED TO THIS AS THE "DEATH WOBBLE." <u>I HAVE HAD REPAIRS TO MY TRUCK 3</u>
27	TIMES IN THE LAST 2 YEARS TO FIX THIS CAUSING ME APPROXIMATELY \$1000 FACH TIME MOST DECENTLY MONDAY, HU V 9, 2018, THE "DEPAID" SEEMS TO BE
28	EACH TIME. MOST RECENTLY MONDAY JULY 9, 2018. THE "REPAIR" SEEMS TO BE ONLY TEMPORARY AND EACH TIME I HAVE IT FIXED IT LASTS 6-9 MONTHS. THE
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1 2 3	DEALERSHIP IS UNWILLING TO HELP NOR IS FORD CUSTOMER COMPLAINT DEPARTMENT. THIS HAPPENS WHILE DRIVING 55-65 MPH AND AFTER HITTING A BUMP. 1 Affected Product
4	August 17, 2018 NHTSA ID NUMBER: 11120681
5	Components: STEERING
6	NHTSA ID Number: 11120681 Incident Date August 19, 2017
-	Consumer Location SKOKIE, IL
7	Vehicle Identification Number 1FT7W2BT4CE****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0 DEATHS0
11	AS REPORTED FROM PREVIOUS OWNERS, DEATH WOBBLE HAS HAPPENED A NUMBER
	OF TIMES. I GET WOBBLE AT DIFFERENT TIMES IN DRIVING. I HAD DRIVEN 240 MILES
12	ON THE HIGHWAY WITH NO PROBLEMS. AS I APPROACHED A TRAFFIC LIGHT TO MAKE A LEFT TURN, THE STEERING WHEEL STARTED TO WOBBLE AND FELT LIKE IT WANTED
13	TO LOCK UP. I PULLED OVER TO CHECK FRONT WHEELS WITH NOT NOTICING
14	ANYTHING WRONG STARTED DRIVING AND WOBBLE WAS GONE. THE STEERING
15	WHEEL HAS STARTED DOING MORE OF THE "DEATH WOBBLE" AT ANY SPEED. <u>I SPOKE</u> WITH THE FORD DEALER AND THEY DIDN'T HAVE AN ANSWER. WHEN YOU SPEND
16	\$65,000.00 AND THIS HAPPENS THE MANUFACTURER SHOULD BE SENDING OUT RECALL
17	NOTICES. THE MANUFACTURE KNOWS ABOUT THIS AND CHANGED IT ON NEWER VEHICLES SO THEY MUST KNOW WHAT THE PROBLEM IS. LET'S HOPE NO ONE GETS
	KILLED OR SERIOUS INJURED FROM THE DEATH WOBBLE. IS FORD READY TO FIGHT
18	THIS IN COURT ON A CLASS ACTION LAWSUIT? MY VEHICLE HAS 149,000 MILES ON IT AND STARTED AROUND 130,000 MILES.
19	1 Affected Product
20	
21	April 11, 2016 NHTSA ID NUMBER: 10854813
22	Components: STEERING, SUSPENSION, UNKNOWN OR OTHER
23	NHTSA ID Number: 10854813
	Incident Date November 12, 2013 Consumer Location GOSHEN, OH
24	Vehicle Identification Number 1FT7W2BT5CE****
25	Summary of Complaint CRASHNo
26	FIRENo
27	INJURIES0
28	DEATHSO SEVERAL TIMES, AFTER HITTING A SMALL BUMP IN THE ROAD, GENERALLY AT SPEEDS
20	OVER 50 MPH, I HAVE EXPERIENCED AN EXTREME "SHIMMY" IN THE FRONT END OF
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.279 Page 279 of 353
1 2 3 4 5 6	THE VEHICLE CAUSING LIMITED CONTROL. <u>I TOOK THE VEHICLE TO THE DEALER</u> <u>FOR REPAIRS, HOWEVER, THEY COULD NOT DETERMINE THE CAUSE AND AFTER</u> <u>REPLACING SEVERAL PARTS THEY WERE STILL NOT ABLE TO RESOLVE THE</u> <u>PROBLEM.</u> I TOOK THE VEHICLE TO A PRIVATE REPAIR SHOP AND HAD SEVERAL OTHER PARTS REPLACED AND STILL NO RESOLUTION TO THE PROBLEM. BALANCING AND TIRE PRESSURE HAVE BEEN MAINTAINED BY THE DEALER AS WELL AS OTHER CERTIFIED MECHANICS. DUE TO THE LOSS OF CONTROL WHEN THIS WOBBLE OCCURS, I AM AFRAID TO DRIVE THE VEHICLE <b>1 Affected Product</b>
7 8 9 10 11	July 29, 2016 NHTSA ID NUMBER: 10891584 Components: ELECTRONIC STABILITY CONTROL, STEERING NHTSA ID Number: 10891584 Incident Date September 1, 2014 Consumer Location Unknown Vehicle Identification Number 1FT8W3BT4CE**** Summary of Complaint
<ol> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2012 FORD F-350. WHILE DRIVING APPROXIMATELY 75 MPH, THE FRONT END OF THE VEHICLE AND STEERING WHEEL BEGAN TO VIOLENTLY VIBRATE. THE CONTACT HAD TO APPLY THE BRAKES TO FORCE THE VEHICLE TO DECREASE IN SPEED. THE VEHICLE WAS EVENTUALLY TURNED OFF TO STOP THE VIBRATION. <u>THE CONTACT TOOK THE VEHICLE TO THE DEALER WHO INFORMED</u> THE CONTACT THAT THIS WAS COMMON AMONG FORD VEHICLES AND WAS KNOWN AS THE "DEATH WOBBLE." THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE RECURRED. THE APPROXIMATE FAILURE MILEAGE WAS 141,000. 1 Affected Product
<ol> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	August 6, 2016 NHTSA ID NUMBER: 10893771 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 10893771 Incident Date July 4, 2015 Consumer Location ROSLYN HARBOR, NY Vehicle Identification Number 1FT8W3BT7EE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0
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	Case No.

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1 2 3 4 5 6 7 8 9 10 11	THE PICKUP TRUCK WAS PURCHASED BRAND NEW FROM THE DEALERSHIP, AND IT IS INHERENT TO WHAT IS KNOWN AS THE "DEATH WOBBLE." THIS MAINLY HAPPENS WHEN THE VEHICLE IS ON THE HIGHWAY GENERALLY WHILE IN THE SPEED BETWEEN 55 AND 60 MPH, DURING A COURSE OF SLIGHT TURN EITHER TO THE RIGHT OR TO THE LEFT WHEN IMPACTED BY A SLIGHT BUMP, THE TRUCK GOES INTO A VIOLENT SHAKING. THE ATTEMPT OF APPLYING THE BRAKES WOULD MAKE THE SYMPTOMS WORSE. THE ATTEMPT OF INCREASING SPEED WOULD AGAIN MAKE THE SYMPTOMS WORSE. STEERING IS ALMOST NONE EXISTENT AS THE STEERING WHEEL IS SHAKING PROFUSELY. FORD MANUFACTURER IS AWARE OF THIS ISSUE, YET NO RESOLUTION BY THEM. THE DEALERSHIP HAS BEEN GIVEN AMPLE OPPORTUNITY TO FIX THE TRUCK, BUT THEY HAVE NOT BEEN ABLE TO. THE PROBLEM CONTINUES AND IS ALSO PLAGUING OTHER SIMILAR VEHICLES. THE LINK ATTACHED HERE WILL SHOW YOU TWO SEPARATE EPISODES OF WHAT HAPPENS AND HOW DANGEROUS THIS VEHICLE IS TO THE PUBLIC. I ENCOURAGE YOU TO VIEW THEM, AS IT IS JAW DROPPING. HTTP://VID1108.PHOTOBUCKET.COM/ALBUMS/H403/DNMELAMED/FORD%20F350/FHSN88 581_ZPSWZN4GWYE.MP4 AND HTTP://VID1108.PHOTOBUCKET.COM/ALBUMS/H403/DNMELAMED/FORD%20F350/IMG_92 (71 d780 DD DEDT). WHAT
12 13	601_ZPSBCRDEDTL.MP4 1 Affected Product
14	
15	February 3, 2016 NHTSA ID NUMBER: 10823993 Components: ENGINE, STEERING
	NHTSA ID Number: 10823993
16	Incident Date July 1, 2015 Consumer Location FARMINGTON, NM
17	Vehicle Identification Number N/A
18	Summary of Complaint
19	CRASHNo FIRENo
20	INJURIES0
21	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2015 FORD F-250. WHILE DRIVING AT VARIOUS SPEEDS, THE
22	VEHICLE SUDDENLY BECAME TURBULENT, SHOOK, AND A KNOCKING NOISE WAS HEARD FROM THE ENGINE. THE CONTACT WOULD HAVE TO PARK AND TURN OFF THE
23	VEHICLE IN ORDER TO STOP THE FAILURE FROM OCCURRING. THE CONTACT TOOK
24	THE VEHICLE TO THE DEALER FIVE TIMES. THE DEALER STATED THAT THIS WAS
25	A COMMON FAILURE WITH THE VEHICLE AND THERE WAS NO REMEDY. THE VEHICLE WAS NOT REPAIRED. THE FAILURE RECURRED. THE MANUFACTURER STATED THAT THE FAILURE DID NOT ON ALLEY UNDER THE LEMON LAW. THE VIN WAS
26	STATED THAT THE FAILURE DID NOT QUALIFY UNDER THE LEMON LAW. THE VIN WAS UNKNOWN. THE APPROXIMATE FAILURE MILEAGE WAS 19,000.
27	1 Affected Product
28	
	June 5, 2018 NHTSA ID NUMBER: 11099958
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1 2 3 4 5 6 7 8 9	Components: STEERING, WHEELS NHTSA ID Number: 11099958 Incident Date May 31, 2018 Consumer Location SUGAR HILL, NH Vehicle Identification Number 1FT8X3BT7FE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 DEATHS0 DEATH WOBBLE MANY TIMES. VEHICLE IS COMPLETELY OUT OF CONTROL. NOT COOL IN HEAVY TRAFFIC ON WAY TO BOSTON (65 MPH). TIRES ARE PROPERLY INFLATED. VEHICLE HAS BEEN HAVING PROBLEM SINCE 45,000 MILES AND NOW HAS 55,000 MILES ON IT. DEALER HAS ONLY MADE "SUGGESTIONS" ON WHAT TO DO TO CORRECT PROBLEM. WORRIED I WILL BE KILLED OR KILL SOMEONE WHEN DRIVING THIS VEHICLE.
10	VEHICLE. 1 Affected Product
12	
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> </ol>	Components: STEERING NHTSA ID Number: 11141552 Incident Date October 14, 2018 Consumer Location GROTON, CT Vehicle Identification Number 1FT7X2B69GE**** Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO MY TRUCK, WITH 41,000 MILES , IS SUFFERING WHATS BEING REFERRED TO ONLINE AS
<ul> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ul>	THE "DEATH WOBBLE ". THE SYMPTOMS BEGAN AT AROUND 21,000 MILES AND IT HAS GROWN STEADILY WORSE. IT HAPPENS WHEN HITTING BUMPS OR BRIDGE EXPANSION JOINTS AT HIGHWAY SPEED, FORCING ME TO SLOW TO APPROX 20 MPH TO REGAIN CONTROL, WHICH IS VERY UNSAFE ON A CROWDED HIGHWAY. <u>THE DEALER I</u> <u>PURCHASED THE TRUCK FROM NEW SAID IT IS NOT A WARRANTY ITEM AND MAY</u> <u>NOT EVEN BE COVERED UNDER MY ADDITIONALLY PURCHASED 10 YEAR 100,000</u> <u>MILE EXTENDED WARRANTY.</u> THE TRUCK IS ESSENTIALLY UNSAFE AT HIGHWAY
24 25 26	SPEEDS AND MY WIFE WONT EVEN RIDE IN IT. FORD IS IGNORING A HUGE PROBLEM WITH THEIR PRODUCT, PEOPLE HAVE ALREADY BEEN HURT, SOMEONE IS GOING TO BE KILLED! PLEASE HELP!! I HAVE AN APPOINTMENT AT THE DEALERS SERVICE DEPARTMENT FOR TUEDAY, 10-23-18. THEY HAVE INFORMED ME THAT ANY WORK
27 28	THEY DO MAY BE ON MY DIME, WHICH JUST BLOWS MY MIND. AGAIN, PLEASE INTERJECT INTO THIS ISSUE BEFORE SOMEONE IS KILLED AND TO SAVE THE BUYERS FROM HAVING TO PAY FORD TO ADDRESS THIS OBVIOUS ENGINEERING MISTAKE. 1 Affected Product
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	Class Action Complaint Case No.

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1	
2	
	December 12, 2017 NHTSA ID NUMBER: 11054256
3	Components: STEERING NHTSA ID Number: 11054256
4	Incident Date October 12, 2017
5	Consumer Location MASON, TX
5	Vehicle Identification Number 1FDRF3FT1GE****
6	Summary of Complaint
7	CRASHNo
-	FIRENo INJURIESO
8	DEATHS0
9	TL* THE CONTACT OWNS A 2016 FORD F-350. WHILE DRIVING VARIOUS SPEEDS, THE
10	VEHICLE BEGAN TO SHAKE VIOLENTLY WITHOUT WARNING. THE FAILURE RECURRED RANDOMLY. THE VEHICLE WAS TAKEN TO THE LOCAL DEALER (MCLEAN FORD OF
11	FREDERICKSBURG, 1279 US-87, FREDRICKBURG, TX 78624), BUT THE CAUSE OF THE
	FAILURE COULD NOT BE DETERMINED. THE VEHICLE WAS ALSO TAKEN TO AN
12	INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE STEERING DAMPER
13	FAILED AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND DID NOT ASSIST. THE FAILURE
14	MILEAGE WAS APPROXIMATELY 14,000.
14	1 Affected Product
15	
16	April 12, 2018 NHTSA ID NUMBER: 11084855
17	Components: SUSPENSION
10	NHTSA ID Number: 11084855
18	Incident Date April 6, 2018
19	Consumer Location FREDERICKSBURG, VA Vehicle Identification Number 1FT7W2BT4HE****
20	Summary of Complaint
	CRASHNo
21	FIRENo
22	INJURIES0
22	DEATHSO
23	DEATH WOBBLE OCCURRED AT AROUND13K MILES. IT IS TRIGGERED BY HITTING A BUMP AT 45MPH OR FASTER. WHOLE FRONT END SHAKES SO BADLY YOUR ONLY
24	OPTION IS TO SLAM ON THE BRAKES AND SWERVE ONTO THE SHOULDER. SHAKING
25	GOES AWAY AT 25MPH. DEALERSHIP COULD NOT FIND A VISIBLE PROBLEM, BUT
	DID EXPERIENCE THE WOBBLE. MECHANIC WAS TERRIFIED. FORD HQ TOLD THEM
26	TO RANDOMLY CHANGE COMPONENTS UNTIL THE PROBLEM WAS FIXED. IT DID
27	GO AWAY UNTIL NOW. TRUCK HAS 22K MILES ON IT AND THE DEATH WOBBLE IS
28	BACK. <u>DEALERSHIPS CANT SEE ANYTHING WRONG BUT WONT DRIVE TRUCK LONG</u> ENOUGH TO HIT THE 'RIGHT' BUMP TO TRIGGER THE WOBBLE, SO WONT RE-FIX
20	IT. THIS IS A CATASTROPHIC FAILURE OF THE FRONT END, AND FORD CLAIM NOT TO
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.283 Page 283 of 353
1 2 3 4 5 6	KNOW ANYTHING ABOUT IT. <u>PA DEALERSHIP TOLD ME THEY HAD HEARD ABOUT IT</u> <u>BEING AN ISSUE, AND OTHER PEOPLE ON LINE ARE EXPERIENCING THE SAME</u> <u>THING</u> . I AM TERRIFIED TO DRIVE OVER 35MPH IN CASE I HIT THE BUMP THAT TRIGGERS IT. I HAVE ALREADY HAD A TRUCK AND SEVERAL CARS SWERVE TO AVOID HITTING ME. THIS PROBLEM MUST BE RECTIFIED, OR SOMEONE WILL BE INJURED. THE VEHICLE HAS BEEN WELL MAINTAINED AND HAS NO MODIFICATIONS. WOBBLE DOES NOT OCCUR EVERY TIME I HIT A BUMP. IT SEEMS TO BE CERTAIN BUMPS THAT TRIGGER IT. <b>1 Affected Product</b>
7 8 9 10	May 14, 2018 NHTSA ID NUMBER: 11093735 Components: STEERING, SUSPENSION NHTSA ID Number: 11093735 Incident Date May 1, 2018 Consumer Location MARIETTA, GA
11 12 13	Vehicle Identification Number 1FT7W2BT4HE**** Summary of Complaint CRASHNo FIRENo INJURIES0
<ol> <li>14</li> <li>15</li> <li>16</li> <li>17</li> </ol>	<b>DEATHS0</b> VIOLENT DEATH WOBBLE WHEN HITTING A BUMP AT SPEEDS OVER 50 MPH. VEHICLE BECOMES VERY UNSTABLE AND SHAKES VIOLENTLY. MUST REDUCE SPEED IMMEDIATELY TO UNDER 20 MPH TO REGAIN CONTROL. <u>HAVE TAKEN TO DEALER</u> <u>AND THEY CANNOT FIX THE PROBLEM. INVESTIGATING LEMON LAW</u> . INCREDIBLEY UNSAFE PROBLEM. HAVE SEEN NUMEROUS REPORTS OF THIS CONDITION AND STILL
18 19	NO FIX/RECALL. 1 Affected Product
20	October 23, 2018 NHTSA ID NUMBER: 11141982 Components: STEERING, SUSPENSION
21 22	NHTSA ID Number: 11141982 Incident Date October 19, 2018 Consumer Location VACAVILLE, CA
23 24	Vehicle Identification Number 1FT7W2B60HE**** Summary of Complaint
25	CRASHNo FIRENo INJURIES0
26 27	<b>DEATHS0</b> 10/19/2018, AT 54 MPH, ON A SMOOTH, 4 LANE FREEWAY AT 4:30 AM, MY TRUCK BEGAN SHAKING AND VIBRATING VIOLENTLY AS THOUGH I WAS DRIVING ON A ROLLING
28	FLAT TIRE. I IMMEDIATELY LET OFF THE GAS TO SLOW DOWN AS QUICKLY AS I COULD WITHOUT BRAKING; ALTHOUGH DIFFICULT TO STEER, I WAS ABLE TO GET THE TRUCK
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1 2 3 4 5 6 7 8 9 10 11	OVER TO THE SHOULDER OF THE ROAD TO INSPECT IT. I COULD NOT DETERMINE THERE WAS ANYTHING WRONG WITH THE TRUCK OR ANY EVIDENCE I UNKNOWINGLY RAN OVER SOMETHING. LATER THAT MORNING, CALLED 3 FORD DEALERSHIPS TO SEE IF I COULD GET MY TRUCK IN FOR INSPECTION, WHICH ALL 3 TOLD ME THIS ISSUE IS KNOW AS THE FORD DEATH WOBBLE. I WAS TOLD THAT MY TRUCK COULDN'T BE SEEN UNTIL THE FOLLOWING FRIDAY. I CONTACTED MY LOCAL TIRE SHOP WHOM I HAVE DONE BUSINESS WITH ALL MY FLEET TRUCKS AND TRUST THEIR EXPERIENCE IN SUSPENSION, TIRE, BRAKE AND SHOCK SERVICES. THE MANAGER TOLD ME THE SAME THING ABOUT THE FORD DEATH WOBBLE. HE SAID HE WOULD BE HAPPY TO LOOK AT THE TRUCK AND MAKE SURE NOTHING WAS LOOSE, BROKEN AND THAT THE ALIGNMENT WAS CORRECT. THAT ALL CHECKED OUT FINE. AFTER RESEARCHING THIS, I LEARNED THAT THIS IS COMMON FOR THE SUPER DUTY TRUCKS AND APPARENTLY FORD IS NOT DOING ANYTHING TO CORRECT IT. THIS IS AN EXTREMELY DANGEROUS SITUATION AND I HOPE THAT THE NHTSA TAKES THIS ISSUE SERIOUSLY AND BECOMES INVOLVED IN THE REMEDY OF THIS PROBLEM. 1 Affected Product
12	October 26, 2018 NHTSA ID NUMBED, 11142055
13	October 26, 2018 NHTSA ID NUMBER: 11142955 Components: STEERING, SUSPENSION
14	NHTSA ID Number: 11142955 Incident Date August 31, 2018
15	Consumer Location LOS GATOS, CA
16	Vehicle Identification Number N/A Summary of Complaint
17	CRASHNo
18	FIRENo INJURIES0
19	DEATHSO
	TL* THE CONTACT OWNS A 2017 FORD F-250 SD. THE CONTACT STATED THAT THE VEHICLE EXPERIENCED A "DEATH WOBBLE" WHILE DRIVING HIGHWAY SPEEDS. WHEN
20	THE VEHICLE WAS DRIVEN OVER 70 MPH, IT WAS EXTREMELY DIFFICULT FOR THE
21	CONTACT TO OPERATE THE VEHICLE. THE DEALER (GALPIN FORD, 15505 ROSCOE
22	BLVD, NORTH HILLS, CA 91343, 1-(818) 787-3800) KEPT THE VEHICLE FOR MONTHS, BUT COULD NOT DIAGNOSE OR REPAIR THE VEHICLE. THE DEALER DID NOT
23	PROVIDE A LOANER VEHICLE OPTION DURING THAT TIME. THE MANUFACTURER WAS
24	NOTIFIED OF THE FAILURE AND THE CONTACT WAS WAITING ON THEIR RESPONSE. THE VIN AND FAILURE MILEAGE WERE NOT AVAILABLE.
25	1 Affected Product
26	November 13, 2018 NHTSA ID NUMBER: 11151224
27	Components: STEERING
28	NHTSA ID Number: 11151224
	Incident Date October 27, 2018 -284-
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1	Consumer Location GRIMESLAND, NC
2	Vehicle Identification Number 1FT7W2B65HE****
	Summary of Complaint CRASHNo
3	FIRENo
4	INJURIES0
5	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2017 FORD F-250. WHILE DRIVING APPROXIMATELY 70 MPH,
6	THE VEHICLE SHOOK VIOLENTLY AND THE STEERING WHEEL TURNED RIGHT AND
	LEFT. THE CONTACT ALMOST LOST CONTROL OF THE VEHICLE. THERE WAS NO
7	WARNING INDICATOR ILLUMINATED. THE FAILURE RECURRED. <u>THE VEHICLE WAS</u> TAKEN TO DEACON JONES FORD-LINCOLN, INC. (919-736-3387, LOCATED AT 3301
8	MCLAIN ST, GOLDSBORO, NC 27534) WHERE IT WAS STATED THAT THE FAILURE
9	WAS A KNOWN OCCURRENCE, BUT THERE WAS NEITHER A RECALL NOR A
10	QUALIFIED TECHNICIAN TO REMEDY THE FAILURE. THE TECHNICIAN STATED THAT THE VEHICLE WAS NOT MANUFACTURED BY THE DEALER. THE
	MANUFACTURER WAS MADE AWARE OF THE FAILURE AND PROVIDED A CASE
11	NUMBER. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS
12	APPROXIMATELY 24,000. <b>1 Affected Product</b>
13	1 Affecteu Froduct
14	
15	51. On June 17, 2011, Ford issued a Technical Service Bulletin ("TSB"), stating that "some
	2011 F-250, F-350, and F-450 vehicles equipped with 4x4 and built 2/5/2010 through 8/1/2010 may
16	exhibit a steering wheel oscillation after hitting rough pavement or an expansion joint during a slight left
17	
18	turn 50-55 mph." That TSB recommended that service technicians test the tire pressure of affected
10	vehicles. And if that remedy was unsuccessful, Ford instructed its technicians to test the steering

dampers and replace those that were faulty.

52. Based on information and belief, in January 2018, Ford's Customer Service Division issued a letter to owners of 2008 F-250 and 350 4X4 trucks. In that letter, Ford acknowledged the Defect, but failed to alert Class Members to the possibility of a defective steering damper and direct them to obtain an inspection. Instead, Ford concealed its knowledge regarding the true nature of the Defect and failed to warn Class Members about the potential life-threatening results that might occur from continued use of the Class Vehicles.

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23

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1	3. Examples of NHTSA Consumer Complainants Who Were Told by Defendant Ford
2	and/or its Authorized Dealers that the Death Wobble Was Caused by Tires,
3	Improper Tire Pressure, Tire Balancing and Rotation, Wheel Alignment, Steering
4	Stabilizer, Ball Joints, Tie Rods, Universal Joint, Steering Dampener, Track Link,
5	Stearing Gear Box, Track Bar Bushings, Shocks, and/or Front Drive Link
6	53. The following are just a few examples of the consumer complaints submitted to NHTSA
7	where the Complainant States that Defendant Ford's authorized dealers stated that the Death Wobble
8	was caused by tires, improper tire pressure, tire balancing and rotation, wheel alignment, steering
9	stabilizer, ball joints, tie rods, universal joint, steering dampener, track link, stearing gear box, track bar
10	bushings, shocks, and/or front drive link.
11	
12	December 17, 2018 NHTSA ID NUMBER: 11161969
12	Components: STEERING, SUSPENSION NHTSA ID Number: 11161969
	Incident Date December 4, 2018
14	Consumer Location EUSTIS, FL Vehicle Identification Number 1FT7W2BT0JE****
15	Summary of Complaint
16	CRASHNo FIRENo
17	INJURIES0
18	DEATHS0
	THE "DEATH WOBBLE" UNCONTROLLABLE SHIMMYING OF THE STEERING WHEEL AFTER HITTING A BUMP IN THE ROAD ON MOSTLY HIGHWAYS AT HIGHWAY SPEEDS! I
19	HAVE TAKEN IT TO MULTIPLE DEALERSHIPS AND THEY JUST KEEP TRYING TO
20	BLAME MY TIRES. THEY TRIED ROTATING MY TIRES AND TELLING ME ITS GONNA
21	FIX THE ISSUE BUT DOESN'T. THE TIRES ON THE TRUCK ARE GOODYEAR WRANGLER KEVLAR TIRES THAT CAME ON THE TRUCK FROM THE DEALERSHIP AND NOW HAVE
22	ONLY 20,000 MILES AND ARE NOWHERE NEAR WORN OUT! IT HAS HAPPENED TO ME AT
	SLOWER SPEEDS (AROUND 45 MPH) IN THE CITY, BUT MOSTLY OCCURS AROUND 60-
23	70MPH ON THE HIGHWAY.
24	1 Affected Product
25	
26	February 2, 2019 NHTSA ID NUMBER: 11173650
	Components: STEERING, SUSPENSION NHTSA ID Number: 11173650
27	Incident Date January 14, 2019
28	Consumer Location FAIRPORT, NY
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	Class Action Complaint
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1 2 3 4 5 6 7 8 9 10 11	Vehicle Identification Number 1FT7W2BT7HE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 WHEN TRAVELING AT HIGHWAY SPEEDS (60+ MPH) AND YOU HIT CERTAIN TYPES OF BUMPS THE THE ROAD THE STEERING WHEEL SHAKES VIOLENTLY AFTER THE BUMP. THIS HAS HAPPENED FOUR TIMES IN THE LAST MONTH. IT APPEARS TO ONLY HAPPEN OVER A ROAD IMPERFECTION WHERE THE TWO FRONT WHEELS HIT IT INDEPENDENTLY IE A SKEWED ANGLE BRIDGE JOINT OR A SINGLE POT HOLE. <u>AT THE</u> DEALERS INSTRUCTION I HAVE ROTATED AND BALANCED TIRES, CHECKED TIRE INFLATION. THE TRUCK HAS 20,000 MILES ON IT NOW AND THIS FIRST HAPPENED AT 17,000 MILES. MY RESEARCH TELLS ME THAT THIS PROBLEM IS COMMONLY CALLED "DEATH WOBBLE" WHICH IT APPEARS FORD HAS ISSUED A TECHNICAL SERVICE BULLETIN FOR. I AM GOING TO TRY ANOTHER DEALER AND GIVE THEM THE INFO I HAVE. 1 Affected Product
12	
13	Luly 24, 2017 NILITS & ID NILIMDED, 11010209
14	July 24, 2017 NHTSA ID NUMBER: 11010308 Components: SUSPENSION
15	NHTSA ID Number: 11010308
16	Incident Date February 15, 2015 Consumer Location COLORADO SPRINGS, CO
17	Vehicle Identification Number 1FT8W3BT0DE****
18	Summary of Complaint
10	CRASHNo FIRENo
19	INJURIES0
20	DEATHS0
21	TL* THE CONTACT OWNS A 2013 FORD F-350. ON SEVERAL OCCASIONS, WHILE DRIVING
21	55 MPH, THE VEHICLE VIOLENTLY SHOOK WHEN MAKING CONTACT WITH A BUMP. THE CONTACT STATED THAT THE STEERING WHEEL BECAME DIFFICULT TO MANEUVER
	WHEN THE SHAKING OCCURRED AND THE CHECK ENGINE WARNING INDICATOR ILLUMINATED. <b>THE VEHICLE WAS TAKEN TO PHIL LONG FORD OF MOTOR CITY</b>
23	(1212 MOTOR CITY DR, COLORADO SPRINGS, CO 80905 (719) 694-3487) WHERE THE
24	FAILURE WAS DIAGNOSED AS THE (DEATH WOBBLE). THE BALL JOINTS, TRACKING
25	BAR BUSHINGS, SPRING MOUTH, STEERING STABILIZER SHOCK, AND ALL FOUR TIRES NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE
26	<b>RECURRED.</b> THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO
	TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS OFFERED.
27	THE FAILURE MILEAGE WAS 53,000.
28	1 Affected Product
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1 2 3 4 5 6	December 5, 2016 NHTSA ID NUMBER: 10930091 Components: STEERING, SUSPENSION NHTSA ID Number: 10930091 Incident Date March 1, 2016 Consumer Location LIVINGSTON, TX Vehicle Identification Number 1FT7W2BT1CE**** Summary of Complaint CRASHNo FIRENo
7	INJURIES0
8	<b>DEATHS0</b> FORD F250 TRUCK - FRONT END SUSPENSION AND 4 WHEEL DRIVE PROBLEMS. SINCE
9	MARCH OF THIS YEAR 2016, @ 90K MILES, WHILE DRIVING DOWN THE ROAD, TRAVELING AROUND 50 MPH, THE FRONT SUSPENSION ON MY FORD F250 STARTED
10	SHAKING AND WOBBLE UNCONTROLLABLE. THIS HAS HAPPENED PROBABLY 20 TIMES OR SO. THE WOBBLE WAS SO SERIOUS AND SCARY. I WOULD HAVE TO APPLY MY
11	BRAKES AND HOLD ONTO THE STEERING WHEEL WITH A STRONG GRAB, TO KEEP MY TRUCK ON THE ROAD. OTHER VEHICLES AROUND MINE, WOULD SCATTER OUT OF MY
12 13	WAY. ON OCTOBER 17, 2016, I HAD THE STEERING DAMPER REPLACED AND THE
13	TRACK BAR BALL REPLACED, COSTING \$361.71. "DEATH WOBBLE", WAS STILL HAPPENING. LAST MONTH ON NOVEMBER 14, 2016, I TOOK MY TRUCK INTO OUR
15	LOCAL FORD DEALERSHIP FOR REPAIRS ON THE SUSPENSION PROBLEM - "DEATH WOBBLE". REPAIRS INCLUDED, BAR - FRONT SUSPENSION TI, JOINT ASY - BALL,
16	NUT, END ASY - DRAG LINK ROD, ROD, ROD ASY - DRAG LINK, ADJUSTER ASY @ 2, ALL REPLACED WITH NEW PARTS. REPLACE DRAG INK AND END, INSTALL
17	ADJUSTERS FOR CASTOR, FRONT END ALIGNMENT (4 WHEEL DRIVE). THE FORD
18	DEALERSHIP WAS EVEN AWARE OF THIS EXISTING PROBLEM WITH THE FORD F250 SUSPENSION, FROM PREVIOUS COMPLAINS AND REPAIRS. MY REPAIR COST WAS
19	<b>\$1205.07. NOW MY 4 WHEEL DRIVE WILL NOT LOCK IN ON THE FRONT END.</b> I HAVE AN APPOINTMENT, TAKING MY TRUCK BACK TO FORD DEALERSHIP TOMORROW
20	MORNING FOR ADDITIONAL REPAIRS. THIS IS A MAJOR SAFETY ISSUE ON THESE
21	VEHICLES AND SOMETHING MUST BE DONE ABOUT IT. A RECALL SHOULD AND MUST BE MANDATORY FOR THE PUBLIC SAFETY. THIS ISSUE WILL END UP KILLING SOMEONE
22	(IF, IT HAS NOT ALREADY) IF, A RECALL IS NOT ORDERED IMMEDIATELY. *TR 1 Affected Product
23	
24	June 3, 2016 NHTSA ID NUMBER: 10874077
25	Components: SUSPENSION NHTSA ID Number: 10874077
26	Incident Date September 1, 2013
27	Consumer Location DESERT HOT SPRINGS, CA Vehicle Identification Number 1FT7X2B61CE****
28	Summary of Complaint CRASHNo
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1 2	FIRENO INJURIESO DEATHSO SINCE 2013 I HAVE HAD MY FORD F250 INTO THE DEALERSHIP NUMEROUS TIMES WITH
3	COMPLAINTS OF THE FRONT END JUST BEGINNING TO VIOLENTLY SHAKE. THE SHAKING WILL NOT STOP UNTIL THE TRUCK IS STOPPED, AND DURING THAT TIME IT'S
5	SHAKING SO VIOLENTLY IT'S UNCONTROLLABLE. <u>THE DEALERSHIP HAS</u> CONTINUOUSLY TOLD ME IT'S THE TIRES, BUT THE TIRES ARE STILL IN DECENT
6	SHAPE. IT'S HAPPENING AGAIN, AND IT'S VERY SCARY, FOR ME AND MINE, AND OTHERS.
7	1 Affected Product
8	
9	December 27, 2013 NHTSA ID NUMBER: 10557495 Components: STEERING, SUSPENSION, POWER TRAIN
10	NHTSA ID Number: 10557495
11	Incident Date December 2, 2013 Consumer Location RIVERTON, UT
12	Vehicle Identification Number 1FT8W3BTXBE****
13	Summary of Complaint CRASHNo
14	FIRENo
15	INJURIES0 DEATHS0
16	WAS ON FREEWAY ABOUT 55 TO 65 MPH AND ALL OF A SUDDEN THE TRUCK WENT
17	INTO WHAT I WOULD CALL A DEATH WOBBLE WHERE IT SEEMED TO BE SHAKING THE TRUCK TO DEATH. ONCE I PULLED TO THE SIDE OF THE ROAD AND STOPPED AND
18	STARTED OUT AGAIN IT WAS FINE. 2 DAYS LATER IT DID IT AGAIN ONLY THIS TIME I WAS JUST GETTING ONTO THE FREEWAY ON THE ON RAMP. IT DID IT AGAIN. DID NOT SEEM TO HIT ANY BUMP OR POTHOLE JUST STARTED SHAKING. <b>HAD DEALER CHECK</b>
19	ITY OUT THE FOLLOWING WEEK AND THEY BLAMED IT ON THE TIRES, AND SAID IT
20	NEEDED AN ALIGNMENT. *TR 1 Affected Product
21	
22 23	August 28, 2012 NHTSA ID NUMBER: 10472738 Components: STEERING
24	NHTSA ID Number: 10472738
25	Incident Date August 1, 2011 Consumer Location HOUSTON, TX
	Vehicle Identification Number 1FT7W2BT9BE****
26	Summary of Complaint CRASHNo
27	FIRENo
28	INJURIES0 DEATHS0
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1 2 3 4 5 6 7	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING 40 MPH OVER A POT HOLE WHEN THE STEERING WHEEL BEGAN TO SHAKE ABNORMALLY. THE CONTACT WAITED UNTIL THE SHAKING CEASED INDEPENDENTLY HOWEVER, THE FAILURE RECURRED FREQUENTLY. <b>THE VEHICLE WAS TAKEN TO THE DEALER WHO</b> <b>ADVISED THAT THE FAILURE WAS CAUSED BY THE TIRES AND RECOMMENDED</b> <b>HAVING A FRONT END ALIGNMENT PERFORMED. THE CONTACT STATED THAT ALL</b> <b>FOUR TIRES WERE REPLACED AND AN ALIGNMENT WAS PERFORMED HOWEVER,</b> <b>THE FAILURE PERSISTED.</b> THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 10. THE CURRENT MILEAGE WAS 31,000. <b>1 Affected Product</b>
<ul> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ul>	January 22, 2018 NHTSA ID NUMBER: 11064272 Components: SUSPENSION NHTSA ID Number: 11064272 Incident Date January 21, 2018 Consumer Location ANCHORAGE, AK Vehicle Identification Number 1FT7W2BT5BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 FROM DAY 1 I HAVE HAD ISSUES WHERE THE FRONT END WOULD BOUNCE UNCONTROLLABLY AT HIGHWAY SPEEDS AFTER HITTING A POTHOLE OR BRIDGE EXPANSION JOINT. IT'S GETTING WORSE. <u>THE DEALERSHIP CANNNOT FIND ANY</u> PROBLEMS. THEY TOLD ME AT ONE TIME TO REPLACE MY TIRES BUT THAT DID NOT FIX THE ISSUE. I ALMOST RAN OFF THE ROAD 4 TIMES IN ONE TRIP BECAUSE OF THIS AS I COULD NOT MAINTAIN CONTROL. THIS WILL KILL SOMEONE IF NOT RESEARCHED AND CORRECTED BY FORD. 1 Affected Product
20 21 22 23 24 25 26 27 28	July 5, 2017 NHTSA ID NUMBER: 11003164 Components: SUSPENSION, WHEELS NHTSA ID Number: 11003164 Incident Date April 3, 2017 Consumer Location BAKERSFIELD, CA Vehicle Identification Number 1FT7W2BT6BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH OVER A BUMP IN THE ROADWAY, THE VEHICLE SHOOK VIOLENTLY UNTIL SLOWING TO 30 MPH OR -290- Class Action Complaint
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1 2 3 4 5 6	COMING TO A FULL STOP. THERE WERE NO WARNING INDICATORS ILLUMINATED. <u>THE</u> <u>VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THE LOCAL DEALER</u> (JIM BURKE FORD 2001 OAK ST, BAKERSFIELD, CA 93301 (661) 328-3600), BUT THE <u>FAILURE COULD NOT BE DUPLICATED OR DIAGNOSED. THE CONTACT WAS</u> <u>ADVISED TO REPLACE ALL FOUR TIRES. ALL FOUR TIRES WERE REPLACED, BUT</u> <u>THE ISSUE PERSISTED.</u> THE MANUFACTURER WAS NOTIFIED AND REFERRED THE CONTACT TO NHTSA. THE FAILURE MILEAGE WAS 225,000. 1 Affected Product
7 8 9 10	July 2, 2014 NHTSA ID NUMBER: 10607693 Components: SUSPENSION, STEERING NHTSA ID Number: 10607693 Incident Date May 14, 2014 Consumer Location MULDROW, OK Vehicle Identification Number 1FT7X2BTXBE****
<ol> <li>11</li> <li>12</li> <li>13</li> <li>14</li> </ol>	Summary of Complaint CRASHNo FIRENo INJURIESO DEATHSO TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE DRIVING AT 60 MPH ON UNEVEN ROAD PAVEMENT, THE VEHICLE STARTED TO
15 16 17 18	VIBRATE. THE CONTACT ALSO STATED THAT HE REDUCED THE SPEED TO 10 MPH, THE VIBRATION STOPPED. <u>THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS</u> <u>DIAGNOSED THAT ALL FOUR TIRES NEEDED TO BE REPLACED AND BALANCED.</u> <u>THE TECHNICIAN ALSO ALIGNED BOTH FRONT DRIVERS AND PASSENGERS SIDE</u> <u>TIRES. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED.</u> THE VEHICLE WAS TAKEN TO THE DEALER AGAIN BUT THE FAILURE WAS UNABLE TO BE DUPLICATED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE
19 20 21	APPROXIMATE FAILURE MILEAGE WAS 30,000. 1 Affected Product
21 22 23 24	February 5, 2012 NHTSA ID NUMBER: 10446711 Components: SUSPENSION, STEERING NHTSA ID Number: 10446711 Incident Date December 15, 2011 Consumer Location SAINT CHARLES, MO
25 26 27	Vehicle Identification Number 1FT7W2BT1BE**** Summary of Complaint CRASHNo FIRENo INJURIES0
28	DEATHS0 -291- Class Action Complaint
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I WAS DRIVING ON HIGHWAY 55 NORTH IN IMPERIAL MISSOURI WITH MY 3 YR OLD SON IN REAR CAR SEAT WHEN I WENT OVER SOME NORMAL ROAD BUMP AND MY FRONT END STARTED SHAKING SO VIOLENTLY THAT I HAD TO COME TO A COMPLETE STOP TO CORRECT THE SHAKE. THIS ALL HAPPENED IN THE FAST LANE AS I HAD NO WAY TO MOVE TO LEFT OR RIGHT. THANK GOD I WAS NOT BEING TAILGATED! I WAS SCARED HALF TO DEATH AND MY 3YR OLD WAS CRYING SO HARD THAT HE COULDN'T BREATHE! I TOOK IT STRAIGHT TO DEALERSHIP AND THEY DID A TSB FOR A STEERING DAMPENER AND TOLD ME IT WAS FIXED. THE VERY NEXT MORNING IT DID THE VIOLENT SHAKE AGAIN. TOOK IT STRAIGHT BACK TO DEALERSHIP AND THEY HAD A FORD ENGINEER LOOK AT IT AND THEY REPLACED A TRACK BAR BALL JOINT AND SAID IT WAS GOOD NOW. I TOLD THEM THAT I WANTED TO TEST DRIVE IT BEFORE I TOOK IT THIS TIME AND THEY LET ME. STILL HAD THE PROBLEM AND WHEN I TOLD HIM THAT HE SAID THAT THE ENGINEER SAID I NEEDED TO PUT NEW TIRES ON AND A ALIGNMENT BEFORE THEY DO ANYTHING ELSE. THERE IS SOMETHING MORE THAN TIRES AND ALIGNMENT WRONG WITH MY TRUCK!!!!! MY FAMILY TRUCK HAS BECOME A DEATH TRAP!!!! PLEASE HELP WITH THIS MATTER BEFORE SOMEONE IS KILLED! IF THIS WAS YOUR CHILD IN THIS TRUCK YOU WOULD UNDERSTAND MY CONCERN!!! *TR <b>1</b> Affected Product
December 7, 2011 NHTSA ID NUMBER: 10438881 Components: STEERING, SUSPENSION NHTSA ID Number: 10438881 Incident Date December 7, 2011 Consumer Location BIRMINGHAM, AL Vehicle Identification Number 1FT7W2BT3BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 THIS VEHICLE HAS SEVERE FRONT END WOBBLE WHICH MOSTLY OCCURS BETWEEN THE SPEEDS OF 60 - 70 MPH. THE STEERING WHEEL AND ENTIRE VEHICLE BEGINS TO VIOLENTLY WOBBLE SO MUCH THAT USUALLY THE VEHICLE HAS TO BE STOPPED ON THE SIDE OF THE ROAD TO STOP THE WOBBLE. <u>THE DEALERSHIP SUGGESTED NEW</u> <u>TIRES WHICH WE REPLACED HOWEVER THE PROBLEM STILL EXISTS.</u> THE IS A COMMON PROBLEM WE HAVE LEARNED ONLINE WITH THIS MODEL TRUCK. WE ARE VERY CONCERNED THAT THIS PROBLEM MAY CAUSE AN ACCIDENT. *TR 1 Affected Product
May 13, 2013 NHTSA ID NUMBER: 10512156 Components: SUSPENSION, STEERING NHTSA ID Number: 10512156 Incident Date November 1, 2012 Consumer Location CHESAPEAKE, VA -292-
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1	Vehicle Identification Number 1FTWW31R49E**** Summary of Complaint
2	CRASHNo
3	FIRENO
4	INJURIES0 DEATHS0
5	I AM THE ORIGINAL OWNER OF A 2009 FORD F350 SRW DIESEL CREW CAB. AT APPROXIMATELY 70,000 MILES I BEGAN TO EXPERIENCE A STRONG FRONT END
6	VIBRATION; DEATH WOBBLE. WHEN I GO OVER UNEVEN ROADS AT SPEEDS ABOVE 55
7	MPH. THE VIBRATION IS SO GREAT THAT THE STEERING WHEEL REQUIRES A TIGHT HOLD TO KEEP CONTROL OF THE TRUCK. THE VIBRATION CONTINUES UNTIL I SLOW
	DOWN TO AROUND 40 MPH. THIS BECOMES EVEN SCARIER WHEN I AM ON A FREEWAY
8	FLY OVER THAT TURNS AND I HIT AN EXPANSION JOINT. THE TRUCK SHAKES AND
9	TRIES TO PUSH AWAY FROM THE TURN. <u>I TOOK MY TRUCK TO THE DEALER ON</u> FOUR OCCASIONS. THE FIRST VISIT THEY SAID THEY COULD NOT DUPLICATE THE
10	PROBLEM AND THAT I NEEDED NEW TIRES. I BOUGHT NEW TIRES AND IT DID NOT
11	<b><u>CORRECT THE PROBLEM. I TOOK IT BACK THE SECOND TIME AND THEY CHANGED</u> OUT THE BALL JOINTS, TIE RODS, STEERING DAMPER, DID A FRONT END</b>
12	ALIGNMENT AND BALANCED MY WHEELS. IT SEEMED TO WORK FOR A SHORT
13	TIME UNTIL A PART FELL OFF THE FRONT END OF MY TRUCK AND HIT ANOTHER
	ONE BEHIND ME IN THE CAR POOL LANE. I TOOK IT BACK TO THE DEALER TO FIND OUT WHAT I LOST. I WAS TOLD A PART FELL OFF BUT THEY DID NOT WORK NEAR
14	IT. FUNNY THING, IT BEGAN TO VIBRATE AGAIN AFTER THAT. I RECENTLY TOOK
15	IT BACK AND TALKED TO THE TECHNICIAN BEFORE I LEFT THE TRUCK SO HE WOULD UNDERSTAND WHAT IT WAS DOING. HE TOOK IT FOR A DRIVE BUT DID
16	NOT GET IT TO VIBRATE AS I REPORTED TO HIM. HE TOLD ME THAT MY TRUCK
17	DRIVES JUST LIKE ALL F350'S WITHOUT A LOAD. I HAVE PUT MY SLIDE IN CAMPER
18	IN THE BED OF MY TRUCK, 3,500 LBS. AND IT STILL VIBRATES VIOLENTLY. I THINK THAT WOULD BE CONSIDERED A LOAD AND IT TRULY FEELS LIKE A DEATH WOBBLE
19	AS DESCRIBED BY MANY INTERNET POSTINGS. THE FORD REP I SPOKE TO SAID
	THEY ARE NOT AWARE OF ANY PROBLEMS. I AM IN THE PROCESS OF FILING A FORMAL COMPLAINT WITH FORD.
20	1 Affected Product
21	
22	February 8, 2013 NHTSA ID NUMBER: 10496839
23	Components: SUSPENSION
24	NHTSA ID Number: 10496839 Incident Date September 12, 2012
25	Consumer Location RIVERTON, UT
	Vehicle Identification Number 1FTWW31R99E****
26	Summary of Complaint CRASHNo
27	FIRENo
28	INJURIES0 DEATHS0
	-293-
	-293- Class Action Complaint
	Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.294 Page 294 of 353
1 2 3 4 5 6 7 8	TL* THE CONTACT OWNS A 2009 FORD F-350 SD. THE CONTACT STATED THAT WHILE DRIVING 65 MPH, HE DROVE OVER A BUMP IN THE ROAD AND THE FRONT DRIVER SIDE TIRE WOBBLED VIOLENTLY. THE SHAKING DID NOT STOP UNTIL THE VEHICLE SLOWED TO 35 MPH. THE VEHICLE WAS TAKEN TO TWO DIFFERENT DEALERS WHERE IT WAS CONFIRMED THAT THE FRONT HUB HAD SEIZED AND NEEDED TO BE REPLACED ALONG WITH THE GEAR BOX. THE TIRES, SHOCKS, AND DUAL STABILIZERS WERE ALL REPLACED BUT THE FAILURE RECURRED SO THE DEALER ADJUSTED THE STEERING GEAR BOX. THE CONTACT STATED THAT THE FAILURE WAS NOT REMEDIED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 75,000 AND THE CURRENT MILEAGE WAS 99,000. 1 Affected Product
	March 12, 2010 NUTEA ID NUMBED: 10210424
9 10	March 13, 2010 NHTSA ID NUMBER: 10319436 Components: SUSPENSION
10	NHTSA ID Number: 10319436 Incident Date March 12, 2010
11	Consumer Location RAYMOND, NH Vehicle Identification Number 1FTWX31508E****
12	Summary of Complaint
13	CRASHNo FIRENo
	INJURIES0
15	<b>DEATHS0</b> 2008 F-350 HAS WHAT THEY CALL THE "DEATH WOBBLE" AND HAS A CONSTANT SHAKE
16	AT HIGHWAY SPEEDS. FORD BLAMED IT ON THE TIRES. <b><u>I REPLACED TIRES WITH ONE</u></b>
17	OF THE BEST YOU CAN BUY. CONTINUED TO DO THE SAME THING. FORD BLAMED IT ON THOSE TIRES. BEEN IN FOR SERVICE 5 TIMES IN 1 YEAR. DEALERSHIP TOLD
18	ME NOT TO COME BACK BECAUSE THEY CAN'T FIX IT. FORD TELLS ME TO GO
19	BACK TO THE DEALERSHIP. SOMEDAY I'M GOING TO KILL SOMEONE OR MYSELF IN THIS TRUCK SINCE I HAVE NO CONTROL WHEN THE "DEATH WOBBLE" STARTS UNTIL I
20	CAN SLOW DOWN TO ABOUT 20 MPH ON AN INTERSTATE HIGHWAY. UPDATED IVOQ
21	05/26/10 1 Affected Product
22	2 Associated Documents
23	
24	February 7, 2018 NHTSA ID NUMBER: 11067423
25	Components: STEERING
26	NHTSA ID Number: 11067423 Incident Date February 6, 2018
27	Consumer Location RINGWOOD, NJ
	Vehicle Identification Number 1FTSW21Y88E**** Summary of Complaint
28	CRASHNo
	-294-
	Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.295 Page 295 of 353
1 2	FIRENO INJURIESO DEATHSO HAVE BEEN EXPERIENCING THE INFAMOUS "SUPER DUTY DEATH SHAKE" FOR
3	SEVERAL YEARS NOW <u>HAVE HAD DEALER INSPECT THE VEHICLE NUMEROUS</u>
4	TIMES TO NO AVAILALWAYS TOLD IT IS DUE TO TIRE PRESSURE OR WORN TIRESI CHECK PRESSURES REGULARLY AND NEVER HAVE TO ADD MORE THAN A
5	# OR TWONEW TIRES MASK THE PROBLEM BUT IT IS STILL THERESEVERAL
6	ENCOUNTERS HAVE NEARLY CAUSED ACCIDENTSUSUALLY HAPPENS AT
7	HIGHWAY SPEED BUT OCCASIONALLY AT SPEEDS AS LOW AS 35 MPHVIOLENT OSCILLATION AT TIMES HAVE BEEN VERY DANGEROUS SITUATIONSTHIS PROBLEM
8	NEEDS TO BE RECTIFIEDRECEIVED A "RECALL NOTICE RELATED TO THIS ISSUE ON 2/6/2018WAS TOLD BY FORD ON 2/7/2018 THAT THEY HAVE NO PLANS TO FIX THIS
9	DANGEROUS ISSUE
10	1 Affected Product
11	September 4, 2014 NHTSA ID NUMBER: 10629783
12	Components: STEERING, SUSPENSION
13	NHTSA ID Number: 10629783
14	Incident Date February 1, 2014 Consumer Location BISHOP, CA
	Vehicle Identification Number 1FT8W3BT3BE****
15	Summary of Complaint CRASHNo
16	FIRENo
17	INJURIES0 DEATHS0
18	2011 FORD F-350. CONSUMER WRITES IN REGARDS TO SEVERE STEERING WHEEL
19	OSCILLATION PROBLEMS. *SMD THE CONSUMER STATED HE MUST BRING THE VEHICLE TO A COMPLETE STOP, TO GET THE VEHICLE TO STOP SHAKING. IT HAS
20	HAPPENED SEVERAL TIMES. ON TWO OCCASIONS, THE SHAKING WAS BAD THE TREAD
21	SEPARATED FROM THE TIRE. <u>THE VEHICLE WAS TAKEN TO THE DEALER SEVERAL</u> TIMES, AND NOTHING WAS DONE, EXCEPT ROTATING THE TIRES AND CHECKING
22	THE AIR PRESSURE. IN FEBRUARY 2014, THE DEALER REPLACED THE STEERING DAMPER. THE PROBLEM WENT AWAY FOR ABOUT FIVE MONTHS. THE DEALER
23	INFORMED THE CONSUMER, THE VEHICLE NEEDS NEW TIE RODS, FRONT DRIVE
24	LINK, A FRONT TRACK BAR AND AN ALIGNMENT. *JB 1 Affected Product
25	1 Associated Document
26	
27	December 27, 2013 NHTSA ID NUMBER: 10557495
28	Components: STEERING, SUSPENSION, POWER TRAIN NHTSA ID Number: 10557495
20	Incident Date December 2, 2013
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	Class Action Complaint Case No.

c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.296 Page 296 of 353
1 2 3	Consumer Location RIVERTON, UT Vehicle Identification Number 1FT8W3BTXBE**** Summary of Complaint CRASHNo FIRENo
4	INJURIES0
5	DEATHSO WAS ON EDEEWAY ADOUT 55 TO 65 MDU AND ALL OF A SUDDEN THE TOUCK WENT
6	WAS ON FREEWAY ABOUT 55 TO 65 MPH AND ALL OF A SUDDEN THE TRUCK WENT INTO WHAT I WOULD CALL A DEATH WOBBLE WHERE IT SEEMED TO BE SHAKING THE TRUCK TO DEATH. ONCE I PULLED TO THE SIDE OF THE ROAD AND STOPPED AND
7	STARTED OUT AGAIN IT WAS FINE. 2 DAYS LATER IT DID IT AGAIN ONLY THIS TIME I
8	WAS JUST GETTING ONTO THE FREEWAY ON THE ON RAMP. IT DID IT AGAIN. DID NOT SEEM TO HIT ANY BUMP OR POTHOLE JUST STARTED SHAKING <b>. HAD DEALER CHECK</b>
9	ITY OUT THE FOLLOWING WEEK AND THEY BLAMED IT ON THE TIRES, AND SAID IT NEEDED AN ALIGNMENT. *TR
10	1 Affected Product
11	
12	March 3, 2014 NHTSA ID NUMBER: 10566852
13	Components: STEERING NHTSA ID Number: 10566852
14	Incident Date February 22, 2014
15	Consumer Location PUYALLUP, WA Vehicle Identification Number 1FT7X2BT1BE****
	Summary of Complaint
16	CRASHNo
17	FIRENo INJURIESO
18	DEATHS0
19	TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE DRIVING 60 MPH, THE VEHICLE BEGAN SHAKING ABNORMALLY. THE CONTACT TOOK
20	THE VEHICLE TO THE DEALER, WHO STATED THAT THEY WOULD BALANCE ALL
21	FOR TIRES AND PERFORMED AND ALIGNMENT CHECK. THE VEHICLE WAS
22	<b>REPAIRED HOWEVER, THE PROBLEM PERSISTED.</b> THE MANUFACTURER WAS NOT CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS 22,500. *TR <b>1 Affected Product</b>
23	T Affected Troduct
24	August 28, 2012 NHTSA ID NUMBER: 10472738
25	Components: STEERING
26	NHTSA ID Number: 10472738
	Incident Date August 1, 2011 Consumer Location HOUSTON, TX
27	Vehicle Identification Number 1FT7W2BT9BE****
28	Summary of Complaint CRASHNo
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	Class Action Complaint Case No.

Case 3:19-cv-01082-AJB-AHG	Document 1 Filed 06/10/19 of 353	PageID.297	Page 297
FIRENo INJURIES0			
DEATHS0			
	2011 FORD F-250 SD. THE CONTA		
	IE STEERING WHEEL BEGAN TC IE SHAKING CEASED INDEPENI		
	ENTLY. THE VEHICLE WAS TA		,
ADVISED THAT THE FAILU	RE WAS CAUSED BY THE TIRE	S AND RECON	<u>MMENDED</u>
	GNMENT PERFORMED. THE C		
	C <mark>ED AND AN ALIGNMENT WAS</mark> THE MANUFACTURER WAS NOT		
	EAGE WAS 10. THE CURRENT M		
1 Affected Product			
December 8, 2016 NHTSA ID N Components: STEERING, SUS			
NHTSA ID Number: 10933947	I ENSION		
<b>Incident Date</b> December 5, 2016			
<b>Consumer Location</b> VILLAGE			
Vehicle Identification Number	1FT7W2BT8CE****		
Summary of Complaint			
CRASHNo			
FIRENo INJURIES0			
DEATHS0			
	RONT STEERING AND SUSPENSI	ON. <b>KNOWN F</b>	PROBLEM
	INICIANS AND INDEPENDENT		
	E". MOST AFFECTED YEAR MO		
	OBLEM STARTS APPROXIMATE		
	TS USUALLY AFTER A SMALL B		
	NCING IN CAB. I HAD TO COME NCE. <b>THE FORD DEALER REPL</b>		
	CED FOUR TIRES , BALANCED,		
R	HAS CONSTANT VIBRATION I		
	<b>JRRED TWICE SINCE REPAIR.</b>		
	EPORTED AND WELL KNOWN T		
	SUPPOSEDLY FORD REDESIGN		
	S BECAUSE OF THIS PROBLEM. N SILSBEE, TEXAS TOLD ME SH		,
	RUCKS IT IS SUCH A BIG PROBL		Ow will FOR
1 Affected Product			
	UNADED, 10/20202		
September 4, 2014 NHTSA ID N Components: STEERING, SUS			
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Class Action Complaint	-271-		
Case No.			

	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.298 Page 298 of 353
1 2 3 4 5 6 7 8 9 10 11 12 13	NHTSA ID Number: 10629783 Incident Date February 1, 2014 Consumer Location BISHOP, CA Vehicle Identification Number 1FT8W3BT3BE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 2011 FORD F-350. CONSUMER WRITES IN REGARDS TO SEVERE STEERING WHEEL OSCILLATION PROBLEMS. *SMD THE CONSUMER STATED HE MUST BRING THE VEHICLE TO A COMPLETE STOP, TO GET THE VEHICLE TO STOP SHAKING. IT HAS HAPPENED SEVERAL TIMES. ON TWO OCCASIONS, THE SHAKING WAS BAD THE TREAD SEPARATED FROM THE TIRE. <u>THE VEHICLE WAS TAKEN TO THE DEALER SEVERAL</u> <u>TIMES, AND NOTHING WAS DONE, EXCEPT ROTATING THE TIRES AND CHECKING THE AIR PRESSURE. IN FEBRUARY 2014, THE DEALER REPLACED THE STEERING DAMPER. THE PROBLEM WENT AWAY FOR ABOUT FIVE MONTHS. THE DEALER <u>INFORMED THE CONSUMER, THE VEHICLE NEEDS NEW TIE RODS, FRONT DRIVE LINK, A FRONT TRACK BAR AND AN ALIGNMENT.</u> *JB 1 Affected Product 1 Associated Document</u>
14 15	October 22, 2014 NHTSA ID NUMBED, 10640518
15	October 23, 2014 NHTSA ID NUMBER: 10649518 Components: STEERING, SUSPENSION NHTSA ID Number: 10649518
17	Incident Date October 22, 2014
18	Consumer Location ZEBULON, NC Vehicle Identification Number 1FT7W2BT9BE****
19	Summary of Complaint CRASHNo
20	FIRENo
21	INJURIES0 DEATHS0
22	MY HUSBAND WAS DRIVING THROUGH A ROAD CONSTRUCTION WORK ZONE WHEN
	SUDDENLY THE STEERING WHEEL STARTED SHAKING VIOLENTLY AND JUMPED OUT OF HIS HANDS . HE LOST CONTROL OF THE TRUCK . THE OTHER DRIVERS WERE ABLE
23	TO COMPENSATE FOR THE OUT OF CONTROL TRUCK AND AN ACCIDENT WAS AVOIDED
24	. I WENT ON TO RESEARCH THIS ISSUE . I FOUND A FORUM WITH MANY OTHERS HAVING THE SAME ISSUE . <b>MY HUSBAND TOOK IT TO THE LOCAL DEALERSHIP</b>
25	WHERE THEY SAY THEY HAVE NO KNOWLEDGE OF SUCH ISSUES . THEY TOLD HIM
26	IT WAS POOR TIRE PRESSURE OR OUT OF ALIGNMENT . MY HUSBAND HAD BOTH CHECKED AND THERE WAS NO PROBLEM . I FEAR IT IS JUST A MATTER OF TIME
27	BEFORE THERE IS A SEVERE ACCIDENT DUE TO THIS ISSUE . THE OTHERS SAY THE
28	VEHICLE CONTINUES TO DO THE" DEATH WOBBLE" AS IT HAS BEEN COINED ONLINE .
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	Class Action Complaint
	Case No.

¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.299 Page 299 of 353
1 2 3	PLEASE HAVE SOMEONE LOOK INTO THIS PROBLEM . I HAVE ALSO EMAILED FORD MOTOR COMPANY . *TR 1 Affected Product
4	
5	July 24, 2014 NHTSA ID NUMBER: 10615932 Components: WHEELS, STEERING, SUSPENSION NHTSA ID Number: 10615932
6	Incident Date January 3, 2011
-	Consumer Location DUNN, NC
7 8	Vehicle Identification Number 1FT7W2B67BE**** Summary of Complaint
0	CRASHNo
9	FIRENo INJURIESO
10	DEATHS0
11	DEATH RUMBLE: AFTER ANY NEW SET OF TIRES GETS ABOUT 15,000 -20,000 MILES ON
12	THEM, THE INFAMOUS "DEATH RUMBLE" OCCURS ON THIS MODEL TRUCK. WHEN TRAVELING AT SPEEDS OF 60 OR MORE AND YOU TURN OR HIT A BUMP, THE FRONT
	END OF THE VEHICLE STARTS SHAKING AND VIBRATING VIOLENTLY. YOU HAVE TO
13	COME TO AN ALMOST IMMEDIATE STOP IN ORDER TO GET THE VEHICLE TO STOP THE
14	SHAKING. IT IS SO BAD THAT YOU CANNOT CONTROL STEERING AT TIMES AND IS EVEN VISIBLE TO OTHERS NOT IN THE VEHICLE. <b>ALL FORD DEALERS THAT I HAVE</b>
15	SPOKEN WITH ABOUT THIS ARE AWARE OF THE ISSUE BUT BLAME IT ON TIRES OR
16	TIRE PRESSURE. I HAVE TRIED SEVERAL TYPES OF TIRES (AS I KNOW HAVE OVER
	125,000 MILES ON MY TRUCK) AND ALWAYS INFLATE THEM AS PER MY OWNER'S MANUALTHIS DOES NOT HELPNOR DOES ROTATING, BALANCING, CHECKING
17	BRAKES, BALL JOINTS, SUSPENSION, ETC. YOU CAN WATCH MANY MANY VIDEOS OF
18	THIS PROBLEM OF YOUTUBE AND OTHER LOCATIONS, SEE WRITE-UPS IN MAGAZINES,
19	AND AS I SAID, DEALERS EVEN KNOW ABOUT THIS ISSUESO WHY IS IT NOT GETTING
20	CORRECTED??? *TR 1 Affected Product
21	
22	September 9, 2012 NHTSA ID NUMBER: 10474424 Components: STEERING, SUSPENSION, WHEELS
23	NHTSA ID Number: 10474424
24	Incident Date May 1, 2012
	Consumer Location MORGANTOWN, WV
25	Vehicle Identification Number 1FT7W2BT1BE**** Summary of Complaint
26	CRASHNo
27	FIRENO
28	INJURIES0 DEATHS0
20	
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	Class Action Complaint
	Case No.

C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.300 Page 300 of 353
1 2 3 4 5 6 7 8 9	DRIVING APPROXIMATELY 45 MPH ON A STATE HIGHWAY, MAKING A SLIGHT LEFT TURN, HIT A SMALL BUMP IN THE ROAD, AND THE STEERING WHEEL STARTED JERKING VIOLENTLY FROM LEFT TO RIGHT FROM THE 9:00 TO 3:00 POSITIONS. I COULD NOT STOP IT WITH BOTH HANDS. I HAD TO BRAKE THE VEHICLE TO ALMOST A COMPLETE STOP TO END THE JERKING. THIS HAS BEEN HAPPENING ON ALMOST A DAILY BASIS. THE VEHICLE CURRENTLY HAS 22,193 MILES ON IT. <u>IT HAS BEEN TO THE DEALERSHIP AT LEAST 4 TIMES AND THEY HAVE BEEN CALLED NUMEROUS TIMES WITH THE PROBLEM. THEY HAVE CHECKED THE TIRE PRESSURE SEVERAL TIMES. THE FRONT END. CHANGED THE STEERING DAMPER, WHICH SLIGHTLY HELPED FOR ABOUT 500 MILES. IT IS NOW HAPPENING AT LOWER SPEEDS, AROUND 30 MPH AND UP. *TR 1 Affected Product</u>
10	Mar 20, 2012 NUTERA ID NUMBED, 10450026
11	May 29, 2012 NHTSA ID NUMBER: 10459926 Components: STEERING, SUSPENSION
	NHTSA ID Number: 10459926
12	Incident Date May 29, 2012 Consumer Location MIDLAND, TX
13	Vehicle Identification Number N/A
14	Summary of Complaint CRASHNo
15	FIRENO
16	INJURIESO
	<b>DEATHS0</b> WHILE DRIVING ABOUT 60MPH ON LOOP 250 HERE IN MIDLAND, TX I WENT OVER AN
17	OVERPASS CHANGING FROM THE PAVEMENT TO CONCRETE. AT THAT POINT I
18	COMPLETELY LOST CONTROL OF THE VEHICLE DUE TO VERY BAD FRONT WHEEL
19	WOBBLE. I WAS ONLY ABLE TO REGAIN CONTROL BY COMING TO ALMOST A COMPLETE STOP VERY CLOSELY AVOIDING AN ACCIDENT. I HAVE NOTICED THIS
20	DEATH WOBBLE BEFORE ON MY 2007 FORD F-250 AND NOW IT HAS STARTED ON MY
	2010. I TOOK THE 2007 TO THE DEALER MANY TIMES AND THEY COULD NEVER
21	DUPLICATE THE PROBLEM OR WOULD USE AN EXCUSE THAT THEY ADJUSTED THE
22	AIR PRESSURE ON TIRES. THIS PROBLEM IS A MAJOR ISSUE AND WILL CAUSE SERIOUS ACCIDENTS IF IT HAS NOT ALREADY. AFTER ARRIVING AT WORK I SEARCHED THE
23	INTERNET FOR OTHERS WITH SIMILAR PROBLEMS AND IT SEEMS ALL FORD F-250 4X4'S
24	HAVE THE SAME ISSUE ALL THEY WAY UP TO THE CURRENT MODEL. THERE ARE TONS
	OF YOUTUBE VIDEOS SHOWING EXACTLY WHAT HAPPENED TO ME STATING THAT FORD WILL NOT CORRECT THE PROBLEM. SOMETHING NEEDS TO BE DONE!
25	HTTP://WWW.YOUTUBE.COM/WATCH?V=8EUQ6F8RGT4
26	HTTP://WWW.YOUTUBE.COM/WATCH?V=PSDBCV-GCS8
27	HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER- DUTY/T0SGDCTMOBHE5JER1/P13 HTTP://WWW.RACE-
28	DEZERT.COM/FORUM/SHOWTHREAD.PHP/82022-F250-QUOT-DEATH-WOBBLE-QUOT-
20	STEERING-ISSUE. *TR
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	Class Action Complaint Case No.

c	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.301 Page 301 of 353
1	1 Affected Product
3	April 23, 2013 NHTSA ID NUMBER: 10509217
4	Components: STEERING, SUSPENSION
5	NHTSA ID Number: 10509217 Incident Date December 3, 2012
	Consumer Location BROCKPORT, NY Vehicle Identification Number N/A
6	Summary of Complaint
7	CRASHNo FIRENo
8	INJURIES0
9	DEATHS0 THIS TRUCK HAS DEVELOPED THE "DEATH" WOBBLE. IF I HIT A BUMP, BRIDGE JOINT IT
10	WILL SEND THE TRUCK INTO AN INSTANT WOBBLE THAT IS SO VIOLENT YOU HAVE TO
11	SLOW TO ABOUT 20MPH TO STOP IT. VERY DANGEROUS AT HIGHWAY SPEEDS AS YOU CANNOT KEEP LANE CONTROL. ALREADY DESTROYING THE FRONT TIRES AND
12	DEALERS HAVE SAID TO KEEP PROPER AIR PRESSURE. I HAVE BEEN AN AUTO
13	MECHANIC FOR OVER 15 YRS NOW AND THAT IS THE BEST EXCUSE THE DEALER HAS. FORD KNOWS THERE IS A PROBLEM BUT SAID THERE IS NOT ENOUGH
14	COMPLAINTS. I HAVE DONE A SEARCH AND CAME UP WITH OVER 18,000 HITS ON
15	GOOGLE FOR THIS TOPIC ALONE. PLEASE ASSIST WITH KEEPING US SAFE AND DEMAND A FIX AND RECALL BEFORE PEOPLE ARE KILLED DRIVING OR EVEN BEING NEAR THIS
16	VEHICLE. *TR
17	1 Affected Product
18	
10	March 12, 2013 NHTSA ID NUMBER: 10502520 Components: STEERING, SUSPENSION, WHEELS
	NHTSA ID Number: 10502520
20	Incident Date March 1, 2010 Consumer Location ANNVILLE, PA
21	Vehicle Identification Number N/A Summary of Complaint
22	CRASHNo
23	FIRENo INJURIES0
24	DEATHS0
25	I WAS DRIVING MY 2009 F-250 TRAVELING ABOUT 40 TO 45 MPH AND AFTER HITTING A ROUGH PATCH OF ROAD THE WHEELS BEGAN TO SHAKE OUT OF CONTROL FOR ABOUT
26	20 SECONDS. I HAVE HAD MY TRUCK TO THE DEALERSHIP FOR THE SAME
27	PROBLEM ON 6 PLUS TIMES. FORD STATES THAT IT WAS A TIRE PRESSURE ISSUEBS! BS! EACH TIME FORD HAS MY TRUCK THEY SAY WE HAVE FIXED
28	THE PROBLEM AND IT SHOULD NOT OCCUR AGAIN. THE LAST TIME I LEFT FORD AND
	SPENT 165.00\$ ON A DAMPER ROD TO FIX THIS PROBLEM I DROVE 18 MILES DOWN THE -301-
	Class Action Complaint
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C	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.302 Page 302 of 353
1 2 3 4 5 6	ROAD AND WENT INTO A "DEATH WOBBLE AGAIN. I TURNED THE TRUCK AROUND AND IT IS SITTING AT FORD AS I WRITE THIS POST. AFTER REVIEWING THIS MATTER ON LINE I HAVE NOTICED THAT THERE ARE MORE F-250'S WITH THE SAME ISSUE. A FEDERAL RECALL NEEDS TO BE DONE AND FAST. SEVERAL TIMES THAT THE "DEATH WOBBLE " AS OCCURRED TO ME , I HAVE BEEN LUCKY SO FAR TO DRIVE OUT OF IT WITH OUT A PROBLEM. I MIGHT NOT BE SO LUCKY NEXT TIME. A FEDERAL RECALL NEEDS TO BE DONE FAST!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
7 8 9	February 7, 2018 NHTSA ID NUMBER: 11067423 Components: STEERING NHTSA ID Number: 11067423 Incident Date February 6, 2018
10 11 12	Consumer Location RINGWOOD, NJ Vehicle Identification Number 1FTSW21Y88E**** Summary of Complaint CRASHNo FIRENo
13 14	INJURIESO DEATHSO HAVE BEEN EXPERIENCING THE INFAMOUS "SUPER DUTY DEATH SHAKE" FOR SEVERAL YEARS NOW <u>HAVE HAD DEALER INSPECT THE VEHICLE NUMEROUS</u>
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> </ol>	TIMES TO NO AVAILALWAYS TOLD IT IS DUE TO TIRE PRESSURE OR WORN TIRESI CHECK PRESSURES REGULARLY AND NEVER HAVE TO ADD MORE THAN A # OR TWONEW TIRES MASK THE PROBLEM BUT IT IS STILL THERESEVERAL ENCOUNTERS HAVE NEARLY CAUSED ACCIDENTSUSUALLY HAPPENS AT HIGHWAY SPEED BUT OCCASIONALLY AT SPEEDS AS LOW AS 35 MPHVIOLENT OSCILLATION AT TIMES HAVE BEEN VERY DANGEROUS SITUATIONSTHIS PROBLEM NEEDS TO BE RECTIFIEDRECEIVED A "RECALL NOTICE RELATED TO THIS ISSUE ON 2/6/2018WAS TOLD BY FORD ON 2/7/2018 THAT THEY HAVE NO PLANS TO FIX THIS DANGEROUS ISSUE 1 Affected Product
<ul> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ul>	March 26, 2013 NHTSA ID NUMBER: 10504525 Components: SUSPENSION, STEERING NHTSA ID Number: 10504525 Incident Date December 7, 2010 Consumer Location FORT WORTH, TX Vehicle Identification Number 1FTSW21R78E**** Summary of Complaint CRASHNo
27 28	FIRENo INJURIESO DEATHSO -302-
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.303 Page 303 of 353
1 2 3 4	BEGAN IN 2010DEATH WOBBLEHITTING A BUMP, STEERING WHEEL SHAKES VIOLENTLYLOSS OF CONFIDENCE IN THE ABILITY OF THE VEHICLE TO PROVIDE SAFE TRANSPORTATION <b>DEALERSHIP VISIT WAS NOT HELPFULSAID IT WAS TIRE</b> <u>PRESSUREADDED A DIFFERENT TRAC BAR IN 2012</u> HELPED SOME BUT TIL PRODUCES THE WOBBLE AT LOWER SPEEDS. *TR 1 Affected Product
5	
6	December 6, 2018 NHTSA ID NUMBER: 11156683
7	Components: STEERING
-	NHTSA ID Number: 11156683 Incident Date November 7, 2018
8	Consumer Location LAKE GENEVA, WI
9	Vehicle Identification Number 1FT7W2BT8HE****
10	Summary of Complaint
	CRASHNo FIRENo
11	INJURIES0
12	DEATHS0
13	WHILE DRIVING AT NORMAL HIGHWAY SPEEDS IN NORMAL DRIVING CONDITIONS
	AFTER COMING TO A BUMP IN THE ROAD OR EXPANSION CRACK THE TRUCK STEERING WHEEL STARTS TO SHAKE VIOLENTLY. THIS WILL CONTINUE UNTIL THE TRUCK IS
14	SLOWED DOWN TO ABOUT 30 MPH. THE TRUCK WILL AT TIMES MOVE ACROSS LANES
15	OF TRAFFIC AND INTO ONCOMING TRAFFIC. THE DEALER WAS MADE AWARE AND
16	<b>REPLACED THE STEERING STABILIZER. THE PROBLEM RETURNED RIGHT AWAY.</b>
17	THE TRUCK IS SCHEDULED FOR REPAIR AGAIN DEC 17 2018 1 Affected Product
18	
19	July 24, 2017 NHTSA ID NUMBER: 11010308
20	Components: SUSPENSION NHTSA ID Number: 11010308
	Incident Date February 15, 2015
21	Consumer Location COLORADO SPRINGS, CO
22	Vehicle Identification Number 1FT8W3BT0DE**** Summary of Complaint
23	CRASHNo
24	FIRENo
	INJURIES0
25	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2013 FORD F-350. ON SEVERAL OCCASIONS, WHILE DRIVING
26	55 MPH, THE VEHICLE VIOLENTLY SHOOK WHEN MAKING CONTACT WITH A BUMP. THE
27	CONTACT STATED THAT THE STEERING WHEEL BECAME DIFFICULT TO MANEUVER
	WHEN THE SHAKING OCCURRED AND THE CHECK ENGINE WARNING INDICATOR ILLUMINATED. THE VEHICLE WAS TAKEN TO PHIL LONG FORD OF MOTOR CITY
28	(1212 MOTOR CITY DR, COLORADO SPRINGS, CO 80905 (719) 694-3487) WHERE THE
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¢	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.304 Page 304 of 353
1 2 3 4 5	<b>FAILURE WAS DIAGNOSED AS THE (DEATH WOBBLE). THE BALL JOINTS, TRACKING</b> <b>BAR BUSHINGS, SPRING MOUTH, STEERING STABILIZER SHOCK, AND ALL FOUR</b> <b>TIRES NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE</b> <b>RECURRED.</b> THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS OFFERED. THE FAILURE MILEAGE WAS 53,000. <b>1 Affected Product</b>
6 7 8 9	September 24, 2012 NHTSA ID NUMBER: 10476818 Components: STEERING NHTSA ID Number: 10476818 Incident Date June 12, 2012 Consumer Location SEARCY, AR Vehicle Identification Number 1FT7W2BT8BE****
10 11 12	Summary of Complaint CRASHNo FIRENo INJURIES0
13	DEATHSO TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE TRAVELING 70 MPH, HE DROVE OVER A BUMP AND THE VEHICLE BEGAN TO SHAKE
14 15	VIOLENTLY. THE CONTACT MENTIONED THAT HE HAD TO DECELERATE SINCE THE VEHICLE FELT AS IF IT WAS GOING TO CRASH. <u>THE VEHICLE WAS TAKEN TO THE</u> DEALER WHO STATED THAT THE STEERING STABILIZER SHOCK NEEDED TO BE
16 17	<b>REPLACED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED.</b> THE MANUFACTURER WAS MADE AWARE OF THE FAILURE WHO DID NOT OFFER ANY ASSISTANCE. THE FAILURE MILEAGE WAS 23,000. UPDATED 10/31/12*LJ UPDATED
18 19 20	10/31/12 1 Affected Product 1 Associated Document
20 21	May 30, 2017 NHTSA ID NUMBER: 10992335
22	Components: SUSPENSION, SERVICE BRAKES, HYDRAULIC NHTSA ID Number: 10992335
23 24	Incident Date May 20, 2017 Consumer Location BROOKEVILLE, MD Vehicle Identification Number 1FT7X2B69BE****
25	Summary of Complaint CRASHNo
26 27	FIRENo INJURIESO
28	DEATHS0 TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING OVER 60 MPH, THE VEHICLE SHOOK AND THE STEERING WHEEL LOCKED. WHILE THE BRAKE PEDAL WAS -304-
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1 2 3 4 5 6	DEPRESSED, THE VEHICLE SHOOK UNCONTROLLABLY. THERE WERE NO WARNING INDICATORS ILLUMINATED. <u>THE VEHICLE WAS TAKEN TO THE DEALER (KOONS</u> <u>SILVER SPRING FORD, 3111 AUTOMOBILE BLVD, SILVER SPRING, MD 20904 (301) 890-</u> <u>6100) WHERE IT WAS DIAGNOSED THAT THE BALL JOINT, BRAKE PADS, AND</u> <u>STABILIZER BAR NEEDED TO BE REPLACED. ALSO, FLUID WAS LEAKING ON THE</u> <u>SHOCKS AND THE STRUT NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED,</u> <u>BUT THE FAILURES RECURRED.</u> THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURES. THE FAILURE MILEAGE WAS 58,100. 1 Affected Product			
7 8 9	February 8, 2013 NHTSA ID NUMBER: 10496896 Components: SUSPENSION NHTSA ID Number: 10496896 Incident Date July 9, 2011			
10 11 12	Consumer Location KENNARD, NE Vehicle Identification Number N/A Summary of Complaint CRASHNo			
13 14	FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE			
15 16 17 18	DRIVING 40 MPH, THE FRONT END SHIMMERED SEVERELY WHEN THE VEHICLE HIT A BUMP. <u>THE VEHICLE WAS TAKEN TO THE DEALER FOUR TIMES WHO REPLACED</u> <u>THE BALL JOINTS AND STABILIZER ARM BUT THE FAILURE RECURRED.</u> THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 30,000 AND THE CURRENT MILEAGE WAS 68,000. THE VIN WAS UNAVAILABLE. 1 Affected Product			
19				
20 21	December 5, 2012 NHTSA ID NUMBER: 10487446 Components: SUSPENSION NHTSA ID Number: 10487446			
22	Incident Date February 1, 2012 Consumer Location MOUNTVILLE, PA			
23 24	Vehicle Identification Number 1FT7X2B64BE**** Summary of Complaint			
24	CRASHNo FIRENo			
26	INJURIES0 DEATHS0			
27	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING APPROXIMATELY 50 MPH OVER A ROAD BUMP WHEN THE FRONT END OF THE VEHICLE			
28	BEGAN TO SHAKE VIOLENTLY. <u>THE VEHICLE WAS TAKEN TO AN AUTHORIZED</u> DEALER THREE TIMES FOR THE FAILURE. THE STEERING STABILIZER AND FRONT			
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# END SHOCKS WERE REPLACED AT DIFFERENT TIMES. THE FAILURE RECURRED AFTER THE REPAIRS WERE PERFORMED WHENEVER DRIVING OVER A ROAD BUMP

**OR POTHOLE.** THE MANUFACTURER WAS NOTIFIED OF THE PROBLEM. THE APPROXIMATE FAILURE MILEAGE WAS 28,848. **1 Affected Product** 

### D. Ford's Actions Harmed Consumers and Placed Public Safety at Risk

54. Ford's acts and omissions as described above have unnecessarily put the safety of Class Members and the public in jeopardy.

55. Further, because of Defendant's unfair, deceptive and/or fraudulent business practices, owners and/or lessees of the Class Vehicles, including Plaintiff, have suffered an ascertainable loss of money and/or property and/or loss in value. The unfair and deceptive trade practices committed by Defendant were conducted in a manner giving rise to substantial aggravating circumstances.

56. Had Plaintiff and other Class Members known of the Defect at the time of purchase or lease, they would not have bought or leased the Class Vehicles or would have paid substantially less for them.

57. As a result of the Defect and the monetary costs associated with attempting to repair them, Plaintiff and the Class Members have suffered injury in fact, incurred damages, and have otherwise been harmed by Defendant's conduct. Accordingly, Plaintiff brings this action to redress Defendant's violations of the consumer protection statutes of California also seek recovery for Defendant's breach of express warranty, breach of implied warranty, breach of the duty of good faith and fair dealing, and fraudulent concealment.

1.

# **Defendants' Warranty-Related Practices**

58. Defendant issued a "New Vehicle Limited Warranty" with each Class Vehicle.

59. Under the basic New Vehicle Limited Warranty, Defendant agreed to repair defects reported within the earlier of 3 years or 36,000 miles. The 2011 Ford F-Series Warranty manual provides that:

You will not be charged for repairs covered by any applicable warranty during the stated coverage periods, unless specifically stated elsewhere in this guide.

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1	Sometimes Ford may offer a special adjustment program to pay all or part of the cost of certain repairs beyond the terms of the applicable warranty.				
2					
3 4	The New Vehicle Limited Warranty and the Emissions Warranties described in this booklet apply to your vehicle if:				
5	• it was originally purchased through the Ford Export Operations Military Sales Program; or				
6	• it was originally sold or leased by Ford Motor Company or one of its				
7 8	dealers in the United States or U.S. Federalized Territories, and it was originally registered/licensed and operated in the United States, U.S. Federalized Territories, or Canada.				
9					
10	You may have some implied warranties. For example, you may have an				
11	implied warranty of merchantability (that the car or light truck is reasonably fit for the general purpose for which it was sold)				
12	60. Defendant instructs vehicle owners and lessees to bring their vehicles to a Ford				
13	dealership for the warranty repairs. Many owners and lessees have presented Class Vehicles to Ford				
14	dealerships with complaints related to the Defect.				
15	61. Defendant has evaded its warranty obligations by failing to tell consumers that their				
16	vehicles are defective and by representing that the cause of the defect is the owner's neglect to properly				
17	maintain the vehicle. This representation, however, is false as the Class Vehicles are inherently defective				
18	and will inevitably fail.				
19	62. Once again, a review of the NHTSA complaint database reveals that the Death Wobble				
20	Defect manifests for the first time within the New Vehicle Limited Warranty, sometimes as early as				
21	when the vehicle has less than one thousand miles on the odometer. But the Death Wobble Defect also				
22	frequently manifests for the first time shortly after the expiration of the New vehicle Limited Warranty.				
23	63. Of the 1,265 customer complaints registered in the NHTSA database, 395 of the				
24	complaints indicated the approximate mileage at which the complainant first experienced the Death				
25	Wobble Defect in the F-Series Super Duty vehicle. Of that number, 55% (222 out of ) of the complaints				
26	indicated that the Death Wobble Defect first manifested when the vehicle had less than 36,000 on the				
27	odometer, and of those, 30 complainants first experienced the Death Wobble Defect when their vehicles				
28	had less than 5,000 miles. Of the 175 complainants that first experienced the Death Wobble Defect				
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outside of the New Vehicle Limited Warranty mileage threshold, 34 of the complainants first

experienced the Death Wobble Defect when their vehicle was less than 5,000 miles outside of the 3 warranty mileage period.

4

5

1

2

64. The following table shows the reported approximate mileage of the onset of the Death Wobble Defect in all NHTSA complaints in which the mileage was referenced:

6	In-Warranty		
7		NHTSA ID No.	Mileage
	1	10341943	Brand New
8	2	10264951	Brand New
9	3	10352676	Brand New
10	4	10358161	Fairly New
	5	10360616	Almost New
11	6	10472738	10
12	7	10197626	50
13	8	10445228	100
	9	10822088	120
14	10	10282585	200
15	11	10204597	300
	12	10256489	300
16	13	10877122	400
17	14	10235160	500
18	15	10235162	700
	16	10563279	1,000
19	17	11144412	1,000
20	18	10204049	1,100
21	19	11150956	1,500
	20	10483603	<2,000
22	21	10440829	2,000
23	22	10471247	2,000
	23	11164685	2,400
24	24	10822406	3,000
25	25	10532703	3,000
26	26	10392304	4,000
	27	10244101	4,000
27	28	10238850	4,000
28	29	10475859	4,000

30 $10190731$ $<5,000$ $31$ $10575590$ $5,400$ $32$ $11132857$ $5,800$ $33$ $11157006$ $<6,000$ $34$ $10267467$ $6,000$ $35$ $10495993$ $6,000$ $36$ $10499454$ $6,000$ $37$ $10253789$ $7,000$ $38$ $11092264$ $7,000$ $39$ $11120417$ $7,000$ $40$ $11157298$ $7,909$ $41$ $10236342$ $8,000$ $42$ $10257681$ $8,000$ $43$ $11156845$ $8,000$ $44$ $1132889$ $8,200$ $45$ $11164678$ $8,500$ $46$ $10552681$ $9,000$ $47$ $10511730$ $9,000$ $48$ $10411981$ $9,800$ $49$ $11073393$ $9,800$ $50$ $10265894$ $10,000$ $51$ $10215739$ $10,000$ $52$ $10185954$ $10,000$ $53$ $10281566$ $10,000$ $54$ $10199973$ $10,000$ $55$ $10660588$ $10,000$ $56$ $11133226$ $10,000$ $57$ $11122943$ $10,100$ $58$ $11131155$ $10,959$ $59$ $10280243$ $11,000$ $60$ $10177882$ $11,000$	20	10100701	5 000
32 $11132857$ $5,800$ $33$ $11157006$ $<6,000$ $34$ $10267467$ $6,000$ $35$ $10495993$ $6,000$ $36$ $10499454$ $6,000$ $37$ $10253789$ $7,000$ $38$ $11092264$ $7,000$ $39$ $11120417$ $7,000$ $40$ $11157298$ $7,909$ $41$ $10236342$ $8,000$ $42$ $10257681$ $8,000$ $43$ $11156845$ $8,000$ $44$ $11132889$ $8,200$ $45$ $11164678$ $8,500$ $46$ $10552681$ $9,000$ $47$ $10511730$ $9,000$ $48$ $10411981$ $9,800$ $49$ $11073393$ $9,800$ $50$ $10265894$ $10,000$ $51$ $10215739$ $10,000$ $52$ $10185954$ $10,000$ $53$ $10281566$ $10,000$ $54$ $10199973$ $10,000$ $55$ $10660588$ $10,000$ $56$ $11133226$ $10,000$ $57$ $11122943$ $10,100$ $58$ $11131155$ $10,959$ $59$ $10280243$ $11,000$	30	10190731	<5,000
33 $11157006$ $<6,000$ $34$ $10267467$ $6,000$ $35$ $10495993$ $6,000$ $36$ $10499454$ $6,000$ $37$ $10253789$ $7,000$ $38$ $11092264$ $7,000$ $39$ $11120417$ $7,000$ $40$ $11157298$ $7,909$ $41$ $10236342$ $8,000$ $42$ $10257681$ $8,000$ $43$ $11156845$ $8,000$ $44$ $11132889$ $8,200$ $45$ $11164678$ $8,500$ $46$ $10552681$ $9,000$ $47$ $10511730$ $9,000$ $48$ $10411981$ $9,800$ $49$ $11073393$ $9,800$ $50$ $10265894$ $10,000$ $51$ $10215739$ $10,000$ $52$ $10185954$ $10,000$ $53$ $10281566$ $10,000$ $54$ $10199973$ $10,000$ $55$ $10660588$ $10,000$ $57$ $11122943$ $10,100$ $58$ $11131155$ $10,959$ $59$ $10280243$ $11,000$			5,400
34102674676,00035104959936,00036104994546,00037102537897,00038110922647,00039111204177,00040111572987,90941102363428,00042102576818,00043111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000		11132857	5,800
35104959936,00036104994546,00037102537897,00038110922647,00039111204177,00040111572987,90941102363428,00042102576818,00043111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	33	11157006	<6,000
36 $10499454$ $6,000$ $37$ $10253789$ $7,000$ $38$ $11092264$ $7,000$ $39$ $11120417$ $7,000$ $40$ $11157298$ $7,909$ $41$ $10236342$ $8,000$ $42$ $10257681$ $8,000$ $43$ $11156845$ $8,000$ $44$ $11132889$ $8,200$ $45$ $11164678$ $8,500$ $46$ $10552681$ $9,000$ $47$ $10511730$ $9,000$ $48$ $10411981$ $9,800$ $50$ $10265894$ $10,000$ $51$ $10215739$ $10,000$ $52$ $10185954$ $10,000$ $53$ $10281566$ $10,000$ $54$ $10199973$ $10,000$ $55$ $10660588$ $10,000$ $56$ $11133226$ $10,000$ $57$ $11122943$ $10,100$ $58$ $11131155$ $10,959$ $59$ $10280243$ $11,000$	34	10267467	6,000
37102537897,00038110922647,00039111204177,00040111572987,90941102363428,00042102576818,00043111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	35	10495993	6,000
38         11092264         7,000           39         11120417         7,000           40         11157298         7,909           41         10236342         8,000           42         10257681         8,000           43         11156845         8,000           44         11132889         8,200           45         11164678         8,500           46         10552681         9,000           47         10511730         9,000           48         10411981         9,800           49         11073393         9,800           50         10265894         10,000           51         10215739         10,000           52         10185954         10,000           53         10281566         10,000           54         10199973         10,000           55         10660588         10,000           56         11133226         10,000           57         11122943         10,100           58         11131155         10,959           59         10280243         11,000	36	10499454	6,000
39111204177,00040111572987,90941102363428,00042102576818,00043111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	37	10253789	7,000
40111572987,90941102363428,00042102576818,00043111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	38	11092264	7,000
41102363428,00042102576818,00043111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000571112294310,100581113115510,959591028024311,000	39	11120417	7,000
42102576818,00043111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000571112294310,100581113115510,959591028024311,000	40	11157298	7,909
43111568458,00044111328898,20045111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000571112294310,100581113115510,959591028024311,000	41	10236342	8,000
44111328898,20045111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	42	10257681	8,000
45111646788,50046105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	43	11156845	8,000
46105526819,00047105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	44	11132889	8,200
47105117309,00048104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	45	11164678	8,500
48104119819,80049110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	46	10552681	9,000
49110733939,800501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	47	10511730	9,000
501026589410,000511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	48	10411981	9,800
511021573910,000521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	49	11073393	9,800
521018595410,000531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	50	10265894	10,000
531028156610,000541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	51	10215739	10,000
541019997310,000551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	52	10185954	10,000
551066058810,000561113322610,000571112294310,100581113115510,959591028024311,000	53	10281566	10,000
561113322610,000571112294310,100581113115510,959591028024311,000	54	10199973	10,000
571112294310,100581113115510,959591028024311,000	55	10660588	10,000
581113115510,959591028024311,000	56	11133226	10,000
59 10280243 11,000	57	11122943	10,100
	58	11131155	10,959
60 10177882 11,000	59	10280243	11,000
	60	10177882	11,000

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1	61	10266842	11,000
2	62	10526035	11,300
	63	10183787	12,000
3	64	10253778	12,000
4	65	10439875	12,000
5	66	10273332	12,000
	67	10251226	12,000
6	68	10416598	12,000
7	69	10229151	12,000
8	70	10504688	12,000
	71	11163281	12,000
9	72	11170395	12,161
10	73	10277365	12,900
	74	11084855	13,000
11	75	11151372	13,000
12	76	11172009	13,000
13	77	10265529	14,000
	78	11054256	14,000
14	79	11064990	14,000
15	80	11166300	14,000
16	81	11066716	14,000
10	82	11156669	14,700
17	83	10356330	15,000
18	84	10402591	15,000
	85	10359276	15,000
19	86	10262107	15,000
20	87	11081940	15,000
21	88	11160778	15,000
	89	10283392	<16,000
22	90	10197931	16,000
23	91	11075516	16,000
24	92	11170357	16,000
	93	10246512	17,000
25	94	10916472	17,000
26	95	11163498	17,000
	96	11173650	17,000
27	97	11173650	17,000
28	98	11100797	17,000

		1
99	10198430	17,600
100	10198762	18,000
101	10238374	18,000
102	10206556	18,000
103	10320462	18,000
104	11119353	18,000
105	10557891	18,750
106	11065587	<19,000
107	10298418	19,000
108	10823993	19,000
109	11080144	19,500
110	10789577	<20,000
111	10788327	<20,000
112	10819770	<20,000
113	10231489	20,000
114	10230072	20,000
115	10493165	20,000
116	10268431	20,000
117	10576849	20,000
118	10363678	20,000
119	11092739	20,000
120	11013478	20,000
121	10664333	20,000
122	11163834	20,000
123	11118215	20,000
124	11163559	20,000
125	11165507	20,000
126	10255935	20,789
127	11141552	21,000
128	11154687	21,500
129	10222609	21,977
130	10680495	22,000
131	10247920	22,065
132	10474424	<22,193
133	10566852	22,500
134	10323973	22,900
135	10265630	<23,000
136	10282830	23,000

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1	137	10277968	23,000
2	138	10256667	23,000
	139	10476818	23,000
3	140	10425765	23,400
4	141	10433960	23,500
5	142	10984255	23,766
	143	10422634	24,000
6	144	10330354	24,000
7	145	11133421	24,000
0	146	11151224	24,000
8	147	11139700	24,000
9	148	10287227	24,200
10	149	11072675	24,700
	150	10268747	24,900
11	151	10294472	<25,000
12	152	10272963	25,000
13	153	10281464	25,000
	154	10332021	25,000
14	155	10458496	25,000
15	156	10197717	25,000
10	157	10193596	25,000
16	158	11001691	25,000
17	159	10561609	25,000
18	160	11165555	25,000
	161	11154123	25,000
19	162	11165469	25,000
20	163	10204198	<26,000
21	164	10319537	26,000
	165	10354176	26,000
22	166	10351350	26,000
23	167	10465237	<26,505
	168	10253969	<27,000
24	169	11051493	27,000
25	170	11156425	27,000
26	171	10538054	27,600
	172	11155371	27,800
27	173	10246054	<28,000
28	174	10310422	28,000

176 $10786578$ $28,000$ $177$ $11151155$ $28,000$ $178$ $11153642$ $28,000$ $179$ $11173911$ $28,412$ $180$ $10487446$ $28,848$ $181$ $10439931$ $<29,000$ $182$ $10278427$ $29,000$ $183$ $10299121$ $29,000$ $184$ $10849651$ $29,000$ $185$ $10486420$ $29,800$ $186$ $11141310$ $29,947$ $187$ $11114415$ $<30,000$ $188$ $10340601$ $30,000$ $190$ $10375410$ $30,000$ $191$ $10491015$ $30,000$ $192$ $10845889$ $30,000$ $193$ $10496896$ $30,000$ $194$ $10607693$ $30,000$ $195$ $10560105$ $30,000$ $196$ $10578052$ $30,000$ $197$ $11171514$ $30,000$ $198$ $11172828$ $30,000$ $199$ $10360446$ $31,000$ $200$ $10211208$ $31,000$ $201$ $10246537$ $31,000$ $202$ $10395796$ $31,000$ $204$ $10272506$ $32,000$ $205$ $10349764$ $32,000$ $206$ $10560393$ $32,000$ $207$ $10721166$ $33,000$ $208$ $10304590$ $33,481$ $209$ $10439094$ $<33,500$ $210$ $10277958$ $34,000$	175	10477222	20 000
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2061056039332,0002071072116633,0002081030459033,48120910439094<33,500			32,000
207         10721166         33,000           208         10304590         33,481           209         10439094         <33,500	205	10349764	32,000
2081030459033,48120910439094<33,500	206	10560393	32,000
20910439094<33,5002101027795834,000	207	10721166	33,000
210 10277958 34,000	208	10304590	,
· · · · · · · · · · · · · · · · · · ·	209	10439094	<33,500
211 10548289 34.000	210	10277958	34,000
	211	10548289	34,000
212 10236255 34,868	212	10236255	34,868

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2	214	10917909	<35,000
	215	10279266	35,000
3	216	10552684	35,000
4	217	10667739	35,000
5	218	10936530	35,000
	219	10554360	35,000
6	220	11153298	35,000
7	221	10552092	<36,000
0	222	10436597	36,000
8			

8			
9		Out-of-Warranty	
10		NHTSA ID No.	Mileage
11	223	10390092	36,000
	224	11120666	36,000
12	225	10266509	37,000
13	226	10445440	37,000
14	227	10266161	37,000
	228	11022555	37,000
15	229	11047327	<38,000
16	230	10323451	38,000
17	231	11058217	38,000
	232	10230394	39,000
18	233	10278647	39,000
19	234	10587168	39,000
20	235	11171001	39,000
20	236	10362825	39,600
21	237	10354071	<40,000
22	238	10838113	<40,000
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23	240	10438947	40,000
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26	244	10417674	40,000
27	245	10336687	40,000
28	246	10339629	40,000
28	247	10350306	40,000
	1		

248 $10014913$ $40,000$ $249$ $10486566$ $40,000$ $250$ $10705798$ $40,000$ $251$ $10476564$ $40,000$ $252$ $10672741$ $40,000$ $253$ $10693753$ $40,000$ $254$ $11088632$ $40,000$ $255$ $10542733$ $<41,000$ $256$ $11141233$ $41,000$ $257$ $10259400$ $<42,000$ $258$ $10232498$ $42,000$ $259$ $10272981$ $42,000$ $260$ $10562948$ $42,000$ $261$ $10443216$ $<43,000$ $262$ $10426658$ $43,200$ $263$ $10357223$ $45,000$ $264$ $10440552$ $45,000$ $265$ $1048010$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $277$ $10439148$ $50,000$ $278$ $10287346$ $50,000$ $281$ $10265488$ $50,000$ $281$ $10265488$ $50,000$ $281$ $10255510$ $50,200$	248	10614915	40,000
250 $10705798$ $40,000$ $251$ $10476564$ $40,000$ $252$ $10672741$ $40,000$ $253$ $10693753$ $40,000$ $254$ $11088632$ $40,000$ $255$ $10542733$ $<41,000$ $256$ $11141233$ $41,000$ $257$ $10259400$ $<42,000$ $258$ $10232498$ $42,000$ $259$ $10272981$ $42,000$ $260$ $10562948$ $42,000$ $261$ $10443216$ $<43,000$ $262$ $10426658$ $43,200$ $263$ $10357223$ $45,000$ $264$ $10440552$ $45,000$ $265$ $10488010$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $1053219$ $<48,000$ $273$ $1102396$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $1026398$ $50,000$ $277$ $10439148$ $50,000$ $278$ $10287346$ $50,000$ $281$ $10265488$ $50,000$ $281$ $10265488$ $50,000$ $284$ $11123269$ $50,000$			
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252 $10672741$ $40,000$ $253$ $10693753$ $40,000$ $254$ $11088632$ $40,000$ $255$ $10542733$ $<41,000$ $256$ $11141233$ $41,000$ $257$ $10259400$ $<42,000$ $258$ $10232498$ $42,000$ $259$ $10272981$ $42,000$ $260$ $10562948$ $42,000$ $261$ $10443216$ $<43,000$ $262$ $10426658$ $43,200$ $263$ $10357223$ $45,000$ $264$ $10440552$ $45,000$ $265$ $10488010$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $277$ $10439148$ $50,000$ $278$ $10287346$ $50,000$ $279$ $10560282$ $50,000$ $281$ $10265488$ $50,000$ $281$ $10265488$ $50,000$ $284$ $11123269$ $50,000$			
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256 $11141233$ $41,000$ $257$ $10259400$ $<42,000$ $258$ $10232498$ $42,000$ $259$ $10272981$ $42,000$ $260$ $10562948$ $42,000$ $261$ $10443216$ $<43,000$ $262$ $10426658$ $43,200$ $263$ $10357223$ $45,000$ $264$ $10440552$ $45,000$ $265$ $10488010$ $45,000$ $266$ $10493002$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $277$ $10439148$ $50,000$ $278$ $10287346$ $50,000$ $280$ $10577858$ $50,000$ $281$ $10265488$ $50,000$ $281$ $10265488$ $50,000$ $284$ $11123269$ $50,000$			,
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260 $10562948$ $42,000$ $261$ $10443216$ $<43,000$ $262$ $10426658$ $43,200$ $263$ $10357223$ $45,000$ $264$ $10440552$ $45,000$ $265$ $10488010$ $45,000$ $266$ $10493002$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $269$ $11099958$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $273$ $11020396$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $277$ $10439148$ $50,000$ $279$ $10560282$ $50,000$ $280$ $10577858$ $50,000$ $281$ $10265488$ $50,000$ $283$ $10779305$ $50,000$ $284$ $11123269$ $50,000$			
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262 $10426658$ $43,200$ $263$ $10357223$ $45,000$ $264$ $10440552$ $45,000$ $265$ $10488010$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $269$ $11099958$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $273$ $11020396$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $277$ $10439148$ $50,000$ $278$ $10287346$ $50,000$ $279$ $10560282$ $50,000$ $280$ $10577858$ $50,000$ $281$ $10265488$ $50,000$ $283$ $10779305$ $50,000$ $284$ $11123269$ $50,000$	260	10562948	42,000
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264 $10440552$ $45,000$ $265$ $10488010$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $269$ $11099958$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $273$ $11020396$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $277$ $10439148$ $50,000$ $279$ $10560282$ $50,000$ $280$ $10577858$ $50,000$ $281$ $10265488$ $50,000$ $283$ $10779305$ $50,000$ $284$ $11123269$ $50,000$	262	10426658	43,200
265 $10488010$ $45,000$ $266$ $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $269$ $11099958$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $273$ $11020396$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $277$ $10439148$ $50,000$ $279$ $10560282$ $50,000$ $280$ $10577858$ $50,000$ $281$ $10265488$ $50,000$ $283$ $10779305$ $50,000$ $284$ $11123269$ $50,000$	263	10357223	45,000
266 $10493002$ $45,000$ $267$ $10776467$ $45,000$ $268$ $10606408$ $45,000$ $269$ $11099958$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $273$ $11020396$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $278$ $10287346$ $50,000$ $279$ $10560282$ $50,000$ $280$ $10577858$ $50,000$ $281$ $10265488$ $50,000$ $283$ $10779305$ $50,000$ $284$ $11123269$ $50,000$	264	10440552	45,000
267 $10776467$ $45,000$ $268$ $10606408$ $45,000$ $269$ $11099958$ $45,000$ $270$ $10497898$ $46,000$ $271$ $10438969$ $47,000$ $272$ $10503219$ $<48,000$ $273$ $11020396$ $<48,000$ $274$ $10252099$ $49,000$ $275$ $11014891$ $<50,000$ $276$ $10266398$ $50,000$ $277$ $10439148$ $50,000$ $279$ $10560282$ $50,000$ $280$ $10577858$ $50,000$ $281$ $10265488$ $50,000$ $283$ $10779305$ $50,000$ $284$ $11123269$ $50,000$	265	10488010	45,000
2681060640845,0002691109995845,0002701049789846,0002711043896947,00027210503219<48,000	266	10493002	45,000
2691109995845,0002701049789846,0002711043896947,00027210503219<48,000	267	10776467	45,000
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27210503219<48,00027311020396<48,000	270	10497898	46,000
27311020396<48,000	271	10438969	47,000
2741025209949,00027511014891<50,000	272	10503219	<48,000
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2771043914850,0002781028734650,0002791056028250,0002801057785850,0002811026548850,0002821063717450,0002831077930550,0002841112326950,000	275	11014891	<50,000
2781028734650,0002791056028250,0002801057785850,0002811026548850,0002821063717450,0002831077930550,0002841112326950,000	276	10266398	50,000
2791056028250,0002801057785850,0002811026548850,0002821063717450,0002831077930550,0002841112326950,000	277	10439148	50,000
2801057785850,0002811026548850,0002821063717450,0002831077930550,0002841112326950,000	278	10287346	50,000
2811026548850,0002821063717450,0002831077930550,0002841112326950,000	279	10560282	50,000
2821063717450,0002831077930550,0002841112326950,000	280	10577858	50,000
2831077930550,0002841112326950,000	281	10265488	50,000
284 11123269 50,000	282	10637174	50,000
	283	10779305	50,000
285 10955510 50,200	284	11123269	
	285	10955510	50,200

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1	286	10243184	51,000
2	287	11128675	51,000
	288	11129632	51,000
3	289	10435978	52,500
4	290	11010308	53,000
5	291	10439799	53,500
	292	10267644	<54,000
6	293	10503173	55,000
7	294	10536189	55,000
0	295	10324392	56,000
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9	297	10269858	>56,000
10	298	10377213	58,000
	299	10456617	58,000
11	300	11150119	58,000
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328         10241882         70,000           329         10504817         70,000           330         10512156         70,000           331         10873154         70,000           332         10908140         70,020           333         10593575         73,000           334         10557407         73,500           335         10286250         75,000           336         10510586         75,000           337         10496839         75,000           338         10499241         75,000           339         10658992         77,600           340         10265501         78,000           341         10379945         80,000           342         10894286         80,000           343         10662383         80,000           344         10854998         80,000           345         11153140         80,000           346         11101683         80,000           347         10384029         82,000           350         11171598         85,000           351         10759761         86,000           352         11170135	326	10408904	69,000
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330 $10512156$ $70,000$ $331$ $10873154$ $70,000$ $332$ $10908140$ $70,020$ $333$ $10593575$ $73,000$ $334$ $10557407$ $73,500$ $335$ $10286250$ $75,000$ $336$ $10510586$ $75,000$ $337$ $10496839$ $75,000$ $338$ $10499241$ $75,000$ $339$ $10658992$ $77,600$ $340$ $10265501$ $78,000$ $341$ $10379945$ $80,000$ $342$ $10894286$ $80,000$ $343$ $10662383$ $80,000$ $344$ $10854998$ $80,000$ $345$ $11153140$ $80,000$ $346$ $11101683$ $80,000$ $347$ $10384029$ $82,000$ $348$ $10876957$ $82,000$ $350$ $11171598$ $85,000$ $351$ $10759761$ $86,800$ $352$ $11160482$ $89,000$ $353$ $10363770$ $86,800$ $354$ $10504810$ $<87,000$ $355$ $1140682$ $89,000$ $356$ $10439726$ $90,000$ $357$ $10359557$ $90,000$ $359$ $10714699$ $90,000$ $360$ $10930091$ $90,000$	328	10241882	70,000
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332 $10908140$ $70,020$ $333$ $10593575$ $73,000$ $334$ $10557407$ $73,500$ $335$ $10286250$ $75,000$ $336$ $10510586$ $75,000$ $337$ $10496839$ $75,000$ $338$ $10499241$ $75,000$ $339$ $10658992$ $77,600$ $340$ $10265501$ $78,000$ $341$ $10379945$ $80,000$ $342$ $10894286$ $80,000$ $343$ $10662383$ $80,000$ $344$ $10854998$ $80,000$ $345$ $11153140$ $80,000$ $346$ $11101683$ $80,000$ $347$ $10384029$ $82,000$ $348$ $10876957$ $82,000$ $350$ $11171598$ $85,000$ $351$ $10759761$ $86,000$ $352$ $11170135$ $86,000$ $353$ $10363770$ $86,800$ $354$ $10504810$ $<87,000$ $355$ $1140682$ $89,000$ $356$ $10439726$ $90,000$ $359$ $10714699$ $90,000$ $360$ $10930091$ $90,000$	330	10512156	70,000
333         10593575         73,000           334         10557407         73,500           335         10286250         75,000           336         10510586         75,000           337         10496839         75,000           338         10499241         75,000           339         10658992         77,600           340         10265501         78,000           341         10379945         80,000           342         10894286         80,000           343         10662383         80,000           344         10854998         80,000           345         11153140         80,000           344         10876957         82,000           348         10876957         82,000           349         10307928         85,000           350         11171598         85,000           351         10759761         86,000           352         11170135         86,000           353         10363770         86,800           354         10504810         <87,000	331	10873154	70,000
334 $10557407$ $73,500$ $335$ $10286250$ $75,000$ $336$ $10510586$ $75,000$ $337$ $10496839$ $75,000$ $337$ $10496839$ $75,000$ $338$ $10499241$ $75,000$ $339$ $10658992$ $77,600$ $340$ $10265501$ $78,000$ $341$ $10379945$ $80,000$ $342$ $10894286$ $80,000$ $343$ $10662383$ $80,000$ $344$ $10854998$ $80,000$ $345$ $11153140$ $80,000$ $346$ $11101683$ $80,000$ $347$ $10384029$ $82,000$ $348$ $10876957$ $82,000$ $350$ $11171598$ $85,000$ $351$ $10759761$ $86,000$ $352$ $11170135$ $86,000$ $353$ $10363770$ $86,800$ $354$ $10504810$ $< 87,000$ $355$ $11140682$ $89,000$ $356$ $10439726$ $90,000$ $358$ $10928968$ $90,000$ $359$ $10714699$ $90,000$	332	10908140	70,020
335 $10286250$ $75,000$ $336$ $10510586$ $75,000$ $337$ $10496839$ $75,000$ $338$ $10499241$ $75,000$ $339$ $10658992$ $77,600$ $340$ $10265501$ $78,000$ $341$ $10379945$ $80,000$ $342$ $10894286$ $80,000$ $343$ $10662383$ $80,000$ $344$ $10854998$ $80,000$ $345$ $11153140$ $80,000$ $346$ $11101683$ $80,000$ $347$ $10384029$ $82,000$ $348$ $10876957$ $82,000$ $349$ $10307928$ $85,000$ $350$ $11171598$ $85,000$ $351$ $10759761$ $86,800$ $352$ $11170135$ $86,000$ $354$ $10504810$ $<87,000$ $355$ $1140682$ $89,000$ $356$ $10439726$ $90,000$ $358$ $10928968$ $90,000$ $359$ $10714699$ $90,000$	333	10593575	73,000
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396 11003164 225,000	394	11071768	190,000
	395	10929658	200,000
397 10500801 294,000	396	11003164	225,000
	397	10500801	294,000

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65. In many instances, consumers have incurred and will continue to incur expenses for the diagnosis and attempts to correct the Defect (despite such defect having been contained in the Class Vehicles when manufactured by Defendant), repair and replacement of various components of the front suspension.

66. Again, the NHTSA Complaint database provides numerous examples of economic cost to Class Members of trying to address the Death Wobble Defect, often being charged thousands of dollars for repairs that do not remedy the Defect.

2.

**NHTSA Consumer Complaints of Referencing Costs of Repairs** 

3. NHTSA Consumer Complaints Establishing that Repairs Were Ineffective in Addressing the Death Wobble Defect

68. The following complaints from the NHTSA database expressly reference the recurrence or persistence of the Death Wobble Defect after repairs were attempted by authorized Ford dealers, often at the expense of the customer.

# January 7, 2019 NHTSA ID NUMBER: 11164915

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1 2 3 4 5 6 7 8 9 10 11 12 13	Components: STEERING NHTSA ID Number: 11164915 Incident Date December 8, 2018 Consumer Location LA PORTE, TX Vehicle Identification Number 1FT7W2BT1KE**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2019 FORD F-250. WHILE DRIVING 70 MPH, THE STEERING WHEEL SHOOK VIOLENTLY WITHOUT WARNING. THE CONTACT WOULD HAVE TO RELEASE THE ACCELERATOR PEDAL IN ORDER FOR THE STEERING WHEEL TO STOP SHAKING. THE VEHICLE WAS TAKEN TO COOK FORD (2600 PALMER HWY, TEXAS CITY, TX 77590, (409)-948-2541) WHERE IT WAS DIAGNOSED THAT THE VEHICLE BUMP STEERED, WHICH OCCURRED AT HIGH SPEEDS OVER A BUMP. <u>THE VEHICLE WAS</u> <b>REPAIRED, BUT THE FAILURE RECURRED. THE MANUFACTURER WAS MADE WARE</b> OF THE FAILURE AND OFFERED THE CONTACT AN EXTENDED WARRANTY FOR SEVEN YEARS. THE FAILURE MILEAGE WAS 100,697. 1 Affected Product
14 15	December 26, 2018 NHTSA ID NUMBER: 11163498 Components: STEERING, SUSPENSION NUTSA ID Number: 11162408
16	NHTSA ID Number: 11163498 Incident Date November 18, 2018 Consumer Location WESTON, CO
17 18	Vehicle Identification Number 1FT7W2BT3HE**** Summary of Complaint
19	CRASHNo FIRENo
20	INJURIES0 DEATHS0
21	TL* THE CONTACT OWNS A 2017 FORD F-250. WHILE DRIVING 70 MPH OVER A BUMP IN THE ROAD, THE STEERING WHEEL AND FRONT END OF THE VEHICLE STARTED TO
22 23	EXPERIENCE MILD SHAKING. IN ORDER TO STOP THE VEHICLE FROM SHAKING, THE CONTACT HAD TO DECREASE THE SPEED FROM 70 TO 30 MPH. THE CONTACT STATED
23 24	THAT THE SAME FAILURE OCCURRED MULTIPLE TIMES WHENEVER THE SPEED EXCEEDED 60-75 MPH. THE VEHICLE WAS TAKEN TO PHIL LONG FORD (301 S 2ND ST,
25	RATON, NM 87740) AND UNKNOWN REPAIRS WERE PERFORMED. <u>A MONTH AFTER</u>
26 27	<b>TAKING THE VEHICLE TO THE DEALER, THE FAILURE RECURRED.</b> THE MANUFACTURER WAS NOT CONTACTED. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE FAILURE MILEAGE WAS 17,000. <b>1 Affected Product</b>
28	
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	Case No.

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1	August 28, 2018 NHTSA ID NUMBER: 11122943 Components: STEERING, SUSPENSION
2	NHTSA ID Number: 11122943
3	Incident Date August 17, 2018 Consumer Location CHATHAM, IL
4	Vehicle Identification Number 1FT7X2B62HE****
5	Summary of Complaint CRASHNo
6	FIRENO
Ũ	INJURIES0
7	DEATHS0 TL* THE CONTACT OWNS A 2017 FORD F-250. WHILE DRIVING 69 MPH OVER A BUMP IN
8	THE ROAD, THE VEHICLE EXHIBITED THE "DEATH WOBBLE" FROM THE FRONT
9	SUSPENSION. THE CONTACT WAS UNABLE TO REGAIN CONTROL UNTIL THE SPEED WAS UNDER 40 MPH. THE CONTACT STATED THAT THE PREVIOUS OWNER HAD THE
10	VEHICLE REPAIRED AT LANDMARK FORD TRUCKS, INC (3401 E CLEAR LAKE AVE,
11	SPRINGFIELD, IL 62702, (217) 528-0770); HOWEVER, THE FAILURE RECURRED. THE CONTACT TOOK THE VEHICLE BACK TO LANDMARK FORD TRUCKS, INC, BUT THE
12	MECHANIC WAS UNABLE TO PROPERLY DIAGNOSE THE VEHICLE. THE VEHICLE
13	WAS NOT REPAIRED. <u>THE MANUFACTURER WAS CONTACTED AND PROVIDED CASE</u> NUMBER: CAS-15627787. THE APPROXIMATE FAILURE MILEAGE WAS 10,100. *DT
14	UPDATED 10/2/18*JB
	1 Affected Product
15	
16	March 19, 2018 NHTSA ID NUMBER: 11080144
17	Components: STEERING, SUSPENSION NHTSA ID Number: 11080144
18	Incident Date March 6, 2018
19	Consumer Location WASHINGTON, IA Vehicle Identification Number 1FT7W2BT7HE****
20	Summary of Complaint
21	CRASHNo
	FIRENo INJURIES0
22	DEATHSO
23	TL* THE CONTACT OWNS A 2017 FORD F-250 SD. WHILE DRIVING 70 MPH, THE FRONT END OF THE VEHICLE EXPERIENCED A "DEATH WOBBLE". THE FAILURE IMPACTED THE
24	STEERING AND CAUSED THE STEERING WHEEL TO VIBRATE VIOLENTLY. THERE WERE
25	NO WARNING INDICATORS ILLUMINATED. MCGRATH FORD (4001 1ST AVE SE, CEDAR RAPIDS, IA 52402) DIAGNOSED THAT THE CONTROL ARM FAILED. <b>THE VEHICLE WAS</b>
26	REPAIRED, BUT THE FAILURE RECURRED AFTER THE REPAIR. THE
27	MANUFACTURER WAS NOTIFIED AND FILED CASE NUMBER: 14400173. THE FAILURE MILEAGE WAS 19,500. THE VIN WAS NOT AVAILABLE. *TT
28	1 Affected Product
-	1 Associated Document
	-315- Class Action Complaint
	Case No.

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1	
2	August 29, 2018 NHTSA ID NUMBER: 11123269 Components: STRUCTURE, STEERING, SUSPENSION
3	NHTSA ID Number: 11123269
4	Incident Date June 1, 2016
5	Consumer Location DAMASCUS, MD
	Vehicle Identification Number 1FT7X3B66EE****
6	Summary of Complaint CRASHNo
7	FIRENo
8	INJURIES0
0	DEATHS0
9	TL* THE CONTACT OWNS A 2014 FORD F-350. WHILE DRIVING 25 MPH, THE FRONT END
10	OF THE VEHICLE SHIMMIED. THE VEHICLE HAD TO BE RESTARTED TO GAIN CONTROL. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO
11	SHEEHY PERFORMANCE CENTER (600 N FREDERICK AVE, GAITHERSBURG, MD 20877,
12	(301) 548-9132) WHERE IT WAS DIAGNOSED THAT THE BALL JOINTS, TIE ROD, SHOCKS, AND THE TIRES NEEDED TO BE REPLACED. <b>THE VEHICLE WAS REPAIRED, BUT THE</b>
	FAILURE RECURRED. THE MANUFACTURER WAS CONTACTED AND PROVIDED
13	CASE NUMBER: 12943941. THE FAILURE MILEAGE WAS 50,000.
14	1 Affected Product
15	
16	July 24, 2017 NHTSA ID NUMBER: 11010308
	Components: SUSPENSION
17	NHTSA ID Number: 11010308 Incident Date February 15, 2015
18	Consumer Location COLORADO SPRINGS, CO
19	Vehicle Identification Number 1FT8W3BT0DE****
	Summary of Complaint
20	CRASHNo
21	FIRENo INJURIES0
	DEATHSO
22	TL* THE CONTACT OWNS A 2013 FORD F-350. ON SEVERAL OCCASIONS, WHILE DRIVING
23	55 MPH, THE VEHICLE VIOLENTLY SHOOK WHEN MAKING CONTACT WITH A BUMP. THE
24	CONTACT STATED THAT THE STEERING WHEEL BECAME DIFFICULT TO MANEUVER
	WHEN THE SHAKING OCCURRED AND THE CHECK ENGINE WARNING INDICATOR
25	ILLUMINATED. THE VEHICLE WAS TAKEN TO PHIL LONG FORD OF MOTOR CITY (1212 MOTOR CITY DR, COLORADO SPRINGS, CO 80905 (719) 694-3487) WHERE THE FAILURE
26	WAS DIAGNOSED AS THE (DEATH WOBBLE). THE BALL JOINTS, TRACKING BAR
	BUSHINGS, SPRING MOUTH, STEERING STABILIZER SHOCK, AND ALL FOUR TIRES
27	NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE
28	<b>RECURRED. THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO</b>
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.317 Page 317 of 353
1	TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS
2	<b>OFFERED.</b> THE FAILURE MILEAGE WAS 53,000. <b>1 Affected Product</b>
3	
4	April 18, 2018 NHTSA ID NUMBER: 11088792
5	Components: SUSPENSION, WHEELS NHTSA ID Number: 11088792
6	Incident Date April 18, 2018
7	Consumer Location GREENVIEW, IL Vehicle Identification Number 1FT7W2BT7DE****
8	Summary of Complaint CRASHNo
9	FIRENo INJURIESO
10	DEATHS0
11	TL* THE CONTACT OWNS A 2013 FORD F-250. WHILE DRIVING ABOVE 40 MPH OVER A BUMP IN THE ROAD, THE VEHICLE SHOOK AND THE FRONT OF THE VEHICLE BECAME
12	DIFFICULT TO CONTROL. THERE WERE NO WARNING INDICATORS ILLUMINATED
13	BEFORE OR AFTER THE FAILURE. THE VEHICLE WAS TAKEN TO LANDMARK FORD (2401 PRAIRIE CROSSING DR., SPRINGFIELD, IL 62711) FOR DIAGNOSTIC TESTING AND
14	REPAIRS. THE CONTACT WAS UNABLE TO RECALL WHAT WAS DIAGNOSED AND REPAIRED. THE CONTACT STATED THAT THE VEHICLE WAS REPAIRED, BUT THE
15	FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE
16	APPROXIMATE FAILURE MILEAGE WAS 60,000. 1 Affected Product
17	
18	July 26, 2016 NHTSA ID NUMBER: 10888734
19	Components: SUSPENSION, SERVICE BRAKES, HYDRAULIC NHTSA ID Number: 10888734
20	Incident Date November 20, 2015
21	Consumer Location MANVEL, TX Vehicle Identification Number 1FT7W2BT3DE****
22	Summary of Complaint CRASHNo
23	FIRENo
24	INJURIES0 DEATHS0
25	TL* THE CONTACT OWNS A 2013 FORD F-250. WHILE DRIVING APPROXIMATELY 60 MPH, THE VEHICLE'S FRONT END WOBBLED UNCONTROLLABLY. THE CONTACT STATED IT
26	FELT AS IF HE WERE LOSING CONTROL OF THE VEHICLE. THE VEHICLE WAS TAKEN TO
27	THE DEALER WHERE IT WAS DIAGNOSED THAT THE WHEELS AND ROTORS WERE THE CAUSE OF THE WOBBLE AND NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED,
28	BUT THE FAILURE RECURRED. THE VEHICLE WAS TAKEN BACK TO THE DEALER WHERE IT WAS DIAGNOSED THAT THE VEHICLE LOST COMPONENTS THAT NEEDED TO
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c	ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.318 Page 318 of 353
1 2 3 4 5	BE TIGHTENED. <u>THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE</u> <u>PERSISTED. THE CONTACT STATED THAT THE VEHICLE WAS TAKEN BACK TO THE</u> <u>DEALER AGAIN, BUT THE CAUSE OF THE FAILURE COULD NOT BE DETERMINED.</u> THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 100,000 UPDATED 08/23/16 *BF 1 Affected Product 1 Associated Document
6 7	January 18, 2017 NHTSA ID NUMBER: 10946144 Components: STEERING
8 9	NHTSA ID Number: 10946144 Incident Date December 20, 2016 Consumer Location PASADENA, TX Vehicle Identification Number 1FT7W2BT8CE****
10 11	Summary of Complaint CRASHNo FIRENo
12 13	INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2012 FORD F-250. THE CONTACT STATED THAT WHILE
14 15	DRIVING AT APPROXIMATELY 45 MPH AND HIT A BUMP, THE STEERING WHEEL SHOOK. AS A RESULT, THE CONTACT REDUCED THE VEHICLE IN SPEED IN ORDER TO AVOID A CRASH. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO
16 17 18	<b>REPLACED THE TRACK BAR HOWEVER, THE FAILURE RECURRED.</b> THE FAILURE WAS NOT REMEDIED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 117,500. <b>1 Affected Product</b>
19 20	January 26, 2016 NHTSA ID NUMBER: 10822406 Components: SUSPENSION, STEERING
21 22	NHTSA ID Number: 10822406 Incident Date June 25, 2012 Consumer Location HELLAM, PA
23	Vehicle Identification Number 1FT7W2BT6CE**** Summary of Complaint CRASHNo
24 25	FIRENo INJURIES0
26 27	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2012 FORD F-250. WHILE DRIVING 40 MPH, THE FRONT END OF THE VEHICLE SHOOK AND BECAME DIFFICULT TO CONTROL. <u>THE FAILURE</u>
27 28	OCCURRED CONSTANTLY. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS DIAGNOSED THAT THE DRAG LINK AND THE BALL JOINTS NEEDED TO BE REPLACED. THE VEHICLE ALSO NEEDED A FRONT END ALIGNMENT. THE REPAIRS
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1 2 3	WERE DONE; HOWEVER, THE FAILURE RECURRED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 3,000. 1 Affected Product	
4		
5	February 28, 2013 NHTSA ID NUMBER: 10500801 Components: STEERING	
6	NHTSA ID Number: 10500801 Incident Date January 2, 2013	
0	Consumer Location POCOMOKE CITY, MD	
7	Vehicle Identification Number 1FT8W3BTXBE****	
8	Summary of Complaint CRASHNo	
9	FIRENO	
10	INJURIES0	
-	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2011 FORD F-350 SUPER DUTY. THE CONTACT STATED THAT	
11	WHILE DRIVING 59 MPH, THE VEHICLE BEGAN TO SHAKE AND WOBBLE VIOLENTLY,	
12	CAUSING THE CONTACT DIFFICULTY IN CONTROLLING THE VEHICLE. THE VEHICLE	
13	WAS TAKEN TO A DEALER FOR DIAGNOSIS WHERE THE U-BOLTS WERE REPLACED BUT THE FAILURE RECURRED. THE VEHICLE WAS THEN TAKEN TO AN	
14	INDEPENDENT MECHANIC WHERE THE STEERING SHOCK ABSORBER WAS	
	<b>REPLACED HOWEVER, THE FAILURE RECURRED. THE TORQUE BAR AND THE TWO</b>	
15	FRONT SHOCKS WERE REPLACED ON SUBSEQUENT VISITS. LATER, THE TIRES	
	WERE ROTATED BUT TO NO AVAIL. THE MECHANIC THEN DEFLATED THE TIRES.	
16	THE FAILURE RECURRED. THE TIRES WERE THEN OVER INFLATED AND THE	
16 17	THE FAILURE RECURRED. THE TIRES WERE THEN OVER INFLATED AND THE FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE	
17	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE. THE VEHICLE WAS	
17 18	<b>FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE</b> <b>WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.</b> THE VEHICLE WAS NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT	
17	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE. THE VEHICLE WAS	
17 18	<b>FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE</b> <b>WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.</b> THE VEHICLE WAS NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT MILEAGE WAS 315,000.	
17 18 19	<b>FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE</b> <b>WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.</b> THE VEHICLE WAS NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT MILEAGE WAS 315,000.	
17 18 19 20	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         THE VEHICLE WAS         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         THE VEHICLE WAS         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID Number: 10471247	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         THE VEHICLE WAS         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID Number: 10471247         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         THE VEHICLE WAS         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID Number: 10471247         Incident Date July 17, 2011         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****         Summary of Complaint	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID Number: 10471247         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID NUMBER: 10471247         Incident Date July 17, 2011         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****         Summary of Complaint         CRASHNO         FIRENO         INJURIES0	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE. THE VEHICLE WAS         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID Number: 10471247         Incident Date July 17, 2011         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****         Summary of Complaint         CRASHNo         FIRENo         INJURIES0         DEATHS0	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID NUMBER: 10471247         Incident Date July 17, 2011         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****         Summary of Complaint         CRASHNO         FIRENO         INJURIES0	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         NE VEHICLE WAS         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID NUMBER: 10471247         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****         Summary of Complaint         CRASHNO         FIRENO         INJURESO         DEATHSO         THE CONTACT OWNS A 2011 FORD F350 SD. THE CONTACT STATED THAT HE <td colsp<="" td=""></td>	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE         WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE.         THE VEHICLE WAS         NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT         MILEAGE WAS 315,000.         1 Affected Product         August 17, 2012 NHTSA ID NUMBER: 10471247         Components: STEERING         NHTSA ID Number: 10471247         Incident Date July 17, 2011         Consumer Location THOUSAND OAKS, CA         Vehicle Identification Number 1FDRF3GT6BE****         Summary of Complaint         CRASHNo         FIRENo         INJURIES0         DEATHS0         TL* THE CONTACT OWNS A 2011 FORD F350 SD. THE CONTACT STATED THAT HE         NOTICED BOTH FRONT TIRES EXHIBITED AN IRREGULAR WEAR PATTERN IN THE	

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1	EXACT SAME PLACE. THE VEHICLE WAS TAKEN TO THE DEALER WHO ALIGNED
2	THE TIRES BUT THE FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED AND A CLAIM WAS FILED (CLAIM NUMBER 1512842141) BUT IT WAS DENIED BY THE
3	MANUFACTURER WHO OFFERED NO ASSISTANCE. THE FAILURE MILEAGE WAS
5	2,000 AND THE CURRENT MILEAGE WAS 20,000.
4	1 Affected Product
5	
6	January 27, 2014 NHTSA ID NUMBER: 10561609
	Components: SUSPENSION, STEERING
7	NHTSA ID Number: 10561609
8	Incident Date January 27, 2012
9	Consumer Location SAN ANTONIO, TX Vehicle Identification Number 1FT8W3DT2BE****
	Summary of Complaint
10	CRASHNo
11	FIRENo
12	INJURIES0
12	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2011 FORD F-350 SD. WHILE DRIVING 55 MPH, THE CONTACT
13	STATED THAT THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE CONTACT APPLIED
14	THE BRAKES TO SLOW THE VEHICLE DOWN AND THE SHAKING SUBSIDED. THE
	VEHICLE WAS TAKEN TO THE DEALER FOR INSPECTION AND THEY WERE UNABLE TO
15	DIAGNOSE THE FAILURE. THE CONTACT STATED THE TRAC BAR, BUSHINGS, BALL
16	JOINTS, STEERING AND TIE ROD ENDS WERE ALL REPLACED. THE TIRES ON THE VEHICLE WERE REPLACED AND BALANCED BUT THE FAILURE RECURRED. THE
17	MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE
	FAILURE MILEAGE WAS 25,000. UPDATED 03/05/14*LJ THE CONSUMER STATED HE
18	EXPERIENCED STEERING WHEEL OSCILLATION FOR THE LAST 70,000 MILES. THE
19	CONSUMER HAD NUMEROUS COMPONENTS REPLACED, BUT TO NO AVAIL. THE DEALER INFROMED THE CONSUMER THE OSCILLATION WAS NORMAL.
20	1 Affected Product
21	
22	October 2, 2015 NHTSA ID NUMBER: 10779305
23	Components: WHEELS, STEERING NHTSA ID Number: 10779305
	Incident Date November 28, 2014
24	Consumer Location FAIRBANKS, IN
25	Vehicle Identification Number 1FT7W2BT1BE****
26	Summary of Complaint
	CRASHNo FIRENo
27	INJURIESO
28	DEATHS0
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C C	Case 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.321 Page 321 of 353
1 2 3 4 5 6	TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING AT APPROXIMATELY 50 MPH, THE VEHICLE VIBRATED VIOLENTLY WITHOUT WARNING. THE FAILURE RECURRED INTERMITTENTLY. <u>THE VEHICLE WAS TAKEN TO AN INDEPENDENT</u> <u>MECHANIC WHERE THE TIRE SHOCKS, VIBRATION DAMPENER, DRAG LINK, TIE</u> <u>ROD, AND ALL THE TIRES WERE REPLACED; HOWEVER, THE FAILURE RECURRED.</u> THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 50,000. 1 Affected Product
0 7 8	March 3, 2014 NHTSA ID NUMBER: 10566852 Components: STEERING
0 9	NHTSA ID Number: 10566852 Incident Date February 22, 2014
9 10	Consumer Location PUYALLUP, WA Vehicle Identification Number 1FT7X2BT1BE****
11	Summary of Complaint CRASHNo
12	FIRENo INJURIES0
13	DEATHSO
14	TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE DRIVING 60 MPH, THE VEHICLE BEGAN SHAKING ABNORMALLY. <b>THE CONTACT TOOK</b>
15	THE VEHICLE TO THE DEALER, WHO STATED THAT THEY WOULD BALANCE ALL
16	FOR TIRES AND PERFORMED AND ALIGNMENT CHECK. THE VEHICLE WAS REPAIRED HOWEVER, THE PROBLEM PERSISTED. THE MANUFACTURER WAS NOT
17	CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS 22,500. *TR
18	1 Affected Product
19	
20	February 12, 2013 NHTSA ID NUMBER: 10497898
	Components: STEERING NHTSA ID Number: 10497898
21	Incident Date February 11, 2013
22	Consumer Location WEST GROVE, PA
23	Vehicle Identification Number 1FT7X2BT0BE**** Summary of Complaint
24	CRASHNo
	FIRENO
25	INJURIES0 DEATHS0
26	TL* THE CONTACT OWNS A 2011 FORD F-250 SUPER DUTY. THE CONTACT STATED THAT
27	WHILE DRIVING 65 MPH, THE STEERING WHEEL BEGAN TO SHAKE ABNORMALLY. THE
	FAILURE PROGRESSED UNTIL THE SHAKING BECAME VIOLENT. <u>THE VEHICLE WAS</u> TAKEN AN INDEPENDENT MECHANIC WHERE THE WHEELS WERE BALANCED
28	HOWEVER, THE FAILURE RECURRED. THE CONTACT MADE ARRANGEMENTS FOR
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1 2 3	THE VEHICLE TO BE DIAGNOSED BY A DEALER. THE VEHICLE WAS NOT REPAIRED. THE FAILURE AND CURRENT MILEAGE WAS 46,000. 1 Affected Product
4	November 21, 2012 NHTSA ID NUMBER: 10485416
5	Components: STEERING
6	NHTSA ID Number: 10485416 Incident Date October 18, 2012
7	Consumer Location WASHINGTON, IL
8	Vehicle Identification Number N/A Summary of Complaint
9	CRASHNo FIRENo
	INJURIES0
10	<b>DEATHS0</b> I WAS DRIVING 65 MPH ON THE INTERSTATE AND I HIT A LINE OF BUMPS. THE TRUCK
11	WOULD START SHAKING VIOLENTLY AND I WOULD HAVE TO SLOW DOWN UNDER 30
12	MPH ON THE INTERSTATE. <u>FORD PUT A NEW STEERING DAMPER IN AND THE</u> PROBLEM PERSISTED 2 WEEKS AFTER. I WENT AND BOUGHT A KIT FROM WRC
13	MOTORSPORTS FOR \$1,000 AND PAID OVER \$500.00 TO HAVE IT PUT IN TODAY.
14	HOPEFULLY THIS STOPS THE PROBLEM AND FORD WILL REIMBURSE ME SOME OF THE COST. *TR
15	1 Affected Product
16	
17	September 24, 2012 NHTSA ID NUMBER: 10476818
18	Components: STEERING NHTSA ID Number: 10476818
19	Incident Date June 12, 2012 Consumer Location SEARCY, AR
20	Vehicle Identification Number 1FT7W2BT8BE****
21	Summary of Complaint CRASHNo
22	FIRENo
23	INJURIES0 DEATHS0
24	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE
25	TRAVELING 70 MPH, HE DROVE OVER A BUMP AND THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE CONTACT MENTIONED THAT HE HAD TO DECELERATE SINCE THE
	VEHICLE FELT AS IF IT WAS GOING TO CRASH. THE VEHICLE WAS TAKEN TO THE
26	DEALER WHO STATED THAT THE STEERING STABILIZER SHOCK NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE
27	MANUFACTURER WAS MADE AWARE OF THE FAILURE WHO DID NOT OFFER ANY
28	ASSISTANCE. THE FAILURE MILEAGE WAS 23,000. UPDATED 10/31/12*LJ UPDATED 10/31/12
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1 2	1 Affected Product 1 Associated Document
3	August 28, 2012 NHTSA ID NUMBER: 10472738
4	Components: STEERING NHTSA ID Number: 10472738
5	Incident Date August 1, 2011
6	Consumer Location HOUSTON, TX
7	Vehicle Identification Number 1FT7W2BT9BE**** Summary of Complaint
8	CRASHNo
	FIRENO
9	INJURIES0 DEATHS0
10	TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING 40 MPH
11	OVER A POT HOLE WHEN THE STEERING WHEEL BEGAN TO SHAKE ABNORMALLY. THE
12	<b><u>CONTACT WAITED UNTIL THE SHAKING CEASED INDEPENDENTLY HOWEVER, THE</u> FAILURE RECURRED FREQUENTLY. THE VEHICLE WAS TAKEN TO THE DEALER</b>
13	WHO ADVISED THAT THE FAILURE WAS CAUSED BY THE TIRES AND
	<b><u>RECOMMENDED HAVING A FRONT END ALIGNMENT PERFORMED. THE CONTACT</u> STATED THAT ALL FOUR TIRES WERE REPLACED AND AN ALIGNMENT WAS</b>
14	PERFORMED HOWEVER, THE FAILURE PERSISTED. THE MANUFACTURER WAS NOT
15	MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 10. THE CURRENT
16	MILEAGE WAS 31,000. 1 Affected Product
17	
18	L-L-5 2017 NUTSA ID NUMBED, 11002164
19	July 5, 2017 NHTSA ID NUMBER: 11003164 Components: SUSPENSION, WHEELS
	NHTSA ID Number: 11003164
20	Incident Date April 3, 2017 Consumer Location BAKERSFIELD, CA
21	Vehicle Identification Number 1FT7W2BT6BE****
22	Summary of Complaint
23	CRASHNo FIRENo
24	INJURIES0
	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH OVER A BUMP IN
25	THE CONTACT OWNS A 2011 FORD F-230. WHILE DRIVING 00 MPH OVER A BOMP IN THE ROADWAY, THE VEHICLE SHOOK VIOLENTLY UNTIL SLOWING TO 30 MPH OR
26	COMING TO A FULL STOP. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE
27	VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THE LOCAL DEALER (JIM BURKE FORD 2001 OAK ST, BAKERSFIELD, CA 93301 (661) 328-3600), BUT THE FAILURE
28	COULD NOT BE DUPLICATED OR DIAGNOSED. THE CONTACT WAS ADVISED TO
	<b>REPLACE ALL FOUR TIRES. ALL FOUR TIRES WERE REPLACED, BUT THE ISSUE</b>
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1	PERSISTED. THE MANUFACTURER WAS NOTIFIED AND REFERRED THE CONTACT
2	TO NHTSA. THE FAILURE MILEAGE WAS 225,000. 1 Affected Product
3	
4	June 27, 2017 NHTSA ID NUMBER: 11001691
5	Components: SUSPENSION, STEERING NHTSA ID Number: 11001691
6	Incident Date June 15, 2013
7	Consumer Location VICTORIA, TX Vehicle Identification Number 1FT7W2BT4BE****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0 DEATHS0
11	TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH, THE VEHICLE
12	WOBBLED AND SHOOK VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER (MAC HAIK FORD LINCOLN HYUNDAI 4506 N NAVARRO ST, VICTORIA, TX 77904), BUT THE
13	DEALER WAS UNABLE TO DUPLICATE THE FAILURE. THE DEALER REPLACED
14	<u>UNKNOWN PARTS ON THE FRONT END OF THE VEHICLE, BUT THE FAILURE</u> RECURRED SEVERAL MORE TIMES. THE MANUFACTURER STATED THAT THE
14	CONTACT SHOULD TAKE THE VEHICLE TO A DEALER AND HAVE IT DIAGNOSED.
	THE CONTACT WAS REFERRED TO NHTSA. THE APPROXIMATE FAILURE MILEAGE WAS 25,000.
16	1 Affected Product
17	
18	May 30, 2017 NHTSA ID NUMBER: 10992335 Components: SUSPENSION, SERVICE BRAKES, HYDRAULIC
19	NHTSA ID Number: 10992335
20	Incident Date May 20, 2017 Consumer Location BROOKEVILLE, MD
21	Vehicle Identification Number 1FT7X2B69BE****
22	Summary of Complaint CRASHNo
23	FIRENo
24	INJURIES0 DEATHS0
25	TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING OVER 60 MPH, THE
26	VEHICLE SHOOK AND THE STEERING WHEEL LOCKED. WHILE THE BRAKE PEDAL WAS DEPRESSED, THE VEHICLE SHOOK UNCONTROLLABLY. THERE WERE NO WARNING
27	INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO THE DEALER (KOONS SILVER SPRING FORD, 3111 AUTOMOBILE BLVD, SILVER SPRING, MD 20904 (301) 890-
28	6100) WHERE IT WAS DIAGNOSED THAT THE BALL JOINT, BRAKE PADS, AND
	STABILIZER BAR NEEDED TO BE REPLACED. ALSO, FLUID WAS LEAKING ON THE
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	•
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1 2	SHOCKS AND THE STRUT NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURES RECURRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURES. THE FAILURE MILEAGE WAS 58,100.
3	1 Affected Product
4	December 2, 2016 NHTSA ID NUMBER: 10929658
5 6	Components: SUSPENSION NHTSA ID Number: 10929658
7	Incident Date August 5, 2016
8	Consumer Location SOUTH HAVEN, MI Vehicle Identification Number 1FT7W2BT0BE****
9	Summary of Complaint CRASHNo
10	FIRENo INJURIES0
11	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2011 FORD F-250 SD. WHILE DRIVING VARIOUS SPEEDS
12	OVER A BUMP IN THE ROAD, THE FRONT END OF THE VEHICLE WOBBLED VERY VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER ON NUMEROUS OCCASIONS
13	FOR A DIAGNOSTIC TESTING AND REPAIR. THE CONTACT STATED THAT THE BALL JOINTS, SHOCK ABSORBERS, AND OTHER UNKNOWN COMPONENTS WERE
14 15	<b>REPLACED OR REPAIRED BY THE DEALER, BUT THE FAILURE PERSISTED.</b> THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE
16	FAILURE MILEAGE WAS 200,000.
17	1 Affected Product
18	July 2, 2014 NHTSA ID NUMBER: 10607693
19	Components: SUSPENSION, STEERING NHTSA ID Number: 10607693
20	Incident Date May 14, 2014 Consumer Location MULDROW, OK
21	Vehicle Identification Number 1FT7X2BTXBE****
22	Summary of Complaint CRASHNo
23 24	FIRENo INJURIES0
24	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE
26	DRIVING AT 60 MPH ON UNEVEN ROAD PAVEMENT, THE VEHICLE STARTED TO VIBRATE. THE CONTACT ALSO STATED THAT HE REDUCED THE SPEED TO 10 MPH, THE
27	VIBRATION STOPPED. <u>THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS</u> DIAGNOSED THAT ALL FOUR TIRES NEEDED TO BE REPLACED AND BALANCED.
28	THE TECHNICIAN ALSO ALIGNED BOTH FRONT DRIVERS AND PASSENGERS SIDE
	TIRES. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE VEHICLE -325-
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1 2 3	WAS TAKEN TO THE DEALER AGAIN BUT THE FAILURE WAS UNABLE TO BE <u>DUPLICATED.</u> THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 30,000. 1 Affected Product
4 5 6	February 8, 2013 NHTSA ID NUMBER: 10496896 Components: SUSPENSION NHTSA ID Number: 10496896
7 8 9	Incident Date July 9, 2011 Consumer Location KENNARD, NE Vehicle Identification Number N/A Summary of Complaint CRASHNo
10 11	FIRENO INJURIESO DEATHSO TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE
12 13 14 15	DRIVING 40 MPH, THE FRONT END SHIMMERED SEVERELY WHEN THE VEHICLE HIT A BUMP. <u>THE VEHICLE WAS TAKEN TO THE DEALER FOUR TIMES WHO REPLACED</u> <u>THE BALL JOINTS AND STABILIZER ARM BUT THE FAILURE RECURRED.</u> THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 30,000 AND THE CURRENT MILEAGE WAS 68,000. THE VIN WAS UNAVAILABLE. 1 Affected Product
16 17	December 5, 2012 NHTSA ID NUMBER: 10487446
17 18 19 20	Components: SUSPENSION NHTSA ID Number: 10487446 Incident Date February 1, 2012 Consumer Location MOUNTVILLE, PA Vehicle Identification Number 1FT7X2B64BE****
21 22	Summary of Complaint CRASHNo FIRENo
23	INJURIES0 DEATHS0 TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING
24 25	APPROXIMATELY 50 MPH OVER A ROAD BUMP WHEN THE FRONT END OF THE VEHICLE BEGAN TO SHAKE VIOLENTLY. <u>THE VEHICLE WAS TAKEN TO AN AUTHORIZED</u> <u>DEALER THREE TIMES FOR THE FAILURE. THE STEERING STABILIZER AND FRONT</u>
26 27 28	END SHOCKS WERE REPLACED AT DIFFERENT TIMES. THE FAILURE RECURRED AFTER THE REPAIRS WERE PERFORMED WHENEVER DRIVING OVER A ROAD BUMP OR POTHOLE. THE MANUFACTURER WAS NOTIFIED OF THE PROBLEM. THE APPROXIMATE FAILURE MILEAGE WAS 28,848.
28	1 Affected Product -326-
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1	
2	January 4, 2013 NHTSA ID NUMBER: 10491015 Components: SUSPENSION
3	NHTSA ID Number: 10491015
4	Incident Date September 5, 2012
5	Consumer Location YUKON, OK
5	Vehicle Identification Number 1FTSW2BR3AE****
6	Summary of Complaint
7	CRASHNo
-	FIRENo INJURIES0
8	DEATHSO
9	TL* THE CONTACT OWNS A 2010 FORD F-250 DIESEL. THE CONTACT STATED THAT
	WHILE DRIVING 30 MPH, THE VEHICLE WOULD START SHAKING VIOLENTLY. THE
0	VEHICLE WAS TAKEN TO THE DEALER HOWEVER, THE TECHNICIAN WAS UNABLE
1	TO DIAGNOSE THE FAILURE. AS A PRECAUTION, THE DEALER REPLACED THE
2	DUAL SHOCKS AND TIRES. THE MANUFACTURER WAS NOT MADE AWARE OF THE
2	<b>FAILURE. THE FAILURE PERSISTED.</b> THE FAILURE MILEAGE WAS 30,000 AND THE CURRENT MILEAGE WAS 46,000.
3	1 Affected Product
4	
4	
5	February 8, 2013 NHTSA ID NUMBER: 10496839
6	Components: SUSPENSION
	NHTSA ID Number: 10496839
7	Incident Date September 12, 2012
8	Consumer Location RIVERTON, UT Vehicle Identification Number 1FTWW31R99E****
	Summary of Complaint
9	CRASHNo
0	FIRENO
1	INJURIES0
1	DEATHS0
2	TL* THE CONTACT OWNS A 2009 FORD F-350 SD. THE CONTACT STATED THAT WHILE
2	DRIVING 65 MPH, HE DROVE OVER A BUMP IN THE ROAD AND THE FRONT DRIVER SIDE
3	TIRE WOBBLED VIOLENTLY. THE SHAKING DID NOT STOP UNTIL THE VEHICLE SLOWEI TO 35 MPH. THE VEHICLE WAS TAKEN TO TWO DIFFERENT DEALERS WHERE IT
4	WAS CONFIRMED THAT THE FRONT HUB HAD SEIZED AND NEEDED TO BE
5	REPLACED ALONG WITH THE GEAR BOX. THE TIRES, SHOCKS, AND DUAL
5	STABILIZERS WERE ALL REPLACED BUT THE FAILURE RECURRED SO THE DEALER
6	ADJUSTED THE STEERING GEAR BOX. THE CONTACT STATED THAT THE FAILURE
7	WAS NOT REMEDIED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS
'	75,000 AND THE CURRENT MILEAGE WAS 99,000.
8	1 Affected Product
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1	
2	December 6, 2012 NHTSA ID NUMBER: 10487529
	Components: STEERING NHTSA ID Number: 10487529
3	Incident Date July 15, 2009
4	Consumer Location LONSDALE, AR
5	Vehicle Identification Number 1FTSW21R19E**** Summary of Complaint
6	CRASHNo
7	FIRENO
	INJURIES0 DEATHS0
8	TL* THE CONTACT OWNS A 2009 FORD F-250 SD. WHILE DRIVING APPROXIMATELY 50
9	MPH, THE CONTACT NOTICED A VIBRATION FROM THE FRONT END OF THE VEHICLE. THE FAILURE PROGRESSED UNTIL THE FRONT END WOULD SHAKE VIOLENTLY. <b>THE</b>
10	VEHICLE WAS TAKEN TO TWO DIFFERENT MECHANICS FOR DIAGNOSTIC TESTING.
11	THE MECHANICS WERE UNABLE TO DIAGNOSE THE FAILURE. THE CONTACT
12	STATED THAT THE FRONT DRIVER AND PASSENGER SIDE TIRES WERE REPLACED TWICE IN AN ATTEMPT TO CORRECT THE FAILURE HOWEVER, THE FAILURE
	PERSISTED. THE VEHICLE WAS NOT REPAIRED. THE APPROXIMATE FAILURE
13	MILEAGE WAS 10,000.
14	1 Affected Product
15	
16	March 17, 2009 NHTSA ID NUMBER: 10262107
17	Components: STEERING NHTSA ID Number: 10262107
	Incident Date June 10, 2008
18	Consumer Location Unknown
19	Vehicle Identification Number 1FDWW35R08E****
20	Summary of Complaint CRASHNo
20	FIRENo
21	INJURIES0
22	DEATHSO
23	TL*THE CONTACT OWNS A 2008 FORD F-350 SD. THE CONTACT STATED THAT THE FRONT END OF THE VEHICLE WOULD SHIMMY AND SHAKE WHILE DRIVING
	APPROXIMATELY 50 MPH. ON ONE OCCASION, THE STEERING WHEEL SHOOK SO
24	SEVERELY THAT HE LOST CONTROL OF THE VEHICLE AND VEERED OFF THE ROAD.
25	THERE WERE NO INJURIES. <u>THE CONTACT TOOK THE VEHICLE TO THE DEALER FOR</u> REPAIRS, BUT THE FAILURE PERSISTED. HE FILED A COMPLAINT WITH THE
26	MANUFACTURER, BUT HAS YET TO RECEIVE ANY FEEDBACK. THE CURRENT
27	MILEAGE WAS APPROXIMATELY 42,600 AND FAILURE MILEAGE WAS
	APPROXIMATELY 15,000. 1 Affected Product
28	
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1	February 2, 2015 NHTSA ID NUMBER: 10680495
2	Components: SUSPENSION
	NHTSA ID Number: 10680495 Incident Date January 15, 2015
3	Consumer Location BOYDS, MD
4	Vehicle Identification Number 1FTWX31R88E**** Summary of Complaint
5	CRASHNo
6	FIRENO
7	INJURIES0 DEATHS0
8	TL* THE CONTACT OWNS A 2008 FORD F-350. WHILE DRIVING 65 MPH OVER A POTHOLE,
9	THE VEHICLE BEGAN TO VIBRATE VIOLENTLY. THE FAILURE RECURRED ON SEVERAL OCCASIONS. THE VEHICLE WAS TAKEN TO A DEALER, WHERE THE TRACK BAR
-	BALL JOINT WAS REPLACED. THE FAILURE PERSISTED. THE MANUFACTURER WAS
10	NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 22,000. UPDATED 03/24/15*LJ UPDATED 9/20/2017*CN
11	1 Affected Product
12	1 Associated Document
13	
14	February 6, 2018 NHTSA ID NUMBER: 11067314 Components: STEERING, SUSPENSION
15	NHTSA ID Number: 11067314
16	Incident Date February 6, 2018
17	Consumer Location NORFOLK, VA Vehicle Identification Number 1FTSW21R28E****
	Summary of Complaint
18	CRASHNo FIRENo
19	INJURIES0
20	<b>DEATHS0</b> SINCE OWNING MY F250, IT HAS RANDOMLY EXPERIENCED A SEVERE VIBRATION
21	"DEATH WOBBLE" AFTER HITTING BUMPS AT HIGHWAY SPEED. <u>SO BAD, THAT I</u>
22	INSTALLED A STEERING STABILIZER TO HELP MITIGATE THE ISSUE (FORD DIDN'T SEEM TO HAVE A BETTER FIX). I ALWAYS KEEP MY LOAD ''E ''RATED TIRES
23	INFLATED PER RECOMMENDED PRESSURES YET THE PROBLEM PERSISTED. ON
24	SEVERAL OCCASIONS I THOUGHT THAT I WAS GOING TO LOSE CONTROL OF THE
25	VEHICLE WHEN THE VIBRATIONS HAPPENED. FORD HAS YET TO ADDRESS THIS ISSUE OTHER THAN TO SAY SLOW DOWN WHEN THE SEVERE VIBRATION OCCURS. FOR
	NEARLY 10 YEARS THIS HAS BEEN AN ACCIDENT WAITING TO HAPPEN FOR MANY F250
26	OWNERS AND FORD'S ANSWER IS WHEN IT HAPPENS ," SLOW DOWN"? THIS IS NOT AN ISOLATED OCCURRENCE UNIQUE TO MY VEHICLE; THERE ARE LITERALLY THOUSANDS
27	WHO HAVE EXPERIENCED THE ABOVE ISSUE. NUMEROUS POST, BLOGS AND VIDEOS
28	ARE AVAILABLE ON LINE, YET FORD CONTINUES TO BLAME THE OCCURRENCE ON LOW TIRE PRESSURE AND PASS THE RESPONSIBILITY FOR CONTROLLING A VERY
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1 2 3 4 5	HAZARDOUS "DEATH WOBBLE" TO THE VEHICLE OWNERS. THIS IS AN ISSUE THEY HAVE KNOWN ABOUT FOR MANY YEARS, YET HAVE FAILED TO TAKE RESPONSIBILITY AND CORRECT THE HIGHLY DANGEROUS CONDITION FORD CREATED. ANY DATA ON HOW MANY ACCIDENTS CAN BE ATTRIBUTED TO THEIR POOR ENGINEERING/DESIGN ELEMENTS THAT OBVIOUSLY CONTRIBUTE TO THE UNSAFE HANDLING OF THEIR 7000 LB PLUSS TRUCKS? 1 Affected Product
6	
7	July 16, 2015 NHTSA ID NUMBER: 10734536
8	Components: STEERING, ENGINE AND ENGINE COOLING NHTSA ID Number: 10734536
-	Incident Date May 29, 2015
9	Consumer Location CODEN, AL Vehicle Identification Number 1FTSW21R88E****
10	Summary of Complaint
11	CRASHNo
12	FIRENo INJURIESO
13	DEATHS0
	TL* THE CONTACT OWNS A 2008 FORD F-250. WHILE DRIVING APPROXIMATELY 60 MPH, THE STEERING WHEEL SHOOK VIOLENTLY AND WOBBLED OUT OF CONTROL. THE
14	CONTACT HAD TO DEPRESS THE BRAKE PEDAL HARSHLY IN ORDER FOR THE FAILURE
15	TO SEIZE. THE CONTACT STATED THAT THE WOBBLING OF THE FRONT END CAUSED
16	THE RADIATOR TO EVENTUALLY BURST. THE FAILURE RECURRED MULTIPLE TIMES. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO REPLACED THE
17	TIRES AND PERFORMED AN ALL WHEEL ALIGNMENT; HOWEVER, THE FAILURE
18	PERSISTED. THE MANUFACTURER INFORMED THE CONTACT THAT THE VIN WAS
	<b>NOT INCLUDED IN ANY RECALLS.</b> THE APPROXIMATE FAILURE MILEAGE WAS 123,000. <b>1 Affected Product</b>
19	
20	August 19, 2013 NHTSA ID NUMBER: 10536189
21	Components: STEERING NHTSA ID Number: 10536189
22	Incident Date July 16, 2013
23	Consumer Location MORRISVILLE, MO Vehicle Identification Number 1FTSX21R18E****
	Summary of Complaint
24	CRASHNo
25	FIRENo INJURIESO
26	DEATHS0
27	TL* THE CONTACT OWNS A 2008 FORD F-250. THE CONTACT STATED THAT WHILE TRAVELING 60 MPH, THE STEERING WHEEL SHOOK VIOLENTLY. <u>THE VEHICLE WAS</u>
28	TAKEN TO THE DEALER WHERE IT WAS FOUND THAT THE STEERING BOX HAD
-	FAILED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE
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1 2 3	MANUFACTURER WAS NOT CONTACTED ABOUT THE FAILURE. THE FAILURE MILEAGE WAS 55,000. 1 Affected Product
4	Lamager 9, 2016 NHTCA ID NUMBED, 10919007
5	January 8, 2016 NHTSA ID NUMBER: 10818907 Components: SERVICE BRAKES, SUSPENSION
_	NHTSA ID Number: 10818907
6	Incident Date January 1, 2012 Consumer Location WOOD RIVER, IL
7	Vehicle Identification Number 1FTWW31P97E****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0
-	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2007 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 55
11	MPH OVER A BUMP, THE FRONT END OF THE VEHICLE AND STEERING WHEEL BEGAN
12	TO VIBRATE VIOLENTLY. THE FAILURE OCCURRED WHEN DRIVING 55 MPH OR
13	GREATER OVER AN UNEVEN ROAD SURFACE OR BUMP. <u>THE CONTACT REPAIRED THE</u> VEHICLE HIMSELF. THE FRONT SHOCKS, ROTORS, AND BRAKES WERE REPLACED.
14	IN ADDITION, THE FRONT WHEEL BEARINGS WERE REPLACED WITH FOUR NEW
	TIRES INSTALLED ON THE VEHICLE. THE FAILURE PERSISTED AFTER THE
15	<b>REPAIRS. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE.</b> THE APPROXIMATE FAILURE MILEAGE WAS 100,000.
16	1 Affected Product
17	
18	March 14, 2013 NHTSA ID NUMBER: 10503036
19	Components: SUSPENSION
-	NHTSA ID Number: 10503036
20	Incident Date February 1, 2012 Consumer Location ALPINE, CA
21	Vehicle Identification Number 1FTWW31P17E****
22	Summary of Complaint
23	CRASHNo FIRENo
	INJURIES0
24	DEATHS0
25	TL* THE CONTACT OWNS A 2007 FORD F-350 SD. THE CONTACT STATED THAT WHILE DRIVING AT AN UNKNOWN SPEED, THE VEHICLE SHOOK VIOLENTLY. <b>THE VEHICLE</b>
26	WAS TAKEN TO A PRIVATE MECHANIC WHERE THE TRACK BAR WAS REPLACED.
27	THE FAILURE RECURRED. THE MANUFACTURER WAS NOT CONTACTED. THE FAILURE
	MILEAGE WAS UNKNOWN. 1 Affected Product
28	
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1	
2	January 17, 2011 NHTSA ID NUMBER: 10376922 Components: STEERING
3	NHTSA ID Number: 10376922
4	Incident Date December 17, 2010 Consumer Location NORTH LAS VEGAS, NV
5	Vehicle Identification Number 1FTNF21507E****
6	Summary of Complaint CRASHNo
Ĩ	FIRENo
7	INJURIES0 DEATHS0
8	FORD SUPER DUTY DEATHWOBBLE. PROBLEM HAS PERSISTED SINCE NEW. FAILURE
9	OCCURS AT SPEEDS BETWEEN 30 AND 75MPH. FAILURE MANIFESTS AS
10	UNCONTROLLABLE STEERING AND WHOLE VEHICLE OSCILLATION. HAS LED TO LOSS OF CONTROL OF VEHICLE MORE TIMES THAN I CAN REMEMBER. UNEVEN ROAD
11	SURFACE INSTIGATES SAID LOSS OF CONTROL. HAVE CHANGED SHOCKS AND
12	SPRINGS, ADDED DUAL STEERING STABILIZER IN ADDITION TO CHANGING STABILIZER IN STOCK LOCATION, BALL JOINT CASTER CAMS ADDED, NEW TIRES
13	ADDED (TWICE) MULTIPLE ALIGNMENTS. MOST CORRECTIVE ACTION TAKEN IS
	NOT TO DRIVE IT AND JEOPARDIZE MY LIFE OR THE LIVES OF OTHERS. HOW MANY NEED TO BE KILLED OR INJURED BEFORE SOMEONE CAN BE HELD ACCOUTABLE? *TR
14	1 Affected Product
15	
16	August 18, 2010 NHTSA ID NUMBER: 10350306
17	Components: STEERING NHTSA ID Number: 10350306
18	Incident Date November 8, 2008
19	Consumer Location SHAMROCK, TX Vehicle Identification Number 1FTSX21527E****
20	Summary of Complaint
21	CRASHNo FIRENo
22	INJURIES0
	DEATHS0 TL* THE CONTACT OWNS A 2007 FORD F-250 SD. WHILE DRIVING APPROXIMATELY 55-60
23	MPH, THE CONTACT DROVE OVER A ROAD BUMP AND VEHICLE BEGAN TO SHAKE
24	VIOLENTLY CAUSING DIFFICULTY IN STEERING. THE BRAKES WERE APPLIED AND THE
25	FAILURE BECAME WORSE. THE FAILURE OCCURRED WHEN ENCOUNTERING ROUGH ROAD CONDITIONS. <b>THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER ON</b>
26	THREE OCCASIONS AND ONE TIME TO AN INDEPENDENT MECHANIC REGARDING
27	THE FAILURE. THE STEERING STABILIZER AND MOUNTING BRACKET WERE REPLACED FOUR TIMES YET THE FAILURE PERSISTED. THE CONTACT WAS IN THE
28	PROCESS OF TAKING THE VEHICLE BACK TO THE AUTHORIZED DEALER FOR
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1	<b><u>FURTHER DIAGNOSIS AND REPAIRS.</u></b> THE FAILURE MILEAGE WAS APPROXIMATELY 40,000.
2	1 Affected Product
3	
4	October 23, 2008 NHTSA ID NUMBER: 10246512
5	Components: STEERING NHTSA ID Number: 10246512
6	Incident Date March 2, 2008
7	Consumer Location ANACOCO, LA Vehicle Identification Number 1FTSW21537E****
8	Summary of Complaint CRASHNo
9	FIRENo
10	INJURIES0
11	<b>DEATHS0</b> TL*THE CONTACT OWNS A 2007 FORD F-250. WHILE DRIVING APPROXIMATELY 60-65
	MPH OR WHILE DRIVING OVER A BUMP, THE FRONT END OF THE VEHICLE SHAKES
12	DRAMATICALLY. THE SHAKING IS SO SEVERE THAT THE CONTACT MUST APPLY THE BRAKES TO DECREASE THE SPEED AND STOP THE SHAKING. <u>A FEW MONTHS AFTER</u>
13	THE FAILURE OCCURRED, THE DEALER REPLACED THE STEERING DAMPENER. SIX
14	MONTHS AFTER THE REPAIR, THE FAILURES RECURRED. THE DEALER TEST DROVE THE VEHICLE, BUT WERE UNABLE TO DUPLICATE THE FAILURE. THEY
15	STATED THAT NOTHING COULD BE DONE. THE CONTACT BELIEVES THAT THE
16	VEHICLE SHOULD BE RECALLED. <u>THE FAILURE MILEAGE WAS 17,000 AND CURRENT</u> MILEAGE WAS 21,995. UPDATED 11-25-08 *BF UPDATED 11/26/08. *JB
17	1 Affected Product
18	1 Associated Document
19	
	November 2, 2010 NHTSA ID NUMBER: 10363770
20	Components: SUSPENSION NHTSA ID Number: 10363770
21	Incident Date August 15, 2010
22	Consumer Location LOOMIS, CA Vehicle Identification Number 1FTWW33P36E****
23	Summary of Complaint
24	CRASHNo FIRENo
25	INJURIES0
26	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2006 FORD F-350 SUPER DUTY. THE CONTACT WAS DRIVING
27	APPROXIMATELY 60 MPH OVER A ROAD BUMP WHEN THE CONTACT LOST ALL
28	STEERING CONTROL. HE HAD TO DECREASE THE VEHICLES' SPEED TO 30 MPH TO REGAIN STEERING CONTROL. THE VEHICLE WAS TAKEN TO A LOCAL MECHANIC
	WHERE THE STEERING BUSHING, SHOCKS, LOWER CONTROL, AND IDLER ARMS
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1 2 3 4 5	WERE REPLACED. THE FAILURE RECURRED WITHIN THREE WEEKS OF THE REPAIRS. THE CONTACT LOCATED AN INVESTIGATION (NHTSA ITEM NUMBER: PE07057- SUSPENSION:FRONT) WHICH DESCRIBED FAILURE AND INQUIRED WITH THE DEALER. THE DEALER SET THE TIRE PRESSURE TO THE CORRECT MANUFACTURER'S SPECIFICATIONS TO CORRECT THE FAILURE. THE FAILURE MILEAGE WAS 86,800 AND THE CURRENT MILEAGE WAS 86,444. 1 Affected Product
6	
7	January 25, 2016 NHTSA ID NUMBER: 10822088 Components: STEERING, SUSPENSION
8	NHTSA ID Number: 10822088
9	Incident Date February 28, 2005 Consumer Location ALBUQUERQUE, NM
-	Vehicle Identification Number 1FTWW33P26E****
10	Summary of Complaint CRASHNo
11	FIRENo
12	INJURIES0 DEATHS0
13	TL* THE CONTACT OWNS A 2006 FORD F-350. WHILE DRIVING OVER A BUMP AT 35 MPH,
14	THE VEHICLE VIBRATED VIOLENTLY. IN ADDITION, THE STEERING WHEEL ALSO
15	VIBRATED. <u>THE FAILURE RECURRED ON NUMEROUS OCCASIONS. THE VEHICLE</u> WAS TAKEN TO A DEALER, BUT THE CONTACT WAS UNSURE AS TO WHAT REPAIR
	WAS PERFORMED ON THE FRONT SUSPENSION OF THE VEHICLE. THE FAILURE
16	<b>PERSISTED.</b> THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 120.
17	1 Affected Product
18	
19	April 2, 2014 NHTSA ID NUMBER: 10576849
20	Components: STEERING, SUSPENSION
21	NHTSA ID Number: 10576849
22	Incident Date April 2, 2008 Consumer Location HERMOSA BEACH, CA
	Vehicle Identification Number 1FTWX31P66E****
23	Summary of Complaint CRASHNo
24	FIRENo
25	INJURIES0
26	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2006 FORD F-350. THE CONTACT STATED THAT THE
27	SUSPENSION WAS UNSTABLE AND WOULD SHAKE WHILE THE VEHICLE WAS BEING
	DRIVEN AROUND A CURVE OR AT VARIOUS SPEEDS SPORADICALLY. <u>THE CONTACT</u> TOOK THE VEHICLE TO THE DEALER FOR DIAGNOSTIC TESTING WHERE THE
28	DEALER REPLACED THE POWER STEERING HOSES AND THE STEERING STABILIZER
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1 2 3 4	<b>HOWEVER, THE FAILURE PERSISTED.</b> THE VEHICLE WAS THEN TAKEN TO AN INDEPENDENT MECHANIC, WHO STATED THAT A CASTER ADJUSTMENT WOULD NEED TO BE PERFORMED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE BUT DECLINED TO PROVIDE THE CONTACT A REMEDY TO REPAIR THE VEHICLE. THE FAILURE MILEAGE WAS 20,000. <b>1 Affected Product</b>
5	
6	July 14, 2011 NHTSA ID NUMBER: 10412372 Components: STEERING, SUSPENSION
7	NHTSA ID Number: 10412372
8	Incident Date July 14, 2011
9	Consumer Location PORT ORANGE, FL Vehicle Identification Number N/A
10	Summary of Complaint CRASHNo
11	FIRENO
12	INJURIES0 DEATHS0
13	2006 FORD F350 EXPERIENCE EXTREMELY VIOLENT SHAKING WHEN DRIVING 45 PLUS
14	MPH AND HIT ANY TYPE BUMP. SHAKING IS SO VIOLENT STEERING IS NOT CAPABLE AND BRAKING ONLY MAKES SHAKING WORSE. <u>I'VE CONTACTED DEALER AND THEY</u>
	SAID THEY REPLACED A BUSHING BUT PROBLEM PERSISTED. THEY HAVE NOT
15	CORRECTED THE PROBLEM. VEHICLE IS BASICALLY OUT OF CONTROL WHEN THIS HAPPENS. LAST DATE OF OCCURRENCE IS JULY 14,2011 AND THIS PROBLEM HAS
16	PERSISTED SINCE TRUCK WAS PURCHASED NEW FROM DEALER. TRUCK HAS NO LIFT
17	AND IS STOCK MODEL. PLEASE HELP! *TR 1 Affected Product
18	1 Anecteu 1 Iouuct
19	
20	January 26, 2012 NHTSA ID NUMBER: 10445440 Components: STEERING
21	NHTSA ID Number: 10445440
	Incident Date May 2, 2011 Consumer Location Unknown
22	Vehicle Identification Number 1FTSX21516E****
23	Summary of Complaint CRASHNo
24	FIRENo
25	INJURIES0
26	<b>DEATHS0</b> TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT STATED THAT THE
27	VEHICLE WOULD VIOLENTLY WOBBLE WHILE DRIVING AT HIGHWAYS SPEEDS. THE
28	DEALER ATTEMPTED TO REPAIR THE VEHICLE, BUT THE FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED, BUT DENIED ANY ASSISTANCE WITH REPAIRS.
20	THE FAILURE MILEAGE WAS 37,000 AND THE CURRENT MILEAGE WAS 47,600.
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1	1 Affected Product
2 3	September 21, 2011 NHTSA ID NUMBER: 10426658
4	Components: STEERING NHTSA ID Number: 10426658
5	Incident Date September 18, 2011
	Consumer Location EL CENTRO, CA Vehicle Identification Number 1FTSW21P96E****
6	Summary of Complaint
7	CRASHNo
8	FIRENo INJURIESO
9	DEATHS0
10	TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT STATED THAT WHILE DRIVING 70 MPH OVER SMALL ROAD BUMPS, HE LOST CONTROL OF THE STEERING.
11	THE VEHICLE BEGAN TO VIOLENTLY SHAKE UNTIL THE CONTACT STOPPED THE
	VEHICLE. THE FAILURE RECURRED WHENEVER THE CONTACT DROVE OVER ROAD
12	BUMPS AT HIGHWAY SPEEDS. <u>THE VEHICLE WAS TAKEN TO AN AUTHORIZED</u> DEALER WHERE THE CONTACT WAS INFORMED THAT THE FAILURE WAS A
13	COMMON OCCURRENCE. THE STEERING LINKAGES AND STEERING DAMPENER
14	WERE REPAIRED. THE FAILURE RECURRED ONCE FOLLOWING REPAIRS. THE FAILURE MILEAGE WAS 43,200. UPDATED 10/13/11 *BF UPDATED 01/12/12
15	1 Affected Product
16	1 Associated Document
17	
	December 20, 2011 NHTSA ID NUMBER: 10440552
18	Components: STEERING NHTSA ID Number: 10440552
19	Incident Date December 20, 2010
20	Consumer Location MILLER PLACE, NY
21	Vehicle Identification Number 1FTWX31515E**** Summary of Complaint
22	CRASHNo
23	FIRENo INJURIESO
24	DEATHS0
	TL* THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT THE VEHICLE WOULD SHAKE VIOLENTLY WHILE DRIVING OVER 50 MPH. <b>THE</b>
25	MANUFACTURER WAS NOTIFIED OF THE FAILURE, BUT DENIED ANY ASSISTANCE
26	WITH REPAIRS TO THE VEHICLE. THE CONTACT MADE ATTEMPTS TO REPAIR THE
27	FAILURE, BUT THE DEFECT CONTINUOUSLY RECURRED. THE FAILURE MILEAGE WAS 45,000 AND THE CURRENT MILEAGE WAS 60,000.
28	1 Affected Product
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	October 1, 2008 NHTSA ID NUMBER: 10244101 Components: STEERING, SUSPENSION NHTSA ID Number: 10244101 Incident Date January 20, 2006 Consumer Location DESOTO, MO Vehicle Identification Number 1FDWW37P25E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F-350 SUPER DUTY. IN JANUARY OF 2006, WHILE DRIVING APPROXIMATELY 35 MPH OR MORE, THE VEHICLE BEGAN TO SHIMMY AND JUMP ON THE OPPOSITE SIDE OF THE ROAD WHEN MAKING LEFT TURNS. <u>THE DEALER STATED THAT BOLTS WERE MISSING AND THE SHOCK MOUNTS FAILED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED. HE RETURNED THE VEHICLE TO THE DEALER AND WAS INFORMED THAT THE TIRES NEEDED TO BE REPLACED. AFTER REPLACING THE TIRES, A FRONT STABLIZER WAS INSTALLED ON THE FRONT END OF THE VEHICLE; HOWEVER, THE FAILURE PERSISTED. THE VEHICLE HAS NOT BEEN REPARED SINCE THE LAST INCIDENT. <u>THE MANUFACTURER STATED THAT THERE WERE NO RECALLS AND THEY WERE NOT LIABLE FOR THE REPARS. THE CURRENT MILEAGE WAS 61,635 AND FAILURE MILEAGE WAS 4,000. UPDATED 10/21/08. *JB 1 Affected Product 1 Associated Document</u></u>
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ol>	February 9, 2010 NHTSA ID NUMBER: 10307928 Components: SUSPENSION NHTSA ID Number: 10307928 Incident Date August 10, 2009 Consumer Location BOCA RATON, FL Vehicle Identification Number 1FTSW21P15E**** Summary of Complaint CRASHNo FIRENo INJURIES0 DEATHS0 TL*THE CONTACT OWNS A 2005 FORD F250. WHILE DRIVING THE VEHICLE BEGAN TO SHAKE VIOLENTLY. HE ALSO BEGAN TO EXPERIENCE A VIOLENT FRONT END SHAKING AT HIGHWAY SPEEDS OF OVER 10 MPH WHEN DRIVING OVER MINIMAL BUMPS IN THE ROAD AND UNEVEN SURFACES. <u>THE FORD DEALER WAS CONTACTED AND THEY</u> ADVISED THE CONTACT TO HAVE AN ALIGNMENT PERFORMED AND TO ROTATE HIS TIRES WHICH DID NOT CORRECT THE FAILURE. HE ALSO HAD SHOCKS INSTALLED IN AN ATTEMPT TO CORRECT THE FAILURE; HOWEVER, THE FAILURE -337- Class Action Complaint
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# **PERSISTED.** THERE WERE NO ADDITIONAL REPAIRS MADE TO THE VEHICLE IN AN ATTEMPT TO CORRECT THE FAILURE. THE FAILURE AND CURRENT MILEAGES WERE UNDER 85,000. UPDATED 3/10/10 \*CN UPDATED 06/04/10\*JB

1 Affected Product 1 Associated Document

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69. Furthermore, as set forth in the above, a number of Class Members who presented their Class Vehicles to Ford dealerships because of issues related to the Defect were denied warranty repairs and, instead, were informed that nothing was wrong with their vehicles. As a result, after expiration of the warranty period, Class Members are forced to pay costly repairs to correct the defect.

E. Plaintiff William Lessin's 2011 Ford F-250

70. On April 24, 2018, Plaintiff William Lessin brought his 2011 F-250 ("the Vehicle") to Mossy Ford of San Diego to have the service department address the Death Wobble. Attempting to eradicate the problem, Mossy Ford replaced the Vehicle's front suspension tie, dampers, and ball joints, and Plaintiff paid \$1,231 for the repairs. However, despite the replacement of these parts, the Vehicle continued experience the Death Wobble. On June 15, 2018, Plaintiff returned to Mossy Ford and informed the service department of the continuation of the problem. On recommendation of the service technician, Plaintiff replaced the front shock absorbers at an additional cost of \$375.75. But again, this repair did not eliminate the Death Wobble. Being out of repair options, Plaintiff was left with no explanation or method of recourse to address the Vehicle's hazardous Defect.

### VI TOLLING OF STATUTES OF LIMITATIONS

71. Any applicable statute(s) of limitations have been tolled by Defendant's knowing and active concealment and denial of the facts alleged herein. Plaintiff and the Members of the Class could not have reasonably discovered the true, latent nature of the Defect until shortly before this class action litigation was commenced.

72. In addition, even after Plaintiff and Class Members contacted Ford and/or its authorized dealers for vehicle repairs concerning the Defect, they were routinely told by Defendant and/or through its dealers that the Class Vehicles were not defective, as set forth above, when the true cause of the

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premature and catastrophic failure in the Class Vehicles are defectively designed or manufactured
 suspension and steering linkage components that results in the Death Wobble.

73. Defendant Ford was and remains under a continuing duty to disclose to Plaintiff and the Members of the Class the true character, quality, and nature of the Class Vehicles, that they will require costly repairs, pose safety concerns, and diminish the resale value of the Class Vehicles. As a result of the active concealment by Defendant Ford, any and all applicable statutes of limitations otherwise applicable to the allegations herein have been tolled.

### VII CLASS ALLEGATIONS

74. Plaintiff bring this action on their own behalf, and on behalf of a nationwide class pursuant to Federal Rules of Civil Procedure, Rules 23(a), 23(b)(2), and/or 23(b)(3).

### Nationwide Class:

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75. All persons or entities in the United States who are current or former owners and/or lessees of a Class Vehicle.

76. In the alternative to the Nationwide Class, and pursuant to Federal Rules of Civil Procedure, Rule 23(c)(5), Plaintiff seek to represent the California Class only in the event that the Court declines to certify the Nationwide Class above.

### California Class:

77. All persons or entities in California who are current or former owners and/or lessees of a Class Vehicle for primarily personal, family or household purposes, as defined by California Civil Code § 1791(a).

78. Together, the California Class and the Nationwide Class shall be collectively referred to herein as the "Class." Excluded from the Class are Ford, their affiliates, employees, officers and directors, persons or entities that purchased the Class Vehicles for resale, and the Judge(s) assigned to this case. Plaintiff reserves the right to modify, change, or expand the Class definitions based on discovery and further investigation.

79. Numerosity: Upon information and belief, the Class is so numerous that joinder of all
Members is impracticable. While the exact number and identities of individual Members of the Class are
unknown at this time, such information being in the sole possession of Defendant and obtainable by

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Plaintiff only through the discovery process, Plaintiff believes, and on that basis allege, that hundreds of thousands of Class Vehicles have been sold and leased in each of the states that are the subject of the Class.

80. **Existence and Predominance of Common Questions of Fact and Law:** Common questions of law and fact exist as to all Members of the Class. These questions predominate over the questions affecting individual Class Members. These common legal and factual questions include, but are not limited to, whether:

- a. The Class Vehicles were sold with defects;
- b. Defendant knew of the defects but failed to disclose the problems and its consequences to their customers;
- c. A reasonable consumer would consider the defect or its consequences to be material;
- d. Defendant should be required to disclose the existence of the defect; and
- e. Defendant's conduct violates the California Legal Remedies Act, California Unfair Competition Law, and the other statutes asserted herein.

81. **Typicality:** All of Plaintiff's claims are typical of the claims of the Class because Plaintiff purchased Class Vehicles with the same steering linkage/suspension defects and defective vehicle design, as did each member of the Class. Furthermore, Plaintiff and all Members of the Class sustained monetary and economic injuries including, but not limited to, ascertainable losses arising out of Defendant's wrongful conduct. Plaintiff is advancing the same claims and legal theories on behalf of himself and all absent Class Members.

82. Adequacy: Plaintiff is an adequate representative because his interests do not conflict with the interests of the Class that he seeks to represent, he has retained counsel who are competent and highly experienced in complex class action litigation, and they intend to prosecute this action vigorously. The interests of the Class will be fairly and adequately protected by Plaintiff and his counsel.

83. **Superiority:** A class action is superior to all other available means of fair and efficient adjudication of the claims of Plaintiff and Members of the Class. The injury suffered by each individual Class member is relatively small in comparison to the burden and expense of individual prosecution of the complex and extensive litigation necessitated by Defendant's conduct. It would be virtually impossible for Members of the Class individually to redress effectively the wrongs done to them. Even

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if the Members of the Class could afford such individual litigation, the court system could not. 1 2 Individualized litigation presents a potential for inconsistent or contradictory judgments. Individualized 3 litigation increases the delay and expense to all parties, and to the court system, presented by the 4 complex legal and factual issues of the case. By contrast, the class action device presents far fewer 5 management difficulties, and provides the benefits of single adjudication, an economy of scale, and comprehensive supervision by a single court. Upon information and belief, Members of the Class can be 6 7 readily identified and notified based on, inter alia, Defendant's vehicle identification numbers, warranty 8 claims, registration records, and database of complaints.

84. Defendant has acted, and refused to act, on grounds generally applicable to the Class, thereby making appropriate final equitable relief with respect to the Class as a whole.

## VIII CLASS ALLEGATIONS

### FIRST CAUSE OF ACTION

VIOLATIONS OF CALIFORNIA'S CONSUMER LEGAL REMEDIES ACT ("CLRA") (Cal.

### Civ. Code § 1750, et seq.)

### (On Behalf of the Nationwide Class or, Alternatively, the California Class)

85. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph as though fully set forth at length herein.

86. Plaintiff brings this claim on behalf of himself and on behalf of the Nationwide Class. Alternatively, Plaintiff Shaw brings this claim on behalf of himself and on behalf of the California Class against Defendant.

87. Defendant is a "person" as that term is defined in California Civil Code § 1761(c).

88. Plaintiff and the Class Members are "consumers" as that term is defined in California Civil Code §1761(d).

89. Defendant engaged in unfair and deceptive acts in violation of the CLRA by the practices described above, and by knowingly and intentionally concealing from Plaintiff and Class Members that the Class Vehicles suffer from a defect(s) (and the costs, risks, and diminished value of the vehicles as a result of this problem). These acts and practices violate, at a minimum, the following sections of the CLRA:

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1 2 3		(a)(5) Representing that goods or services have sponsorships, characteristics, uses, benefits or quantities which they do not have, or that a person has a sponsorship, approval, status, affiliation or connection which he or she does not have;
4		(a)(7) Representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another; and
5 6		(a)(9) Advertising goods and services with the intent not to sell them as advertised.
7	90.	Defendant's unfair or deceptive acts or practices occurred repeatedly in Defendant's trade
8	or business, w	ere capable of deceiving a substantial portion of the purchasing public, and imposed a
9	serious safety	risk on the public.
10	91.	Defendant knew that the Class Vehicles and steering-linkage and suspensions were
11	defectively de	signed or manufactured, would fail prematurely, and were not suitable for their intended
12	use.	
13	92.	Defendant was under a duty to Plaintiff and the Class Members to disclose the defective
14	nature of the (	Class Vehicles and the Defect because:
15 16		a. Defendant was in a superior position to know the true state of facts about the safety defect and associated repair costs in the Class Vehicles and their suspensions/steering linkage;
17 18		b. Plaintiff and the Class Members could not reasonably have been expected to learn or discover that the Class Vehicles had dangerous safety defect until manifestation of the defect;
19 20		c. Defendant knew that Plaintiff and the Class Members could not reasonably have been expected to learn or discover the safety and security defect and the associated repair costs that it causes until the manifestation of the defect; and
21 22		d. Defendant actively concealed the safety and the associated repair costs by asserting to Plaintiff and Class Members that the cause of the Death Wobble was the result of under over inflated tires despite knowing the repairs needed to correct the Defect.
23	93.	In failing to disclose the Defect and the associated safety risks and repair costs that result
24	from it, Defen	dant has knowingly and intentionally concealed material facts and breached their duty to
25	disclose.	
26	94.	The facts concealed or not disclosed by Defendant to Plaintiff and the Class Members are
27	material in the	at a reasonable consumer would have considered them to be important in deciding whether
28	to purchase D	efendant's Class Vehicles or pay a lesser price. Had Plaintiff and the Class known about -342-
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the defective nature of the Class Vehicles they would not have purchased the Class Vehicles or would
 have paid less for them.

95. Plaintiff provided Defendant with notice of its violations of the CLRA pursuant to California Civil Code § 1782(a) on May 14, 2019, and seeks injunctive relief. After the 30-day notice period expires, Plaintiff will amend this complaint to seek monetary damages under the CLRA.

6 96. Plaintiff and the other Class Members' injuries were proximately caused by Defendant's
7 fraudulent and deceptive business practices.

97. Plaintiff has attached hereto the declaration of venue required by Civil Code § 1780(d).

98. Therefore, Plaintiff and the other Class Members seek injunctive relief under the CLRA.

### SECOND CAUSE OF ACTION

### VIOLATIONS OF THE CALIFORNIA UNFAIR COMPETITION LAW (Cal. Bus. & Prof. Code § 17200)

### (On Behalf of the Nationwide Class or, Alternatively, the California Class)

99. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph as though fully set forth at length herein.

100. Plaintiff brings this claim on behalf of himself and on behalf of the Nationwide Class. Alternatively, Plaintiff brings this claim on behalf of himself and on behalf of the California Class against Defendant.

101. The California Unfair Competition Law ("UCL") prohibits acts of "unfair competition," including any "unlawful, unfair or fraudulent business act or practice" and "unfair, deceptive, untrue or misleading advertising." Cal. Bus. & Prof. Code § 17200.

102. Defendant have engaged in unfair competition and unfair, unlawful, or fraudulent
business practices by the conduct, statements, and omissions described above, and by knowingly and
intentionally concealing from Plaintiff and the Class Members that the Class Vehicles suffer from a
defect (and the costs, safety risks, and diminished value of the vehicles as a result of these problems).
Defendant should have disclosed this information because they were in a superior position to know the

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true facts related to the defect, and Plaintiff and Class Members could not reasonably be expected to
 learn or discover the true facts related to the Defect.

103. The defective suspension and steering linkage system constitute a safety issue that triggered Defendant's duty to disclose the safety issue to consumers.

104. These acts and practices have deceived Plaintiff and are likely to deceive the public. In failing to disclose the defect and suppressing other material facts from Plaintiff and the Class Members, Defendant breached its duty to disclose these facts, violated the UCL, and caused injuries to Plaintiff and the Class Members. The omissions and acts of concealment by Defendant pertained to information that was material to Plaintiff and the Class Members, as it would have been to all reasonable consumers.

105. The injuries suffered by Plaintiff and the Class Members are greatly outweighed by any potential countervailing benefit to consumers or to competition, nor are they injuries that Plaintiff and the Class Members should have reasonably avoided.

106. Defendant's acts and practices are unlawful because they violate California Civil Code§§ 1668, 1709, 1710, and 1750 et seq., and California Commercial Code § 2313.

107. Plaintiff seeks to enjoin further unlawful, unfair, and/or fraudulent acts or practices by Defendant, to obtain restitutionary disgorgement of all monies and revenues generated as a result of such practices, and all other relief allowed under California Business & Professions Code § 17200.

### THIRD CAUSE OF ACTION

### VIOLATION OF CALIFORNIA FALSE ADVERTISING LAW

(Cal. Bus. & Prof. Code § 17500, et seq.)

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### (On Behalf of the Nationwide Class or, Alternatively, the California Class)

108. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph as though fully set forth at length herein.

109. Plaintiff brings this claim on behalf of himself and on behalf of the Nationwide Class. Alternatively, Plaintiff brings this claim on behalf of himself and on behalf of the California Class against Defendant.

27 110. California Business & Professions Code § 17500 states: "It is unlawful for any ...
28 corporation ... with intent directly or indirectly to dispose of real or personal property ... to induce the

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public to enter into any obligation relating thereto, to make or disseminate or cause to be made or 2 disseminated . . . from this state before the public in any state, in any newspaper or other publication, or 3 any advertising device, ... or in any other manner or means whatever, including over the Internet, any 4 statement . . . which is untrue or misleading, and which is known, or which by the exercise of reasonable care should be known, to be untrue or misleading."

Defendant caused to be made or disseminated through California and the United States, 111. through advertising, marketing and other publications, statements that were untrue or misleading, and which were known, or which by the exercise of reasonable care should have been known to Defendant, to be untrue and misleading to consumers, including Plaintiff and the other Class Members.

112. Defendant has violated section 17500 because the misrepresentations and omissions regarding the safety, reliability, and functionality of their Class Vehicles as set forth in this Complaint were material and likely to deceive a reasonable consumer.

Plaintiff and the other Class Members have suffered an injury in fact, including the loss 113. of money or property, as a result of Defendant's unfair, unlawful, and/or deceptive practices. In purchasing or leasing their Class Vehicles, Plaintiff and the other Class Members relied on the misrepresentations and/or omissions of Defendant with respect to the safety and reliability of the Class Vehicles. Defendant's representations were untrue because the Class Vehicles are distributed with defective suspensions and steering linkage. Had Plaintiff and the other Class Members known this, they would not have purchased or leased their Class Vehicles or would not have paid as much for them. Accordingly, Plaintiff and the other Class Members overpaid for their Class Vehicles and did not receive the benefit of their bargain.

All of the wrongful conduct alleged herein occurred, and continues to occur, in the 114. conduct of Defendant's businesses. Defendant's wrongful conduct is part of a pattern or generalized course of conduct that is still perpetuated and repeated, both in the state of California and nationwide.

Plaintiff, individually and on behalf of the other Class Members, request that this Court 115. enter such orders or judgments as may be necessary to enjoin Defendant from continuing their unfair, unlawful, and/or deceptive practices and to restore to Plaintiff and the other Class Members any money

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Defendant acquired by unfair competition, including restitution and/or restitutionary disgorgement, and 1 2 for such other relief set forth below.

### FOURTH CAUSE OF ACTION

### **BREACH OF EXPRESS WARRANTY**

### (On Behalf of the Nationwide Class or, Alternatively, the California Class)

116. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph 6 as though fully set forth at length herein.

Plaintiff brings this claim on behalf of himself and on behalf of the Nationwide Class or, 117. alternatively, on behalf of the California Class.

10 Defendant provided all purchasers and lessees of the Class Vehicles with the express 118. warranties described herein, which became part of the basis of the bargain. Accordingly, Defendant's 12 warranties are express warranties under state law.

The parts affected by the defect were distributed by Defendant in the Class Vehicles and 119. are covered by the warranties Defendant provided to all purchasers and lessors of Class Vehicles.

120. Defendant breached these warranties by selling and leasing Class Vehicles with the Defect, requiring repair or replacement within the applicable warranty periods, and refusing to honor the warranties by providing free repairs or replacements during the applicable warranty periods.

121. Plaintiff notified Defendant of the breach within a reasonable time, and/or were not required to do so because affording Defendant a reasonable opportunity to cure their breaches of written warranty would have been futile. Defendant also knew of the Defect and yet have chosen to conceal it and to fail to comply with their warranty obligations.

122. As a direct and proximate cause of Defendant's breach, Plaintiff and the other Class Members bought or leased Class Vehicles they otherwise would not have, overpaid for their vehicles, did not receive the benefit of their bargain, and their Class Vehicles suffered a diminution in value. Plaintiff and Class Members have also incurred and will continue to incur costs related to the diagnosis and repair of the Defect.

27 Any attempt to disclaim or limit these express warranties vis-à-vis consumers is 123. unconscionable and unenforceable under the circumstances here. Specifically, Defendant's warranty 28

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limitation is unenforceable because they knowingly sold a defective product without informing
 consumers about the defect.

124. The time limits contained in Defendant's warranty period were also unconscionable and inadequate to protect Plaintiff and Members of the Class. Among other things, Plaintiff and Class Members had no meaningful choice in determining these time limitations, the terms of which unreasonably favored Defendant. A gross disparity in bargaining power existed between Defendant and the Class Members, and Defendant knew or should have known that the Class Vehicles were defective at the time of sale and would fail well before their useful lives.

125. Plaintiff and the Class Members have complied with all obligations under the warranty, or otherwise have been excused from performance of said obligations as a result of Defendant's conduct described herein.

### FIFTH CAUSE OF ACTION BREACH OF IMPLIED WARRANTY

### (On Behalf of the Nationwide Class or, Alternatively, the California Class)

126. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph as though fully set forth at length herein.

127. Plaintiff bring this claim on behalf of himself and on behalf of the Nationwide Class or, alternatively, on behalf of the California Class.

128. Defendant was at all relevant times the manufacturer, distributor, warrantor, and/or seller of the Class Vehicles. Defendant knew or had reason to know of the specific use for which the Class Vehicles were purchased.

129. Defendant provided Plaintiff and the other Class Members with an implied warranty that the Class Vehicles and any parts thereof are merchantable and fit for the ordinary purposes for which they were sold. However, the Class Vehicles are not fit for their ordinary purpose of providing reasonably reliable and safe transportation at the time of sale or thereafter because, inter alia, the Class Vehicles suffered from defective suspension and steering linkage system at the time of sale that causes the vehicles to experience severe shaking of the front-end and steering wheel. Therefore, the Class Vehicles are not fit for their particular purpose of providing safe and reliable transportation.

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130. Defendant impliedly warranted that the Class Vehicles were of merchantable quality and
 fit for such use. This implied warranty included, among other things: (i) a warranty that the Class
 Vehicles and their suspensions and steering linkage systems were manufactured, supplied, distributed,
 and/or sold by Defendant were safe and reliable for providing transportation and would not experience
 premature suspension and steering failure; and (ii) a warranty that the Class Vehicles would be fit for
 their intended use while the Class Vehicles were being operated.

131. Contrary to the applicable implied warranties, the Class Vehicles at the time of sale and thereafter were not fit for their ordinary and intended purpose of providing Plaintiff and the other Class Members with reliable, durable, and safe transportation. Instead, the Class Vehicles suffer from a defective design(s) and/or manufacturing defect(s).

132. Defendants' actions, as complained of herein, breached the implied warranty that the Class Vehicles were of merchantable quality and fit for such use.

### **SIXTH CAUSE OF ACTION**

### BREACH OF WRITTEN WARRANTY UNDER THE MAGNUSON-MOSS WARRANTY

### ACT

### (15 U.S.C. § 2301, et seq.)

### (On behalf of the Nationwide Class or, Alternatively, the California Class)

18 133. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph
19 as though fully set forth at length herein.

134. Plaintiff bring this claim on behalf of himself and on behalf of the Nationwide Class or, alternatively, on behalf of the state subclasses.

135. Plaintiff and the Class are "consumers" within the meaning of the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(3).

- 136. Defendant are suppliers and warrantors within the meaning of 15 U.S.C. §§ 2301(4)-(5).
- 137. The Class Vehicles are "consumer products" within the meaning of 15 U.S.C. § 2301(1).
- 138. Defendant's 5 year/60,000 miles Basic Warranty and 10 year/100,000 miles Powertrain

27 Warranty are "written warranties" within the meaning of 15 U.S.C. § 2301(6).

139. Defendant breached the express warranties by:

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ase 3:19-cv-01082-AJB-AHG Document 1 Filed 06/10/19 PageID.349 Page 349 of 353 Selling and leasing Class Vehicles with suspensions/steering linkage 1 a. system that were defective in materials and/or workmanship, requiring repair or replacement within the warranty period; and 2 Refusing and/or failing to honor the express warranties by repairing or 3 b. replacing, free of charge, the suspension or any of its component parts in order to remedy the Death Wobble. 4 5 140. Plaintiff and the other Class Members relied on the existence and length of the express 6 warranties in deciding whether to purchase or lease the Class Vehicles. 7 141. Defendant's breach of the express warranties has deprived Plaintiff and the other Class 8 Members of the benefit of their bargain. 9 142. The amount in controversy of Plaintiff's individual claims meets or exceeds the sum or value of \$25.00. In addition, the amount in controversy meets or exceeds the sum or value of \$50,000 10 11 (exclusive of interests and costs) computed on the basis of all claims to be determined in this suit. 12 143. Defendant has been afforded a reasonable opportunity to cure their breach of the written 13 warranties and/or Plaintiff and the other Class Members were not required to do so because affording 14 Defendant a reasonable opportunity to cure their breach of written warranties would have been futile. 15 Defendant was also on notice of the alleged defect from the complaints and service requests it received from Class Members, as well as from their own warranty claims, customer complaint data, and/or parts 16 17 sales data. 18 As a direct and proximate cause of Defendant's breach of the written warranties, Plaintiff 144. 19 and the other Class Members sustained damages and other losses in an amount to be determined at trial. 20 Defendant's conduct damaged Plaintiff and the other Class Members, who are entitled to recover actual 21 damages, consequential damages, specific performance, diminution in value, costs, including statutory 22 attorney fees and/or other relief as deemed appropriate. 23 **SEVENTH CAUSE OF ACTION** 24 **COMMON LAW FRAUDULENT CONCEALMENT** 25 (On Behalf of the Nationwide Class or, Alternatively, the California Class Class) 26 145. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph

27 as though fully set forth at length herein.

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146. Plaintiff brings this claim on behalf of himself and on behalf of the Nationwide Class or, alternatively, on behalf of the state subclasses.

147. Defendant made material omissions concerning a presently existing or past fact. For example, Defendant did not fully and truthfully disclose to their customers the true nature of the inherent defect of the Class Vehicles, which was not readily discoverable until years later. As a result, Plaintiff and the other Class Members were fraudulently induced to lease and/or purchase the Class Vehicles with the said defect and all of the resultant problems.

148. These omissions were made by Defendant with knowledge of their falsity, and with the intent that Plaintiff and the Class Members rely on them.

149. Plaintiff and the Class Members reasonably relied on these omissions and suffered damages as a result.

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### EIGHT CAUSE OF ACTION BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING

### (On Behalf of the Nationwide Class or, Alternatively, the California Class Class)

150. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph as though fully set forth at length herein.

151. Plaintiff brings this claim on behalf of himself and on behalf of the Nationwide Class or, alternatively, on behalf of the California Class.

152. All contracts in California, and throughout the United States, have an implied covenant of good faith and fair dealing. The implied covenant of good faith and fair dealing is an independent duty and may be breached even if there is no breach of a contract's express terms.

153. Defendant breached the covenant of good faith and fair dealing by, inter alia, failing to notify Plaintiff and Class Members of the defective suspension system and steering linkage in the Class Vehicles, and failing to fully and properly repair this defect.

154. Defendant acted in bad faith and/or with a malicious motive to deny Plaintiff and the
Class Members some benefit of the bargain originally intended by the parties, thereby causing them
injuries in an amount to be determined at trial.

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### NINTH CAUSE OF ACTION

### VIOLATION OF THE SONG-BEVERLY ACT – BREACH OF IMPLIED WARRANTY

### (Cal. Civ. Code §§ 1792, 1791.1, et seq.)

### (On Behalf of the Nationwide Class or, Alternatively, the California Class)

155. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph as though fully set forth at length herein.

156. Plaintiff brings this claim on behalf of himself and on behalf of the Nationwide Class or, alternatively, on behalf of the California Class.

157. At all relevant times hereto, Defendant was the manufacturer, distributor, warrantor, and/or seller of the Class Vehicles. Defendant knew or should have known of the specific use for which the Class Vehicles were purchased.

158. Defendant provided Plaintiff and the Class Members with an implied warranty that the Class Vehicles, and any parts thereof, are merchantable and fit for the ordinary purposes for which they were sold. The Class Vehicles, however, are not fit for their ordinary purpose because, inter alia, the Class Vehicles suffered from an inherent defect at the time of sale that causes the Class Vehicles to experience the Death Wobble.

159. The Class Vehicles are not fit for the purpose of providing safe and reliable transportation because of the defect.

160. Defendant impliedly warranted that the Class Vehicles were of merchantable quality and fit for such use. This implied warranty included, inter alia, the following: (i) a warranty that the Class Vehicles were manufactured, supplied, distributed, and/or sold by Defendant were safe and reliable for providing transportation and would not prematurely and catastrophically fail; and (ii) a warranty that the Class Vehicles would be fit for their intended use – providing safe and reliable transportation – while the Class Vehicles were being operated.

25 161. Contrary to the applicable implied warranties, the Class Vehicles were not fit for their
26 ordinary and intended purpose. Instead, the Class Vehicles are defective, including, but not limited to,
27 the suspension and steering linkage defect.

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Class Action Complaint Case No.

1	162.	Defendant's actions, as complained of herein, breached the implied warranty that the
2	Class Vehicle	s were of merchantable quality and fit for such use in violation of California Civil Code
3	§§ 1792 and 1	791.1.
4		IX PRAYER FOR RELIEF
5	WHE	REFORE, Plaintiff, on behalf of himself and Members of the Class, respectfully request
6	that this Cour	t:
7	a.	determine that the claims alleged herein may be maintained as a class action under Rule
8		23 of the Federal Rules of Civil Procedure, and issue an order certifying one or more
9		Classes as defined above;
10	b.	appoint Plaintiff as the representatives of the Classes and their counsel as Class counsel;
11	с.	award all actual, general, special, incidental, statutory, punitive, and consequential
12		damages and restitution to which Plaintiff and the Class Members are entitled under
13		Causes of Action 2 through 10, but award only restitution and injunctive relieve, pursuant
14		to California Civil Code § 1780, at this time;
15	d.	award pre-judgment and post-judgment interest on such monetary relief;
16	e.	grant appropriate injunctive and/or declaratory relief, including, without limitation, an
17		order that requires Defendant to repair, recall, and/or replace the Class vehicles and to
18		extend the applicable warranties to a reasonable period of time, or, at a minimum, to
19		provide Plaintiff and Class Members with appropriate curative notice regarding the
20		existence and cause of the Defect.
21	f.	award reasonable attorneys' fees and costs; and
22	g.	grant such further relief that this Court deems appropriate.
23		
24	Dated: June 1	10, 2019Respectfully submitted,
25		MCCUNE WRIGHT AREVALO LLP
26		By: /s/ David C. Wright
27		David C. Wright Richard D. McCune
28		Mark I. Richards
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	Class Action Case No.	Complaint

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1	SOHN & ASSOCIATES Douglas C. Sohn
2	Attorneys for Plaintiff and Putative Class
3	JURY DEMAND
4	Plaintiff, on behalf of himself and the putative Class, demand a trial by jury on all issues so
5	triable.
6	McCune Wright Arevalo LLP
7	By: /s/ David C. Wright
8	David C. Wright Richard D. McCune
9	Mark I. Richards
0	SOHN & ASSOCIATES
1	Douglas C. Sohn
2	Attorneys for Plaintiff and Putative Class
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