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12	IN THE UNITED C	TATES DISTRICT COURT
13		STATES DISTRICT COURT
14	FOR THE SOUTHER	N DISTRICT OF CALIFORNIA
15		G 37 140 07/4000 A ID 140/0
16	WILLIAM LESSIN, on behalf of himself and all others similarly situated,	Case No.: <u>'19CV1082 AJB WVG</u>
17	Plaintiff,	CLASS ACTION COMPLAINT
18	v.	1. Violation of the California Consumer Legal Remedies Act (Cal. Civ. Code §§ 1750, et seq.)
19	FORD MOTOR COMPANY, a Delaware corporation; and Does 1 through 10, inclusive,	 Violation of California Unfair Competition La
20	Defendants.	(Cal. Bus.& Prof. Code §§ 17200);
21	Defendants.	3. Violation of California's False Advertising Law (Cal. Bus. & Prof. Code §§ 17500, et seq.)
22		4. Breach of Express Warranty (Based on
23		California Law);
24		 Breach of Implied Warranty (California Commercial Code § 2314);
2526		6. Breach of Written Warranty Under the Magnuson-Moss Warranty Act (15 U.S.C.
27		§§ 2301, et seq.);
28		7. Fraudulent Concealment (Based on California Law)

		8. Breach of the Duty of Good Faith and Fair Dealing;
		9. Violation of the Song-Beverly Act – Breach of Implied Warranty (Cal. Civ. Code §§ 1792, 1791.1, et seq.)
		DEMAND FOR JURY TRIAL
_		
_	Class Action Complaint	-2-

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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 have experienced this spontaneous violent shaking while operating 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 has routinely refused to repair the Class Vehicles without charge when the defect manifests. Indeed, in many

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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
- 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.

- 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.

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window sticker did not state that the Vehicle suffered from any defects.

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A. Plaintiff William Lessin

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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

PARTIES

- 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 ¶ 26). On each occasion, Defendant has failed to provide an adequate remedy to the Death Wobble (defined *infra* at ¶¶ 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.

B. 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.
- 23. At all times relevant to this action, Ford manufactured, sold, and warranted the Class Vehicles throughout the United States. Ford and/or its agents, divisions, or subsidiaries designed, 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

A. 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." 1

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.

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

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- 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.
- 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.

1. NHTSA Consumer Complaints of Death Wobble Resulting in Crashes 1 2 The following are the consumer complaints submitted to NHTSA where the Death 33. Wobble defect caused an accident: 2 3 September 24, 2009 NHTSA ID NUMBER: 10285130 4 **Components: SUSPENSION** 5 NHTSA ID Number: 10285130 **Incident Date** September 23, 2009 6 Consumer Location CASTLEWOOD, VA 7 Vehicle Identification Number N/A **Summary of Complaint** 8 **CRASHYes FIRENo** 9 **INJURIES0** 10 **DEATHSO** FORD F-250 SUPERDUTY- WHILE DRIVING AT 55MPH OR HIGHER, AND YOU HIT A SMALL 11 POTHOLE OR DIP IN THE ROAD, THIS VEHICLE GOES INTO A VIOLENT SHIMMY. THE VEHICLE IS UNCONTROLLABLE AND EXTREMELY DANGEROUS. I WON'T LET ANY OF 12 MY FAMILY MEMBERS RIDE IN THE TRUCK WITH ME AND CRINGE AT THE THOUGHTS 13 OF HAVING TO DRIVE IT ON THE INTERSTATE! IT HAS SHAKEN ME OFF THE ROAD AND INTO THE DITCH OR MEDIAN SEVERAL TIMES. *TR 14 1 Affected Product 15 16 April 25, 2007 NHTSA ID NUMBER: 10188890 **Components: STEERING** 17 NHTSA ID Number: 10188890 18 **Incident Date** April 24, 2007 **Consumer Location EASTCHESTER, NY** 19 Vehicle Identification Number 1FTSW21565E**** **Summary of Complaint** 20 **CRASHYes** 21 **FIRENo INJURIES0** 22 **DEATHSO** SHORTLY AFTER I PURCHASED MY 2005 FORD F-250 SUPER DUTY PICKUP I 23 EXPERIENCED A VIOLENT VIBRATION IN THE STEERING, WHEN TRAVELING OVER 55 24 MPH, AFTER HITTING A SMALL BUMP IN THE ROAD. WHEN I BROUGHT MY TRUCK IN FOR SERVICE AND MENTIONED THIS EPISODE. THE SERVICE MANAGER ACTED AS 25 THOUGH IT WERE AN ANOMALY, MAYBE THE ROAD CONDITIONS OR SOMETHING ELSE. THIS DIDN'T SEEM TO BE THE TRUTH, SINCE IT HAPPENED SEVERAL TIMES SINCE 26 27 ² The foregoing complaints are reproduced as they appear on the NHTSA website. Any typographical errors are attributable to the original author of the complaint. Emphasis added to original text is denoted 28 by bold underlining. -12-Class Action Complaint

THEN. WHEN I BROUGHT IT TO THE ATTENTION OF THE LOCAL SERVICE MANAGER, HE 1 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 I WAS TRAVELING AT ABOUT 60 MILES AN HOUR ON THE HIGHWAY, WHEN I WENT 3 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 DAMAGE TO THE VEHICLE. I THANK GOD NO ONE WAS HURT, INCLUDING ME. I WAS 6 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 TRUCK. THE SERVICE MANAGER HAD BEEN REPLACED, WITH A NEW ONE. WHEN I 9 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 MANAGER SAYS HE HASN'T HEARD OF ANY PROBLEMS WITH THESE TRUCKS. I WAS 12 SEARCHING THE INTERNET AND FOUND MULTIPLE COMPLAINTS ON 13 DIFFERENT SITES, INCLUDING THE ONE THAT MADE REFERENCE TO YOUR SITE. THROUGH INSURANCE, I HOPE THAT THERE WOULD BE SOME TYPE OF LIABILITY TO 14 THE FORD MOTOR COMPANY. *JB **1 Affected Product** 15

17 | August 29, 2008 NHTSA ID NUMBER: 10240263

Components: STEERING, TIRES

18 **NHTSA ID Number:** 10240263 **Incident Date** August 27, 2008

Consumer Location PARKER, AZ

20 | Vehicle Identification Number 1FTSW21P85E****

Summary of Complaint

21 CRASHYes

22 FIRENo

INJURIES0

23 | **DEATHS0**

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

THE TIRES BLEW OUT. THE VEHICLE VEERED TO THE LEFT AND INTO ONCOMING TRAFFIC. THE CONTACT CRASHED INTO A MOUNTAIN AND THE VEHICLE ROLLED

OVER TWICE. THERE WERE NO INJURIES. A POLICE REPORT WAS FILED. THE CURRENT AND FAILURE MILEAGES WERE 65.197.

1 Affected Product

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August 21, 2008 NHTSA ID NUMBER: 10239123
 1
    Components: SUSPENSION
2
    NHTSA ID Number: 10239123
    Incident Date February 11, 2005
3
    Consumer Location PALMDALE, CA
4
    Vehicle Identification Number 1FTWW33P05E****
    Summary of Complaint
5
    CRASHYes
    FIRENo
6
    INJURIES0
7
    DEATHSO
    TO BRUCE YORK AND RICHARD BOYD I AM SO THANKFUL SOMEONE IS DOING
8
    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;
9
    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
    OF #@^%$. THIS TRUCK HAS BEEN NOTHING BUT A NIGHTMARE FOR OUR FAMILY. MY
11
    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
12
    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
    THE ROAD THEN THE STEERING WHEEL STARTS TO SHIMMY THEN BEGINS TO PULL
14
    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
15
    SECONDS. THE OSCILLATIONS ARE MORE THE 90 DEGREES FROM SIDE TO SIDE ON THE
16
    STEERING WHEEL. THESE OSCILLATIONS WILL CONTINUE FROM YOUR ORIGINAL
    DRIVING SPEED UNTIL THE TRUCK IS BROUGHT TO A COMPLETE STOP. THIS USUALLY
17
    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
18
    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
    MIDDLE OF A LOS ANGELES FREEWAY! WE ALSO HAVE COUNTLESS MEMORIES OF
20
    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
    NHTSA ID Number: 10284483
26
    Incident Date September 12, 2009
27
    Consumer Location DURANT, OK
    Vehicle Identification Number 1FTWW33P65E****
28
    Summary of Complaint
                                         -14-
```

Class Action Complaint

CRASHYes 1 **FIRENo** 2 **INJURIES0 DEATHSO** 3 I HAVE A FORD F350 HEAVY DUTY 1 TON, I HAD EXPERIENCED ON SEPARATE 4 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 5 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 6 ALSO HAD TAKEN MY TRUCK TO LOCAL DEALERSHIP TO CHECK FRONT SUSPENSION, 7 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 8 HAVING EMPLOYEE IN TRUCK (FRONT PASSENGER SEAT) MY TRUCK BEGAN TO VIOLENTLY SHAKE, THROWING MY TRUCK INTO A CONCRETE BRIDGE. I STEERED 9 TRUCK THE BEST I COULD CONSIDERING THE TRUCK WAS UNCONTROLLABLE. THE 10 REAR END OF THE TRUCK CLIMBED OVER THE BRIDGE THROWING THE TRUCK NEARLY ON ITS SIDE LANDING IN ONCOMING TRAFFIC FACING OPPOSITE DIRECTION 11 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 12 TREATED TO LOCAL HOSPITAL I NOW HAVE A HERNIA FROM THE IMPACT OF THE 13 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 14 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 15 INVESTIGATE FORD AGAIN. *TR 16 **1 Affected Product** 17 18 September 23, 2008 NHTSA ID NUMBER: 10243184 **Components: STEERING** 19

NHTSA ID Number: 10243184 20

Incident Date September 22, 2008

Consumer Location CINCINNATI, OH

- 21 Vehicle Identification Number 1FTSX21536E****
- **Summary of Complaint** 22
 - **CRASHYes**
- **FIRENo** 23
 - **INJURIES0**
- 24 **DEATHS0**
- TL*THE CONTACT OWNS A 2006 FORD F-250. WHILE DRIVING 63 MPH. THE VEHICLE 25 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 26
- CONTACT WANTS THE VEHICLE REPLACED. THE MANUFACTURER STATED THAT THEY 27
- WERE AWARE OF THE FAILURE; HOWEVER, ADVISED HIM TO FOLLOW THE TSB
- INSTRUCTION TO REPAIR THE FAILURE. THE FAILURE MILEAGE WAS 51,000 AND 28 CURRENT MILEAGE WAS 65,000.

-15-

Class Action Complaint

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

I WAS IN OAKLAND CALIFORNIA 1880 NORTH NUMBER FOUR LANE PULLING MY CAR 1 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 THIS VEHICLE ALIGNED WITH EACH TIRE CHANGE AND HAVE EXPERIMENTED WITH 6 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 RELIABILITY OF MY 30 YEAR OLD CHEVY HALF TON AND OVERLOADING IT BY UP TO 8 50% OUT OF FEAR FOR THIS TRUCK. BECAUSE OF SHEAR NUMBERS INVOLVED, NOTHING WILL EVER BE DONE BY THE NHTSA ABOUT THIS VEHICLE TYPE'S DEFECTS. 9

10 **1 Affected Product**

11 12

- July 1, 2014 NHTSA ID NUMBER: 10607347
- **Components: STEERING, SUSPENSION** 13
- 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**
- **FIRENo** 17
 - **INJURIES0**
- 18 **DEATHS0**
- ON MY DAILY COMMUTE TO WORK I EXPERIENCED WHAT I HAVE LATER RESEARCHED 19 TO FIND OUT IS CALLED THE "DEATH WOBBLE". THE FIRST OCCURRENCE HAPPENED
- 20 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
- CONTINUED AND ARRIVED SAFELY TO WORK AFTER REDUCING MY SPEED TO 45 MPH. I 23
 - 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
- MULTIPLE OCCASIONS, DIFFERENT LOCATIONS AND FOUND MYSELF EXPERIENCING IT 25 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 26
- HAVE THE REPAIR & DIAGNOSES. THE NEXT DAY 6/27/14 WE HAD TO EVACUATE OUR
- 27 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

-17-

Class Action Complaint

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SMALL TREE BECAUSE OF THE VIOLENT SHAKING AND NECESSARY BRAKING TO
 1
    REGAIN CONTROL. I WAS ABLE TO ESCAPE WITH MINOR DAMAGES TO MY FRONT
2
    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
3
    THAT I CANNOT AFFORD TO FIX. I'M AFRAID THIS COULD RESULT IN A SERIOUS
4
    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
5
    FULLY RESPONSIBLE. THERE ARE HUNDREDS OF SIMILAR CASES FROM OLDER
    MODELS AND EVEN NEWER UP TO 2013, MINE IS A F-250 2008.
6
    HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER-
7
    DUTY/TOHP1M75VBFBFT9IL/P5. *TR
    1 Affected Product
8
9
    August 28, 2013 NHTSA ID NUMBER: 10537757
10
    Components: SUSPENSION
    NHTSA ID Number: 10537757
11
    Incident Date March 2, 2010
12
    Consumer Location LUFKIN, TX
    Vehicle Identification Number 1FT7W2B67BE****
13
    Summary of Complaint
    CRASHYes
14
    FIRENo
15
    INJURIES1
    DEATHS0
16
    2011 F -250 SD4X4 HAD 08 KING RANCH NEVER A PROB IN 87K MILES.THE 11 IS
    DANGEROUS!!!!!!!! THIS TRUCK WILL BE DOING FINE ON THE ROAD, HIT A BUMP OR
17
    ROUGH SPOT IN THE ROAD AND TRUCK GOES INTO (DEATH WOBBLE MODE) THE
18
    WHOLE TRUCK STARTS BOUNCING AND SHAKING AND VILOENTLY WOBBLING. HAVE
    HAD IT BACK TO FORD STORE 4 TIMES. THEY REPLACED STEERING STABLIZER SHOCKS
19
    AND BALL JOINTS AT MY EXPENSE DUH!!! FIRST 3 TIMES THEY COULDN'T FIND
    ANYTHING WRONG, IT KEPT DOIN IT . I TOOK IT BACK AND THEY DID THE REPAIRS I
20
    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 FIELD..HAVE TERRIBLE CUT ON LEGS AND FACE....FILED LAWSUIT
22
    YESTERDAY..WILL KEEP YOU POSTED...FORD 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
    NHTSA ID Number: 11170696
27
    Incident Date January 14, 2019
    Consumer Location BURLINGTON, WV
28
    Vehicle Identification Number 1FT8W3DT4HE****
                                          -18-
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Class Action Complaint

Summary of Complaint 1 **CRASHYes** 2 **FIRENo INJURIES0** 3 **DEATHS0** 4 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 5 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 6 TRUCK VIOLENT SHAKE HAVE TO STOP TO GET IT TO STOP. NOW SINCE TIRE PRESSURE 7 CAN BE MAINTAINED SINCE VALOVE STEMS FIXED. THEY TELL ME FRONT TIRES NEED REPLACED FROM NOT MAINTAINING TIRE PRESSURES. THAT IS WHY TRUCK SHAKES. 8 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 9 SHAKES SO BAD, I HAVE RAN OFF 7 TIMES, RAN TWO OTHER CARS OFF ROAD, AND 10 PULLED OVER FOR SUSPECTED DUI TOLD OFFICER WHAT HAPPENED AND IF I DIDN'T GET IT FIXED HE WRITE ME TICKET DEFECTIVE EQUIPMENT AND DEEM VEHICLE 11 UNSAFE TO OPERATE. ALWAYS IN MOTION, ANY SPEED, ANY RUFF ROAD, EVEN GOING ACROSS BRIGGS ANYTHING THAT IS NOT PERFECT SMOOTH ROAD 12 1 Affected Product 13 14 NHTSA Consumer Complaints of Death Wobble Causing Loss of Control of Vehicle 2. 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: 17 February 11, 2009 NHTSA ID NUMBER: 10258400 18 **Components: SUSPENSION** NHTSA ID Number: 10258400 19 **Incident Date** February 10, 2009 **Consumer Location** Unknown 20 Vehicle Identification Number N/A 21 **Summary of Complaint CRASHNo** 22 **FIRENo INJURIES0** 23 **DEATHS0** 24 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 25 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 26 PROBLEM SINCE I BOUGHT THE TRUCK NEW IN 2005 BUT IT HAS NEVER BEEN THIS BAD. 27 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 28 1 Affected Product

-19-

Class Action Complaint

```
1
2
    April 4, 2009 NHTSA ID NUMBER: 10264111
    Components: STEERING, SUSPENSION
3
    NHTSA ID Number: 10264111
4
    Incident Date April 1, 2009
    Consumer Location PUYALLUP, WA
5
    Vehicle Identification Number 1FTSW21P05E****
    Summary of Complaint
6
    CRASHNo
7
    FIRENo
    INJURIES0
8
    DEATHS0
9
    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
    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
13
    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
    NHTSA ID Number: 10300354
18
    Incident Date January 19, 2010
    Consumer Location PLANT CITY, FL
19
    Vehicle Identification Number N/A
20
    Summary of Complaint
    CRASHNo
21
    FIRENo
    INJURIES1
22
    DEATHS0
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-
    Class Action Complaint
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Incident Date July 15, 2007 1 Consumer Location ATLANTIC BEACH, FL 2 Vehicle Identification Number 1FTSW21575E**** **Summary of Complaint** 3 **CRASHNo** 4 **FIRENo INJURIES0** 5 **DEATHS0** TL*THE CONTACT OWNS A 2005 FORD F-250 SUPERDUTY. WHILE DRIVING 6 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 VEHICLE SWAYED TO THE SHOULDER OF THE HIGHWAY. THERE WERE NO WARNINGS 8 PRIOR TO THE FAILURE. THE VEHICLE WAS NOT TAKEN TO A MECHANIC FOR THIS FAILURE AND WAS ABLE TO BE DRIVEN. THE FAILURE OCCURRED TWO ADDITIONAL 9 TIMES. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THEY 10 PERFORMED A SAFETY INSPECTION. THE TECHNICIAN STATED THAT THERE WERE NO MALFUNCTIONS WITH THE VEHICLE. THE FAILURE MILEAGE WAS 42,000 AND CURRENT 11 MILEAGE WAS 51,000. UPDATED 07/29/08 *BF UPDATED 07/29/08 1 Affected Product 12 1 Associated Document 13 14 June 13, 2009 NHTSA ID NUMBER: 10273718 15 Components: SUSPENSION, STEERING NHTSA ID Number: 10273718 16 **Incident Date June 13, 2009** Consumer Location WEST PITTSTON, PA 17 Vehicle Identification Number 1FTNF21535E**** 18 **Summary of Complaint CRASHNo** 19 **FIRENo** 20 **INJURIES0 DEATHSO** 21 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 HIGHWAY. I WAS ALMOST HIT BY THE VEHICLE DIRECTLY BEHIND ME. THIS IS THE 23 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 STATION AND THEY REPLACED THE STEERING STABILIZER AND DID AN ALIGNMENT. 25 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 26 ANY FORD TRUCK. OBVIOUSLY, THEY ARE AWARE OF THE PROBLEM. I ONLY HOPE 27 THERE IS A RECALL BEFORE TOO MANY PEOPLE DIE. *TR 1 Affected Product 28

-21-

```
1
    August 21, 2008 NHTSA ID NUMBER: 10239123
2
    Components: SUSPENSION
    NHTSA ID Number: 10239123
3
    Incident Date February 11, 2005
4
    Consumer Location PALMDALE, CA
    Vehicle Identification Number 1FTWW33P05E****
5
    Summary of Complaint
    CRASHYes
6
    FIRENo
7
    INJURIES0
    DEATHS0
8
    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
9
    STEERING PROBLEM FAR EXCEEDS ANYTHING FORD IS WILLING TO ADMIT. MY CASE;
10
    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 #!*% 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
13
    NEARLY EVERY TIME EITHER ONE OF US HAS DRIVEN IT. TYPICAL SITUATION, WE ARE
    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
16
    SECONDS. THE OSCILLATIONS ARE MORE THE 90 DEGREES FROM SIDE TO SIDE ON THE
    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
19
    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
20
    MIDDLE OF A LOS ANGELES FREEWAY! WE ALSO HAVE COUNTLESS MEMORIES OF
21
    SLIDING TO A STOP IN THE RHUBARB, DUST FLYING, OFF THE EDGE OF THE FREEWAY.
    ALL WHILE CALLING FORD AND BEGGING THEM TO FIX IT! WE HAD THIS TRUCK IN
22
    THE DEALER MANY TIMES TO HAVE IT REPAIRED. *TR
    1 Affected Product
23
24
    June 22, 2009 NHTSA ID NUMBER: 10274673
25
    Components: SUSPENSION
    NHTSA ID Number: 10274673
26
    Incident Date June 20, 2009
27
    Consumer Location FAYETTEVILLE, GA
    Vehicle Identification Number 1FTWW33P75E****
28
    Summary of Complaint
                                         -22-
```

Class Action Complaint

1 | CRASHNo

FIRENo

2

3

5

6

7

8

10

11

13

14

16

19

27

28

INJURIES0

| DEATHS0

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 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

THE VEHICLE TO THE LEFT OR RIGHT SUCH AS GOING AROUND A CURVE, THE FRONT

WHEELS HAVE STARTED TO VIOLENTLY SHIMMY OR OSCILLATE CAUSING THE

STEERING WHEEL TO VIOLENTLY SHIMMY BACK AND FORTH. THIS USUALLY OCCURS

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

9 FORTUNATELY THERE WHERE NO ONCOMING VEHICLES AT THAT MOMENT. I HAD TO

SLOW DOWN TO ABOUT 25-30 MPH AND MOVE TO THE SHOULDER OF THE ROAD TO GAIN CONTROL OF THE VEHICLE. THIS IS A SERIOUS PROBLEM WITH THIS VEHICLE

ESPECIALLY IN HEAVY TRAFFIC OR ON TWO LANE MOUNTAIN ROADS. I ORIGINALLY

COMPLAINED ABOUT THIS AFTER I PURCHASED THE VEHICLE IN FEBRUARY 2005, AND WAS TOLD THE TRUCK WAS WITHIN SPECS AND THERE WAS NOTHING TO BE DONE. I

12 WAS TOLD THE TRUCK WAS WITHIN SPECS AND THERE WAS NOTHING TO BE DONE. I 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

WHEEL SHIMMY OR OSCILLATION. I BELIEVE THERE ARE OTHER TRUCKS THAT HAVE

THE SAME PROBLEM. *TR

15 | 1 Affected Product

17 | February 8, 2016 NHTSA ID NUMBER: 10824888

Components: STEERING, SUSPENSION, UNKNOWN OR OTHER

18 | NHTSA ID Number: 10824888

Incident Date November 25, 2015

Consumer Location SANDY, OR

20 | Vehicle Identification Number 1FTWW31P85E****

Summary of Complaint

21 CRASHNo

22 FIRENo

| INJURIESO

23 || **DEATHS0**

I WAS DRIVING ON A TWO LANE BACK ROAD AROUND 45 TO 50 MPH, AND MY TRUCK STARTED VIOLENTLY SHAKING AND I LOST ALL CONTROL OF STEERING. I WENT INTO

THE ONCOMING LANE, LUCKILY NO ONE WAS COMING, AND HAD TO HIT MY BRAKES

25 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

DEATH WOBBLE. THE WOBBLE WAS SO BAD THAT IT LOOSENED THE TRACK BAR AND

THE BOLT HOLDING THE POWER STEERING HARD LINE. I LOST ALL POWER STEERING

FLUID WITHIN SECONDS. I HAVE RESEARCHED IT, TRIED REPLACING SEVERAL PARTS, LIKE TIE-RODS, AND IT HAS LESSENED A LITTLE BIT, BUT IF I HIT A BUMPY ROAD OR

-23-

Class Action Complaint

EVEN JUST A PATCH OF NEW PAVEMENT, IT STARTS SHAKING. I HAVE READ A LOT OF 1 OTHER FORD OWNERS ARE EXPERIENCING THIS SAME ISSUE WITH THEIR TRUCKS. 2 1 Affected Product 3 4 January 5, 2007 NHTSA ID NUMBER: 10177891 **Components: STEERING** 5 NHTSA ID Number: 10177891 **Incident Date** January 4, 2007 6 Consumer Location GLEN BURNIE, MD 7 Vehicle Identification Number 1FTWW33P15E**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHSO** TL* - WHEN CONTACTWAS DRIVING AND GOING OVER A SERIES OF SMALL BUMPS 11 LOST CONTROL OF THE STEERING WHEEL WHICH WENT FROM RIGHT TO LEFT 12 QUICKLY TO THE POINT OF BEING ALMOST UNCONTROLLABLE. IN ORDER FOR CONTACT TO GET CONTROL OF THE STEERING WHEEL SHE HAD TO SLOW THE VEHICLE 13 DOWN TO A SPEED OF 5 MPH OR COME TO A COMPLETE STOP. THE CONTACT TOOK THE VEHICLE TO THE DEALERSHIP ,AND THEY STATED THAT THEY NOTICED THE SAME 14 INCIDENT AS WELL ON A TEST DRIVE OF THE VEHICLE, BUT THEY COULD NOT DO 15 ANYTHING ABOUT THE INCIDENT BECAUSE THE MANUFACTURER HASN'T GIVING THE DEALERSHIP ANY ADVISE ON HOW TO FIX THE FAILURE.*AK 16 **1 Affected Product** 17 18 January 23, 2008 NHTSA ID NUMBER: 10215739 Components: STEERING, ELECTRICAL SYSTEM 19 NHTSA ID Number: 10215739 **Incident Date** January 17, 2008 20 **Consumer Location** Unknown 21 Vehicle Identification Number 1FTWX31525E**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** TL*THE CONTACT OWNS A 2005 FORD F-350 SD. WHILE DRIVING 65 MPH, THE CONTACT 25 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, THE STEERING WORSENS. HE HAS TAKEN THE VEHICLE TO THE DEALER FOUR TIMES 27 AND WAS INFORMED THAT THE TIRES NEEDED TO BE ROTATED. THE BUSHING NEEDED TO BE CHANGED, AND THE TIRE PRESSURE WAS INCORRECT. THE PURCHASE DATE 28

-24-

WAS UNKNOWN. THE CURRENT MILEAGE WAS 36,674 AND FAILURE MILEAGE WAS 1 10,000. THE ENGINE LIGHT ILLUMINATED. UPDATED 02-12-08 *BF 2 **1 Affected Product** 1 Associated Document 3 4 September 5, 2008 NHTSA ID NUMBER: 10241025 5 **Components: STEERING** NHTSA ID Number: 10241025 6 **Incident Date** April 19, 2008 7 Consumer Location ALGONQUIN, IL Vehicle Identification Number 1FTWW31PX5E**** 8 **Summary of Complaint CRASHNo** 9 **FIRENo** 10 **INJURIES0 DEATHS0** 11 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 DRIVING 65 MPH, HE WAS INCAPABLE OF CONTROLLING THE STEERING. IT WOULD 13 MOVE FROM LEFT TO RIGHT AND HE UNSUCCESSFULLY COMPENSATED FOR THE FAILURE. THE VEHICLE WAS TAKEN TO THE DEALER TWICE, BUT THEY COULD NOT 14 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 **Components: STEERING** 19 NHTSA ID Number: 10415452 **Incident Date** July 2, 2011 20 **Consumer Location LOS GATOS, CA** 21 Vehicle Identification Number 1FTWW31P25E**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** ON JULY 2, 2011, I WAS DRIVING MY 2005 F350 4X4 FORD TRUCK AT APPROXIMATELY 60 25 MPH ON A DOWNHILL GRADE AND HIT A POTHOLE IN THE ROAD. THE TRUCK STARTED 26 SHAKING SO VIOLENTLY THAT I LOST CONTROL AND DRIFTED INTO THE ONCOMING TRAFFIC LANE FOR SEVERAL SECONDS WITHOUT BEING ABLE TO CONTROL THE

-25-

VISION WHILE TRYING TO HOLD ON AND REGAIN CONTROL. THE SHAKING LASTED 10-

VEHICLE. FORTUNATELY IT WAS LATE AT NIGHT AND NO OTHER VEHICLES WERE APPROACHING. THE STEERING WHEEL SHOOK SO VIOLENTLY THAT IT BLURRED MY

Class Action Complaint

Case No.

27

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 **1 Affected Product**

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November 15, 2008 NHTSA ID NUMBER: 10248890

Components: SUSPENSION, EQUIPMENT

NHTSA ID Number: 10248890

Incident Date July 4, 2005

12 Consumer Location EL CAJON, CA

Vehicle Identification Number 1FTWW33P45E****

13 **Summary of Complaint**

CRASHNo 14

FIRENo

15 **INJURIES0**

DEATHS0

16 ON JULY 4, 2005, I PURCHASED A 2005 FORD F350 SUPER DUTY LARIAT WITH LONG BED 17

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 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

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

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 23 STOPPED. I REMOVED THE CAMPER ABOUT A YEAR AGO AND THE PROBLEM WITH THE

24 TRUCK IS WORSE. IT NOW WILL VIBRATE UNCONTROLLABLY AT 40-50 MPH. I

REPORTED THIS VIBRATION PROBLEM EVERY TIME I WENT TO THE DEALER FOR 25

SERVICE. THEY ALWAYS SAID THEY DID ALL THEY COULD WITH THE DAMPENER. I TOOK THE TRUCK TO EL CAJON FORD ABOUT 3-4 WEEKS AGO. NOW THAT IT IS OUT OF 26

WARRANTY, FORD NOW SAYS IT CAN FIX THE PROBLEM, BUT IT HAS DAMAGE THE

FRONT STEERING MECHANISM. THE SERVICE WRITER SAID IN A VOICE MAIL THAT

DOWNEY PUT ON A DAMPER THAT WAS TOO SMALL FOR MY TRUCK.

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-26-

I DEMANDED THEY FIX IT FREE AND THEY REFUSE. I WANT MY TRUCK FIXED. THIS IS 1 A DESIGN DEFECT, SINCE IT HAS EXISTED FROM DAY 1. I HAVE READ ON SEVERAL 2 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 3 EXISTS WHEN YOUR TRUCK IS VIBRATING AND BOUNCING ACROSS LANES AND YOU 4 CANNOT STEP ON THE BRAKE OR MAKE IT WORSE! THANK YOU, ANNETTE GILLIAM *TR 5 **2 Affected Products** 6 7 September 4, 2016 NHTSA ID NUMBER: 10903511 Components: STEERING, WHEELS, SUSPENSION 8 NHTSA ID Number: 10903511 9 **Incident Date July 14, 2015** Consumer Location CHESTER, NH 10 Vehicle Identification Number 1FTWW31595E**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** DEATH WOBBLE. 1ST TIME IT HAPPENED WAS ENTERING THE HIGHWAY OFF THE RAMP 14 AND ACCELERATING TO MERGE INTO TRAFFIC AND GOING OVER THE OVERPASS THE 15 BRIDGES IN MASS. ARE A MESS, ANY WAY, WHEN I DROVE THOSE SERIES OF BUMPS AT ABOUT 60-65 MPH IN A TRUCK IT GETS BUMPY ANYWAY BUT ALL OF A SUDDEN THE 16 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 17 STEERING THE TRUCK..INSTINCTIVELY I APPLIED THE BRAKES NOT EVEN CHECKING 18 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 19 VISION AND EVERYTHING GOES BLURRY BECAUSE YOUR SHAKING IN THE VEHICLE SO BAD. A OUICK GOOGLE AND YOU FIND THIS HAPPENS TO MANY MANY OWNERS OF 20 THIS VERY THE SAME TRUCK. IN FACT FORD SENT ME A LETTER STATING THEY KNEW 21 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 22 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 23 SLOWER SPEEDS. THIS IS AN EXTREMELY DANGEROUS DEFECT. 24 **1 Affected Product** 25 26 July 24, 2008 NHTSA ID NUMBER: 10235638 Components: SUSPENSION, STEERING 27

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Class Action Complaint

NHTSA ID Number: 10235638 **Incident Date June 18, 2008**

Consumer Location BLOWING ROCK, NC

Case No.

Vehicle Identification Number 1FTSX21586E**** 1 **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** 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 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 OUITE A COMMON PROBLEM AND MANY MANY FORD TRUCK OWNERS ARE CURIOUS AS TO WHY NOTHING HAS BEEN DONE. AFTER CLEARLY 9 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 THIS PROBLEM AND REVEAL TO ME THAT FORD TOLD THEM TO CHANGE THE AIR 11 PRESSURE IN THESE TRUCKS. THIS DOES NOT CORRECT THIS DANGEROUS AND POTENTIALLY LIFE THREATENING PROBLEM! THESE TRUCKS NEED TO BE RECALLED 12 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 LETTER STATING THAT MY FORD TRUCK WOULD BE SAFE AND THAT THEY WOULD BE 14 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 15 **1 Affected Product** 16 17 August 22, 2008 NHTSA ID NUMBER: 10239261 18 Components: SUSPENSION, STEERING NHTSA ID Number: 10239261 19 **Incident Date** May 15, 2008 **Consumer Location CARY, NC** 20 Vehicle Identification Number 1FTSW21P66E**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo INJURIES0** 23 **DEATHSO** 24 VIOLENT SHAKING IN FRONT SUSPENSION AND WHEELS AFTER HITTING ROUGH PAVEMENT AT APPROX 65 MPH. TRUCK ALWAYS HAS EXCESSIVE WHEEL HOP BUT 25 EXTREME SHAKING HAS OCCURRED 5 TIMES IN 66K MILES. FORD TECHNICAL BULLETIN USELESS FOR RESOLVING PROBLEM. DEALER SUGGESTED CHECK TIRE 26 INFLATION, TOW SETTINGS, AND STEERING COMPONENTS, NO RESULTS, THIS IS A 27 DEATH TRAP. IT SHOOK TWO DRINKS OUT OF THE CUPHOLDER. LOST STEERING ABILITY, CROSSED LANES AND STOPPED SHAKING ONLY AFTER COMING TO A 28 COMPLETE STOP. *TR

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1 Affected Product 1 2 September 3, 2010 NHTSA ID NUMBER: 10353642 3 Components: SUSPENSION, STEERING 4 **NHTSA ID Number:** 10353642 **Incident Date** September 2, 2010 5 Consumer Location ROCHESTER, NY Vehicle Identification Number N/A 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** FORD 2006 F250 DEATH WOBBLE. I WAS DRIVING MY TRUCK TODAY AND I HIT A LITTLE 10 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 11 DEAD. SCARIEST THING EVER. FORD NEEDS TO RECALL THIS ISSUE BEFORE IT KILLS 12 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 RIGHT THING AND RECALLS THIS ISSUE. *TR 14 1 Affected Product 15 16 September 18, 2013 NHTSA ID NUMBER: 10544242 17 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 10544242 18 **Incident Date** September 3, 2013 **Consumer Location** Unknown 19 Vehicle Identification Number 1FTSW21556E**** 20 **Summary of Complaint CRASHYes** 21 **FIRENo INJURIES4** 22 **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 POSTED SPEED OF 70 MPH. I HAD JUST PASSED A VEHICLE THAT WAS IN THE RIGHT 25 LANE. JUST AFTER PASSING THIS VEHICLE I DEVELOPED THIS DEATH WOBBLE, I WAS 26 SWITCHING LANES BACK TO THE RIGHT LANE WHEN MY STEERING WHEEL STARTED TO SHAKE, NOT JUST A LITTLE SHACKING EITHER. I HAD APPLIED MY BRAKES AND 27 HELD THE WHEEL WITH BOTH MY HANDS. MY STEERING WHEEL WAS SHACKING SO BADLY THAT MY DASHBOARD WAS FALLING APART, AND I WAS HAVING MAJOR 28 PROBLEMS CONTROLLING MY VEHICLE. IT FELT AS IF MY DRIVER?S WHEEL WAS -29-

BOUNCING UP AND DOWN AND MY STEERING WHEEL WAS ALSO SHAKING SO BADLY 1 THAT IN JUST A SECOND I HAD LOST TOTAL CONTROL OF MY VEHICLE. MY TRUCK 2 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 3 HALF TIMES BEFORE COMING TO A STOP UPSIDE DOWN. THE CAB OF THE TRUCK WAS 4 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 5 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 6 THAT MY 3 CHILDREN AND I LIVED THROUGH THIS NIGHT MARE. I HAVE DRIVEN A 7 PICKUP TRUCK FOR OVER 20 YRS., AND I HAVE NEVER FELT THIS DEATH WOBBLE BEFORE. 8 1 Affected Product 9 10 February 20, 2014 NHTSA ID NUMBER: 10565061 Components: WHEELS, SUSPENSION, STEERING 11 NHTSA ID Number: 10565061 12 **Incident Date** February 19, 2014

Consumer Location JOHNS CREEK, GA

Vehicle Identification Number N/A

Summary of Complaint 14

CRASHNo 15 **FIRENo**

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INJURIES0

16 **DEATHS0**

WHILE DRIVING MY 2006 FORD F250 FX4, AT SPEEDS BETWEEN 45-65 MPH, A SLIGHT 17 VIBRATION IS FELT. WITHIN A FEW SECONDS IT TURN INTO A VIOLENT SHAKING

MOTION AS IF I'M DRIVING ON LARGE COBBLE STONES. IT HAS BEEN SO BAD I HAVE

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

WHEEL JERKS VIOLENTLY. FORD HAS SENT A LETTER OUT THAT SAY INFLATE YOUR 20 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

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

TIRES ARE STOCK, ROTATED, BALANCED, AND ALIGNED, THIS HAPPENS AT LEAST 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

1 Affected Product

September 23, 2008 NHTSA ID NUMBER: 10243184

Components: STEERING NHTSA ID Number: 10243184 **Incident Date** September 22, 2008

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Class Action Complaint

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Consumer Location CINCINNATI, OH
 1
    Vehicle Identification Number 1FTSX21536E****
2
    Summary of Complaint
    CRASHYes
3
    FIRENo
4
    INJURIES0
    DEATHSO
5
    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
6
    THE CONTACT LOST CONTROL. THE VEHICLE WILL NOT BE REPAIRED BECAUSE THE
7
    CONTACT WANTS THE VEHICLE REPLACED. THE MANUFACTURER STATED THAT THEY
    WERE AWARE OF THE FAILURE; HOWEVER, ADVISED HIM TO FOLLOW THE TSB
8
    INSTRUCTION TO REPAIR THE FAILURE. THE FAILURE MILEAGE WAS 51,000 AND
    CURRENT MILEAGE WAS 65,000.
9
    1 Affected Product
10
11
    April 10, 2009 NHTSA ID NUMBER: 10264951
12
    Components: STEERING
    NHTSA ID Number: 10264951
13
    Incident Date December 18, 2005
    Consumer Location COTTONWOOD, AZ
14
    Vehicle Identification Number 1FTSW21Y56E****
15
    Summary of Complaint
    CRASHNo
16
    FIRENo
    INJURIES0
17
    DEATHSO
18
    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
19
    ROAD THERE WAS HUGE VIBRATIONS IN THE REAR END AND VERY NEAR LOSING
    CONTROL. RECENTLY I WAS TRAVELING ON A MAJOR INTERSTATE AT
20
    APPROXIMATELY 80 MPH AND ALL OF A SUDDEN THE FRONT END FELT LIKE BOTH
21
    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
22
    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
23
    DEALER TODAY AND HE SAID SOUNDS LIKE SOMETHING TERRIBLE IS WRONG, WE'LL
24
    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
25
    1 Affected Product
26
27
    October 1, 2007 NHTSA ID NUMBER: 10204597
    Components: STEERING, SUSPENSION
28
    NHTSA ID Number: 10204597
                                         -31-
    Class Action Complaint
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Incident Date September 16, 2007
 1
    Consumer Location HAMPDEN, MA
 2
    Vehicle Identification Number 1FTSW21516E****
    Summary of Complaint
 3
    CRASHNo
 4
    FIRENo
    INJURIES0
 5
    DEATHS0
    MY 2006, 5.3 GAS ENGINE, 4 WHEEL DRIVE, F250 SUPER DUTY HAS HAD EXCESSIVE
 6
    WHEEL HOP, BOUNCING, VIBRATION, AND SOMETIMES, VIOLENT SHAKING OF THE
 7
    WHOLE FRONT OF THE TRUCK, WHEN GOING OVER EXPANSION JOINTS, BUMPS AND
    ROAD DEFECTS SINCE IT WAS NEARLY NEW. THIS RESULTS IN THE STEERING WHEEL
 8
    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
 9
    SHUDDERED, WHEN GOING OVER A BUMP AT SPEEDS OVER 50. THAT IS, IT DID NOT
10
    JUST GIVE ONE HARD JOLT, BUT BOUNCED A FEW TIMES. THE BOUNCING GOT WORSE
    AS MILEAGE ON THE VEHICLE WENT UP. SOMETIMES THE TRUCK WOULD MOVE
11
    LATERALLY AFTER A HARD BUMP, THAT IS, MOVE TO THE EDGE OF THE TRAVELED
    LANE, OR PARTIALLY INTO ONE OF THE ADJACENT LANES. NOW, WITHIN THE LAST 2
12
    WEEKS, AT ITS EXTREME OF VIBRATIONS AND BOUNCING, THE VIOLENT SHAKING HAS
13
    HAPPENED TO ME TWICE, BOTH TIMES WHEN TRAVELING ON A HIGHWAY AT 60-68
    MPH, AFTER GOING OVER AN EXPANSION JOINT COMING OFF OR GOING ON TO A
14
    BRIDGE. FIRST TIME, ON SEPT 16, 2007, WITH ABOUT 9000 MILES ON THE F250, SHAKING
    LASTED ABOUT 5 SECONDS, ON I64 IN VIRGINIA BEACH, VA, AND THEN, ON SEPT. 28,
15
    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
    CONTROL OF THE VEHICLE AND HAVE EITHER INJURED SOMEONE ELSE OR MYSELF.
17
    BOTH OF THE SERIOUS VIOLENT SHAKING EPISODES HAPPENED ON A DRY INTERSTATE
    HIGHWAY IN DECENT CONDITION WITH OTHER TRAFFIC TRAVELING AT THE SAME
18
    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
    WHEN I GOT THE TRUCK ON JAN. 31, 2007. THERE ARE NO OBVIOUS DEFECTS IN THE
20
    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
    COULD RESULT IN THE LOSS OF LIFE. *JB
23
    1 Affected Product
24
25
    November 5, 2007 NHTSA ID NUMBER: 10208006
    Components: SUSPENSION
26
    NHTSA ID Number: 10208006
27
    Incident Date November 5, 2007
    Consumer Location PATASKALA. OH
28
    Vehicle Identification Number N/A
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Class Action Complaint

Summary of Complaint 1 **CRASHNo** 2 **FIRENo INJURIES0** 3 **DEATHSO** 4 WHILE DRIVING HOME FROM WORK, I HIT A SMALL BUMP IN THE FREEWAY AT 65MPH AND NEARLY LOST CONTROL OF MY 2006 F-250. THE VEHICLE BEGAN TO SHAKE 5 UNCONTROLLABLY AND VIOLENTLY. I TRIED TO REGAIN CONTROL OF MY DIRECTION WHICH ONLY HAPPENED AFTER I GOT BELOW 15 MPH. AFTER PULLING OFF THE 6 HIGHWAY, I GOT OUT TO CHECK WHICH TIRE HAD BLOWN AND TO MY SURPRISE ALL 7 WERE FINE. IF I HADN'T HAVE BEEN IN THE FAR RIGHT HAND LANE OF THE FREEWAY, I WOULD HAVE CAUSED AN ACCIDENT AND HURT EITHER MYSELF OR SOMEONE ELSE. 8 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 9 SERIOUS AND DANGEROUS ISSUE FOR F-250 OWNERS AND ALL WHO TRAVEL AROUND 10 THEM. FORD NEEDS TO RE-CALL THESE FRONT END DEFECTS BEFORE SOMEONE GETS KILLED, AFTER A THOROUGH SEARCH OF THE INTERNET, I DISCOVERED A MOUNTAIN 11 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 13 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 14 1 Affected Product 15 16 April 16, 2008 NHTSA ID NUMBER: 10224740 **Components: SUSPENSION** 17 NHTSA ID Number: 10224740 18 **Incident Date** March 1, 2008 Consumer Location BROWN CITY, MI 19 Vehicle Identification Number 1FTSW21P26E**** **Summary of Complaint** 20 **CRASHNo** 21 **FIRENo INJURIES0** 22 **DEATHSO** ON MY 2006 FORD F250 SD DIESEL I EXPERIENCE VIOLENT OSCILLATIONS OF THE 23 STEERING WHEEL WHEN GOING OVER RR TRACKS OR BUMPS IN THE ROAD, LEADING 24 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 25 RELATED TO LOW TIRE PRESSURE, BUT MY TIRE PRESSURE WAS AT THE MFG RECOMMENDATION. I HAVE READ NUMEROUS REPORTS THAT A STEERING DAMPENER 26 IS REOUIRED AND NOT INSTALLED ON THE FORD SD TRUCKS. *TR 27 1 Affected Product 28

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December 31, 2008 NHTSA ID NUMBER: 10253393 1 **Components: SUSPENSION** 2 NHTSA ID Number: 10253393 **Incident Date** September 20, 2007 3 Consumer Location LAUREL, MD 4 Vehicle Identification Number 1FTSX215X6E**** **Summary of Complaint** 5 **CRASHNo FIRENo** 6 **INJURIES0** 7 **DEATHSO** THIS IS A SUSPENSION PROBLEM THAT I NOTICED ABOUT 9 MONTHS AFTER I BOUGHT 8 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 9 GOTTEN PROGRESSIVELY WORSE. I WAS DRIVING AT 60 MPH AND WENT OVER A 10 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 11 HOLDING THE WHEEL FIRMLY I WOULD HAVE CROSSED THE DOUBLE YELLOW LINE INTO ONCOMING TRAFFIC. I FOUND A SITE WHERE THERE WERE 11 OTHER 12 COMPLAINTS ON THIS SAME VEH. AND THE SAME PROBLEM. I HAVE OWNED F250'S 13 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 14 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 15 IT TO A FORD DEALER TO LOOK AT, BUT FROM WHAT I READ OF THE OTHER 16 COMPLAINTS SOME PEOPLE HAVE BEEN IN 3-4 TIMES AND STILL HAVE THE SAME PROBLEM. *TR 17 1 Affected Product 18 19 March 2, 2009 NHTSA ID NUMBER: 10260393 **Components: SUSPENSION** 20 **NHTSA ID Number:** 10260393 21 **Incident Date** October 10, 2008 Consumer Location BELLEVUE, WA 22 Vehicle Identification Number 1FTSX21PX6E**** **Summary of Complaint** 23 **CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** TRAVELING APPROXIMATELY 60MPH ON INTERSTATE HIGHWAY ON SOMEWHAT 26 UNDULATING CONCRETE SURFACE, VEHICLE EXPERIENCED EXTREME VIBRATING OF 27 SUSPENSION SUCH THAT IT FELT LIKE THE AXLES WERE UNCONNECTED FROM THE VEHICLE FRAME. STEERING CONTROL BECAME DIFFICULT AND NEARLY LOST 28 CONTROL. *TR -34-

Class Action Complaint

1 Affected Product 1 2 April 21, 2009 NHTSA ID NUMBER: 10266214 3 **Components: STEERING, SUSPENSION** 4 NHTSA ID Number: 10266214 Incident Date November 20, 2008 5 Consumer Location SACRAMENTO, CA Vehicle Identification Number 1FTSX21Y76E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 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 BUMP OR DIP IN THE ROAD. THIS HAS HAPPENED TO ME. AT THE TIME I HAD NO IDEA 11 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 SEVERE SHIMMY. I ALMOST LOST FULL CONTROL OF THE TRUCK. HAD THERE BEEN A 13 VEHICLE NEXT TO ME IN THE LEFT LANE I WOULD NOT HAVE BEEN ABLE TO AVOID HITTING IT. I DON'T KNOW WHAT THE PSI OF AIR IN MY TIRES WERE AT THE TIME. 14 THEY WERE THE STOCK TIRES THAT CAME WITH THE TRUCK OFF THE LOT. I HAVE 15 SINCE CHANGED THESE TIRES DUE TO WEAR. THIS IS A VERY SERIOUS ISSUE AND NEEDS TO BE GIVEN A LOT OF ATTENTION. *TR 16 1 Affected Product 17 18 September 4, 2009 NHTSA ID NUMBER: 10282830 **Components: SUSPENSION** 19 NHTSA ID Number: 10282830 20 **Incident Date** September 2, 2009 Consumer Location LEBANON, TN 21 Vehicle Identification Number 1FTSX21PX6E**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** HELLO; I HAVE A 2006 FORD SUPER DUTY 4X4 DIESEL. I HAVE LOW MILES 23,000 AND 25 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 SEEMS ALOT OF FORD SUPER DUTY'S ARE EXPERIENCING THIS PROBLEM. PLEASE 28 ADVISE ME WHAT STEPS TO TAKE AS I AM EXTREMELY CONCERNED. THANKS *TR -35-Class Action Complaint

1 Affected Product 1 2 September 27, 2010 NHTSA ID NUMBER: 10357936 3 **Components: SUSPENSION** 4 **NHTSA ID Number:** 10357936 Incident Date March 1, 2009 5 Consumer Location LEBANON, KY Vehicle Identification Number 1FTSX215X6E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** I HAVE OWNED MY 2006 FORD SD SINCE DECEMBER 2008. SHORTLY AFTER WINTER 10 DURING HIGH WAY DRIVING I EXPERIENCED VIOLENT SHAKING IN THE FRONT END AFTER HITTING A POT WHOLE. I NEARLY LOST CONTROL OF THE VEHICLE WHICH 11 COULD HAS CAUSED A SERIOUS ACCIDENT. I RECEIVED A NOTICE FROM FORD 12 EXPLAINING THAT I NEED TO KEEP THE TIRE PRESSURE AT THE RECOMMENDED LEVEL OR IT WOULD CAUSE THE SHAKING. BUT THE AIR PRESSURE DID NOT CORRECT THE 13 PROBLEM. I BECAME TOO AFRAID TO DRIVE THIS VEHICLE ON ANY EXPRESS WAYS AND LIMITED DRIVING IT IN TOWN AND NON-EXPRESSWAY ROADS. AFTER A YEAR 14 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 THIS VEHICLE BUT I ONLY TRUST IT IN TOWN DRIVING. *TR 16 **1 Affected Product** 17 18 May 21, 2011 NHTSA ID NUMBER: 10403273 **Components: SUSPENSION** 19 NHTSA ID Number: 10403273 **Incident Date** May 15, 2011 20 **Consumer Location** Unknown 21 Vehicle Identification Number 1FTNF21516E**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** UPON HITTING BUMPS ON ROADWAY I LOST COMPLETE CONTROL OF TRUCK FOR 25 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 MY KIDS 27 1 Affected Product 28 -36-

Class Action Complaint

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November 24, 2011 NHTSA ID NUMBER: 10437224
 1
    Components: STEERING, SUSPENSION
2
    NHTSA ID Number: 10437224
    Incident Date April 1, 2011
3
    Consumer Location COVINA, CA
4
    Vehicle Identification Number N/A
    Summary of Complaint
5
    CRASHNo
    FIRENo
6
    INJURIES0
7
    DEATHSO
    I WAS TRAVELING ON THE FREEWAY AT 60 MPH. THE VEHICLE WENT INTO A VIOLENT
8
    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
9
    THAT TIME I WAS AFRAID OF SLAMMING ON THE BRAKES AND LOSING MORE
10
    CONTROL OR POSSIBLY FLIPPING OVER. NOW THIS VIOLENT SHAKING OCCURS EVERY
    TIME I HIT A POT HOLE OR ANY UNEVEN SURFACE AT 55 TO 60 MPH. I HAVE TAKEN MY
11
    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
12
    THIS ON YOU TUBE AS "F-250 DEATH WOBBLE". THIS VIDEO SAYS IT ALL AND IS BASED
13
    ON A STOCK ORIGINAL EQUIPMENT F-250 SUPER DUTY. *TR
    1 Affected Product
14
15
    October 24, 2009 NHTSA ID NUMBER: 10289670
16
    Components: STEERING
    NHTSA ID Number: 10289670
17
    Incident Date October 23, 2009
18
    Consumer Location FRESNO, CA
    Vehicle Identification Number 1FTSW21P56E****
19
    Summary of Complaint
    CRASHNo
20
    FIRENo
21
    INJURIES0
    DEATHSO
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
25
    January 19, 2011 NHTSA ID NUMBER: 10377213
26
    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
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25 26 NHTSA ID Number: 10281566 **Incident Date June 1, 2008** 27 **Consumer Location** Unknown Vehicle Identification Number 1FTWW33P46E**** 28

Summary of Complaint

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Class Action Complaint

Case No.

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CRASHNo 1 **FIRENo** 2 **INJURIES0 DEATHSO** 3 TL*THE CONTACT OWNS A 2006 FORD F350 CREW CAB 4X4 WHICH WAS PURCHASED IN 4 2005. WHILE DRIVING APPROXIMATELY 25 MPH, THE CONTACT LOST STEERING CONTROL WHEN THE STEERING WHEEL BEGAN SHAKING EXCESSIVELY. THE 5 MANUFACTURER STATED THAT THEY WERE AWARE OF THE FAILURE. THE MANUFACTURER ALSO CONFIRMED THAT THERE WERE NO RELATED RECALLS; 6 HOWEVER, THERE WERE TECHNICAL SERVICE BULLETINS. THE FRONT END OF THE 7 VEHICLE WAS REPLACED AS WELL AS PREVIOUS REPAIRS WERE PERFORMED TO CORRECT THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 10,000 AND THE 8 CURRENT MILEAGE WAS 29,000. **1 Affected Product** 9 10 May 26, 2008 NHTSA ID NUMBER: 10228887 11 **Components: STEERING** 12 NHTSA ID Number: 10228887 **Incident Date** May 10, 2008 13 Consumer Location SHADOW HILLS, CA Vehicle Identification Number N/A 14 **Summary of Complaint** 15 **CRASHNo FIRENo** 16 **INJURIES0 DEATHSO** 17 06 F350 DUALLY DIESEL CREW CAB. WHEN DRIVING ANYWHERE BETWEEN 50-70 MPH 18 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 19 VEHICLE ON LOS ANGELES FREEWAYS. HAS HAPPENED MULTIPLE TIMES AND HAVE BEEN TO FORD DEALER WITH NO ASSISTANCE. LAST EPISODE WAS LAST WEEK, THEN 20 MY INSURANCE CO TOLD ME TO FILE COMPLAINT IN CASE OF ACCIDENT THAT IS NOT 21 MY FAULT BUT A VEHICLE DEFECT. AAA ALSO SENT ME TO THIS FORUM OF OTHER FORD OWNERS THAT HAVE HAD THE SAME COMPLAINT. *TR 22 1 Affected Product 23 24 December 1, 2009 **NHTSA ID NUMBER: 10294097 Components: STEERING** 25 NHTSA ID Number: 10294097 26 **Incident Date** November 30, 2009 Consumer Location HONOLULU, HI 27 Vehicle Identification Number 1FTWW31P16E**** **Summary of Complaint** 28 **CRASHNo** -39-

Class Action Complaint

FIRENo 1 **INJURIES0** 2 **DEATHS0** 2006 FORD F350 SUPERDUTY DIESEL DRIVING ON THE FWY MAKING A CURVE ABOUT 3 55MPH THE FRONT END STARTS TO HOP VIOLENTLY AND BOUNCING. ALMOST LOST 4 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 5 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 6 SITUATION FWY SPEEDS AND ANY TYPE OF BUMP IN THE ROAD SURFACE. HAPPENED 7 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 8 WORSE A DEATH. *TR **1 Affected Product** 9 10 October 29, 2014 NHTSA ID NUMBER: 10651012 11 **Components: STEERING** 12 NHTSA ID Number: 10651012 **Incident Date** February 5, 2013 13 Consumer Location STOCKTON, CA Vehicle Identification Number N/A 14 **Summary of Complaint** 15 **CRASHNo FIRENo** 16 **INJURIES0 DEATHS0** 17 STEERING WOBBLE AND SHAKES. THIS HAS BEEN GETTING WORSE AS TIME GOES ON. 18 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 19 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 20 WHICH CAUSES ANOTHER DANGEROUS SITUATION WHILE ON THE FREEWAY. I HAVE 21 CHANGED TIRES, CHECKED PRESSURE AND ROTATED TIRES. ALSO, I REPLACED STEERING DAMPENER, NOTHING HAS WORKED TO DIMINISH THE SHAKE, I ALSO HAD 22 THE 4 WHEEL ALIGNMENT CHECKED AND THE SHOP SHOWED ME THAT IT WAS CORRECT. THEY CHECKED EVERYTHING AND COULD NOT FIND ANYTHING THAT WAS 23 WORN OUT AND NEEDED CHANGING. I WAS TOLD NO REPAIRS NEEDED. THIS IS A VERY 24 DANGEROUS SITUATION AND NEEDS TO BE CORRECTED BEFORE BODIES START PILING UP. *TR 25 1 Affected Product 26 27 June 21, 2009 NHTSA ID NUMBER: 10274553 **Components: SUSPENSION** 28 NHTSA ID Number: 10274553 -40-

Class Action Complaint

Incident Date June 11, 2009 1 Consumer Location JONESBOROUGH, TN 2 Vehicle Identification Number 1FTWW33P86E**** **Summary of Complaint** 3 **CRASHNo** 4 **FIRENo INJURIES0** 5 **DEATHS0** 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 7 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 8 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 9 PRESSURE IS THE PROBLEM, I HAVE ADJUSTED BUT TO NO HELP. THE TRUCK SHIMMYS 10 SHAKES UNCONTROLLABLY, AT EVERY BUMP ENCOUNTERED. THIS IS AN EXTREMELY DANGEROUS SITUATION WHICH IS WIDE SPREAD AMONG SD OWNERS ACCORDING TO 11 POSTINGS ON THE WEB. PLEASE HELP! *TR 1 Affected Product 12 13 November 2, 2010 **NHTSA ID NUMBER: 10363770** 14 **Components: SUSPENSION** 15 **NHTSA ID Number:** 10363770 **Incident Date** August 15, 2010 16 Consumer Location LOOMIS, CA Vehicle Identification Number 1FTWW33P36E**** 17 **Summary of Complaint** 18 **CRASHNo FIRENo** 19 **INJURIES0** 20 **DEATHSO** 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 WHERE THE STEERING BUSHING, SHOCKS, LOWER CONTROL, AND IDLER ARMS WERE 23 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 SPECIFICATIONS TO CORRECT THE FAILURE. THE FAILURE MILEAGE WAS 86,800 AND 26 THE CURRENT MILEAGE WAS 86,444. 27 1 Affected Product 28

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Class Action Complaint

August 19, 2008 NHTSA ID NUMBER: 10238850 1 Components: STEERING, SUSPENSION 2 NHTSA ID Number: 10238850 **Incident Date** August 18, 2008 3 Consumer Location ALEXANDRIA, LA 4 Vehicle Identification Number 1FTSX21537E**** **Summary of Complaint** 5 **CRASHNo FIRENo** 6 **INJURIES0** 7 **DEATHSO** TL*THE CONTACT OWNS A 2007 FORD F250. WHILE DRIVING APPROXIMATELY 70 MPH, 8 THE VEHICLE DROVE OVER A SMALL PATCH IN THE ROAD. THE STEERING WHEEL BEGAN TO SHAKE VIOLENTLY AND THE CONTACT LOST CONTROL OF THE VEHICLE. 9 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 CURRENT AND FAILURE MILEAGES WERE 4,000. 11 1 Affected Product 12 13 September 24, 2009 NHTSA ID NUMBER: 10285160 **Components: SUSPENSION** 14 NHTSA ID Number: 10285160 15 Incident Date August 20, 2008 Consumer Location DOVER, DE 16 Vehicle Identification Number 1FTWW33P47E**** **Summary of Complaint** 17 **CRASHNo** 18 **FIRENo INJURIES0** 19 **DEATHS0** THERE IS A SEVERE SHAKING IN MY FORD F30 SUPER DUTY TRUCK THAT IIS GETTING 20 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 CHARGING ME FOR IT SAID EVERYTHING WAS OK (FAILING TO NOTE MY TIRE DEPTH 22 ON PAPER, WHICH TIRE TREAD WAS EXCELLENT). TOOK IT BACK SEVERAL MONTHS LATER WHEN IT CONTINUED TO GET WORSE AND TREAD WEAR STARTED.PUT ON 23 MACHINE SAID IT WAS ALL GOOD. FAILED TO NOTE DEPTH AGAIN. THEN RECEIVED 24 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 SAYING IT BECAUSE OF THE POOR TIRE TREAD ON TIRES, WHICH WAS PERFECT WHEN I 26 FIRST STARTED TO COMPLAIN ABOUT THE SHIMMY. NOW THEY WANT ME TO BUY 27 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

SENT, AFTER I STATED THAT ITS A KNOWN ISSUE, THEY KEPT SAYING ITS THE 1 CUSTOMERS FAULT FOR NOT MAINTAINING PROPER TIRE PRESSURE. I FIND THAT 2 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 3 FORD F 350 SIMILAR TO MINE HAVING THE SAME SEVERE SHAKE AND BOUNCE AS 4 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 5 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 7 I HAVE ALMOST LOST CONTROL ON THE HIGHWAY, STRAIGHT AWAYS AND CURVES, JUST FROM THE BOUNCE AND 8 SHIMMY. *TR **1 Affected Product** 9 10 February 22, 2014 NHTSA ID NUMBER: 10565456 11 Components: SUSPENSION, STEERING 12 NHTSA ID Number: 10565456 Incident Date February 22, 2014 13 Consumer Location MANCHESTER, MD Vehicle Identification Number 1FTWW31P27E**** 14 **Summary of Complaint** 15 **CRASHNo FIRENo** 16 **INJURIES0 DEATHS0** 17 I WAS DRIVING ON AND OVERPASS/ EXIT RAMP AND PASSED OVER A STEEL DIVIDER 18 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 19 RECEIVED AN INFORMATION BULLETIN FROM FORD ABOUT THIS POTENTIAL "STEERING WOBBLE" AND MADE SURE TO CHECK OUT ALL OF THEIR 20 RECOMMENDATIONS. AFTER DOING SOME RESEARCH ONLINE I FEEL AS THOUGH THIS 21 IS A MAJOR ISSUE AND FORD SHOULD BE DOING SOMETHING BEFORE MORE PEOPLE ARE INJURED OR KILLED. THERE ARE SEVERAL ONLINE FORUMS ADDRESSING THIS 22 ISSUE AND IT SEEMS AS THOUGH FORD IS NOT BEING HELD RESPONSIBLE. *TR 1 Affected Product 23 24 November 2, 2010 NHTSA ID NUMBER: 10363678 25 **Components: STEERING** 26 NHTSA ID Number: 10363678 **Incident Date** April 17, 2009 27 **Consumer Location** Unknown Vehicle Identification Number 1FTWW33P07E**** 28 **Summary of Complaint** -43-

Class Action Complaint

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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
- 6 LOSE CONTROL OF THE VEHICLE. THE VEHICLE WAS TAKEN TO AN AUTHORIZED
- DEALER WHERE THE CONTACT WAS AWAITING A DIAGNOSIS OF THE FAILURE AND
- 7 | REPAIRS. THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS
- 8 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
- 9 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
- 11 | 1 Affected Product
- 12 | 1 Associated Document

14 | July 29, 2010 NHTSA ID NUMBER: 10346223

Components: STEERING

- 15 | NHTSA ID Number: 10346223
- Incident Date July 26, 2010
- 16 Consumer Location JESUP, IA
- 17 Vehicle Identification Number 1FTSX21568E****
- Summary of Complaint
- 18 | CRASHNo
- 19 FIRENO
 - | INJURIESO
- 20 | **DEATHS0**
- I BOUGHT A 2008 FORD F-250 EXTENDED CAB TRUCK AND WHEN I GO OVER A SMALL
- 21 BUMP IN THE ROAD THE FRONT END SHAKES REAL BAD TO THE POINT I ALMOST LOST
- 22 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
- 23 | 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
- ²⁴ MAKE A DIFFERENCE. THE OLD SHOCKS APPEARED TO BE IN GOOD SHAPE YET. I THEN
- 25 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
- 26 60PSI FRONT AND BACK TO IF IT MADE A DIFFERENCE. STILL DID NOT FIX IT. I HAD THE
- 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 GOOGLED MY PROBLEM AND FOUND A LOT OF PEOPLE WITH THE SAME PROBLEM. FORD NEEDS TO COME UP WITH A REPAIR

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Class Action Complaint

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FOR THIS SOON. I WON'T LET MY WIFE DRIVE THIS TRUCK FOR FEAR OF THIS 1 HAPPENING AND HER ENDING UP IN A WRECK. FORD NEEDS TO THINK ABOUT THE 2 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 3 FORD YET BUT THEY NEED TO CURE THIS PROBLEM. THIS PROBLEM IS FOR SURE A DESIGN FLAW. *TR 4 **1 Affected Product** 5 6 March 17, 2009 NHTSA ID NUMBER: 10262107 7 **Components: STEERING** NHTSA ID Number: 10262107 8 **Incident Date June 10, 2008 Consumer Location** Unknown 9 Vehicle Identification Number 1FDWW35R08E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 APPROXIMATELY 50 MPH. ON ONE OCCASION, THE STEERING WHEEL SHOOK SO 15 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 16 REPAIRS, BUT THE FAILURE PERSISTED. HE FILED A COMPLAINT WITH THE MANUFACTURER, BUT HAS YET TO RECEIVE ANY FEEDBACK. THE CURRENT MILEAGE 17 WAS APPROXIMATELY 42,600 AND FAILURE MILEAGE WAS APPROXIMATELY 15,000. 18 1 Affected Product 19 20 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 23 Vehicle Identification Number 1FTWW33R68E**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** I HAVE A 2008 FORD F-350 DUALLY THAT WHEN HITTING A DIP/BUMP IN THE ROAD AT 27 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 28 -45-

Class Action Complaint

APRIL 2009 BASICALLY SAYING WHEN IT HAPPENS SLOW DOWN. THE DEALER REFUSES 1 TO DO ANYTHING. SOMEONE IS GOING TO GET KILLED IF THIS IS NOT FIXED. *TR 2 1 Affected Product 3 4 May 29, 2012 NHTSA ID NUMBER: 10459926 **Components: STEERING, SUSPENSION** 5 NHTSA ID Number: 10459926 **Incident Date** May 29, 2012 6 **Consumer Location MIDLAND. TX** 7 Vehicle Identification Number N/A **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHS0** WHILE DRIVING ABOUT 60MPH ON LOOP 250 HERE IN MIDLAND, TX I WENT OVER AN 11 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 DEATH WOBBLE BEFORE ON MY 2007 FORD F-250 AND NOW IT HAS STARTED ON MY 14 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 PRESSURE ON TIRES. THIS PROBLEM IS A MAJOR ISSUE AND WILL CAUSE SERIOUS 16 ACCIDENTS IF IT HAS NOT ALREADY. AFTER ARRIVING AT WORK I SEARCHED THE INTERNET FOR OTHERS WITH SIMILAR PROBLEMS AND IT SEEMS ALL FORD F-250 4X4'S 17 HAVE THE SAME ISSUE ALL THEY WAY UP TO THE CURRENT MODEL. THERE ARE TONS 18 OF YOUTUBE VIDEOS SHOWING EXACTLY WHAT HAPPENED TO ME STATING THAT FORD WILL NOT CORRECT THE PROBLEM. SOMETHING NEEDS TO BE DONE! 19 HTTP://WWW.YOUTUBE.COM/WATCH?V=8EUQ6F8RGT4 HTTP://WWW.YOUTUBE.COM/WATCH?V=PSDBCV-GCS8 20 HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER-21 DUTY/T0SGDCTMOBHE5JER1/P13 HTTP://WWW.RACE-DEZERT.COM/FORUM/SHOWTHREAD.PHP/82022-F250-OUOT-DEATH-WOBBLE-OUOT-22 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** Vehicle Identification Number N/A 28 **Summary of Complaint** -46-Class Action Complaint

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DEATHSO 1 TRAVELING ON A HIGHWAY AND HIT A SLIGHT BUMP AND A VIOLENT SHAKING 2 STARTED. THE BRAKES WERE APPLIED AND I MANAGED TO PULL ONTO THE SHOULDER. THE SHAKING CONTINUED UNTIL THE TRUCK STOPPED. ALMOST LOST 3 CONTROL OF THE VEHICLE. AFTER INSPECTING THE VEHICLE, FINDING NOTHING 4 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 5 DANGEROUS PROBLEM. *TR 1 Affected Product 6 7 July 21, 2013 NHTSA ID NUMBER: 10526016 8 Components: STEERING, WHEELS, SUSPENSION 9 NHTSA ID Number: 10526016 **Incident Date** July 4, 2013 10 **Consumer Location DALLAS, TX** Vehicle Identification Number N/A 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHSO** 14 I HAVE HAD REPEATED ISSUES WITH THE STEERING OF MY TRUCK. I HAVE TAKEN IT IN 15 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 16 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 17 TRUCK WAY TOO MANY TIMES. *TR 18 **1 Affected Product** 19 20 June 10, 2014 NHTSA ID NUMBER: 10597434 Components: SUSPENSION, STEERING 21 NHTSA ID Number: 10597434 **Incident Date** May 1, 2014 22 **Consumer Location** EL PASO, TX 23 Vehicle Identification Number 1FT7W2BT8BE**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** MY TRUCK STARTS SHAKING VIOLENTLY AT 40-60 MPH. STEERING CONTROL IS LOST 27 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 28 STEERING. SHAKING IS VIOLENT TO THE POINT OF LOOSENING BOLTS. TAKEN TO -48-

Class Action Complaint

DEALER TO BE CHECKED UNDER WARRANTY. THEY CLAIMED IT WAS AIR PRESSURE 1 OR THE NEED FOR NEW TIRES. THE VEHICLES TIRES ARE IN GOOD CONDITION AND AIR 2 PRESSURE IS SET AT FACTORY RECOMMENDED LEVELS. FORD SAYS THIS BEHAVIOR IS NORMAL. A SERIOUS ACCIDENT EXTREMELY POSSIBLE. AN INDEPENDENT SUSPENSION 3 SHOP CLAIMS ISSUE IS DUE TO DEFECTIVE BALL JOINTS, LACK OF STEERING DAMPER, 4 AND DEFECTIVE CONTROL ARMS. *TR **1 Affected Product** 5 6 October 23, 2014 NHTSA ID NUMBER: 10649518 7 Components: STEERING, SUSPENSION NHTSA ID Number: 10649518 8 Incident Date October 22, 2014 9 Consumer Location ZEBULON, NC Vehicle Identification Number 1FT7W2BT9BE**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 MY HUSBAND WAS DRIVING THROUGH A ROAD CONSTRUCTION WORK ZONE WHEN SUDDENLY THE STEERING WHEEL STARTED SHAKING VIOLENTLY AND JUMPED OUT 14 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 THEY SAY THEY HAVE NO KNOWLEDGE OF SUCH ISSUES. THEY TOLD HIM IT WAS 17 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 A SEVERE ACCIDENT DUE TO THIS ISSUE. THE OTHERS SAY THE VEHICLE CONTINUES 19 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 20 . *TR 21 **1 Affected Product** 22 23 August 27, 2015 NHTSA ID NUMBER: 10759761 Components: STEERING, SUSPENSION 24 NHTSA ID Number: 10759761 **Incident Date** August 22, 2015 25 Consumer Location BENNINGTON, NH 26 **Vehicle Identification Number N/A Summary of Complaint** 27 **CRASHNo FIRENo** 28 INJURIES0 -49-

Class Action Complaint

DEATHSO 1 PURCHASED 2011 F-250 86000 MILES ON IT. GOING HOME ON THE HIGHWAY RIGHT 2 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 3 A BUSY HIGHWAY SHOULDER AND LOOK TO SEE IF WE HAD A FLAT TIRE. NOTHING 4 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 5 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 6 "DEATH WOBBLE". VERY DANGEROUS ISSUE THAT FORD WILL NOT ADDRESS. 7 1 Affected Product 8 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 **DEATHS0** 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 REGAIN CONTROL. THE FAILURE RECURRED SEVERAL TIMES. THE VEHICLE WAS 17 TAKEN TO AN INDEPENDENT MECHANIC WHO DIAGNOSED THAT THE SUSPENSION 18 SYSTEM FAILED. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 100,000. 19 1 Affected Product 20 21 May 9, 2018 NHTSA ID NUMBER: 11092739 **Components: SUSPENSION** 22 NHTSA ID Number: 11092739 23 **Incident Date** March 14, 2018 Consumer Location STANSBURY PARK, UT 24 Vehicle Identification Number 1FT7W2BTXBE**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** I BOUGHT THIS TRUCK CERTIFIED USED IN 2011 WITH APPROXIMATELY 9000 MILE ON 28 IT. MY PROBLEM STARTED WHEN THE TRUCK HAD ABOUT 20000 MILES, MORE OR LESS. -50-Class Action Complaint

IT EXPERIENCES THE FAMOUS FORD DEATH WOBBLE REPEATEDLY WHEN DRIVING AT 1 HIGHWAY SPEED AND ENCOUNTERING A SMALL BUMP OR HOLE IN A ROAD. IT IS 2 PARTICULARLY BAD WHEN TRAVELING BETWEEN 50 AND 65 MPH AND MAKING SLIGHT LEFT TURN AS MAY BE ENCOUNTERED ON A FREEWAY ENTRANCE OR EXIT. 3 THE SHAKING IS SO BAD THAT STEERING CONTROL CAN BE TOTALLY LOST. THE ONLY 4 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 5 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 6 BEING IGNORED BY FORD AS "NORMAL" OR BY THE NHTSA DUE TO THE LACK OR A 7 RECALL OR SUGGESTED FIX. **1 Affected Product** 8 9 November 29, 2012 NHTSA ID NUMBER: 10486413 10 Components: SUSPENSION, STEERING NHTSA ID Number: 10486413 11 **Incident Date** November 25, 2012 12 **Consumer Location BENSON, VT** Vehicle Identification Number 1FTRF3DTXBE**** 13 **Summary of Complaint CRASHNo** 14 **FIRENo** 15 **INJURIES0 DEATHS0** 16 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 17 TO SLOW TRUCK DOWN TO 25 MPH. I ALMOST WAS REAR ENDED BY A TRUCK 18 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 19 NEW. *TR **1 Affected Product** 20 21 June 7, 2015 NHTSA ID NUMBER: 10723796 22 **Components: STEERING** 23 NHTSA ID Number: 10723796 **Incident Date June 6, 2015** 24 Consumer Location FARIBAULT, MN Vehicle Identification Number 1FT8W3BT7BE**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHS0** 28 -51-

Class Action Complaint

I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND 1 VISE VERSA WITH A LOT OF PLAY. IT HAPPENS RANDOMLY. THE FRONT END WILL 2 SHAKES BECAUSE OF NO STEERING MAKING THE TRUCK UNCONTROLLABLE. IT IS VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. THE 3 DEALER SAYS THERE IS NOTHING WRONG AND HAVE REPLACED TIE ROD ENDS ALONG 4 WITH BRAKES. **1 Affected Product** 5 6 March 15, 2013 NHTSA ID NUMBER: 10503219 7 Components: STEERING, SUSPENSION NHTSA ID Number: 10503219 8 **Incident Date** January 15, 2013 Consumer Location WEST MONROE, LA 9 Vehicle Identification Number 1FT7W2BT7CE**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 WHILE DRIVING 60 MPH, TRUCK HIT IRREGULARITIES IN THE ROAD. VEHICLE STARTED SHAKING VIOLENTLY AND LOST CONTROL OF THE STEERING. VEHICLE HAD TO BE 14 SLOWED TO 10-15 MPH BEFORE THE SHAKING STOPPED. NO ACCIDENT OR INJURY 15 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 MERE 11,000 MILES LATER. WHILE TRAVELING 55-60 MPH THROUGH A LEFT HAND CURVE AND CROSSING ANOTHER IRREGULARITY IN THE ROAD (BRIDGE-PAVEMENT 17 JOINT) THE TRUCK AGAIN BEGAN SHAKING VIOLENTLY AND CAUSED THE VEHICLE TO 18 GO INTO THE ONCOMING LANE OF TRAFFIC WHERE A LOG TRUCK WAS TRAVELING. THE LOG TRUCK WAS ABLE TO GET ON THE SHOULDER OF THE ROAD IN TIME TO 19 PREVENT AN ACCIDENT. AGAIN THE TRUCK HAD TO BE SLOWED TO ALMOST A COMPLETE STOP BEFORE THE SHAKING STOPPED. TRUCK WAS TAKEN TO DEALER 20 AGAIN AND THE ONLY THING REPLACED WAS THE TRACK BAR BUSHING. THIS 21 VEHICLE IS NOT SAFE! *TR 1 Affected Product 22 23 November 16, 2016 NHTSA ID NUMBER: 10926570 24 **Components: STEERING, SUSPENSION NHTSA ID Number:** 10926570 25 **Incident Date** March 9, 2016 26 **Consumer Location LAFAYETTE. LA** Vehicle Identification Number 1FT7W2BT0CE**** 27 **Summary of Complaint CRASHNo** 28 **FIRENo** -52-

Class Action Complaint

INJURIES0 1 **DEATHS0** 2 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 3 WHERE CONTROL OF THE VEHICLE IS ALMOST LOST. THE ONLY WAY TO REMEDY THE 4 WOBBLE/VIBRATION IS TO HIT THE BRAKES AND SLOW THE VEHICLE DOWN. THIS ONLY OCCURS WHEN DRIVING OVER UNEVEN PAVEMENT, POT HOLES OR WASHBOARD 5 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 6 DEALERS I BROUGHT IT TO EVEN AGREED THAT IT IS A COMMON PROBLEM THAT 7 THEY HAVE BEEN DEALING WITH. THIS PROBLEMS OCCURS ALMOST EVERY HIGHWAY TRIP I TAKE. 8 **1 Affected Product** 9 10 January 17, 2018 NHTSA ID NUMBER: 11063319 **Components: STEERING** 11 NHTSA ID Number: 11063319 12 **Incident Date** January 1, 2018 Consumer Location ARCADIA, FL 13 Vehicle Identification Number N/A **Summary of Complaint** 14 **CRASHNo** 15 **FIRENo INJURIES0** 16 **DEATHS0** TL* THE CONTACT OWNS A 2012 FORD F-250. WHILE DRIVING 65 MPH, THE CONTACT 17 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. WHILE PASSING THE OTHER VEHICLE, THE CONTACT'S VEHICLE SHOOK VIOLENTLY 19 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 20 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 FAILURE WAS CALLED THE "FORD DEATH WOBBLE". THE VEHICLE WAS NOT 22 REPAIRED. THE MANUFACTURER WAS ALSO CONTACTED AND DID NOT ASSIST. THE FAILURE MILEAGE WAS 128,000. THE VIN WAS UNAVAILABLE. 23 1 Affected Product 24 February 10, 2014 NHTSA ID NUMBER: 10563791 25 Components: WHEELS, STEERING, SUSPENSION 26 **NHTSA ID Number:** 10563791 **Incident Date** February 8, 2014 27 **Consumer Location** Unknown Vehicle Identification Number 1FT8W3BT0CE**** 28 **Summary of Complaint** -53-Class Action Complaint

27 **Summary of Complaint**

Vehicle Identification Number 1FT7W2BT3DE****

CRASHNo FIRENo

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Class Action Complaint

INJURIES0 1 **DEATHS0** 2 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 3 SLOW DOWN TO ALMOST 35 MPH VIBRATION STOPPED AND CONTINUED ON DOWN 4 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 5 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!!!!! 6 **1 Affected Product** 7 8 August 27, 2017 NHTSA ID NUMBER: 11019943 Components: STEERING, SUSPENSION 9 NHTSA ID Number: 11019943 10 **Incident Date** August 24, 2017 Consumer Location LOUISVILLE, CO 11 Vehicle Identification Number 1FT7X2B67FE**** 12 **Summary of Complaint CRASHNo** 13 **FIRENo INJURIES0** 14 **DEATHS0** 15 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 16 HIGHWAY SPEEDS I HAVE LITERALLY LOST CONTROL ENOUGH THAT I CROSS LANES, UNCONTROLLABLY BECAUSE I HAVE ENCOUNTERED DEFECTS IN THE ROAD SURFACE. 17 I HAVE TRAVELED ACROSS THE SAME ROAD SURFACE IN OTHER VEHICLES AT 18 SIMILAR SPEEDS AND HAVE NO NOTICABLE EFFECTS. THE 2015 F250 SD HAS THE SAME LOSS IN CONTROL EVERY TIME. 19 **1 Affected Product** 20 21 October 30, 2016 NHTSA ID NUMBER: 10920115 Components: ELECTRONIC STABILITY CONTROL, SUSPENSION, POWER TRAIN 22 NHTSA ID Number: 10920115 23 Incident Date October 30, 2016 Consumer Location STRASBURG, OH 24 Vehicle Identification Number 1FTBF2B65GE**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** I WAS DRIVING DOWN THE HIGHWAY AND ALL OF A SUDDEN TWICE WITHIN 10 MILES 28 OF EACH OTHER MY TRUCK STARTED VIOLENTLY SHAKING ALOST SENDING ME INTO -55-

Class Action Complaint Case No.

ANOTHER LANE AND LOSING CONTROL. HAD TO SLOW DOWN ALMOST TO A STOP 1 BEFORE IT WOULD QUIT. *TR 2 **1 Affected Product** 3 4 March 19, 2018 NHTSA ID NUMBER: 11080186 Components: ELECTRICAL SYSTEM, STEERING, SUSPENSION 5 NHTSA ID Number: 11080186 **Incident Date** January 11, 2018 6 Consumer Location VILLA RICA, GA 7 Vehicle Identification Number 1FT7W2B61HE**** **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHS0** 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 DOWN AND REGAIN CONTROL. I BEGIN TO DO SOME RESEARCH AND LEARN OF THE 13 DEATH WOBBLE THAT FORD IS AWARE OF, I WILL NOW TAKE MY VEHICLE IN TO HAVE THE SUSPENSION CHECKED. SECONDLY, I HAVE BEEN HAVING ISSUE'S WITH MY SYNC3 14 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 WAS TOLD THE SYNC3 SYSTEM, A COUPLE MODULES AND THE CHASSIS HARNESS WAS 16 REPLACED TO CORRECT THE ISSUE'S. I HAVE TAKEN MY TRUCK TO FORD THREE TIME FOR THE SYNC3 MALFUNCTION AND WAS TOLD NOT TO USE THE BLUETOOTH 17 STREAMING WITH APPLE PRODUCTS, WHICH DOESN'T MAKE SENSE IF IT'S SUPPOSE TO 18 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 19 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 Incident Date October 6, 2018 25 Consumer Location MECHANICSVILLE, VA 26 Vehicle Identification Number 1FT7W2BT5HE**** **Summary of Complaint** 27 **CRASHNo FIRENo** 28 **INJURIES0** -56-

Class Action Complaint

DEATHSO 1 WHILE TRAVELING AT APPROXIMATELY 40-45 MPH, WHEN I HIT A BUMP OR SERIES OF 2 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 3 (70MPH) GOING STRAIGHT HIT A COUPLE BUMPS IN THE ROAD AND THE TRUCKS 4 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 5 THING TO HAPPEN AT THOSE SPEEDS. I COULD HAVE EASILY LOST CONTROL AND CAUSED A HORRIBLE ACCIDENT. 6 **1 Affected Product** 7 8 November 21, 2018 NHTSA ID NUMBER: 11153165 **Components: STEERING, SUSPENSION** 9 NHTSA ID Number: 11153165 10 Incident Date November 12, 2018 **Consumer Location WALLER, TX** 11 Vehicle Identification Number 1FT7W2BT2HE**** 12 **Summary of Complaint CRASHNo** 13 **FIRENo INJURIES0** 14 **DEATHS0** 15 WHILE DRIVING ABOUT 55 MPH ON A RURAL ROAD, I HIT A WASHBOARD SPOT IN THE ROAD. THE STEERING WHEEL STARTING OSCILLATING WILDLY. I ALMOST LOST 16 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 17 . FORTUNATELY I WAS ON A RURAL ROAD AND HAD NO SIDE BY SIDE TRAFFIC AS 18 THAT COULD HAVE BEEN CATASTROPHIC. **1 Affected Product** 19 20 November 30, 2018 NHTSA ID NUMBER: 11155263 21 **Components: SUSPENSION** NHTSA ID Number: 11155263 22 **Incident Date** November 30, 2018 23 **Consumer Location HESPERIA. CA** Vehicle Identification Number 1FT7W2B67HE**** 24 **Summary of Complaint CRASHNo** 25 **FIRENo** 26 **INJURIES0 DEATHSO** 27 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 28 THE TRUCK STARTED VIOLENTLY SHAKING. IF IT HADN'T BEEN FOR LIGHT TRAFFIC -57-

Class Action Complaint

ALLOWING ME TO MOVE OVER TO THE SHOULD QUICKLY THEN I WOULD HAVE LOST 1 CONTROL OF THE TRUCK. IT WAS TERRIFYING. AFTER DOING A QUICK SEARCH ONLINE 2 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 3 GOING TO DIE. 4 1 Affected Product 5 January 24, 2019 NHTSA ID NUMBER: 11171762 6 **Components: STEERING, SUSPENSION** 7 NHTSA ID Number: 11171762 **Incident Date** January 23, 2019 8 Consumer Location APPLE VALLEY, CA 9 Vehicle Identification Number 1FT7W2BT5HE**** **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** DRIVING AT 65-70 MPH ON A CONCRETE PAVED HIGHWAY. HIT A ROUGH PATCH OF 13 PAVEMENT OR EXPANSION JOINT, AND THE FRONT END BEGAN SHAKING VIOLENTLY, AS IF ONE OR BOTH OF THE FRONT TIRES HAD FLATTED. I COULD SEE THE HOOD 14 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 HAVE WORN OUT, NOT THE HIDDEN ISSUE THAT IS CAUSING HEAVY DUTY 17 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 Incident Date October 26, 2018 22 Consumer Location JONESBORO, AR 23 Vehicle Identification Number 1FT7W2B68HE**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** 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 MUST IMMEDIATELY BRAKE TO SLOW THE TRUCK TO 20MPH OR LESS TO REGAIN 28 CONTROL. TODAY WAS THE WORST OCCURRENCE - COMPLETELY LOST CONTROL AND

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Class Action Complaint

SWERVED OVER BOTH ADJACENT LANES BEFORE RECOVERING. WAS TRAVELING AT 65 1 MPH. NO TRAFFIC NEAR, SO NO ACCIDENT OCCURRED. WHEN DRIVING OVER A BRIDGE 2 EXPANSION JOINT, TRUCK STEERING WHEEL CANNOT BE HELD FIRM DUE TO REACTION TO THE EXPANSION JOINT AND THE STEERING. ALL THESE HAVE OCCURRED 3 ON BOTH PAVED COUNTY ROADS, STATE HIGHWAYS, AND INTERSTATES AND DRIVING 4 STRAIGHT AHEAD. 1 Affected Product 5 6 November 13, 2018 NHTSA ID NUMBER: 11151224 7 **Components: STEERING** NHTSA ID Number: 11151224 8 Incident Date October 27, 2018 Consumer Location GRIMESLAND, NC 9 Vehicle Identification Number 1FT7W2B65HE**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 LEFT. THE CONTACT ALMOST LOST CONTROL OF THE VEHICLE. THERE WAS NO 15 WARNING INDICATOR ILLUMINATED. THE FAILURE RECURRED. THE VEHICLE WAS TAKEN TO DEACON JONES FORD-LINCOLN, INC. (919-736-3387, LOCATED AT 3301 16 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 17 TECHNICIAN TO REMEDY THE FAILURE. THE TECHNICIAN STATED THAT THE VEHICLE 18 WAS NOT MANUFACTURED BY THE DEALER. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND PROVIDED A CASE NUMBER. THE VEHICLE WAS NOT REPAIRED. 19 THE FAILURE MILEAGE WAS APPROXIMATELY 24,000. 1 Affected Product 20 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 DEATHSO** 28 -59-

Class Action Complaint

17 NOV 2018, WIFE AND I WERE TRAVELING SB ON I-15 NEAR BOUNTIFUL, UT GOING 1 ABOUT 70MPH WHEN I WENT OVER A BUMP (WHERE THE ROAD TURNS INTO A BRIDGE). 2 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 3 NOT MAKING CONTACT WITH THE ROAD. WE WERE ABLE TO REGAIN CONTROL AND 4 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 5 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 6 TRAILER, I WOULD HAVE LOST COMPLETE CONTROL AND WOULD HAVE BEEN IN AN 7 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 8 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 9 VIDEO THAT AS SOON AS I CROSS OVER THE BRIDGE, THE TRUCK REACTS TO IT AND 10 STARTS TO VIOLENTLY SHAKE. THE HOOD CAN CLEARLY BE SEEN VIBRATING AND THE DASH CAM RECORDS AND SAVED THE EVENT AS A CRASH. 11

1 Affected Product

13 December 10, 2018 **NHTSA ID NUMBER: 11157283**

14 | Components: STEERING

NHTSA ID Number: 11157283 Incident Date December 8, 2018

Consumer Location LITTLETON, CO

Vehicle Identification Number 1FT7W2BT7HE****

17 | Summary of Complaint

CRASHNo

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| INJURIES0

|| DEATHS0

- 20 WHILE DRIVING ON AN INTERSTATE BETWEEN 60 & 65 MPH I HIT A BUMP AND IMMEDIATELY ENCOUNTERED A SEVERE VIBRATION FROM THE FRONT END THROUGH
- 21 THE STEERING WHEEL. THE VIBRATION WAS SO SUDDEN AND VIOLENT THAT I

22 NEARLY LOST CONTROL. I IMMEDIATELY SLOWED THE VEHICLE AND AT

APPROXIMATELY 50 MPH THE VIBRATION STOPPED. I EXITED THE HIGHWAY AND

23 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

24 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 FAMILY 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

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Class Action Complaint

1 February 21, 2018 NHTSA ID NUMBER: 11074031 2 **Components: STEERING, SUSPENSION** NHTSA ID Number: 11074031 3 **Incident Date** February 2, 2018 4 Consumer Location MIDLAND, TX Vehicle Identification Number 1FT8W3BT3HE**** 5 **Summary of Complaint CRASHNo** 6 **FIRENo** 7 **INJURIES0 DEATHS0** 8 IN MOTION ON A HIGHWAY AT 70 MILES PER HOUR. THE TRUCK HIT AN UNEVEN CONDITION ON THE ROAD. THE TRUCKS STEERING CAPABILITY WAS TOTALLY 9 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 WHEELS WERE STILL VIOLENTLY SHAKING AND BOUNCING.AT THIS POINT STILL WITH 12 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 DIDN'T STOP UNTIL THE VEHICLE CAME TO A COMPLETE STOP.AFTER MUCH 14 RESEARCH I LEANED THAT THIS MECHANICAL STEERING PROBLEM HAS BEEN A REACURING MALFUNCTION.IT HAS BEEN NAMED THE DEATH WOBBLE.HOW CAN FORD 15 CONTINUE TO MANUFACTURE A PRODUCT WITH DOCUMENTED EXTREME SAFETY 16 ISSUES.ITS OBVIOUS THAT FORD HAS MADE THIS EXTREMELY DANGEROUS CONDITION AN ONGOING PROCESS.IM AMAZAZED THAT WITH ALL THE PAST 17 COMPLAINTS CONCERNING THE DEATH WOBBLE THAT ITS BECOME NOTHING MORE THAN A BAND-AID FIX.PLEASE ADDRESS AND CORRECT THIS ONGOING NEGLIGENT 18 MANUFACTURING PROCESS THAT FORD CONTINUES. THEY KNOWINGLY CONTINUE TO 19 PLACE INNOCENT CONSUMERS INTO A LIFE OR POSSIBLE DEATH SITUATION. 1 Affected Product 20 21 October 11, 2018 NHTSA ID NUMBER: 11139700 22 **Components: STEERING, SUSPENSION** NHTSA ID Number: 11139700 23 **Incident Date** October 10, 2018 24 **Consumer Location SALEM, MO** Vehicle Identification Number 1FT8W3BTXHE**** 25 **Summary of Complaint CRASHNo** 26 **FIRENo** 27 **INJURIES0 DEATHSO** 28 -61-

Class Action Complaint

I OWN A 2017 FORD F-350. THIS TRUCK IS FULLY STOCK, NO MODS OF ANY KIND. NO 1 ABUSE. MAINTENANCE IS ALWAYS ON TIME AND TIRES ARE ALWAYS ROTATED AND 2 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 3 INTO THE DEATH RATTLE. THE FRONT END SHOOK SO HARD I ALMOST LOST CONTROL. 4 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, 5 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 7 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 8 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 9 RISK THEIR LIVES BECAUSE FORD HASN'T COME UP WITH A SOLUTION TO THIS 10 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. 11

1 Affected Product

13 December 10, 2018 NHTSA ID NUMBER: 11157298

Components: STEERING, SUSPENSION 14

NHTSA ID Number: 11157298 **Incident Date** December 8, 2018

Consumer Location DRIFTWOOD, TX

Vehicle Identification Number 1FT7W2BT0JE****

Summary of Complaint 17

CRASHNo

18 **FIRENo**

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INJURIES0

DEATHS0

AT 7909 MILES SINCE NEW THE VEHICLE EXHIBITED A VIOLENT OSCILLATION OF THE 20 STEERING WHEEL COUPLED WITH ENORMOUS SHAKING IN THE FRONT SUSPENSION,

21 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

January 16, 2019 **NHTSA ID NUMBER: 11170395** Components: STEERING, SUSPENSION, WHEELS

NHTSA ID Number: 11170395 **Incident Date** January 14, 2018

Consumer Location BALDWINSVILLE, NY

Class Action Complaint

Case No.

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```
Vehicle Identification Number 1FT7W2B67JE****
 1
    Summary of Complaint
2
    CRASHNo
    FIRENo
3
    INJURIES0
4
    DEATHS0
    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
    CAN CONTINUE ON. THE SHAKING IS SO VIOLENT I THOUGHT THE TRUCK / I WAS
    GOING TO FLIP OVER BECAUSE OF LACK OF STEERING.
9
    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
    INJURIES0
17
    DEATHS0
18
    EXPERIENCED STEERING WHEEL OSCILLATION (DEATH WOBBLE) THIS HAS OCCURED
    WHILE DRIVING ON THE INTERSTATE AFTER DRIVING OVER AN UNEVEN PAVEMENT
19
    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
    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
24
    December 2, 2018 NHTSA ID NUMBER: 11155421
25
    Components: STEERING
26
    NHTSA ID Number: 11155421
    Incident Date November 17, 2018
27
    Consumer Location MURPHYSBORO, IL
    Vehicle Identification Number 1FT7W2BT1JE****
28
    Summary of Complaint
                                          -63-
    Class Action Complaint
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26

Consumer Location ENON VALLEY, PA

Vehicle Identification Number 1FTSX21565E****

Summary of Complaint

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Class Action Complaint

Case No.

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CRASHNo 1 **FIRENo** 2 **INJURIES0 DEATHSO** 3 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 STEERING CONTROL AND WILL NOT STOP UNTIL SLOWING BELOW 40MPH. AFTER 5 READING SEVERAL POSTS ONLINE I SEE THIS IS AN ONGOING PROBLEM WITH THESE TRUCKS AND NEEDS TO BE FIXED BEFORE SOMEONE GETS KILLED. *TR 6 **1 Affected Product** 7 8 March 26, 2008 NHTSA ID NUMBER: 10222348 **Components: SUSPENSION** 9 NHTSA ID Number: 10222348 10 **Incident Date June 6, 2007** Consumer Location WILMINGTON, DE 11 Vehicle Identification Number 1FTSW21535E**** 12 **Summary of Complaint CRASHNo** 13 **FIRENo INJURIES0** 14 **DEATHS0** 15 2005 F-250 HAS DANGEROUS SHAKE IN FRONT END OF VEHICLE, TO THE POINT OF LOOSING CONTROL OF VEHICLE ON HIGHWAY. TRUCK BOUNCED OVER FOUR LANES 16 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 17 HAD BEEN IN THE AFTERNOON, THERE WOULD HAVE BEEN A CRASH AND 18 POSSIBLE FATALITIES. 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 ON IT AND SOME OTHER STUFF. TRUCK STILL HAS A CONSIDERABLE SHAKE TO THE 20 FRONT END. WE RECENTLY TOOK THE TRUCK TO A 'NON' FORD MECHANIC. THREE TIE 21 RODS ARE BAD AND THE STABILIZER SHOCKS ARE BAD. HE STATED THIS IS BECAUSE THE FRONT END IS SHAKING SO BAD IT IS WEARING OUT THE RODS/SHOCKS. THE 22 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 23 FIX THIS ISSUE? *TR 24 **1 Affected Product** 25 26 May 14, 2008 NHTSA ID NUMBER: 10227804 **Components: SUSPENSION** 27 NHTSA ID Number: 10227804 **Incident Date** May 12, 2007 28 **Consumer Location HURLEY, NM**

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Class Action Complaint

Vehicle Identification Number 1FTSX21P05E**** 1 **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** WHEN TRAVELING AT INTERSTATE HIGHWAY SPEEDS, TRAVELING OVER 5 BRIDGE/OVERPASS EXPANSION JOINTS WILL CAUSE THE FRONT AXLE/STEERING TO SHAKE VIOLENTLY. THIS SEEMS TO SET UP SOME KIND OF WEIRD HARMONIC 6 VIBRATION THAT THE FRONT END CANNOT RECOVER FROM. EVEN AFTER THE ROAD 7 SMOOTHES OUT, FRONT AXLE WILL CONTINUE TO SHAKE VIOLENTLY UNTIL SPEED IS DECREASED TO ABOUT 40MPH. THIS SHAKING IS INCREDIBLY VIOLENT. A LOSS OF 8 CONTROL IS HIGHLY POSSIBLE. TRUCK HAS BEEN TO THE DEALER TWICE AND HAD THE STEERING STABILIZER REPLACED, THIS HAS NOT FIXED THE ISSUE. DEALER HAS 9 NOT BEEN ABLE TO DUPLICATE THE PROBLEM DUE TO THE RANDOM OCCURRENCE 10 AND SPECIFIC ROAD CONDITIONS REQUIRED. I HAVE DRIVEN FORD TRUCKS MY ENTIRE LIFE, THIS IS NOT A NORMAL "CHARACTERISTIC OF VEHICLE". SOMETHING IS 11 WRONG WITH THE DESIGN ON THE FRONT END OF THESE TRUCKS. MY WIFE WILL NOT DRIVE IT. SOMEBODY IS GOING TO GET KILLED. *TR 12 1 Affected Product 13 14 August 15, 2008 NHTSA ID NUMBER: 10238374 15 **Components: SUSPENSION** NHTSA ID Number: 10238374 16 **Incident Date** August 15, 2008 Consumer Location PRESCOTT VALLEY, AZ 17 Vehicle Identification Number 1FTSW21595E**** 18 **Summary of Complaint CRASHNo** 19 **FIRENo** 20 **INJURIES0 DEATHSO** 21 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 24 NOT FIX! HAVE HAD MY FRONT END MAN LOOK AT FRONT END, AND HE COULD ONLY FIND SLACK IN THE STEERING GEAR BOX, BUT THAT DIDN'T FIX THE PROBLEM EITHER. 25 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 26 WHEEL TRAILER BEHIND ME AND IT TOOK ME ACROSS 2 LANES OF TRAFFIC INTO THE 27 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 28 FORD MAN FOR OVER 35 YEARS. THE ONLY WAY TO STOP THE VIOLENT SHAKING IS TO

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Class Action Complaint Case No.

SLAM BRAKES ON AND REDUCE SPEED TO UNDER 35 MPH. I HAVE PUT UP WITH THE 1 PROBLEM FOR SOME TIME AS THE TRUCK NOW HAS 61,000 MILES ON IT! *TR 2 1 Affected Product 3 4 September 3, 2008 NHTSA ID NUMBER: 10240851 Components: SUSPENSION, STEERING 5 NHTSA ID Number: 10240851 **Incident Date July 16, 2008** 6 Consumer Location DEL NORTE. CO 7 Vehicle Identification Number 1FTSW21P35E**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHSO** I OWN A 2005 SUPER DUTY POWER STROKE AND WHEN I HIT A POT HOLE OR WHEN I'M 11 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 EVEN LIKE DRIVING IT CAUSE YOU DON'T KNOW WHEN IT'S GOING TO HAPPEN. IT'S 13 KIND OF SAD WHEN YOU PAY SO MUCH FOR A NICE TRUCK AND YOUR AFRAID TO DRIVE IT. I THINK FORD NEEDS TO HAVE A RECALL ON THESE TRUCKS BEFORE 14 SOMEONE GETS KILLED, IT REALLY IS THAT BAD! *TR 15 **1 Affected Product** 16 November 9, 2008 NHTSA ID NUMBER: 10248066 17 Components: SUSPENSION, STEERING 18 NHTSA ID Number: 10248066 **Incident Date** November 2, 2008 19 Consumer Location HARVARD, IL Vehicle Identification Number 1FTSX21595E**** 20 **Summary of Complaint** 21 **CRASHNo FIRENo** 22 **INJURIES0** 23 **DEATHS0** 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 CONTROL, IT FEELS AS IF THE WHOLE FRONT END IS COMING APART!)? SEVERE 25 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 ACCIDENT, ALMOST LIKE BOTH FRONT TIRES BLOW OUT AT THE SAME TIME, SEVERE 27 STEERING DIFFICULTIES WHEN THIS HAPPENS. IF YOU COME TO A COMPLETE STOP AND THEN TAKE OFF IT STOPS?INTERMITTENT BUT INCREDIBLY DANGEROUS! HAS 28 HAPPENED 3 TIMES WITHIN THE LAST 2 WEEKS?ONCE ON A GRAVEL ROAD, ONCE ON A -67-

Class Action Complaint

ROAD WITH POTHOLES AND ONCE ON RT43 SMOOTH AS GLASS ROAD AT A SPEED OF 1 65MPH?THIS IS ALWAYS A SUDDEN ONSET- NO WARNING?THIS NEEDS TO BE 2 ADDRESSED, MY CHILDREN WERE IN THE CAR WHEN WE WERE GOING ON RT43..THIS COULD HAVE KILLED US HAD IT BEEN A TWO LANE ROAD AS WE WERE JUST 3 DOING THE SPEED LIMIT OF 65MPH AND ALL OF THE SUDDEN THE FRONT END IS 4 ALL OVER THE PLACE AND OUT OF CONTROL! IT WAS ALMOST IMPOSSIBLE TO CONTROL...I HAD THE BRAKES TO THE FLOORBOARD AND THE FRONT END OF THE 5 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 6 WOBBLE BUT HAD IT NOT HAPPENED TO US WE WOULD NOT KNOW ABOUT IT! THERE 7 SHOULD AT MINIMUM BE A WARNING THIS COULD GET PEOPLE KILLED IF IT IS NOT ADDRESSED...PLEASE, INVESTIGATE THIS ON THE F250 OURS IS A 2005 BUT I HAVE 8 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 9 WEEKS BEFORE! THIS IS A SCARY SITUATION, I AM JUST THANKFUL THAT THERE 10 WEREN'T A LOT OF OTHER CARS ON THE ROAD OR I FEAR THAT I WOULDN'T BE AROUND TO WRITE THIS COMPLAINT...IT IS THIS SEVERE...NO EXAGGERATION! 11 THIS NEEDS TO BE ADDRESSED! *TR 1 Affected Product 12 13 January 21, 2009 NHTSA ID NUMBER: 10255935 14 **Components: SUSPENSION** 15 NHTSA ID Number: 10255935 **Incident Date** January 21, 2009 16 Consumer Location ROSEBURG, OR Vehicle Identification Number 1FTSX21585E****

17

Summary of Complaint

18 **CRASHNo**

FIRENo 19

INJURIES0

20 **DEATHSO**

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SEVERE SUSPENSION AND STEERING WHEEL SHIMMY AFTER HITTING UNEVEN ROAD 21 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 23

TO PULL OVER AND STOP. IF THIS HAPPEN ON A NARROW SHOULDER FREEWAY 24 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

April 15, 2009 NHTSA ID NUMBER: 10265529 28

Components: SUSPENSION

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Class Action Complaint

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NHTSA ID Number: 10265529
 1
    Incident Date March 20, 2009
2
    Consumer Location MANASQUAN, NJ
    Vehicle Identification Number N/A
3
    Summary of Complaint
4
    CRASHNo
    FIRENo
5
    INJURIES0
    DEATHS0
6
    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 DIS-ENGAGED FROM THE REST
    OF THE BODY. THE STEERING WHEEL SHOOK SO VIOLENTLY I COULD HARDLY HOLD
9
    ON TO IT. I TOOK MY FOOT OFF THE GAS AND APPLIED THE BREAK VERY GENTLY. I
10
    MUST HAVE SLOWED DOWN TO 30 MPH BEFORE THE TRUCK BECAME UNDER CONTROL
    AGAIN. MEANWHILE THE CAR BEHIND ME HAD TO SLAM ON HIS BREAKS DO TO MY
11
    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
12
    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
    SERVICED BY A FORD DEALERSHIP AS IT HAS BEEN SINCE I PURCHASED IT NEW. THIS
14
    HAS HAPPENED AT LEAST 4 TIMES TOTAL. I CANNOT STRESS TO YOU ENOUGH HOW
    VIOLENT THIS "SHIMMY" IS. THIS IS NO SHIMMY! THIS IS LIKE RUNNING OVER A
15
    SERIES OF TELEPHONE POLES LINED UP IN THE ROAD. IT IS ALMOST IMPOSSIBLE TO
16
    HOLD ON TO THE STEERING WHEEL LET ALONE HAVE CONTROL OF THE TRUCK. THIS
    IS AN EXTREMELY DANGEROUS SITUATION THAT NEEDS TO BE CORRECTED ASAP
17
    OR SOMEBODY IS SURE TO DIE BECAUSE OF THIS FLAW. I WOULD BE AFRAID TO
    HAVE MY WIFE OR CHILDREN DRIVE THIS TRUCK AND HAVE THIS HAPPEN. THEIR
18
    LIVES WOULD SURELY BE IN DANGER. PLEASE DO SOMETHING TO CORRECT THIS
19
    SERIOUS PROBLEM, OR GET THIS DANGEROUS TRUCK OFF THE ROAD, *TR
    1 Affected Product
20
21
    April 17, 2009 NHTSA ID NUMBER: 10265891
22
    Components: SUSPENSION, STEERING, EQUIPMENT
    NHTSA ID Number: 10265891
23
    Incident Date April 1, 2009
24
    Consumer Location PUYALLUP, WA
    Vehicle Identification Number 1FTSW21P05E****
25
    Summary of Complaint
    CRASHNo
26
    FIRENo
27
    INJURIES0
    DEATHSO
28
                                         -69-
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Class Action Complaint

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LOSE OF STEERING DO TO POOR DESIGN OF FORD F-250 AND F-350 SOLID FRONT AXLE
 1
    WITH SPRINGS. FROM 2005 TO PRESENT. I HAVE NEW TIRES AND RIMS, BALANCED, HAD
2
    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
3
    HAVE CONTACTED LEGAL ADVICE FROM THE ADVICE OF OTHER GOVERNMENT
4
    AGENCIES. THE ATTORNEY GENERALS OFFICE, BBB, AND THE CONSUMER PROTECTION
    AGENCY. THIS IS MY SECOND COMPLAINT ABOUT THIS MATTER, AND IM A LITTLE
5
    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.
6
    I'VE SPENT THOUSANDS TO HELP DEAL WITH MATTER TO NO BETTER RESULTS. SO
7
    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
8
    WITH THERE FRONT ENDS OF THERE F-250 AND F-350 SD PICKUPS FROM 2005 TO
    PRESENT. I HOPE IT DOESN'T TAKE SOMEONE GETTING KILLED BEFORE FORD
9
    SAYS THEY NEED TO FIX THERE TRUCKS. LIKE THEY DID WITH THERE BAD TIRE
10
    SITUATION ON FORD EXPLORER. *TR
    2 Affected Products
11
12
    January 2, 2010 NHTSA ID NUMBER: 10297813
13
    Components: SUSPENSION
    NHTSA ID Number: 10297813
14
    Incident Date August 20, 2009
15
    Consumer Location SAYRE, PA
    Vehicle Identification Number 1FTNF215X5E****
16
    Summary of Complaint
    CRASHNo
17
    FIRENo
18
    INJURIES0
    DEATHSO
19
    I HAVE A 2005 FORD F250 SD AND I HAVE HAD THE FRONT END SHIMMY OUT OF
    CONTROL ON ME 2 TIME. I HAVE STOCK TIRES ON IT TIRE PRESSURE IS AT
20
    MANUFACTURERS SPECS AND THIS IS JUST EXTREMELY DANGEROUS SOMEONE IS
21
    GOING TO GET KILLED BUY THIS. FORD OR SOMEONE NEEDS TO FIX THIS PROBLEM.
    THANK YOU TOBY LEE *TR
22
    1 Affected Product
23
24
    January 31, 2010 NHTSA ID NUMBER: 10303457
    Components: STEERING, SUSPENSION
25
    NHTSA ID Number: 10303457
26
    Incident Date January 2, 2009
    Consumer Location RONKONKOMA, NY
27
    Vehicle Identification Number 1FTSW21P15E****
    Summary of Complaint
28
    CRASHNo
                                         -70-
    Class Action Complaint
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FIRENo
 1
   INJURIES0
2
   DEATHS0
   I CURRENTLY OWN A FORD F 250 PICKUP TRUCK, WHEN I AM DRIVING 40 TO 50 MPH MY
3
   TRUCK STARTS TO SHACK VIOLENTLY. I HAVE READ MANY FORUMS ON THIS AND
4
    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? MUST
5
    SOMEBODY GET HURT OR WORSE KILLED DUE TO FORDS NEGLECT OF THIS
    PROBLEM? *TR
6
    1 Affected Product
7
8
   July 8, 2010 NHTSA ID NUMBER: 10341943
    Components: SUSPENSION
9
   NHTSA ID Number: 10341943
10
   Incident Date July 7, 2009
    Consumer Location MANASQUAN, NJ
11
    Vehicle Identification Number N/A
12
   Summary of Complaint
    CRASHNo
13
   FIRENo
   INJURIES0
14
   DEATHS0
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
   BRAND NEW. IT IS DEALER MAINTAINED AND THE TIRES HAVE BEEN ROTATED AND
17
    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
    THE CORRECT PRESSURE. I HAVE COMPLAINED ABOUT THIS VERY DANGEROUS
19
    SITUATION BEFORE AND HAVE BEEN GIVEN LAME EXCUSES BY BOTH THE NHTSA AND
   FORD. PLEASE LET ME SAY THIS AGAIN. THIS IS NOT A SHAKE IN THE FRONT END.
20
    THIS IS A VERY VIOLENT REACTION WHEN THE TRUCK HITS A BUMP. THE TRUCK MUST
21
    ALMOST BE BROUGHT TO A STOP IN ORDER TO STOP THE TRUCK FROM SHAKING.
    WHEN THIS HAPPENS ON A HIGHWAY IT BECOMES VERY DANGEROUS BECAUSE THE
22
    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
23
    HOLD ON TO THE STEERING WHEEL. ANYONE DRIVING ALONGSIDE OR BEHIND THE
24
    TRUCK IS IN DANGER WHEN THIS OCCURS. I KNOW THERE HAS BEEN OTHER
   COMPLAINTS OF THE SAME THING HAPPENING WITH THE F-250. THIS IS SOMETHING
25
   THAT SHOULD NOT BE IGNORED OR TAKEN LIGHTLY. SOMEONE WILL
    EVENTUALLY DIE OR BE SERIOUSLY INJURED DUE TO THIS DEFECT. PLEASE DO
26
    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
   DRIVING RECORD. *TR
28
    1 Affected Product
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-71-

Class Action Complaint

1 2 July 31, 2010 NHTSA ID NUMBER: 10346501 **Components: SUSPENSION** 3 NHTSA ID Number: 10346501 4 **Incident Date July 30, 2010** Consumer Location LAUDERHILL, FL 5 Vehicle Identification Number 1FTSW21595E**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** I RECENTLY PURCHASED A FORD 2005 F250 SUPER DUTY TRUCK. WHILE DRIVING ON 9 THE HIGHWAY AT 70 MPH, I HIT AN UNEVEN SPOT ON THE ROAD THAT CAUSED THE 10 FRONT END TO WOBBLE VIOLENTLY. I FELT I COULD NOT CONTROL THE TRUCK AND HAD TO APPLY THE BRAKES IMMEDIATELY. LUCKILY THERE WERE NO OTHER CARS 11 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 TRAVELING AT 60 – 65 MPH AND HIT ANOTHER ROUGH SPOT ON THE ROAD. THIS IS A 13 MAJOR SAFETY HAZARD THAT NEEDS TO BE RESOLVED BEFORE SOMEONE IS KILLED. I RESEARCHED THE PROBLEM ON THE INTERNET AND DISCOVERED THIS HAS 14 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. THE FORD MOTOR COMPANY IS AWARE OF THE PROBLEM AND BLAMES THE WOBBLE 16 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 17 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 AFTER ENCOUNTERING A POT HOLE OR AN UNEVEN ROAD SURFACE. *TR 19 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** Consumer Location HENDERSON, NV 24 Vehicle Identification Number 1FTSW21P65E**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHSO** 2005 FORD F-250 SUPER DUTY, 69,000 MILES. TRAVELING APPROX 65 MPH, HIT A SMALL 28 BUMP IN THE HIGHWAY AND THE FRONT SUSPENSION STARTED TO SHAKE -72-Class Action Complaint

UNCONTROLLABLY. I VERY NEARLY LOST COMPLETE CONTROL OF THE TRUCK, THIS 1 NEVER HAPPENED BEFORE, BUT HAS HAPPENED TWICE SINCE. THE TIRE PRESSURE 2 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, 3 DID NOT RESOLVE THE PROBLEM. TALKED TO THE FORD DEALER AND THEY DENIED 4 ANY KNOWLEDGE OF A SIMILAR PROBLEM. AFTER A FEW HOURS RESEARCH ONLINE, THIS PROBLEM IS WELL DOCUMENTED AND FREQUENT WITH THE FORD SUPER DUTY 5 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 6 REMEDIES. THE NHTSA ALSO KNOWS OF THE PROBLEM. I VIEWED FOUR NHTSA VIDEOS 7 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 8 NEEDS TO BE ACKNOWLEDGED AND CORRECTED BEFORE SOMEONE IS KILLED. *TR 9 **1 Affected Product** 10 11 January 10, 2012 NHTSA ID NUMBER: 10443382 12 Components: SUSPENSION, STEERING, SERVICE BRAKES, HYDRAULIC NHTSA ID Number: 10443382 13 **Incident Date** November 28, 2011 Consumer Location POTTSVILLE, PA 14 Vehicle Identification Number 1FTSW215X5E**** 15 **Summary of Complaint CRASHNo** 16 **FIRENo INJURIES0** 17 **DEATHSO** 18 WHILE DRIVING ON PA INTERSTATE 81, MY 2005 F250 EXPERIENCED SEVERE DRIVING LOSS OF CONTROL WHEN THE FRONT SUSPENSION TRAVELED OVER AN AREA OF THE 19 ROAD THAT WAS UNEVEN. THIS CAUSED THE TRUCKS INTERIOR AND EXTERIOR TO SHAKE UNCONTROLLABLY FOR A LONG PERIOD OF TIME TO THE EXTENT THAT THE 20 VEHICLE WAS SHIFTING INTO THE OTHER LANE OF TRAFFIC. DECELERATING BY 21 RELEASING THE GAS PEDDLE DID NOT IMMEDIATELY STOP THE SEVERE VIBRATIONS AND APPLYING THE BRAKES SEEMED TO INCREASE THE PROBLEM. MY ENTIRE FAMILY 22 AND A NON-FAMILY MEMBER WAS IN THE VEHICLE AT THE TIME AND WE ALL FEARED FOR OUR LIVES. AFTER RESEARCHING THE INTERNET, THERE IS A VIDEO POSTED BY 23 ANOTHER FORD OWNER AND IS EXACTLY WHAT WE HAD EXPERIENCED TOO. 24 (HTTP://WWW.YOUTUBE.COM/WATCH?V=8EUO6F8RGT4&FEATURE=RESULTS VIDEO&P LAYNEXT=1&LIST=PLDCA2FF5512789E5A) IT IS KNOWN AS 'FORD F250 DEATH 25 WOBBLE', WHEN VIEWING THE VIDEO, THE DEATH WOBBLE BEGINS AROUND 1 MIN 30 SEC INTO THE VIDEO AND NEEDS TO BE SERIOUSLY ADDRESSED AND 26 CORRECTED TO PREVENT THIS FROM EVER RECURRING AGAIN BEFORE SOMEONE 27 IS KILLED OR HURT... *TR 1 Affected Product

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Class Action Complaint

Case No.

28

1 May 14, 2012 NHTSA ID NUMBER: 10458496 2 **Components: STEERING, SUSPENSION NHTSA ID Number:** 10458496 3 **Incident Date** May 15, 2008 4 Consumer Location GARDEN GROVE, CA Vehicle Identification Number 1FTSW21P95E**** 5 **Summary of Complaint CRASHNo** 6 **FIRENo** 7 **INJURIES0 DEATHS0** 8 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 9 IN THE ROAD, THE FRONT SUSPENSION STARTED TO SHAKE UNCONTROLLABLY. IT IS 10 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 11 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. 12 AFTER A FEW HOURS RESEARCH ONLINE, THIS PROBLEM IS WELL DOCUMENTED AND 13 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 APPEAR THAT FORD HAS OFFERED ANY REMEDIES. THE NHTSA ALSO KNOWS OF THE PROBLEM. I VIEWED FOUR NHTSA VIDEOS THAT DEMONSTRATED THE IDENTICAL 15 PROBLEM THAT I AM EXPERIENCING WITH MY TRUCK. I HAVE FOUND NO ACTION ON 16 THE PART OF THE NHTSA. THIS PROBLEM NEEDS TO BE ACKNOWLEDGED AND CORRECTED BEFORE SOMEONE IS KILLED. *JS 17 1 Affected Product 18 19 March 1, 2010 NHTSA ID NUMBER: 10315150 **Components: STEERING** 20 NHTSA ID Number: 10315150 21 **Incident Date** February 21, 2010 Consumer Location NORTH RICHLAND HILLS, TX 22 Vehicle Identification Number 1FTSW21P75E**** **Summary of Complaint** 23 **CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** I HAVE A FORD F250 SUPER DUTY. AFTER HITTING A SMALL DIP IN THE ROAD, MY 26 STEERING COLUMN SHOOK VIOLENTLY, BACK AND FORTH. I WAS TRAVELING ONLY 30 27 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 28 LATER,, THE SAME THING HAPPENED AGAIN. IF I WAS TRAVELING ANY FASTER, I -74-

Class Action Complaint

TRULY BELIEVE I WOULD HAVE LOST CONTROL. I HAVE BEEN DRIVING FIRE 1 APPARATUS FOR OVER 29 YEARS. AND I KNOW SOMETHING IS WRONG HERE. PLEASE 2 DO SOMETHING BEFORE SOMEONE IS SERIOUSLY HURT OR KILLED. I DO NOT TRUST FORD. *TR 3 1 Affected Product 4 5 June 13, 2009 NHTSA ID NUMBER: 10273718 Components: SUSPENSION, STEERING 6 NHTSA ID Number: 10273718 7 **Incident Date June 13, 2009** Consumer Location WEST PITTSTON, PA 8 Vehicle Identification Number 1FTNF21535E**** **Summary of Complaint** 9 **CRASHNo** 10 **FIRENo INJURIES0** 11 **DEATHS0** 12 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 13 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 14 THIRD TIME I HAVE LOST CONTROL OF THE TRUCK BECAUSE OF THIS VIOLENT 15 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. 16 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 17 ANY FORD TRUCK. OBVIOUSLY, THEY ARE AWARE OF THE PROBLEM. I ONLY HOPE 18 THERE IS A RECALL BEFORE TOO MANY PEOPLE DIE. *TR 1 Affected Product 19 20 October 12, 2011 NHTSA ID NUMBER: 10429550 21 **Components: SUSPENSION** NHTSA ID Number: 10429550 22 **Incident Date** October 8, 2011 23 Consumer Location TWINSBURG, OH Vehicle Identification Number 1FTSX21555E**** 24 **Summary of Complaint CRASHNo** 25 **FIRENo** 26 **INJURIES0 DEATHSO** 27 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. 28 AFTER DOING SOME RESEARCH I HAD FOUND THAT THIS IS A ON GOING PROBLEM -75-Class Action Complaint

WITH THE FORD SD TRUCKS. SOMETHING HAS TO BE DONE OR SOMEONE IS GOING 1 TO GET KILLED DUE TO A BAD ACCIDENT. EVERY DEALER THAT I TALK TO HAS 2 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 3 1 Affected Product 4 5 June 2, 2014 NHTSA ID NUMBER: 10595469 **Components: SUSPENSION** 6 NHTSA ID Number: 10595469 7 Incident Date May 29, 2014 Consumer Location VEEDERSBURG, IN 8 Vehicle Identification Number 1FTSX21505E**** 9 **Summary of Complaint CRASHNo** 10 **FIRENo INJURIES0** 11 **DEATHS0** 12 HIT A BUMP GOING ACROSS A BRIDGE ON I-74. THE ENTIRE TRUCK BEGAN TO SHAKE VIOLENTLY FOR SEVERAL HUNDRED FEET BEFORE I REGAINED CONTROL OF THE 13 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 14 ANY NARROWER I WOULD NOT BE HERE TODAY. THIS HAPPENED AGAIN TWO DAYS 15 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. THIS 16 "SHIMMY " IS GOING TO GET PEOPLE KILLED. *TR 1 Affected Product 17 18 May 13, 2008 NHTSA ID NUMBER: 10227684 19 Components: SUSPENSION, STEERING 20 NHTSA ID Number: 10227684 **Incident Date** May 10, 2008 21 Consumer Location FORT WORTH, TX Vehicle Identification Number 1FTWW31P65E**** 22 **Summary of Complaint** CRASHNo 23 **FIRENo** 24 **INJURIES0 DEATHS0** 25 I HAVE A 2005 FORD F350 SUPER DUTY, WITH DANGEROUS FRONT END PROBLEMS. 26 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 27 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 28 STOP IS TO SLOW DOWN TO ABOUT 20MPH. VERY DANGEROUS TO DO ON THE -76-Class Action Complaint

INTERSTATE!!! AFTER DOING SOME RESEARCH AND READING SOME OF THE ONLINE 1 FORUMS FOR FORD TRUCK OWNERS, I FIND THAT THIS IS A MAJOR PROBLEM AND 2 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 3 WITH NO PROBLEMS. HOWEVER, THIS PAST WEEKEND, IT DID THIS THREE TIMES 4 DURING A 10 MILE TRIP HOME FROM A RESTAURANT. THIS IS A MAJOR PROBLEM THAT FORD MOTOR CO. SHOULD BE RESPONSIBLE FOR CORRECTING. IF SOMETHING IS NOT 5 DONE SOON MANY PEOPLE COULD GET HURT, AND GOD FORBID, BE KILLED. *TR **1 Affected Product** 6 7 May 28, 2009 NHTSA ID NUMBER: 10270151 8 **Components: SUSPENSION** 9 NHTSA ID Number: 10270151 **Incident Date** April 5, 2009 10 Consumer Location BEND, OR Vehicle Identification Number 1FTWW31P95E**** 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHSO** 14 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 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 OPINION COULD CAUSE A HEAD ON COLLISION. I HAVE SPOKEN TO THE FORD 17 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. WHICH THEY SAY USUALLY HELPS THIS PROBLEM. THIS IS OBVIOUSLY A DESIGN 19 FLAW BY FORD, AND THEY ARE DRAGGING THEIR FEET BECAUSE THEY DON'T WANT TO ADMIT THE PROBLEM OR PAY FOR THEIR MISTAKE. SOMEONE WILL SURELY BE 20 KILLED, DUE TO THIS PROBLEM, AND THE GOVERNMENT NEEDS TO TAKE STEPS TO 21 MAKE SURE THESE TRUCKS ARE FIXED BY FORD AT FORD'S EXPENSE. THIS IS NOT JUST A PROBLEM FOR MY TRUCK, BUT IS APPARENTLY AN EPIDEMIC, SOMEONE NEEDS TO 22 DO THEIR JOB AND SEE THAT THIS IS CORRECTED. *TR 1 Affected Product 23 24 June 7, 2007 NHTSA ID NUMBER: 10192728 25 **Components: STEERING** 26 NHTSA ID Number: 10192728 **Incident Date** May 18, 2007 27 **Consumer Location** Unknown Vehicle Identification Number 1FTWW33P05E**** 28 **Summary of Complaint**

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Class Action Complaint Case No.

CRASHNo 1 **FIRENo** 2 **INJURIES0 DEATHSO** 3 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 INVOLVED MANY. THIS HAS HAPPENED ON MANY OCCASIONS AND I HAVE TO SLOW 6 DOWN AND STOP BEFORE IT SUBSIDES. I HAVE BEEN TO SEVERAL DEALERS AND THEY 7 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. I 8 HAVE SPOEKN WITH MANY FOR SUPERDUTY OWNERS THAT HAVE HAD THIS PROBLEM AND THEY ALL SAY THE SAME THING. THIS IS NOT ONLY A PROBLEM 9 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 THE PROBLEM. FORD DIDN'T START REPLACING TIRES ON TRUCKS AND SUV'S BEFORE 11 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 12 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 STILL PRODUCES THESE AND SELLS THEM TO CONSUMERS AND DOESN'T FIX THEM. 14 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 Consumer Location CLINTON, NC 19 Vehicle Identification Number 1FTWW33P35E**** **Summary of Complaint** 20 **CRASHNo** 21 **FIRENo INJURIES0** 22 **DEATHSO** 2005 F350 DIESEL DUALLY THIS VEHICLE NEEDS TO BE RECALLED! THE LETTER THAT 23 FORD SENT TO OWNERS IS NOT ACCURATE! IT IS NOT THE TIRE PRESSURE OF THE 24 VEHICLE CAUSING THE SEVERE SHAKE! MY WHOLE TRUCK SHOOK PROFUSELY! IT WAS OUITE 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 OR GOING A AROUND A CURVE ON THE HIGHWAY AT 65MPH AND IF THERE IS A BUMP 26 IN THE ROAD ON THE CURVE THE ENTIRE TRUCK SHAKES PROFUSELY. RECEIVED A 27 LETTER FROM FORD STATING IT WAS TIRE PRESSURE BUT MY TIRE PRESSURE IS PERFECT. THIS IS A DEFECT THAT NEEDS TO BE RECALLED IMMEDIATELY STEERING 28 BOX ROCKER ARM TIRE ROD SOMETHING BUT THIS TRUCK IS NOT RIGHT. I HAUL A

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Class Action Complaint

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40FT TRAILER AND IF I HAD BEEN HAULING IT I WOULD BE DEAD ALONG WITH
 1
    SEVERAL OTHER CARS I WOULD WIPED OUT PLEASE GET THIS VEHICLE
2
    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
3
    COST OF FORD AND THIS DEFECT NEEDS TO BE RECALLED! PLEASE TAKE THIS
   COMPLAINT SERIOUSLY. SOMEONE WILL BE KILLED LIKE THIS. *TR
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    1 Affected Product
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6
    November 16, 2010 NHTSA ID NUMBER: 10366399
7
    Components: SUSPENSION, STEERING
   NHTSA ID Number: 10366399
8
   Incident Date November 15, 2010
9
   Consumer Location EUGENE, OR
    Vehicle Identification Number 1FTWW31PX5E****
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    Summary of Complaint
   CRASHNo
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   FIRENo
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   INJURIES0
   DEATHSO
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   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
14
    AT 75. SCARED ME TO DEATH. MY BRAKES DON'T WORK WHEN IT HAPPENS AND I
15
   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
16
    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
    I HAD A LOCAL 4X4 GUY TELL ME THAT I NEED TO REPLACE THE STEERING
18
   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
19
    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
20
    ABOUT. THERE IS A GUY ONLINE WHO SELLS AN AFTERMARKET STABILIZER SYSTEM
21
   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.
22
    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
23
    YEARS AND MODELS AROUND IT ARE DESCRIBING THE SAME ISSUE. I AM SCARED TO
24
    DRIVE IT. THE SHAKING IS EXTREMELY VIOLENT AND I AM LUCKY THAT THE
    TRUCK HAS BEEN ON A STRAIGHTAWAY WITH NO CARS AROUND ME EACH TIME
25
    ITS HAPPENED....OTHERWISE I COULD HAVE FLIPPED IT AND KILLED MYSELF OR
    SOMEONE ELSE OR SOMEONE DEAR TO YOU... PLEASE LOOK INTO THIS AND SEE
26
    THE STORIES ON THE WEB ABOUT PEOPLE WHO HAVE
27
    INJURED THEMSELVES AND OTHERS DUE TO THIS PROBLEM. SOMETHING HAS TO
    BE DONE. *TR
28
    1 Affected Product
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Class Action Complaint

1 2 September 8, 2011 NHTSA ID NUMBER: 10424388 **Components: STEERING, SUSPENSION** 3 NHTSA ID Number: 10424388 4 **Incident Date** May 8, 2011 Consumer Location DIXON, CA 5 Vehicle Identification Number 1FTWW31P85E**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** 9 WHILE DRIVING AT HIGHWAY SPEEDS, BUMPS IN THE ROAD SURFACE CAUSE A VIOLENT SHIMMY. TRUCK HAS STOCK SUSPENSION AND OEM TIRES. TIRE PRESSURE IS 10 PER FORD SPECIFICATION (AS INDICATED ON THE DOOR PILLAR). SEEMS NTSB HAS INVESTIGATED AND DETERMINED THE ISSUE IS DUE TO SUSPENSION MODIFICATIONS 11 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 **INJURED OR KILLED.** *TR 13 1 Affected Product 14 15 September 9, 2007 NHTSA ID NUMBER: 10202327 **Components: SUSPENSION** 16 NHTSA ID Number: 10202327 **Incident Date** September 9, 2007 17 Consumer Location HUNTINGTON BEACH, CA 18 Vehicle Identification Number 1FTSW21P96E**** **Summary of Complaint** 19 **CRASHNo** 20 **FIRENo INJURIES0** 21 **DEATHS0** I PURCHASED A FORD F250 FROM A DEALERSHIP, I BELIEVE AFTER DOING MY 22 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 POINT WHERE WE FEEL WE ARE GOING TO TIP OVER. WE HAVE TO COME TO A 24 COMPLETE STOP FOR IT TO STOP SHAKING AND WHEN YOU ARE ON A FREEWAY THAT IS VERY DANGEROUS. FORD DOES NOT SEEM TO CARE ABOUT THIS ISSUE AND HAS 25 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 **DIE FOR FORD TO HANDLE IT.** I HAVE FOUND 1000'S OF PEOPLE WITH THE SAME 27 PROBLEM AND WANT TO KNOW IF THERE IS ANYTHING YOU CAN DO TO HELP US FIX THIS. *JB 28 **1 Affected Product** -80-Class Action Complaint Case No.

-81-

Class Action Complaint Case No.

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Class Action Complaint

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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
February 25, 2010 NHTSA ID NUMBER: 10314410
Components: SUSPENSION
NHTSA ID Number: 10314410
Incident Date February 13, 2010
Consumer Location MORGANTON, NC
Vehicle Identification Number N/A
Summary of Complaint
CRASHNo
FIRENo
INJURIES0
DEATHS0
INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA),
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
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
THE TRUCK WAS COMING APART AND HAD TO DODGE TRAFFIC AND GET TO THE
SHOULDER TO INSPECT THE TRUCK. AFTER FINDING NOTHING WRONG I CONTACTED
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
REFUSE TO LOOK ANY FURTHER. I STARTED RESEARCHING THIS ON THE INTERNET
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
ACCIDENTS AND PROBLEMS FORD REFUSES TO RECOGNIZE IN THE DESIGN OF THESE
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
HAVE TO PAY $40,000 FOR A TRUCK THAT HAS A DESIGN FLAW AND PAY FOR THE
FIX.OUT OF MY OWN POCKET AS WELL. A RECALL NEEDS TO BE DONE ON THESE
TRUCKS BEFORE PEOPLE GET KILLED, WHY SHOULD SOMEONE HAVE TO DIE FIRST
BEFORE FORD WILL DO ANYTHING. ANY HELP YOU CAN GENERATE ON THIS WOULD
BE AWESOME. "THIS IS NOT A TIRE PRESS PROBLEM, BUT RATHER A DESIGN FLAW."
YOUR REPORT SOUNDS LIKE YOU SIDE WITH MONEY INSTEAD OF CONSUMER SAFETY.
[XXX] *TR
1 Affected Product
September 3, 2010 NHTSA ID NUMBER: 10353642
Components: SUSPENSION, STEERING
NHTSA ID Number: 10353642
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Class Action Complaint Case No.

Summary of Complaint

CRASHNo

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INJURIES0

2 DEATHS0

3 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? DOES SOMEONE HAVE TO

DIE BEFORE FORD REALIZES THAT THERE IS A PROBLEM? *KB

8 Affected Product

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March 20, 2012 **NHTSA ID NUMBER: 10452381**

Components: STEERING, SUSPENSION

NHTSA ID Number: 10452381 Incident Date March 19, 2012

Consumer Location LINDEN, PA

Vehicle Identification Number N/A

14 | Summary of Complaint

CRASHNo

15 | FIRENo

INJURIES0

16 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

SEAM. THE TRUCK SHOOK SO BAD THAT THE CAR IN THE NEXT LANE RAN OFF THE

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 ISSUE.

SOMETHING DONE THERE ARE GOING TO BE ACCIDENTS. WE LIVE IN THE NORTHEAST

WHERE WE HAVE SNOW AND ICE WITH THE ROADS IN THAT CONDITION WE WOULD

HAVE NEVER BEEN ABLE TO CONTROL THE TRUCK IF WE WOULD HAVE BEEN ON ICE 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

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

WHEN THIS HAPPENS. WE ALMOST SIDESWIPED THE CAR NEXT TO US THANK

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

WE HAVE OWNED AT LEAST 0 F-130 TRUCKS AND 4 FORD EAPLOKERS SO TOU COUL

SAY WE ARE FORD PEOPLE. BUT I AM NOT SO SURE WE WILL STAY A FORD FAMILY

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

-84-

Class Action Complaint

DOES THE SAME THING. I KNOW YOU HAVE DISMISSED COMPLAINTS BEFORE BUT 1 SOMEONE IS GOING TO BE KILLED. THEN MAYBE SOMETHING WILL BE DONE BY 2 YOU OR FORD WHEN THAT HAPPENS IT IS A SHAME THAT IT TAKES A DEATH TO MAKE SOMEONE DO SOMETHING. *KB 3 **1 Affected Product** 4 5 March 14, 2016 NHTSA ID NUMBER: 10849567 Components: SUSPENSION, STEERING 6 NHTSA ID Number: 10849567 7 Incident Date March 13, 2016 Consumer Location HOUSTON, TX 8 Vehicle Identification Number 1FTSW21PX6E**** 9 **Summary of Complaint CRASHNo** 10 **FIRENo INJURIES0** 11 **DEATHS0** 12 PLEASE REOPEN THIS INVESTIGATION. EVERY PERSON THAT I KNOW WITH A FORD F250 4X4 HAS THIS PROBLEM ON OCCASION. YOUR FAILURE TO MAKE FORD FIX 13 WILL KILL SOMEONE. HOW MANY PEOPLE HAVE TO DIE? DATE INVESTIGATION OPENED: MAR 14, 2008 DATE INVESTIGATION CLOSED: MAR 31, 2009 NHTSA ACTION 14 NUMBER: EA08007 COMPONENT(S): SUSPENSION MY TRUCK HAS 60,000 MILES NOW 15 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 PROBLEM MANY TIMES, AND CONSTANTLY GET A "RUN-AROUND" THAT IT'S THE TIRES. MY TIRES ARE PROPERLY INFLATED. YESTERDAY, I WAS TRAVELLING ON 17 INTERSTATE 45 YESTERDAY AT 70 MPH'S AND TRAFFIC SUDDENLY SLOWED TO A 18 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 19 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 20 VIOLENTLY BOUNCING (IT BOUNCED SO VIOLENTLY IT BROKE A FOLDING DOWN TV 21 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 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 23 COMPLETE STOP < 15MPH. IN THE SAME TRUCK, I HAVE HAD THIS DEATH WOBBLE 24 **INCIDENT HAPPEN OVER 200 TIMES SINCE OWNING THE VEHICLE.** I HAVE EVEN HAD THIS SAME PROBLEM HAPPEN WHILE HAULING CAR'S ON CAR TRAILERS. IT IS 25 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 26

1 Affected Product

-85-

TSA DENIES ITS A REAL PROBLEM. BEFORE I PAY OUT THOUSANDS FOR A

AFTERMARKET SUSPENSION, I EXPECT FORD TO FIX THIS, THE CORRECT WAY.

Class Action Complaint

Case No.

27

28

1 December 18, 2006 NHTSA ID NUMBER: 10176370 2 **Components: SUSPENSION NHTSA ID Number:** 10176370 3 **Incident Date** December 15, 2006 4 Consumer Location YONKERS, NY **Vehicle Identification Number** 1FTSW21526E**** 5 **Summary of Complaint CRASHNo** 6 **FIRENo** 7 **INJURIES0 DEATHS0** 8 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-9 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 SLOW IT DOWN ENOUGH TO REGAIN CONTROL. THANK GOD IT HAS NOT KILLED 11 ANYONE YET (INCLUDING ME).IT COULD HAVE VERY EASILY WENT HEAD-ON IF THAT IS WHERE THE ROAD WAS HEADED. *JB 12 1 Affected Product 13 14 June 6, 2007 NHTSA ID NUMBER: 10192570 15 **Components: STEERING, SUSPENSION** NHTSA ID Number: 10192570 16 **Incident Date June 6, 2007** Consumer Location AUBURN, AL 17 Vehicle Identification Number 1FTSX21506E**** 18 **Summary of Complaint CRASHNo** 19 **FIRENo** 20 **INJURIES0 DEATHSO** 21 I OWN A 2006 F250 4*4 AND WHILE DRIVING AT SPEEDS IN EXCESS OF 60 MPH THE TRUCK SHAKES VIOLENTLY AND EVEN SWAYS FROM LANE TO LANE. WHEN 22 ENCOUNTERING ANY ROUGH PLACE IN THE ROADWAY. THIS IS A VERY VIOLENT SHAKING AND I HAVE BEEN FORTUNATE ENOUGH TO KEEP THE TRUCK FROM 23 WRECKING. THE SHAKING WILL NOT STOP UNTIL YOU HAVE SLOWN DOWN 24 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 25 PROBLEM. THIS TRUCK HAS DONE THIS SINCE DAY ONE AND WITH THE FACTORY TIRES AND THE NEW TIRES THAT I HAVE ON IT NOW. THIS PROBLEM NEEDS TO BE 26 ADDRESSED BEFORE SOMEONE IS KILLED IN AN ACCIDENT RESULTING FROM THE 27 **DEFECT IN DESIGN.** 1 Affected Product 28 -86-

Class Action Complaint

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1
    August 5, 2007 NHTSA ID NUMBER: 10198529
 2
    Components: SUSPENSION
    NHTSA ID Number: 10198529
 3
    Incident Date August 2, 2007
 4
    Consumer Location MARSHALLTOWN, IA
    Vehicle Identification Number 1FTSX21546E****
 5
    Summary of Complaint
    CRASHNo
 6
    FIRENo
 7
    INJURIES0
    DEATHS0
 8
    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
 9
    CONTROL VEHICLE AND SLOW DOWN TO UNDER 40 MPH OR LESS TO REGAIN
10
    CONTROL. THIS IS AN ACCIDENT WAITING TO HAPPEN. I AM A LARGE MAN 6'2"
    240LBS AND MY FEAR IS THAT MY WIFE OR SOMEONE OF A SMALLER STATURE BE
11
    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
12
    CONTINUALLY GETTING WORSE, BY THAT I MEAN EVERY DAY THIS PAST WEEK. *TR
13
    1 Affected Product
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15
    August 22, 2007 NHTSA ID NUMBER: 10200428
    Components: SUSPENSION
16
    NHTSA ID Number: 10200428
    Incident Date February 16, 2007
17
    Consumer Location HARRISON, OH
18
    Vehicle Identification Number 1FTSX21536E****
    Summary of Complaint
19
    CRASHNo
    FIRENo
20
    INJURIES3
21
    DEATHS0
    MY 2006 F-250 SHAKES VIOLENTLY WHEN HITTING A POT HOLE THIS OCCURS ABOUT
22
    ONCE EVERY COUPLE OF WEEKS. I HAVE TO COME TO A COMPLETE STOP FOR THE
    VEHICLE TO OUIT SHAKING I HAVE ALMOST BEEN REARENDED SEVERAL TIMES AND I
23
    HAVE BEEN IN THE LANE ON ONCOMING TRAFFIC WITH MY 2-MONTH OLD IN THE
24
    VEHICLE BECAUSE I CAN NOT CONTROL THE VEHICLE WHEN THIS OCCURS. I HAVE
    HAD SEVERAL CLOSE CALLS AND HAVE BEEN EXTREMELY LUCKY THE
25
    CIRCUMSTANCES HAVEN'T BEEN DIFFERENT OTHERWISE THE SITUATION COULD
    OF BEEN FATAL FOR MY 2-MONTH OLD, MY HUSBAND AND MY SELF. *TR
26
    1 Affected Product
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28
    September 26, 2007 NHTSA ID NUMBER: 10204198
                                         -87-
    Class Action Complaint
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Components: SUSPENSION, STEERING 1 NHTSA ID Number: 10204198 2 Incident Date September 26, 2007 **Consumer Location** ALVARADO, TX 3 Vehicle Identification Number 1FTSW21P56E**** 4 **Summary of Complaint CRASHNo** 5 **FIRENo INJURIES0** 6 **DEATHS0** 7 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 8 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 9 COME TO A COMPLETE STOP ON THE FREEWAY. WE HAVE TRIED TO GET IT FIXED AT 10 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 11 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 12 AWARE OF THIS ISSUE, AND NOT RECALL THIS PROBLEM VEHICLE AS THERE ARE 13 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 14 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 15 FORD TO ADMIT THEIR TRUCKS ARE A HAZARD? HOW MANY PEOPLE ARE GOING 16 TO HAVE TO DIE OR BE SEVERELY INJURED BEFORE THEY ADDRESS THIS PRESSING ISSUE??? *TR 17 1 Affected Product 18 19 October 5, 2007 NHTSA ID NUMBER: 10205071 **Components: SUSPENSION** 20 NHTSA ID Number: 10205071 21 **Incident Date** October 4, 2007 Consumer Location SALT LAKE CITY, UT 22 Vehicle Identification Number 1FTSX21556E**** **Summary of Complaint** 23 **CRASHNo** 24 **FIRENo INJURIES1** 25 **DEATHSO** MY 2006 FORD F250 HIT A POT HOLD IN I-15 NEAR KAYSVILLE, SOUTHBOUND ON 26 THURS. OCTOBER 4, 2007. I WAS TRAVELING AT 65 MPH IN THE MIDDLE LANE WHEN IT 27 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 28 AND STOP. THIS HAS NOT BEEN THE FIRST TIME. THIS WAS THE EIGHTH TIME THIS HAS -88-

Class Action Complaint

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HAPPENED. THEN ABOUT TEN MINUTES LATER, ALMOST TO WORK, IT DID IT AGAIN ON
 1
   I-80 WESTBOUND ALMOST TO 5600 WEST. I HAVE TAKEN IT IN TO TWO DEALERS WHO
2
   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
3
   FRONT END. IT HAS SHOOK A LITTLE BUT NOW IS WORSE THAN EVER. I AM AFRAID TO
4
    DRIVE THIS VEHICLE ANY MORE AS IT WILL EITHER KILL ME OR ANOTHER
    DRIVER. I SUSTAINED A HEADACHE AND PULLED MUSCLE IN MY NECK AND A SORE
5
    BACK FROM YESTERDAYS INCIDENT. FORD NEEDS TO PULL THESE VEHICLES AND GET
    THEM REPAIRED OR REPLACED. *TR
6
    1 Affected Product
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8
    October 29, 2007 NHTSA ID NUMBER: 10207350
    Components: TIRES, SUSPENSION
9
    NHTSA ID Number: 10207350
10
   Incident Date October 29, 2007
    Consumer Location CHARLOTTE, NC
11
    Vehicle Identification Number 2FTDX08W5VC****
12
   Summary of Complaint
    CRASHNo
13
   FIRENo
   INJURIES0
14
   DEATHS0
15
   MY WIFE AND I WERE DRIVING MY 2006 F-250 SUPER DUTY ON HWY 95 WHEN MY
    TRUCK FELT LIKE I WAS IN AN EARTHQUAKE. IT WAS THE WORST VIOLENT SHAKING I
16
    HAVE EVER FELT IN A VEHICLE. IT FELT LIKE ALL FOUR TIRES EXPLODED. SO I
   FOUGHT MY STEERING WHEEL AND BRAKE PEDALS TO SLOW THE TRUCK DOWN TO
17
    FINALLY SKIDDED OFF OF THE SIDE OF THE ROAD, WHILE CARS ARE GOING BY US 70
18
   PLUS MILE PER HOUR, EVERYTHING INSIDE THE VEHICLE FELL OFF OF THE SEATS THE
    DRINKS IN THE CUP HOLDERS WENT FLYING. AFTER SEEING THAT ALL FOUR TIRES
19
    SEEMED FINE AND THAT WE DID NOT HIT ANYTHING ON THE ROAD, WE WERE SCARED
    TO DEATH TO DRIVE AGAIN. AFTER VISITED THE FORD DEALERSHIP THE NEXT DAY,
20
    THEY ARE STILL TRYING TO FIGURE OUT WHAT IS WRONG WITH THE VEHICLE, THEY
21
    SAID IT WAS THE TIRE BALANCE AND PRESSURE, BUT THERE IS NO WAY THIS WOULD
   CAUSE SUCH A VIOLENT DEATH SHAKING EXPERIENCE. AFTER DOING MY OWN
22
    RESEARCH, IT SEEMS THERE ARE THOUSANDS OF PEOPLE WITH THE FORD SUPER DUTY
   THAT ARE HAVING THIS SAME WORD FOR WORD PROBLEM. PLEASE HELP ME,
23
    BEFORE SOMEONE IS KILLED BY THIS FORD MISTAKE. I AM SCARED TO DEATH TO
24
    DRIVE MY BRAND NEW VEHICLE. THANK YOU VERY MUCH. *TR
    1 Affected Product
25
26
    November 5, 2007 NHTSA ID NUMBER: 10208006
27
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-89-

Components: SUSPENSION NHTSA ID Number: 10208006

Incident Date November 5, 2007

Class Action Complaint

Case No.

28

- Consumer Location PATASKALA, OH 1 Vehicle Identification Number N/A 2 **Summary of Complaint CRASHNo** 3 **FIRENo** 4 **INJURIES0 DEATHSO** 5 WHILE DRIVING HOME FROM WORK, I HIT A SMALL BUMP IN THE FREEWAY AT 65MPH 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 7 WHICH ONLY HAPPENED AFTER I GOT BELOW 15 MPH. AFTER PULLING OFF THE HIGHWAY, I GOT OUT TO CHECK WHICH TIRE HAD BLOWN AND TO MY SURPRISE ALL 8 WERE FINE. IF I HADN'T HAVE BEEN IN THE FAR RIGHT HAND LANE OF THE FREEWAY, I WOULD HAVE CAUSED AN ACCIDENT AND HURT EITHER MYSELF OR SOMEONE ELSE. 9 THIS WAS NOT A TYPICAL VEHICLE RESPONSE AND WAS VERY LITERALLY A VIOLENT 10 WHEEL HOP OR FRONT END SUSPENSION MALFUNCTION. I CONSIDER THIS TO BE A SERIOUS AND DANGEROUS ISSUE FOR F-250 OWNERS AND ALL WHO TRAVEL AROUND 11 THEM. FORD NEEDS TO RE-CALL THESE FRONT END DEFECTS BEFORE SOMEONE GETS KILLED. AFTER A THOROUGH SEARCH OF THE INTERNET, I DISCOVERED A 12 MOUNTAIN OF OTHER F-250 OWNERS WHO WERE AND ARE EXPERIENCING THE SAME 13 PROBLEM WITH SIMILAR RESULTS, MOST CLAIMING THE SAME THING, THESE VEHICLES HAVE A MAJOR LEAGUE PROBLEM WITH THE FRONT END SUSPENSION 14 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 15 1 Affected Product 16 17 February 14, 2008 NHTSA ID NUMBER: 10218089 18 **Components: SUSPENSION** NHTSA ID Number: 10218089 19 **Incident Date** February 13, 2008 Consumer Location PRIOR LAKE, MN Vehicle Identification Number 1FTSW21596E****
- 20
- 21 **Summary of Complaint**
- **CRASHNo** 22
- **FIRENo**
- **INJURIES0** 23
 - **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
- UNCONTROLLABLY WHEN A BUMP IS HIT. I HAVE HAD IT IN TO FORD DEALERSHIPS 7+ 26 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.
- HTTP://WWW.TOPIX.NET/FORUM/AUTOS/FORD-F-250-SUPER-28
 - DUTY/T0SGDCTMOBHE5JER1 THERE ARE OVER 170 SIMILAR COMPLAINTS REGARDING

-90-

Class Action Complaint

THE SAME PROBLEM. FORD DENIES THE PROBLEM EXISTS. IT WILL KILL SOMEONE 1 SOON, IT HAS ALMOST CASED 4 ACCIDENTS WITH MY TRUCK. *TR 2 1 Affected Product 3 4 June 6, 2008 NHTSA ID NUMBER: 10230092 **Components: SUSPENSION** 5 NHTSA ID Number: 10230092 **Incident Date** May 19, 2008 6 Consumer Location COLLEGEVILLE, PA 7 Vehicle Identification Number 1FTSX21596E**** **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHSO** SINCE NEW THE TRUCK HAS EXPERIENCED VIOLENT AND UNCONTROLLABLE FRONT 11 SUSPENSION SHAKING/BOUNCING/WOBBLING AFTER HITTING A SHARP BUMP AT 12 HIGHWAY SPEEDS. INITIALLY, THE SHAKING WOULD ONLY LAST APPROXIMATELY 3 SECONDS, BUT RECENTLY THE SHAKING WAS SO SEVERE THAT I HAD TO SLOW THE 13 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 14 IMMEDIATELY INSPECTED THE FRONT SUSPENSION AT THE NEXT EXIT. NOTHING 15 OBVIOUSLY BROKEN WAS EVIDENT. I SEARCHED THE INTERNET AND DISCOVERED THAT THIS IS A COMMON AND DANGEROUS PROBLEM WITH THESE TRUCKS. I DROPPED 16 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 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 20 HOPE THAT NHTSA CAN CONVINCE FORD TO CORRECT THE PROBLEM BEFORE 21 SOMEONE IS NEEDLESSLY KILLED. *TR 1 Affected Product 22 23 August 4, 2008 NHTSA ID NUMBER: 10236933 24 **Components: SUSPENSION** NHTSA ID Number: 10236933 25 **Incident Date** August 2, 2008 26 Consumer Location SELBYVILLE, DE Vehicle Identification Number 1FTSW21516E**** 27 **Summary of Complaint CRASHNo** 28 **FIRENo** -91-Class Action Complaint

INJURIESO DEATHSO

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2 I HAVE A 2006 FORD F250 WHICH WAS PURCHASED NEW. I HAVE MADE NO MODIFICATIONS TO THIS TRUCK SINCE PURCHASING IT ON12/07/2006. ON THREE 3 DIFFERENT OCCASSIONS MY TRUCK HAS BEGUN TO SHAKE VIOLENTLY WHILE 4 TRAVELING DOWN 195 SOUTH IN MARYLAND TO VISIT FAMILY. THE FIRST TWO TIMES THIS HAPPENED AFTER MAKING SURE I HAD CONTROL OF THE TRUCK I PUT IT IN 5 NEATRAL AND SHUT DOWN THE IGNITION. THE VIOLENT SHAKING STOPPED AND ALL SEEMED FINE. I HAD IT CHECKED AFTER THE SECOND TIME AND NOTHING WAS FOUND 6 TO BE WRONG. THE FIRST TIME THAT THIS ALL HAPPENED THERE WAS NO BUMP IN 7 THE ROAD OR ANYTHING, THE SECOND TIME I CROSSED A SMALL BRIDGE/OVERPASS AND AS I WAS COMING OFF THE VIOLENT SHAKING STARTED AND MY 5 AND 7 YEAR 8 OLDS THOUGHT I WAS PLAYING, I WAS SCARED BUT HELD ON AND TOLD THEM TO DO THE SAME. I SHUT THE TRUCK DOWN LIKE THE FIRST TIME AND IT WENT AWAY 9 AGAIN. MIND YOU NOW THIS IS ALL HAPPENING WHILE DRIVING DOWN INTERSTATE 10 95 AT ABOUT 70 MPH, STAYING WITH THE FLOW OF TRAFFIC, I HAVE TO LOOSE MY POWER STEERING AND POWER BRAKES WHILE THE TRUCK IS SHUT DOWN ROLLING 70 11 MPH. IS THIS NOT A SAFETY ISSUE, CAN ANYONE SAY RECALL BEFORE PEOPLE DIE. I TOOK THE TRUCK TO MY LOCAL FORD WHEN I GOT BACK TO HAVE IT CHECKED OUT. 12 THEY CHECKED, FOUND NOTHING AND WAS TOLD TO BRING IT BACK IF IT HAPPENED 13 AGAIN OR IF I COULD MAKE IT HAPPEN. MOST RECENTLY NOW IT HAPPENED AGAIN(3RD TIME) ON 8/2/2008, ONCE AGAIN ON 195. MY WIFE AND I WERE DRIVING AS 14 ALL TIMES BEFORE, WENT OVER SMALL BRIDGE/OVERPASS AND THE "DEATH WOBBLE" STARTED AGAIN. I KEPT MY FOOT ON THE ACCELERATOR AND BOTH HANDS 15 ON THE WHEEL TO SEE WHAT WAS GOING TO HAPPEN(MECHANIC AND I DISCUSSED 16 DOING THIS TO SEE IF A CODE. CHECK ENGINE LIGHT OR SOMETHING BROKE. AFTER

ABOUT 20-30 SECONDS OF RIDING THIS THING OUT IT ALL STOPPED AND WENT AWAY AS QUICKLY AND WITH OUT WARNING LIKE IT STARTS. I AM CURRENTLY TRYING TO GET ANYONE FROM FORD TO ACKNOWLEDGE THIS PROBLEM EXSISTS, WITH LITTLE

GET ANYONE FROM FORD TO ACKNOWLEDGE THIS PROBLEM EXSISTS, WITH LITTLE LUCK. *TR

1 Affected Product

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September 10, 2008 **NHTSA ID NUMBER: 10241663**

Components: SUSPENSION, STEERING

NHTSA ID Number: 10241663 Incident Date September 8, 2006 Consumer Location YUCAIPA, CA

Vehicle Identification Number 1FTSW21P16E****

25 | Summary of Complaint

CRASHNo

26 | FIRENo INJURIESO

DEATHS0

28 I HAVE A

I HAVE AN 06 F250. WHILE DRIVING AT APPROX. 40-45 SINCE I VE HAD THE TRUCK NEW I HAVE HAD MAJOR WOBBLE. YESTERDAY ON THE INTERSTATE I WAS DRIVING MY

-92-

Class Action Complaint

FAMILY BACK FROM DISNEYLAND AND HIT A POTHOLE AROUND 70MPH. THE TRUCK 1 SHOOK OUT OF CONTROL IT WAS ALL I COULD DO TO GET THE TRUCK TO THE 2 SHOULDER. I HAVE TAKEN THE TRUCK IN SEVERAL TIMES AND HAVE BEEN TOLD NO PROBLEMS. PLEASE DO SOMETHING BEFORE SOMEONE GETS KILLED. *TR 3 1 Affected Product 4 5 October 26, 2008 NHTSA ID NUMBER: 10246747 **Components: SUSPENSION** 6 NHTSA ID Number: 10246747 7 Incident Date January 10, 2006 **Consumer Location MABANK, TX** 8 Vehicle Identification Number N/A 9 **Summary of Complaint CRASHNo** 10 **FIRENo INJURIES0** 11 **DEATHS0** 12 I CURRENTLY DRIVE 84 TOYOTA PICKUP BECAUSE I AM TERRIFIED TO DRIVE MY 06 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 15 STATES THAT IT IS THE DAMPENER AND TIRE PRESSURE. OBVIOUSLY THEY DON'T UNDERSTAND WHAT VIOLENT SHAKING IS...IT IS NOT THE DAMPENER AND TIRE 16 PRESSURE....THE TRUCK WILL LITERALLY BOUNCE OUT OF ITS LANE OR OFF THE ROAD. IF FORD DOES NOT RESOLVE THIS PROBLEM, I AM SURE THAT MANY PEOPLE 17 WILL DIE WHILE DRIVING THESE. I BOUGHT THIS TRUCK BRAND NEW AND REFUSE 18 TO DRIVE IT.....GUESS 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** NHTSA ID Number: 10253393 22 **Incident Date** September 20, 2007 23 Consumer Location LAUREL, MD Vehicle Identification Number 1FTSX215X6E**** 24 **Summary of Complaint CRASHNo** 25 **FIRENo** 26 **INJURIES0 DEATHSO** 27 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 28 ONLY HAPPEN WHEN YOU GO OVER AN AREA OF THE ROAD THAT IS ROUGH. IT HAS -93-

Class Action Complaint

GOTTEN PROGRESSIVELY WORSE, I WAS DRIVING AT 60 MPH AND WENT OVER A 1 BUMPY AREA ON THE HIGHWAY AND I ALMOST LOST CONTROL OF THE TRUCK. IT 2 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 3 INTO ONCOMING TRAFFIC. I FOUND A SITE WHERE THERE WERE 11 OTHER 4 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 5 APPARENT THAT THERE IS SOMETHING WRONG WITH THE SUSPENSION SYSTEM THEY USED. IF SOMEONE IS DRIVING THAT HASN'T EXPERIENCED IT THEY MAY LOOSE 6 COMPLETE CONTROL OF THE VEHICLE AND CAUSE A FATALITY. I AM GOING TO 7 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 8 PROBLEM. *TR **1 Affected Product** 9 10 April 13, 2009 NHTSA ID NUMBER: 10265123 11 Components: STEERING, STRUCTURE, SUSPENSION, WHEELS 12 NHTSA ID Number: 10265123 Incident Date April 12, 2009 13 Consumer Location PITTSBURGH, PA Vehicle Identification Number 1FTNF21576E**** 14 **Summary of Complaint** 15 **CRASHNo FIRENo** 16 **INJURIES0 DEATHS0** 17 MY F-250 SUPER DUTY, HAS A SEVERE FRONT END SHIMMY AT HIGHWAY SPEED. MY 18 WIFE AND I COULD HAVE DIED IN ONE INSTANCE, WE HAD TO MOVE ACROSS TWO LANES TO THE SHOULDER AS THE TRUCK BOUNCED UNCONTROLLABLY. I 19 THOUGHT THE TIE RODS WERE GOING TO SNAP. THIS DID NOT HAPPEN JUST ONCE, BUT NUMEROUS TIMES. EVERY TIME I APPROACH A BRIDGE DECK, BUMP OR 20 POT HOLE I'M AFRAID THE TUCK MAY HAVE A UNCONTROLLABLE SHIMMY AND 21 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 22 BE RECTIFIED!!! JUST SO YOU ARE MADE AWARE MY TIRES ARE FINE AS IS MY SPEED. *TR 23 1 Affected Product 24 25 October 1, 2009 NHTSA ID NUMBER: 10285983 26 **Components: SUSPENSION** NHTSA ID Number: 10285983 27 **Incident Date** September 10, 2009 **Consumer Location STANLEY, NM** 28 Vehicle Identification Number N/A -94-

Class Action Complaint

```
Summary of Complaint
 1
    CRASHNo
2
    FIRENo
   INJURIES0
3
    DEATHSO
4
    WHEN I HIT A BUMP IN THE ROAD MY 2006 F250 4X4 STARTS SHAKING LIKE A TIRE IS
    FALLING OFF. I REPLACED THE STEERING STABILIZER AND SHOCKS WHICH FIXED IT
5
    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 I AM AFRAID THAT
6
    MY TRUCK IS GOING TO GO OFF THE ROAD OR IN ANOTHER LANE. IT JUST SITS
7
    BECAUSE I DON'T WANT TO KILL MYSELF OR SOMEONE ELSE AND I DON'T WANT
    TO SELL IT LIKE IT IS. *TR
8
    1 Affected Product
9
10
    October 7, 2009 NHTSA ID NUMBER: 10286629
    Components: SUSPENSION
11
    NHTSA ID Number: 10286629
12
    Incident Date October 6, 2009
    Consumer Location NORTH PORT, FL
13
    Vehicle Identification Number 1FTSW21P36E****
    Summary of Complaint
14
    CRASHNo
15
    FIRENo
    INJURIES0
16
    DEATHS0
    1. I OWN A 2006 FORD F250 SUPER DUTY TRUCK AND WHEN I HIT THE SMALLEST POT
17
    HOLE OR BUMP IN THE ROAD MY TUCK SHAKES VIOLENTLY TO THE POINT OF LOSING
18
    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
19
    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
20
    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.
    THIS IS A VERY DANGEROUS PROBLEM AND MAY END UP KILLING SOMEONE
23
    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
    Incident Date June 15, 2010
28
    Consumer Location WATERFORD, CT
                                          -95-
    Class Action Complaint
```

Vehicle Identification Number N/A 1 **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** I HAVE A 2006 FORD F-250 WITH THE 5.4L GAS MOTOR. SINCE NEW IT HAS NOT 5 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 6 EXTREMELY VIOLENT LEFT AND RIGHT SO MUCH SO IT SPILT MY COFFEE AND ALL 7 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 8 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 9 BEHIND ME DID NOT HIT ME THEN IT HAPPENED AGAIN THAT SAME DAY ABOUT TEN 10 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 11 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 12 BECAUSE I AM AFRAID TO GO ANYWHERE WITH IT. THIS SHAKING IS A VERY VIOLENT 13 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 14 LOOKING THROUGH THE TRUCK FORUMS I AM NOT EVEN CLOSE TO THE ONLY ONE WITH THE PROBLEM. THERE IS AN ISSUE HERE AND IT IS JUST A MATTER OF TIME 15 UNTIL SOME ONE GETS KILLED DUE TO IT IF SOME ONE HAS NOT BEEN KILLED 16 ALREADY. *TR 1 Affected Product 17 18 September 6, 2010 NHTSA ID NUMBER: 10354071 19 **Components: SUSPENSION** NHTSA ID Number: 10354071 20 **Incident Date** August 20, 2010 21 Consumer Location WINSTED, CT Vehicle Identification Number 1FTSX21586E**** 22 **Summary of Complaint CRASHNo** 23 **FIRENo** 24 **INJURIES0 DEATHSO** 25 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 26 IMMEDIATELY THE TRUCK,IT VEERED INTO THE NEXT LANE THANK GOD THERE WAS 27 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

-96-

GUARD RAILS. WE COULD HAVE EASILY ALL BEEN KILLED, THIS TRUCK HAS 40,000

Class Action Complaint

Case No.

28

ADULT DRIVEN MILES NO LIFT NO BIG TIRES NO OFF USE. THIS NEEDS TO BE 1 ADDRESSED BY FORD AND BE PUT IN THE MEDIA BEFORE SOME ONE IS KILLED. 2 **1 Affected Product** 3 4 September 28, 2010 NHTSA ID NUMBER: 10358161 5 **Components: SUSPENSION** NHTSA ID Number: 10358161 6 **Incident Date June 23, 2010** 7 Consumer Location BELLOWS FALLS, VT Vehicle Identification Number 1FTSX21566E**** 8 **Summary of Complaint CRASHNo** 9 **FIRENo** 10 **INJURIES0 DEATHS0** 11 I HAVE A 2006 F250 SUPERDUTY XLT, THE VEHICLE VIOLENTLY SHAKES IN THE FRONT 12 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, 13 AND LET OFF THE ACCELERATOR TO GAIN CONTROL WITHOUT BRAKING. I HAVE RECEIVED A LETTER FROM FORD REGARDING THIS ISSUE STATING TO CHECK TIRE 14 PRESSURE. I HAVE COMPLIED WITH THIS BUT STILL IS A FACTOR REGARDLESS. I DO 15 NOT HAVE THE EXTRA MONEY TO DO ANY EXPENSIVE UPGRADES OR REPAIRS. THIS IS A FORD ISSUE! THEY NEED TO FIX THIS PROBLEM BEFORE IT KILLS MANY PEOPLE. 16 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 17 GIVE A DATE BECAUSE IT HAPPENS ALL THE TIME! *TR 18 1 Affected Product 19 May 21, 2011 NHTSA ID NUMBER: 10403273 20 **Components: SUSPENSION** 21 NHTSA ID Number: 10403273 **Incident Date** May 15, 2011 22 **Consumer Location** Unknown 23 Vehicle Identification Number 1FTNF21516E**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** UPON HITTING BUMPS ON ROADWAY I LOST COMPLETE CONTROL OF TRUCK FOR 27 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 28 **OF MY KIDS** -97-Class Action Complaint

1 Affected Product 1 2 July 4, 2011 NHTSA ID NUMBER: 10410391 3 **Components: SUSPENSION** 4 **NHTSA ID Number:** 10410391 **Incident Date June 30, 2011** 5 Consumer Location CLEVELAND, OH Vehicle Identification Number 1FTSW21586E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 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 I 16 JUST GOT BACK FROM A 300 MILE TRIP THIS HAPPENED 8-10 TIMES AND IF TRAFFIC PATTERNS WERE ANY DIFFERENT THIS POTENTIAL RECALL WOULD HAVE KILLED 17 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 ENGINEERING FLAW WITHOUT ANY SUCCESS. *TR 19 1 Affected Product 20 21 September 15, 2011 NHTSA ID NUMBER: 10425534 Components: STEERING, SERVICE BRAKES, HYDRAULIC, SUSPENSION 22 NHTSA ID Number: 10425534 23 **Incident Date** October 13, 2005 Consumer Location WINTERSVILLE, OH 24 Vehicle Identification Number 1FTNF21506E**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** SHIMMY- THE SHIMMY PROBLEM THAT OCCURS IN THE 4X4 F250 SHOULD STILL BE A 28 SIGNIFICANT ISSUE FOR THOSE OF US THAT STILL OWN THESE TRUCKS. THE DEALER -98-Class Action Complaint

TRIED THE TIRE INFLATION STORY WITH ME, BUT THAT DID NOT CORRECT THE 1 PROBLEM. ROAD RACING SPORT CARS FOR MANY YEARS I KNOW THAT ONE POUND 2 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 3 ALIGNMENT SPECS. WELL AS WE ALL KNOW NOW THAT DID NOT FIX IT EITHER. THEN 4 THEY TOLD ME THAT THE TIRES BEING CUPPED WAS CAUSING THE SHIMMY, MY RESPONSE TO THAT WAS THAT IT WAS THE SHIMMY CAUSING THE TIRES TO CUP NOT 5 THE TIRES BEING CUPPED CAUSING THE SHIMMY, ALTHOUGH THE WORSE THE CUPPING, THE WORSE THE SHIMMY. AFTER INSISTING ON NEW TIRES AND THEN THE 6 NEW LINE UP SPECS, WE TRIED IT AGAIN. THEN 960 MILES LATER AND ONLY ROAD 7 DRIVING THE SAME CUPPING WAS HAPPENING AGAIN. THEN IT WAS THE DAMPENER AND ATTACH POINT THAT WAS THE PROBLEM. THEN 2 YEARS LATER CAME THE 8 LETTER ABOUT DECELERATING AND APPLYING THE BRAKES AND THEN ABOUT 45 MPH IT SHOULD FIX IT. I GUESS THAT WOULD BE OK UNTIL YOUR GOING DOWN THE 9 INTERSTATE AT 70 MPH WITH AN 18 WHEELER BEHIND YOU GOING 70 MPH. WOULD IT 10 BE OK AFTER WHAT COULD BE A SERIOUS AND POSSIBLY FATAL ACCIDENT THAT I COULD PULL OUT MY LETTER THAT I GOT FROM FORD AND TELL EVERYONE, 11 **SORRY BUT I DRIVE A FORD.** *KB

1 Affected Product 12

September 19, 2011 NHTSA ID NUMBER: 10426295 14

Components: SUSPENSION, STEERING

15 NHTSA ID Number: 10426295 **Incident Date** March 17, 2010 16

Consumer Location LAKEWOOD, CO

Vehicle Identification Number 1FTSX21P26E**** 17

Summary of Complaint

18 **CRASHNo**

13

19

22

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FIRENo

INJURIES0

20 **DEATHSO**

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

CAN'T BELIEVE SOMEONE HAS NOT DIED YET! IT'S NOT IF, BUT WHEN. A JOINT IN THE

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 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 26

PROBLEM. THIS SITE WAS ALREADY AWARE OF THE PROBLEM BECAUSE WHEN I WENT

TO SELECT THE "FAILED COMPONENTS", STEERING WAS ALREADY HIGHLIGHTED. THIS 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. HOW MANY

-99-

Class Action Complaint

COMPLAINTS OR DEATHS DOES IT TAKE BEFORE FORD IS HELD RESPONSIBLE FOR 1 THIS DEFECT? *KB 2 1 Affected Product 3 4 October 17, 2011 NHTSA ID NUMBER: 10430575 **Components: STEERING, SUSPENSION** 5 NHTSA ID Number: 10430575 Incident Date October 9, 2011 6 Consumer Location SIDNEY, OH 7 Vehicle Identification Number 1FTSW21566E**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHSO** DRIVING MY 2006 FORD F250 SUPER DUTY CREW CAB 4X4 AT HIGHWAY SPEED OF 70 11 MPH THE TRUCKS FRONT END BEGAN TO VIBRATE AND BOUNCE UNCONTROLLABLY 12 AFTER GOING OVER AN UNEVEN SECTION OF BRIDGE. THE VIBRATION WAS SO BAD I THOUGHT THE FRONT END OF THE TRUCK WAS GOING TO TEAR ITSELF APART. AS I 13 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. 14 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 MUCH QUICKER THAN BEFORE ONCE I DECREASED TO 45MPH. THIS ISSUE IS 17 RAMPANT ON THE VEHICLE REPORTING WEBSITES AND WILL EVENTUALLY GET 18 SOMEONE KILLED. I PRAY FORD DECIDES TO FINALLY INVESTIGATE AND OFFER SOME FACTUAL EVIDENCE AND A PERMANENT SOLUTION TO THE PROBLEM SO 19 MANY DRIVERS ARE EXPERIENCE WITH THESE TRUCKS.I LOVE MY FORD TRUCK BUT NOT AT THE COST OF LOSING MY LIFE OR CAUSE INJURY TO SOMEONE ELSE. 20 *TR 21 **1 Affected Product** 22 23 June 6, 2012 NHTSA ID NUMBER: 10460739 Components: STEERING, SUSPENSION 24 NHTSA ID Number: 10460739 **Incident Date June 6, 2012** 25 Consumer Location FRANKLIN, IN 26 Vehicle Identification Number 1FTSX21516E**** **Summary of Complaint** 27 **CRASHNo FIRENo** 28 **INJURIES0** -100-Class Action Complaint

DEATHS0 1 I HAVE BEEN HAVING THIS PROBLEM FOR ALMOST A YEAR NOW AND HAVE READ 2 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 3 IF YOU ARE OVER 55MPH. IF YOU ANRT EXPECTING IT TO HAPPEN AND IT IS THE 1ST 4 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 5 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 6 NEW TIRES, STRUTS CHECKED, BALL JOINTS CHECKED, AND REAR SUSPENSION 7 LOOKED AT. NOTHING IS WRONG ...THIS IS CLEARLY A FACTORY PROBLEM AND IT NEEDS TO BE TAKEN CARE OF BEFORE PEOPLE START DIEING FROM IT! IS FORD 8 GOING TO RAISE MY CHILDREN WHEN THIS MAKES ME WRECK AND DIE ... NO THEY ARE NOT SO THEY NEED TO GET THIS TAKEN CARE OF. REPORTS SAY THAT THEY HAVE 9 CHANGED THE SET UP ON NEWER HEAVY DUTY TRUCKS BECAUSE OF THIS SO WHY 10 AREN'T THEY TAKING CARE OF THE ONE'S THEY ALREADY SOLD TO THE PUBLIC! PLEASE HELP...YOU CAN FIND TONS OF INFO IF YOU SEARCH " DEATH WOBBLE OR 11 DEATH SHAKE! *TR **1 Affected Product** 12 13 October 28, 2010 NHTSA ID NUMBER: 10362821 14 **Components: SUSPENSION, TIRES** 15 NHTSA ID Number: 10362821 Incident Date October 26, 2010 16 Consumer Location ALPINE, UT Vehicle Identification Number 1FTWW31P86E**** 17 **Summary of Complaint** 18 **CRASHNo FIRENo** 19 **INJURIES0** 20 **DEATHSO** 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 UNTIL SLOWED DOWN. THE ENTIRE VEHICLE SHAKES TO THE POINT YOU FEEL IT WILL 22 COME APART. I WAS TRAVELING ON A HIGHWAY WHEN I EXPERIENCED THIS. I NEARLY CAUSED AN ACCIDENT. I'M TERRIFIED WHEN THIS WILL HAPPEN ON A ICY

23 ROAD. SOMEONE IS GOING TO GET KILLED. 3. NOTHING. APPARENTLY THERE IS NO

FIX AS IT IS UNKNOWN. FORD IS AWARE OF THE PROBLEM BUT REFUSES TO BE HELD RESPONSIBLE. VEHICLE INFORMATION: ? 2006 ? FORD ? F350 ?? ENTIRE FRONT

SUSPENSION COMPONENT? VIN - [XXX]? TIRES BFG ALL TERRAIN 325/65 R18.

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 26 5 U.S.C. 552(B)(6). *TR 27

2 Affected Products

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Class Action Complaint

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August 1, 2013 NHTSA ID NUMBER: 10533024
 1
    Components: SUSPENSION, STEERING
 2
    NHTSA ID Number: 10533024
    Incident Date August 1, 2013
 3
    Consumer Location CLINTON, TN
 4
    Vehicle Identification Number 1FTWX33P16E****
    Summary of Complaint
 5
    CRASHNo
    FIRENo
 6
    INJURIES0
 7
    DEATHSO
    OUR TRUCK EXPERIENCED A SEVERE, VIOLENT WOBBLE THAT STARTED AFTER
 8
    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
 9
    BEHIND US. THE SHAKING AND WOBBLE CONTINUED FOR ABOUT 20 SECONDS, AND
10
    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
11
    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 TRUCK. I
12
    CONSIDER THIS ISSUE VERY DANGEROUS, AND WONDER HOW MANY FOLKS MAY
13
    HAVE BEEN INJURED OR KILLED AS A RESULT OF THEIR TRUCK SUDDENLY
    BECOMING UNCONTROLLABLE, AS OURS DID. *TR
14
    1 Affected Product
15
16
    January 18, 2016 NHTSA ID NUMBER: 10820797
    Components: ELECTRONIC STABILITY CONTROL, SUSPENSION, STEERING
17
    NHTSA ID Number: 10820797
18
    Incident Date August 8, 2015
    Consumer Location SANDWICH, MA
19
    Vehicle Identification Number 1FTWW31566E****
    Summary of Complaint
20
    CRASHNo
21
    FIRENo
    INJURIES0
22
    DEATHSO
    FORD F-350 2006 COMPLAINT. WE HAVE EXPERIENCED VIOLENT SHAKING (SHIMMYING)
23
    WHEN THE TRUCK HITS A BUMP ON THE HIGHWAY AND AS A RESULT, EXTREME
24
    DIFFICULTY MAINTAINING THE VEHICLE ON THE ROAD. OUR FIRST EXPERIENCE WAS
    IN AUGUST 2015, ON THE INTERSTATE HIGHWAY WHILE TRAVELLING AT 75MP. WE HIT
25
    A BUMP AND THE TRUCK / STEERING WHEEL SHOOK VIOLENTLY FOR ABOUT 10
    SECONDS CAUSING US TO SWERVE ACROSS LANES AND STRUGGLE TO KEEP THE
26
    TRUCK IN THE LANE AND OUT OF TRAFFIC'S WAY. WE HAVE SINCE EXPERIENCED THIS
27
    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
28
    MECHANIC ADVISED THAT HE COULD NOT FIND ANYTHING WRONG. IT HAS BEEN A
                                        -102-
    Class Action Complaint
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1
    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
2
    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
3
    HAVE CALLED THE SERVICE CENTER FROM THE FORD DEALER WE BOUGHT THE
4
    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
5
    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
6
    RESULT IN FATAL ACCIDENTS IF THE SHAKING CANNOT BE CONTROLLED. ALSO,
7
    FORD SHOULD BE RESPONSIBLE FOR REPAIRING THE FAULTY TRUCKS.
    1 Affected Product
8
9
    September 30, 2010 NHTSA ID NUMBER: 10358378
10
    Components: STEERING
    NHTSA ID Number: 10358378
11
    Incident Date September 28, 2010
12
    Consumer Location CAMDEN, NJ
    Vehicle Identification Number N/A
13
    Summary of Complaint
    CRASHNo
14
    FIRENo
15
    INJURIES0
    DEATHS0
16
    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
17
    ABLE TO FIX THE ISSUE. PLEASE FORCE A RECALL BEFORE PEOPLE ARE KILLED.
18
    *TR
    1 Affected Product
19
20
    October 29, 2014 NHTSA ID NUMBER: 10651012
21
    Components: STEERING
    NHTSA ID Number: 10651012
22
    Incident Date February 5, 2013
23
    Consumer Location STOCKTON, CA
    Vehicle Identification Number N/A
24
    Summary of Complaint
    CRASHNo
25
    FIRENo
26
    INJURIES0
    DEATHSO
27
    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
28
    AND WOBBLE. IT IS EVEN WORSE ON A ROAD CURVE. IT IS VERY DANGEROUS TO
                                         -103-
    Class Action Complaint
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DRIVING ON THE FREEWAY IN THE MOUNTAINS. I FEW TIMES I ALMOST LOST 1 CONTROL. THE SHAKE DOES NOT GO AWAY UNTIL I SLOW DOWN BELOW 40MPH 2 WHICH CAUSES ANOTHER DANGEROUS SITUATION WHILE ON THE FREEWAY. I HAVE CHANGED TIRES, CHECKED PRESSURE AND ROTATED TIRES. ALSO, I REPLACED 3 STEERING DAMPENER. NOTHING HAS WORKED TO DIMINISH THE SHAKE. I ALSO HAD 4 THE 4 WHEEL ALIGNMENT CHECKED AND THE SHOP SHOWED ME THAT IT WAS CORRECT. THEY CHECKED EVERYTHING AND COULD NOT FIND ANYTHING THAT WAS 5 WORN OUT AND NEEDED CHANGING. I WAS TOLD NO REPAIRS NEEDED. THIS IS A VERY DANGEROUS SITUATION AND NEEDS TO BE CORRECTED BEFORE BODIES 6 **START PILING UP.** *TR 7 1 Affected Product 8 9 May 4, 2009 NHTSA ID NUMBER: 10267644 **Components: SUSPENSION** 10 NHTSA ID Number: 10267644 **Incident Date** February 17, 2007 11 Consumer Location SILOAM SPRINGS, AR 12 Vehicle Identification Number 1FTWW33P26E**** **Summary of Complaint** 13 **CRASHNo FIRENo** 14 **INJURIES0** 15 **DEATHSO** I AM DISAPPOINTED IN THE FINDINGS ON THE F-350 SUPERDUTY FRONT SUSPENSION 16 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 17 FORD WILL NOT WARRANTY IT BECAUSE OF THE FACTORY WARRANTY EXPIRING. 18 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 19 REALLY EXPECT THE VEHICLE OWNERS TO BUY THIS. LOOKS LIKE FORD HAD ITS HAND IN THIS ONE AGAIN. I WANT MY TRUCK FIXED AND I WILL NOT PAY FOR IT. 20 FORD KNOWS THIS PROBLEM EXIST BUT IS NOT LARGE ENOUGH YET TO RECALL. WILL 21 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 YEAR SO FAR SINCE PURCHASE AND AS OF MARCH OF THIS YEAR IT NEEDS IT AGAIN. 23 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 CHECK MY TIRE PRESSURE YOU WILL BE COMPLETELY SCARED BEFORE WE ARE 25 DONE. *TR **1 Affected Product** 26 27

28

August 14, 2011 NHTSA ID NUMBER: 10419336 **Components: SUSPENSION**

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Class Action Complaint Case No.

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1
    NHTSA ID Number: 10419336
    Incident Date July 17, 2011
2
    Consumer Location NOVATO, CA
    Vehicle Identification Number 1FTWW31P76E****
3
    Summary of Complaint
4
    CRASHNo
    FIRENo
5
    INJURIES0
    DEATHS0
6
    THIS HAS HAPPENED SEVERAL TIMES WHEN THE TRUCK IS TRAVELING ALONG A ROAD
7
    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
8
    THAT HAS BEEN PRESENTED TO FORD BY MANY AND IT IS JUST BEING IGNORED. THIS
    IS A TRUE DANGER AND MAY NOT ONLY KILL THE DRIVER AND PASSENGERS BUT
9
    ANYONE DRIVING DOWN THE ROAD. IT'S ALL OVER THE INTERNET AND HAPPENING
10
    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
11
    DO SOMETHING SO CONSUMERS CAN DRIVE THE VEHICLES THAT THEY HAVE
    PURCHASED, FOR MANY OVER $55,000. *TR
12
    1 Affected Product
13
14
    January 13, 2016 NHTSA ID NUMBER: 10820036
15
    Components: SUSPENSION
    NHTSA ID Number: 10820036
16
    Incident Date January 1, 2015
    Consumer Location CLEVELAND, SC
17
    Vehicle Identification Number 1FTWW33P56E****
18
    Summary of Complaint
    CRASHNo
19
    FIRENo
20
    INJURIES0
    DEATHSO
21
    DEATH SHIMMY. STEERING WHEEL SHAKES VIOLENTLY WHEN A BUMP OR
    DISCONTINUITY IN THE ROAD IS ENCOUNTERED. YOU CANNOT HOLD THE STEERING
22
    WHEEL DURING THIS EVENT. CURE IS TO REDUCE VEHICLE SPEED BELOW 15 MPH. THIS
    IS HAZARDOUS IF TRAVELING AT HIGH SPEED OR PULLING A TRAILER. AS YOU
23
    CANNOT HOLD THE WHEEL DURING THIS EVENT, THE VEHICLE WILL CHANGE LANES
24
    AND PRESENTS A FATAL HAZARD AS YOU ATTEMPT TO REDUCE SPEED FROM 65
    MPH TO BELOW 15 MPH WITHOUT STEERING CONTROL. FORD ACKNOWLEDGES THE
25
    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
26
    OCCURANCE OR SEVERITY. I HAVE REPLACED THE TIRES AND RUN UP THE PRESSURE
27
    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 ##
28
    1 Affected Product
                                        -105-
    Class Action Complaint
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1 2 January 30, 2012 NHTSA ID NUMBER: 10445958 **Components: STEERING** 3 NHTSA ID Number: 10445958 4 **Incident Date** May 25, 2011 Consumer Location BOWLING GREEN, KY 5 Vehicle Identification Number 1FTWW33P46E**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** I PURCHASED THE TRUCK USED MAY 2011. THE VERY DAY I PURCHASED THE TRUCK I 9 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 WOBBLE TO GET IT UNDER CONTROL I HAVE TO BREAK HARD AND COME ALMOST TO 11 A COMPLETE STOP. I HAVE HAD IT IN THE DEALERSHIP 3 TIMES I WAS TOLD THERE 12 WAS NOTHING WRONG WITH THE FRONT END, AND WAS TOLD TO ADJUST MY AIR PRESSURE LOWER, THEY ADJUSTED IT, IT CORRECTED NOTHING. I HAVE BEGAN TO 13 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 14 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 BECAUSE I KNOW SHE DOES NOT HAVE THE SKILLS TO CONTROL THIS. *TT 16 **1 Affected Product** 17 18 December 25, 2013 NHTSA ID NUMBER: 10557224 **Components: STEERING** 19 NHTSA ID Number: 10557224 20 **Incident Date** October 15, 2013 Consumer Location ANTIOCH, CA 21 Vehicle Identification Number 1FTWW31P46E**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** 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 TOLD THIS IS A NORMAL CHARACTERISTIC OF TRUCKS AND THAT THERE IS NO FIX? 27 WHAT IS THE NUMBER OF PEOPLE THAT MUST DIE BEFORE YOU ADDRESS THIS PROBLEM? THE TRUCK HAS NEW TIRES OF FACTORY SPECS. ?*TR 28 1 Affected Product -106-Class Action Complaint

```
1
 2
    April 3, 2015 NHTSA ID NUMBER: 10703474
    Components: STEERING, FUEL/PROPULSION SYSTEM, ENGINE
 3
    NHTSA ID Number: 10703474
 4
    Incident Date April 3, 2015
    Consumer Location TRIADELPHIA, WV
 5
    Vehicle Identification Number N/A
    Summary of Complaint
 6
    CRASHNo
 7
    FIRENo
    INJURIES0
 8
    DEATHS0
 9
    PURCHASED THIS VEHICLE LESS THAN A YEAR AGO AND WAS ORIGINALLY VERY
    PLEASED. SUDDENLY WE ARE NOW EXPERIENCING THE DEATH WOBBLE AS OTHER
10
    HAVE DESCRIBED. THE VIOLENT SHAKING OF THE FRONT END. THIS USUALLY OCCURS
    WHEN YOU ARE APPROACHING THE SPEED OF 60MPH. WE DO NOT HAVE TO HIT A
11
    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
    TRUCK, THINKING IT MAY BE A INJECTOR STICKING. NOPE, DIDN'T FIX THE PROBLEM.
14
    LIGHT NEVER WENT OFF. TOOK IT TO A DEALERSHIP, THEY TESTED IT AND CAME
15
    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
    NOT RECALL A VEHICLE THAT HAS A SERIOUS KNOWN PROBLEM. WE ARE STUCK WITH
17
    THIS TRUCK THAT IS NOT WORTH THE DAMN PAPER THE TITLE IS WRITTEN ON. IT IS
18
    TIRING OF READING ALL THESE SIMILAR COMPLAINTS AND NO ONE IS DEFENDING THE
    CONSUMERS. AT WHAT POINT, DOES THE MANUFACTURER NEED TO BE HELD
19
    RESPONSIBLE TO OWN UP TO THE FAULTY EQUIPMENT AND FIX THE PROBLEMS?
    WHEN MY CHILD IS KILLED BECAUSE OF THE INABILITY TO CONTROL THE
20
    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
    THE FUEL TANK DETERIORATED FOR NO REASON AND DESTROYED THE ENGINE.
22
    *TR
    1 Affected Product
23
24
    September 20, 2012 NHTSA ID NUMBER: 10476568
25
    Components: STEERING, SUSPENSION
26
    NHTSA ID Number: 10476568
    Incident Date September 12, 2012
27
    Consumer Location FRANKLIN, OH
    Vehicle Identification Number N/A
28
    Summary of Complaint
                                        -107-
    Class Action Complaint
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CRASHNo
 1
    FIRENo
2
    INJURIES0
    DEATHSO
3
    HIGH SPEED WHEEL OSCILLATION OCCURRED WHILE DRIVING THE SPEED LIMIT OF
4
    INTERSTATE 275 AROUND CINCINNATI, OHIO. I HIT A BUMP ON THE EXIT OF THE
    INTERSTATES BRIDGE AND THE STEERING WHEEL SHOOK REALLY BAD LEFT AND
5
    RIGHT. I HAD RECEIVED A LETTER LAST YEAR WARNING ME ABOUT THIS CONDITION. I
    DID NOT THINK I HAD A PROBLEM WITH THIS TRUCK UNTIL THIS HAPPENED. I WAS
6
    LUCKY THAT I DID NOT CRASH THIS VEHICLE WHEN THE OSCILLATION OCCURRED. I
7
    RESEARCHED THIS ON THE INTERNET AND SEVERAL OTHER OWNERS FOR THE F250
    HAVE HAD THE SAME PROBLEM. FORD NEEDS TO FIX THIS PROBLEM BEFORE
8
    SOMEONE GETS KILLED! *TR *JS
    1 Affected Product
9
10
    January 17, 2011 NHTSA ID NUMBER: 10376922
11
    Components: STEERING
12
    NHTSA ID Number: 10376922
    Incident Date December 17, 2010
13
    Consumer Location NORTH LAS VEGAS, NV
    Vehicle Identification Number 1FTNF21507E****
14
    Summary of Complaint
15
    CRASHNo
    FIRENo
16
    INJURIES0
    DEATHS0
17
    FORD SUPER DUTY DEATHWOBBLE. PROBLEM HAS PERSISTED SINCE NEW. FAILURE
18
    OCCURS AT SPEEDS BETWEEN 30 AND 75MPH. FAILURE MANIFESTS AS
    UNCONTROLLABLE STEERING AND WHOLE VEHICLE OSCILLATION. HAS LED TO LOSS
19
    OF CONTROL OF VEHICLE MORE TIMES THAN I CAN REMEMBER. UNEVEN ROAD
    SURFACE INSTIGATES SAID LOSS OF CONTROL. HAVE CHANGED SHOCKS AND
20
    SPRINGS, ADDED DUAL STEERING STABILIZER IN ADDITION TO CHANGING STABILIZER
21
    IN STOCK LOCATION, BALL JOINT CASTER CAMS ADDED, NEW TIRES ADDED (TWICE)
    MULTIPLE ALIGNMENTS. MOST CORRECTIVE ACTION TAKEN IS NOT TO DRIVE IT AND
22
    JEOPARDIZE MY LIFE OR THE LIVES OF OTHERS. HOW MANY NEED TO BE KILLED OR
    INJURED BEFORE SOMEONE CAN BE HELD ACCOUTABLE? *TR
23
    1 Affected Product
24
25
    February 22, 2014 NHTSA ID NUMBER: 10565456
26
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10565456
27
    Incident Date February 22, 2014
    Consumer Location MANCHESTER, MD
28
    Vehicle Identification Number 1FTWW31P27E****
                                        -108-
    Class Action Complaint
```

Summary of Complaint 1 **CRASHNo** 2 **FIRENo INJURIES0** 3 **DEATHSO** 4 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 5 ON THE TRUCK AND HAD TO DECELERATE AND MOVE TOWARDS THE SHOULDER. I RECEIVED AN INFORMATION BULLETIN FROM FORD ABOUT THIS POTENTIAL 6 "STEERING WOBBLE" AND MADE SURE TO CHECK OUT ALL OF THEIR 7 RECOMMENDATIONS. AFTER DOING SOME RESEARCH ONLINE I FEEL AS THOUGH THIS IS A MAJOR ISSUE AND FORD SHOULD BE DOING SOMETHING BEFORE MORE 8 PEOPLE ARE INJURED OR KILLED. THERE ARE SEVERAL ONLINE FORUMS ADDRESSING THIS ISSUE AND IT SEEMS AS THOUGH FORD IS NOT BEING HELD 9 RESPONSIBLE. *TR 10 **1 Affected Product** 11 12 October 15, 2010 NHTSA ID NUMBER: 10360616 Components: STEERING, SUSPENSION, EQUIPMENT 13 NHTSA ID Number: 10360616 **Incident Date** October 11, 2010 14 Consumer Location MANASSAS, VA 15 Vehicle Identification Number 1FTWW31P17E**** **Summary of Complaint** 16 **CRASHNo FIRENo** 17 **INJURIES0** 18 **DEATHS0** 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE 19 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 20 WOBBLE HAPPENS WHEN CROSSING UNEVEN PAVEMENT, CONCRETE, DIPS IN THE 21 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 22 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. 23 THEY TELL US TO REPLACE SHOCKS, STEERING DAMPERS, AND TIRES. I HAVE PUT TWO 24 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 25 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 26 FRONT TIRES. I HAD MY TIRES INSTALLED AND REBALANCED TWO TIMES AT THE 27 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 28 BOTTOM OF THIS BEFORE SOMEONE OR MORE PEOPLE GET HURT OR KILLED. THE

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Class Action Complaint

INTERNET IS FULL OF HORROR STORIES AS TO THIS PROBLEM. I FOR ONE AM READY 1 TO CONSULT LEGAL HELP. I JUST SPOKE WITH FORD CUSTOMER SERVICE (COMPLAINT 2 #[XXX]) AND ONCE AGAIN THEY SAID TAKE IT TO ANOTHER DEALER AND MAYBE I'LL HAVE BETTER LUCK.????? PLEASE HELP AND RESPOND.[XXX] INFORMATION 3 REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 4 552(B)(6) 1 Affected Product 5 6 June 28, 2012 NHTSA ID NUMBER: 10463493 7 Components: STEERING, SUSPENSION **NHTSA ID Number:** 10463493 8 **Incident Date June 16, 2012** Consumer Location WALLINGFORD, PA 9 Vehicle Identification Number 1FTWW31597E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 SHAKING SO BAD THAT IT RIPPED THE STEERING WHEEL OUT OF MY HAND. I HAD TO 15 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 16 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 17 STEERING WHEEL SO I CAN HOLD ON BETTER WHEN IT HAPPENS. LOOK ON LINE THIS 18 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 19 FORD PAY FOR A PROPER FIX BEFORE SOMEONE GETS KILLED. *TR **1 Affected Product** 20 21 October 5, 2010 NHTSA ID NUMBER: 10359276 22 **Components: STEERING, SUSPENSION** 23 NHTSA ID Number: 10359276 **Incident Date** September 15, 2010 24 Consumer Location MORGANTOWN, WV Vehicle Identification Number 1FTSX21518E**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHS0** 28 -110-

Class Action Complaint

1 I HAVE A 2008 FORD F250 5.4L V8 GAS TRUCK THAT I PURCHASED NEW, I HAVE LESS 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 3 THOUGH IT IS GOING TO SHAKE APART AND YOU CAN NOT STEER THE TRUCK AT ALL 4 UNTIL YOU SLOW TO AROUND THIRTY MILES AN HOUR. THIS IS VERY DANGEROUS AS YOU CAN NOT MAINTAIN LANE CONTROL AND OFTEN DRIFT INTO THE OTHER LANE 5 OR EMERGENCY PULL OFF LANE. THE TRUCK IS COMPLETELY STOCK AND HAS THE FACTORY TIRES, RIMS EVERYTHING... I HAVE HAD ALL SERVICE DONE AT THE LOCAL 6 FORD DEALERSHIP GARAGE WHERE I BOUGHT THE TRUCK. I HAVE TAKEN IT IN 7 NUMEROUS TIMES AND EACH TIME THEY ATTRIBUTED THE PROBLEM TO LOW TIRE PRESSURE, EVEN THOUGH IT WAS EXACTLY 75 PSI AS IS THE RECOMMENDATION ON 8 THE DOOR STICKER. SOMEONE IS GOING TO BE KILLED IN ONE OF THESE TRUCKS. THE DEALER REFUSES TO ACKNOWLEDGE THE PROBLEM. TO REPLICATE THE "DEATH 9 WOBBLE", ALL YOU HAVE TO DO IS DRIVE AN 08' SUPER DUTY AT 65-70 MPH ON THE 10 INTERSTATE AND HIT A SLIGHT BUMP OR MINOR POTHOLE, ESPECIALLY IN A SLIGHT TURN, AND YOU WILL LOSE CONTROL AND BE SHAKEN VIOLENTLY UNTIL YOU CAN 11 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 12 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 14 OFF. I SPENT ALOT OF HARD EARNED MONEY ON THIS TRUCK TO BE TOLD IT IS A TIRE INFLATION ISSUE WHEN IT IS DEFINITELY MUCH MORE SEVERE. I RELIGIOUSLY CHECK 15 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 DRIVING... APPROX 15,000 MILES. SOMETHING IS VERY WRONG, LIVES ARE AT RISK 17 HERE. PLEASE DO SOMETHING. RECALL *TR 1 Affected Product 18

19

20

28

July 1, 2014 NHTSA ID NUMBER: 10607347 Components: STEERING, SUSPENSION

21 NHTSA ID Number: 10607347

22 | Incident Date June 10, 2014

Consumer Location NEW BRAUNFELS, TX

23 | Vehicle Identification Number 1FTSW21R38E****

Summary of Complaint

24 CRASHYes

25 | FIRENO

INJURIES0

26 | **DEATHS0**

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

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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Class Action Complaint

1 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 2 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 3 LOOKED IN THE WHEEL HUB AND UNDERNEATH BUT DID NOT SEE ANYTHING OUT OF 4 THE ORDINARY FROM PLANE SIGHT. I EXPERIENCED THE VIOLENT SHAKING ON MULTIPLE OCCASIONS, DIFFERENT LOCATIONS AND FOUND MYSELF EXPERIENCING IT 5 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 6 HAVE THE REPAIR & DIAGNOSES. THE NEXT DAY 6/27/14 WE HAD TO EVACUATE OUR 7 JOB SITE IN LOUISIANA DUE TO EXTREME WEATHER CONDITIONS AND POSSIBLE TORNADOS, ON MY COMMUTE HOME, THE SO CALLED DEATH WOBBLE OCCURRED 8 AGAIN AND THIS TIME RESULTED IN LOOSING CONTROL AND CRASHING INTO A SMALL TREE BECAUSE OF THE VIOLENT SHAKING AND NECESSARY BRAKING TO 9 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 THAT WILL COST WELL OVER \$600 IN REPAIRS EXCLUDING A NEW FRONT BUMPER 11 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 12 TRAFFIC IT COULD HAVE BEEN MY LIFE OR THEIRS AND I WOULD THINK FORD 13 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. 14 HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER-DUTY/TOHP1M75VBFBFT9IL/P5. *TR 15 **1 Affected Product** 16 17 October 24, 2009 NHTSA ID NUMBER: 10289683 18 Components: SUSPENSION, STEERING **NHTSA ID Number:** 10289683 19 **Incident Date** October 21, 2009 Consumer Location MURFREESBORO, TN 20 Vehicle Identification Number 1FTSX21578E**** 21 **Summary of Complaint CRASHNo** 22

FIRENo

INJURIES0 23

DEATHSO 24

25

27

28

I HAVE EXPERIENCED AN ISSUE WITH MY 2008 FORD F-250 WHERE I HIT A BUMP ON THE INTERSTATE AND EXPERIENCED THE STEERING WHEEL OSCILLATING AND FRONT END 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 26 BUT HAD NOT DROVE IT ON THE INTERSTATE, ACTUALLY I HADN'T DRIVEN IT MUCH 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 75LBS TIRE PRESSURE AND THAT IS ALL THAT IS WRONG WITH

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Class Action Complaint

IT. THE TRUCKS STICKERS RECOMMENDATION IS LESS THAN THAT. THE WHEELS ON 1 MY TRUCK ARE STOCK FACTORY AND DO NOT HAVE LOW PRESSURE SENSORS ON 2 THEM. I HAVE RESEARCHED SEVERAL COMPLAINTS ON THE INTERNET ABOUT THIS ISSUES AND OF ACCIDENTS AND INJURIES RESULTING FROM WHAT IS BEING CALLED 3 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 4 TRAILER SOMETIMES WITH THIS TRUCK. IF THIS HAPPENED WHILE PULLING ONE I 5 AM SURE I WOULD HAVE BEEN SERIOUSLY INJURED OR KILLED AS IN OTHER CASES I HAVE HEARD ABOUT. I AM SCARED TO DEATH TO DRIVE THIS TRUCK NOW. 6 WHY ISN'T SOMEONE DOING SOMETHING ABOUT THIS. PLEASE HELP US WHO OWN 7 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 8 **1 Affected Product** 9 10 February 19, 2018 **NHTSA ID NUMBER: 11073630 Components: STEERING** 11 NHTSA ID Number: 11073630 12 **Incident Date** February 19, 2018 **Consumer Location TYLER, TX** 13 Vehicle Identification Number 1FTSW21R28E**** **Summary of Complaint** 14 **CRASHNo** 15 **FIRENo INJURIES0** 16 **DEATHS0** VIOLENT SHAKING OF FRONT WHEELS AND STEERING WHEEL AT HIGHWAY SPEED 65-17 70MPH AFTER HITTING BUMP IN THE ROAD. I CALLED THE FORD SERVICE DEPT AND 18 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 19 WOBBLE. IT SEEMS FORD IS IN DENIAL ABOUT THIS PROBLEM, THEY TRY TO BLAME TIRE PRESSURE ACCORDING TO ONLINE SOURCES. THERE SHOULD BE A SAFETY 20 RECALL FORCED BY THE NHTSA BEFORE SOMEONE GETS KILLED, IF THEY 21 HAVEN'T ALREADY! I HAD JUST HAD THE TRUCK TIRES ROTATED BALANCED AND AIR PRESSURE CHECKED BEFORE THIS TRIP! 22 1 Affected Product 23 24 April 22, 2009 NHTSA ID NUMBER: 10266394 **Components: STEERING, SUSPENSION** 25 NHTSA ID Number: 10266394 26 **Incident Date** February 16, 2009 Consumer Location PLEASANTON, CA 27 Vehicle Identification Number 1FDWW37R18E**** **Summary of Complaint** 28 **CRASHNo** -113-

Class Action Complaint

FIRENo 1

INJURIES0

2 **DEATHSO**

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OUR BUSINESS OWNS 4 FORD F-350 SUPER DUTY TRUCKS (2-2006 AND 2-2008). ALL OF 3 THEM HAVE A VERY SERIOUS DEFECT THAT CAUSES WHAT OUR EMPLOYEES REFER TO

4 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, IT IS ONLY A MATTER OF

TIME BEFORE SOMEONE IS KILLED. 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

13 July 29, 2009 NHTSA ID NUMBER: 10278647

Components: STEERING, SUSPENSION 14

NHTSA ID Number: 10278647

15 **Incident Date July 26, 2009**

Consumer Location PAMPA, TX

Vehicle Identification Number 1FDWX37R08E****

Summary of Complaint 17

CRASHNo

18 **FIRENo**

INJURIES0 19

DEATHS0

I HAVE TWO 2008 FORD F-350 SUPERDUTY 4X4 TRUCKS. ONE TRUCK HAS 39000 MILES 20 AND THE OTHER 61000 MILES. AT HIGHWAY SPEEDS, AFTER HITTING UNEVEN ROAD

21 SURFACE OR BUMPS, THEY BEGIN TO SHIMMY AND SHAKE SO BAD THAT I HAVE TO

PULL OVER TO GET IT TO OUIT I HAVE HAD THE TRUCKS IN NUMEROUS TIMES TO FIX 22

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

24 ONLINE AND THERE IS A COMPANY CALLED WCMOTORSPORTS THAT CLAIMS TO

KNOW WHY THESE TRUCKS ARE DOING THIS AND THE SOLUTION. THEIR WEBSITE IS 25 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 I FEEL THAT IT IS ONLY A MATTER OF TIME UNTIL THIS

CAUSES A FATALITY IF IT HASN'T ALREADY. *TR

-114-

Class Action Complaint

1 Affected Product 1 2 March 13, 2010 NHTSA ID NUMBER: 10319436 3 **Components: SUSPENSION** 4 NHTSA ID Number: 10319436 Incident Date March 12, 2010 5 Consumer Location RAYMOND, NH Vehicle Identification Number 1FTWX31508E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 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 TO COME BACK BECAUSE THEY CAN'T FIX IT. FORD TELLS ME TO GO BACK TO THE 12 DEALERSHIP. SOMEDAY I'M GOING TO KILL SOMEONE OR MYSELF IN THIS TRUCK 13 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 14 05/26/10 15 **1 Affected Product 2 Associated Documents** 16 17 May 28, 2013 NHTSA ID NUMBER: 10513953 18 Components: SUSPENSION, STEERING NHTSA ID Number: 10513953 19 **Incident Date** July 1, 2011 Consumer Location ORRVILLE, OH 20 Vehicle Identification Number 1FTWW31RX8E**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo** 23 **INJURIES0 DEATHS0** 24 REPEATED "DEATH WOBBLE". MANY TIMES, AT HIGHWAY SPEEDS WHEN I HIT A BUMP OR IMPERFECTION IN THE ROAD, THE TRUCK WILL VIOLENTLY SHAKE AND LOOSE 25 STEERING CONTROL. SEEMS TO HAPPEN MORE OFTEN DURING CURVES IN THE ROAD. I 26 HAVE SHOT SIDEWAYS ACROSS SEVERAL LANES OF TRAFFIC ON MORE THAN ONE OCCASION VERY NARROWLY AVOIDING A HIGH SPEED COLLISION. HAPPENS BOTH 27 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 28 TO FIX THE PROBLEM. I GUESS THEY WILL WAIT UNTIL SOMEONE DIES FROM THIS -115-Class Action Complaint

BEFORE THEY WILL ACT. I DON'T THINK IT WILL BE LONG BEFORE SOMEONE IS 1 KILLED FROM THIS LOSE OF STEERING CONTROL! *TR 2 1 Affected Product 3 4 March 3, 2010 NHTSA ID NUMBER: 10316308 **Components: STEERING** 5 NHTSA ID Number: 10316308 Incident Date January 2, 2009 6 Consumer Location SAN BERNARDINO, CA 7 Vehicle Identification Number 1FTWW33R68E**** **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHS0** I HAVE A 2008 FORD F-350 DUALLY THAT WHEN HITTING A DIP/BUMP IN THE ROAD AT 11 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 APRIL 2009 BASICALLY SAYING WHEN IT HAPPENS SLOW DOWN. THE DEALER REFUSES 13 TO DO ANYTHING. SOMEONE IS GOING TO GET KILLED IF THIS IS NOT FIXED. *TR 1 Affected Product 14 15 October 1, 2014 NHTSA ID NUMBER: 10640673 16 Components: SERVICE BRAKES, STEERING, WHEELS 17 **NHTSA ID Number:** 10640673 Incident Date September 22, 2014 18 Consumer Location JAMESTOWN, TN Vehicle Identification Number 1FTWW33R48E**** 19 **Summary of Complaint CRASHNo** 20 **FIRENo** 21 **INJURIES0 DEATHSO** 22 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 SHARP TO THE LEFT TAKING THE VEHICLE ONTO THE MEDIAN. ONCE THE VEHICLE 24 STOPPED, FACING IN THE OPPOSITE DIRECTION I GOT OUT AND CHECKED THE LEFT FRONT WHEEL, IT WAS TOO HOT TO TOUCH. I LET IT COOL AND THEN PROCEEDED TO 25 THE NEAREST EXIT. I HAD THE LEFT FRONT WHEEL INSPECTED, BUT NO PROBLEM WAS 26 DISCOVERED. I CONTINUED ON MY TRIP FROM TENNESSEE TO FLORIDA. ON THE RETURN TRIP THE PROBLEM HAPPENED THREE TIMES, EACH TIME I STOPPED AND LET 27 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 -116-

Class Action Complaint

TO RECALL THESE VEHICLES AND CORRECT THE PROBLEM BEFORE SOMEONE IS 1 INJURED OR KILLED. THERE IS SUFFICIENT DOCUMENTATION ON THE INTERNET TO 2 JUSTIFY THE NTSB TAKING ACTION. *TR **1 Affected Product** 3 4 April 23, 2013 NHTSA ID NUMBER: 10509217 5 **Components: STEERING, SUSPENSION** NHTSA ID Number: 10509217 6 **Incident Date** December 3, 2012 7 Consumer Location BROCKPORT, NY Vehicle Identification Number N/A 8 **Summary of Complaint CRASHNo** 9 **FIRENo** 10 **INJURIES0 DEATHS0** 11 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 DEALERS HAVE SAID TO KEEP PROPER AIR PRESSURE. I HAVE BEEN AN AUTO 14 MECHANIC FOR OVER 15 YRS NOW AND THAT IS THE BEST EXCUSE THE DEALER HAS. 15 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 RECALL BEFORE PEOPLE ARE KILLED DRIVING OR EVEN BEING NEAR THIS 17 VEHICLE. *TR 18 1 Affected Product 19 20 October 19, 2013 NHTSA ID NUMBER: 10548528 Components: SUSPENSION, WHEELS, STEERING 21 NHTSA ID Number: 10548528 **Incident Date** October 10, 2012 22 Consumer Location Unknown 23 Vehicle Identification Number N/A **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHS0** 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" IS VERY TRUE AND FORD REALLY NEEDS TO PAY ATTENTION BECAUSE IT WILL 28 COST SOMEONE THEIR LIFE. IF I WASN'T 65 YEARS OLD AND AN EXPERIENCED -117-

Class Action Complaint Case No.

DRIVER THE MULTIPLE TIMES I'VE EXPERIENCED THIS COULD HAVE KILLED ME. I 1 HAVE REPLACED EVERYTHING INVOLVING THE SUSPENSION, TIRES, STRUTS, RODS, 2 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 3 THEM FOR THE LEMONS/DEATH TRAPS THEY'RE PRODUCING & SELLING. FORD IS 4 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 5 PRESENT. *TR **1 Affected Product** 6 7 April 2, 2014 NHTSA ID NUMBER: 10576804 8 Components: SUSPENSION, STEERING NHTSA ID Number: 10576804 9 Incident Date April 1, 2014 10 Consumer Location POTTSTOWN, PA Vehicle Identification Number N/A 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHSO** 14 I OWN A 2009 FORD F250 SUPER DUTY 4X4 AFTER HITTING A SMALL BUMP IN THE RD. 15 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 16 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 17 CRASH.WHY HAS FORD NOT RECALLED THE TRUCKS TO FIX THE PROBLEM.WHY WHEN 18 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. MUST SOMEONE DIE 19 BEFORE FORD IS MADE TO CORRECT THIS EXTREMELY DANGEROUS DEFECT. PLEASE INFORM ME OF OUTCOME OF THIS INVESTIGATION. THANK YOU. *TR 20 1 Affected Product 21 22 January 5, 2012 NHTSA ID NUMBER: 10442582 23 **Components: STEERING, SUSPENSION** NHTSA ID Number: 10442582 24 Incident Date November 20, 2011 Consumer Location TAMASSEE, SC 25 Vehicle Identification Number 1FTWW31R39E**** 26 **Summary of Complaint CRASHNo** 27 **FIRENo INJURIES0** 28 **DEATHS0** -118-

Class Action Complaint

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WHEN MY TRUCK IS DRIVEN OVER A POTHOLE, ONTO A BRIDGE, OR ANY CHANGE IN
 1
    ELEVATION IN THE DRIVING SURFACE, THE VEHICLE WILL SHAKE VIOLENTLY. THE
2
    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
3
    END OF NOVEMBER AND HAS CONTINUED TO GET WORSE AND HAPPEN MORE
    FREOUENTLY. I HAVE CONTACTED FORD MOTOR COMPANY AND WAS TOLD THERE IS
4
    NO RECALL AND TO KEEP RECORDS OF MY REPAIRS IF THERE EVER IS ONE. THE
5
    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
6
    TRUCK THAT IS NOT SAFE FOR MY FAMILY TO RIDE IN. THIS PROBLEM WILL
7
    CERTAINLY CAUSE FATALITIES IF IT HASN'T ALREADY. I AM A CDL DRIVER AND IF
    I CAN'T CONTROL THE VEHICLE THEN I DOUBT ANYONE ELSE CAN EITHER. *TR
8
    1 Affected Product
9
10
    January 11, 2015 NHTSA ID NUMBER: 10671655
    Components: SUSPENSION, STEERING, WHEELS
11
    NHTSA ID Number: 10671655
12
    Incident Date November 27, 2014
    Consumer Location LEANDER, TX
13
    Vehicle Identification Number 1FTWW31R89E****
    Summary of Complaint
14
    CRASHNo
15
    FIRENo
    INJURIES0
16
    DEATHS0
    HIT ROAD BUMP & THE 'DEATH WOBBLE' OCCURRED CAUSING THE TRUCK TO SHAKE
17
    UNCONTROLLABLY & FORCE US TO THE SIDE OF THE ROAD. I TOOK IT TO FORD
18
    DEALERSHIP & THEY OUOTED ME OVER $7K TO FIX VIRTUALLY EVERYTHING
    SUSPENSION RELATED. I TOOK IT 2 LOCAL DIESEL MECHANICS WHO EVENTUALLY
19
    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
20
    FORD ENTHUSIAST AS WELL AS OTHER DIESEL TRUCK OWNERS....THIS IS A SCARY,
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
    FLAW THAT IS DANGEROUS. IF SOMEONE HASN'T BEEN KILLED BECAUSE OF THIS
23
    ALREADY, I'D BE SHOCKED. *TR
24
    1 Affected Product
25
26
    July 24, 2013 NHTSA ID NUMBER: 10531702
    Components: STEERING, SUSPENSION
27
    NHTSA ID Number: 10531702
    Incident Date July 22, 2013
28
    Consumer Location PELHAM, NH
                                        -119-
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Class Action Complaint

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Vehicle Identification Number N/A
 1
    Summary of Complaint
2
    CRASHNo
    FIRENo
3
    INJURIES0
4
    DEATHS0
    I JUST BOUGHT THIS VEHICLE AND WAS DRIVING THE HIGHWAY AT 65 MPH. I WENT
5
    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
6
    ONE GOT HURT. MY FAMILY AND OTHERS COULD HAVE BEEN KILLED. THE
7
    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
8
    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
9
    THE FRONT END PARTS REPLACED AND THEN THE PROBLEM RETURNS AGAIN. WHAT IS
10
    THE NHTSA DOING ABOUT THIS? DO NOT HAVE VIN AT THIS TIME MY TRUCK IS AT THE
    DEALERS. *TR
11
    1 Affected Product
12
13
    January 13, 2014 NHTSA ID NUMBER: 10559662
    Components: STEERING, SUSPENSION
14
    NHTSA ID Number: 10559662
15
    Incident Date January 25, 2013
    Consumer Location DEER PARK, TX
16
    Vehicle Identification Number 1FTSW2BR5AE****
    Summary of Complaint
17
    CRASHNo
18
    FIRENo
    INJURIES0
19
    DEATHS0
    AT 65 MPH, HIT UNEVEN ROAD, FRONT END WOBBLED DRAMATICALLY !!!!!!!! TRUCK
20
    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
22
    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
23
    ACKNOWLEDGE. DOES SOMEONE HAVE TO DIE TO GET THEIR ATTENTION ?????
24
    *TR
    1 Affected Product
25
26
    January 6, 2015 NHTSA ID NUMBER: 10670511
    Components: STEERING
27
    NHTSA ID Number: 10670511
    Incident Date September 17, 2014
28
    Consumer Location GARDEN RIDGE, TX
                                         -120-
    Class Action Complaint
    Case No.
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Vehicle Identification Number 1FTSW2BRXAE**** 1 **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** AT VARIOUS SPEEDS FROM 45 ON UP FRONTEND WILL SHAKE VIOLENTLY CAUSING 5 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 6 THE SURFACE. WHEN I WENT TO MY LOCAL FORD DEALER, THEY QUICKLY IDENTIFIED 7 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 8 TAKING RESPONSIBILITY FOR IT. THEY ONLY OFFER THE CONSUMER TO PAY OUT OF POCKET FOR AFTERMARKET PART TO RECTIFY THEIR ILL ENGINEERED FRONTEND. 9 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 11 ATTEMPT TO PRETEND AND BURY ISSUES KNOWING THEY PRESENT A COMPROMISE IN SAFETY. THERE IS A COUNTLESS NUMBER OF PEOPLE WHO HAVE DONE THEIR 12 PART TO NOTIFY BOTH FORD AND NHTSA OF THIS ONGOING ISSUE FOR YEARS AND 13 BOTH SEEM NEGLIGENT NOT TO AGGRESSIVELY REMEDY ANY AND ALL CURRENT VEHICLES WITH THIS DEFECT, AS WELL AS, ANY UNIT IN PRODUCTION. IT 14 SHOULDN€™T TAKE BLOODSHED/DEATH FOR SOMEONE TO TAKE OWNERSHIP OF THEIR DEFECTIVE PRODUCT. 15 1 Affected Product 16 17 February 25, 2016 NHTSA ID NUMBER: 10838463 18 Components: WHEELS, UNKNOWN OR OTHER, STEERING **NHTSA ID Number:** 10838463 19 **Incident Date** February 25, 2016 Consumer Location BALTIMORE, MD 20 Vehicle Identification Number 1FTSW2B55AE**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo INJURIES0** 23 **DEATHS0** 24 WHILE DRIVING MY 2010 FORD F250 SUPER DUTY ON THE HIGHWAY I DROVE OVER A BUMP IN THE ROAD. THE TRUCK BEGAN TO SHAKE VIOLENTLY. IT FELT LIKE IT WAS 25 GOING TO FALL APART WHILE STILL IN MOTION. I TRIED TO HIT THE BRAKE BUT THAT SEEMED TO EXACERBATE THE PROBLEM. I TRIED TO ADJUST THE STEERING WHEEL IN 26 HOPES TO ALIGN SOME DEFUNCT COMPONENT. NOTHING SEEMED TO HELP EXCEPT 27 TO LET OFF THE GAS AND ATTEMPT TO CONTROL THE VEHICLE AND AVOID A POTENTIAL FATAL ACCIDENT. THIS REALLY WAS A FRIGHTENING EVENT, IT WAS 28

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Class Action Complaint

1 ALL I COULD DO TO MAINTAIN A SAFE DISTANCE AROUND ME SO NOT TO COLLIDE WITH OTHER DRIVERS. 2 3 September 10, 2015 NHTSA ID NUMBER: 10763032 4 Components: STEERING, WHEELS, SUSPENSION NHTSA ID Number: 10763032 5 **Incident Date** October 20, 2012 **Consumer Location MEMPHIS, TN** 6 Vehicle Identification Number 1FTWW3DR6AE**** 7 **Summary of Complaint CRASHNo** 8 **FIRENo** 9 **INJURIES0 DEATHS0** 10 LOSS OF CONTROL WHEN DRIVING ON BUMPY SECTION OF FREEWAY, DUE TO EXTREME SHAKING OF FRONT END. IT SEEM TO AMPLIFY IN THE SEVERITY AND 11 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 PROBLEM FOR THIS MAKE AND MODEL BUT THAT NEITHER FORD OR THE DEALER 14 WOULD TAKE RESPONSIBILITY FOR THE REPAIR. BUT, THEY DID HOWEVER HAVE A 15 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 VEHICLE TO DRIVE. WE BOUGHT IT TO PULL A LARGE TRAVEL TRAILER BUT DO NOT 17 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 INTENDED. WE COULD NOT BE MORE DISAPPOINTED IN FORD AND OUR DEALER. 19 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 20 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 Components: STEERING, SUSPENSION 24 **NHTSA ID Number:** 10969398 **Incident Date** February 13, 2017 25 Consumer Location JAY, FL 26 Vehicle Identification Number 1FTWW3DR3AE**** **Summary of Complaint** 27 **CRASHNo FIRENo** 28 **INJURIES0** -122-

Class Action Complaint

DEATHS0 1 2010 FORDF350 SUPER DUTY, 127,000 MILES. I HAVE THE DREADED "FORD DEATH 2 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 3 WIFE WON'T RIDE IN THE CAR, THAT'S HOW COOLANT THE SHAKE IS. I'VE CONTACTED 4 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 5 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, 6 THE EVIDENCE/CAUSE OF CRASH WILL BE DESTROYED, HOW FOURTINANT FOR 7 FORD. **1 Affected Product** 8 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 DEATHS0** 16 THESE TRUCKS SHAKE VIOLENTLY IN THE FRONT END WHEN THEY ENCOUNTER EVEN THE SMALLEST OF BUMPS IN THE ROAD. FORD HAS FAILED TO TAKE THE RESPONSIBLE 17 AND CORRECTIVE MATTERS TO FIX THE PROBLEMS. SOMETHING MUST BE DONE 18 BEFORE SOMEONE GET KILLED, PLEASE SEE FORDFORUM.ORG TO SEE THAT MANY OTHERS ARE HAVING THE SAME ISSUES. *TR 19 1 Affected Product 20 21 January 25, 2012 NHTSA ID NUMBER: 10445217 Components: SUSPENSION, STEERING 22 NHTSA ID Number: 10445217 23 **Incident Date** January 20, 2012 Consumer Location ROCHESTER HILLS, MI 24 Vehicle Identification Number 1FT7W2B60BE**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** I WAS DRIVING ON A ENTRANCE RAMP TO AN INTERSTATE AT ABOUT 55-60MPH... I 28 RECALL HITTING SOME TYPE OF ROAD BUMPS - PAVEMENT JOINT THAT STARTED THE -123-Class Action Complaint

1 EVENT... TYPICALLY I'M USED TO EXPERIENCING THE BACK OF MY TRUCK BOUNCE IN THE PAST CAUSING LANE CORRECTION BUT THIS TIME THE WHOLE FRONT END 2 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 3 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 SEVERE I HAD A HARD TIME CONTROLLING IT AND GETTING IT SAFELY OFF THE 5 ROADWAY... PAPERS IN MY VISORS SHOOK LOOSE... 2 GYM BAGS IN PASSENGER SEAT ENDED UP ON FLOOR.... A LARGE SCREEN TV THAT WAS TAPED AGAINST THE BACK 6 WINDOW ON THE BACK SEAT WAS THUS SHIFTED LAYING NOW ON TOP OF THE FRONT 7 SEATS.... I LATER REALIZED THAT THE SANDWICH I JUST BOUGHT WAS GONE FROM THE CONSOLE AND LATER FOUND ON THE FLOOR AT THE PASSENGERS DOOR!!!! BEING 8 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 BUT GOT THE PUCKER FACTOR EACH TIME I HIT ROAD BUMPS ON MY TRIP.. I WORK 10 FOR THE CITY OF ROCHESTER HILLS AND CALLED OUR FLEET MGR, AND TOLD HIM OF MY ISSUE, HE HAD NO IDEA BUT CHECKED AND FOUND TSB 11-6-14 THAT WAS 11 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 12 POSSIBLE ROLL OVER ISSUE, AS IM SURE IF I WAS AT 70-80 ON THE FREEWAY OR MY 13 KIDS DRIVING WITH LESS EXPERIENCE THERE WOULD HAVE BEEN A ROLLOVER... FORD SAID UNTIL IT HAPPENS AGAIN OR THE DEALER CAN NOT FIX IT THERE WAS 14 NOTHING MORE THEY COULD DO!!!!! I ADVISED IT LOOKS LIKE THE NEXT CALL THEY WANT IS FROM LEGAL COUNCIL ADDING THE 0000 AFTER A FATALITY!!! *TR 15 1 Affected Product 16

February 5, 2012 **NHTSA ID NUMBER: 10446711**

Components: SUSPENSION, STEERING

NHTSA ID Number: 10446711 Incident Date December 15, 2011

20 | Consumer Location SAINT CHARLES, MO

Vehicle Identification Number 1FT7W2BT1BE****

21 | Summary of Complaint

22 CRASHNO FIRENO

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INJURIES0

DEATHS0

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

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Class Action Complaint

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VIOLENT SHAKE AGAIN. TOOK IT STRAIGHT BACK TO DEALERSHIP AND THEY HAD A
 1
    FORD ENGINEER LOOK AT IT AND THEY REPLACED A TRACK BAR BALL JOINT AND
2
    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
3
    HIM THAT HE SAID THAT THE ENGINEER SAID I NEEDED TO PUT NEW TIRES ON AND A
4
    ALIGNMENT BEFORE THEY DO ANYTHING ELSE. THERE IS SOMETHING MORE THAN
    TIRES AND ALIGNMENT WRONG WITH MY TRUCK!!!!! MY FAMILY TRUCK HAS
5
    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
6
    CONCERN!!! *TR
7
    1 Affected Product
8
9
    November 13, 2013 NHTSA ID NUMBER: 10552092
    Components: SUSPENSION
10
    NHTSA ID Number: 10552092
    Incident Date November 4, 2013
11
    Consumer Location DALLAS, TX
12
    Vehicle Identification Number 1FT7W2BT5BE****
    Summary of Complaint
13
    CRASHNo
    FIRENo
14
    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
    LOSS OF CONTROL. I HAD TO COME TO A COMPLETE STOP ON THE HIGHWAY AND
17
    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
    HIGHWAY. AFTER COMING TO A COMPLETE STOP, THIS CAUSED ANOTHER
19
    ACCIDENT ON THAT HIGHWAY THAT I WAS NOT INVOLVED IN BUT WAS A DIRECT
    RESULT OF MY HAVING TO SLOW TO A STOP DUE TO THIS INCIDENT. AFTER THIS, I
20
    LOOKED ONLINE AND IT APPEARS THAT THIS HAS BEEN A PROBLEM WITH FORD
21
    SUPER DUTY TRUCKS SINCE 2006 AND HAS CAUSED MORE THAN ONE ACCIDENT
    AND POSSIBLE FATALITIES. THIS IS A FAIRLY COMMON PROBLEM AS WELL. THE
22
    TRUCK IS LESS THAN 3 YEARS OLD, AND HAS LESS THAN 36,000 MILES ON IT. *TR
    1 Affected Product
23
24
    August 12, 2015 NHTSA ID NUMBER: 10748019
25
    Components: SUSPENSION, UNKNOWN OR OTHER, STEERING
26
    NHTSA ID Number: 10748019
    Incident Date June 17, 2015
27
    Consumer Location WINDSOR, PA
    Vehicle Identification Number 1FT7X2B62BE****
28
    Summary of Complaint
                                        -125-
    Class Action Complaint
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CRASHNo 1 **FIRENo** 2 **INJURIES0 DEATHSO** 3 WAS GETTING ON THE INTERSTATE AND WENT OVER A SEPARATION CRACK AT ABOUT 4 55 MPH WHEN THE TRUCK FRONT AXLE / SUSPENSION STARTED TO VIBRATE VIOLENTLY / SHAKING UNCONTROLLABLY. I STARTED TO PUT A SECURE HOLD ON THE 5 STEERING WHEEL AND AT THE SAME TIME APPLYING THE BRAKES. AFTER SLOWING DOWN TO ABOUT 35 MPH THE TRUCK STARTED TO SMOOTH OUT, PULLED OVER TO 6 THE SIDE OF THE EXPRESSWAY, CHECKED THE TRUCK OUT, DID NOT FIND ANY 7 PROBLEM. I CONTINUED AT REDUCED SPEED TO HOME AND CHECKED IT OUT AGAIN, BUT DID NOT FIND ANYTHING. PRIOR TO THAT INCIDENT, I HAD COMPLAINED TO THE 8 DEALER ABOUT WHAT I THOUGHT WAS A ROUGH RIDE, WENT WITH A MECHANIC FROM THE DEALERSHIP FOR A RIDE, AND HE SAID IT RIDES LIKE THE OTHER F250'S. 9 AFTER THE VIBRATION INCIDENT, I DECIDED TO CHECK THE LEFT FRONT SHOCK, 10 REMOVED IT AND THOUGHT THAT IT WAS NOT WORKING TO WELL. TOOK IT TO THE DEALERSHIP AND THEY SAID IT WAS A LITTLE BAD, AND THEY WOULD REPLACE IT, I 11 THEN ASK THEM ABOUT THE RIGHT SHOCK, AND THEY DID NOT THINK THAT THE RIGHT SIDE WAS BAD, I THEN STATED THAT I WAS TOLD THAT THEY ARE REPLACED IN 12 PAIRS, AND THAT THE REARS SHOULD ALSO BE REPLACED. THEY SAID NO, BUT AFTER 13 MORE DISCUSSION, THEY DID AGREE TO REPLACE THE RIGHT SHOCK {CUSTOMER SATISFACTION I.IT DID SEEM TO RIDE BETTER. HOW EVER ON THE EVENING OF FRIDAY 14 7 AUGUST, THE TRUCK HAD ANOTHER EPISODE ON A DIFFERENT ROAD, LIKE IT HAD OVER A MONTH AGO. SO I DON'T THINK THAT SHOCKS ARE THE TOTAL PROBLEM.. IT 15 IS POSSIBLE THAT UNDER DIFFERENT WEATHER CONDITIONS, THIS PROBLEM 16 COULD INJURE OR KILL MANY PEOPLE!!! SO WHO IS TO BLAME ???? NOT ME !!! **1 Affected Product** 17 18 November 10, 2015 NHTSA ID NUMBER: 10789577 19 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 10789577 20 **Incident Date** July 1, 2015 21 Consumer Location CHRISTMAS VALLEY, OR Vehicle Identification Number 1FT7W2BT2BE**** 22 **Summary of Complaint CRASHNo** 23 **FIRENo** 24 **INJURIES0 DEATHSO** 25 WE HAVE A 2011 FORD F250 SUPER DUTY DIESEL PICK UP WITH LESS THAN 20,000 MILES. IT IS LIKE NEW, BUT HAS DEVELOPED A SERIOUS MECHANICAL DEFECT. FORD 26 MOTOR COMPANY HAS TRIED UP TO (11) ELEVEN FIXES FOR THIS LIFE 27 THREATENING PROBLEM WITH NO SUCCESS. NONE OF THESE "FIXES" APPLY ON THIS PICK UP. NOW SINCE THE PICK UP IS OLDER THAN 3 YRS. EVEN WITH SUCH LOW

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MILEAGE THEY WANT US TO PAY FOR "TRYING" OUT MORE POSSIBLE FIXES THAT

Class Action Complaint

Case No.

28

HAVE CURRENTLY BEEN UNSUCCESSFUL FOR ALL THESE FORD F250 & F350 PICK UPS. 1 THIS SHOULD BE AT THE FORD MOTOR COMPANY'S EXPENSE. THE BOTTOM LINE, IT 2 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 3 ANYTIME THESE FORD SUPER DUTY F250 OR F350 DIESEL PICKUPS ARE DRIVEN OVER 4 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 5 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 6 IS WORSE THAN THE INTERNET VIDEO AS CONFIRMED BY THE BEND OREGON FORD 7 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 8 STRENGTH TO KEEP IT ON THE ROAD. IT'S ONE OF THE MORE FRIGHTENING EXPERIENCES YOU'LL ENCOUNTER BEHIND THE WHEEL. THE VEHICLE IS SHAKING 9 SO BADLY YOU THINK IT'LL FALL APART AND THAT YOU'RE GOING TO DIE. THAT'S 10 WHY IT'S CALLED DEATH WOBBLE. **1 Affected Product** 11 12 May 16, 2017 NHTSA ID NUMBER: 10986078 13 Components: STEERING, SUSPENSION NHTSA ID Number: 10986078 **Incident Date** February 22, 2017 Consumer Location MONTPELIER, VA Vehicle Identification Number 1FT7W2BTXBE****

14

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16 **Summary of Complaint**

CRASHNo 17 **FIRENo**

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18 **INJURIES0**

DEATHSO

19 WHEN DRIVING THIS TRUCK, IF YOU HIT A POTHOLE OR ANY UNEVEN SURFACE, THE TRUCK WILL SHAKE VIOLENTLY AND IT'S ALL OVER THE ROAD. IT TAKES ALL THE 20 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

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

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.

1 Affected Product

January 22, 2018 **NHTSA ID NUMBER: 11064272**

Components: SUSPENSION NHTSA ID Number: 11064272 **Incident Date** January 21, 2018

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Class Action Complaint

- **Consumer Location** ANCHORAGE, AK 1 Vehicle Identification Number 1FT7W2BT5BE**** 2 **Summary of Complaint CRASHNo** 3 **FIRENo** 4 **INJURIES0 DEATHSO** 5 FROM DAY 1 I HAVE HAD ISSUES WHERE THE FRONT END WOULD BOUNCE UNCONTROLLABLY AT HIGHWAY SPEEDS AFTER HITTING A POTHOLE OR BRIDGE 6 EXPANSION JOINT. IT'S GETTING WORSE. THE DEALERSHIP CANNNOT FIND ANY 7 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 8 THIS AS I COULD NOT MAINTAIN CONTROL. THIS WILL KILL SOMEONE IF NOT RESEARCHED AND CORRECTED BY FORD. 9
- 10 1 Affected Product
 - November 4, 2015 **NHTSA ID NUMBER: 10788327**
- 12 | Components: STEERING, WHEELS, ELECTRONIC STABILITY CONTROL
- NHTSA ID Number: 10788327
- 13 | Incident Date July 1, 2015
- Consumer Location CHRISTMAS VALLEY, OR
- Vehicle Identification Number 1FT7W2BT2BE****
- 15 Summary of Complaint
- 16 CRASHNo
- | FIRENo

11

- 17 | INJURIES0
 - DEATHS0
- 18 | RE: THE DEATH WOBBLE WE HAVE A 2011 FORD F250 SUPER DUTY DIESEL PICK UP
- 10 WITH LESS THAN 20,000 MILES. IT IS LIKE NEW, BUT HAS DEVELOPED A SERIOUS
- 19 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"
- APPLY ON THIS PICK UP. NOW SINCE THE PICK UP IS OLDER THAN 3 YRS. EVEN WITH
- 21 SUCH LOW MILEAGE THEY WANT US TO PAY FOR "TRYING" OUT MORE POSSIBLE FIXES THAT HAVE CURRENTLY BEEN UNSUCCESSFUL FOR ALL THESE FORD 250 & 350 PICK
- 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,
- 23 | 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. (SEE WEBSITE BELOW). THIS OCCURS ANYTIME THESE FORD SUPER DUTY 250 OR 350 PICKUPS REACH
- 25 20K MILES. THIS OCCURS WHEN DRIVING OVER 40 MILES PER HOUR IF AT ANYTIME A
- 25 BUMP, ROUGH ROAD, OR POTHOLE IN THE ROAD IS HIT. THE OPERATOR LOOSES
- 26 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
- 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. **THE**

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Class Action Complaint

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VEHICLE IS SHAKING SO BADLY YOU THINK IT'LL FALL APART AND THAT YOU'RE
 1
    GOING TO DIE. THAT'S WHY IT'S CALLED DEATH WOBBLE.
2
    HTTPS://WWW.YOUTUBE.COM/WATCH?V=8EUQ6F8RGT4
   HTTPS://WWW.YOUTUBE.COM/WATCH?V=B LMKNW9NHQ
3
    1 Affected Product
4
5
   January 12, 2016 NHTSA ID NUMBER: 10819770
   Components: STEERING, WHEELS, ELECTRONIC STABILITY CONTROL
6
    NHTSA ID Number: 10819770
7
   Incident Date July 4, 2015
   Consumer Location NEWBERG, OR
8
    Vehicle Identification Number 1FT7W2BT2BE****
9
   Summary of Complaint
   CRASHNo
10
   FIRENo
   INJURIES0
11
   DEATHS0
12
   WE HAVE A 2011 DIESEL FORD F250 SUPER DUTY PICKUP. IT IS LIKE NEW, BUT HAS
    DEVELOPED A SERIOUS MECHANICAL DEFECT. WHEN IT HAD LESS THAN 20,000 MILES
13
   IT BEGAN HAVING THE "DEATH WOBBLE". WE HAVE CONSISTENTLY TRIED TO GET THE
   LOCAL FORD DEALERSHIP IN BEND, OREGON AND FORD MOTOR CORPORATION TO
14
    RESOLVE THIS DEATH THREATENING MECHANICAL PROBLEM WITH NO LUCK. THIS
15
   STARTED OCCURRING WHEN DRIVING OVER 40 MILES PER HOUR IF AT ANYTIME A
   BUMP, ROUGH ROAD, OR POTHOLE IN THE ROAD IS HIT. NOW IT CAN'T EVEN BE
16
    DRIVEN THAT FAST WITHOUT VIOLENTLY AND UNCONTROLLABLY GOING INTO THE
   DEATH WOBBLE. APPLYING THE BRAKES MAKES IT WORSE. IT HAS TO BE ALLOWED TO
17
    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
    EXPERIENCES ONE WILL EVER ENCOUNTER BEHIND THE WHEEL. THE VEHICLE IS
19
    SHAKING SO BADLY YOU THINK IT'LL FALL APART AND THAT YOU'RE GOING TO
    DIE. THE FIRST TIME IT HAPPENED WITH MY SON DRIVING, IT PULLED HIM INTO
20
   ON-COMING TRAFFIC TOWARDS A SEMI-TRUCK. HE BARELY PULLED IT BACK INTO
21
    HIS LANE BEFORE HAVING A "HEAD ON" COLLISION. THE BEND OREGON
   DEALERSHIP CONFIRMED THIS PICKUP DEATH WOBBLE IS WORSE THAN THOSE
22
    DESCRIBED ON THE INTERNET. (SEE WEBSITE BELOW). SEE INTERNET SITE EXAMPLES:
   HTTPS://WWW.YOUTUBE.COM/WATCH?V=8EUQ6F8RGT4
23
    HTTPS://WWW.YOUTUBE.COM/WATCH?V=B LMKNW9NHQ
24
    1 Affected Product
25
26
   January 22, 2019 NHTSA ID NUMBER: 11171468
    Components: STEERING
27
    NHTSA ID Number: 11171468
    Incident Date January 22, 2019
28
    Consumer Location GORE, VA
                                        -129-
    Class Action Complaint
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- 1 Vehicle Identification Number 1FT7W2BT6BE****
- **Summary of Complaint**
- 2 **CRASHNo**
- **FIRENo** 3
 - **INJURIES0**
- 4 **DEATHS0**
- WHILE DRIVING 55-65 MPH THE STEERING STARTS SHAKING VIOLENTLY, YOU ARE 5
- 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 6 CONTROL HOPING NO ONE RUNS INTO YOU FOR HAVING TO STOP QUICKLY. THIS IS
- 7 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 8 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. 9
- THE FORD DEALERSHIP SAID I NEEDED NEW TIRES. THIS DID NOT HELP.
- 10 **1 Affected Product**

11

- 12 July 2, 2014 NHTSA ID NUMBER: 10607807
- Components: SUSPENSION, STEERING
- 13 NHTSA ID Number: 10607807
- **Incident Date** April 19, 2014 14
 - Consumer Location HAMBURG, NY
- 15 Vehicle Identification Number 1FTBF3A60BE****
- **Summary of Complaint** 16
- **CRASHNo**
- **FIRENo** 17
 - **INJURIES0**
- 18 **DEATHS0**
- **2011 F350 SD 4X2. FIRST NOTICED THIS PHENOMENON AT 65MPH ON THE THRUWAY. 19 WHEN HITTING CERTAIN ROUGH ROAD SURFACE, OR BUMPS, OR CONCAVITIES ETC.,
- FRONT WHEELS "HOP" TO ONE SIDE, STEERING THE VEHICLE INTO THE SHOULDER, IF 20
- "HOPPING" TO THE RIGHT, OR INTO THE LEFT LANE OF TRAFFIC IF BUMP CAUSES A
- 21 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 22
- 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 23
- CONCRETE CURB OR A PEDESTRIAN OR ANOTHER VEHICLE. I HAVE DRIVEN OTHER
- 24 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 25 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. 26
- "ONCE ITS LOADED, YOU WILL BE OK", SAYS FORD. SO THEIR THEORY STATES ITS OK 27
 - 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 28 TIME THEN ITS OK TO HAVE A VEHICLE THAT IS UNSAFE 1/2 THE TIME YOU DRIVE IT!

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Class Action Complaint

1 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 2 BEFORE SOMEONE IS KILLED. 3 **INCIDENTALLY, THIS IS A 2011 THAT I BOUGHT BRAND NEW IN 2014. IT SAT ON THE 4 LOT FOR 3 YEARS. THIS HAS NO BEARING ON THE ISSUE HOWEVER SINCE THE 2015 DISPLAYS THE SAME TENDENCIES. *TR 5 **1 Affected Product** 6 7 September 20, 2012 NHTSA ID NUMBER: 10476600 **Components: STEERING** 8 NHTSA ID Number: 10476600 **Incident Date** September 20, 2012 9 Consumer Location CEDAR RUN, NJ 10 Vehicle Identification Number 1FT8W3BTXBE**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** STEERING GOES INTO VIOLENT SHAKING. FEELS LIKE TIRES ARE FALLING OFF. 14 SLOWED DOWN AND STOPPED. ACCORDING TO YOU'RE REPORTS THIS IS NOT THE 15 FIRST TIME FOR THIS PROBLEM. THIS SHOULD BE A RECALL BEFORE SOMEONE **GETS KILLED BECAUSE OF THIS. *TR** 16 **1 Affected Product** 17 18 February 25, 2016 NHTSA ID NUMBER: 10838113 Components: SUSPENSION, ELECTRICAL SYSTEM, ELECTRONIC STABILITY CONTROL 19 NHTSA ID Number: 10838113 **Incident Date** February 25, 2016 20 Consumer Location BLACKSHEAR, GA 21 Vehicle Identification Number 1FT7W2BT1CE**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** TWO DIFFERENT PROBLEMS: FIRST I WAS LEFT STRANDED ABOUT 2 1/2 HOURS AWAY 25 FROM HOME BECAUSE OF A SIMPLE EGT SENSOR DEFECT SHUT DOWN MY TRUCK. HAD 26 TO PAY A TOWER \$350 TO DRIVE MY TRUCK TO DEALERSHIP AND THEY TELL ME IT WAS A LITTLE SENSOR THAT LEFT ME STRANDED. THIS TYPE THING SHOULDN'T 27 HAPPEN WHEN YOU PAY \$60,000 PLUS FOR A VEHICLE. NOW MONTHS LATER I HAVE ANOTHER ISSUE THAT FROM ALL THE BLOGS SAY IS A PROBLEM MOST 2012 MODELS 28 HAVE CALLED THE "DEATH WOBBLE". IT IS NOW HAPPENING AT LEAST ONCE ON -131-Class Action Complaint

1 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 2 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 3 NOW REFUSES TO DRIVE MY TRUCK BECAUSE SHE IS SCARED TO DEATH TO DRIVE IT. I 4 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 5 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 6 DIESEL ENGINE. IT IS HAPPENING MORE OFTEN NOW THAN BEFORE, AND I FELL IT 7 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 8 ADMIT THAT THIS IS A PROBLEM ON EVERY ONLINE SITE I GO TOO, I ASSUME IT WILL TAKE A FEW PEOPLE GETTING KILLED BEFORE THEY REALIZE THERE IS A 9 PROBLEM. WHAT ARE OWNERS TO DUE WITH THIS, BECAUSE IF WE TRADE THE 10 TRUCK KNOW ONE IS GOING TO WANT TO BUY IT. SO ONCE AGAIN THE CONSUMER GETS SHAFTED. NHTSA WE ARE LOOKING FOR YOU TO HELP US WITH THIS 11 PROBLEM BEFORE SOMEONE GETS KILLED. PLEASE HELP US WITH THIS PROBLEM! PLEASE!!!!!! 12 **1 Affected Product** 13 14 December 5, 2016 NHTSA ID NUMBER: 10930091

15 Components: STEERING, SUSPENSION

NHTSA ID Number: 10930091 16

Incident Date March 1, 2016

Consumer Location LIVINGSTON, TX 17

Vehicle Identification Number 1FT7W2BT1CE****

18 **Summary of Complaint**

CRASHNo 19

FIRENo

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27

28

20 **INJURIES0**

DEATHSO

21 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 23

OR SO. THE WOBBLE WAS SO SERIOUS AND SCARY. I WOULD HAVE TO APPLY MY 24

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

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. 26

LAST MONTH ON NOVEMBER 14, 2016, I TOOK MY TRUCK INTO OUR LOCAL FORD

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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Class Action Complaint

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PARTS. REPLACE DRAG INK AND END, INSTALL ADJUSTERS FOR CASTOR, FRONT END
 1
   ALIGNMENT (4 WHEEL DRIVE). THE FORD DEALERSHIP WAS EVEN AWARE OF THIS
2
   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
3
   LOCK IN ON THE FRONT END. I HAVE AN APPOINTMENT, TAKING MY TRUCK BACK TO
4
   FORD DEALERSHIP TOMORROW MORNING FOR ADDITIONAL REPAIRS. THIS IS A
    MAJOR SAFETY ISSUE ON THESE VEHICLES AND SOMETHING MUST BE DONE
5
    ABOUT IT. A RECALL SHOULD AND MUST BE MANDATORY FOR THE PUBLIC
   SAFETY. THIS ISSUE WILL END UP KILLING SOMEONE (IF, IT HAS NOT ALREADY) IF,
6
    A RECALL IS NOT ORDERED IMMEDIATELY. *TR
7
    1 Affected Product
8
9
    August 29, 2017 NHTSA ID NUMBER: 11020396
    Components: STEERING, SUSPENSION, WHEELS
10
    NHTSA ID Number: 11020396
   Incident Date August 27, 2017
11
    Consumer Location COTTONWOOD, CA
12
    Vehicle Identification Number 1FT7W2BT2CE****
    Summary of Complaint
13
   CRASHNo
   FIRENo
14
   INJURIES0
15
   DEATHSO
    WHILE DRIVING 60 MPH OVER HIGHWAY STEERING AND FRONT WHEELS
16
    STARTING SHAKING SO VIOLENTLY THE TRUCK WAS OUT OF CONTROL AND
    NEARLY CAUSED MAJOR ACCIDENT, THIS HAS HAPPENED TO US ON THREE
17
   OCCASIONS. I FEEL THIS PROBLEM IS VERY DANGEROUS AND IS A FLAW IN THE
18
    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
   ANOTHER OPINION! I FEEL THIS VEHICLE TYPE BE RECALLED, I HOPE NOBODY DIES
20
    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
    CONDITIONS ON THREE DIFFERENT OCCASIONS WERE ON HIGHWAY CONDITIONS
22
    DRIVING OVER SMALL PAVEMENT BUMPS AT SPEEDS RANGING FROM 60 TO 70 MPH
    STRAIGHT ROADS AND ALSO TURNING ON CURVES, THE TRUCK SHAKES SO
23
    VIOLENTLY THAT YOU LOOSE CONTROL TRUCK SHAKING CONTINUES UNTIL THE
24
    TRUCK ALMOST COMES TO A STOP WHILE YOU ARE BRAKING TO SLOW DOWN.
    THIS HAPPENS SO FAST AND WITHOUT ANY WARNING IN STEERING OR ROAD FEEL.
25
    THIS OCCURS WITH SUCH SURPRISE AND SO VIOLENTLY OUT OF NOWHERE
    1 Affected Product
26
27
    February 18, 2018 NHTSA ID NUMBER: 11073450
28
    Components: SUSPENSION
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Class Action Complaint Case No.

- **NHTSA ID Number:** 11073450 1 **Incident Date** January 17, 2018 2 Consumer Location CORPUS CHRISTI, TX **Vehicle Identification Number** 1FT7W2BTXCE**** 3 **Summary of Complaint** 4 **CRASHNo FIRENo** 5 **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 FORUMS DEVOTED TO THIS PROBLEM. **DOES SOMEONE HAVE TO DIE BEFORE FORD** 9 WILL ISSUE A RECALL???? 10 **1 Affected Product** 11 12 July 9, 2018 NHTSA ID NUMBER: 11110173 **Components: SUSPENSION** 13 NHTSA ID Number: 11110173 **Incident Date** July 4, 2018 14 Consumer Location COLUMBUS GROVE, OH 15 Vehicle Identification Number 1FT7W2BTXCE**** **Summary of Complaint** 16 **CRASHNo FIRENo** 17 **INJURIES0** 18 **DEATHS0** THE TRUCK SHAKES VIOLENTLY AT TIMES AFTER A BUMP IN THE ROAD. OUR TRUCK 19 WENT BACK TO THE DEALER SEVERAL TIMES WHILE UNDER WARRANTY FOR THIS HOWEVER THEY SAID SINCE IT COULD NOT BE REPRODUCED CONSISTENTLY NOTHING 20 COULD BE DONE. IT HAS GRADUALLY GOTTEN WORSE - MUCH WORSE. LAST SUMMER 21 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 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 23 INTERNET AND ON THIS SITE SO WHY CAN THIS NOT BE FIXED? I DROVE MY GRAND-24
- 27 QUICKLY AT 55 MPH OR MORE. IF SOMEONE DIES FROM THIS "DEATH WOBBLE" IT SHOULD BE FORD'S RESPONSIBILITY.

1 Affected Product

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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 FORD WILL

PROBLEM! IT SEEMS LIKE IT RARELY HAPPENS AT 40 MPH OR BELOW BUT HAPPENS

STEP UP AND AT LEAST TELL THOSE OF US THAT OWN THEM HOW TO FIX THIS

Class Action Complaint

Case No.

25

26

1 2 August 17, 2018 NHTSA ID NUMBER: 11120681 **Components: STEERING** 3 NHTSA ID Number: 11120681 4 **Incident Date** August 19, 2017 Consumer Location SKOKIE, IL 5 Vehicle Identification Number 1FT7W2BT4CE**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** AS REPORTED FROM PREVIOUS OWNERS, DEATH WOBBLE HAS HAPPENED A NUMBER 9 OF TIMES. I GET WOBBLE AT DIFFERENT TIMES IN DRIVING. I HAD DRIVEN 240 MILES 10 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 11 TO LOCK UP. I PULLED OVER TO CHECK FRONT WHEELS WITH NOT NOTICING 12 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 \$65,000.00 AND THIS HAPPENS THE MANUFACTURER SHOULD BE SENDING OUT RECALL 14 NOTICES. THE MANUFACTURE KNOWS ABOUT THIS AND CHANGED IT ON NEWER 15 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 16 THIS IN COURT ON A CLASS ACTION LAWSUIT? MY VEHICLE HAS 149,000 MILES ON IT AND STARTED AROUND 130,000 MILES. 17 1 Affected Product 18 19 April 26, 2014 NHTSA ID NUMBER: 10585101 Components: STEERING, WHEELS, SUSPENSION 20 NHTSA ID Number: 10585101 21 **Incident Date** April 18, 2014 Consumer Location CASTALIAN SPRINGS, TN 22 Vehicle Identification Number 1FT7W2BT2CE**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 DRAMATIC WHEEL AND FRONT END WOBBLE WHEN HITTING A BRIDGE TRANSITION. VEHICLE BECOMES UNCONTROLLABLE AND CONTINUES TO SHAKE VIOLENTLY UNTIL 27 VEHICLE COMES TO ALMOST A COMPLETE STOP. I HAD THIS SAME ISSUE IN MY 2005 F250 AND HAD TO CHANGE ALMOST ALL THE COMPONENTS OF THE FRONT END TO FIX. 28 THERE ARE HUNDREDS OF PEOPLE SPEAKING ABOUT THIS ON THE FORUMS AND -135-Class Action Complaint

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STATE THAT THERE ARE TSBS THAT COVER THIS BUT THAT THE PARTS FAIL AGAIN IN
 1
    ABOUT 25K MILES. I PULL A BOAT QUITE OFTEN AND IF THIS WOULD HAVE HAPPENED
2
    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
3
    ISSUE HAS BEEN AROUND FOR A LONG TIME AND IT SEEMS THAT IT HAS NOT BEEN
4
    ADDRESSED BY THE MANUFACTURE. I LOVE AND NEED MY 3/4 TON TRUCK AND
    BELIEVE THAT FORD MAKES THE BEST TRUCK, BUT THERE WILL BE DEATHS CAUSED
5
    BY THIS, IF NOT ALREADY. NOW I WILL START THE LONG PROCESS OF GETTING THE
    DEALER TO FIX THE ISSUE. *TR
6
    1 Affected Product
7
8
    March 4, 2014 NHTSA ID NUMBER: 10567064
    Components: WHEELS, STEERING, SUSPENSION
9
    NHTSA ID Number: 10567064
10
    Incident Date March 1, 2014
    Consumer Location COLTS NECK, NJ
11
    Vehicle Identification Number 1FT8W3DT9CE****
12
    Summary of Complaint
    CRASHNo
13
    FIRENo
    INJURIES0
14
    DEATHS0
15
    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
16
    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
17
    GOT WORSE UNTIL ABOUT 15 MPH, IT THEN STOPPED. I THEN GOT UP TO 60 MPH AND
18
    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
19
    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
20
    WILL DO 40 MPH ALL THE WAY THERE. I WILL NOT TOW MY HORSES TRAILER WITH
21
    THIS VEHICLE, IT WOULD HAVE CAUSED AN ACCIDENT AND KILLED MY HORSES.
    *TR
22
    1 Affected Product
23
24
    April 9, 2014 NHTSA ID NUMBER: 10578607
    Components: WHEELS, STEERING, SUSPENSION
25
    NHTSA ID Number: 10578607
26
    Incident Date January 15, 2014
    Consumer Location VALPARAISO, IN
27
    Vehicle Identification Number 1FT8W3BT4CE****
    Summary of Complaint
28
    CRASHNo
                                        -136-
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Class Action Complaint

1 **FIRENo INJURIES0** 2 **DEATHS0** I AM EXPERIENCING WHAT THEY CALL THE "DEATH WOBBLE". AFTER HITTING A 3 SERIES OF BUMPS / POT HOLES, THE FRONT WHEELS START TO SHIMMY AND SHAKE 4 THE TRUCK VIOLENTLY, VERY HARD TO CONTROL THE VEHICLE. AS THE MILEAGE INCREASES ON MY TRUCK, THE INCIDENTS ARE BECOMING MORE FREQUENT AND 5 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 6 TRUCK BEGAN TO SHIMMY AND SHAKE AND IT WENT INTO A FRENZY, THE WHOLE 7 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 8 THE VEHICLE. APPLYING THE BRAKES ONLY MADE IT WORSE. I AM A 6' 3" STRONG MUSCULAR MAN, AND COULD NOT CONTROL THE STEERING WHEEL OR DIRECTION OF 9 THE VEHICLE. I STARTED IN THE RIGHT LANE, BUT WOUND UP IN THE MEDIAN, AND 10 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 11 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 12 MODIFIED FROM THE ORIGINAL FACTORY CONDITION!! A FORD CERTIFIED 13 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 14 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 15 FORD HAS DONE NOTHING TO ADDRESS OR CORRECT THE SITUATION. GUESS WE 16 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 17 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 18 **OVER THE TRUCK. WHY IS THIS BEING IGNORED ??** *TR 19 1 Affected Product 20 21 January 15, 2015 NHTSA ID NUMBER: 10672741 Components: POWER TRAIN, SUSPENSION, STEERING 22

NHTSA ID Number: 10672741 **Incident Date** September 10, 2013 Consumer Location HIGHLANDS, TX

- 24 Vehicle Identification Number 1FT8W3BT2CE****
- **Summary of Complaint** 25

CRASHNo

23

28

FIRENo 26

INJURIES0

27 **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

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Class Action Complaint

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 IT TO ME 3 TIMES ON A 3 WEEKS PERIOD. SINCE THE ROADS ARE BAD UP THERE I 3 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 WRONG UNDER THE TRUCK. I WAS MONTHS WITHOUT HAVING ANYTHING SIMILAR 5 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 6 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 AND MY TRUCK SHAKE ITS WAY FROM ONE LANE TO ANOTHER ONE AND FINALLY 8 STOPPED 3 INCHES FROM THE RETAINING WALL OF THE OVERPASS. I COULD HAVE KILLED MYSELF. I HAD NO MORE CONTROL AT ALL ON THIS TRUCK WHICH IS A 9 (2012 F-350 KING RANCH WITH ABOUT 40,000 MILES ON IT) LUCKELY FOR ME I WAS 10 ALMOST ALONE ON THE HIGHWAY. I CALLED MY DEALER AND THEY TOLD ME TO 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 GOT ANOTHER 2012 F-350 LARIAT AND MY HUSBAND SAID HIS TRUCK DID IT TO HIM 12 ONCE A WHILE BACK. I WRITE UP THE OUTCOME AFTER THE VISIT AT THE DEALER. 13 *TR 14

1 Affected Product

August 13, 2016 NHTSA ID NUMBER: 10895527

Components: SUSPENSION NHTSA ID Number: 10895527 **Incident Date** August 12, 2016

Consumer Location LEESBURG, GA

Vehicle Identification Number 1FT8W3BT9CE****

Summary of Complaint

20 **CRASHNo FIRENo** 21 **INJURIES0**

15

16

17

18

19

23

24

25

26

27

28

DEATHSO 22

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

REPLACEMENT OF OVER \$2000 WORTH OF PARTS. MULTIPLE OTHER COMPLAINTS

FOUND ONLINE FROM OTHER OWNERS. PARTS REPLACED INCLUDE, TIE ROD ENDS, TIE 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+ ANY DISTURBANCE (BUMPS) IN THE ROAD CREATES THE START OF THE FRONT END

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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Class Action Complaint

BUSY 5 LANE INTERSTATE (I-285 IN ATLANTA) QUITE LITERALLY IN THE MIDDLE OF 1 THE INTERSTATE. THIS HAS BEEN WORKED ON WITH 2 DIFFERENT DEALERSHIPS, 2 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 3 HAVE A DANGEROUS ISSUE LIKE THIS. THERE SHOULD ABSOLUTELY BE A FIX 4 AND/OR RECAL AHGAINST THIS VEHICLE BEFORE SOMEONE GETS KILLED. **1 Affected Product** 5 6 September 22, 2017 NHTSA ID NUMBER: 11025099 7 Components: ELECTRONIC STABILITY CONTROL, STEERING, SUSPENSION NHTSA ID Number: 11025099 8 **Incident Date** September 21, 2017 Consumer Location MICANOPY, FL 9 Vehicle Identification Number 1FT8W3BT7DE**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 OSCILLATE TO THE POINT OF INDUCING A VIOLENTLY STEERING WHEEL SHIMMY AND 15 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 16 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 THE VEHICLE BEING VERY DIFFICULT TO CONTROL. ONLY AFTER SLOWING TO 19 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 DEALERSHIPS AFTER EACH INCIDENT EACH TIME WE WERE TOLD THERE WAS 22 NOTHING WRONG WITH THE VEHICLE AND THIS SOMETIMES HAPPENS WITH THESE TRUCKS. THIS CAN'T SERIOUSLY BE TRUE? AFTER DOING RESEARCH I'VE FOUND THAT 23 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 CONSUMERS BUT FOR SO MANY. 25 1 Affected Product 26 27 March 29, 2018 NHTSA ID NUMBER: 11081940 Components: STEERING, SUSPENSION 28 **NHTSA ID Number:** 11081940 -139-

Class Action Complaint

1 **Incident Date** March 14, 2018 Consumer Location PARKER, CO 2 Vehicle Identification Number 1FT83BT3FEC**** **Summary of Complaint** 3 **CRASHNo** 4 **FIRENo INJURIES0** 5 **DEATHS0** MY TRUCK AT AROUND 15000 MILES HAD SOME WOBBLE AFTER HITTING BUMPS ON 6 HIGHWAY. I TOOK IT IN FOR ITS 25000 MILE CHECK UP AND STATED THIS AS WELL AS 7 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 8 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 9 BECAUSE NOW IT WAS 40 DAY PAST THE 3 YEAR. EVEN THOUGHT THEY TOLD ME TO 10 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 11 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 12 DID. THEY SOLD ME A AFTER MARKET WARRANTY THAT THEY NEVER INTENDED TO 13 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 14 IN THE PROBLEM. **1 Affected Product** 15 16 September 15, 2018 NHTSA ID NUMBER: 11129632 17 **Components: STEERING, SUSPENSION** 18 NHTSA ID Number: 11129632 **Incident Date** September 1, 2018 19 Consumer Location DOUSMAN, WI Vehicle Identification Number 1FT7W2B61EE**** 20 **Summary of Complaint** 21 **CRASHNo FIRENo** 22 **INJURIES0 DEATHSO** 23 AT HIGH SPEEDS HITTING POT HOLES OR BRIDGE DECKS, FRONT END WOBBLES 24 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 25 TURNING A BLIND EYE.CRASHING ON THE FREEWAY AT THOSE SPEEDS COULD BE

26 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. ALL I WANT IS FOR FORD

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Class Action Complaint

Case No.

28

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1
    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
2
    BACK. I CAN'T STRESS TO YOU ENOUGH WHAT A DANGEROUS ISSUE THIS IS. I
    WOULD LOVE TO TAKE MY TRUCK TO THE FORD MOTOR COMPANY AND HAVE JIM
3
   HACKETT DRIVE IT, THEN I WOULD BE FIXED. JUST A SIDE NOTE, THERE WAS A
4
    CONSUMER IN SILSBE TEXAS THAT NOTED THE SERVICE WRITER AT SILSBE FORD SAID
    THAT SHE DOESN'T KNOW WHY FORD DOESN'T FIX THIS BECAUSE IT IS SUCH A BIG
5
    PROBLEM. IN CLOSING PLEASE, PLEASE, PLEASE LOOK INTO THIS ISSUE AND HOLD
    FORDS FEET TO THE FIRE. THANK YOU.
6
    1 Affected Product
7
8
    January 10, 2019 NHTSA ID NUMBER: 11166160
9
    Components: SUSPENSION
    NHTSA ID Number: 11166160
10
   Incident Date May 13, 2016
    Consumer Location LINCOLN, AL
11
    Vehicle Identification Number 1FT7W2BT0EE****
12
   Summary of Complaint
    CRASHNo
13
   FIRENo
   INJURIES0
14
    DEATHSO
15
   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
16
    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
17
    DAILY BASIS AND I DON?T WANT TO RISK THEIR LIVES. YOU NEVER KNOW WHEN THE
18
   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
19
    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
20
    TRAFFIC. IF YOU GOOGLE THE DEATH WOBBLE THERE IS A LOT OF INFORMATION ON
21
   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
22
    OFF AT THE DEALERSHIP YESTERDAY AND AS OF TONIGHT I HAVE NOT BEEN NOTIFIED
   BY THEM. CAN ANYONE TELL ME WHAT WOULD BE A PERMANENT REPAIR FOR
23
   THIS PROBLEM? IF THERE IS NOT ONE THEN FORD SHOULD HAVE TO BUY BACK
24
    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
25
    POSSIBLY DANGEROUS.
    1 Affected Product
26
27
    September 10, 2017 NHTSA ID NUMBER: 11022555
28
    Components: STEERING
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Class Action Complaint Case No.

1 NHTSA ID Number: 11022555 **Incident Date** August 31, 2017 2 Consumer Location DISCOVERY BAY, CA Vehicle Identification Number 1FT7W2BT5EE**** 3 **Summary of Complaint** 4 **CRASHNo FIRENo** 5 **INJURIES0 DEATHS0** 6 4WD FRONT END SHAKES VIOLENTLY WITHOUT WARNING AROUND 50 MPH.FRONT 7 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 8 HAPPENING.ALMOST KILLED MY FAMILY.SEEMS TO BE KNOWN AS "DEATH WOBBLE" TO THE ONLINE COMMUNITY ALSO SEEMS TO COMMON TO NOT BE A ISSUE.FORD 9 CLAIMS ITS A WORN TRACK BAR BUSHING AND WOULD NOT FIX THIS UNDER MY 10 DRIVETRAIN WARRANTY.EXPERTS CLAIM IT IS DESIGN ISSUE IN THE 4WD FRONT END CASTER ANGLE.HAS HAPPEND MULTIPLE OCCASIONS 11 **1 Affected Product** 12 13 July 15, 2017 NHTSA ID NUMBER: 11005447 Components: STEERING, SUSPENSION 14 NHTSA ID Number: 11005447 15 **Incident Date July 14, 2017** Consumer Location APPLE VALLEY, CA 16 Vehicle Identification Number 5SFBG3828BE**** **Summary of Complaint** 17 **CRASHNo** 18 **FIRENo INJURIES0** 19 **DEATHS0** 20 I HAVE EXPERIENCED AN EXTREME SHIMMING (DEATH WOBBLE) NUMEROUS TIMES WHILE DRIVING AT SPEED ON THE FREEWAY. AFTER GOING OVER A BRIDGE 21 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 22 IT STOPS. THIS HAPPENED TO ME TWICE YESTERDAY (7/14/17). THE FIRST TIME IT HAPPENED I ALMOST CAUSED AN ACCIDENT BEHIND ME WHEN I APPLIED THE 23 BRAKES. THE SECOND TIME I WAS IN THE SLOW LANE AND WAS ABLE TO GET ON THE 24 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 25 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 26 DID NOT SEE ANY RECALL FOR THIS ON YOUR SITE OR ON FORD'S SITE. I HAVE AN 27 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 28

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Class Action Complaint Case No.

1 TO WHAT I AM SURE IS A LONG LIST OF PEOPLE WITH THE SAME COMPLAINT. DOES SOMEBODY HAVE TO DIE BECAUSE OF THIS ISSUE BEFORE IT IS ADDRESSED? 2 1 Affected Product 3 4 December 26, 2017 NHTSA ID NUMBER: 11056574 Components: STEERING, SUSPENSION, WHEELS 5 NHTSA ID Number: 11056574 **Incident Date** December 23, 2017 6 Consumer Location OKLAHOMA CITY, OK 7 **Vehicle Identification Number** 1FT7W2BT9FE**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHS0** 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. THERE ARE A TON OF COMPLAINTS OUT THERE REGARDING THIS MATTER, AND 14 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 INJURED OR DIE BECAUSE OF THIS. MY TRUCK IS PAMPERED, AND ONLY HAS 55K ON 16 IT, SO THIS ISN'T BECAUSE OF ABUSE. **1 Affected Product** 17 18 June 5, 2018 NHTSA ID NUMBER: 11099958 19 **Components: STEERING, WHEELS** NHTSA ID Number: 11099958 20 **Incident Date** May 31, 2018 21 Consumer Location SUGAR HILL, NH Vehicle Identification Number 1FT8X3BT7FE**** 22 **Summary of Complaint** 23 CRASHNo **FIRENo** 24 **INJURIES0 DEATHS0** 25 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. -143-

Class Action Complaint

1 1 Affected Product 2 October 20, 2018 NHTSA ID NUMBER: 11141552 3 **Components: STEERING** 4 NHTSA ID Number: 11141552 Incident Date October 14, 2018 5 Consumer Location GROTON, CT Vehicle Identification Number 1FT7X2B69GE**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** MY TRUCK, WITH 41,000 MILES, IS SUFFERING WHATS BEING REFERRED TO ONLINE AS 10 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 11 JOINTS AT HIGHWAY SPEED, FORCING ME TO SLOW TO APPROX 20 MPH TO REGAIN 12 CONTROL, WHICH IS VERY UNSAFE ON A CROWDED HIGHWAY. THE DEALER I PURCHASED THE TRUCK FROM NEW SAID IT IS NOT A WARRANTY ITEM AND MAY NOT 13 EVEN BE COVERED UNDER MY ADDITIONALLY PURCHASED 10 YEAR 100,000 MILE EXTENDED WARRANTY. THE TRUCK IS ESSENTIALLY UNSAFE AT HIGHWAY SPEEDS 14 AND MY WIFE WONT EVEN RIDE IN IT. FORD IS IGNORING A HUGE PROBLEM WITH 15 THEIR PRODUCT, PEOPLE HAVE ALREADY BEEN HURT, SOMEONE IS GOING TO BE KILLED! PLEASE HELP!! I HAVE AN APPOINTMENT AT THE DEALERS SERVICE 16 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, PLEASE 17 INTERJECT INTO THIS ISSUE BEFORE SOMEONE IS KILLED AND TO SAVE THE 18 BUYERS FROM HAVING TO PAY FORD TO ADDRESS THIS OBVIOUS ENGINEERING MISTAKE. 19 **1 Affected Product** 20 21 December 14, 2018 NHTSA ID NUMBER: 11161469 **Components: STEERING, SUSPENSION** 22 NHTSA ID Number: 11161469 23 Incident Date December 1, 2018 Consumer Location PITTSFORD, NY 24 Vehicle Identification Number 1FT8W3DTXGE**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** POPULARLY REFERRED TO AS "DEATH WOBBLE". AT SPEEDS ABOVE 50 MPH, THE 28 TRUCK INSTANTLY GOES FROM FULL CONTROL TO AN UNCONTROLLED STATE OF -144-Class Action Complaint

SEVERE OSCILLATION THAT CAN ONLY BE STOPPED BY STOPPING OR SLOWING THE 1 VEHICLE TO 10 MPH OR LESS. THERE IS NO PRIOR WARNING THAT THIS IS ABOUT TO 2 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 3 EXPANSION JOINT. THE CONDITION IS MANIFESTED BY VIOLENT SHAKING OF THE 4 FRONT END ACCOMPANIED BY THE STEERING WHEEL BEING JERKED OUT OF THE DRIVER'S HANDS, RESULTING IN COMPLETE LOSS OF STEERING CONTROL. THIS 5 CAUSES AN EXTREMELY HAZARDOUS CONDITION FOR OTHER VEHICLES AS WELL AS THE PROBLEM TRUCK. FORD HAS ISSUED A TSB FOR THIS PROBLEM 18-2258, 6 CONSISTING OF A REPLACEMENT STEERING DAMPENER AND VARIOUS ALIGNMENT 7 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 8 INSTALLATION. THUS FAR, IT HAS HAPPENED A TOTAL OF FOUR TIMES WITH MY TRUCK, AN F350-2016. THIS PROBLEM IS SEVERE, IT IS EXTREMELY DANGEROUS 9 AND SOONER OR LATER, SOMEONE WILL BE INJURED OR KILLED. FOR THE FHTSA -10 I HAVE DASHCAM MOVIES OF THIS. **1 Affected Product** 11 12 January 29, 2018 NHTSA ID NUMBER: 11065587 13 Components: STEERING, SUSPENSION, WHEELS NHTSA ID Number: 11065587 14 **Incident Date** November 25, 2017 15 Consumer Location LOUDONVILLE, OH Vehicle Identification Number 1FT7W2B62HE**** 16 **Summary of Complaint CRASHNo** 17 **FIRENo** 18 **INJURIES0 DEATHSO** 19 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 20 HAS FALLEN OFF.. YOU HAVE TO COME DOWN TO 20MPH OR STOP TO REGAIN 21 CONTROL.. I HAVE ONLY 19000 MILES ON MY TRUCK AND THIS HAS HAPPENED 4 TIMES NOW.. THIS IS GOING TO KILL SOME ONE NEEDS FIXED.. HAVE HAD IT TO 22 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. 23 1 Affected Product 24 25 November 30, 2018 NHTSA ID NUMBER: 11155263 26 **Components: SUSPENSION** NHTSA ID Number: 11155263 27 **Incident Date** November 30, 2018 Consumer Location HESPERIA, CA 28 Vehicle Identification Number 1FT7W2B67HE****

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Class Action Complaint

Summary of Complaint
CRASHNo
FIRENo
INJURIESO
DEATHSO

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
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 ONLIN

CONTROL OF THE TRUCK. IT WAS TERRIFYING. AFTER DOING A QUICK SEARCH ONLINE
7 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

8 IS GOING TO DIE.

1 Affected Product

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January 10, 2019 **NHTSA ID NUMBER: 11166300**

12 | Components: SUSPENSION 12 | NHTSA ID Number: 1116630

2 NHTSA ID Number: 11166300 Incident Date January 7, 2019

Consumer Location MUNCY, PA

14 | Vehicle Identification Number 1FT7W2BTXHE****

Summary of Complaint

15 | CRASHNo

16 FIRENO

INJURIES0

17 | DEATHS0

WHILE TRAVELING ABOUT 60 MPH ON A RURAL ROAD THE TRUCK FRONT END

18 STARTED SHAKING RAPIDLY STEERING WHEEL VIOLENTLY IERKED OUT OF MY HAD

STARTED SHAKING RAPIDLY. STEERING WHEEL VIOLENTLY JERKED OUT OF MY HAND.
TRUCK WAS VERY HARD TO CONTROL AND RAPID BRAKING WAS REQUIRED IN ORDER

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

LOOSE OR OBVIOULSY BROKEN. WENT ON MY WAY. TRUCK NOW DOES THIS SEVERAL

TIMES DAILY WHILE DRVING EXTREMELY DANGEROUS SOMEONE IS GOING TO GET

TIMES DAILY WHILE DRVING. EXTREMELY DANGEROUS. SOMEONE IS GOING TO GET KILLED DUE TO THIS ISSUE. ITS JUST A MATTER OF TIME. AFTER SOME RESEARCH I

22 | CAN SEE THAT THIS IS A KNOWN ISSUE REFERRED TO AS "DEATH WOBBLE". TWO

23 OTHERS I KNOW OF WITH BRAND NEW TRUCKS ARE ALSO HAVING THESE ISSUES. I

TOOK MY TRUCK TO DEALER AT 7,000 MILES COMPLAINING ABOUT "CHATTER" IN THE

FRONT END WHEN HITTING BUMPS. THEY STATED NOTHING WRONG, AND NOW AT 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

HAVE A CALL IN TO THE DEALER. FORD APPEARS TO BE SLAPPING A NEW STEERING 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

HAPPENING ON OLD OR WORN FRONT END PARTS. THIS SHOULD NOT HAPPEN ON A

Class Action Complaint

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NEW TRUCK UNDER ANY CIRCUMSTANCE, EVEN WITH NO STEERING DAMPER. THIS 1 ISSUE NEEDS A RECALL BEFORE SOMEONE IS KILLED. 2 1 Affected Product 3 4 February 4, 2019 NHTSA ID NUMBER: 11174271 **Components: STEERING, SUSPENSION** 5 NHTSA ID Number: 11174271 **Incident Date** January 31, 2019 6 Consumer Location HOPE MILLS, NC 7 Vehicle Identification Number 1FT7W2B60HE**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHSO** UNCONTROLLED "DEATH WOBBLE" WHEN DRIVING OVER 45 MPH. THIS OCCURS WHEN 11 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, IT IS EXTREMELY 13 DANGEROUS AND COULD POTENTIALLY CAUSE THE VEHICLE TO TURN INTO ADJACENT VEHICLES CAUSING FATALITIES. THE ONLY WAY TO RECOVER FROM A 14 DEATH WOBBLE IS TO UNEXPECTEDLY SLOW DOWN, WHICH IS ALSO DANGEROUS TO 15 NEIGHBORING VEHICLES ESPECIALLY WHEN TRAVELING AT HIGH SPEEDS. IN MY PARTICULAR CASE, THIS OCCURRED WHILE TRAVELING AT 70MPH ON AN INTERSTATE, 16 AT NIGHT, AND DURING INCLEMENT WEATHER. I WAS DRIVING STRAIGHT AND AFTER DRIVING ONTO A ROAD-BRIDGE TRANSITION, THE VEHICLE BEGAN TO SUDDENLY 17 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 MEDIAN TO AVOID HITTING MY VEHICLE. I CHECKED MY VEHICLE FOR DAMAGED 19 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. 1 Affected Product 22 23 November 18, 2018 NHTSA ID NUMBER: 11152254 24 **Components: STEERING** NHTSA ID Number: 11152254 25 **Incident Date** November 17, 2018 26 Consumer Location SYRACUSE, UT Vehicle Identification Number 1FT7W2B65HE**** 27 **Summary of Complaint CRASHNo** 28 **FIRENo** -147-Class Action Complaint

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INJURIES1
 1
   DEATHS0
2
   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).
3
   THE VEHICLE IMMEDIATELY STARTED TO DO A DEATH WOBBLE AND WE LOST
4
    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
5
    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
6
   BROKEN PARTS. THE DEALERS WERE CLOSED OR UNABLE TO GET US IN ON
7
   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
8
    ACCIDENT. THIS IS A MAJOR SAFETY ISSUE IF THIS TRUCK CANNOT GO DOWN A
   HIGHWAY WITHOUT A DEATH WOBBLE. SOMEONE OF LESSER DRIVING SKILL
9
    WILL NOT KNOW WHAT TO DO AND THIS TRUCK COULD KILL SOMEONE. VIDEO OF
10
    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
11
    AND STARTS TO VIOLENTLY SHAKE. THE HOOD CAN CLEARLY BE SEEN VIBRATING
    AND THE DASH CAM RECORDS AND SAVED THE EVENT AS A CRASH.
12
    1 Affected Product
13
14
    December 23, 2018 NHTSA ID NUMBER: 11163232
15
    Components: STEERING
    NHTSA ID Number: 11163232
16
    Incident Date December 23, 2018
    Consumer Location WHITE PINE, TN
17
    Vehicle Identification Number 1FT7W2BT4HE****
18
   Summary of Complaint
   CRASHNo
19
   FIRENo
20
   INJURIES0
   DEATHSO
21
   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
22
    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
23
    BEEN A BAD WRECK.
24
    1 Affected Product
25
26
   February 3, 2019 NHTSA ID NUMBER: 11173771
    Components: STEERING
27
    NHTSA ID Number: 11173771
    Incident Date February 2, 2019
28
    Consumer Location BEARDSTOWN, IL
                                        -148-
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Class Action Complaint

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Vehicle Identification Number 1FT7X2BT8HE****
 1
    Summary of Complaint
2
    CRASHNo
    FIRENo
3
   INJURIES0
4
    DEATHS0
    ?DEATH WOBBLE? STEERING WHEN A ROAD BUMP ENCOUNTERED. FRONT SREERING
5
    DAMPER HAS BEEN REPLACED TWICE (2 TIMES) PREVIOUSLY, BUT THE ALMOST
    UNCONTROLLABLE FRONT END SHIMMY IS BACK. HAVE NEVER HAD A FORD TRUCK
6
    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
    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
9
    STRUCTURALLY IS CAUSING THE STEERING ISSUE. I HOPE IT DOESN?T TAKE
10
    FATALITIES FOR FORD TO FIND A SOLUTION.
    1 Affected Product
11
12
    February 5, 2019 NHTSA ID NUMBER: 11174349
13
    Components: STEERING
    NHTSA ID Number: 11174349
14
    Incident Date February 3, 2019
15
    Consumer Location CALDWELL, ID
    Vehicle Identification Number 1FT7W2BT6HE****
16
    Summary of Complaint
    CRASHNo
17
    FIRENo
18
    INJURIES0
    DEATHSO
19
    TYPICAL HIGHWAY DRIVING OVER MINOR ABNORMALITIES IN ROADWAY AT SPEEDS
    OVER 50 MPH CAN CAUSE THE STEERING TO SHAKE VIOLENTLY AND WILL CONTINUE
20
    UNLESS/UNTIL YOU BRAKE NEARLY TO A STOP. THIS HAPPENS WITHOUT WARNING
21
    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
    THEY ARE SIMPLY REPLACING DEFECTIVE PARTS TO GET PAST THE WARRANTY
23
    PERIOD AND NOT SOLVING THE TRUE CAUSE OF THE PROBLEM. IF NOT CURED
24
    PROPERLY, LIVES WILL BE LOST BECAUSE OF THIS KNOWN FLAWED DESIGN.
    PLEASE DON'T LET THIS KILL ANYONE (ELSE?)!!!
25
    1 Affected Product
26
27
    July 29, 2018 NHTSA ID NUMBER: 11114415
    Components: SUSPENSION
28
    NHTSA ID Number: 11114415
                                        -149-
    Class Action Complaint
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1 | Incident Date June 7, 2018 | Consumer Location CRYSTAL, MN

Wehicle Identification Number 1FT8W3BT0HE****

3 | Summary of Complaint

CRASHNo

4 | FIRENo

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INJURIES0

DEATHS0

6 | "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

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

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

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

12 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

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. THIS ISSUE WILL KILL SOMEONE SOMEDAY.

15 SOMEONE SOMEDA

16 1 Affected Product

B. Ford's Knowledge of the Suspension Defect

- 36. Defendant has significant and long-standing knowledge of the Defect described herein. 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:

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

100 10/10/2007

2006 E 250

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2006	F-350	100	10/10/2007	4/9/2018
2007	F-250	59	4/7/2007	5/7/2018
2007	F-350	23	7/21/2008	5/7/2018
2008	F-250	36	6/25/2019	11/9/2018
2008	F-350	24	4/22/2009	7/25/2018
2009	F-250	26	9/2/2012	11/19/2018
2009	F-350	9	1/5/2012	10/22/2018
2010	F-250	27	5/26/2012	10/8/2018
2010	F-350	7	5/23/2014	3/29/2017
2011	F-250	117	11/12/2010	1/22/2019
2011	F-350	35	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
2013	F-250	11	12/30/2013	1/22/2019
2013	F-350	4	12/20/2016	7/2/2018
2014	F-250	13	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
2016	F-350	9	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	

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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.

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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
    Components: STEERING
2
    NHTSA ID Number: 10206556
    Incident Date October 19, 2007
3
    Consumer Location BARTO, PA
4
    Vehicle Identification Number 1FTNF21515E****
    Summary of Complaint
5
    CRASHNo
    FIRENo
6
    INJURIES0
7
   DEATHSO
   TL*THE CONTACT OWNS A 2005 FORD F-250. WHILE DRIVING 65 MPH, THE VEHICLE
8
    SHOOK VIOLENTLY AND BECAME DIFFICULT TO STEER AFTER DRIVING OVER A BUMP
    IN THE ROAD. THE CONTACT STATED THAT IT WAS NOT A NORMAL FRONT END SHAKE
9
    AND CONTINUED DRIVING HOME AT A LOWER RATE OF SPEED. THE DEALER ROTATED
10
    THE TIRES, BUT THAT DID NOT CORRECT THE FAILURE. THE MANUFACTURER
    ADVISED HER TO CALL NHTSA AND TO TAKE THE VEHICLE BACK TO THE DEALER.
11
    THE CURRENT MILEAGE WAS 30,400 AND FAILURE MILEAGE WAS 18,000.
    1 Affected Product
12
13
    January 4, 2012 NHTSA ID NUMBER: 10442409
14
    Components: STEERING
15
    NHTSA ID Number: 10442409
    Incident Date September 6, 2006
16
    Consumer Location MERIDIAN, MS
    Vehicle Identification Number 1FTWW31P56E****
17
    Summary of Complaint
18
    CRASHNo
    FIRENo
19
    INJURIES0
20
    DEATHSO
    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
    VIBRATE VIOLENTLY. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER, WHERE
22
    BOTH FRONT TIE ROD ENDS WERE REPLACED. THE CONTACT ALSO RECENTLY
    RECEIVED AN ADVISORY NOTIFICATION LETTER FROM THE MANUFACTURER IN
23
    REGARDS TO STEERING WHEEL AND FRONT END VIBRATIONS WHEN DRIVING OVER
24
    BUMPY ROAD SURFACES. THE MANUFACTURER ADVISED OWNERS TO MAINTAIN
    PROPER TIRE INFLATION. THE MANUFACTURER WAS NOTIFIED AND MADE AWARE
25
    OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 20.
    1 Affected Product
26
27
    October 14, 2009 NHTSA ID NUMBER: 10287346
28
    Components: STEERING
                                        -153-
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Class Action Complaint

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NHTSA ID Number: 10287346
 1
    Incident Date September 28, 2009
2
    Consumer Location WILMOT, NH
    Vehicle Identification Number 1FTWF31525E****
3
    Summary of Complaint
4
    CRASHNo
    FIRENo
5
    INJURIES0
    DEATHS0
6
    TL*THE CONTACT OWNS 2005 FORD F350 SUPERDUTY. WHILE DRIVING
7
    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
8
    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
9
    FAILURE. THE MECHANIC STATED THAT NOTHING WAS WRONG WITH THE VEHICLE.
10
    HE CONTACT NOTIFIED THE MANUFACTURER; HOWEVER, THEY HAVE NOT
    RESPONDED. THE CURRENT AND THE FAILURE MILEAGES WERE 50,000.
11
    1 Affected Product
12
13
    December 20, 2011 NHTSA ID NUMBER: 10440552
    Components: STEERING
14
    NHTSA ID Number: 10440552
15
    Incident Date December 20, 2010
    Consumer Location MILLER PLACE, NY
16
    Vehicle Identification Number 1FTWX31515E****
    Summary of Complaint
17
    CRASHNo
18
    FIRENo
    INJURIES0
19
    DEATHS0
20
    TL* THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT THE
    VEHICLE WOULD SHAKE VIOLENTLY WHILE DRIVING OVER 50 MPH. THE
21
    MANUFACTURER WAS NOTIFIED OF THE FAILURE, BUT DENIED ANY ASSISTANCE
    WITH REPAIRS TO THE VEHICLE. THE CONTACT MADE ATTEMPTS TO REPAIR THE
22
    FAILURE, BUT THE DEFECT CONTINUOUSLY RECURRED. THE FAILURE MILEAGE WAS
    45,000 AND THE CURRENT MILEAGE WAS 60,000.
23
    1 Affected Product
24
25
    January 16, 2013 NHTSA ID NUMBER: 10493165
26
    Components: STEERING
    NHTSA ID Number: 10493165
27
    Incident Date January 1, 2007
    Consumer Location FELTON. CA
28
    Vehicle Identification Number N/A
                                         -154-
    Class Action Complaint
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Summary of Complaint
 1
    CRASHNo
2
    FIRENo
   INJURIES0
3
    DEATHSO
4
    TL* THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT WHILE
    DRIVING APPROXIMATELY 60 MPH, THE STEERING WHEEL AND FRONT END OF THE
5
    VEHICLE STARTED TO SHAKE. THE CONTACT RELEASED THE ACCELERATOR PEDAL
    AND THE SHAKING BECAME MORE EXTREME. AFTER DEPRESSING THE BRAKES, THE
6
    VEHICLE WAS MOVED OFF THE ROADWAY AND THE CONTACT INSPECTED THE
7
    VEHICLE. THE CONTACT FOUND NOTHING LOOSE OR HANGING. THE VEHICLE WAS
    THEN TAKEN TO A DEALER WHERE THE CONTACT WAS INFORMED THAT THE VEHICLE
8
    WAS PERFORMING NORMALLY WHEN DRIVING AT HIGHWAY SPEEDS. THE
    MANUFACTURER WAS CONTACTED BUT OFFERED NO ASSISTANCE. THE FAILURE
9
    MILEAGE WAS APPROXIMATELY 20,000. THE CURRENT MILEAGE WAS APPROXIMATELY
10
    62,000. THE VIN WAS UNAVAILABLE.
    1 Affected Product
11
12
    May 5, 2016 NHTSA ID NUMBER: 10863336
13
    Components: SUSPENSION, ELECTRONIC STABILITY CONTROL
    NHTSA ID Number: 10863336
14
    Incident Date April 28, 2016
15
    Consumer Location TEMPLE, TX
    Vehicle Identification Number 1FTWW33P75E****
16
    Summary of Complaint
    CRASHNo
17
    FIRENo
18
   INJURIES0
    DEATHSO
19
    TL* THE CONTACT OWNS A 2005 FORD F-350. THE CONTACT STATED WHILE DRIVING AT
    APPROXIMATELY 65 MPH, THE VEHICLE VIOLENTLY SHOOK. THE FAILURE OCCURRED
20
    WITHOUT WARNING. THE VEHICLE WAS TAKEN TO INDEPENDENT MECHANIC WHERE
21
    IT WAS DIAGNOSED THE VEHICLE HAD A FRONT END OSCILLATION AND THAT TRACK
    BAR. STABILIZER LINK, AND UPPER AND LOWER BALL JOINTS NEEDED TO BE
22
    REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED
    OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 127,000.
23
    1 Affected Product
24
25
    March 17, 2010 NHTSA ID NUMBER: 10320462
26
    Components: STEERING
    NHTSA ID Number: 10320462
27
    Incident Date March 17, 2009
    Consumer Location OROVILLE, CA
28
    Vehicle Identification Number 1FTSW21P76E****
                                        -155-
    Class Action Complaint
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Summary of Complaint
 1
    CRASHNo
2
    FIRENo
    INJURIES0
3
    DEATHSO
4
    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
    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
6
    WOULD OCCUR SEVERAL TIMES WHILE OPERATING THE VEHICLE. THE
7
    MANUFACTURER WAS CONTACTED AND ADVISED TAKING THE VEHICLE TO THE
    DEALER FOR FURTHER INSPECTION. THERE HAD BEEN NO REPAIRS TO THE VEHICLE
8
    AS OF YET. THE FAILURE MILEAGE WAS 18,000 AND THE CURRENT MILEAGE WAS
    28,000.
9
    1 Affected Product
10
11
    April 7, 2014 NHTSA ID NUMBER: 10577858
12
    Components: STEERING
    NHTSA ID Number: 10577858
13
    Incident Date May 2, 2011
    Consumer Location OREFIELD, PA
14
    Vehicle Identification Number 1FTSX21536E****
15
    Summary of Complaint
    CRASHNo
16
    FIRENo
    INJURIES0
17
    DEATHS0
18
    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
19
    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
20
    OCCASIONS. THE VEHICLE SHOOK VIOLENTLY AND THE STEERING CONTINUED TO BE
21
    UNSTABLE. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHO WAS UNABLE
    TO DIAGNOSE THE FAILURE. THE CONTACT CONTINUED TO EXPERIENCE THE
22
    STEERING FAILURE WHICH CAUSED THE VEHICLE TO DRIVE ROUGH. THE VEHICLE
    WAS TAKEN BACK TO AN AUTHORIZED DEALER WHO WAS UNABLE TO REPLICATE THE
23
    FAILURE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE
24
    APPROXIMATE FAILURE MILEAGE WAS 50000.
    1 Affected Product
25
26
    April 19, 2010 NHTSA ID NUMBER: 10326393
27
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 10326393
28
    Incident Date April 17, 2010
                                        -156-
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Class Action Complaint

1 **Consumer Location SHELTER ISLAND. NY** Vehicle Identification Number 1FTSX21516E**** 2 **Summary of Complaint CRASHNo** 3 **FIRENo** 4 **INJURIES0 DEATHSO** 5 2006 FORD F-250 SUPER DUTY GAS 5.4L V8 I WAS ON THE HIGHWAY DRIVING AROUND 70 WHEN I HIT A POT HOLE THE STEERING WHEEL JERKED LIKE NORMAL BUT THEN 6 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 OFF THE ROAD WITH OUT CAUSING AN ACCIDENT. I SPENT ABOUT AN HOUR TRYING 8 TO FIGURE OUT WHAT HAPPENED. WITH NO FINDINGS I STARTED TO DRIVE HOME VERY SLOWLY AFRAID TO GO OVER 50. I TYPED IN GOOGLE.COM FORD F250 SHAKING 9 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 GIVEN A CASE NUMBER. ALL THE DEALERSHIP BLAME IT ON TIRE PRESSURE. AND 11 MOST OF THEM STATE THAT THE PRESSURE NEEDS TO BE GREATER THEN LISTED ON THE DOOR OF THE TRUCK. I AM TRULY AMAZED I WAS NOT HURT OR EVEN MORE 12 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 ARTICLES IN A FEW MAJOR MAGAZINES AND TV SHOWS REGARDING THIS ISSUE. I AM 14 NOW GOING TO INCREASE MY TIRE PRESSURE AND SEE IF THAT CURES THE PROBLEM. IF NOT I AM GOING TO BE FORCED TO BUY AFTER MARKET PARTS TO FIX THE 15 PROBLEM, COSTING \$ 1,000 MIN. 16 I DON'T MIND THE PRICE FOR THE SAFETY OF MY WIFE AND PASSENGERS. BUT I WOULD THINK THAT FORD MOTOR COMPANY WOULD STAND BEHIND THERE 17 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 18 ME, OTHER THEN THAT HAPPENING AT HIGHWAY SPEEDS, THE VEHICLE HANDLES 19 GREAT AND NO PROBLEMS. *TR 1 Affected Product 20 21 June 26, 2009 NHTSA ID NUMBER: 10275011 22 **Components: STEERING** NHTSA ID Number: 10275011 23 **Incident Date** April 2, 2009 24 **Consumer Location** Unknown Vehicle Identification Number 1FTSW21P46E**** 25 **Summary of Complaint CRASHNo** 26 **FIRENo** 27 **INJURIES0 DEATHS0** 28

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Class Action Complaint

WHEN DRIVING WHEN YOU GO OVER A BUMP, RXR CROSSING OR MAN HOLE COVER 1 THE FRONT END OF THE VEHICLE SEVERELY SHAKES TO THE POINT YOU HAVE TO JAM 2 ON THE BRAKES OR WRECK. I REPLACED THE STEERING STABILIZER AS INSTRUCTED TO BUT THE OUTCOME HAS NOT CHANGED. I HAVE CALLED FORD NUMEROUS 3 TIMES, BOTH THE DEALER AND FORD MANUFACTURER. THEY BOTH ACT LIKE THEY HAVE NEVER HEARD OF THIS SEVERE PROBLEM. *TR 4 **1 Affected Product** 5 6 December 13, 2011 NHTSA ID NUMBER: 10439726 7 **Components: STEERING** NHTSA ID Number: 10439726 8 **Incident Date** December 12, 2009 **Consumer Location ERIE, PA** 9 Vehicle Identification Number 1FTFX21536E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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. 14 THE VEHICLE WAS TAKEN TO THE DEALER PREVIOUSLY WHO REPLACED THE TIRES, 15 SHOCKS AND OTHER UNKNOWN COMPONENTS, BUT THE VEHICLE CONTINUED TO SHAKE UNCONTROLLABLE. THE DEALER WAS UNABLE TO LOCATE THE PROBLEM. THE 16 MANUFACTURER WAS NOTIFIED OF THE FAILURE WHO INFORMED THE CONTACT TO TAKE THE VEHICLE BACK TO THE DEALER FOR FURTHER TESTING. THE 17 FAILURE MILEAGE WAS 90,000 AND THE CURRENT MILEAGE WAS 109,000. 18 1 Affected Product 19 20 January 26, 2012 NHTSA ID NUMBER: 10445440 **Components: STEERING** 21 NHTSA ID Number: 10445440 **Incident Date** May 2, 2011 22 **Consumer Location** Unknown 23 Vehicle Identification Number 1FTSX21516E**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHS0** 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 DEALER ATTEMPTED TO REPAIR THE VEHICLE, BUT THE FAILURE RECURRED. THE 28 -158-

Class Action Complaint

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MANUFACTURER WAS NOTIFIED, BUT DENIED ANY ASSISTANCE WITH REPAIRS.
 1
    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
    Components: SUSPENSION
5
    NHTSA ID Number: 10272981
    Incident Date September 13, 2008
6
    Consumer Location TWIN BRIDGES, MT
7
    Vehicle Identification Number 1FTWW31P36E****
    Summary of Complaint
8
    CRASHNo
    FIRENo
9
    INJURIES0
10
    DEATHSO
    TL*THE CONTACT OWNS A 2006 FORD F-350. WHILE DRIVING APPROXIMATELY 65 MPH,
11
    THE VEHICLE DROVE OVER A BUMP IN THE ROAD. THE STEERING WHEEL VIBRATED
12
    AND SHIMMIED SEVERELY. THE VEHICLE BEGAN TO VEER ACROSS THE ROAD
    WITHOUT ASSISTANCE. THE FAILURES OCCURRED WHENEVER THE VEHICLE
13
    TRAVELED OVER ROUGH ROAD SURFACES. THE VEHICLE WAS TAKEN TO AN
    INDEPENDENT MECHANIC FOR INSPECTION AND THEY STATED THAT THE FRONT
14
    SUSPENSION WAS FAULTY DUE TO A MANUFACTURER DESIGN DEFECT. THE
15
    MANUFACTURER WAS NOTIFIED, BUT DID NOT ASSIST. THE CONTACT WAS ADVISED
    TO CHECK THE TIRE INFLATION PRESSURE. THE CONTACT IS IN THE PROCESS OF
16
    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
17
    1 Affected Product
18
    1 Associated Document
19
    February 11, 2014 NHTSA ID NUMBER: 10563867
20
    Components: SUSPENSION, STEERING
21
    NHTSA ID Number: 10563867
    Incident Date May 2, 2011
22
    Consumer Location VICHY, MO
23
    Vehicle Identification Number 1FTWW33P36E****
    Summary of Complaint
24
    CRASHNo
    FIRENo
25
    INJURIES0
26
    DEATHSO
    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
    STEERING WHEEL EXPERIENCED SEVERE VIBRATION AFTER THE CONTACT DROVE
28
    OVER A ROAD DIP. THE CONTACT STATED THAT THE DEFECT WOULD RECUR WHEN
                                        -159-
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Class Action Complaint

DRIVING AT ANY SPEED AND ANYTIME THE VEHICLE WAS DRIVEN OVER A DIP OR 1 ROAD WINE. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER 2 WAS NOTIFIED AND NO SOLUTION WAS OFFERED. THE FAILURE MILEAGE WAS 60,000. 3 **1 Affected Product** 4 5 May 26, 2016 NHTSA ID NUMBER: 10871068 Components: SUSPENSION, STEERING 6 NHTSA ID Number: 10871068 7 **Incident Date** May 20, 2016 Consumer Location SANDWICH, MA 8 Vehicle Identification Number 1FTWW31566E**** 9 **Summary of Complaint CRASHNo** 10 **FIRENo INJURIES0** 11 **DEATHS0** 12 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 13 MORE EVENTS AT SLOWER SPEEDS AND THE SHAKING IS ALMOST UNMANAGEABLE NOW. WEDNESDAY MAY 11 APPROX 1PM EXITING THE BOURNE BRIDGE MA. I WAS 14 DRIVING AT APPROX 40MPH AND EXITING THE BRIDGE. THERE WAS A ROUGH 15 CONSTRUCTION PATCH ON THE ROAD RIGHT WHERE THE ROAD CONNECTS TO THE BRIDGE. AS I HIT THE ROUGH PATCH, THE OSCILLATION BEGAN AND THE TRUCK 16 SHOOK UNCONTROLLABLY APPROACHING THE ROTARY. THERE WAS A LOT OF TRAFFIC AND CARS IN THE LANE BESIDE ME THAT COULD HAVE BEEN DAMAGED. 17 MAY 20, 2016 AT APPROX 5PM. MY HUSBAND WAS DRIVING WEST ON HIGHWAY ROUTE 18 6, CAPE COD MA AT APPROX 55MPH. AS HE PASSED EXIT 6, HE HIT A ROUGH PATCH AND THE TRUCK BEGAN OSCILLATING VIOLENTLY. HE WAS UNABLE TO CONTROL IT 19 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 20 CONTROL AND NO ONE WAS HURT OTHER THAN MY HUSBAND BEING TOTALLY 21 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 22 OTHERS WHO ARE ON THE ROAD. I HAVE CONTACTED THE PLYMOUTH FORD DEALER WHERE THE TRUCK WAS PURCHASED, FORD CUSTOMER SERVICE AND FORD HEAD 23 OFFICE. EVEN THOUGH THEY ACKNOWLEDGE THE TRUCKS ARE DEFECTIVE, THEY SAY 24 THEY ARE NOT RESPONSIBLE FOR REPAIRING THEM. OUR TRUCK IS OSCILLATING REALLY BADLY AND IS DANGEROUS TO DRIVE. THIS SHOULD BE A RECALL, NOT ONLY 25 FOR THOSE OF US DRIVING THESE DEFECTIVE FORD F-350 2006 TRUCKS, BUT FOR THE OTHER INNOCENT LIVES ON THE ROAD. 26 **1 Affected Product** 27

June 13, 2016 NHTSA ID NUMBER: 10873902

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Class Action Complaint

Case No.

28

1 **Components: SUSPENSION** NHTSA ID Number: 10873902 2 **Incident Date June 5, 2012** Consumer Location STERLINGTON, LA 3 Vehicle Identification Number 1FTWW33P26E**** 4 **Summary of Complaint CRASHNo** 5 **FIRENo INJURIES0** 6 **DEATHS0** 7 TL* THE CONTACT OWNS A 2006 FORD F-350. WHILE DRIVING 65 MPH OVER BUMPS IN THE ROAD, THE VEHICLE SHOOK VIOLENTLY. THE DEALER DIAGNOSED THAT THE 8 FRONT AXLE FAILED AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED BECAUSE THE REMEDY WAS NOT AVAILABLE. THE MANUFACTURER WAS 9 NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS UNKNOWN. 10 **1 Affected Product** 11 12 January 16, 2014 NHTSA ID NUMBER: 10560235 **Components: STEERING** 13 NHTSA ID Number: 10560235 **Incident Date** November 2, 2012 14 Consumer Location THEODORE, AL 15 Vehicle Identification Number 1FTWW33P46E**** **Summary of Complaint** 16 **CRASHNo FIRENo** 17 **INJURIES0** 18 **DEATHS0** DRIVING VEHICLE WITH FIFTH WHEEL 31 FT CAMPER IN TOW VEHICLE LURCHED TO 19 THE LEFT AND ATTEMPTS TO CORRECT FOUND GREAT RESISTANCE IN STEERING RESPONSE. ON SEVERAL OCCASIONS SINCE AND AT NO SPECIFIC SPEED THE VEHICLE 20 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 MOTOR CO DESCRIBING THE EXACT STEERING SITUATION THAT I AM EXPERIENCING ALONG WITH RECOMMENDATIONS TO KEEP TIRES INFLATED PROPERLY, WHICH I 23 HAVE AND CONTINUE TO HAVE CORRECT. I CONTACTED FORD TO VOICE MY CONCERN 24 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 25 "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 26 SPEEDS, EVEN HIGHWAY SPEEDS OF 70MPH. I WAS ALSO TOLD THAT THE LETTER WAS 27 ONLY A "NOTIFICATION OF THE SITUATION AND HOW TO AVOID" AND NOT A RECALL.

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MY COST TO ENSURE THAT THIS WAS THE CAUSE OF THE PROBLEM. THIS SITUATION IS

FURTHERMORE, FORD ADVISED THAT I TAKE THE VEHICLE IN TO A FORD DEALER AT

Class Action Complaint

Case No.

28

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

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May 24, 2009 NHTSA ID NUMBER: 10269838 6

Components: SUSPENSION 7 NHTSA ID Number: 10269838 **Incident Date** January 11, 2009 8 **Consumer Location** Unknown

9 Vehicle Identification Number N/A

Summary of Complaint

10 **CRASHNo FIRENo** 11

INJURIES0

12

DEATHS0 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 SOMETIMES IT GOES AWAY OUICKLY WHEN I SLOW DOWN AND SOMETIMES I HAVE SLOW DOWN BELOW 30MPH. HOW SAFE IS THAT ON AN INTERSTATE? I DID RECEIVE A LETTER FROM FORD SAYING THIS COMMON BUT I DISAGREE BECAUSE THIS IS MY 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 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 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 PROBLEM IS BECAUSE A GAS ENGINE IS TOO LIGHT AND THE SUPERDUTYS WERE MADE FOR DIESEL ENGINES. I HAVE NO IDEA HOW TRUE THIS IS BUT MY FIRST TWO 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 NOW IT IS ON MY NICKEL. I EVEN PUT NEW E RATED TIRES ON THE TRUCK IN DECEMBER AND HAS BEEN AT THE DEALERSHIP TWICE WHICH THEY SAID THE TIRES 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

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EITHER. I AM GOING TO GET A SECOND OPINION FROM MY MECHANIC THAT I HAVE BEEN USING FOR OVER 20 YEARS WHICH IS NOT A FORD DEALERSHIP TO SEE IF THE

PROBLEM CAN BE RESOLVED SINCE I AM NOT GETTING MUCH HELP FROM FORD OR

DO NOT FEEL I AM VERY SAFE IN KEEPING THIS BIG PICKUP UNDER

THE DEALERSHIP. THIS SHIMMY / VIBRATION DOES GET ME NERVOUS AT TIMES AND

Class Action Complaint Case No.

CONTROL AND I DO NOT EXCEED THE SPEED LIMIT MORE THAN 5 MPH. I HAVE BEEN A 1 FORD PERSON FOR OVER THIRTY YEARS AND NOW I MAY HAVE TO CHANGE. *TR 2 1 Affected Product 3 4 October 15, 2009 NHTSA ID NUMBER: 10288585 **Components: STEERING, SUSPENSION** 5 NHTSA ID Number: 10288585 Incident Date October 13, 2009 6 Consumer Location TEWKSBURY, MA 7 Vehicle Identification Number 1FDWX37Y86E**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHSO** EXCESSIVE FRONT END SHIMMY ON OCCASION WITH MY FORD F350 4X4. I HAVE 11 RECEIVED A LETTER FROM FORD DISCUSSING THIS ISSUE. THE FIRST TIME THE 12 PROBLEM OCCURRED, MY TIRE PRESSURE WAS LOW AND SUBSEQUENTLY MAINTAINING PROPER TIRE PRESSURE SEEMED TO PREVENT THE PROBLEM FOR A 13 WHILE. HOWEVER, RECENTLY I HIT SOME BUMPS WHILE TRAVELING ON THE HIGHWAY AT A SPEED OF APPROXIMATELY 65 MPH AND THE FRONT END BEGAN TO 14 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 THE PROPER WAY TO FIX THE PROBLEM. I THEN CALLED FORD CUSTOMER SERVICE 17 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 I FIND ONE THAT HAS EXPERIENCE WITH TRYING TO FIX THIS PARTICULAR 19 **PROBLEM**. I HAVE DONE THAT AND I HAVE FOUND THAT NONE OF THE LOCAL DEALERS KNOW HOW TO CORRECT THE PROBLEM. THIS SHIMMY PROBLEM IS 20 OCCURRING MORE AND MORE OFTEN AND I AM CONVINCED THAT IT WILL 21 EVENTUALLY RESULT IN AN ACCIDENT ON THE HIGHWAY. *TR 1 Affected Product 22 23 July 22, 2009 NHTSA ID NUMBER: 10277958 24 **Components: STEERING** NHTSA ID Number: 10277958 25 **Incident Date** November 12, 2008 26 Consumer Location PIEDMONT. OK Vehicle Identification Number N/A 27 **Summary of Complaint CRASHNo** 28 **FIRENo** -163-Class Action Complaint

1 **INJURIES0 DEATHS0** 2 3 4

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. THE
- MANUFACTURER IS AWARE OF THE FAILURE, BUT WILL NOT PROVIDE
- COMPENSATION BECAUSE THE VEHICLE WAS NOT INCLUDED IN A RECALL AND 6
 - THE WARRANTY WAS EXPIRED. 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 8 VIN WAS UNAVAILABLE. THE FAILURE MILEAGE WAS 34,000 AND CURRENT MILEAGE
- WAS 62,000. 9
 - **1 Affected Product**

10 11

5

7

- May 28, 2013 NHTSA ID NUMBER: 10513794
- 12 Components: STEERING, WHEELS, STRUCTURE, SUSPENSION
- NHTSA ID Number: 10513794 13
- **Incident Date** May 26, 2013
- **Consumer Location AUSTIN, TX** 14
 - Vehicle Identification Number 1FTSW21537E****
- 15 **Summary of Complaint**
- **CRASHNo**
- 16 **FIRENo**
- **INJURIES0** 17
 - **DEATHS0**
- 18 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 19 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
- 20 EXPERIENCING TURBULENT WOBBLING WITH THIS TRUCK AND I CAN ASSURE YOU
- 21 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
- 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 23
- UNEVEN SECTION OF THE HIGHWAY AND OUR TRUCK SUDDENLY STARTED SHAKING
- 24 DANGEROUSLY OUT OF CONTROL! THANKFULLY MY HUSBAND WAS ABLE TO
- CONTROL THE STEERING WHEEL AND STEPPED ON THE BRAKE TO SLOW IT DOWN, 25 OTHERWISE WHO KNOWS WHAT WOULD HAVE HAPPENED! THERE WAS TRAFFIC
- EVERYWHERE AND WE WERE LUCKY ENOUGH NOT TO HAVE AN ACCIDENT! THEN IT 26 HAPPENED AGAIN A FEW HOURS LATER WHEN WE AGAIN DROVE OVER AN UNEVEN
- 27 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 28 CAN HONESTLY SAY THERE IS SOMETHING VERY WRONG WITH THIS VEHICLE. THIS IS

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Class Action Complaint

A SAFETY ISSUE AND PEOPLE CAN AND WILL LOSE THEIR LIVES OVER THIS IF THIS IS 1 NOT RESOLVED IMMEDIATELY! I HAVE CONTACTED FORD HEADQUARTERS TO 2 SUBMIT A FORMAL COMPLAINT AND THEY MERELY TOLD ME TO CONTINUE WORKING WITH THE DEALERSHIP THAT HAS UNRESOLVED MY ISSUE. I TRUST 3 THAT YOU WILL TAKE THIS COMPLAINT SERIOUSLY AS LIVES ARE AT STAKE BECAUSE OF THIS ISSUE. *TR 4 **1 Affected Product** 5 6 January 27, 2009 NHTSA ID NUMBER: 10256489 7 **Components: STEERING, WHEELS** NHTSA ID Number: 10256489 8 **Incident Date** October 30, 2007 Consumer Location CITY OF INDUSTRY, CA 9 Vehicle Identification Number 1FTSW21P47E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 DURING THE FAILURES. HIS CONTROL OF THE VEHICLE WAS SIGNIFICANTLY REDUCED. 15 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 16 IS WAITING FOR A RESPONSE. THE FAILURE MILEAGE WAS 300 AND CURRENT MILEAGE WAS 31,100. 17 1 Affected Product 18 19 June 28, 2016 NHTSA ID NUMBER: 10877122 Components: STEERING, SERVICE BRAKES 20 NHTSA ID Number: 10877122 21 **Incident Date June 20, 2007** Consumer Location GREENTOWN, PA 22 Vehicle Identification Number 1FTNF21507E**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 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 27 DIFFICULT TO STEER AND THE ENTIRE VEHICLE OSCILLATED, IN ADDITION, THE ABS WARNING LIGHT ILLUMINATED. THE VEHICLE WAS TAKEN TO THE DEALER, BUT WAS 28 NOT DIAGNOSED OR REPAIRED. THE FAILURES BEGAN WEEKS AFTER THE VEHICLE -165-Class Action Complaint

WAS PURCHASED IN 2007. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. 1 THE FAILURE MILEAGE WAS APPROXIMATELY 400. 2 1 Affected Product 3 4 May 7, 2018 NHTSA ID NUMBER: 11092264 **Components: SUSPENSION** 5 NHTSA ID Number: 11092264 **Incident Date** May 1, 2018 6 Consumer Location NORTH HAVEN, CT 7 **Vehicle Identification Number** 1FTWF31567E**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHS0** 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 WOULD BE A DIAGNOSTIC FEE. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED DUE 14 TO THE DIAGNOSTIC FEE. THE MANUFACTURER WAS NOTIFIED AND ADVISED THE 15 CONTACT TO TAKE THE VEHICLE TO THE LOCAL DEALER, AND THAT THERE WOULD BE A CHARGE FOR VEHICLE INSPECTIONS. THE FAILURE MILEAGE WAS 16 APPROXIMATELY 7,000. 1 Affected Product 17 18 October 15, 2010 NHTSA ID NUMBER: 10360616 19 Components: STEERING, SUSPENSION, EQUIPMENT 20 NHTSA ID Number: 10360616 **Incident Date** October 11, 2010 21 **Consumer Location MANASSAS, VA** Vehicle Identification Number 1FTWW31P17E**** 22 **Summary of Complaint** 23 **CRASHNo FIRENo** 24 **INJURIES0 DEATHS0** 25 2007 FORD F-350 CREW CAB SRW 4X4, STEERING OSCILLATION (WOBBLE). HAVE 26 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 27 WOBBLE HAPPENS WHEN CROSSING UNEVEN PAVEMENT, CONCRETE, DIPS IN THE ROAD, RAILROAD CROSSINGS (AT SLOW SPEEDS). HAPPENS WHILE EMPTY AND WHEN 28 TOWING A FLATBED GOOSENECK TRAILER AND/OR MY 5TH WHEEL RV. THIS HAS NOT -166-

Class Action Complaint

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BEEN RESOLVED BY FORD YET AND THEY DON NOT KNOW HOW TO FIX. I BELIEVE IT IS
 1
    A BAD STEERING BOX?? THEY ONLY WANT TO USE US/ME AS "GUINEA PIGS" TO FIX.
2
    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
3
   INTERNET THIS PROBLEM HAS BEEN GIVEN THE "DEATH WOBBLE" NICKNAME. I
4
    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
5
   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
6
    UNSAFE TO DRIVE AT ANY SPEED AND THERE NEEDS TO BE A WAY GET TO THE
7
   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
8
    TO CONSULT LEGAL HELP. I JUST SPOKE WITH FORD CUSTOMER SERVICE
   (COMPLAINT #[XXX]) AND ONCE AGAIN THEY SAID TAKE IT TO ANOTHER DEALER
9
   AND MAYBE I'LL HAVE BETTER LUCK.????? PLEASE HELP AND RESPOND.[XXX]
10
    INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA),
    5 U.S.C. 552(B)(6)
11
    1 Affected Product
12
13
    January 8, 2016 NHTSA ID NUMBER: 10818907
    Components: SERVICE BRAKES, SUSPENSION
14
    NHTSA ID Number: 10818907
15
   Incident Date January 1, 2012
    Consumer Location WOOD RIVER, IL
16
    Vehicle Identification Number 1FTWW31P97E****
   Summary of Complaint
17
    CRASHNo
18
   FIRENo
   INJURIES0
19
    DEATHS0
   TL* THE CONTACT OWNS A 2007 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 55
20
    MPH OVER A BUMP, THE FRONT END OF THE VEHICLE AND STEERING WHEEL BEGAN
21
    TO VIBRATE VIOLENTLY. THE FAILURE OCCURRED WHEN DRIVING 55 MPH OR
   GREATER OVER AN UNEVEN ROAD SURFACE OR BUMP. THE CONTACT REPAIRED THE
22
    VEHICLE HIMSELF. THE FRONT SHOCKS, ROTORS, AND BRAKES WERE REPLACED. IN
    ADDITION, THE FRONT WHEEL BEARINGS WERE REPLACED WITH FOUR NEW TIRES
23
    INSTALLED ON THE VEHICLE. THE FAILURE PERSISTED AFTER THE REPAIRS. THE
24
    MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE
    MILEAGE WAS 100,000.
25
    1 Affected Product
26
27
    June 30, 2015 NHTSA ID NUMBER: 10731192
    Components: SUSPENSION
28
    NHTSA ID Number: 10731192
                                        -167-
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Class Action Complaint Case No.

```
Incident Date June 1, 2015
 1
    Consumer Location PINEY FLATS, TN
2
    Vehicle Identification Number 1FTSW21R98E****
    Summary of Complaint
3
    CRASHNo
4
    FIRENo
    INJURIES0
5
    DEATHS0
    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
    MECHANIC. THE TECHNICIAN REPLACED THE TRACK BAR, THE FRONT STEERING
8
    DAMPER, THE CENTER LINK, AND THE FRONT SUSPENSION; HOWEVER, THE FAILURE
    WAS NOT CORRECTED. THE MANUFACTURER WAS NOTIFIED. THE FAILURE MILEAGE
9
    WAS 159,000. MA 09/03/15
10
    1 Affected Product
    1 Associated Document
11
12
    November 9, 2018 NHTSA ID NUMBER: 11150428
13
    Components: SUSPENSION
    NHTSA ID Number: 11150428
14
    Incident Date October 26, 2018
15
    Consumer Location Unknown
    Vehicle Identification Number 1FTSW21R48E****
16
    Summary of Complaint
    CRASHNo
17
    FIRENo
18
    INJURIES0
    DEATHSO
19
    TL* THE CONTACT OWNS A 2008 FORD F-250. WHILE DRIVING 40 MPH, THE VEHICLE
    SHOOK. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC, BUT WAS NOT
20
    DIAGNOSED OR REPAIRED. THE MECHANIC STATED THAT THE VEHICLE EXHIBITED
21
    THE SAME SYMPTOMS AS LISTED IN NHTSA CAMPAIGN NUMBER: 08E026000
    (EOUIPMENT). THE MANUFACTURER WAS NOTIFIED AND TRANSFERRED THE
22
    CONTACT TO NHTSA. THE DEALER WAS NOT CONTACTED. THE FAILURE MILEAGE
    WAS APPROXIMATELY 186,000.
23
    1 Affected Product
24
    Request Research (Services fees apply)
25
26
    March 13, 2010 NHTSA ID NUMBER: 10319436
    Components: SUSPENSION
27
    NHTSA ID Number: 10319436
    Incident Date March 12, 2010
28
    Consumer Location RAYMOND, NH
                                         -168-
    Class Action Complaint
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Class Action Complaint Case No.

Summary of Complaint

28

Vehicle Identification Number 1FTWW31R38E****

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CRASHNo
 1
    FIRENo
2
    INJURIES0
    DEATHS0
3
   TL* THE CONTACT OWNS A 2008 FORD F-350. THE CONTACT STATED THAT WHILE
4
    DRIVING OVER 40 MPH, THE VEHICLE WOBBLED AND VIOLENTLY VIBRATED WITHOUT
    WARNING. THE VEHICLE WAS TAKEN TO A DEALER ON MULTIPLE OCCASIONS:
5
    HOWEVER, THE FAILURE WAS UNABLE TO BE DETERMINED. THE VEHICLE WAS NOT
    REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE
6
    MILEAGE WAS 80,000.
7
    1 Affected Product
8
9
    March 9, 2017 NHTSA ID NUMBER: 10959732
    Components: STEERING, SUSPENSION
10
    NHTSA ID Number: 10959732
    Incident Date December 19, 2016
11
    Consumer Location KING, NC
12
    Vehicle Identification Number 1FTWW33R98E****
    Summary of Complaint
13
    CRASHNo
    FIRENo
14
    INJURIES0
15
    DEATHSO
    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
    AND SUSPENSION. A DEALER PERFORMED EXTENSIVE REPAIRS, BUT THE CONDITION
17
    CONTINUED. THE DEALER AND THE MANUFACTURER FAILED TO PROVIDE A
18
    REMEDY. THE VEHICLE WAS UNABLE TO BE SAFELY DRIVEN DUE TO A STRONG
    VIBRATION FROM THE STEERING, WHICH ALSO CAUSED THE SUSPENSION TO BE
19
    UNSTABLE. THE VEHICLE WAS PARKED AT THE CONTACT'S RESIDENCE. THE FAILURE
    MILEAGE WAS NOT AVAILABLE.
20
    1 Affected Product
21
22
    March 17, 2009 NHTSA ID NUMBER: 10262107
23
    Components: STEERING
    NHTSA ID Number: 10262107
24
    Incident Date June 10, 2008
    Consumer Location Unknown
25
    Vehicle Identification Number 1FDWW35R08E****
26
    Summary of Complaint
    CRASHNo
27
    FIRENo
    INJURIES0
28
    DEATHSO
                                        -170-
    Class Action Complaint
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TL*THE CONTACT OWNS A 2008 FORD F-350 SD. THE CONTACT STATED THAT THE 1 FRONT END OF THE VEHICLE WOULD SHIMMY AND SHAKE WHILE DRIVING 2 APPROXIMATELY 50 MPH. ON ONE OCCASION, THE STEERING WHEEL SHOOK SO SEVERELY THAT HE LOST CONTROL OF THE VEHICLE AND VEERED OFF THE ROAD. 3 THERE WERE NO INJURIES. THE CONTACT TOOK THE VEHICLE TO THE DEALER FOR 4 REPAIRS, BUT THE FAILURE PERSISTED. HE FILED A COMPLAINT WITH THE MANUFACTURER, BUT HAS YET TO RECEIVE ANY FEEDBACK. THE CURRENT 5 MILEAGE WAS APPROXIMATELY 42,600 AND FAILURE MILEAGE WAS APPROXIMATELY 15,000. 6 **1 Affected Product** 7 8 January 25, 2012 NHTSA ID NUMBER: 10445228 9 **Components: STEERING** NHTSA ID Number: 10445228 10 **Incident Date** April 21, 2010 Consumer Location NAVARRO, CA 11 Vehicle Identification Number 1FTWX31R38E**** 12 **Summary of Complaint CRASHNo** 13 **FIRENo INJURIES0** 14 **DEATHS0** 15 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 ON ROUGH ROAD SURFACES. THE VEHICLE WAS TAKEN TO THE DEALER NUMEROUS TIMES FOR THE FAILURE. THE DEALER REPLACED THE TRACK LINK AND THE 17 STEERING GEARBOX BUT THE FAILURE WAS NOT CORRECTED AND THE VEHICLE 18 CONTINUED TO VIBRATE EXCESSIVELY. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE BUT THE VEHICLE WAS NOT FURTHER REPAIRED. THE FAILURE 19 MILEAGE WAS 100 AND THE CURRENT MILEAGE WAS 20,000. **1 Affected Product** 20 21 December 30, 2015 NHTSA ID NUMBER: 10817038 22 Components: VISIBILITY/WIPER, STEERING, SUSPENSION 23 NHTSA ID Number: 10817038 **Incident Date** December 11, 2015 24 Consumer Location SATSUMA, AL Vehicle Identification Number 1FTSW21R79E**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHS0** 28 -171-

Class Action Complaint

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DRIVING 2009 FORD F-50 SUPER DUTY FX4 ON INSTERSTATE AT 65 MPH. AS I EXITED TO
 1
    ANOTHER INTERSTATE I EXPERIENCED A VIOLENT WOBBLE IN THE FRONT END WHICH
2
    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
3
    SHOPPING LIST OF $3300. THIS INCLUDED WINDSHIELD WIPERS. THEY ALSO DID NOT
4
    KNOW WHAT CAUSED THIS PROBLEM. FORD CUSTOMER SERVICE SAID THEY DID
    NOT KNOW OF THIS PROBLEM AND COULD NOT HELP. LOOKING INTO THIS ON
5
    GOOGLE, I FOUND HUNDREDS OF SIMILAR PROBLEMS COMMONLY CALLED "DEATH
    WOBBLE" ON THE INTERNET. THIS VIOLENT SHAKING HAS OCCURRED ONCE MORE
6
    TWO WEEKS LATER. I AM PARKING THE VEHICLE UNTIL I DECIDE WHAT I NEED TO DO.
7
    I AM AFRAID FOR MY FAMILY'S SAFETY AND OTHER MOTORISTS. *JS
    1 Affected Product
8
9
    June 2, 2016 NHTSA ID NUMBER: 10872235
10
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 10872235
11
    Incident Date March 10, 2016
12
    Consumer Location BIGELOW, AR
    Vehicle Identification Number 1FTSW21R69E****
13
    Summary of Complaint
    CRASHNo
14
    FIRENo
15
    INJURIES0
    DEATHS0
16
    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
17
    WITH AN EXTREME WOBBLE. THE DEALER WAS NOTIFIED OF THE FAILURE AND WAS
18
    UNABLE TO PROVIDE A REPAIR SOLUTION TO PREVENT THE FAILURE. THE CONTACT
    TOOK THE VEHICLE TO MORE THAN FIVE DIFFERENT REPAIR SHOPS FOR VARIOUS
19
    REPAIRS, BUT THE FAILURES CONTINUED IN THE FRONT AND REAR ENDS. THE
    VEHICLE WAS NOT REPAIRED AND THE CONTACT WAS WAITING TO DETERMINE IF
20
    THE MANUFACTURER WOULD BE ABLE TO PROVIDE A PERMANENT REPAIR
21
    SOLUTION. THE APPROXIMATE FAILURE MILEAGE WAS 180,000.
    1 Affected Product
22
23
    May 13, 2013 NHTSA ID NUMBER: 10512156
24
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10512156
25
    Incident Date November 1, 2012
26
    Consumer Location CHESAPEAKE, VA
    Vehicle Identification Number 1FTWW31R49E****
27
    Summary of Complaint
    CRASHNo
28
    FIRENo
                                        -172-
    Class Action Complaint
```

INJURIES0 DEATHS0

1

2 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 3 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 4 HOLD TO KEEP CONTROL OF THE TRUCK. THE VIBRATION CONTINUES UNTIL I SLOW 5 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 6 TRIES TO PUSH AWAY FROM THE TURN. I TOOK MY TRUCK TO THE DEALER ON FOUR 7 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 8 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 9 MY WHEELS. IT SEEMED TO WORK FOR A SHORT TIME UNTIL A PART FELL OFF THE 10 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 11 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 12 LEFT THE TRUCK SO HE WOULD UNDERSTAND WHAT IT WAS DOING. HE TOOK IT FOR A 13 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 14 CAMPER 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 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

1 Affected Product

19

28

18

15

16

17

March 10, 2016 NHTSA ID NUMBER: 10845889

A FORMAL COMPLAINT WITH FORD.

Components: SUSPENSION 20 NHTSA ID Number: 10845889 21 **Incident Date** February 2, 2015

Consumer Location SILVER CITY, NM 22

Vehicle Identification Number 1FTSW2BR0AE****

Summary of Complaint 23

CRASHNo FIRENo

24 **INJURIES0**

25 **DEATHSO**

TL* THE CONTACT OWNS A 2010 FORD F-250 SD. THE CONTACT STATED THAT WHILE 26 DRIVING AT ANY SPEED OVER 20 MPH, THE VEHICLE WOULD EXPERIENCE SEVERE 27

FRONT END VIBRATING AND SHAKING. THE VEHICLE WAS TAKEN TO THE DEALER BUT

THE CAUSE OF THE FAILURE WAS NOT DETERMINED. THE MANUFACTURER WAS **NOTIFIED OF THE FAILURE.** THE FAILURE MILEAGE WAS 30,000.

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Class Action Complaint

1 1 Affected Product 2 January 25, 2012 NHTSA ID NUMBER: 10445217 3 Components: SUSPENSION, STEERING 4 NHTSA ID Number: 10445217 **Incident Date** January 20, 2012 5 Consumer Location ROCHESTER HILLS, MI Vehicle Identification Number 1FT7W2B60BE**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHS0** I WAS DRIVING ON A ENTRANCE RAMP TO AN INTERSTATE AT ABOUT 55-60MPH... I 10 RECALL HITTING SOME TYPE OF ROAD BUMPS - PAVEMENT JOINT THAT STARTED THE EVENT... TYPICALLY I'M USED TO EXPERIENCING THE BACK OF MY TRUCK BOUNCE IN 11 THE PAST CAUSING LANE CORRECTION BUT THIS TIME THE WHOLE FRONT END 12 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 13 BEHIND... I PULLED OFF AND CHECKED THE LEFT SIDE AND THE RIGHT... ALL WAS FINE... I SHOOK THE WHEELS... ALL TIGHT... THE SHAKING OF THE VEHICLE WAS SO 14 SEVERE I HAD A HARD TIME CONTROLLING IT AND GETTING IT SAFELY OFF THE 15 ROADWAY... PAPERS IN MY VISORS SHOOK LOOSE... 2 GYM BAGS IN PASSENGER SEAT ENDED UP ON FLOOR.... A LARGE SCREEN TV THAT WAS TAPED AGAINST THE BACK 16 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 17 THE CONSOLE AND LATER FOUND ON THE FLOOR AT THE PASSENGERS DOOR!!!! BEING 18 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, 19 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 20 MY ISSUE, HE HAD NO IDEA BUT CHECKED AND FOUND TSB 11-6-14 THAT WAS 21 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 22 A POSSIBLE ROLL OVER ISSUE, AS IM SURE IF I WAS AT 70-80 ON THE FREEWAY OR MY KIDS DRIVING WITH LESS EXPERIENCE THERE WOULD HAVE BEEN A ROLLOVER... 23 FORD SAID UNTIL IT HAPPENS AGAIN OR THE DEALER CAN NOT FIX IT THERE WAS 24 NOTHING MORE THEY COULD DO!!!!! I ADVISED IT LOOKS LIKE THE NEXT CALL THEY WANT IS FROM LEGAL COUNCIL ADDING THE 0000 AFTER A FATALITY!!! *TR 25 1 Affected Product 26 27 December 5, 2012 NHTSA ID NUMBER: 10487446 **Components: SUSPENSION** 28 NHTSA ID Number: 10487446 -174-

Class Action Complaint

```
Incident Date February 1, 2012
 1
    Consumer Location MOUNTVILLE, PA
2
    Vehicle Identification Number 1FT7X2B64BE****
    Summary of Complaint
3
    CRASHNo
4
    FIRENo
    INJURIES0
5
    DEATHS0
    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
7
    BEGAN TO SHAKE VIOLENTLY. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER
    THREE TIMES FOR THE FAILURE. THE STEERING STABILIZER AND FRONT END SHOCKS
8
    WERE REPLACED AT DIFFERENT TIMES. THE FAILURE RECURRED AFTER THE REPAIRS
    WERE PERFORMED WHENEVER DRIVING OVER A ROAD BUMP OR POTHOLE. THE
9
    MANUFACTURER WAS NOTIFIED OF THE PROBLEM. THE APPROXIMATE FAILURE
10
    MILEAGE WAS 28,848.
    1 Affected Product
11
12
    March 27, 2014 NHTSA ID NUMBER: 10575179
13
    Components: STEERING, WHEELS, SUSPENSION
    NHTSA ID Number: 10575179
14
    Incident Date February 10, 2014
15
    Consumer Location NORTON, VA
    Vehicle Identification Number 1FT7X2B61BE****
16
    Summary of Complaint
    CRASHNo
17
    FIRENo
18
    INJURIES0
    DEATHSO
19
    TRUCK DEVELOPED A VIOLENT SHAKE IN THE FRONT END AND BECAME
    UNCONTROLLABLE. HAVE TO STOP IMMEDIATELY BEFORE VEHICLE WILL STOP
20
    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
    WORSE AND IS UNSAFE TO DRIVE. HAS BEEN IN THE FORD DEALER AND MANY NEW
22
    PARTS REPLACED BUT PROBLEM PERSIST. FORD DEALER CANNOT SEEM TO CORRECT
    SO IT HAS BEEN IN TWO OTHER GARAGES FOR SECOND OPINIONS. CONTACTED FORD
23
    MOTOR COMPANY AND THEY HAVE NO RECALLS OR ANY KNOWLEDGE OF THIS
24
    PROBLEM. VEHICLE IS A DANGER TO THE HIGHWAY. *TR
    1 Affected Product
25
26
    December 6, 2016 NHTSA ID NUMBER: 10930180
27
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10930180
28
    Incident Date October 15, 2016
                                        -175-
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Class Action Complaint Case No.

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Consumer Location WILLIS. TX
 1
    Vehicle Identification Number 1FT7W2BT0BE****
2
    Summary of Complaint
    CRASHNo
3
    FIRENo
4
    INJURIES0
    DEATHSO
5
    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
    REGAIN CONTROL. THE FAILURE RECURRED SEVERAL TIMES. THE VEHICLE WAS
7
    TAKEN TO AN INDEPENDENT MECHANIC WHO DIAGNOSED THAT THE SUSPENSION
    SYSTEM FAILED. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED
8
    OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 100,000.
    1 Affected Product
9
10
    June 27, 2017 NHTSA ID NUMBER: 11001691
11
    Components: SUSPENSION, STEERING
12
    NHTSA ID Number: 11001691
    Incident Date June 15, 2013
13
    Consumer Location VICTORIA, TX
    Vehicle Identification Number 1FT7W2BT4BE****
14
    Summary of Complaint
15
    CRASHNo
    FIRENo
16
    INJURIES0
    DEATHS0
17
    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
    UNKNOWN PARTS ON THE FRONT END OF THE VEHICLE, BUT THE FAILURE RECURRED
20
    SEVERAL MORE TIMES. THE MANUFACTURER STATED THAT THE CONTACT SHOULD
21
    TAKE THE VEHICLE TO A DEALER AND HAVE IT DIAGNOSED. THE CONTACT WAS
    REFERRED TO NHTSA. THE APPROXIMATE FAILURE MILEAGE WAS 25,000.
22
    1 Affected Product
23
24
    July 5, 2017 NHTSA ID NUMBER: 11003164
    Components: SUSPENSION, WHEELS
25
    NHTSA ID Number: 11003164
26
    Incident Date April 3, 2017
    Consumer Location BAKERSFIELD, CA
27
    Vehicle Identification Number 1FT7W2BT6BE****
    Summary of Complaint
28
    CRASHNo
                                         -176-
    Class Action Complaint
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FIRENo
 1
    INJURIES0
2
    DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH OVER A BUMP IN
3
    THE ROADWAY, THE VEHICLE SHOOK VIOLENTLY UNTIL SLOWING TO 30 MPH OR
4
    COMING TO A FULL STOP. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE
    VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THE LOCAL DEALER (JIM
5
    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
6
    REPLACE ALL FOUR TIRES. ALL FOUR TIRES WERE REPLACED, BUT THE ISSUE
7
    PERSISTED. THE MANUFACTURER WAS NOTIFIED AND REFERRED THE CONTACT TO
    NHTSA. THE FAILURE MILEAGE WAS 225,000.
8
    1 Affected Product
9
10
    November 8, 2018 NHTSA ID NUMBER: 11150119
    Components: SUSPENSION, STEERING
11
    NHTSA ID Number: 11150119
12
    Incident Date October 31, 2018
    Consumer Location DAYTON, OH
13
    Vehicle Identification Number 1FT7X2B66BE****
    Summary of Complaint
14
    CRASHNo
15
    FIRENo
    INJURIES0
16
    DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-250 SD. WHILE DRIVING OVER UNEVEN LAND
17
    AND BUMPS IN THE ROAD, THE VEHICLE SHOOK VIOLENTLY. ALSO, THE STEERING
18
    WHEEL VIBRATED AND THERE WAS A STRONG VIBRATION FELT IN THE FRONT OF THE
    VEHICLE WHILE DRIVING HIGHWAY SPEEDS. GERMAIN FORD OF BEAVERCREEK (2356
19
    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
20
    THE MANUFACTURER. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS
21
    NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 58,000.
    1 Affected Product
22
23
    September 20, 2013 NHTSA ID NUMBER: 10544696
24
    Components: STEERING
    NHTSA ID Number: 10544696
25
    Incident Date September 20, 2013
26
    Consumer Location GATE CITY. VA
    Vehicle Identification Number 1FT7X2BT3BE****
27
    Summary of Complaint
    CRASHNo
28
    FIRENo
                                         -177-
    Class Action Complaint
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INJURIES0 1 **DEATHS0** 2 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 3 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 4 TIMES IT SHAKES REALLY HARD AND TO GET IT TO OUIT I HAVE TO BRING MY SPEED 5 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 6 TO PRESENT AND NONE OF THEM HAVE EVER DONE THIS, EXCEPT THIS TRUCK. HAVE 7 YOU EVER HAD ANY MORE COMPLAINTS OF THIS NATURE? PLEASE CONTACT ME ON WHAT TO DO. THE DEALER HAS CONTACTED FORD MOTOR COM. THEY ARE THE 8 **ONES THAT SAYS IT SUPPOSE TO DO IT SOMETIMES.** IT DONE THAT 6 TIMES IN A 10 HOUR DRIVE 2 WEEKS AGO. *TR 9 **1 Affected Product** 10 11 November 18, 2013 NHTSA ID NUMBER: 10552684 12 **Components: STEERING** NHTSA ID Number: 10552684 13 **Incident Date** October 9, 2013 Consumer Location VALLEY STREAM, NY 14 Vehicle Identification Number 1FT7W2B60BE**** 15 **Summary of Complaint CRASHNo** 16 **FIRENo INJURIES0** 17 **DEATHS0** 18 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. 19 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 20 DIAGNOSE THE CAUSE OF THE FAILURE. THE VEHICLE WAS NOT REPAIRED. THE 21 MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 35,000. 22 1 Affected Product 23 24 September 16, 2011 NHTSA ID NUMBER: 10425765 **Components: SUSPENSION** 25 NHTSA ID Number: 10425765 26 **Incident Date** September 14, 2011 Consumer Location KENTFIELD, CA 27 Vehicle Identification Number 1FT7W3BT4BE**** **Summary of Complaint** 28 **CRASHNo** -178-Class Action Complaint

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FIRENo
 1
    INJURIES0
2
    DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-350. THE CONTACT WAS DRIVING
3
    APPROXIMATELY 65 MPH OVER A ROAD BUMP WHEN THE VEHICLE BEGAN TO
4
    VIBRATE VIOLENTLY, CAUSING THE VEHICLE TO TRAVEL INTO ANOTHER LANE
    WITHOUT INTENT. THE FAILURE RECURRED THREE TIMES WHILE DRIVING OVER A
5
    ROAD BUMP OR POTHOLE. THE CONTACT PLANNED TO TAKE THE VEHICLE TO AN
    AUTHORIZED DEALER FOR DIAGNOSIS. THE MANUFACTURER WAS MADE AWARE OF
6
    THE PROBLEM. THE APPROXIMATE FAILURE MILEAGE WAS 23,400.
7
    1 Affected Product
8
    November 2, 2011 NHTSA ID NUMBER: 10433960
9
    Components: SUSPENSION
    NHTSA ID Number: 10433960
10
    Incident Date September 14, 2011
    Consumer Location MCLEANSVILLE, NC
11
    Vehicle Identification Number 1FT8W3DT4BE****
12
    Summary of Complaint
    CRASHNo
13
    FIRENo
    INJURIES0
14
    DEATHS0
15
    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
16
    VEHICLE WAS NOT TAKEN TO THE DEALER. THE MANUFACTURER WAS MADE
    AWARE OF THE FAILURE WHO REFERRED HIM TO THE DEALER. THE VEHICLE WAS
17
    NOT REPAIRED. THE FAILURE AND CURRENT MILEAGE WAS 23,500.
18
    1 Affected Product
19
20
    August 17, 2012 NHTSA ID NUMBER: 10471247
    Components: STEERING
21
    NHTSA ID Number: 10471247
    Incident Date July 17, 2011
22
    Consumer Location THOUSAND OAKS, CA
23
    Vehicle Identification Number 1FDRF3GT6BE****
    Summary of Complaint
24
    CRASHNo
    FIRENo
25
    INJURIES0
26
    DEATHSO
    TL* THE CONTACT OWNS A 2011 FORD F350 SD. THE CONTACT STATED THAT HE
27
    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. THE MANUFACTURER WAS NOTIFIED AND A
                                        -179-
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Class Action Complaint

1 CLAIM WAS FILED (CLAIM NUMBER 1512842141) BUT IT WAS DENIED BY THE MANUFACTURER WHO OFFERED NO ASSISTANCE. THE FAILURE MILEAGE WAS 2,000 2 AND THE CURRENT MILEAGE WAS 20,000. **1 Affected Product** 3 4 February 28, 2013 NHTSA ID NUMBER: 10500801 5 **Components: STEERING** NHTSA ID Number: 10500801 6 **Incident Date** January 2, 2013 7 Consumer Location POCOMOKE CITY, MD Vehicle Identification Number 1FT8W3BTXBE**** 8 **Summary of Complaint CRASHNo** 9 **FIRENo** 10 **INJURIES0 DEATHS0** 11 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 THE FAILURE RECURRED. THE VEHICLE WAS THEN TAKEN TO AN INDEPENDENT 14 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 TIRES WERE THEN OVER INFLATED AND THE FAILURE RECURRED. THE 17 MANUFACTURER WAS NOTIFIED AND STATED THAT THE WOBBLE WAS NORMAL 18 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 **Components: STEERING** 22 NHTSA ID Number: 10504688 23 **Incident Date** January 23, 2013 Consumer Location MOORESVILLE, NC 24 Vehicle Identification Number 1FT8W3BT4BE**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** TL* THE CONTACT OWNS A 2011 FORD F-350. THE CONTACT STATED THAT WHILE 28 DRIVING APPROXIMATELY 65 MPH, THE VEHICLE WOULD SHAKE VIOLENTLY AND -180-

Class Action Complaint

1 WITHOUT WARNING. THE VEHICLE WAS TAKEN TO THE DEALER WHERE IT WAS DIAGNOSED THAT THE STEERING STABILIZER NEEDED TO BE REPLACED. THE 2 CONTACT MENTIONED THE VEHICLE WAS TAKEN TO THE DEALER TWICE FOR THE SAME FAILURE. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE 3 VEHICLE WAS NOT REPAIRED. THE APPROXIMATE FAILURE MILEAGE WAS 12,000 AND 4 THE CURRENT MILEAGE WAS 30,000. *TR **1 Affected Product** 5 September 24, 2015 NHTSA ID NUMBER: 10776467 6 **Components: SUSPENSION** 7 NHTSA ID Number: 10776467 Incident Date April 15, 2014 8 Consumer Location PALM BAY, FL Vehicle Identification Number 1FT7W2BT6CE**** 9 **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** TL* THE CONTACT OWNS A 2012 FORD F-250. WHILE DRIVING APPROXIMATELY 60 MPH, 13 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 14 DIAGNOSTIC TESTING. THE MECHANIC STATED THAT THE STEERING BOX, STABILIZER, 15 AND DRAG LINK NEEDED TO BE REPLACED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 45,000. 16 **1 Affected Product** 17 18 November 18, 2015 NHTSA ID NUMBER: 10794621 Components: SUSPENSION, STEERING 19 NHTSA ID Number: 10794621 20 Incident Date October 25, 2015 Consumer Location MERIDIAN, ID 21 Vehicle Identification Number 1FT7W2BT1CE**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** DRIVING AT HIGHWAY SPEEDS OF 55 - 65MPH AND HIT A SLIGHT BUMP IN THE ROAD 25 THE ENTIRE FRONT END OF THE VEHICLE SHAKES UNCONTROLLABLY. IN ORDER TO 26 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 27 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 28 TOTAL TIME. FORD REGION CUSTOMER SERVICE MANAGER STATES THE ISSUE IS -181-

Class Action Complaint

THE ROAD. I FIND IT ODD THERE ARE MAY OTHER FORD TRUCK OWNERS WITH THE 1 SAME ISSUE. 2 **1 Affected Product** 3 4 July 11, 2018 NHTSA ID NUMBER: 11110864 **Components: SUSPENSION** 5 NHTSA ID Number: 11110864 **Incident Date** July 9, 2018 6 Consumer Location COLUMBIA CITY, IN 7 Vehicle Identification Number 1FT7W2BT3CE**** **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHSO** THE VEHICLE WILL RANDOMLY SHAKE VIOLENTLY CAUSING LOSS OF CONTROL OF 11 THE TRUCK WHILE DRIVING. AFTER DOING RESEARCH I FOUND PEOPLE WHO HAVE 12 REFERRED TO THIS AS THE "DEATH WOBBLE." I HAVE HAD REPAIRS TO MY TRUCK 3 TIMES IN THE LAST 2 YEARS TO FIX THIS CAUSING ME APPROXIMATELY \$1000 EACH 13 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 14 DEALERSHIP IS UNWILLING TO HELP NOR IS FORD CUSTOMER COMPLAINT 15 **DEPARTMENT**. THIS HAPPENS WHILE DRIVING 55-65 MPH AND AFTER HITTING A BUMP. 1 Affected Product 16 17 July 30, 2013 NHTSA ID NUMBER: 10532703 18 **Components: SUSPENSION** NHTSA ID Number: 10532703 19 **Incident Date** April 4, 2013 Consumer Location JONESTOWN, PA 20 Vehicle Identification Number 1FT7W2BT7CE**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo** 23 **INJURIES0 DEATHSO** 24 TL* THE CONTACT OWNS A 2012 FORD F-250SD. THE CONTACT STATED THAT WHILE DRIVING VARIOUS SPEEDS OVER A ROAD BUMP OR POTHOLE, THE VEHICLE WOULD 25 TRAVEL OUT OF LANE WITHOUT WARNING. THE VEHICLE WAS INSPECTED BY TWO 26 DIFFERENT DEALERS WHO WERE UNABLE TO LOCATE A PROBLEM WITH THE SHOCKS. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC FOR A THIRD OPINION AND 27 THEY REPLACED FOUR SHOCKS. THE AUTHORIZED DEALER REIMBURSED THE OWNER FOR THE DEFECTIVE SHOCKS. THE MANUFACTURER WAS NOTIFIED OF THE DEFECT. 28 THE APPROXIMATE FAILURE MILEAGE WAS 3,000. -182-Class Action Complaint

1 Affected Product 1 2 November 21, 2018 NHTSA ID NUMBER: 11153140 3 Components: SUSPENSION, STEERING, WHEELS 4 NHTSA ID Number: 11153140 **Incident Date** November 19, 2018 5 **Consumer Location** Unknown Vehicle Identification Number 1FT7W2BT9CE**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 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 INDICATORS ILLUMINATED. THE CONTACT MENTIONED THAT THE ONLY WAY TO STOP 11 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. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE VEHICLE WAS REPAIRED. THE APPROXIMATE 14 FAILURE MILEAGE WAS 80,000. 15 1 Affected Product 16 July 29, 2016 NHTSA ID NUMBER: 10891584 17 Components: ELECTRONIC STABILITY CONTROL, STEERING 18 NHTSA ID Number: 10891584 **Incident Date** September 1, 2014 19 **Consumer Location** Unknown 20 Vehicle Identification Number 1FT8W3BT4CE**** **Summary of Complaint** 21 **CRASHNo FIRENo** 22 **INJURIES0** 23 **DEATHS0** TL* THE CONTACT OWNS A 2012 FORD F-350. WHILE DRIVING APPROXIMATELY 75 MPH, 24 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 25 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. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE RECURRED. 28 THE APPROXIMATE FAILURE MILEAGE WAS 141,000. -183-Class Action Complaint

1 1 Affected Product 2 April 18, 2018 NHTSA ID NUMBER: 11088792 3 Components: SUSPENSION, WHEELS 4 **NHTSA ID Number:** 11088792 **Incident Date** April 18, 2018 5 Consumer Location GREENVIEW, IL Vehicle Identification Number 1FT7W2BT7DE**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 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 DIFFICULT TO CONTROL. THERE WERE NO WARNING INDICATORS ILLUMINATED 11 BEFORE OR AFTER THE FAILURE. THE VEHICLE WAS TAKEN TO LANDMARK FORD (2401 12 PRAIRIE CROSSING DR., SPRINGFIELD, IL 62711) FOR DIAGNOSTIC TESTING AND REPAIRS. THE CONTACT WAS UNABLE TO RECALL WHAT WAS DIAGNOSED AND 13 REPAIRED. THE CONTACT STATED THAT THE VEHICLE WAS REPAIRED, BUT THE FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE 14 APPROXIMATE FAILURE MILEAGE WAS 60,000. 15 **1 Affected Product** 16 17 July 24, 2017 NHTSA ID NUMBER: 11010308 **Components: SUSPENSION** 18 NHTSA ID Number: 11010308 **Incident Date** February 15, 2015 19 Consumer Location COLORADO SPRINGS, CO Vehicle Identification Number 1FT8W3BT0DE**** 20 **Summary of Complaint** 21 **CRASHNo FIRENo** 22 **INJURIES0** 23 **DEATHS0** TL* THE CONTACT OWNS A 2013 FORD F-350. ON SEVERAL OCCASIONS, WHILE DRIVING 24 55 MPH, THE VEHICLE VIOLENTLY SHOOK WHEN MAKING CONTACT WITH A BUMP. THE CONTACT STATED THAT THE STEERING WHEEL BECAME DIFFICULT TO MANEUVER 25 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 BUSHINGS, SPRING MOUTH, STEERING STABILIZER SHOCK, AND ALL FOUR TIRES 28 NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE -184-Class Action Complaint

RECURRED. THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO 1 TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS 2 **OFFERED.** THE FAILURE MILEAGE WAS 53,000. **1 Affected Product** 3 4 February 3, 2016 NHTSA ID NUMBER: 10823993 5 Components: ENGINE, STEERING NHTSA ID Number: 10823993 6 **Incident Date** July 1, 2015 7 Consumer Location FARMINGTON, NM Vehicle Identification Number N/A 8 **Summary of Complaint CRASHNo** 9 **FIRENo** 10 **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 THE VEHICLE TO THE DEALER FIVE TIMES. THE DEALER STATED THAT THIS WAS A 14 COMMON FAILURE WITH THE VEHICLE AND THERE WAS NO REMEDY. THE VEHICLE 15 WAS NOT REPAIRED. THE FAILURE RECURRED. THE MANUFACTURER STATED THAT THE FAILURE DID NOT QUALIFY UNDER THE LEMON LAW. THE VIN WAS UNKNOWN. 16 THE APPROXIMATE FAILURE MILEAGE WAS 19,000. **1 Affected Product** 17 18 October 20, 2014 NHTSA ID NUMBER: 10648730 19 Components: ELECTRONIC STABILITY CONTROL, UNKNOWN OR OTHER, **SUSPENSION** 20 **NHTSA ID Number:** 10648730 21 Incident Date October 15, 2014 Consumer Location SANBORNTON, NH 22 Vehicle Identification Number 1FT7X3B66FE**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 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 27 WASHBOARD TYPE BUMP. IMMEDIATELY, THE FRONT OF THE VEHICLE VIBRATED EXCESSIVELY. I RELEASED THE GAS PEDAL AND PUSHED SLIGHTLY ON THE BRAKES. 28 THE REAR OF THE VEHICLE STARTED TO VIBRATE AND THE REAR AXLE LOST -185-

Class Action Complaint

```
1
    TRACTION ALLOWING THE REAR OF THE VEHICLE TO SWING VIOLENTLY TO THE
    RIGHT. I IMMEDIATELY WENT TO THE FORD DEALERSHIP WHERE I PURCHASED THE
 2
    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
 3
    IMMEDIATELY TOLD ME TO "PUT WEIGHT IN THE BACK OF THE TRUCK. THAT'S
 4
    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
 5
    ABOUT." THE DEALERSHIP TOOK THE TRUCK IN FOR INSPECTION. NOTHING WAS
    FOUND MECHANICALLY. DURING THE INSPECTION, THE REAR TIRE PRESSURE WAS
 6
    LOWERED TO 65 PSI INSTEAD OF THE RECOMENDED 80 PSI THAT WAS SET PRIOR FROM
 7
    THE MANUFACTURER. THE TIRE PRESSURE MONITOR SYSTEM WAS RE-CALIBRATED TO
    SHOW THE LOWERED TIRE PRESSURE. FRONT PRESSURES WERE LEFT AT THE
 8
    RECOMMENDED 65 PSI. I AM NOW CONCERNED WITH EXCESSIVE TIRE WEAR RUNNING
    THE TIRES UNDER-INFLATED. THE DEALERSHIP CALLED FORD AND WAS ADVISED
 9
   IT IS A "NORMAL CONDITION" TO ALMOST ROLL OVER A PICKUP WITH SUCH A
10
    STIFF SUSPENSION WITHOUT A LOAD IN THE BACK CONSTANTLY. FORD IS
    UNAWARE OF ISSUE. LOWERED TIRE PRESSURES SLIGHTLY IMPROVED THE SAFETY
11
    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
12
    WASHBOARD, THIS TIME GOING STRAIGHT AND 25 MILES PER HOUR. THE SAME
13
    VIBRATE/SHAKING OCCURRED AND THE BACK END AGAIN SWUNG TO THE RIGHT
    WITHOUT ANY BRAKING WHATSOEVER. I WAS CLOSE TO LOSING CONTROL. *TR
14
    1 Affected Product
15
16
    August 11, 2017 NHTSA ID NUMBER: 11014734
    Components: SUSPENSION
17
    NHTSA ID Number: 11014734
18
    Incident Date July 25, 2016
    Consumer Location SAHUARITA, AZ
19
    Vehicle Identification Number 1FT7W2BT1GE****
    Summary of Complaint
20
    CRASHNo
21
    FIRENo
    INJURIES0
22
    DEATHSO
    VEHICLE EXPERIENCES SEVERE BOUNCE BETWEEN 70-75 MPH. FORD HAS CONFIRMED
23
    ISSUE AND HAS STATED IT IS A "CHARACTERISTIC OF THE VEHICLE". ISSUE WAS
24
    REPORTED TO DEALER AND FORD AT TIME OF PURCHASE. BOUNCE IS VERY
    PRONOUNCED AND VEHICLE IS NOT SAFE DURING OPERATION.
25
    1 Affected Product
26
27
    December 12, 2017 NHTSA ID NUMBER: 11054256
    Components: STEERING
28
    NHTSA ID Number: 11054256
                                       -186-
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Class Action Complaint

```
1
    Incident Date October 12, 2017
    Consumer Location MASON, TX
2
    Vehicle Identification Number 1FDRF3FT1GE****
    Summary of Complaint
3
    CRASHNo
4
    FIRENo
    INJURIES0
5
    DEATHS0
    TL* THE CONTACT OWNS A 2016 FORD F-350. WHILE DRIVING VARIOUS SPEEDS, THE
6
    VEHICLE BEGAN TO SHAKE VIOLENTLY WITHOUT WARNING. THE FAILURE RECURRED
7
    RANDOMLY. THE VEHICLE WAS TAKEN TO THE LOCAL DEALER (MCLEAN FORD OF
    FREDERICKSBURG, 1279 US-87, FREDRICKBURG, TX 78624), BUT THE CAUSE OF THE
8
    FAILURE COULD NOT BE DETERMINED. THE VEHICLE WAS ALSO TAKEN TO AN
    INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE STEERING DAMPER
9
    FAILED AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE
10
    MANUFACTURER WAS NOTIFIED OF THE FAILURE AND DID NOT ASSIST. THE
    FAILURE MILEAGE WAS APPROXIMATELY 14,000.
11
    1 Affected Product
12
13
    March 15, 2018 NHTSA ID NUMBER: 11079671
    Components: SUSPENSION
14
    NHTSA ID Number: 11079671
15
    Incident Date March 7, 2018
    Consumer Location TULSA, OK
16
    Vehicle Identification Number 1FT7W2BT1HE****
    Summary of Complaint
17
    CRASHNo
18
    FIRENo
    INJURIES0
19
    DEATHS0
20
    ON HIGHWAY - THE FRONT-END AND STEERING WHEEL BEGAN TO WOBBLE BACK AND
    FORTH, UNCONTROLLABLY AND VIOLENTLY REQUIRED BREAKING TO AROUND 20
21
    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
22
    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
23
    THEM TO BUY BACK THE VEHICLE. THEY WOULD NOT. I SOLD THE VEHICLE BACK
24
    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
25
    WILL BE FILED. NO PICTURES... JUST GOOGLE "FORD DEATH WOBBLE"
    1 Affected Product
26
27
    March 19, 2018 NHTSA ID NUMBER: 11080144
28
    Components: STEERING, SUSPENSION
```

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Class Action Complaint Case No.

```
1
    NHTSA ID Number: 11080144
    Incident Date March 6, 2018
2
    Consumer Location WASHINGTON, IA
    Vehicle Identification Number 1FT7W2BT7HE****
3
    Summary of Complaint
4
    CRASHNo
    FIRENo
5
    INJURIES0
    DEATHS0
    TL* THE CONTACT OWNS A 2017 FORD F-250 SD. WHILE DRIVING 70 MPH, THE FRONT
7
    END OF THE VEHICLE EXPERIENCED A "DEATH WOBBLE". THE FAILURE IMPACTED THE
    STEERING AND CAUSED THE STEERING WHEEL TO VIBRATE VIOLENTLY. THERE WERE
8
    NO WARNING INDICATORS ILLUMINATED. MCGRATH FORD (4001 1ST AVE SE, CEDAR
    RAPIDS, IA 52402) DIAGNOSED THAT THE CONTROL ARM FAILED. THE VEHICLE WAS
9
    REPAIRED, BUT THE FAILURE RECURRED AFTER THE REPAIR. THE MANUFACTURER
10
    WAS NOTIFIED AND FILED CASE NUMBER: 14400173. THE FAILURE MILEAGE WAS
    19,500. THE VIN WAS NOT AVAILABLE. *TT
11
    1 Affected Product
    1 Associated Document
12
13
    October 26, 2018 NHTSA ID NUMBER: 11142955
14
    Components: STEERING, SUSPENSION
15
    NHTSA ID Number: 11142955
    Incident Date August 31, 2018
16
    Consumer Location LOS GATOS, CA
    Vehicle Identification Number N/A
17
    Summary of Complaint
18
    CRASHNo
    FIRENo
19
    INJURIES0
20
    DEATHSO
    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
    THE VEHICLE WAS DRIVEN OVER 70 MPH. IT WAS EXTREMELY DIFFICULT FOR THE
22
    CONTACT TO OPERATE THE VEHICLE. THE DEALER (GALPIN FORD, 15505 ROSCOE BLVD,
    NORTH HILLS, CA 91343, 1-(818) 787-3800) KEPT THE VEHICLE FOR MONTHS, BUT COULD
23
    NOT DIAGNOSE OR REPAIR THE VEHICLE. THE DEALER DID NOT PROVIDE A LOANER
24
    VEHICLE OPTION DURING THAT TIME. THE MANUFACTURER WAS NOTIFIED OF THE
    FAILURE AND THE CONTACT WAS WAITING ON THEIR RESPONSE. THE VIN AND
25
    FAILURE MILEAGE WERE NOT AVAILABLE.
    1 Affected Product
26
27
    December 7, 2018 NHTSA ID NUMBER: 11156845
28
    Components: ELECTRONIC STABILITY CONTROL, SUSPENSION
```

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Class Action Complaint

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NHTSA ID Number: 11156845
 1
    Incident Date October 1, 2018
 2
    Consumer Location SEMINOLE, FL
    Vehicle Identification Number 1FT7W2BT0HE****
 3
    Summary of Complaint
 4
    CRASHNo
    FIRENo
 5
    INJURIES0
    DEATHS0
 6
    TL* THE CONTACT OWNS A 2017 FORD F-250. WHILE DRIVING VARIOUS SPEEDS ON A
 7
    CLEAR ROAD SURFACE, THE VEHICLE SHOOK VIOLENTLY OUT OF CONTROL. AS A
    RESULT, THE STEERING COLUMN SHOOK VIOLENTLY. THE CONTACT STATED THAT
 8
    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
 9
    ON A DAILY BASIS AND THE SHAKING FAILURE WORSENED. THE VEHICLE WAS NOT
10
    TAKEN TO A DEALER. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE
    MANUFACTURER WAS CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS
11
    8,000.
    1 Affected Product
12
13
    February 28, 2018 NHTSA ID NUMBER: 11075516
14
    Components: STEERING
15
    NHTSA ID Number: 11075516
    Incident Date June 30, 2017
16
    Consumer Location ALMA, IL
    Vehicle Identification Number 1FT7W2BT2HE****
17
    Summary of Complaint
18
    CRASHNo
    FIRENo
19
    INJURIES0
20
    DEATHSO
    TL* THE CONTACT OWNS A 2017 FORD F-250 SD. THE CONTACT STATED THAT THERE
21
    WAS A DEATH WOBBLE ON THE FRONT END OF THE VEHICLE. THE FAILURE IMPACTED
    THE STEERING AND CAUSED A STRONG VIBRATION IN THE STEERING WHEEL. THE
22
    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. THE
25
    MANUFACTURER WAS TO RESPOND TO THE CONTACT TO ADDRESS THE REPAIR
    SOLUTION. THE APPROXIMATE FAILURE MILEAGE WAS 16,000.
26
    1 Affected Product
27
28
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November 13, 2018 NHTSA ID NUMBER: 11151224

Class Action Complaint

```
1
    Components: STEERING
    NHTSA ID Number: 11151224
2
    Incident Date October 27, 2018
    Consumer Location GRIMESLAND, NC
3
    Vehicle Identification Number 1FT7W2B65HE****
4
    Summary of Complaint
    CRASHNo
5
    FIRENo
    INJURIES0
6
    DEATHS0
7
    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
8
    LEFT. THE CONTACT ALMOST LOST CONTROL OF THE VEHICLE. THERE WAS NO
    WARNING INDICATOR ILLUMINATED. THE FAILURE RECURRED. THE VEHICLE WAS
9
    TAKEN TO DEACON JONES FORD-LINCOLN, INC. (919-736-3387, LOCATED AT 3301
10
    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
11
    TECHNICIAN TO REMEDY THE FAILURE. THE TECHNICIAN STATED THAT THE VEHICLE
    WAS NOT MANUFACTURED BY THE DEALER. THE MANUFACTURER WAS MADE
12
    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
14
15
    November 13, 2018 NHTSA ID NUMBER: 11151155
    Components: STEERING, SUSPENSION
16
    NHTSA ID Number: 11151155
    Incident Date November 12, 2018
17
    Consumer Location SIOUX FALLS, SD
18
    Vehicle Identification Number 1FT8W3BT0HE****
    Summary of Complaint
19
    CRASHNo
    FIRENo
20
    INJURIES0
21
    DEATHS0
    TL* THE CONTACT OWNS A 2017 FORD F-350 SD. THE CONTACT STATED THAT THE
22
    VEHICLE HAD AN EXTENSIVE "DEATH WOBBLE", WHICH CAUSED IT TO BE UNSTABLE
    WHEN DRIVING OVER 70 MPH. THE CONTACT HAD TO APPLY EXTREME FORCE TO THE
23
    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
    WORN AND NEEDED TO BE REPLACED. THE MANUFACTURER WAS NOTIFIED OF THE
25
    FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 28,000.
    1 Affected Product
26
27
    December 5, 2018 NHTSA ID NUMBER: 11156425
28
    Components: STEERING, SUSPENSION
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Class Action Complaint

October 2, 2018 NHTSA ID NUMBER: 11132889 Components: STEERING

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Class Action Complaint

NHTSA ID Number: 11132889 Incident Date September 17, 2018 Consumer Location KANSAS CITY, MO Vehicle Identification Number 1FT8W3BT7JE**** Summary of Complaint CRASHNO FIRENO TL* THE CONTACT OWNS A 2018 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 60 MPH AND PULLING A 40 FOOT FIFTH WHEEL, THE VEHICLE DROVE OVER AN EXPANSION JOINT ON THE ROAD. THE FRONT END OF THE VEHICLE BEGAN 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 VEHICLE, THE CONTACT SUSTAINED A TORN LEFT SHOULDER MUSCLE BECAUSE THE STEERING WHEEL SHOOK SO VIOLENTLY. MEDICAL ATTENTION WAS ONGOING AND SURGERY WAS REQUIRED. THE VEHICLE WAS TAKEN TO THE DEALER (BROADWAY FORD INC, 980 W BROADWAY STREET, IDAHO FALLS, ID 83402) WHERE IT WAS DIAGNOSED THAT THERE WAS STEERING OSCILLATION (PART OF TSB NUMBER: 18- 2268). THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND PROVIDED CASE NUMBER: CAS-15812304. THE APPROXIMATE FAILURE MILEAGE WAS 8,200. *TT *JB 1 Affected Product 1 Associated Document 43. In addition, another 337 consumer complaints registered with NHTSA expressly refer to the complainant having notified an authorized Ford dealer of the Death Wobble Defect. C. Ford's Active Concealment of the Suspension Defect 45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA fro		
Consumer Location KANSAS CITY, MO Vehicle Identification Number 1FT8W3BT7JE**** Summary of Complaint CRASHNo FIRENO INJURIES1 DEATHS0 TL* THE CONTACT OWNS A 2018 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 60 MPH AND PULLING A 40 FOOT FIFTH WHEEL. THE VEHICLE DROVE OVER AN EXPANSION JOINT ON THE ROAD. THE FRONT END OF THE VEHICLE BEGAN 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 VEHICLE, THE CONTACT SUSTAINED A TORN LEFT SHOULDER MUSCLE BECAUSE THE STEERING WHEEL SHOOK SO VIOLENTLY. MEDICAL ATTENTION WAS ONGOING AND SURGERY WAS REQUIRED. THE VEHICLE WAS TAKEN TO THE DEALER (BROADWAY PORD INC, 980 W BROADWAY STREET, IDAHO FALLS, ID 83402) WHERE IT WAS DIAGNOSED THAT THERE WAS STEERING OSCILLATION (PART OF TSB NUMBER: 18- 2268). THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND PROVIDED CASE NUMBER: CAS-15812304. THE APPROXIMATE FAILURE MILEAGE WAS 8,200. *TT *JB 1 Affected Product 1 Associated Document 43. In addition, another 337 consumer complaints registered with NHTSA expressly refer to 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 Bullctins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect. 55. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA fro	1	NHTSA ID Number: 11132889
Vehicle Identification Number IFT8W3BT7JE**** Summary of Complaint (CRASHNO FIRENO INJURIES1 DEATHS0 TL** THE CONTACT OWNS A 2018 FORD F-350 SD. WHILE DRIVING APPROXIMATELY 60 MPH AND PULLING A 40 FOOT FIFTH WHEEL, THE VEHICLE DROVE OVER AN EXPANSION JOINT ON THE ROAD. THE FRONT END OF THE VEHICLE BEGAN OSCILATING SEVERLY, 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 VEHICLE, THE CONTACT SUSTAINED A TORN LEFT SHOULDER MUSCLE BECAUSE THE STEERING WHEEL SHOOK SO VIOLENTLY. MEDICAL ATTENTION WAS ONGOING AND SURGERY WAS REQUIRED. THE VEHICLE WAS TAKEN TO THE DEALER (BROADWAY FORD INC, 980 W BROADWAY STREET, IDAHO FALLS, ID 83402) WHERE IT WAS DIAGNOSED THAT THERE WAS STEERING OSCILLATION (PART OF TSB NUMBER: 18- 2268). THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND PROVIDED CASE NUMBER: CAS-15812304, THE APPROXIMATE FAILURE MILEAGE WAS 8,200. *TT *JB 1 Affected Product 1 Associated Document 43. In addition, another 337 consumer complaints registered with NHTSA expressly refer to 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 Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect. 45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA fro		Incident Date September 17, 2018
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43. In addition, another 337 consumer complaints registered with NHTSA expressly refer to 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 Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect. C. Ford's Active Concealment of the Suspension Defect 45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	16	1 Associated Document
18	10	
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 Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect. C. Ford's Active Concealment of the Suspension Defect 45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	17	42 I 11'4' 41 227 1 1 4 1 4 NITTOA 1 C 4
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 Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect. C. Ford's Active Concealment of the Suspension Defect 45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	18	43. In addition, another 337 consumer complaints registered with NH1SA expressly refer to
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 existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 24 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from the service of the defect to Plaintiff, Class Members, and consumers.		the complainant having notified an authorized Ford dealer of the Death Wobble defect.
Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect. C. Ford's Active Concealment of the Suspension Defect 45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	19	44 Finally, as discussed in the following section. Defendant's own Technical Service
Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect. C. Ford's Active Concealment of the Suspension Defect 45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	20	77. I many, as discussed in the following section, Defendant's own Technical Service
22 4 5. Ford through its service records and customer service division has acknowledged the 23 existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to 24 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	21	Bulletins and notices to its consumers also establish Ford's knowledge of the Death Wobble Defect.
45. Ford through its service records and customer service division has acknowledged the existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	21	C. Ford's Active Concealment of the Suspension Defect
existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	22	
existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	23	45. Ford through its service records and customer service division has acknowledged the
the true nature and existence of the defect to Plaintiff, Class Members, and consumers. 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from		existence of the Death Wobble. Despite these acknowledgments, the company has failed to disclose to
25 46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	24	the two neture and evictories of the defect to Plaintiff Class Members and consumers
46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from	25	the true nature and existence of the defect to Framith, Class Members, and consumers.
26 2005 through 2019, 337 of the complaints expressly reference the complainant having notified an		46. By way of example, of the 1,265 Death Wobble complaints registered with NHTSA from
	26	2005 through 2019, 337 of the complaints expressly reference the complainant having notified an

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authorized Ford dealer of having experienced the death wobble. Of those 337 complaints, 88 of the

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MECHANIC AND HAVE NEVER SEEN ANYTHING LIKE THIS. THE DEALER HAS TOLD US

THREATENING ISSUE, WE HAVE NOT DRIVEN THE VEHICLE ON THE HIGHWAY SINCE

THAT THERE IS NO PROBLEM, YET I VIEW THIS AS A POTENTIALLY LIFE

Class Action Complaint Case No.

1 Affected Product

THE LAST EPISODE. *TR

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1 2 February 27, 2008 NHTSA ID NUMBER: 10219302 **Components: SUSPENSION** 3 NHTSA ID Number: 10219302 4 **Incident Date** November 1, 2007 Consumer Location MOSCOW, ID 5 Vehicle Identification Number 1FTSX21535E**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** 9 VEHICLE STARTS TO SHAKE UNCONTROLLABLY AFTER HITTING A SMALL BUMP (POTHOLE, BRIDGE CONNECTOR) AT HIGHWAY SPEEDS (50-70 MPH). VEHICLE IS 10 DIFFICULT TO CONTROL, AND STEERING IS SOMETIMES UNRESPONSIVE UNTIL VEHICLE SLOWS DOWN BELOW 40 MPH. THIS PROBLEM HAS CAUSED THE VEHICLE TO 11 VEER TO THE LEFT ACROSS THE CENTER LINE, BUT THIS DOES NOT ALWAYS OCCUR. 12 LOCAL DEALERS HAVE INSPECTED THE VEHICLE AND FOUND NO PROBLEMS WITH SUSPENSION OR CONTROL COMPONENTS. INCIDENT DATE IS JUST ONE OF AT LEAST 13 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 1 Affected Product 16 17 January 5, 2009 NHTSA ID NUMBER: 10253778 18 **Components: SUSPENSION** NHTSA ID Number: 10253778 19 **Incident Date** January 15, 2006 Consumer Location ORLANDO, FL 20 Vehicle Identification Number N/A 21 **Summary of Complaint CRASHNo** 22 **FIRENo** 23 **INJURIES0 DEATHS0** 24 VIOLENT SHUDDER AND STEERING OSCILLATION. THIS FIRST HAPPENED AFTER DRIVING OVER A SLIGHT DROPOFF AT ABOUT 60MPH AND THE WHOLE TRUCK 25 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 AND HAPPENS AT LOW SPEEDS ALSO (40MPH) THE STEERING WHEEL HAS BEEN 27 SHAKEN OFF CENTER DUE TO THIS. MY WIFE WILL NOT DRIVE THE VEHICLE AS ITS QUITE SCARY WHEN THIS HAPPENS AT RELATIVELY HIGH SPEEDS AND IS VERY 28 SUDDEN AND UNEXPECTED, I ALSO WILL NOT ALLOW MY CHILDREN TO RIDE IN THE -194-Class Action Complaint

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 ADMIT IT SOUNDS CRAZY FOR A \$40,000 TRUCK TO BEHAVE THIS WAY). THEY SAID 5 THERE WAS NOTHING WRONG AND SAID I NEEDED MY FIRST SET OF NEW TIRES AND AN ALIGNMENT (AT 12,000 MILES). A FEW MONTHS LATER I CAME BACK INTO THE 6 SAME FORD DEALER WITH THE SAME ISSUE AND WAS TOLD THERE WAS NOT 7 MUCH THAT COULD BE DONE AS BASED ON MY PREVIOUS VISIT MY TRUCK APPEARED FINE. I WAS VERY DISSATISFIED WITH THIS LEVEL OF CUSTOMER SERVICE 8 AND WALKED OUT. I AM NOW STUCK WITH A TRUCK THAT SHUDDERS VIOLENTLY SEVERAL TIMES A DAY, I AM UNABLE TO SELL THE VEHICLE AS NOBODY WOULD EVER 9 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 DEFECT AND HAVE CHOSEN TO DO NOTHING ABOUT IT FOR THEIR CUSTOMERS. THIS IS 11 MY 5TH AND LAST FORD TRUCK.. I UNDERSTAND THAT NOTHING IS PERFECT AND THINGS CAN GO WRONG BUT MY COMPLAINTS ALONG WITH OTHERS 12 HAVE BEEN IGNORED AND I FEEL MY TRUCK IS POSES A REAL DANGER TO ANYONE 13 WHO RIDES IN IT. *TR 1 Affected Product 14 15 April 4, 2009 NHTSA ID NUMBER: 10264111 16 Components: STEERING, SUSPENSION NHTSA ID Number: 10264111 17 **Incident Date** April 1, 2009 18 Consumer Location PUYALLUP, WA Vehicle Identification Number 1FTSW21P05E**** 19 **Summary of Complaint CRASHNo** 20 **FIRENo** 21

INJURIES0

DEATHSO 22

24

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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 23

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 INTO VIOLENT DEATH WOBBLE ALMOST CAUSED AN ACCIDENT. BY HITTING

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 26

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

1 Affected Product

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Class Action Complaint

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1
    May 31, 2009 NHTSA ID NUMBER: 10272442
 2
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10272442
 3
    Incident Date April 25, 2008
 4
    Consumer Location Unknown
    Vehicle Identification Number 1FTSW21Y65E****
 5
    Summary of Complaint
    CRASHNo
 6
    FIRENo
 7
    INJURIES0
    DEATHS0
 8
    FRONT END INSTABILITY, EXTREME VIBRATION, LOSS OF STEERING AT HIGHWAY
    SPEED AFTER HITTING ROUGH PAVEMENT. HAVE HAD VIBRATION AND BOUNCE IN
9
    FRONT END SINCE VEHICLE WAS PURCHASED NEW DEC 2004. REPEATED RETURN TO
10
    DEALERSHIP BUT UNABLE TO FIND POINT CAUSE. APRIL 25, 2005 CRUISE CONTROL
    AT 75MPH ON I4 FLORIDA ROUGH ASPHALT TRIGGERED SEVERE SHIMMY AND
11
    VIBRATION, LOSS OF STEERING (UNABLE TO PULL TO SAFETY LANE). CONTROL
    REGAINED ONLY BY BRAKING IN BUSY HIGHWAY SPEED TRAFFIC UNTIL VIBRATION
12
    CEASED. TIRES ARE NEW, ROTATED AT 3,000 AND KEPT AT FACTORY PRESSURE. THESE
13
    EVENTS HAVE OCCURRED SPORADICALLY SINCE PURCHASE IN DEC 2004. *TR
    1 Affected Product
14
15
    June 5, 2009 NHTSA ID NUMBER: 10272963
16
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 10272963
17
    Incident Date April 26, 2009
18
    Consumer Location Unknown
    Vehicle Identification Number 1FTSX21595E****
19
    Summary of Complaint
    CRASHNo
20
    FIRENo
21
    INJURIES0
    DEATHSO
22
    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
23
    OVER EVEN THE SMALLEST OF BUMPS. YOU NEED TO ALMOST STOP IN THE MIDDLE OF
24
    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
25
    THIS IS A REAL ISSUE AND NEEDS TO BE RECALLED. IT IS ALSO REFERENCED AS
    "DEATH WOBBLE". *TR
26
    1 Affected Product
27
28
    June 25, 2011 NHTSA ID NUMBER: 10408904
                                         -196-
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Class Action Complaint

1 **Components: SUSPENSION NHTSA ID Number:** 10408904 2 **Incident Date June 17, 2011** Consumer Location HENDERSON, NV 3 Vehicle Identification Number 1FTSW21P65E**** 4 **Summary of Complaint CRASHNo** 5 **FIRENo INJURIES0** 6 **DEATHSO** 7 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 8 UNCONTROLLABLY. I VERY NEARLY LOST COMPLETE CONTROL OF THE TRUCK. THIS NEVER HAPPENED BEFORE, BUT HAS HAPPENED TWICE SINCE. THE TIRE PRESSURE 9 WAS CORRECT AT THE TIME OF THE FIRST INCIDENT, THE TIRES WERE BALANCED AND 10 THE LUG NUTS WERE TORQUED TO FORD SPECS. REPLACED FRONT STEERING DAMPER, DID NOT RESOLVE THE PROBLEM. TALKED TO THE FORD DEALER AND THEY DENIED 11 ANY KNOWLEDGE OF A SIMILAR PROBLEM. AFTER A FEW HOURS RESEARCH ONLINE, THIS PROBLEM IS WELL DOCUMENTED AND FREQUENT WITH THE FORD 12 SUPER DUTY LINE FROM 05"-08". IT SEEMS TO BE AN ENGINEERING DEFECT AND FORD 13 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 14 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 15 PROBLEM NEEDS TO BE ACKNOWLEDGED AND CORRECTED BEFORE SOMEONE IS 16 KILLED. *TR **1 Affected Product** 17 18 May 14, 2012 NHTSA ID NUMBER: 10458496 19 **Components: STEERING, SUSPENSION NHTSA ID Number:** 10458496 20 **Incident Date** May 15, 2008 21 Consumer Location GARDEN GROVE, CA Vehicle Identification Number 1FTSW21P95E**** 22 **Summary of Complaint CRASHNo** 23 **FIRENo** 24 **INJURIES0 DEATHSO** 25 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 26 IN THE ROAD, THE FRONT SUSPENSION STARTED TO SHAKE UNCONTROLLABLY. IT IS 27 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 28 WERE BALANCED AND THE LUG NUTS WERE TORQUED TO FORD SPECS. TALKED TO -197-

Class Action Complaint

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1
   THE FORD DEALER AND THEY DENIED ANY KNOWLEDGE OF A SIMILAR PROBLEM.
    AFTER A FEW HOURS RESEARCH ONLINE, THIS PROBLEM IS WELL DOCUMENTED AND
2
    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
3
   APPEAR THAT FORD HAS OFFERED ANY REMEDIES. THE NHTSA ALSO KNOWS OF THE
4
    PROBLEM. I VIEWED FOUR NHTSA VIDEOS THAT DEMONSTRATED THE IDENTICAL
   PROBLEM THAT I AM EXPERIENCING WITH MY TRUCK. I HAVE FOUND NO ACTION ON
5
    THE PART OF THE NHTSA. THIS PROBLEM NEEDS TO BE ACKNOWLEDGED AND
    CORRECTED BEFORE SOMEONE IS KILLED. *JS
6
    1 Affected Product
7
8
    December 5, 2012 NHTSA ID NUMBER: 10487500
9
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10487500
10
   Incident Date November 30, 2005
    Consumer Location LYNDEN, WA
11
    Vehicle Identification Number N/A
12
   Summary of Complaint
    CRASHNo
13
   FIRENo
   INJURIES0
14
    DEATHSO
15
   WHILE DRIVING DOWN THE ROAD, HIT A SMALL POTHOLE IN THE ROAD AND THE
   SUSPENSION STARTED TO VIOLENTLY SHAKE THE TRUCK ALONG WITH SEVERE
16
    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
17
    MY TRUCK MULTIPLE TIMES THROUGHOUT THE YEARS AT SPEEDS ANYWHERE FROM
18
   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
    SUSPENSION AND TIRES SINCE THE ORIGINAL TIME THIS HAPPENED AND ADDED A
   STEERING STABILIZER WHICH HELPED TO KEEP THIS FROM OCCURRING BUT IT STILL
20
    HAPPENS ON OCCASION. THIS PROBLEM WAS BROUGHT UP TO MY DEALER AT THE
21
    BEGINNING AND THEY SAID THEY COULD FIND NO PROBLEMS. THE SHAKING AND
    BEATING OF THE VEHICLE WHEN THIS OCCURS IS UNBELIEVABLE. I FULLY BELIEVE
22
    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
23
    THAT IS ALLOWING EXHAUST FUMES INTO THE CAB. *TR
24
    1 Affected Product
25
26
    December 6, 2005 NHTSA ID NUMBER: 10144546
    Components: STEERING
27
    NHTSA ID Number: 10144546
    Incident Date July 30, 2005
28
    Consumer Location LAS CRUCES, NM
                                        -198-
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Class Action Complaint

1 Vehicle Identification Number 1FTSW21505E**** **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** WHILE TRAVELING ON THE HIGHWAY AT 75 MPH AS I HIT BUMPS IN THE ROADWAY 5 THE VEHICLE FEELS LIKE THE FRONT WHEELS ARE HOPPING. ON 5 OCCASIONS I WAS TRAVELING OVER AN OVERPASS WERE THERE IS A SEEM FROM THE 2 DIFFERENT 6 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 55 MPH THE SHAKING WOULD STOP. AT SLOWER SPEEDS THE SAME VIBRATION IS FELT 8 BUT AT A MUCH LESS MAGNITUDE AND SEVERITY. THIS LOSS OF CONTROL AS WELL AS THE SLOWING IN LANES OF TRAFFIC COULD CAUSE SERIOUS LOSS OF CONTROL 9 AND CAUSE OF CRASH. DEALER, BORMAN AUTOPLEX LAS CRUCES,NM, HAD NO 10 ANSWER AS THE VIOLENT SHAKING WAS NOT DUPLICATED NEAR OUR CITY. (ALL OCCURRENCES HAPPENED ON TRIPS). DEALER STATED NOTHING WAS WRONG AND 11 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 12 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 **Components: STEERING** 16 NHTSA ID Number: 10176685 **Incident Date** November 15, 2006 17 **Consumer Location FAYETTEVILLE. AR** 18 Vehicle Identification Number 1FDSX21545E**** **Summary of Complaint** 19 **CRASHNo FIRENo** 20 **INJURIES0** 21 **DEATHSO** (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 24 THE FRONT TIRES, BUT THE ENTIRE FRONT AXLE. THIS HAS HAPPENED TWICE, ONCE BEFORE THE FIRST SET OF REPAIRS. ONCE AFTER THE FIRST SET OF REPAIRS. VEHICLE 25 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 26 STEERING BOX WAS REPLACED. AFTER THE SECOND TIME THE VEHICLE RAN OFF THE 27 ROAD, THE VEHICLE'S ALIGNMENT WAS CHECKED, THE TIRES WERE ROTATED, THE TIRE PRESSURE WAS ADJUSTED. THE DEALER PERFORMED ALL THE STEPS 28 OUTLINED IN A TECHNICAL SERVICE BULLETIN, BUT SAID THAT THEY FOUND -199-

Class Action Complaint

1 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 2 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 3 SIMILAR PROBLEMS. WE HAVE BEEN TOLD THAT AN AFTERMARKET STEERING 4 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 5 CONVINCED THE PROBLEM IS DESIGN RELATED. THE FRONT END DESIGN ON THESE TRUCKS WAS CHANGED IN LATE 2004, AND THE OSCILLATION PROBLEM APPEARS TO 6 BE RELATED TO A LACK OF 7 LATERAL (BY THAT I MEAN SIDE TO SIDE) STIFFNESS IN THE SUSPENSION. *NM **1 Affected Product** 8 9 April 25, 2007 NHTSA ID NUMBER: 10188890 10 **Components: STEERING NHTSA ID Number:** 10188890 11 **Incident Date** April 24, 2007 12 **Consumer Location EASTCHESTER, NY** Vehicle Identification Number 1FTSW21565E**** 13 **Summary of Complaint CRASHYes** 14 **FIRENo** 15 **INJURIES0 DEATHS0** 16 SHORTLY AFTER I PURCHASED MY 2005 FORD F-250 SUPER DUTY PICKUP I EXPERIENCED A VIOLENT VIBRATION IN THE STEERING, WHEN TRAVELING OVER 55 17 MPH, AFTER HITTING A SMALL BUMP IN THE ROAD. WHEN I BROUGHT MY TRUCK IN 18 FOR SERVICE AND MENTIONED THIS EPISODE. THE SERVICE MANAGER ACTED AS THOUGH IT WERE AN ANOMALY, MAYBE THE ROAD CONDITIONS OR SOMETHING ELSE. 19 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

24 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

I WAS TRAVELING AT ABOUT 60 MILES AN HOUR ON THE HIGHWAY. WHEN I WENT

WITH A FUEL TRUCK AND SEVERAL OTHER CARS ON MY WAY OFF THE ROAD AND

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

ONLY DID I LOOSE STEERING BUT, I WAS SURPRISED THAT SUCH A VIOLENT EPISODE DID NOT DEPLOY THE AIR BAGS. I RETURNED TODAY TO THE DEALER WITH MY

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

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Class Action Complaint

Case No.

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23

27

28

AND MAGICALLY HE WAS ABLE TO FIND EVERY OTHER RECORD OF SERVICE AND 1 REPAIRS, EXCEPT THE STEERING COMPLAINTS. TOMORROW, THE 26TH, I HAVE AN 2 APPOINTMENT WHERE I HOPE TO HAVE THIS CORRECTED. ALTHOUGH THIS SERVICE MANAGER SAYS HE HASN'T HEARD OF ANY PROBLEMS WITH THESE TRUCKS. I WAS 3 SEARCHING THE INTERNET AND FOUND MULTIPLE COMPLAINTS ON DIFFERENT SITES. 4 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 5 COMPANY. *JB 1 Affected Product 6 7 July 31, 2007 NHTSA ID NUMBER: 10197931 8 **Components: STEERING** NHTSA ID Number: 10197931 9 **Incident Date** December 1, 2006 10 Consumer Location CAMPBELLSBURG, KY Vehicle Identification Number 1FTSX21585E**** 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHS0** 14 TL*THE CONTACT OWNS A 2005 FORD F-250 SUPERDUTY. THE CONTACT STATED THAT 15 HE LOSES CONTROL OF THE VEHICLE WHEN DRIVING OVER A SPEED BUMP OR A BUMP IN THE ROAD AT 30 MPH. THE VEHICLE BEGINS TO SHAKE UNEXPECTEDLY AND 16 BECOMES DIFFICULT TO STEER. HE TOOK THE VEHICLE TO THE DEALER ONCE, BUT THEY WERE UNABLE TO FIND ANYTHING WRONG. THE CURRENT MILEAGE WAS 17 32,000 AND FAILURE MILEAGE WAS 16,000. 18 **1 Affected Product** 19 20 March 1, 2010 NHTSA ID NUMBER: 10315150 **Components: STEERING** 21 NHTSA ID Number: 10315150 **Incident Date** February 21, 2010 22 Consumer Location NORTH RICHLAND HILLS, TX 23 Vehicle Identification Number 1FTSW21P75E**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** I HAVE A FORD F250 SUPER DUTY. AFTER HITTING A SMALL DIP IN THE ROAD, MY 27 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. 28 PROBABLY COULD BE MY TIRES. BOUGHT NEW TIRES AND A COUPLE OF WEEKS

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LATER,, THE SAME THING HAPPENED AGAIN. IF I WAS TRAVELING ANY FASTER, I 1 TRULY BELIEVE I WOULD HAVE LOST CONTROL. I HAVE BEEN DRIVING FIRE 2 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 3 FORD. *TR 4 1 Affected Product 5 May 28, 2010 NHTSA ID NUMBER: 10332685 6 **Components: STEERING** 7 NHTSA ID Number: 10332685 **Incident Date** April 23, 2010 8 Consumer Location LEBANON, PA Vehicle Identification Number 1FPFW21525E**** 9 **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** TL*THE CONTACT OWNS A 2005 FORD F250 SUPER DUTY. THE CONTACT STATED THAT 13 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 14 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 MILEAGE WAS APPROXIMATELY 60,000. THE CURRENT MILEAGE WAS APPROXIMATELY 17 66.500. UPDATED 11/03/10. *LJ 18 **1 Affected Product** 19 20 June 13, 2009 NHTSA ID NUMBER: 10273718 Components: SUSPENSION, STEERING 21 NHTSA ID Number: 10273718 **Incident Date June 13, 2009** 22 Consumer Location WEST PITTSTON, PA 23 Vehicle Identification Number 1FTNF21535E**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** I EXPERIENCED A SEVERE AND VIOLENT SHAKING OF THE FRONT END OF MY 2005 27 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 28 HIGHWAY. I WAS ALMOST HIT BY THE VEHICLE DIRECTLY BEHIND ME. THIS IS THE -202-

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THIRD TIME I HAVE LOST CONTROL OF THE TRUCK BECAUSE OF THIS VIOLENT 1 SHAKING IN THE LAST MONTH. I HAVE HAD THE TRUCK TO A LOCAL INSPECTION 2 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 3 FROM AND THEY SAID THEY NEVER HEARD OF ANYONE HAVING THIS PROBLEM WITH ANY FORD TRUCK. OBVIOUSLY, THEY ARE AWARE OF THE PROBLEM. I ONLY 4 HOPE THERE IS A RECALL BEFORE TOO MANY PEOPLE DIE. *TR 5 **1 Affected Product** 6 7 October 12, 2011 NHTSA ID NUMBER: 10429550 **Components: SUSPENSION** 8 NHTSA ID Number: 10429550 9 Incident Date October 8, 2011 Consumer Location TWINSBURG, OH 10 Vehicle Identification Number 1FTSX21555E**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** MY FORD F250 HAS A VERY DANGEROUS WOBBLE WHEN I HIT A BUMP ON THE 14 HIGHWAY. I HAVE CHECKED THE TIRE PRESSURE AND ALL FOUR TIRES ARE FINE. 15 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 16 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 17 AM VERY UPSET AND I AM GOING TO TAKE LEGAL ACTION. *KB 18 **1 Affected Product** 19 20 September 1, 2009 NHTSA ID NUMBER: 10282585 **Components: STEERING** 21 NHTSA ID Number: 10282585 **Incident Date June 5, 2009** 22 Consumer Location MEDFORD, MA 23 **Vehicle Identification Number N/A Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** TL*THE CONTACT OWNS A 2005 FORD F250. WHILE DRIVING APPROXIMATELY 65 MPH 27 DRIVING OVER A SMALL ROAD BUMP: THERE WAS A VIOLENT SHAKE AND VIBRATION. UNEXPECTEDLY, THE VEHICLE LOSS CONTROL FOR APPROXIMATELY 6-8 SECONDS. 28 THERE WAS A SUDDEN RELEASE OF THE ACCELERATOR PEDAL; HOWEVER, THE -203-

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1 DRIVER WAS ABLE TO GAIN CONTROL OF THE VEHICLE AND RESUME OPERATION. THE FAILURE RECURRED AT VARIOUS SPEEDS. THE VEHICLE WAS TAKEN TO AN 2 AUTHORIZED DEALER FOR INSPECTION; HOWEVER, THE TECHNICIAN WAS UNABLE TO DUPLICATE THE FAILURE. THE VEHICLE WAS TAKEN TO AN 3 AUTHORIZED DEALER ON FOUR SEPARATE OCCASIONS FOR THE IDENTICAL FAILURES WHICH THERE WERE NO RESOLUTIONS. THE CONTACT HAD CONCERNS 4 OF THE SAFETY RISK INVOLVED. THE VIN WAS UNAVAILABLE. THE FAILURE MILEAGE 5 WAS 200. THE CURRENT MILEAGE WAS 47,000. 1 Affected Product 6 7 September 23, 2010 NHTSA ID NUMBER: 10357223 8 **Components: STEERING** NHTSA ID Number: 10357223 9 **Incident Date** May 11, 2010 10 Consumer Location DELEVAN, NY **Vehicle Identification Number** 1FTSX215X5E**** 11 **Summary of Complaint** 12 **CRASHNo FIRENO** 13 **INJURIES0 DEATHSO** 14 TL*THE CONTACT OWNS A 2005 FORD F-250. THE CONTACT STATED THAT THE FRONT 15 STARTED SHAKING BETWEEN 55 AND 65 MPH. THE VEHICLE WAS SHAKING EXCESSIVELY THEREFORE; THE SPEED WOULD NOT INCREASE. THE VEHICLE WAS NOT 16 INSPECTED. THE VEHICLE WOULD ALSO SHAKE EXCESSIVELY WHILE DRIVING OVER A BUMP IN THE ROAD. THE DEALER STATED THAT THEY HAD NOT HEARD OF THE 17 FAILURE AND THAT THE WARRANTY EXPIRED. THE FAILURE MILEAGE WAS 45000 18 AND THE CURRENT MILEAGE 50000. 1 Affected Product 19 20 May 2, 2011 NHTSA ID NUMBER: 10398511 21 **Components: STEERING** NHTSA ID Number: 10398511 22 **Incident Date** April 30, 2011 23 Consumer Location OWOSSO, MI **Vehicle Identification Number N/A** 24 **Summary of Complaint CRASHNo** 25 **FIRENo** 26 INJURIES0 **DEATHSO** 27 TL*THE CONTACT OWNS A 2005 FORD F-250. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 55 MPH WHEN THE STEERING WHEEL SUDDENLY VEERED 28 TO THE RIGHT. AS HE CORRECTED THE STEERING WHEEL IT VEERED TO THE LEFT -204-Class Action Complaint

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1
    SENDING HIM ACROSS TWO LANES OF TRAFFIC AND DROVE INTO THE MEDIAN. THE
    VEHICLE WAS TAKEN TO A DEALER WHO ADVISED HIM THAT THEY WERE UNABLE
2
    TO DIAGNOSE THE FAILURE. THE VEHICLE WAS NOT REPAIRED. THE
    MANUFACTURER WAS NOT CONTACTED. THE FAILURE MILEAGE WAS
3
    APPROXIMATELY 68.000. THE VIN WAS UNAVAILABLE.
4
    1 Affected Product
5
    December 9, 2011 NHTSA ID NUMBER: 10439148
6
    Components: STEERING
7
    NHTSA ID Number: 10439148
    Incident Date January 1, 2010
8
    Consumer Location BROKEN ARROW, OK
    Vehicle Identification Number 1FTSX21P65E****
9
    Summary of Complaint
10
    CRASHNo
    FIRENo
11
    INJURIES0
12
    DEATHS0
    TL* THE CONTACT OWNS A 2005 FORD F-250. THE CONTACT STATED THAT WHEN WHILE
13
    DRIVING OVER A ROAD BUMP, THE VEHICLE WOULD JERK VIOLENTLY. THE VEHICLE
    WAS TAKEN TO THE DEALER WHO WAS UNABLE TO DIAGNOSE THE FAILURE. THE
14
    VEHICLE WAS THEN TAKEN TO A LOCAL MECHANIC WHO DIAGNOSED THAT THE
15
    VEHICLE NEEDED TO HAVE A CAMBER ALIGNMENT PERFORMED. THE
    MANUFACTURER WAS MADE AWARE OF THE FAILURE WHO DID NOT OFFER ANY
16
    ASSISTANCE. THE VEHICLE WAS REPAIRED. THE FAILURE MILEAGE WAS 50,000 AND
    THE CURRENT MILEAGE WAS 91,000. UPDATED 02/27/12 *BF
17
    1 Affected Product
18
    1 Associated Document
19
    April 3, 2006 NHTSA ID NUMBER: 10154404
20
    Components: SUSPENSION
21
    NHTSA ID Number: 10154404
    Incident Date April 3, 2006
22
    Consumer Location BLOOMFIELD, NJ
23
    Vehicle Identification Number 1FTWF315X5E****
    Summary of Complaint
24
    CRASHNo
    FIRENo
25
    INJURIES0
26
    DEATHSO
    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
    NORMAL OPERATING CONDITIONS DUE TO THE SIZE OF THE VEHICLE.
28
    1 Affected Product
                                        -205-
    Class Action Complaint
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Incident Date March 1, 2009 **Consumer Location PORT GAMBLE, WA** -206-Class Action Complaint Case No.

Vehicle Identification Number 1FTWW31Y25E**** 1 **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** 1. IF I DRIVE OVER A BUMP IN THE ROAD AT 50MPH OR FASTER. 2. FRONT END SHIMMY. 5 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 6 OF THE TRUCK. IT HAS SHAKEN MY TRUCK SO VIOLENTLY THAT IT HAS DAMAGED MY 7 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 8 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. I HAVE TAKEN 9 THE TRUCK TO THE DEALERSHIP TO GET REPAIRED AND THEY TELL ME NOTHING 10 IS WRONG WITH MY TRUCK. 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 12 DOCUMENTED THE PROBLEM, BUT BECAUSE THE TRUCK IS OUT OF WARRANTY I 13 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 OR 5 TIMES BEFORE I GOT THIS LETTER. I ALSO DID A GOOGLE SEARCH TODAY ABOUT 15 THIS PROBLEM AND YOU CAN SEE THAT MANY PEOPLE POST ONLINE ABOUT THIS 16 VERY PROBLEM. HOPE THIS BECOMES A RECALL SO I CAN KEEP ME AND MY FAMILY SAFE. THANK YOU. *TR 17 1 Affected Product 18 19 September 5, 2008 NHTSA ID NUMBER: 10241025 **Components: STEERING** 20 NHTSA ID Number: 10241025 21 **Incident Date** April 19, 2008 Consumer Location ALGONOUIN, IL 22 Vehicle Identification Number 1FTWW31PX5E**** **Summary of Complaint** 23 **CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** TL*THE CONTACT OWNS A 2005 FORD F-350 SUPERDUTY. THE CONTACT STATED THAT 26 THE STEERING WHEEL SHOOK SO VIOLENTLY THAT HE LOST CONTROL. WHILE 27 DRIVING 65 MPH, HE WAS INCAPABLE OF CONTROLLING THE STEERING. IT WOULD MOVE FROM LEFT TO RIGHT AND HE UNSUCCESSFULLY COMPENSATED FOR THE 28 FAILURE. THE VEHICLE WAS TAKEN TO THE DEALER TWICE, BUT THEY COULD -207-

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NOT DUPLICATE THE FAILURE. THE DEALER STATED THAT NOTHING WAS WRONG 1 WITH THE VEHICLE. THE MANUFACTURER HAS NOT BEEN NOTIFIED. THE CURRENT 2 MILEAGE WAS APPROXIMATELY 95,000 AND FAILURE MILEAGE WAS APPROXIMATELY 93,000. 3 **1 Affected Product** 4 5 July 27, 2008 NHTSA ID NUMBER: 10235894 **Components: SUSPENSION** 6 NHTSA ID Number: 10235894 7 Incident Date October 5, 2006 Consumer Location SANTA CLARITA, CA 8 Vehicle Identification Number 1FTWW33P55E**** **Summary of Complaint** 9 **CRASHNo** 10 **FIRENo INJURIES0** 11 **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. THE 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 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 16 PROBLEM. THIS PROBLEM OCCURS EVERY TIME I DRIVE THE VEHICLE AND FORD IN NOT RESPONSIVE TO THE PROBLEM. *TR 17 1 Affected Product 18 19 January 10, 2011 NHTSA ID NUMBER: 10377298 Components: SUSPENSION, STEERING 20 NHTSA ID Number: 10377298 21 **Incident Date** September 30, 2005 Consumer Location ANDOVER, NJ 22 Vehicle Identification Number 1FTWX31P25E**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 WHEN I'M DRIVING AT SPEEDS OF 65 TO 70 AND GO OVER A BUMP IN ROAD THE STEERING WHEEL SHAKES OUT OF CONTROL. I HAD BROUGHT IT BACK TO DEALER 27 TO HAVE SERVICED AND THEY TOLD ME "THERE IS NO PROBLEM, THAT'S WHAT YOU GET FROM A HEAVY DUTY TRUCK." WHAT A LOAD OF CRAP! I HAVE PAPER 28 WORK DOCUMENTING THE TRUCK WENT TO DEALER FOR STEERING OUT OF CONTROL. -208-Class Action Complaint

SINCE THEN THE SHAKING HAS CAUSED ME TO REPLACE BALL JOINTS AND OTHER 1 PARTS TRYING TO STOP THE PROBLEM. THIS SHOULDN'T HAPPEN ON NEW VEHICLE, 2 MUCH LESS ONE THAT COSTS \$45,000. THIS REALLY MAKES ME MAD. **1 Affected Product** 3 4 September 18, 2009 NHTSA ID NUMBER: 10284483 5 **Components: STEERING** NHTSA ID Number: 10284483 6 **Incident Date** September 12, 2009 7 Consumer Location DURANT, OK Vehicle Identification Number 1FTWW33P65E**** 8 **Summary of Complaint CRASHYes** 9 **FIRENo** 10 **INJURIES0 DEATHS0** 11 I HAVE A FORD F350 HEAVY DUTY 1 TON, I HAD EXPERIENCED ON SEPARATE 12 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 EFFECT. I HAVE HAD MY TIRE PRESSURE CHECKED ON NUMEROUS OCCASIONS, I HAVE 14 ALSO HAD TAKEN MY TRUCK TO LOCAL DEALERSHIP TO CHECK FRONT 15 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 16 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 THROWING THE TRUCK NEARLY ON ITS SIDE LANDING IN ONCOMING TRAFFIC FACING 19 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 20 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 INJURIES. I FEEL LIKE FORD HAS NOT OWN UP TO DEFECT OF THE TRUCK SUSPENSION. 23 MAYBE DOT SHOULD INVESTIGATE FORD AGAIN. *TR 24 **1 Affected Product** 25 26 January 6, 2010 NHTSA ID NUMBER: 10298418 **Components: STEERING** 27 NHTSA ID Number: 10298418 **Incident Date** January 8, 2007 28 Consumer Location FERNLEY, NV -209-Class Action Complaint

1 Vehicle Identification Number 1FTWW31P95E**** **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** TL*THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT WHILE 5 DRIVING 55 MPH OVER A BUMP, THE FRONT END OF THE VEHICLE WOULD SHAKE VIOLENTLY. THE CONTACT ASKED THE DEALER ABOUT THE FRONT END SHAKE 6 AND THE DEALER STATED THEY'VE NEVER HEARD OF THIS ISSUE. TWO OTHER 7 DEALERS INFORMED THE CONTACT THAT VEHICLE NEEDED TO HAVE THE TIRES REPLACED. THE CONTACT REPLACED THE TIRES AND THE VIOLENT SHAKING STILL 8 OCCURRED WHENEVER THE CONTACT DROVE OVER A BUMP AT HIGHWAY SPEEDS. THE FAILURE MILEAGE WAS 19,000. 9 **1 Affected Product** 10 11 July 24, 2008 NHTSA ID NUMBER: 10235638 12 Components: SUSPENSION, STEERING NHTSA ID Number: 10235638 13 **Incident Date June 18, 2008** Consumer Location BLOWING ROCK, NC 14 Vehicle Identification Number 1FTSX21586E**** 15 **Summary of Complaint CRASHNo** 16 **FIRENo INJURIES0** 17 **DEATHS0** 18 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 19 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 20 NOTHING WRONG WITH MY TRUCK. THEY CLAIMED IT WAS PROBABLY DUE TO LOW 21 AIR PRESSURE IN THE TIRES. AFTER RESEARCHING THIS PROBLEM ON MY OWN I DISCOVERED THAT THIS IS OUITE A COMMON PROBLEM AND MANY MANY FORD 22 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 23 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 25 POTENTIALLY LIFE THREATENING PROBLEM! THESE TRUCKS NEED TO BE RECALLED AND HAVE THEIR STEERING DAMPNERS REPLACED! AFTER FIVE DAYS OF ARGUING 26 WITH THE FORD DEALERSHIP I HAVE YET TO GET MY TRUCK BACK. I DEMANDED A 27 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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Class Action Complaint

1 1 Affected Product 2 April 29, 2009 NHTSA ID NUMBER: 10267286 3 **Components: STEERING, SUSPENSION** 4 NHTSA ID Number: 10267286 Incident Date October 24, 2006 5 Consumer Location YUBA CITY, CA Vehicle Identification Number 1FTSW21P46E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 3-13-09 I TOOK MY FORD F-250 TO THE DEALERSHIP I PURCHASED IT FROM DUE TO A 10 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 THAN THE TIRE PRESSURE WAS LOW AND IT TOOK CARE OF 85% OF THE SHIMMY. 13 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 **1 Affected Product** 16 17 May 1, 2009 NHTSA ID NUMBER: 10267467 18 **Components: SUSPENSION** NHTSA ID Number: 10267467 19 **Incident Date** April 21, 1997 Consumer Location SPRING CREEK, NV 20 Vehicle Identification Number 1FTSW21P66E**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo** 23 **INJURIES0 DEATHS0** 24 TL*THE CONTACT OWNS A 2006 FORD F-250. WHILE DRIVING 45 MPH, THE FRONT END OF THE VEHICLE JUMPED UP AND DOWN. IT FELT AS IF THE FRONT TIRE WAS 25 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 COULD NOT FIND ANY FAILURES WITH THE VEHICLE. THE FAILURE WAS LABELED 27 AS THE DEATH WOBBLE AND HAS OCCURRED ON FIVE OCCASIONS. THE VEHICLE WAS REPAIRED AT THE CONTACT'S EXPENSE. HEAVIER SHOCKS AND A STEERING 28 STABILIZER WERE INSTALLED ON THE VEHICLE. THE CONTACT RECEIVED A LETTER IN -211-Class Action Complaint

THE MAIL FROM FORD REGARDING THESE ONGOING FAILURES. THE FAILURE MILEAGE 1 WAS 6,000 AND CURRENT MILEAGE WAS 69,000. 2 1 Affected Product 3 4 August 20, 2009 NHTSA ID NUMBER: 10281230 **Components: SUSPENSION** 5 NHTSA ID Number: 10281230 **Incident Date** May 1, 2009 6 Consumer Location PARAMUS, NJ 7 **Vehicle Identification Number N/A Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHS0** MY 2006 FORD F250 4WD SUPERDUTY PICKUP SHAKES VIOLENTLY WHENEVER I HIT 11 THE SMALLEST POTHOLE OR DRIVE OVER RAILROAD TRACKS. IT IS A DANGER TO 12 MYSELF, MY CHILDREN AND ANYONE DRIVING AROUND ME ON THE ROAD. TOOK THE 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 WAS NOTHING WRONG WITH THE TRUCK, THEY NEVER HEARD OF THIS PROBLEM 14 AND I NEED TO BUY NEW TIRES. TIRES ARE BRAND NEW WITH LESS THAN 20K ON 15 THEM. *TR 1 Affected Product 16 17 April 16, 2010 NHTSA ID NUMBER: 10326010 18 **Components: SUSPENSION** NHTSA ID Number: 10326010 19 **Incident Date** February 13, 2010 Consumer Location YORBA LINDA, CA 20 Vehicle Identification Number 1FTSW21P46E**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo** 23 **INJURIES0 DEATHS0** 24 MY FORD F250 4X4 TRUCK HAS A SEVERE SHIMMY OF THE FRONT WHEELS WHICH CAN OCCUR WHEN DRIVING AROUND 55-60 MILES PER HOUR. IN ORDER TO CALM THE 25 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 THE SUSPENSION AND ADJUST THE TIRE PRESSURE, BUT THEY SAID IT WAS ALL 28 FINE. I HAD AN OCCURRENCE OF THIS SHIMMY WITHIN 3 DAYS FROM TAKING IT FROM -212-Class Action Complaint

THE DEALER. I HAVE SEEN THERE HAS BEEN SOME REPORT ON THIS TYPE OF 1 BEHAVIOR, AND FORD HAS STATED IT IS A TIRE INFLATION PROBLEM, BUT AFTER 2 TAKING IT INTO THE FORD DEALER AND THEM CHECKING IT OUT AND THEN IT HAPPENING, I THINK IT IS SOMETHING MORE SERIOUS. *TR 3 **1 Affected Product** 4 5 October 13, 2010 NHTSA ID NUMBER: 10360390 **Components: STEERING, SUSPENSION** 6 **NHTSA ID Number:** 10360390 7 **Incident Date** September 30, 2010 Consumer Location WEST POINT, MS 8 Vehicle Identification Number N/A **Summary of Complaint** 9 **CRASHNo** 10 **FIRENo INJURIES0** 11 **DEATHS0** 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. I HAVE BEEN BACK TO THE DEALER AND THEY TELL ME THERE IS NOTHING 14 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 **Components: SUSPENSION** 18 NHTSA ID Number: 10174494 Incident Date November 20, 2006 19 Consumer Location SAINT JAMES CITY, FL Vehicle Identification Number 1FTSW21596E**** 20 **Summary of Complaint** 21 **CRASHNo FIRENo** 22 **INJURIES0** 23 **DEATHS0** VEHICLE SHAKES UNCONTROLLABLY AFTER HITTING A BUMP IN THE ROAD AT 24 HIGHWAY SPEEDS OF 60 TO 75 MPH. VEHICLE MUST BE BROUGHT TO A COMPLETE STOP TO REGAIN CONTROL, THEN RIDES SMOOTHLY. VEHICLE WAS TAKEN TO THE 25 DEALERSHIP TO FIX THE PROBLEM, DEALER STATED THAT THE PROBLEM DID NOT OCCUR DURING A ROAD TEST OF 22 MILES. THE SERVICE ADVISOR STATES 26 THAT NOTHING IS WRONG WITH THE VEHICLE. THIS IS THE FOURTH TIME THIS 27 PROBLEM HAS HAPPENED IN 35000 MILES. DEALER REFUSED TO TEST DRIVE IN A SPECIFIC AREA WERE THE PROBLEM HAS OCCURRED MULTIPLE TIMES. THE TRUCK IS 28 UNSAFE FOR INTERSTATE DRIVING. *JB -213-Class Action Complaint

1 1 Affected Product 2 September 26, 2007 NHTSA ID NUMBER: 10204198 3 Components: SUSPENSION, STEERING 4 NHTSA ID Number: 10204198 Incident Date September 26, 2007 5 Consumer Location ALVARADO, TX Vehicle Identification Number 1FTSW21P56E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 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 COMPLETE STOP, REGAIN CONTROL, AND THEN RESUME DRIVING. THIS IS ESPECIALLY 11 HAZARDOUS ON THE SMALL COUNTY ROADS WE LIVE ON, AND WHEN YOU HAVE TO 12 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 13 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 14 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 MANY OTHERS OUT THERE WITH THE SAME PROBLEM. I AM FURIOUS THAT I SPENT 16 \$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 17 MENTION A DANGER TO MY FAMILY'S WELL BEING. WHAT IS IT GOING TO TAKE FOR 18 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 19 ISSUE??? *TR **1 Affected Product** 20 21 November 7, 2008 NHTSA ID NUMBER: 10247920 22 **Components: SUSPENSION** 23 NHTSA ID Number: 10247920 Incident Date October 28, 2008 24 Consumer Location SELBYVILLE, DE Vehicle Identification Number 1FTSW21516E**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHSO** 28 -214-Class Action Complaint

1 I HAVE A 2006 FORD F250 4X4 CREWCAB WITH A SHORTBED THAT HAD PROBLEMS WITH VIOLENT FRONT END OSCILLATION. SEE ODI RESUME INVESTIGATION EA 08-007. 2 AFTER THE LAST INCIDENT ON 8/2/2006, I HAD THE VEHICLE TOWED TO MY LOCAL FORD DEALER ON 8/5/2006. THIS WAS NOW THE SECOND TIME VEHICLE WAS BROUGHT 3 INTO A FORD DEALERSHIP FOR THIS PROBLEM. THE FIRST DEALERSHIP REQUIRED 4 THAT I REPRODUCE THIS PROBLEM FOR THE TECH WORKING ON THE VEHICLE. I WAS TOLD EVERYTHING WAS FINE WITH THE VEHICLE. THIS SECOND DEALERSHIP 5 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 6 CHAMBER OR CASTER WAS WAY OFF. I WAS ALSO TOLD TO MAKE SURE AND ROTATE 7 TIRES AT SUGGESTED INTERVALS AND TO KEEP TIRES PROPERLY INFLATED. I NOTICED WHEN I LEFT THAT THE TRUCK HAD A CHOPPY BOUNCE TO THE RIDE AND WAS TOLD 8 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 9 TO THE DEALERSHIP WHERE I PURCHASED THE TRUCK. THEY ROAD TESTED THE 10 TRUCK, THEN REBALANCED ALL 4 TIRES AND REINDEXED THE REAR TIRES. THESE ARE THE TIRES THAT WERE ORIGINALLY ON THE FRONT AND ROTATED AT THE SECOND 11 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 HAVE 12 RODE THAT WAY WHEN I PURCHASED IT, I WOULD HAVE NEVER PURCHASED IT. I 13 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 THAT 14 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 15 OTHERS HAVE WITH THAT YEAR ALSO. TURNING TO FORD IN THIS MATTER HAS 16 PROVED POINTLESS IN THEIR WILLINGNESS TO ADMIT A PROBLEM WITH THIS VEHICLE OR THEIR OWN ENGINEERING FLAWS. I AM CURRENTLY TRYING TO HAVE AN 17 ENGINEER FROM FORD LOOK AT THIS VEHICLE. *TR 1 Affected Product 18

20 November 14, 2008 NHTSA ID NUMBER: 10248855

21 Components: SUSPENSION NHTSA ID Number: 10248855

22 | Incident Date October 1, 2006

Consumer Location LA MESA, CA

23 || Vehicle Identification Number 1FTSW21P26E****

Summary of Complaint

24 CRASHNo

25 | FIRENO

19

INJURIES0

26 | **DEATHS0**

27 | 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. THE TRUCK SHAKES, WOBBLES, VIBRATES, AND

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Class Action Complaint

1 HOPS VIOLENTLY AT FREEWAY SPEED WITH DEALERSHIPS TREATING THESE **CONDITIONS AS MYSTERIOUS OR NON-EXISTENT! *TR** 2 1 Affected Product 3 4 August 3, 2009 NHTSA ID NUMBER: 10279266 **Components: SUSPENSION** 5 NHTSA ID Number: 10279266 **Incident Date** July 1, 2009 6 Consumer Location PLACERVILLE, CA 7 Vehicle Identification Number 1FTSW21P96E**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHS0** WITH ONLY 35,000 MILES ON IT, MY 2006 F-250 SD DIESEL TRUCK HAS DEVELOPED A 11 FRIGHTENING BOUNCING IN THE FRONT END. ONCE IT HAPPENED GOING 65 MPH WHEN 12 I HIT A FREEWAY POT HOLE. THE FRONT TIRE BOUNCED UP AND DOWN SO SEVERELY. THAT I PULLED OFF ONTO THE SHOULDER TO SEE IF SOMETHING HAD COME 13 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. THE DEALER FOUND NOTHING 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 DESIGN PROBLEMS? I AM JUST CONCERNED THAT THE BOUNCING COULD CAUSE ME 17 TO LOSE CONTROL OF THE VEHICLE. *TR 18 **1 Affected Product** 19 20 July 15, 2010 NHTSA ID NUMBER: 10343375 21 **Components: STEERING, SUSPENSION** NHTSA ID Number: 10343375 22 **Incident Date** May 18, 2010 Consumer Location APPLE VALLEY, CA 23 Vehicle Identification Number 1FTSW21P86E**** 24 **Summary of Complaint CRASHNo** 25 **FIRENo** 26 **INJURIES0 DEATHSO** 27 VIOLENT SHAKING "DEATH WOBBLE" ON A 2006 FORD F-250 SUPER DUTY 4X4 PICKUP TRUCK. THE TRUCK EXPERIENCES A VIOLENT SHAKING IN THE FRONT END AT SPEEDS 28 OF ABOUT 60-65 MPH. THIS HAPPENS WHILE ACCELERATING OR AFTER HITTING A -216-Class Action Complaint

BUMP IN THE ROAD. IT IS ALMOST IMPOSSIBLE TO CONTROL AND ONLY STOPS WHEN 1 SPEED IS REDUCED. FORD MOTOR COMPANY HAS SENT ME A LETTER NOTIFYING ME 2 OF THIS PROBLEM A YEAR AGO, BUT OFFERS NO FIX FOR THE PROBLEM OTHER THAN A WARNING TO SLOW THE VEHICLE DOWN. LOCAL FORD DEALERSHIP DENIED 3 THERE IS A PROBLEM AND WILL NOT FIX IT. *TR 4 1 Affected Product 5 June 6, 2012 NHTSA ID NUMBER: 10460739 6 Components: STEERING, SUSPENSION 7 **NHTSA ID Number:** 10460739 **Incident Date June 6, 2012** 8 Consumer Location FRANKLIN, IN Vehicle Identification Number 1FTSX21516E**** 9 **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **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! I HAVE CONTACTED SEVERAL DEALERS AND NO ONE SEEMS TO KNOW ABOUT OR HEARD ABOUT IT BUT THERE IS 16 THOUSANDS OF COMPLAINTS ONLINE AND ALSO HAVE RECEIVED A LETTER FROM FORD STATING TO CHECK TIRE PRESSURES! I HAVE DONE WHAT THEY SAID + HAD 17 NEW SHOCKS, HAD NEW TIRES, STRUTS CHECKED, BALL JOINTS CHECKED, AND REAR 18 SUSPENSION LOOKED AT. NOTHING IS WRONG ...THIS IS CLEARLY A FACTORY PROBLEM AND IT NEEDS TO BE TAKEN CARE OF BEFORE PEOPLE START DIEING FROM 19 IT! IS FORD GOING TO RAISE MY CHILDREN WHEN THIS MAKES ME WRECK AND DIE ...NO THEY ARE NOT SO THEY NEED TO GET THIS TAKEN CARE OF. REPORTS SAY THAT 20 THEY HAVE CHANGED THE SET UP ON NEWER HEAVY DUTY TRUCKS BECAUSE OF THIS 21 SO WHY AREN'T THEY TAKING CARE OF THE ONE'S THEY ALREADY SOLD TO THE PUBLIC! PLEASE HELP...YOU CAN FIND TONS OF INFO IF YOU SEARCH " DEATH WOBBLE 22 OR DEATH SHAKE! *TR 1 Affected Product 23 24 July 27, 2007 NHTSA ID NUMBER: 10197626 25 **Components: STEERING** 26 NHTSA ID Number: 10197626 **Incident Date** May 1, 2006 27 Consumer Location AUSTINVILLE, VA Vehicle Identification Number 1FTNF21546E**** 28 **Summary of Complaint** -217-Class Action Complaint

21 22 23 24 25 26

WHEN DRIVING WHEN YOU GO OVER A BUMP, RXR CROSSING OR MAN HOLE COVER 27 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 28

TO BUT THE OUTCOME HAS NOT CHANGED. I HAVE CALLED FORD NUMEROUS

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Class Action Complaint

TIMES, BOTH THE DEALER AND FORD MANUFACTURER. THEY BOTH ACT LIKE 1 THEY HAVE NEVER HEARD OF THIS SEVERE PROBLEM. *TR 2 1 Affected Product 3 4 March 31, 2011 NHTSA ID NUMBER: 10393902 **Components: STEERING** 5 **NHTSA ID Number:** 10393902 Incident Date March 28, 2011 6 Consumer Location JACKSONVILLE, FL 7 Vehicle Identification Number 1FTSW21PX6E**** **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHSO** 2006 FORD F-250 EXPERIENCES A SEVERE VIBRATION BETWEEN 50 - 65 MPH. 11 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 ROD END, STEERING COMPONENT INSPECTED AT MY COST TO INVESTIGATE THE ISSUE. 14 THE STEERING VIBRATION STILL EXISTS. FORUMS AND OTHER SITES HAVE STARTED 15 TO CALL THIS THE "DEATH WOBBLE". ALTHOUGH IT CAN BE ESCAPED BY SLOWING DOWN OR ACCELERATING THROUGH THE VIBRATION, IT CAN EASILY CAUSE LOSS OF 16 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 17 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 ORDER TO PROMPT ACTION FROM EITHER THE NHTSA OR THE FORD MOTOR 20 COMPANY. I DID NOT EXPERIENCE THIS ISSUE TILL APPROXIMATELY 60,000 MILES, 21 SOMETIME AFTER A BRAKE CHANGE. THE SUBSEQUENT ISSUES LEAD ME TO CHANGE THE AFOREMENTIONED EQUIPMENT IN ORDER TO RESOLVE THE ISSUE. TO THIS POINT. 22 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 1 Affected Product 25 26 August 1, 2011 **NHTSA ID NUMBER: 10416598** 27 **Components: STEERING** NHTSA ID Number: 10416598 28 **Incident Date June 22, 2008** -219-

Class Action Complaint

- 1 | Consumer Location COLLIERVILLE, TN
 - || Vehicle Identification Number 1FTSW21P96E****
- 2 Summary of Complaint
- 3 | CRASHNo
 - FIRENo
- 4 | INJURIES0
- | DEATHS0
- 5 THE TRUCK AT 55 65 MPH GOES INTO WHAT HAS BEEN DESCRIBE AS A DEATH
- 6 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
- 7 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. THE FORD
- DEALERSHIP CANNOT FIX IT. 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
- 10 | 1 Affected Product
- 12 | January 28, 2009 NHTSA ID NUMBER: 10256667
- Components: STEERING, SUSPENSION
- 13 **NHTSA ID Number:** 10256667
- 14 | Incident Date May 20, 2008
 - Consumer Location HICKORY, NC
- 15 | Vehicle Identification Number 1FTWW33P46E****
- 16 Summary of Complaint
- CRASHNo
- 17 || FIRENo

11

- INJURIES0
- 18 || DEATHSO
- 19 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
- 20 THE ROAD, THE FRONT END GOES INTO AN UNCONTROLLABLE SHIMMY/OSCILLATION.
- THIS CAN ONLY BE STOPPED BY PULLING OVER AND COMPLETELY STOPPING THE
- 21 VEHICLE. I HAVE TAKEN THE TRUCK TO A FORD DEALERSHIP WHO CHECKED THE
- 22 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
- 24 HAVE SEEN A LOT OF TRUCKS W/ THE SAME PROBLEM, BUT ARE UNABLE TO FIX IT
- 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
- 27 AROUND \$ 48,000.00 AND HAVE HAD THIS PROBLEM SINCE THE TRUCK HAD ABOUT
- 21 | 23000 MILES ON IT. I CANT EVEN DRIVE IT ON THE INTERSTATE DUE TO THE
- 28 UNCONTROLLABLE FRONT END SHIMMY. THE FORD DEALERSHIP WILL NOT ACKNOWLEDGE THAT I HAVE A PROBLEM. I HAVE SEARCHED THE INTERNET AND

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Class Action Complaint

HAVE FOUND POST AFTER POST OF PEOPLE WHO HAVE THE SAME PROBLEM WITH 1 THEIR TRUCK AND THE LACK OF ACKNOWLEDGMENT FROM FORD. THIS IS A VERY 2 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 3 ME. THANK YOU STEPHEN HALL *TR 4 1 Affected Product 5 January 4, 2011 NHTSA ID NUMBER: 10374098 6 **Components: SUSPENSION** 7 NHTSA ID Number: 10374098 **Incident Date** January 3, 2006 8 Consumer Location VIRGINIA BEACH, VA 9 Vehicle Identification Number 1FTWW31P86E**** **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** APPROXIMATELY 1 MONTH AGO I PURCHASED A 2006 FORD F350 SUPER DUTY.WHILE 13 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 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 17 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. I HAVE CONTACTED A LOCAL REPUTABLE FORD DEALER AND THEY INFORMED ME 19 THAT THERE ARE NO RECALLS AS OF TODAY JANUARY 4 2011. *TR 1 Affected Product 20 21 April 4, 2011 NHTSA ID NUMBER: 10394247 22 **Components: STEERING, SUSPENSION** 23 NHTSA ID Number: 10394247 **Incident Date** April 2, 2011 24 Consumer Location LEBANON, OR Vehicle Identification Number 1FTWW31P36E**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHS0** 28 -221-Class Action Complaint

FORD F350 DEATH SHAKE HAS HAPPENED MULTIPLE TIMES TRUCK HITS BUMP OR POT 1 HOLE REGARDLESS OF SPEED (BUT SHAKE IS WORSE OVER 40 MPH) AND STARTS A 2 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 3 AROUND THE CORNER. I HAVE TAKEN TO DEALER AND TIRE SHOP THEY SAY 4 **NOTHING WRONG.** *TR **1 Affected Product** 5 6 May 24, 2017 NHTSA ID NUMBER: 10991433 7 Components: STEERING, SUSPENSION, WHEELS **NHTSA ID Number:** 10991433 8 **Incident Date** May 21, 2017 Consumer Location BLACKFOOT, ID 9 Vehicle Identification Number 1FDWX37Y66E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 TRUCK WITHOUT WRECKING. I HAD TO STOP IN THE TRAFFIC LANE. THIS WAS AN 15 EXTREMELY DANGEROUS SITUATION. AFTER RESUMING TRAVEL, THE FRONT END WOULD SHIMMY AT ABOUT 45 MPH. I HAD TO DRIVE HOME AT 40 MPH...ROUGHLY 16 ANOTHER 75 MILES. I THINK I HAVE SEEN AN ADVISORY LETTER FROM FORD, TO OWNERS, CONCERNING THIS. THERE ARE MANY, MANY INSTANCES OF THIS 17 HAPPENING. ONE CAN FIND DOZENS OF EXAMPLES OF THIS HAPPENING IF ONE LOOKS 18 ON LINE. NEITHER FORD NOR THE LOCAL FORD DEALER SEEMS TO BE AWARE OF THE PROBLEM. WE WERE TRAVELING AT ABOUT 60 MPH AT THE TIME OF THE 19 INCIDENT. 1 Affected Product 20 21 January 16, 2014 NHTSA ID NUMBER: 10560235 22 **Components: STEERING** 23 NHTSA ID Number: 10560235 **Incident Date** November 2, 2012 24 Consumer Location THEODORE, AL Vehicle Identification Number 1FTWW33P46E**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHSO** 28 -222-Class Action Complaint

DRIVING VEHICLE WITH FIFTH WHEEL 31 FT CAMPER IN TOW VEHICLE LURCHED TO 1 THE LEFT AND ATTEMPTS TO CORRECT FOUND GREAT RESISTANCE IN STEERING 2 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 3 BECOMES ALMOST UNRESPONSIVE. I HAD THE VEHICLE CHECKED AND WAS ADVISED 4 NOTHING WAS IN NEED OF REPLACEMENT. THEN I RECEIVED A LETTER FROM FORD MOTOR CO DESCRIBING THE EXACT STEERING SITUATION THAT I AM EXPERIENCING 5 ALONG WITH RECOMMENDATIONS TO KEEP TIRES INFLATED PROPERLY, WHICH I HAVE AND CONTINUE TO HAVE CORRECT. I CONTACTED FORD TO VOICE MY 6 CONCERN AND WAS ADVISED THIS IS "JUST A NORMAL QUALITY OF A SOLID 7 FRONT AXEL 4 WHEEL DRIVE TRUCK". I USE THIS VEHICLE TO PULL A CAMPER AND WHEN THIS "SEVERE VIBRATION AND OSCILLATION" OCCURS IT CAUSES THE 8 TRUCK/TRAILER TO LURCH SO FAR AS TO CAUSE IT TO SHIFT LANES. THIS PROBLEM OCCURS AT ALL SPEEDS, EVEN HIGHWAY SPEEDS OF 70MPH. I WAS ALSO TOLD THAT 9 THE LETTER WAS ONLY A "NOTIFICATION OF THE SITUATION AND HOW TO AVOID" 10 AND NOT A RECALL. 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 11 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 12 ON BEFORE A RECALL IS ISSUED? HAVING IDENTIFIED A VEHICLE STEERING PROBLEM, 13 THAT IN MY OPINION COULD BE LIFE THREATENING, SHOULD BE SUFFICIENT CAUSE FOR A RECALL TO BE ISSUED. *TR 14

1 Affected Product

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16 February 19, 2009 **NHTSA ID NUMBER: 10259399**

Components: SUSPENSION, POWER TRAIN

NHTSA ID Number: 10259399 Incident Date February 15, 2009

Consumer Location ROCK PORT, MO

Vehicle Identification Number 1FTWW31P56E****

20 | Summary of Complaint

CRASHNo

21 || FIRENo

22 | INJURIESO

DEATHS0

23 I PURCHASED MY 2006 SUPERDUTY NEW IN JUNE 2006 WHEN THE TRUCK WAS NEW I 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

FEW TIMES ON THE INTERSTATE WHEN GOING AROUND 70 MPH IF YOU HIT ROUGH 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

FAMILY TO RIDE IN THE TRUCK ANYMORE. MY DEALER SAYS THEY DON'T SEE ANY PROBLEMS SO I HAVE NOT BEEN ABLE TO GET ANYTHING DONE TO RESOLVE THIS

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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Class Action Complaint

FORDS OVER THE PAST 8 YEARS AND I WOULD LIKE TO THINK THAT FORD WILL TAKE 1 CARE OF THIS IF THEY WANT TO KEEP ME AS A LOYAL CUSTOMER. I DON'T THINK I 2 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 3 PERMANENTLY FIX THE PROBLEM MY WIFE AND I WILL NO LONGER BUY FROM THEM. 4 1 Affected Product 5 6 January 30, 2012 NHTSA ID NUMBER: 10445958 7 **Components: STEERING** NHTSA ID Number: 10445958 8 **Incident Date** May 25, 2011 Consumer Location BOWLING GREEN, KY 9 Vehicle Identification Number 1FTWW33P46E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 BUMP JUST RIGHT OR WHEN I APPLY MEDIUM TO HARD BREAKING IT BEGINS TO 15 WOBBLE TO GET IT UNDER CONTROL I HAVE TO BREAK HARD AND COME ALMOST TO A COMPLETE STOP. I HAVE HAD IT IN THE DEALERSHIP 3 TIMES I WAS TOLD THERE 16 WAS NOTHING WRONG WITH THE FRONT END, AND WAS TOLD TO ADJUST MY AIR PRESSURE LOWER, THEY ADJUSTED IT, IT CORRECTED NOTHING. I HAVE BEGAN TO 17 JUST DRIVE AND DEAL WITH IT TILL TODAY. IT SHOOK ME INTO AN ONCOMING LANE 18 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 19 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 20 1 Affected Product 21 22 December 30, 2008 NHTSA ID NUMBER: 10253225 23 **Components: SUSPENSION** NHTSA ID Number: 10253225 24 **Incident Date June 1, 2008** Consumer Location ALPINE, CA 25 **Vehicle Identification Number N/A** 26 **Summary of Complaint CRASHNo** 27 **FIRENo INJURIES0** 28 **DEATHS0** -224-Class Action Complaint

2007 F250 SUPER DUTY SHAKES VIOLENTLY WHEN AT SPEEDS AT 60-65 AND HITS A 1 BUMP. SHAKES ONLY ON THE RIGHT SIDE. HAS BEEN HAPPENING FOR EIGHT MONTHS. 2 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 3 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 4 SCARY. *TR 5 **1 Affected Product** 6 7 April 13, 2009 NHTSA ID NUMBER: 10265146 Components: FUEL SYSTEM, DIESEL, POWER TRAIN, ENGINE AND ENGINE COOLING, 8 **SUSPENSION** 9 NHTSA ID Number: 10265146 Incident Date April 5, 2009 10 Consumer Location CADIZ, KY Vehicle Identification Number 1FTSX21P67E**** 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHS0** 14 I HAVE A FORD F250 2007 4X4 DIESEL. WENT OVER A BUMP IN THE ROAD AND THE 15 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 16 A WEEK BECAUSE I PULL EQUIPMENT ALMOST DAILY. FORD IS TRYING TO COVER UP SOMETHING AND IT NEEDS TO BE FIXED. I HAVE HAD THE TRUCK ALMOST TWO 17 YEARS, AND HAVE HAD IT BACK AT THE DEALERSHIP 29 TIMES IN 22 MONTHS. 18 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 19 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 20 **1 Affected Product** 21 22 January 27, 2009 NHTSA ID NUMBER: 10256489 23 Components: STEERING, WHEELS NHTSA ID Number: 10256489 24 **Incident Date** October 30, 2007 Consumer Location CITY OF INDUSTRY, CA 25 Vehicle Identification Number 1FTSW21P47E**** 26 **Summary of Complaint CRASHNo** 27 **FIRENo INJURIES0** 28 **DEATHS0** -225-Class Action Complaint

TL*THE CONTACT OWNS A 2007 FORD F-250 SD. THE CONTACT NOTICED THAT THE 1 STEERING COLUMN AND WHEELS VIBRATE ABNORMALLY. SPEED WAS NOT A FACTOR 2 DURING THE FAILURES. HIS CONTROL OF THE VEHICLE WAS SIGNIFICANTLY REDUCED. HE TOOK THE VEHICLE TO THE DEALER AND THEY STATED THAT THE FAILURE 3 WAS A NORMAL CHARACTERISTIC OF THE VEHICLE. HE CALLED THE MANUFACTURER AND IS WAITING FOR A RESPONSE. THE FAILURE MILEAGE WAS 300 4 AND CURRENT MILEAGE WAS 31,100. 5 **1 Affected Product** 6 7 July 21, 2008 NHTSA ID NUMBER: 10235162 **Components: SUSPENSION** 8 NHTSA ID Number: 10235162 9 **Incident Date** November 13, 2006 Consumer Location SAN DIEGO, CA 10 Vehicle Identification Number 1FTWW31Y47E**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** TL*THE CONTACT OWNS A 2007 FORD F350. WHILE DRIVING 55 MPH AND HIGHER, THE 14 FRONT END OF THE VEHICLE SHAKES VIOLENTLY AND BECOMES UNCONTROLLABLE. 15 THE DEALER COULD NOT DUPLICATE THE FAILURE. THE CURRENT MILEAGE WAS 9,670 AND FAILURE MILEAGE WAS 700. 16 **1 Affected Product** 17 18 July 29, 2010 NHTSA ID NUMBER: 10346223 **Components: STEERING** 19 NHTSA ID Number: 10346223 **Incident Date July 26, 2010** 20 **Consumer Location JESUP, IA** 21 Vehicle Identification Number 1FTSX21568E**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** I BOUGHT A 2008 FORD F-250 EXTENDED CAB TRUCK AND WHEN I GO OVER A SMALL 25 BUMP IN THE ROAD THE FRONT END SHAKES REAL BAD TO THE POINT I ALMOST LOST 26 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 27 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 28 MAKE A DIFFERENCE. THE OLD SHOCKS APPEARED TO BE IN GOOD SHAPE YET. I THEN -226-

Class Action Complaint

REPLACED THE TIRES EVEN THOUGH THEY WERE STILL GOOD AND THEY WERE WORN 1 EVENLY. STILL DID NOT FIX IT. I THEN DROPPED MY AIR PRESSURE IN THE TIRES TO 2 60PSI FRONT AND BACK TO IF IT MADE A DIFFERENCE. STILL DID NOT FIX IT. I HAD THE DEALERSHIP LOOK AT IT AND THEY SAID THEY COULD NOT FIND ANYTHING 3 WRONG WITH IT. I OWNED A 1999 F-250 AND IT NEVER HAD THIS PROBLEM. I HAD 4 165,000 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 5 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 6 THE PEOPLE AND CHILDREN THAT RIDE IN THERE VEHICLES AND THE LIVES THAT 7 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 8 SURE A DESIGN FLAW. *TR **1 Affected Product** 9 10 March 13, 2010 NHTSA ID NUMBER: 10319436 11 **Components: SUSPENSION** 12 NHTSA ID Number: 10319436 **Incident Date** March 12, 2010 13 Consumer Location RAYMOND, NH Vehicle Identification Number 1FTWX31508E**** 14 **Summary of Complaint** 15 **CRASHNo FIRENo** 16 **INJURIES0 DEATHS0** 17 2008 F-350 HAS WHAT THEY CALL THE "DEATH WOBBLE" AND HAS A CONSTANT SHAKE 18 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 19 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 20 TO THE DEALERSHIP. SOMEDAY I'M GOING TO KILL SOMEONE OR MYSELF IN THIS 21 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 IVOO 05/26/10 22 1 Affected Product **2 Associated Documents** 23 24 November 29, 2012 NHTSA ID NUMBER: 10486420 25 **Components: SUSPENSION** 26 **NHTSA ID Number:** 10486420 **Incident Date June 1, 2012** 27 Consumer Location SILT, CO Vehicle Identification Number 1FTWW31R48E**** 28 **Summary of Complaint** -227-

Class Action Complaint Case No.

1 | CRASHNo

FIRENo

- 2 | INJURIESO
- 3 | DEATHSO
- TL* THE CONTACT OWNS A 2008 FORD F-350 SUPER DUTY. THE CONTACT STATED THAT
- 4 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
- 6 TIMES. THE VEHICLE WAS TAKEN TO THE DEALER WHO TEST DROVE THE
- VEHICLE, BUT WAS UNABLE TO DUPLICATE THE FAILURE. THE CONTACT TOOK THE
- 7 VEHICLE TO A TIRE SPECIALIST WHO PERFORMED AN ALIGNMENT AND REPLACED THE
- 8 TIRES AND SHOCKS HOWEVER, THE FAILURE WAS NOT CORRECTED. THE VEHICLE CONTINUED TO SHAKE UNCONTROLLABLY WHEN DRIVING OVER A ROAD BUMP. THE
- 9 MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE
- FAILURE MILEAGE WAS 29,800 AND THE CURRENT MILEAGE WAS 30,000.
- 10 | 1 Affected Product
- 12 | February 5, 2018 NHTSA ID NUMBER: 11067094
- Components: STEERING, SUSPENSION
- 13 **NHTSA ID Number:** 11067094
- 14 | Incident Date February 3, 2018
 - Consumer Location NORTHPORT, AL
- 15 | Vehicle Identification Number 1FTWW31R78E****
- 16 Summary of Complaint
- CRASHNo
- 17 || FIRENo

11

- INJURIES0
- 18 || DEATHSO
- 19 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
- 20 | VEHICLE SPEED DOWN TO UNDER 20 MPH. THIS PROBLEM BEGAN OCCURRING
- SPORADICALLY ABOUT ONE YEAR AGO AND HAS GOTTEN CONSISTENTLY WORSE. IT IS
- 21 SO SEVER THAT I HAVE DECIDED TO PARK THE VEHICLE OUT OF A CONCERN FOR
- 22 SAFETY. I HAD THE VEHICLE INSPECTED AT THE LOCAL FORD DEALERSHIP
- APPROXIMATELY 3-4 MONTHS AGO AND THEY SAID EVERYTHING WAS FINE.
- 23 TODAY, 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
- 24 AND I KEEP THEM PROPERLY INFLATED. AFTER RESEARCHING THIS, I HAVE NOTICED
- 25 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
- 26 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.

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Class Action Complaint

1 Affected Product 1 2 September 17, 2013 NHTSA ID NUMBER: 10544035 3 Components: STEERING, SUSPENSION 4 NHTSA ID Number: 10544035 **Incident Date** September 1, 2010 5 Consumer Location NEWPORT NEWS, VA Vehicle Identification Number 1FTSW21R79E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** THE FRONT TIRES AND STEERING WHEEL SHIMMY LEFT TO RIGHT AT HIGHWAY 10 SPEEDS. IT WAS BROUGHT TOP THE DEALERSHIP FROM WHERE IT WAS PURCHASED TO BE REPAIRED. DEALERSHIP SAID THEY FOUND NO ISSUES WITH IT. IT WAS NOTICED 11 AGAIN AND BROUGHT BACK TO THE DEALERSHIP AFTER I REPLACED THE STEERING 12 STABILIZER. I WAS TOLD AT THAT POINT THE TRACK BAR BALL JOINT WAS WORN AND WAS CHARGED \$400.00 FOR THE REPAIR. THE VEHICLE IS PROGRESSIVELY GETTING 13 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 **Components: WHEELS, SUSPENSION** 19 NHTSA ID Number: 10439936 **Incident Date June 15, 2010** 20 Consumer Location COUNCIL BLUFFS, IA 21 Vehicle Identification Number 1FT7W2BT3BE**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** I HAVE EXPERIENCED A VIOLENT WOBBLE IN MY FRONT END OF THE 2011 FORD 250 25 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 I HAVE TO SLOW DOWN TO ALMOST A STOP TO STOP THE SHIMMY. I'M AT THE POINT 27 WHERE IT FEELS UNSAFE TO DRIVE. THANK YOU FOR YOUR TIME. *TR 1 Affected Product 28 -229-Class Action Complaint

1 October 23, 2014 NHTSA ID NUMBER: 10649518 2 **Components: STEERING, SUSPENSION NHTSA ID Number:** 10649518 3 Incident Date October 22, 2014 4 Consumer Location ZEBULON, NC Vehicle Identification Number 1FT7W2BT9BE**** 5 **Summary of Complaint CRASHNo** 6 **FIRENo** 7 **INJURIES0 DEATHS0** 8 MY HUSBAND WAS DRIVING THROUGH A ROAD CONSTRUCTION WORK ZONE WHEN SUDDENLY THE STEERING WHEEL STARTED SHAKING VIOLENTLY AND JUMPED OUT 9 OF HIS HANDS . HE LOST CONTROL OF THE TRUCK . THE OTHER DRIVERS WERE ABLE 10 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 11 HAVING THE SAME ISSUE. MY HUSBAND TOOK IT TO THE LOCAL DEALERSHIP WHERE THEY SAY THEY HAVE NO KNOWLEDGE OF SUCH ISSUES. THEY TOLD HIM 12 IT WAS POOR TIRE PRESSURE OR OUT OF ALIGNMENT. MY HUSBAND HAD BOTH 13 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 14 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 15 MOTOR COMPANY . *TR 16 **1 Affected Product** 17 18 May 23, 2015 NHTSA ID NUMBER: 10721166 Components: STEERING, SUSPENSION, WHEELS 19 NHTSA ID Number: 10721166 **Incident Date** October 10, 2014 20 Consumer Location REEDVILLE, VA 21 Vehicle Identification Number 1FT7X2B64BE**** **Summary of Complaint** 22 **CRASHNo FIRENo** 23 **INJURIES0** 24 **DEATHS0** WE HAVE HAD ABOUT FOUR OCCASIONS WHERE OUR TRUCK SUDDENLY BEGINS TO 25 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 26 IT WAS COMING OFF BRIDGE. HITTING A STEEL CHANNEL AT THE JUNCTION AND ONE 27 TIME A LARGE HOLE. ALL THREE TIMES IT WAS ONE WHEEL HITTING THE HOLE OR DEPRESSION BEFORE THE OTHER WHEEL HIT. WE TOOK IT TO FORD 28 **DEALERSHIP.....NO IDEAS THERE.** THEY REBALANCED THE LEFT TIRE AND NO MORE -230-

Class Action Complaint

DETERMINE ANY FAILURE WITH THE VEHICLE. THEY ALSO CHECKED THE TIRE

PRESSURE BUT THERE WAS NO PROBLEM WITH THE TIRES. THE MANUFACTURER

-231-

WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 40,000.

1 Affected Product

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Class Action Complaint

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1
2
    November 18, 2013 NHTSA ID NUMBER: 10552684
    Components: STEERING
3
    NHTSA ID Number: 10552684
4
    Incident Date October 9, 2013
    Consumer Location VALLEY STREAM, NY
5
    Vehicle Identification Number 1FT7W2B60BE****
    Summary of Complaint
6
    CRASHNo
7
    FIRENo
    INJURIES0
8
    DEATHS0
9
    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.
10
    THE CONTACT STATED THAT HE APPLIED THE BRAKES AND THE SHAKING CEASED.
    THE VEHICLE WAS TAKEN TO THE DEALER FOR INSPECTION BUT THEY COULD
11
    NOT DIAGNOSE THE CAUSE OF THE FAILURE. THE VEHICLE WAS NOT REPAIRED.
12
    THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS
    35,000.
13
    1 Affected Product
14
15
    January 15, 2014 NHTSA ID NUMBER: 10560105
    Components: STEERING
16
    NHTSA ID Number: 10560105
    Incident Date January 15, 2013
17
    Consumer Location Unknown
18
    Vehicle Identification Number 1FT7W2BT2BE****
    Summary of Complaint
19
    CRASHNo
    FIRENo
20
    INJURIES0
21
    DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE
22
    TRAVELING APPROXIMATELY 60 MPH, THE VEHICLE SHOOK VIOLENTLY. THE
23
    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
    30,000.
25
    1 Affected Product
26
27
    January 27, 2014 NHTSA ID NUMBER: 10561609
28
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10561609
                                         -232-
    Class Action Complaint
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Incident Date January 27, 2012
 1
    Consumer Location SAN ANTONIO, TX
2
    Vehicle Identification Number 1FT8W3DT2BE****
    Summary of Complaint
3
    CRASHNo
4
    FIRENo
   INJURIES0
5
    DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-350 SD. WHILE DRIVING 55 MPH, THE CONTACT
6
    STATED THAT THE VEHICLE BEGAN TO SHAKE VIOLENTLY. THE CONTACT APPLIED
7
    THE BRAKES TO SLOW THE VEHICLE DOWN AND THE SHAKING SUBSIDED. THE
    VEHICLE WAS TAKEN TO THE DEALER FOR INSPECTION AND THEY WERE UNABLE
8
    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
9
    VEHICLE WERE REPLACED AND BALANCED BUT THE FAILURE RECURRED. THE
10
    MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE
    FAILURE MILEAGE WAS 25,000. UPDATED 03/05/14*LJ THE CONSUMER STATED HE
11
    EXPERIENCED STEERING WHEEL OSCILLATION FOR THE LAST 70,000 MILES. THE
    CONSUMER HAD NUMEROUS COMPONENTS REPLACED, BUT TO NO AVAIL. THE
12
    DEALER INFROMED THE CONSUMER THE OSCILLATION WAS NORMAL.
13
    1 Affected Product
14
15
    June 7, 2015 NHTSA ID NUMBER: 10723796
    Components: STEERING
16
    NHTSA ID Number: 10723796
    Incident Date June 6, 2015
17
    Consumer Location FARIBAULT, MN
18
    Vehicle Identification Number 1FT8W3BT7BE****
    Summary of Complaint
19
    CRASHNo
    FIRENo
20
    INJURIES0
21
    DEATHS0
    I LOST STEERING IN THE TRUCK. THE STEERING WHEEL TURNED LEFT TO RIGHT AND
22
    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
23
    VERY RANDOM WHEN IT HAPPENS AND HAS HAPPENED AT INTERSTATE SPEED. THE
24
    DEALER SAYS THERE IS NOTHING WRONG AND HAVE REPLACED TIE ROD ENDS
    ALONG WITH BRAKES.
25
    1 Affected Product
26
27
    February 8, 2018 NHTSA ID NUMBER: 11071768
    Components: ENGINE, STEERING
28
    NHTSA ID Number: 11071768
                                        -233-
```

Class Action Complaint

22

23

-234-

24

25

27

28

26 August 30, 2014 NHTSA ID NUMBER: 10629639

Components: STEERING, SUSPENSION

NHTSA ID Number: 10629639 **Incident Date June 6, 2014**

Consumer Location BLUE MOUNDS, WI

Class Action Complaint

- 1 | Vehicle Identification Number 1FT7W2B61CE****
- Summary of Complaint
- 2 CRASHNo
- 3 || FIRENo
 - **INJURIES0**
- 4 | DEATHSO
- 5 AFTER HITTING PATCHED PORTION ON ROAD FRONT WHEELS BEGAN TO SHAKE 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

- 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****
 - Summary of Complaint
- 13 CRASHNo
- 14 | FIRENo
- INJURIESO
- 15 | DEATHSO
- 16 I AM EXPERIENCING WHAT THEY CALL THE "DEATH WOBBLE". AFTER HITTING A
- SERIES OF BUMPS / POT HOLES, THE FRONT WHEELS START TO SHIMMY AND SHAKE
- 17 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
- 19 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
- 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 THE VEHICLE. I STARTED IN THE RIGHT LANE, BUT WOUND UP IN THE MEDIAN, AND
- 23 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
- 25 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
- 27 TO DO MORE RESEARCH. BUT IT SEEMS PRETTY INCREDIBLE TO ME, THAT WITH THIS
- 28 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

LEAST 12 DEATHS TO MAKE IT WORTH SOMEONE'S ATTENTION TO UNDERSTAND THAT 1 THIS IS A SEVERE SAFETY PROBLEM, NOT ONLY TO THE DRIVER AND HIS OCCUPANTS, 2 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 3 IGNORED ?? *TR 4 1 Affected Product 5 August 14, 2016 NHTSA ID NUMBER: 10895820 6 **Components: STEERING, SUSPENSION** 7 NHTSA ID Number: 10895820 **Incident Date** August 27, 2015 8 Consumer Location LAKESIDE, CA Vehicle Identification Number 1FT8W3BT9CE**** 9 **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** DEATH WOBBLE: DRIVING OVER A ROUGH PATCH OF FREEWAY OR OVER AN 13 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 DEALER TOLD ME IT WAS NORMAL. MY TRUCK IS NOW OUT OF WARRANTY, AND 17 THIS HAPPENS REGULARLY. I KNOW A SPOT THAT THE OSCILLATION WILL OCCUR, 18 AND DRIVE TO AVOID IT, HOWEVER IT HAPPENS REGULARLY WITHOUT WARNING. 1 Affected Product 19 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** Vehicle Identification Number 1FT8W3BT4CE**** 24 **Summary of Complaint CRASHNo** 25 **FIRENo** 26 **INJURIES0 DEATHSO** 27 ON I-81 THRU HARRISONBURG. VA CROSSING A BRIDGE WITH SEVERAL BUMPS IN IT. THE STEERING WENT INTO UNCONTROLLED VIBRATION LIKE IT WAS COMING APART. I 28 HAD TO SLOW DOWN TO 20 MPH TO GET IT TO STOP. 20 MPH AT NIGHT ON AN -236-

Class Action Complaint

INTERSTATE IS HARDLY SAFE. ANOTHER TIME IT OCCURRED WHILE ENTERING AN ON-1 RAMP TO AN INTERSTATE. AGAIN, I HAD TO SLOW DOWN TO 20 MPH TO GET IT TO 2 STOP. THE GUY BEHIND ME, ALSO TRYING TO MERGE, ALMOST HIT ME. THE VIBRATIONS HAVE OCCURRED SINCE THE TRUCK WAS ALMOST NEW. THE FORD 3 **DEALER SAYS THIS IS NORMAL.** I THINK IT REPRESENTS AN ACCIDENT WAITING TO 4 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 5 SHAKING. UNDER THOSE CONDITIONS, A MECHANICAL RESONANCE WITH POSITIVE FEEDBACK SEEMS TO CREATE THE UNCONTROLLABLE SHUDDER. *TR 6 **1 Affected Product** 7 8 September 22, 2017 NHTSA ID NUMBER: 11025099 Components: ELECTRONIC STABILITY CONTROL, STEERING, SUSPENSION 9 NHTSA ID Number: 11025099 10 **Incident Date** September 21, 2017 Consumer Location MICANOPY, FL 11 Vehicle Identification Number 1FT8W3BT7DE**** 12 **Summary of Complaint CRASHNo** 13 **FIRENo INJURIES0** 14 **DEATHSO** 15 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 16 OSCILLATE TO THE POINT OF INDUCING A VIOLENTLY STEERING WHEEL SHIMMY AND AN UNCONTROLLABLE BOUNCE OF THE FRONT WHEELS. THIS HAS HAPPENED TWICE 17 IN THE PAST 2-MONTHS WHEN I HAVE TAKEN THE TRUCK ON THE HIGHWAY. THE 18 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 19 OUICKLY 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 20 THE VEHICLE BEING VERY DIFFICULT TO CONTROL. ONLY AFTER SLOWING TO 21 APPROXIMATELY 30 MPH DOES THE OSCILLATION STOP. UPON RESEARCHING THIS PROBLEM. I AM PERPLEXED WHY FORD OR THE NTHSA HAVE NOT STEPPED FORWARD 22 TO ADDRESS THIS ISSUE, SOMEONE WILL BE HURT OR KILLED IF A SOLUTION IS NOT FOUND. WE HAVE TAKEN THE TRUCK NOW TO TWO DIFFERENT CERTIFIED FORD 23 DEALERSHIPS AFTER EACH INCIDENT EACH TIME WE WERE TOLD THERE WAS 24 NOTHING WRONG WITH THE VEHICLE AND THIS SOMETIMES HAPPENS WITH THESE TRUCKS. THIS CAN'T SERIOUSLY BE TRUE? AFTER DOING RESEARCH I'VE 25 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 26 SELECT FEW CONSUMERS BUT FOR SO MANY. 27

28

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Class Action Complaint Case No.

1 Affected Product

```
1
   October 20, 2014 NHTSA ID NUMBER: 10648730
    Components: ELECTRONIC STABILITY CONTROL, UNKNOWN OR OTHER,
2
    SUSPENSION
   NHTSA ID Number: 10648730
3
   Incident Date October 15, 2014
4
    Consumer Location SANBORNTON, NH
    Vehicle Identification Number 1FT7X3B66FE****
5
   Summary of Complaint
    CRASHNo
6
   FIRENo
7
   INJURIES0
   DEATHS0
8
   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
9
    WASHBOARD TYPE BUMP. IMMEDIATELY, THE FRONT OF THE VEHICLE VIBRATED
10
    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
11
    TRACTION ALLOWING THE REAR OF THE VEHICLE TO SWING VIOLENTLY TO THE
    RIGHT. I IMMEDIATELY WENT TO THE FORD DEALERSHIP WHERE I PURCHASED
12
    THE VEHICLE LESS THAN 10 DAYS AGO. SERVICE BROUGHT IT IN AND I EXPLAINED
13
    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.
14
    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
15
    TALKING ABOUT." THE DEALERSHIP TOOK THE TRUCK IN FOR INSPECTION.
16
    NOTHING WAS FOUND MECHANICALLY. DURING THE INSPECTION, THE REAR TIRE
    PRESSURE WAS LOWERED TO 65 PSI INSTEAD OF THE RECOMENDED 80 PSI THAT WAS
17
   SET PRIOR FROM THE MANUFACTURER. THE TIRE PRESSURE MONITOR SYSTEM WAS
   RE-CALIBRATED TO SHOW THE LOWERED TIRE PRESSURE. FRONT PRESSURES WERE
18
    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
    WAS ADVISED IT IS A "NORMAL CONDITION" TO ALMOST ROLL OVER A PICKUP WITH
20
    SUCH A STIFF SUSPENSION WITHOUT A LOAD IN THE BACK CONSTANTLY. FORD IS
21
   UNAWARE OF ISSUE. 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
    WASHBOARD, THIS TIME GOING STRAIGHT AND 25 MILES PER HOUR. THE SAME
23
    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
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Class Action Complaint

Incident Date July 25, 2016

Case No.

28

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

Class Action Complaint

Consumer Location INDIANAPOLIS, IN 1 Vehicle Identification Number 1FTWW3DR4AE**** 2 **Summary of Complaint CRASHNo** 3 **FIRENo** 4 **INJURIES0 DEATHSO** 5 WHILE DRIVING ON THE INTERSTATE APPROX 60 MPH HITTING A BUMP THE FRONT END SHAKES VIOLENTLY UNTIL THE TRUCK SLOWS DOWN TO RECOVER. HAD IT IN 6 THE DEALERSHIP TWICE AND THEY SAID NOTHING IS WRONG. 7 1 Affected Product 8 9 October 16, 2018 NHTSA ID NUMBER: 11140682 Components: SERVICE BRAKES, ENGINE, SUSPENSION 10 NHTSA ID Number: 11140682 **Incident Date** November 1, 2017 11 Consumer Location NEW WAVERLY, TX Vehicle Identification Number 1FT8X3DT1HE**** 12 **Summary of Complaint** 13 **CRASHNo FIRENo** 14 **INJURIES0** 15 **DEATHSO** 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 OUIT. THE DEALER COULD NOT DUPLICATE AND SAID IT WAS TIRES OUT OF BALANCE, THE 17 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 BRADED LINE THAT GOES FROM MASTER CYLINDER TO ABS MODULE RUPTURED AND 19 LEFT ME WITH NO BRAKES . ALL OF THIS OVER A COURSE OF ABOUT 89K MILES 1 Affected Product 20 21 December 5, 2018 NHTSA ID NUMBER: 11156425 22 **Components: STEERING, SUSPENSION** 23 NHTSA ID Number: 11156425 **Incident Date** December 1, 2018 24 Consumer Location SAN RAMON, CA Vehicle Identification Number 1FT8W3DT2HE**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHSO** 28 -240-

Class Action Complaint

2017 F350 SUPERDUTY DRW, 27000 MILES. WHILE ON THE FREEWAY AT 65 MPH, THE 1 STEERING WENT INTO AN UNCONTROLLABLE VIBRATION (DEATH WOBBLE). THE ONLY 2 SOLUTION WAS TO REDUCE SPEED TO APPROXIMATELY 10 MPH. CONTACTED THE DEALER AND FORD'S CUSTOMER SERVICE, AND WAS INFORMED THAT IT MUST BE 3 WITNESSED BY AN OFFICIAL SERVICE TECHNICIAN BEFORE ANY ASSISTANCE 4 **COULD BE RENDERED.** 1 Affected Product 5 6 2. NHTSA Consumer Complainants Who Were Told by Defendant Ford's Authorized 7 Dealers that There Was Nothing that Could be Done to Assist Them or to Correct 8 the Death Wobble Problem 9 50. The following are the consumer complaints submitted to NHTSA where the Complainant 10 States that Defendant Ford's authorized dealers stated that there was nothing they could or would do to 11 address the Death Wobble issue. 12 February 28, 2007 NHTSA ID NUMBER: 10183787 13 **Components: SUSPENSION** NHTSA ID Number: 10183787 14 **Incident Date** February 27, 2007 Consumer Location OPELOUSAS, LA 15 Vehicle Identification Number 1FTSW21P35E**** 16 **Summary of Complaint CRASHNo** 17 **FIRENo INJURIES0** 18 **DEATHSO** 19 FRONT END WOBBLES SHAKES AND SLIDES ESPECIALLY IN A ROUGH CURVE AND DANGEROUS AND COULD CAUSE AN ACCIDENT. **DEALER NAME IS BORDELON FORD** 20 IN OPELOUSAS, LA. AND ADVISED COULD NOT DO ANYTHING ELSE TO CORRECT 21 THE DEFECT. *NM 1 Affected Product 22 23 July 16, 2007 NHTSA ID NUMBER: 10196519 24 **Components: SUSPENSION** NHTSA ID Number: 10196519 25 **Incident Date** July 7, 2007 Consumer Location LA PLATA, MD 26 Vehicle Identification Number 1FTSW21525E**** 27 **Summary of Complaint CRASHNo** 28 **FIRENo** -241-Class Action Complaint

INJURIES0 1 **DEATHS0** 2 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 3 POTHOLES, PATCHES, EXPANSION JOINTS, RAILROAD TRACKS, ETC. AT HIGHWAY 4 SPEEDS. SLOWER SPEEDS ARE JUST ANNOYING BUT AT HIGHER SPEEDS (60 AND UP) THE SHAKES BECOME CONVULSIONS AND THE TRUCK LITERALLY BOUNCES AND 5 SHAKES UNCONTROLLABLY. IT TAKES SLAMMING ON THE BRAKES AND GETTING BELOW 40MPH TO MAKE IT STOP. I TOOK THE TRUCK INTO THE DEALER LAST WEEK 6 (09JULY07) TO HAVE IT LOOKED AT. AFTER BEING IN THERE FOR A DAY AND A 7 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 8 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 9 VOICE TO THE MIX. I AM SOMEWHAT APPREHENSIVE ABOUT DRIVING MY TRUCK BUT 10 RIGHT NOW AM NOT FINANCIALLY ABLE TO TRADE IT IN ON SOMETHING ELSE. *TR **1 Affected Product** 11 12 August 7, 2007 NHTSA ID NUMBER: 10198762 13 **Components: SUSPENSION NHTSA ID Number:** 10198762 14 **Incident Date** April 1, 2007 15 Consumer Location HIGHLANDS RANCH, CO Vehicle Identification Number 1FTCX21575E**** 16 **Summary of Complaint CRASHNo** 17 **FIRENo** 18 **INJURIES0 DEATHSO** 19 TL*THE CONTACT OWNS A 2005 FORD F250 SUPER DUTY. HE STATED THAT WHILE DRIVING HIGHWAY SPEEDS THE VEHICLE WOULD BOUNCE AND SHIMMY. THE 20 DEALER STATED THAT THEY HAVE DONE ALL THAT THEY COULD DO. THE FAILURE 21 MILEAGE WAS 18,000 AND THE CURRENT MILEAGE WAS 22,000. THE VIN NUMBER APPEARED TO BE INCORRECT. 22 1 Affected Product 23 24 March 26, 2008 NHTSA ID NUMBER: 10222348 **Components: SUSPENSION** 25 NHTSA ID Number: 10222348 26 **Incident Date June 6, 2007** Consumer Location WILMINGTON, DE 27 Vehicle Identification Number 1FTSW21535E**** **Summary of Complaint** 28 **CRASHNo** -242-Class Action Complaint

```
FIRENo
 1
   INJURIES0
2
   DEATHS0
   2005 F-250 HAS DANGEROUS SHAKE IN FRONT END OF VEHICLE, TO THE POINT OF
3
   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
   FATALITIES. I TOOK TRUCK TO DEALER, TECH STATED THEY KNEW ABOUT THE
6
    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.
    THREE TIE RODS ARE BAD AND THE STABILIZER SHOCKS ARE BAD. HE STATED THIS IS
9
   BECAUSE THE FRONT END IS SHAKING SO BAD IT IS WEARING OUT THE RODS/SHOCKS.
10
    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
11
   FIX THIS ISSUE? *TR
    1 Affected Product
12
13
    May 27, 2009 NHTSA ID NUMBER: 10270117
14
    Components: SUSPENSION
15
   NHTSA ID Number: 10270117
   Incident Date May 10, 2009
16
    Consumer Location RED BLUFF, CA
    Vehicle Identification Number 1FTSW21Y75E****
17
    Summary of Complaint
18
   CRASHNo
   FIRENo
19
   INJURIES0
20
   DEATHSO
    UNPREDICTABLE AND UNCONTROLLABLE SEVERE FRONT END VIBRATION AND
21
   OSCILLATION, CAUSING LOSS OF CONTROL OF VEHICLE. OCCURS RANDOMLY AND
    WITHOUT WARNING, AT FREEWAY SPEEDS. HAS RESULTED IN RUNNING ONTO THE
22
    SHOULDER OF THE ROADWAY AND SEVERAL NEAR COLLISIONS WITH OTHER
    VEHICLES. VEHICLE HAS BEEN INSPECTED AND REPAIRS ATTEMPTED ON SEVERAL
23
   OCCASIONS. DEALERSHIP ADVISES THAT THIS IS INHERENT TO YEAR, MAKE AND
24
    MODEL OF VEHICLE; AND CANNOT REPAIR THE PROBLEM. *TR
    1 Affected Product
25
26
    January 11, 2008 NHTSA ID NUMBER: 10215018
27
    Components: STEERING
    NHTSA ID Number: 10215018
28
    Incident Date April 1, 2005
```

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Class Action Complaint

25

26

Consumer Location FRANKLIN. TN

Vehicle Identification Number 1FTWW31P35E****

Summary of Complaint

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Class Action Complaint

Case No.

28

```
CRASHNo
 1
    FIRENo
 2
    INJURIES0
    DEATHSO
 3
    OCCASIONALLY, AT INTERSTATE SPEEDS ONLY (65 - 75 MPH), FRONT END SHAKES
 4
    VIOLENTLY WHEN CROSSING OVER A SMALL CHANGE IN SURFACE ELEVATION. (FOR
    EXAMPLE: TRANSITION FROM ROAD SURFACE TO BRIDGE SURFACE) IT IS NOT
 5
    PREDICTABLE. VEHICLE STEERING IS COMPROMISED AND THE ONLY WAY TO REGAIN
    PROPER CONTROL IS TO ALLOW THE TRUCK TO SLOW TO APPROXIMATELY 50 MPH
 6
    WHEN VIOLENT SHAKING WILL SUBSIDE. VEHICLE HAS BEEN INSPECTED BY ONE
 7
    INDEPENDENT SHOP AND ONE FORD DEALERSHIP (WHERE VEHICLE WAS
    PURCHASED). NEITHER COULD IDENTIFY THE SOURCE OF THE PROBLEM. TRUCK IS
 8
    STOCK WITH NO MODIFICATIONS. MOST RECENT EVENTS OCCURRED TWO
    CONSECUTIVE DAYS TRAVELING INTERSTATE 65 BETWEEN NASHVILLE AND
 9
    SOUTHERN KENTUCKY. TWO DIFFERENT LOCATIONS, ONE NORTHBOUND AND ONE
10
    SOUTHBOUND. *TR
    1 Affected Product
11
12
    January 5, 2007 NHTSA ID NUMBER: 10177891
13
    Components: STEERING
    NHTSA ID Number: 10177891
14
    Incident Date January 4, 2007
15
    Consumer Location GLEN BURNIE, MD
    Vehicle Identification Number 1FTWW33P15E****
16
    Summary of Complaint
    CRASHNo
17
    FIRENo
18
    INJURIES0
    DEATHSO
19
    TL* - WHEN CONTACTWAS DRIVING AND GOING OVER A SERIES OF SMALL BUMPS
20
    LOST CONTROL OF THE STEERING WHEEL WHICH WENT FROM RIGHT TO LEFT
    QUICKLY TO THE POINT OF BEING ALMOST UNCONTROLLABLE. IN ORDER FOR
21
    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
22
    THE VEHICLE TO THE DEALERSHIP, AND THEY STATED THAT THEY NOTICED THE
    SAME INCIDENT AS WELL ON A TEST DRIVE OF THE VEHICLE, BUT THEY COULD
23
    NOT DO ANYTHING ABOUT THE INCIDENT BECAUSE THE MANUFACTURER HASN'T
24
    GIVING THE DEALERSHIP ANY ADVISE ON HOW TO FIX THE FAILURE.*AK
    1 Affected Product
25
26
    November 15, 2008 NHTSA ID NUMBER: 10248890
27
    Components: SUSPENSION, EOUIPMENT
    NHTSA ID Number: 10248890
28
    Incident Date July 4, 2005
                                       -245-
```

Case No.

Class Action Complaint

```
Consumer Location EL CAJON, CA
 1
    Vehicle Identification Number 1FTWW33P45E****
2
    Summary of Complaint
   CRASHNo
3
   FIRENo
4
   INJURIES0
   DEATHSO
5
   ON JULY 4, 2005, I PURCHASED A 2005 FORD F350 SUPER DUTY LARIAT WITH LONG BED
   AND DUAL WHEELS AND 4WD AT EL CAJON FORD. FROM THE BEGINNING, THE TRUCK
6
   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
   DIAGNOSTICS, DOWNEY FORD INSTALLED A "DAMPENER" ON THE FRONT END. IT
   MADE THE PROBLEM BETTER, BUT IT DID NOT COMPLETELY CURE THE DEFECT. I
9
   EVENTUALLY BOUGHT A LANCE CAMPER, WHICH WAS ON THE TRUCK FOR OVER A
10
    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.
11
   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
12
    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. I
    REPORTED THIS VIBRATION PROBLEM EVERY TIME I WENT TO THE DEALER FOR
14
    SERVICE. THEY ALWAYS SAID THEY DID ALL THEY COULD WITH THE DAMPENER.
   I TOOK THE TRUCK TO EL CAJON FORD ABOUT 3-4 WEEKS AGO. NOW THAT IT IS OUT OF
15
    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
    DOWNEY PUT ON A DAMPER THAT WAS TOO SMALL FOR MY TRUCK. I DEMANDED
17
    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
18
    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
    August 30, 2011 NHTSA ID NUMBER: 10422634
23
    Components: STEERING
24
    NHTSA ID Number: 10422634
   Incident Date May 28, 2011
25
    Consumer Location SHIPPENSBURG, PA
    Vehicle Identification Number 1FTWW31PX5E****
26
    Summary of Complaint
27
    CRASHNo
   FIRENo
28
    INJURIES0
                                        -246-
```

Class Action Complaint

1 **DEATHSO** TL* THE CONTACT OWNS A 2005 FORD F350. THE CONTACT STATED THAT THE 2 STEERING WHEEL WOULD SHAKE VIOLENTLY. THE VEHICLE WAS TAKEN TO A MECHANIC WHO AS UNABLE TO DIAGNOSE THE FAILURE. THE VEHICLE WAS THEN 3 TAKEN TO THE DEALER WHO ALSO COULD NOT DIAGNOSE THE FAILURE. THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 24,000. 4 **1 Affected Product** 5 6 March 17, 2015 NHTSA ID NUMBER: 10694792 7 **Components: STEERING NHTSA ID Number:** 10694792 8 **Incident Date** March 6, 2015 9 Consumer Location PONTIAC, MI Vehicle Identification Number 1FTWX31P05E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 VIOLENTLY BACK AND FORTH FOR SEVERAL SECONDS (4 TO 5 SECONDS) OR UNTIL I 15 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 16 LIKE NEW, AND THE FRONT SUSPENSION COMPONENTS HAVE BEEN CHECKED AND DETERMINED TO BE IN GOOD USABLE CONDITION. SEARCHING THE WEB FOR 17 POSSIBLE CAUSES OR FIXES OF THIS ISSUE, I HAVE FOUND THAT MANY OTHER 18 PEOPLE ALSO HAVE THIS SAME PROBLEM, WITH LITTLE TO NO HELP COMING FROM SERVICE REPAIRS AT A DEALERSHIP. *TR 19 1 Affected Product 20 21 June 1, 2009 NHTSA ID NUMBER: 10272506 **Components: SUSPENSION** 22 NHTSA ID Number: 10272506 23 **Incident Date** May 26, 2009 Consumer Location HINESTON, LA 24 Vehicle Identification Number 1FTSW21536E**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHSO** TL*THE CONTACT OWNS A 2006 FORD F-250. WHILE DRIVING 65 MPH, THE VEHICLE 28 WOULD SHIMMY WHEN IT DROVE OVER A BUMP IN THE ROAD. THE DEALER COULD -247-Class Action Complaint

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

POSSIBILITY OF LOSING CONTROL OF THE VEHICLE WHEN THE FAILURE OCCURRED. 1 THE FAILURE MILEAGE WAS 62,000. 2 1 Affected Product 3 4 February 20, 2014 NHTSA ID NUMBER: 10565061 Components: WHEELS, SUSPENSION, STEERING 5 NHTSA ID Number: 10565061 **Incident Date** February 19, 2014 6 Consumer Location JOHNS CREEK, GA 7 Vehicle Identification Number N/A **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHSO** WHILE DRIVING MY 2006 FORD F250 FX4, AT SPEEDS BETWEEN 45-65 MPH, A SLIGHT 11 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 ALMOST LOST CONTROL ON THE HIGHWAY AND CAME WITHIN INCHES OF HITTING 13 ANOTHER VEHICLE. WHEN IT STARTS THERE IS NO STOPPING IT, AS THE STEERING WHEEL JERKS VIOLENTLY. FORD HAS SENT A LETTER OUT THAT SAY INFLATE YOUR 14 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 ON THE HIGHWAY. THE DEALERS AND FORD SAY THERE IS NOTHING THEY WILL 16 DO. THIS ISSUE IS EXTREMELY DANGEROUS DUE TO FORDS ENGINEERING MISHAP.MY TIRES ARE STOCK, ROTATED, BALANCED, AND ALIGNED, THIS HAPPENS AT LEAST 17 ONCE EVERY OTHER WEEK 2005-2013 F250,350 OWNERS REPORT THE SAME ISSUE. 18 GOOGLE: FORD DEATH WOBBLE, AND WATCH THE F250 AT CRUISING SPEED. *TR 1 Affected Product 19 20 April 15, 2009 NHTSA ID NUMBER: 10265460 21 **Components: STEERING** NHTSA ID Number: 10265460 22 **Incident Date** January 15, 2006 23 Consumer Location Unknown Vehicle Identification Number 1FTNF21506E**** 24 **Summary of Complaint CRASHNo** 25 **FIRENo** 26 **INJURIES0 DEATHSO** 27 THE SHIMMY ISSUE ON MY 2006 FORD 250 PICK UP HAS NEVER BEEN RESOLVED. I SPENT APPROX 6 MONTHS WORKING WITH THE DEALERSHIP TO TRY TO RESOLVE 28 THE ISSUE. THEY EVENTUALLY TOLD ME THEY HAVE DONE EVERYTHING THAT -249-

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FORD TOLD THEM TO DO. THIS VERY DANGEROUS PROBLEM STILL EXISTS. I 1 RECEIVED A LETTER FROM FORD THAT THE PROBLEM WAS RELATED TO TIRE 2 PRESSURE. THAT IS ABSOLUTELY NONSENSE. AFTER THE SECOND SET OF FRONT TIRES BEFORE 10000 MILES THEY STARTED TO CUP SEVERELY AFTER 1000 MILES. I TOOK IT 3 BACK AND THEY PUT NEW TIRES ON ALL THE WAY AROUND. AND THEN I WAS TOLD THERE WAS NOTHING ELSE THAT COULD BE DONE. THE SHIMMY IS SO 4 SEVERE AT TIMES IT WILL ACTUALLY SHIMMY ACROSS THE CENTER LINE. *TR 5 **1 Affected Product** 6 7 April 7, 2014 NHTSA ID NUMBER: 10577858 **Components: STEERING** 8 NHTSA ID Number: 10577858 9 **Incident Date** May 2, 2011 Consumer Location OREFIELD, PA 10 Vehicle Identification Number 1FTSX21536E**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** TL* THE CONTACT OWNS A 2006 FORD F250. THE CONTACT STATED THAT THERE WAS 14 AN EXTREME VIBRATION IN THE STEERING WHEEL. THE CONTACT DROVE OVER A 15 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 16 OCCASIONS. THE VEHICLE SHOOK VIOLENTLY AND THE STEERING CONTINUED TO BE UNSTABLE. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHO WAS 17 UNABLE TO DIAGNOSE THE FAILURE. THE CONTACT CONTINUED TO EXPERIENCE 18 THE STEERING FAILURE WHICH CAUSED THE VEHICLE TO DRIVE ROUGH. THE VEHICLE WAS TAKEN BACK TO AN AUTHORIZED DEALER WHO WAS UNABLE TO 19 REPLICATE THE FAILURE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 50000. 20 **1 Affected Product** 21 22 February 14, 2008 NHTSA ID NUMBER: 10218089 23 **Components: SUSPENSION** NHTSA ID Number: 10218089 24 **Incident Date** February 13, 2008 **Consumer Location PRIOR LAKE, MN** 25 Vehicle Identification Number 1FTSW21596E**** 26 **Summary of Complaint CRASHNo** 27 **FIRENo INJURIES0** 28 **DEATHS0** -250-Class Action Complaint

1 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 2 MILES PER HOUR OR UNDER. THE FRONT END WILL SHAKE VIOLENTLY AND UNCONTROLLABLY WHEN A BUMP IS HIT. I HAVE HAD IT IN TO FORD DEALERSHIPS 3 7+ TIMES FOR THIS AND THEY WILL NOT FIX OR REPLACE THE FAULTY PARTS. I 4 HAVE STARTED A WEB LOG ON AOL REGARDING THIS AND AM ATTACHING THE LINK. HTTP://WWW.TOPIX.NET/FORUM/AUTOS/FORD-F-250-SUPER-5 DUTY/T0SGDCTMOBHE5JER1 THERE ARE OVER 170 SIMILAR COMPLAINTS REGARDING THE SAME PROBLEM. FORD DENIES THE PROBLEM EXISTS. IT WILL KILL SOMEONE 6 SOON, IT HAS ALMOST CASED 4 ACCIDENTS WITH MY TRUCK. *TR 7 1 Affected Product 8 9 June 6, 2008 NHTSA ID NUMBER: 10230092 **Components: SUSPENSION** 10 NHTSA ID Number: 10230092 **Incident Date** May 19, 2008 11 Consumer Location COLLEGEVILLE, PA 12 Vehicle Identification Number 1FTSX21596E**** **Summary of Complaint** 13 **CRASHNo FIRENo** 14 **INJURIES0** 15 **DEATHSO** SINCE NEW THE TRUCK HAS EXPERIENCED VIOLENT AND UNCONTROLLABLE FRONT 16 SUSPENSION SHAKING/BOUNCING/WOBBLING AFTER HITTING A SHARP BUMP AT HIGHWAY SPEEDS. INITIALLY, THE SHAKING WOULD ONLY LAST APPROXIMATELY 3 17 SECONDS, BUT RECENTLY THE SHAKING WAS SO SEVERE THAT I HAD TO SLOW THE 18 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 19 IMMEDIATELY INSPECTED THE FRONT SUSPENSION AT THE NEXT EXIT. NOTHING OBVIOUSLY BROKEN WAS EVIDENT. I SEARCHED THE INTERNET AND DISCOVERED 20 THAT THIS IS A COMMON AND DANGEROUS PROBLEM WITH THESE TRUCKS. I 21 DROPPED THE TRUCK OFF AT THE DEALER. THEY ACKNOWLEDGED THEIR AWARENESS OF THE PROBLEM, BUT CLAIMED THEY WERE UNABLE TO DUPLICATE 22 IT DURING THEIR ROAD TEST. THIS IS NOT SURPRISING, AS IT TYPICALLY ONLY OCCURS WHEN YOU HIT A SHARP BUMP OR SERIES OF BUMPS AT HIGHWAY SPEEDS. 23 THEY PERFORMED SOME OF THE REPAIRS/ADJUSTMENTS SPECIFIED BY FORD'S TSB 07-24 10-10, BUT THE PROBLEM PERSISTS. THERE IS A SERIOUS AND DANGEROUS PROBLEM WITH A LARGE POPULATION OF FORD TRUCKS THAT MUST BE ADDRESSED BY FORD 25 AT THIS POINT, I HOPE THAT NHTSA CAN CONVINCE FORD TO CORRECT THE PROBLEM BEFORE SOMEONE IS NEEDLESSLY KILLED. *TR 26 1 Affected Product 27

June 23, 2008 **NHTSA ID NUMBER: 10231992**

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Class Action Complaint

Case No.

28

Components: SUSPENSION, STEERING 1 NHTSA ID Number: 10231992 2 **Incident Date** October 10, 2006 Consumer Location VICTORVILLE, CA 3 Vehicle Identification Number 1FTSW21P66E**** 4 **Summary of Complaint CRASHNo** 5 **FIRENo INJURIES0** 6 **DEATHS0** 7 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 8 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 9 TO SLOW DOWN ALMOST TO A STOP FOR THE FRONT END TO STOP SHAKING OR IT 10 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 11 (SUNLAND FORD) IN VICTORVILLE DOESN'T KNOW THE FIX. THEY TOLD ME IT WAS MY STEERING DAMPENER. NOPE!! PEOPLE ARE GOING TO THEIR DEALERSHIPS 12 MULTIPLE TIMES. I PAID WELL OVER \$30,000 FOR MY TRUCK AND THIS IS VERY 13 UNACCEPTABLE. THANKS FOR YOUR TIME AND ATTENTION TO THIS MATTER. *TR 1 Affected Product 14 15 July 29, 2008 NHTSA ID NUMBER: 10236342 16 Components: STEERING, SUSPENSION NHTSA ID Number: 10236342 17 **Incident Date June 19, 2008** 18 Consumer Location DRUMS, PA Vehicle Identification Number 1FTSX21506E**** 19 **Summary of Complaint CRASHNo** 20 **FIRENo** 21 **INJURIES0 DEATHSO** 22 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 23 HOUR THE STEERING WHEEL IS OSCILLATING SO BADLY I HAVE TO SLAM ON THE 24 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 25 ALONG THE ROADWAY. THE DEALERSHIP HAS NO CLUE WHAT IS THE PROBLEM, I SPENT OVER 37000 FOR THIS TRUCK AND NOW WHAT. I FEEL UNSAFE IN IT AND IT IS 26 JUST A MATTER OF TIME BEFORE THE THING BREAKS THE WAY IT IS SHAKING. IT WILL 27 PROBABLE TAKE ME WRECKING TO GET IT FIXED. *TR 1 Affected Product 28

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Class Action Complaint

```
1
    July 21, 2009 NHTSA ID NUMBER: 10277579
2
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10277579
3
    Incident Date July 17, 2009
4
    Consumer Location CHESAPEAKE, VA
    Vehicle Identification Number 1FTSW21566E****
5
    Summary of Complaint
    CRASHNo
6
    FIRENo
7
    INJURIES0
    DEATHS0
8
    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
9
    VEHICLE SHOOK SO VIOLENTLY IT WAS HARD TO MAINTAIN CONTROL AND BRING IT
10
    TO A STOP. AFTER THIS INCIDENT IT ALSO OCCURRED THROUGHOUT THE REMAINDER
    OF THE TRIP. APPARENTLY THIS HAS HAPPENED TO OTHER DRIVERS OF THIS
11
    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
13
14
    April 2, 2010 NHTSA ID NUMBER: 10323451
15
    Components: SERVICE BRAKES, HYDRAULIC, SUSPENSION
    NHTSA ID Number: 10323451
16
    Incident Date June 1, 2008
    Consumer Location MIAMI, FL
17
    Vehicle Identification Number 1FTSW21PX6E****
18
    Summary of Complaint
    CRASHNo
19
    FIRENo
20
    INJURIES0
    DEATHSO
21
    TL* THE CONTACT OWNS A 2006 FORD F-250 SUPERDUTY. WHILE DRIVING AT
    APPROXIMATELY 50 MPH ON AN UNEVEN ROAD. THE STEERING WHEEL BEGAN
22
    SHAKING. THE CONTACT WAS ALSO UNABLE TO SLOW THE VEHICLE DOWN SINCE
    WHEN THE BRAKE PEDAL WAS DEPRESSED, IT WOULD RELEASE. THE VEHICLE WAS
23
    TAKEN TO AN AUTHORIZED DEALERSHIP BUT NO REPAIRS WERE PERFORMED
24
    WHEN THE COMPLAINT WAS FILED. THE FAILURE MILEAGE WAS APPROXIMATELY
    38,000. THE CURRENT MILEAGE WAS APPROXIMATELY 97,000.
25
    1 Affected Product
26
27
    February 11, 2013 NHTSA ID NUMBER: 10497697
    Components: STEERING, SUSPENSION
28
    NHTSA ID Number: 10497697
                                         -253-
    Class Action Complaint
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Components: STEERING
NHTSA ID Number: 10445440
Incident Date May 2, 2011
Consumer Location Unknown

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Class Action Complaint

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28

```
1
    Vehicle Identification Number 1FTSX21516E****
    Summary of Complaint
2
    CRASHNo
    FIRENo
3
   INJURIES0
4
    DEATHS0
    TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT STATED THAT THE
5
    VEHICLE WOULD VIOLENTLY WOBBLE WHILE DRIVING AT HIGHWAYS SPEEDS. THE
    DEALER ATTEMPTED TO REPAIR THE VEHICLE, BUT THE FAILURE RECURRED. THE
6
    MANUFACTURER WAS NOTIFIED, BUT DENIED ANY ASSISTANCE WITH REPAIRS.
7
    THE FAILURE MILEAGE WAS 37,000 AND THE CURRENT MILEAGE WAS 47,600.
    1 Affected Product
8
9
    December 31, 2013 NHTSA ID NUMBER: 10558024
10
    Components: STEERING
    NHTSA ID Number: 10558024
11
    Incident Date July 19, 2007
12
    Consumer Location IMPERIAL, CA
    Vehicle Identification Number 1FTSW21P86E****
13
    Summary of Complaint
    CRASHNo
14
    FIRENo
15
    INJURIES0
    DEATHS0
16
    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
17
    WOULD SHAKE VERY VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER BUT
18
    THEY WERE UNABLE DIAGNOSE THE FAILURE OR REPAIR THE PROBLEM.
    1 Affected Product
19
20
    July 14, 2011 NHTSA ID NUMBER: 10412372
21
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 10412372
22
    Incident Date July 14, 2011
    Consumer Location PORT ORANGE, FL
23
    Vehicle Identification Number N/A
24
    Summary of Complaint
    CRASHNo
25
    FIRENo
26
    INJURIES0
    DEATHSO
27
    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
28
    AND BRAKING ONLY MAKES SHAKING WORSE. I'VE CONTACTED DEALER AND THEY
                                         -255-
    Class Action Complaint
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SAID THEY REPLACED A BUSHING BUT PROBLEM PERSISTED. THEY HAVE NOT 1 CORRECTED THE PROBLEM. VEHICLE IS BASICALLY OUT OF CONTROL WHEN THIS 2 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 3 AND IS STOCK MODEL. PLEASE HELP! *TR 4 1 Affected Product 5 January 18, 2016 NHTSA ID NUMBER: 10820797 6 Components: ELECTRONIC STABILITY CONTROL, SUSPENSION, STEERING 7 NHTSA ID Number: 10820797 **Incident Date** August 8, 2015 8 Consumer Location SANDWICH, MA Vehicle Identification Number 1FTWW31566E**** 9 **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** FORD F-350 2006 COMPLAINT. WE HAVE EXPERIENCED VIOLENT SHAKING (SHIMMYING) 13 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 14 IN AUGUST 2015, ON THE INTERSTATE HIGHWAY WHILE TRAVELLING AT 75MP. WE HIT 15 A BUMP AND THE TRUCK / STEERING WHEEL SHOOK VIOLENTLY FOR ABOUT 10 SECONDS CAUSING US TO SWERVE ACROSS LANES AND STRUGGLE TO KEEP THE 16 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 17 50MMP AND AS RECENT AS 2 WEEKS AGO. WE HAVE CHECKED IT OUT AND OUR 18 MECHANIC ADVISED THAT HE COULD NOT FIND ANYTHING WRONG. IT HAS BEEN A GREAT CONCERN OF OURS AS IT PUTS OUR LIVES (AND THOSE ON THE ROAD WITH US) 19 AT DANGER WHEN THIS ISSUE OCCURS. ADDITIONALLY, EVERY TIME THE VIOLENT SHAKING OCCURS, IT THROWS OFF THE ALIGNMENT AND BALANCING FOR THE TRUCK. 20 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 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 23 SHOULD NOT BE APPROVED FOR USE ON HIGHWAYS AS THIS DEFECT COULD RESULT 24 IN FATAL ACCIDENTS IF THE SHAKING CANNOT BE CONTROLLED. ALSO, FORD SHOULD BE RESPONSIBLE FOR REPAIRING THE FAULTY TRUCKS. 25 1 Affected Product 26 27 May 26, 2016 NHTSA ID NUMBER: 10871068 Components: SUSPENSION, STEERING 28 **NHTSA ID Number:** 10871068 -256-

Class Action Complaint

```
Incident Date May 20, 2016
 1
    Consumer Location SANDWICH, MA
 2
    Vehicle Identification Number 1FTWW31566E****
    Summary of Complaint
 3
    CRASHNo
 4
    FIRENo
    INJURIES0
 5
    DEATHS0
    FORD F-350 2006 OSCILLATION I HAVE FILED A PREVIOUS COMPLAINT BEFORE RE THE
 6
    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
    NOW. WEDNESDAY MAY 11 APPROX 1PM EXITING THE BOURNE BRIDGE MA. I WAS
 8
    DRIVING AT APPROX 40MPH AND EXITING THE BRIDGE. THERE WAS A ROUGH
    CONSTRUCTION PATCH ON THE ROAD RIGHT WHERE THE ROAD CONNECTS TO THE
 9
    BRIDGE. AS I HIT THE ROUGH PATCH, THE OSCILLATION BEGAN AND THE TRUCK
10
    SHOOK UNCONTROLLABLY APPROACHING THE ROTARY. THERE WAS A LOT OF
    TRAFFIC AND CARS IN THE LANE BESIDE ME THAT COULD HAVE BEEN DAMAGED.
11
    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
12
    AND THE TRUCK BEGAN OSCILLATING VIOLENTLY. HE WAS UNABLE TO CONTROL IT
13
    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
    SHAKEN. THE TIRES HAVE BEEN INFLATED AS RECOMMENDED BY FORD WHEN THE
15
    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
    DEALER WHERE THE TRUCK WAS PURCHASED, FORD CUSTOMER SERVICE AND
17
    FORD HEAD OFFICE. EVEN THOUGH THEY ACKNOWLEDGE THE TRUCKS ARE
    DEFECTIVE, THEY SAY THEY ARE NOT RESPONSIBLE FOR REPAIRING THEM. OUR
18
    TRUCK IS OSCILLATING REALLY BADLY AND IS DANGEROUS TO DRIVE. THIS SHOULD
19
    BE A RECALL, NOT ONLY FOR THOSE OF US DRIVING THESE DEFECTIVE FORD F-350
    2006 TRUCKS, BUT FOR THE OTHER INNOCENT LIVES ON THE ROAD.
20
    1 Affected Product
21
22
    May 26, 2008 NHTSA ID NUMBER: 10228887
    Components: STEERING
23
    NHTSA ID Number: 10228887
24
    Incident Date May 10, 2008
    Consumer Location SHADOW HILLS, CA
25
    Vehicle Identification Number N/A
    Summary of Complaint
26
    CRASHNo
27
    FIRENo
    INJURIES0
28
    DEATHSO
                                       -257-
```

Class Action Complaint

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 2 CONTROLLED UNTIL VEHICLE IS SLOWED TO 30 MPH. ALMOST LOST CONTROL OF VEHICLE ON LOS ANGELES FREEWAYS. HAS HAPPENED MULTIPLE TIMES AND HAVE 3 BEEN TO FORD DEALER WITH NO ASSISTANCE. LAST EPISODE WAS LAST WEEK. 4 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 5 OTHER FORD OWNERS THAT HAVE HAD THE SAME COMPLAINT. *TR 1 Affected Product 6 7 March 28, 2008 NHTSA ID NUMBER: 10222609 8 **Components: SUSPENSION** 9 NHTSA ID Number: 10222609 **Incident Date** May 3, 2007 10 **Consumer Location** Unknown Vehicle Identification Number 1FTWW31P26E**** 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHSO** 14 TL*THE CONTACT OWNS A 2006 FORD F-350 SD. WHILE DRIVING 50 MPH, THE FRONT 15 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 16 UNEVEN PAVEMENT, OR IN VARIOUS OTHER DRIVING CONDITIONS. THE DEALER COULD NOT DUPLICATE THE FAILURE. THE PURCHASE DATE WAS UNKNOWN. THE 17 CURRENT MILEAGE WAS 44,000 AND FAILURE MILEAGE WAS 21,977. 18 1 Affected Product 19 20 July 9, 2009 NHTSA ID NUMBER: 10276278 Components: SUSPENSION, STEERING 21 NHTSA ID Number: 10276278 **Incident Date** September 15, 2008 22 **Consumer Location BOGART, GA** 23 Vehicle Identification Number N/A **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** 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 28 INDICATORS ILLUMINATED ON THE INSTRUMENT PANEL. IMMEDIATELY, THE DRIVER -258-

Class Action Complaint

1 PULLED THE VEHICLE OVER. SHE DROVE TO AN AUTHORIZED DEALER, BUT THEY COULD NOT DUPLICATE THE FAILURES. THE VEHICLE WAS TAKEN BACK TO AN 2 AUTHORIZED DEALER AND AN INDEPENDENT MECHANIC ON SEPARATE OCCASIONS FOR IDENTICAL FAILURES, BUT THERE WERE NO RESOLUTIONS. 3 CURRENTLY, THE AUTHORIZED DEALER IS REPLACING THE STEERING STABILIZER 4 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. 5 **1 Affected Product** 6 7 May 21, 2012 NHTSA ID NUMBER: 10459147 **Components: SUSPENSION** 8 NHTSA ID Number: 10459147 9 Incident Date August 8, 2008 Consumer Location READING, PA 10 Vehicle Identification Number 1FDWW31P96E**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** THE VEHICHE WHEN TRAVELING AT HIGHWAY SPEEDS IN EXCESS OF 55 MPH WHEN 14 HITTING A BUMP BEGINS TO SHAKE WHICH GROWS TO A VOILENT SHAKING. IN ORDER 15 TO STOP THIS SHAKING THE VEHICLE MUST BE SLOWED UNDER 25 MPH. THIS HAS HAPPENED ON NUMEROUS OCCASIONS BETWEEN THE DATE ABOVE AND TODAY. 16 REPEATED SERVICE VISITS TO A LOCAL FORD DEALERSHIP SERVICE CENTER HAVE BEEN UNABLE TO CORRECT THE PROBLEM. *TT 17 1 Affected Product 18 19 April 20, 2009 NHTSA ID NUMBER: 10266161 **Components: STEERING** 20 NHTSA ID Number: 10266161 21 **Incident Date June 22, 2008** Consumer Location PIQUA, OH 22 Vehicle Identification Number 1FTWW33P46E**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 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 27 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 28 AT ABOUT 40 MPH AND GETS REAL BAD AT ABOUT 55 MPH AND REALLY BAD SLOWING -259-Class Action Complaint

DOWN IN THAT SAME RANGE. ANY TIME I'VE HAD REPAIRS DONE BY THE 1 DEALERSHIP THE REPAIRS DONE TO MY TRUCK ON THE INVOICES STATE THE 2 DEALERSHIP VERIFIED COMPLAINT AND THEN HOW THEY FIXED THE PROBLEM BUT WHEN I TOOK MY TRUCK IN FOR THIS PROBLEM MY INVOICE READS MY 3 COMPLAINT AND THEN "NO REPAIR ATTEMPTED". THEY SAID THEY COULD NOT DUPLICATE THE PROBLEM SO THEY DID NOT REPAIR ANYTHING BUT ACCORDING 4 TO THE INVOICE THEY DID NOT EVEN LOOK AT IT BECAUSE IT DOESN'T SAY THEY 5 EVEN TRIED TO VERIFY MY COMPLAINT IT JUST SAYS "NO REPAIR ATTEMPTED". SO EACH MILE I HAVE PUT ON THE TRUCK TILL NOW THE PROBLEM HAS BEEN 6 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 EVERYTIME IT GETS TO 40 MPH AND DEFINITELY AROUND 50-55 MPH. SOMETIMES IT 8 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 WIFE AND 2 DAUGHTERS. I'VE HAD A COUPLE AUTO SHOPS LOOK AT MY TRUCK AND 10 THEY SAID I NEEDED NEW TIRES AND AN ALIGNMENT. SO I NEEDED THEM ANYWAY SO I TOOK IT AND GOT ALL "6"(DUALLY)NEW TIRES PUT ON AND AN ALIGNMENT AND 11 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 12 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 TO GET IT IN AND DO A LONG STEP-BY-STEP LIST OF PROCEDURES AND CHECKS TO 14 VERIFY THE PROBLEM BUT IT WILL COST CAUSE MY TRUCK IS OUT OF WARRANTY NOW. I HAVE NOT TAKEN IT IN YET. \$\$\$\$\$\$ *TR 15 **1 Affected Product** 16 17 September 13, 2013 NHTSA ID NUMBER: 10543396 18 Components: STEERING, SUSPENSION NHTSA ID Number: 10543396 19 **Incident Date** September 12, 2013 Consumer Location EL PASO, TX 20 Vehicle Identification Number 1FTSW21P77E**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo INJURIES0** 23 **DEATHS0** 24 I HAVE A 2007 F 250 DIESEL AND EVERY TIME I AM DRIVING OVER SPEED BUMP AT 45MPH TO 65MPH MY TRUCK SHAKES LIKE CRAZY IT HAS BEEN TAKEN TO THE 25 DEALER FOR A FIX BUT NOTHING IS DONE I AM AFRAID THAT ONE DAY THIS WILL COST AN ACCIDENT I HOPE THE THIS MATER IS TAKEN CARE SOON THANK YOU FOR 26 YOUR HELP. *TR 27 1 Affected Product 28

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Class Action Complaint Case No.

```
June 11, 2009 NHTSA ID NUMBER: 10273581
 1
    Components: STEERING, TIRES
2
    NHTSA ID Number: 10273581
    Incident Date June 11, 2009
3
    Consumer Location HAMMOND, LA
4
    Vehicle Identification Number 1FTSW21P27E****
    Summary of Complaint
5
    CRASHNo
    FIRENo
6
    INJURIES0
7
    DEATHSO
    WHEN DRIVING MY FORD F-250 45 MPH AND OVER AND HITTING ANY KIND OF BUMP
8
    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
9
    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
11
    DIAGNOSE THE PROBLEM.
    2 Affected Products
12
13
    August 23, 2010 NHTSA ID NUMBER: 10351350
14
    Components: STEERING
15
    NHTSA ID Number: 10351350
    Incident Date July 23, 2008
16
    Consumer Location FRESNO, CA
    Vehicle Identification Number 1FTSX21577E****
17
    Summary of Complaint
18
    CRASHNo
    FIRENo
19
    INJURIES0
20
    DEATHSO
    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
    INTERMITTENTLY. THE VEHICLE WAS SERVICED BY AN AUTHORIZED DEALER ON
22
    NUMEROUS OCCASIONS WHERE THE GEAR BOX AND STEERING COLUMN WERE
    REPLACED. THE FAILURE CONTINUED TO RECUR INTERMITTENTLY AND THE
23
    VEHICLE WAS TAKEN BACK TO THE AUTHORIZED DEALER. THE DEALER WAS
24
    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.
    1 Affected Product
26
27
    December 14, 2011 NHTSA ID NUMBER: 10439970
28
    Components: STEERING, SUSPENSION
                                        -261-
    Class Action Complaint
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```
1
    NHTSA ID Number: 10439970
    Incident Date June 17, 2011
 2
    Consumer Location Unknown
    Vehicle Identification Number 1FTSW21P87E****
 3
    Summary of Complaint
 4
    CRASHNo
    FIRENo
 5
    INJURIES0
    DEATHS0
 6
    PICKED UP MY F250 SUPER DUTY FROM THE SERVICE AT THE FORD DEALER, DRIVING
 7
    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
 8
    TO MAKE IT STOP SHAKING, ALMOST CAUSED A PILE UP. CALLED THE DEALER AND
    THEY SAID THEY'VE HEARD OF THE PROBLEM BUT NOTHING THEY CAN DO. *TR
 9
    1 Affected Product
10
11
    May 28, 2013 NHTSA ID NUMBER: 10513794
12
    Components: STEERING, WHEELS, STRUCTURE, SUSPENSION
    NHTSA ID Number: 10513794
13
    Incident Date May 26, 2013
    Consumer Location AUSTIN, TX
14
    Vehicle Identification Number 1FTSW21537E****
15
    Summary of Complaint
    CRASHNo
16
    FIRENo
    INJURIES0
17
    DEATHS0
18
    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
19
    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
20
    EXPERIENCING TURBULENT WOBBLING WITH THIS TRUCK AND I CAN ASSURE YOU
21
    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
    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
23
    UNEVEN SECTION OF THE HIGHWAY AND OUR TRUCK SUDDENLY STARTED SHAKING
24
    DANGEROUSLY OUT OF CONTROL! THANKFULLY MY HUSBAND WAS ABLE TO
    CONTROL THE STEERING WHEEL AND STEPPED ON THE BRAKE TO SLOW IT DOWN,
25
    OTHERWISE WHO KNOWS WHAT WOULD HAVE HAPPENED! THERE WAS TRAFFIC
    EVERYWHERE AND WE WERE LUCKY ENOUGH NOT TO HAVE AN ACCIDENT! THEN IT
26
    HAPPENED AGAIN A FEW HOURS LATER WHEN WE AGAIN DROVE OVER AN UNEVEN
27
    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
28
    CAN HONESTLY SAY THERE IS SOMETHING VERY WRONG WITH THIS VEHICLE. THIS IS
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Class Action Complaint

A SAFETY ISSUE AND PEOPLE CAN AND WILL LOSE THEIR LIVES OVER THIS IF THIS IS 1 NOT RESOLVED IMMEDIATELY! I HAVE CONTACTED FORD HEADQUARTERS TO 2 SUBMIT A FORMAL COMPLAINT AND THEY MERELY TOLD ME TO CONTINUE WORKING WITH THE DEALERSHIP THAT HAS UNRESOLVED MY ISSUE. I TRUST 3 THAT YOU WILL TAKE THIS COMPLAINT SERIOUSLY AS LIVES ARE AT STAKE BECAUSE OF THIS ISSUE. *TR 4 **1 Affected Product** 5 6 December 6, 2012 NHTSA ID NUMBER: 10487532 7 **Components: STEERING** NHTSA ID Number: 10487532 8 Incident Date December 15, 2009 9 Consumer Location STEVENSVILLE, MD Vehicle Identification Number N/A 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 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 14 AN UNEVEN ROAD SURFACE. THE VEHICLE WAS TAKEN TO THE DEALER WHERE 15 THE FAILURE COULD NOT BE REPLICATED. THE VEHICLE WAS NOT REPAIRED. THE VIN WAS NOT AVAILABLE. THE APPROXIMATE FAILURE MILEAGE WAS 30,000. 16 **1 Affected Product** 17 18 December 8, 2010 NHTSA ID NUMBER: 10369701 **Components: SUSPENSION** 19 NHTSA ID Number: 10369701 20 **Incident Date** November 12, 2010 Consumer Location HEMET, CA 21 Vehicle Identification Number 1FTWW31P77E**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** I HAVE A 2007 F-350 HARLEY DAVIDSON CC AT HIGHWAY SPEEDS MOSTLY IN CORNERS 25 BUT ALSO ON STRAIGHTAWAY, THE TRUCK STARTS SHAKE VIOLENTLY, ALMOST 26 UNCONTROLLABLE. TO GET THIS TO STOP, I HAVE TO SLOW WAY DOWN AND ALMOST STOP. THIS PROBLEM HAS BEEN REPORTED TO THE DEALER, WHERE THEY 27 REPLACED SOME OF THE FRONT STEERING COMPONENTS. I WAS TOLD THAT THE PROBLEM WAS FIXED, BUT ABOUT 100 MILES DOWN THE ROAD, THE SHAKING 28 STARTED AGAIN. I SUBSEQUENTLY CALLED THE DEALER, WHO INFORMED ME -263-Class Action Complaint

1 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 2 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 3 MAKES IT ALMOST IMPOSSIBLE TO CONTROL SAFELY. I FEEL VERY UNSAFE DRIVING 4 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 5 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 6 FOR IT, I JUST WANT SOMEONE TO TELL ME HOW TO FIX THIS PROBLEM. THERE HAVE 7 BEEN NO MODIFICATIONS, AND THE TIRES ON MY TRUCK HAVE BEEN SUPPLIED BY THE DEALER. *TR 8 **1 Affected Product** 9 10 May 13, 2010 NHTSA ID NUMBER: 10330354 Components: TRACTION CONTROL SYSTEM, STEERING 11 NHTSA ID Number: 10330354 12 **Incident Date** February 1, 2010 Consumer Location PAULINE, SC 13 Vehicle Identification Number 1FTSX21YX8E**** **Summary of Complaint** 14 **CRASHNo** 15 **FIRENo INJURIES0** 16 **DEATHS0** TL*THE CONTACT OWNS A 2008 FORD F250 SUPER DUTY. THE CONTACT STATED THAT 17 WHILE DRIVING AT 70 MPH OVER AN UNEVEN SURFACE, THE FRONT END OF THE 18 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 THE DEALER COULD NOT DUPLICATE THE FAILURE. THE DEALER INFORMED THE 20 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 DRIVE THE VEHICLE. THE FAILURE MILEAGE WAS APPROXIMATELY 15,000. THE 22 CURRENT MILEAGE WAS APPROXIMATELY 24,000. **1 Affected Product** 23 24 March 17, 2009 NHTSA ID NUMBER: 10262107 25 **Components: STEERING** 26 NHTSA ID Number: 10262107 **Incident Date June 10, 2008** 27 **Consumer Location** Unknown Vehicle Identification Number 1FDWW35R08E**** 28 **Summary of Complaint** -264-Class Action Complaint

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INJURIES0

Case No.

Class Action Complaint

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DEATHSO
 1
   TL* THE CONTACT OWNS A 2009 FORD F-250. THE CONTACT STATED THAT THE FRONT
2
   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
3
   STEERING WOULD BECOME DEFECTIVE WHEN THE FAILURE OCCURRED. ONCE THE
4
    VEHICLE WAS AT A COMPLETE STOP, THE FAILURE WOULD CEASE. THE VEHICLE WAS
    TAKEN TO THE DEALER WHERE THE TIRE PRESSURE AND ALIGNMENT WAS
5
   CHECKED, BUT THE DEALER DID NOT RECOMMEND ANY TYPE OF REPAIR. THE
   FAILURE MILEAGE WAS 70,000 AND THE CURRENT MILEAGE WAS 137,000. *TR UPDATED
6
   07/16/13*LJ
7
   1 Affected Product
   1 Associated Document
8
9
    March 2, 2015 NHTSA ID NUMBER: 10691517
10
    Components: SUSPENSION
    NHTSA ID Number: 10691517
11
    Incident Date November 24, 2012
12
   Consumer Location TORRINGTON, WY
    Vehicle Identification Number 1FTSW21Y89E****
13
    Summary of Complaint
   CRASHNo
14
   FIRENo
15
   INJURIES0
   DEATHS0
16
    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
17
    HAD TO MERGE TO THE SIDE OF THE ROAD DUE TO THE FAILURE. THE VEHICLE WAS
18
    TAKEN TO AN AUTHORIZED DEALER WHO PERFORMED AN ALIGNMENT. THE
    CONTACT INDICATED THAT A FEW YEARS LATER, THE FAILURE RECURRED. THE
19
    VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHO WAS NOT ABLE TO
    DUPLICATE OR DIAGNOSE THE FAILURE. THE VEHICLE WAS NOT REPAIRED. THE
20
    MANUFACTURER WAS NOTIFIED OF THE FAILURE AND WAS UNABLE TO
21
    DETERMINE A REMEDY. THE FAILURE MILEAGE WAS NOT AVAILABLE.
    1 Affected Product
22
23
    December 30, 2015 NHTSA ID NUMBER: 10817038
24
    Components: VISIBILITY/WIPER, STEERING, SUSPENSION
    NHTSA ID Number: 10817038
25
    Incident Date December 11, 2015
26
    Consumer Location SATSUMA. AL
    Vehicle Identification Number 1FTSW21R79E****
27
    Summary of Complaint
    CRASHNo
28
    FIRENo
                                        -266-
    Class Action Complaint
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INJURIES0 1 **DEATHS0** 2 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 3 ONLY STOPPED WHEN I BROUGHT THE PICKUP TRUCK TO A COMPLETE STOP. I TOOK 4 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 5 DID NOT KNOW WHAT CAUSED THIS PROBLEM. FORD CUSTOMER SERVICE SAID THEY DID NOT KNOW OF THIS PROBLEM AND COULD NOT HELP. LOOKING INTO 6 THIS ON GOOGLE, I FOUND HUNDREDS OF SIMILAR PROBLEMS COMMONLY CALLED 7 "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 8 TO DO. I AM AFRAID FOR MY FAMILY'S SAFETY AND OTHER MOTORISTS. *JS 1 Affected Product 9 10 June 2, 2016 NHTSA ID NUMBER: 10872235 11 **Components: STEERING, SUSPENSION** 12 NHTSA ID Number: 10872235 **Incident Date** March 10, 2016 13 Consumer Location BIGELOW, AR Vehicle Identification Number 1FTSW21R69E**** 14 **Summary of Complaint** 15 **CRASHNo FIRENo** 16 **INJURIES0 DEATHS0** 17 TL* THE CONTACT OWNS A 2009 FORD F-250 SD. THE CONTACT STATED THAT THE 18 FRONT END OF THE VEHICLE WAS UNSTABLE SHOOK AND VIBRATED EXCESSIVELY WITH AN EXTREME WOBBLE. THE DEALER WAS NOTIFIED OF THE FAILURE AND 19 WAS UNABLE TO PROVIDE A REPAIR SOLUTION TO PREVENT THE FAILURE. THE CONTACT TOOK THE VEHICLE TO MORE THAN FIVE DIFFERENT REPAIR SHOPS FOR 20 VARIOUS REPAIRS, BUT THE FAILURES CONTINUED IN THE FRONT AND REAR ENDS. 21 THE VEHICLE WAS NOT REPAIRED AND THE CONTACT WAS WAITING TO DETERMINE IF THE MANUFACTURER WOULD BE ABLE TO PROVIDE A PERMANENT REPAIR SOLUTION. 22 THE APPROXIMATE FAILURE MILEAGE WAS 180,000. 1 Affected Product 23 24 July 21, 2014 NHTSA ID NUMBER: 10614915 25 **Components: STEERING** 26 **NHTSA ID Number:** 10614915 **Incident Date** March 8, 2011 27 **Consumer Location** Unknown Vehicle Identification Number 1FTSW21R19E**** 28 **Summary of Complaint** -267-Class Action Complaint

```
1
    CRASHNo
    FIRENo
2
    INJURIES0
    DEATHSO
3
   TL* THE CONTACT OWNS A 2009 FORD F-250. THE CONTACT STATED WHILE DRIVING
4
    OVER A BUMP AT APPROXIMATELY 65 MPH, THE VEHICLE BEGAN SHAKING AND
    SWERVED INTO ANOTHER LANE. THE FAILURE RECURRED NUMEROUS TIMES. THE
5
    VEHICLE WAS TAKEN TO A DEALER. THE TECHNICIAN WAS UNABLE TO
    DUPLICATE OR DIAGNOSE THE FAILURE. HOWEVER, ALL FOUR TIRES WERE
6
    REPLACED ON FOUR OCCASIONS. THE MANUFACTURER WAS NOT NOTIFIED OF THE
7
    FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 40,000.
    1 Affected Product
8
9
    March 10, 2016 NHTSA ID NUMBER: 10845889
10
    Components: SUSPENSION
    NHTSA ID Number: 10845889
11
    Incident Date February 2, 2015
12
    Consumer Location SILVER CITY, NM
    Vehicle Identification Number 1FTSW2BR0AE****
13
    Summary of Complaint
    CRASHNo
14
    FIRENo
15
    INJURIES0
    DEATHS0
16
    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
17
    FRONT END VIBRATING AND SHAKING. THE VEHICLE WAS TAKEN TO THE DEALER
18
    BUT THE CAUSE OF THE FAILURE WAS NOT DETERMINED. THE MANUFACTURER
    WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 30,000.
19
    1 Affected Product
20
21
    April 11, 2016 NHTSA ID NUMBER: 10854925
    Components: SUSPENSION
22
    NHTSA ID Number: 10854925
23
    Incident Date January 15, 2015
    Consumer Location KATHLEEN, GA
24
    Vehicle Identification Number 1FTSW2BRXAE****
    Summary of Complaint
25
    CRASHNo
26
    FIRENo
    INJURIES0
27
    DEATHS0
    TL* THE CONTACT OWNS A 2010 FORD F-250. THE CONTACT DROVE OVER A SLIGHT
28
    BUMP AT 70 MPH AND THE VEHICLE BEGAN TO VIBRATE SEVERELY. THE FAILURE
                                         -268-
    Class Action Complaint
```

1 OCCURRED CONSTANTLY. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS DIAGNOSED, BUT THE CAUSE OF THE FAILURE WAS NOT FOUND. THE VEHICLE 2 WAS NOT REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 100,000. 3 1 Affected Product 4 5 April 26, 2012 NHTSA ID NUMBER: 10456617 **Components: STEERING** 6 NHTSA ID Number: 10456617 7 **Incident Date** November 1, 2011 **Consumer Location** Unknown 8 Vehicle Identification Number 1FTSW2BR1AE**** 9 **Summary of Complaint CRASHNo** 10 **FIRENo INJURIES0** 11 **DEATHS0** 12 TL* THE CONTACT OWNS A 2010 FORD F-250 SD DIESEL. THE CONTACT STATED THAT WHEN DRIVING AT VARIOUS SPEEDS OVER A ROAD BUMP, THE FRONT END OF THE 13 VEHICLE AND THE STEERING WHEEL WOULD JERK VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER WHO WAS UNABLE TO DIAGNOSE THE FAILURE. THE 14 MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE VEHICLE WAS NOT 15 REPAIRED. THE FAILURE MILEAGE WAS 58,000 AND THE CURRENT MILEAGE WAS 64,000. 16 **1 Affected Product** 17 18 January 6, 2015 NHTSA ID NUMBER: 10670511 **Components: STEERING** 19 NHTSA ID Number: 10670511 Incident Date September 17, 2014 20 **Consumer Location GARDEN RIDGE, TX** 21 Vehicle Identification Number 1FTSW2BRXAE**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** AT VARIOUS SPEEDS FROM 45 ON UP FRONTEND WILL SHAKE VIOLENTLY CAUSING 25 VEHICLE TO LOSS LANE CONTROL. MOST OFTEN IT IS FOLLOWING ANY COMPROMISE 26 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 27 IDENTIFIED THE PROBLEM CALLING IT THE €œDEATH WOBBLE€•. ALARMED BY THE NAME ALONE I ENQUIRED. THEY SAID THEY KNOW OF THE PROBLEM AND 28 THAT FORD IS NOT TAKING RESPONSIBILITY FOR IT. THEY ONLY OFFER THE -269-Class Action Complaint

CONSUMER TO PAY OUT OF POCKET FOR AFTERMARKET PART TO RECTIFY THEIR ILL 1 ENGINEERED FRONTEND. THIS IS A SERIOUS OCCURRENCE AND WILL END UP CAUSING 2 MANY WRECKS AND THE GREAT POTENTIAL FOR FATALITIES. I SEE FORD AND WHOEVER ELSE TURNS A BLIND EYE TO THIS SITUATION TO BE IN THE HEADLINES 3 RIGHT NEXT TO GM AND THEIR ATTEMPT TO PRETEND AND BURY ISSUES KNOWING 4 THEY PRESENT A COMPROMISE IN SAFETY. THERE IS A COUNTLESS NUMBER OF PEOPLE WHO HAVE DONE THEIR PART TO NOTIFY BOTH FORD AND NHTSA OF THIS 5 ONGOING ISSUE FOR YEARS AND BOTH SEEM NEGLIGENT NOT TO AGGRESSIVELY REMEDY ANY AND ALL CURRENT VEHICLES WITH THIS DEFECT, AS WELL AS, ANY 6 UNIT IN PRODUCTION. IT SHOULDN€™T TAKE BLOODSHED/DEATH FOR SOMEONE TO 7 TAKE OWNERSHIP OF THEIR DEFECTIVE PRODUCT. **1 Affected Product** 8 9 September 10, 2015 NHTSA ID NUMBER: 10763032 10 Components: STEERING, WHEELS, SUSPENSION NHTSA ID Number: 10763032 11

Incident Date October 20, 2012

12 **Consumer Location MEMPHIS, TN**

Vehicle Identification Number 1FTWW3DR6AE****

13 **Summary of Complaint**

CRASHNo 14 **FIRENo**

15 **INJURIES0**

DEATHS0

19

20

21

22

23

24

26

27

28

16 LOSS OF CONTROL WHEN DRIVING ON BUMPY SECTION OF FREEWAY, DUE TO EXTREME SHAKING OF FRONT END. IT SEEM TO AMPLIFY IN THE SEVERITY AND 17 VIOLENCE OF THE SHAKING UNTIL I WAS ABLE TO SLOW THE TRUCK TO UNDER 10 18

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 PROBLEM. THE FORD SERVICE TECHNICIAN ADMITTED THAT THIS WAS A COMMON PROBLEM FOR THIS MAKE AND MODEL BUT THAT NEITHER FORD

OR THE DEALER 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 IS OBVIOUSLY A DESIGN AND MANUFACTURING FLAW.

THIS IS A VERY DANGEROUS 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 DEFECTIVE TRUCK, WE ARE NOT ABLE TO USE THE

TRUCK FOR THE PURPOSE WE INTENDED. WE COULD NOT BE MORE DISAPPOINTED IN 25 FORD AND OUR DEALER. 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

1 Affected Product

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Class Action Complaint Case No.

1 January 24, 2012 NHTSA ID NUMBER: 10445092 2 **Components: STEERING, SUSPENSION NHTSA ID Number:** 10445092 3 **Incident Date** January 1, 2012 4 Consumer Location BIRMINGHAM, AL Vehicle Identification Number N/A 5 **Summary of Complaint CRASHNo** 6 **FIRENo** 7 **INJURIES0 DEATHS0** 8 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 9 VIOLENTLY WOBBLE SO MUCH THAT USUALLY THE VEHICLE HAS TO BE STOPPED ON 10 THE SIDE OF THE ROAD TO STOP THE WOBBLE. THE COVER ON THE DASH OVER THE PASSENGER AIRBAG HAS CRACKED DUE TO THE VIOLENT SHAKING IN THE TRUCK. 11 ALSO, FLUID HAS BEGUN TO LEAK FROM THE FRONT PASSENGER WHEEL AS A RESULT OF THE SHAKING AS WELL. BOTH FORD AND THE DEALERSHIP HAS BEEN UNABLE 12 TO OFFER ANY REMEDY. PLEASE HELP WITH THIS SITUATION. I HAVE VIDEOS IF 13 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 NHTSA ID Number: 10462887 17 **Incident Date June 24, 2012** 18 Consumer Location LAKELAND, FL Vehicle Identification Number 1FT7W2B63BE**** 19 **Summary of Complaint CRASHNo** 20 **FIRENo** 21 **INJURIES0 DEATHSO** 22 AT HIGH SPEEDS OVER 50 MPH, IF TRUCK HITS A BUMP, FRONT END SHAKES VIOLENTLY UNTIL YOU COME TO A COMPLETE STOP. DEALER HAS NO ANSWER. ON 23 INTERNET MANY OTHERS HAVING SAME PROBLEM, CALLED "DEATH RATTLE". *TR 24 **1 Affected Product** 25 26 November 30, 2012 NHTSA ID NUMBER: 10486566 **Components: SUSPENSION** 27 NHTSA ID Number: 10486566 **Incident Date** November 1, 2012 28 Consumer Location SHREVEPORT, LA -271-

Class Action Complaint

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Vehicle Identification Number 1FT7W2B6XBE****
 1
    Summary of Complaint
2
    CRASHNo
    FIRENo
3
   INJURIES0
4
    DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE
5
    DRIVING AT HIGHWAYS SPEEDS, DRIVING OVER A BUMP THE VEHICLE STARTED TO
    SHAKE VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER WHO WAS UNABLE
6
    TO DIAGNOSE THE FAILURE. THE MANUFACTURER WAS NOT MADE AWARE OF THE
7
    FAILURE. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 40,000 AND
    THE CURRENT MILEAGE WAS 45,000.
8
    1 Affected Product
9
10
    July 21, 2013 NHTSA ID NUMBER: 10526016
    Components: STEERING, WHEELS, SUSPENSION
11
    NHTSA ID Number: 10526016
12
    Incident Date July 4, 2013
    Consumer Location DALLAS, TX
13
    Vehicle Identification Number N/A
    Summary of Complaint
14
    CRASHNo
15
    FIRENo
    INJURIES0
16
    DEATHS0
    I HAVE HAD REPEATED ISSUES WITH THE STEERING OF MY TRUCK. I HAVE TAKEN IT
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
    UNAWARE OF HOW COMMON THIS ISSUE WAS UNTIL I STARTED READING FORMS
19
    WHERE MANY PEOPLE HAVE HAD THE SAME COMPLAINT. I HAVE NEARLY LOST
    CONTROL OF MY TRUCK WAY TOO MANY TIMES. *TR
20
    1 Affected Product
21
22
    March 27, 2014 NHTSA ID NUMBER: 10575179
23
    Components: STEERING, WHEELS, SUSPENSION
    NHTSA ID Number: 10575179
24
    Incident Date February 10, 2014
    Consumer Location NORTON, VA
25
    Vehicle Identification Number 1FT7X2B61BE****
26
    Summary of Complaint
    CRASHNo
27
    FIRENo
    INJURIES0
28
    DEATHSO
                                         -272-
    Class Action Complaint
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TRUCK DEVELOPED A VIOLENT SHAKE IN THE FRONT END AND BECAME
 1
   UNCONTROLLABLE. HAVE TO STOP IMMEDIATELY BEFORE VEHICLE WILL STOP
2
   SHAKING. THE ISSUE IS REFERRED TO THE "FORD DEATH WOBBLE" WITH MANY
   RECORDED INSTANCES OF THIS ON THE WEB AND YOUTUBE. ISSUE HAS GOTTEN
3
   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
4
   CORRECT SO IT HAS BEEN IN TWO OTHER GARAGES FOR SECOND OPINIONS.
5
   CONTACTED FORD MOTOR COMPANY AND THEY HAVE NO RECALLS OR ANY
    KNOWLEDGE OF THIS PROBLEM. VEHICLE IS A DANGER TO THE HIGHWAY. *TR
6
    1 Affected Product
7
8
    June 27, 2017 NHTSA ID NUMBER: 11001691
9
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 11001691
10
   Incident Date June 15, 2013
   Consumer Location VICTORIA, TX
11
    Vehicle Identification Number 1FT7W2BT4BE****
12
   Summary of Complaint
    CRASHNo
13
   FIRENo
   INJURIES0
14
    DEATHSO
15
   TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH, THE VEHICLE
    WOBBLED AND SHOOK VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER
16
    (MAC HAIK FORD LINCOLN HYUNDAI 4506 N NAVARRO ST, VICTORIA, TX 77904), BUT
    THE DEALER WAS UNABLE TO DUPLICATE THE FAILURE. THE DEALER REPLACED
17
   UNKNOWN PARTS ON THE FRONT END OF THE VEHICLE, BUT THE FAILURE
18
    RECURRED SEVERAL MORE TIMES. THE MANUFACTURER STATED THAT THE
    CONTACT SHOULD TAKE THE VEHICLE TO A DEALER AND HAVE IT DIAGNOSED.
19
    THE CONTACT WAS REFERRED TO NHTSA. THE APPROXIMATE FAILURE MILEAGE WAS
   25,000.
20
    1 Affected Product
21
22
    September 18, 2012 NHTSA ID NUMBER: 10475859
23
    Components: STEERING, POWER TRAIN
    NHTSA ID Number: 10475859
24
   Incident Date April 1, 2012
    Consumer Location HYATTSVILLE, MD
25
    Vehicle Identification Number 1FT7W2BT9BE****
26
   Summary of Complaint
   CRASHNo
27
   FIRENo
   INJURIES0
28
   DEATHSO
                                        -273-
    Class Action Complaint
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TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE
 1
    TRAVELING 66 MPH, THE VEHICLE SHOOK VIOLENTLY AND THERE WAS LOSS OF
2
    ACCELERATION POWER. THE VEHICLE WAS ABLE TO BE DRIVEN TO THE
    CONTACT'S RESIDENCE AND WAS LATER TAKEN TO AN AUTHORIZED DEALER
3
    WHERE THE FAILURE COULD NOT BE DUPLICATED. LATER WHILE TRAVELING 35
    MPH, THE VEHICLE BEGAN TO WOBBLE UNCONTROLLABLY, CAUSING THE VEHICLE TO
4
    VEER TO THE LEFT ABNORMALLY. THE VEHICLE WAS TAKEN TO THE DEALER
5
    WHERE THE FAILURE COULD NOT BE DUPLICATED. THE VEHICLE WAS NOT
    REPAIRED HOWEVER, THE FAILURE RECURRED SEVERAL TIMES. THE MANUFACTURER
6
    WAS NOT CONTACTED. THE FAILURE MILEAGE WAS 4,000 AND THE CURRENT MILEAGE
7
    WAS 59,306.
    1 Affected Product
8
9
    January 15, 2013 NHTSA ID NUMBER: 10493002
10
    Components: STEERING
    NHTSA ID Number: 10493002
11
    Incident Date January 12, 2013
    Consumer Location BALTIMORE, MD
12
    Vehicle Identification Number N/A
13
    Summary of Complaint
    CRASHNo
14
    FIRENo
15
    INJURIES0
    DEATHS0
16
    TL* THE CONTACT OWNS A 2011 FORD F250 SD. THE CONTACT STATED THAT WHILE
    DRIVING 65 MPH, THE FRONT END STARTED TO SHAKE VIOLENTLY AND HE WAS
17
    UNABLE TO CONTROL THE VEHICLE. THE VEHICLE WAS FORCED OFF THE ROAD TO
18
    THE SHOULDERS. THE VEHICLE WAS TAKEN TO THE DEALER WHO ADVISED THAT
    THERE WERE NO REPAIRS AND OFFERED NO ASSISTANCE. THE MANUFACTURER
19
    WAS NOT NOTIFIED. THE VIN WAS UNKNOWN. THE FAILURE MILEAGE WAS 45,000.
    1 Affected Product
20
21
    February 20, 2013 NHTSA ID NUMBER: 10499454
22
    Components: STEERING
23
    NHTSA ID Number: 10499454
    Incident Date February 20, 2013
24
    Consumer Location MCLOUD, OK
    Vehicle Identification Number 1FT7W2BT1BE****
25
    Summary of Complaint
26
    CRASHNo
    FIRENo
27
    INJURIES0
    DEATHS0
28
                                        -274-
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Class Action Complaint

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WHILE TRAVELING AT HIGHWAY SPEED I HIT A BUMP AND THE VEHICLE BEGAN TO
 1
    VIOLENTLY SHAKE. I HAD TO PULL THE VEHICLE OFF THE ROAD TO GAIN CONTROL.
2
    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
3
    THE SIDE OF THE HIGHWAY TO GAIN CONTROL OF THE VEHICLE. THE NHTSA NEED TO
4
    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
5
    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
6
    THE TRUCK AND HAS GRADUALLY GOTTEN WORSE. I HAVE TAKEN THE TRUCK TO
7
    THE DEALERSHIP FOR REPAIR AT 14,000 MILES AND AT 20,000 MILES WITH NO FIX
    PROVIDED. *TR
8
    1 Affected Product
9
10
    April 7, 2014 NHTSA ID NUMBER: 10578052
    Components: STEERING, SUSPENSION
11
    NHTSA ID Number: 10578052
12
   Incident Date March 20, 2013
    Consumer Location WASHINGTON, MI
13
    Vehicle Identification Number 1FT8W3DT6EA****
   Summary of Complaint
14
    CRASHNo
15
   FIRENo
   INJURIES0
16
   DEATHS0
   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
   DOING IT. YOUTUBE VIDEOS SHOW VIOLENT SHAKE TO THE POINT YOUR HEAD CAN
19
    SMACK THE SIDE WINDOWS. FRONT END ON HIGHWAY HITS SLIGHT BUMP LIKE ON
   OVER PASS SHAKES SO VIOLENTLY IT CAN BREAK THE FRONT END WHEEL TIRES AND
20
    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
   SO HARD YOU CANNOT CONTROL LOCK THE BRAKES DOWN HARD TO 30 MPH JUST
22
    LIKE EVERYONE ELSE ON THE NET SAYS. NEARLY CAUSING WRECKS ON THE
   FREEWAY, HAPPENS WITHOUT WARNING, TOTALLY STOCK $55K TRUCK, DEALER SAYS
23
    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
   DEATH WOBBLE IT AND SEE VIDEOS. MY FIRST EVER ONLINE COMPLAINT. THIS
25
    FORD TRUCK IS INSANELY DANGEROUS. AT DEALER NOW WITH NO SOLUTION, I
   DISCOVERED BY SWITCHING INTO 4WHD IT WILL STOP WHICH TELLS ME IT IS
26
    INTERNAL CONTROL ARM BUSHINGS BECAUSE 4WD WILL BIND THE FRONT END UP
27
    ENOUGH TO PRELOAD SUSPENSION. IT GOT ME HOME BUT THE WIFE WILL NEVER RIDE
   IN IT AGAIN! *TR
28
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Class Action Complaint

1 Affected Product

```
1
 2
    November 18, 2015 NHTSA ID NUMBER: 10794621
    Components: SUSPENSION, STEERING
 3
    NHTSA ID Number: 10794621
 4
    Incident Date October 25, 2015
    Consumer Location MERIDIAN, ID
 5
    Vehicle Identification Number 1FT7W2BT1CE****
    Summary of Complaint
 6
    CRASHNo
 7
    FIRENo
    INJURIES0
 8
    DEATHS0
    DRIVING AT HIGHWAY SPEEDS OF 55 - 65MPH AND HIT A SLIGHT BUMP IN THE ROAD
9
    THE ENTIRE FRONT END OF THE VEHICLE SHAKES UNCONTROLLABLY. IN ORDER TO
10
    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
11
    THIS ISSUE EXISTS AND HAS SINCE 2005 BUT THERE ISN'T ANY RESOLUTION FOR
12
    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
    THE SAME ISSUE.
14
    1 Affected Product
15
16
    February 18, 2018 NHTSA ID NUMBER: 11073450
17
    Components: SUSPENSION
    NHTSA ID Number: 11073450
18
    Incident Date January 17, 2018
    Consumer Location CORPUS CHRISTI, TX
19
    Vehicle Identification Number 1FT7W2BTXCE****
20
    Summary of Complaint
    CRASHNo
21
    FIRENo
    INJURIES0
22
    DEATHS0
23
    FRONT SUSPENSION SHAKES VIOLENTLY AT HIGHWAY SPEEDS. THE PROBLEM IS
    REFERRED TO AS THE "DEATH WOBBLE" BY THE FORD DEALERSHIP SERVICE
24
    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????
    1 Affected Product
27
28
    July 9, 2018 NHTSA ID NUMBER: 11110173
                                         -276-
    Class Action Complaint
    Case No.
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Components: SUSPENSION 1 NHTSA ID Number: 11110173 2 **Incident Date** July 4, 2018 Consumer Location COLUMBUS GROVE, OH 3 Vehicle Identification Number 1FT7W2BTXCE**** 4 **Summary of Complaint CRASHNo** 5 **FIRENo INJURIES0** 6 **DEATHS0** 7 THE TRUCK SHAKES VIOLENTLY AT TIMES AFTER A BUMP IN THE ROAD. OUR TRUCK 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. 9 LAST SUMMER IT GOT SO BAD IT WAS SCARY TO DRIVE SO WE TOOK IT TO ANOTHER 10 MECHANIC WHO PUT NEW SUSPENSION PARTS IN THE FRONT END. AFTER A COUPLE THOUSAND IN REPAIRS AND MANY NEW PARTS, IT STILL SHAKES SO VIOLENTLY WE 11 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 12 GRAND-DAUGHTERS IN IT ONE DAY TWO WEEKS AGO AND AFTER NOT HAPPENING 13 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 THIS PROBLEM! IT SEEMS LIKE IT RARELY HAPPENS AT 40 MPH OR BELOW BUT 15 HAPPENS QUICKLY AT 55 MPH OR MORE. IF SOMEONE DIES FROM THIS "DEATH 16 WOBBLE" IT SHOULD BE FORD'S RESPONSIBILITY. **1 Affected Product** 17 18 July 11, 2018 NHTSA ID NUMBER: 11110864 19 **Components: SUSPENSION** NHTSA ID Number: 11110864 20 **Incident Date** July 9, 2018 21 Consumer Location COLUMBIA CITY, IN Vehicle Identification Number 1FT7W2BT3CE**** 22 **Summary of Complaint CRASHNo** 23 **FIRENo** 24 **INJURIES0 DEATHSO** 25 THE VEHICLE WILL RANDOMLY SHAKE VIOLENTLY CAUSING LOSS OF CONTROL OF THE TRUCK WHILE DRIVING. AFTER DOING RESEARCH I FOUND PEOPLE WHO HAVE 26 REFERRED TO THIS AS THE "DEATH WOBBLE." I HAVE HAD REPAIRS TO MY TRUCK 3 27 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 28 ONLY TEMPORARY AND EACH TIME I HAVE IT FIXED IT LASTS 6-9 MONTHS. THE

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Class Action Complaint

DEALERSHIP IS UNWILLING TO HELP NOR IS FORD CUSTOMER COMPLAINT 1 **DEPARTMENT.** THIS HAPPENS WHILE DRIVING 55-65 MPH AND AFTER HITTING A BUMP. 2 1 Affected Product 3 4 August 17, 2018 NHTSA ID NUMBER: 11120681 **Components: STEERING** 5 NHTSA ID Number: 11120681 Incident Date August 19, 2017 6 Consumer Location SKOKIE, IL 7 Vehicle Identification Number 1FT7W2BT4CE**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHSO** AS REPORTED FROM PREVIOUS OWNERS, DEATH WOBBLE HAS HAPPENED A NUMBER 11 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 ANYTHING WRONG STARTED DRIVING AND WOBBLE WAS GONE. THE STEERING 14 WHEEL HAS STARTED DOING MORE OF THE "DEATH WOBBLE" AT ANY SPEED. I SPOKE 15 WITH THE FORD DEALER AND THEY DIDN'T HAVE AN ANSWER. WHEN YOU SPEND \$65,000.00 AND THIS HAPPENS THE MANUFACTURER SHOULD BE SENDING OUT RECALL 16 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 17 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 Components: STEERING, SUSPENSION, UNKNOWN OR OTHER 22 **NHTSA ID Number:** 10854813 23 **Incident Date** November 12, 2013 Consumer Location GOSHEN, OH 24 Vehicle Identification Number 1FT7W2BT5CE**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** SEVERAL TIMES, AFTER HITTING A SMALL BUMP IN THE ROAD, GENERALLY AT SPEEDS 28 OVER 50 MPH, I HAVE EXPERIENCED AN EXTREME "SHIMMY" IN THE FRONT END OF -278-Class Action Complaint

THE VEHICLE CAUSING LIMITED CONTROL. I TOOK THE VEHICLE TO THE DEALER 1 FOR REPAIRS, HOWEVER, THEY COULD NOT DETERMINE THE CAUSE AND AFTER 2 REPLACING SEVERAL PARTS THEY WERE STILL NOT ABLE TO RESOLVE THE PROBLEM. I TOOK THE VEHICLE TO A PRIVATE REPAIR SHOP AND HAD SEVERAL 3 OTHER PARTS REPLACED AND STILL NO RESOLUTION TO THE PROBLEM. BALANCING 4 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, 5 I AM AFRAID TO DRIVE THE VEHICLE 1 Affected Product 6 7 July 29, 2016 NHTSA ID NUMBER: 10891584 8 Components: ELECTRONIC STABILITY CONTROL, STEERING 9 NHTSA ID Number: 10891584 Incident Date September 1, 2014 10 **Consumer Location** Unknown Vehicle Identification Number 1FT8W3BT4CE**** 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHSO** 14 TL* THE CONTACT OWNS A 2012 FORD F-350. WHILE DRIVING APPROXIMATELY 75 MPH, 15 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 16 DECREASE IN SPEED. THE VEHICLE WAS EVENTUALLY TURNED OFF TO STOP THE VIBRATION. THE CONTACT TOOK THE VEHICLE TO THE DEALER WHO INFORMED 17 THE CONTACT THAT THIS WAS COMMON AMONG FORD VEHICLES AND WAS 18 KNOWN AS THE "DEATH WOBBLE." THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE 19 RECURRED. THE APPROXIMATE FAILURE MILEAGE WAS 141,000. 1 Affected Product 20 21 August 6, 2016 NHTSA ID NUMBER: 10893771 22 Components: STEERING, SUSPENSION, WHEELS 23 NHTSA ID Number: 10893771 **Incident Date** July 4, 2015 24 Consumer Location ROSLYN HARBOR, NY Vehicle Identification Number 1FT8W3BT7EE**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHS0** 28 -279-

Class Action Complaint

1 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 2 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 3 LEFT WHEN IMPACTED BY A SLIGHT BUMP, THE TRUCK GOES INTO A VIOLENT 4 SHAKING. THE ATTEMPT OF APPLYING THE BRAKES WOULD MAKE THE SYMPTOMS WORSE. THE ATTEMPT OF INCREASING SPEED WOULD AGAIN MAKE THE SYMPTOMS 5 WORSE. STEERING IS ALMOST NONE EXISTENT AS THE STEERING WHEEL IS SHAKING PROFUSELY. FORD MANUFACTURER IS AWARE OF THIS ISSUE, YET NO RESOLUTION 6 BY THEM. THE DEALERSHIP HAS BEEN GIVEN AMPLE OPPORTUNITY TO FIX THE 7 TRUCK, BUT THEY HAVE NOT BEEN ABLE TO. THE PROBLEM CONTINUES AND IS ALSO PLAGUING OTHER SIMILAR VEHICLES. THE LINK ATTACHED HERE WILL SHOW 8 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 9 DROPPING. 10 HTTP://VID1108.PHOTOBUCKET.COM/ALBUMS/H403/DNMELAMED/FORD%20F350/FHSN88 581 ZPSWZN4GWYE.MP4 AND 11 HTTP://VID1108.PHOTOBUCKET.COM/ALBUMS/H403/DNMELAMED/FORD%20F350/IMG_92 601 ZPSBCRDEDTL.MP4 12 **1 Affected Product** 13 14 February 3, 2016 NHTSA ID NUMBER: 10823993 15 **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 CRASHNo** 19 **FIRENo** 20 **INJURIES0 DEATHSO** 21 TL* THE CONTACT OWNS A 2015 FORD F-250. WHILE DRIVING AT VARIOUS SPEEDS, THE VEHICLE SUDDENLY BECAME TURBULENT. SHOOK, AND A KNOCKING NOISE WAS 22 HEARD FROM THE ENGINE. THE CONTACT WOULD HAVE TO PARK AND TURN OFF THE VEHICLE IN ORDER TO STOP THE FAILURE FROM OCCURRING. THE CONTACT TOOK 23 THE VEHICLE TO THE DEALER FIVE TIMES. THE DEALER STATED THAT THIS WAS 24 A COMMON FAILURE WITH THE VEHICLE AND THERE WAS NO REMEDY. THE VEHICLE WAS NOT REPAIRED. THE FAILURE RECURRED. THE MANUFACTURER 25 STATED THAT THE FAILURE DID NOT QUALIFY UNDER THE LEMON LAW. THE VIN WAS UNKNOWN. THE APPROXIMATE FAILURE MILEAGE WAS 19,000. 26 1 Affected Product 27

28

June 5, 2018 NHTSA ID NUMBER: 11099958

-280-

Class Action Complaint

1 **Components: STEERING, WHEELS** NHTSA ID Number: 11099958 2 **Incident Date** May 31, 2018 Consumer Location SUGAR HILL, NH 3 Vehicle Identification Number 1FT8X3BT7FE**** 4 **Summary of Complaint CRASHNo** 5 **FIRENo INJURIES0** 6 **DEATHSO** 7 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. 8 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 9 PROBLEM. WORRIED I WILL BE KILLED OR KILL SOMEONE WHEN DRIVING THIS 10 VEHICLE. **1 Affected Product** 11 12 October 20, 2018 NHTSA ID NUMBER: 11141552 13 **Components: STEERING** NHTSA ID Number: 11141552 14 **Incident Date** October 14, 2018 15 Consumer Location GROTON, CT Vehicle Identification Number 1FT7X2B69GE**** 16 **Summary of Complaint CRASHNo** 17 **FIRENo** 18 **INJURIES0 DEATHSO** 19 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 20 GROWN STEADILY WORSE. IT HAPPENS WHEN HITTING BUMPS OR BRIDGE EXPANSION 21 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 22 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 23 MILE EXTENDED WARRANTY. THE TRUCK IS ESSENTIALLY UNSAFE AT HIGHWAY 24 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 25 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 26 THEY DO MAY BE ON MY DIME, WHICH JUST BLOWS MY MIND. AGAIN, PLEASE 27 INTERJECT INTO THIS ISSUE BEFORE SOMEONE IS KILLED AND TO SAVE THE BUYERS FROM HAVING TO PAY FORD TO ADDRESS THIS OBVIOUS ENGINEERING MISTAKE. 28 1 Affected Product -281-

Class Action Complaint

1 2 December 12, 2017 NHTSA ID NUMBER: 11054256 **Components: STEERING** 3 NHTSA ID Number: 11054256 4 Incident Date October 12, 2017 **Consumer Location MASON, TX** 5 Vehicle Identification Number 1FDRF3FT1GE**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** 9 TL* THE CONTACT OWNS A 2016 FORD F-350. WHILE DRIVING VARIOUS SPEEDS, THE VEHICLE BEGAN TO SHAKE VIOLENTLY WITHOUT WARNING. THE FAILURE RECURRED 10 RANDOMLY. THE VEHICLE WAS TAKEN TO THE LOCAL DEALER (MCLEAN FORD OF FREDERICKSBURG, 1279 US-87, FREDRICKBURG, TX 78624), BUT THE CAUSE OF THE 11 FAILURE COULD NOT BE DETERMINED. THE VEHICLE WAS ALSO TAKEN TO AN 12 INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE STEERING DAMPER FAILED AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE 13 MANUFACTURER WAS NOTIFIED OF THE FAILURE AND DID NOT ASSIST. THE FAILURE MILEAGE WAS APPROXIMATELY 14,000. 14 **1 Affected Product** 15 16 April 12, 2018 NHTSA ID NUMBER: 11084855 17 **Components: SUSPENSION** NHTSA ID Number: 11084855 18 **Incident Date** April 6, 2018 Consumer Location FREDERICKSBURG, VA 19 Vehicle Identification Number 1FT7W2BT4HE**** 20 **Summary of Complaint CRASHNo** 21 **FIRENo INJURIES0** 22 **DEATHS0** 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 GOES AWAY AT 25MPH. DEALERSHIP COULD NOT FIND A VISIBLE PROBLEM, BUT 25 DID EXPERIENCE THE WOBBLE. MECHANIC WAS TERRIFIED. FORD HQ TOLD THEM 26 TO RANDOMLY CHANGE COMPONENTS UNTIL THE PROBLEM WAS FIXED. IT DID GO AWAY UNTIL NOW. TRUCK HAS 22K MILES ON IT AND THE DEATH WOBBLE IS 27 BACK, DEALERSHIPS CANT SEE ANYTHING WRONG BUT WONT DRIVE TRUCK LONG ENOUGH TO HIT THE 'RIGHT' BUMP TO TRIGGER THE WOBBLE, SO WONT RE-FIX 28 IT. THIS IS A CATASTROPHIC FAILURE OF THE FRONT END, AND FORD CLAIM NOT TO -282-Class Action Complaint Case No.

KNOW ANYTHING ABOUT IT. PA DEALERSHIP TOLD ME THEY HAD HEARD ABOUT IT 1 BEING AN ISSUE, AND OTHER PEOPLE ON LINE ARE EXPERIENCING THE SAME 2 THING. 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 3 HITTING ME. THIS PROBLEM MUST BE RECTIFIED, OR SOMEONE WILL BE INJURED. THE 4 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 5 TRIGGER IT. 1 Affected Product 6 7 May 14, 2018 NHTSA ID NUMBER: 11093735 8 **Components: STEERING, SUSPENSION** 9 NHTSA ID Number: 11093735 **Incident Date** May 1, 2018 10 **Consumer Location MARIETTA, GA** Vehicle Identification Number 1FT7W2BT4HE**** 11 **Summary of Complaint** 12 **CRASHNo FIRENo** 13 **INJURIES0 DEATHSO** 14 VIOLENT DEATH WOBBLE WHEN HITTING A BUMP AT SPEEDS OVER 50 MPH. VEHICLE 15 BECOMES VERY UNSTABLE AND SHAKES VIOLENTLY. MUST REDUCE SPEED IMMEDIATELY TO UNDER 20 MPH TO REGAIN CONTROL. HAVE TAKEN TO DEALER 16 AND THEY CANNOT FIX THE PROBLEM, INVESTIGATING LEMON LAW. INCREDIBLEY UNSAFE PROBLEM. HAVE SEEN NUMEROUS REPORTS OF THIS CONDITION AND STILL 17 NO FIX/RECALL. 18 1 Affected Product 19 20 October 23, 2018 NHTSA ID NUMBER: 11141982 Components: STEERING, SUSPENSION 21 NHTSA ID Number: 11141982 Incident Date October 19, 2018 22 Consumer Location VACAVILLE, CA 23 Vehicle Identification Number 1FT7W2B60HE**** **Summary of Complaint** 24 **CRASHNo FIRENo** 25 **INJURIES0** 26 **DEATHSO** 10/19/2018, AT 54 MPH, ON A SMOOTH, 4 LANE FREEWAY AT 4:30 AM, MY TRUCK BEGAN 27 SHAKING AND VIBRATING VIOLENTLY AS THOUGH I WAS DRIVING ON A ROLLING FLAT TIRE. I IMMEDIATELY LET OFF THE GAS TO SLOW DOWN AS QUICKLY AS I COULD 28 WITHOUT BRAKING; ALTHOUGH DIFFICULT TO STEER, I WAS ABLE TO GET THE TRUCK -283-

Class Action Complaint

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OVER TO THE SHOULDER OF THE ROAD TO INSPECT IT. I COULD NOT DETERMINE
 1
    THERE WAS ANYTHING WRONG WITH THE TRUCK OR ANY EVIDENCE I UNKNOWINGLY
2
    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
3
    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
4
    TIRE SHOP WHOM I HAVE DONE BUSINESS WITH ALL MY FLEET TRUCKS AND
5
    TRUST THEIR EXPERIENCE IN SUSPENSION, TIRE, BRAKE AND SHOCK SERVICES.
   THE MANAGER TOLD ME THE SAME THING ABOUT THE FORD DEATH WOBBLE. HE
6
    SAID HE WOULD BE HAPPY TO LOOK AT THE TRUCK AND MAKE SURE NOTHING
7
   WAS LOOSE, BROKEN AND THAT THE ALIGNMENT WAS CORRECT. THAT ALL
    CHECKED OUT FINE. AFTER RESEARCHING THIS, I LEARNED THAT THIS IS COMMON
8
   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
9
   NHTSA TAKES THIS ISSUE SERIOUSLY AND BECOMES INVOLVED IN THE REMEDY OF
10
    THIS PROBLEM.
    1 Affected Product
11
12
    October 26, 2018 NHTSA ID NUMBER: 11142955
13
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 11142955
14
    Incident Date August 31, 2018
15
   Consumer Location LOS GATOS, CA
    Vehicle Identification Number N/A
16
    Summary of Complaint
   CRASHNo
17
   FIRENo
18
   INJURIES0
   DEATHSO
19
    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
    BLVD, NORTH HILLS, CA 91343, 1-(818) 787-3800) KEPT THE VEHICLE FOR MONTHS.
22
    BUT COULD NOT DIAGNOSE OR REPAIR THE VEHICLE. THE DEALER DID NOT
   PROVIDE A LOANER VEHICLE OPTION DURING THAT TIME. THE MANUFACTURER WAS
23
    NOTIFIED OF THE FAILURE AND THE CONTACT WAS WAITING ON THEIR RESPONSE.
24
    THE VIN AND FAILURE MILEAGE WERE NOT AVAILABLE.
    1 Affected Product
25
26
    November 13, 2018 NHTSA ID NUMBER: 11151224
27
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Components: STEERING

NHTSA ID Number: 11151224 **Incident Date** October 27, 2018

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Class Action Complaint

Case No.

28

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28

Consumer Location GRIMESLAND, NC

Vehicle Identification Number 1FT7W2B65HE****

2 | Summary of Complaint

CRASHNo

FIRENo

| INJURIES0

DEATHSO

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

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 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.

1 Affected Product

- 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 exhibit a steering wheel oscillation after hitting rough pavement or an expansion joint during a slight left turn 50-55 mph." That TSB recommended that service technicians test the tire pressure of affected 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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3. **Examples of NHTSA Consumer Complainants Who Were Told by Defendant Ford** 1 and/or its Authorized Dealers that the Death Wobble Was Caused by Tires, 2 3 Improper Tire Pressure, Tire Balancing and Rotation, Wheel Alignment, Steering Stabilizer, Ball Joints, Tie Rods, Universal Joint, Steering Dampener, Track Link, 4 5 Stearing Gear Box, Track Bar Bushings, Shocks, and/or Front Drive Link 53. The following are just a few examples of the consumer complaints submitted to NHTSA 6 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 stabilizer, ball joints, tie rods, universal joint, steering dampener, track link, stearing gear box, track bar 9 10 bushings, shocks, and/or front drive link. 11 December 17, 2018 NHTSA ID NUMBER: 11161969 12 **Components: STEERING, SUSPENSION** NHTSA ID Number: 11161969 13 **Incident Date** December 4, 2018 14 Consumer Location EUSTIS, FL Vehicle Identification Number 1FT7W2BT0JE**** 15 **Summary of Complaint CRASHNo** 16 **FIRENo** 17 **INJURIES0 DEATHS0** 18 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 FIX THE ISSUE BUT DOESN'T. THE TIRES ON THE TRUCK ARE GOODYEAR WRANGLER 21 KEVLAR TIRES THAT CAME ON THE TRUCK FROM THE DEALERSHIP AND NOW HAVE ONLY 20,000 MILES AND ARE NOWHERE NEAR WORN OUT! IT HAS HAPPENED TO ME AT 22 SLOWER SPEEDS (AROUND 45 MPH) IN THE CITY, BUT MOSTLY OCCURS AROUND 60-23 70MPH ON THE HIGHWAY. 1 Affected Product 24 25

February 2, 2019 **NHTSA ID NUMBER: 11173650**

Components: STEERING, SUSPENSION

NHTSA ID Number: 11173650 Incident Date January 14, 2019 Consumer Location FAIRPORT, NY

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Class Action Complaint

Case No.

26

27

28

Vehicle Identification Number 1FT7W2BT7HE**** 1 **Summary of Complaint** 2 **CRASHNo FIRENo** 3 **INJURIES0** 4 **DEATHS0** WHEN TRAVELING AT HIGHWAY SPEEDS (60+ MPH) AND YOU HIT CERTAIN TYPES OF 5 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 6 OVER A ROAD IMPERFECTION WHERE THE TWO FRONT WHEELS HIT IT 7 INDEPENDENTLY IE A SKEWED ANGLE BRIDGE JOINT OR A SINGLE POT HOLE. AT THE DEALERS INSTRUCTION I HAVE ROTATED AND BALANCED TIRES, CHECKED TIRE 8 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 9 "DEATH WOBBLE" WHICH IT APPEARS FORD HAS ISSUED A TECHNICAL SERVICE 10 BULLETIN FOR. I AM GOING TO TRY ANOTHER DEALER AND GIVE THEM THE INFO I HAVE. 11 1 Affected Product 12 13 July 24, 2017 NHTSA ID NUMBER: 11010308 14 **Components: SUSPENSION** 15 NHTSA ID Number: 11010308 **Incident Date** February 15, 2015 16 Consumer Location COLORADO SPRINGS, CO Vehicle Identification Number 1FT8W3BT0DE**** 17 **Summary of Complaint** 18 **CRASHNo FIRENo** 19 **INJURIES0** 20 **DEATHSO** 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 22 WHEN THE SHAKING OCCURRED AND THE CHECK ENGINE WARNING INDICATOR ILLUMINATED. THE VEHICLE WAS TAKEN TO PHIL LONG FORD OF MOTOR CITY 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 BAR BUSHINGS, SPRING MOUTH, STEERING STABILIZER SHOCK, AND ALL FOUR 25 TIRES NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE **RECURRED.** THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO 26 TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS OFFERED. 27 THE FAILURE MILEAGE WAS 53,000. 1 Affected Product 28

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Class Action Complaint Case No.

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1
   December 5, 2016 NHTSA ID NUMBER: 10930091
2
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 10930091
3
   Incident Date March 1, 2016
4
   Consumer Location LIVINGSTON, TX
    Vehicle Identification Number 1FT7W2BT1CE****
5
   Summary of Complaint
   CRASHNo
6
   FIRENo
7
   INJURIES0
   DEATHS0
8
   FORD F250 TRUCK - FRONT END SUSPENSION AND 4 WHEEL DRIVE PROBLEMS. SINCE
   MARCH OF THIS YEAR 2016, @ 90K MILES, WHILE DRIVING DOWN THE ROAD,
9
   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
    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
14
    LOCAL FORD DEALERSHIP FOR REPAIRS ON THE SUSPENSION PROBLEM - "DEATH
    WOBBLE". REPAIRS INCLUDED, BAR - FRONT SUSPENSION TI, JOINT ASY - BALL,
15
    NUT, END ASY - DRAG LINK ROD, ROD, ROD ASY - DRAG LINK, ADJUSTER ASY @ 2,
16
    ALL REPLACED WITH NEW PARTS. REPLACE DRAG INK AND END, INSTALL
    ADJUSTERS FOR CASTOR, FRONT END ALIGNMENT (4 WHEEL DRIVE). THE FORD
17
    DEALERSHIP WAS EVEN AWARE OF THIS EXISTING PROBLEM WITH THE FORD F250
    SUSPENSION, FROM PREVIOUS COMPLAINS AND REPAIRS. MY REPAIR COST WAS
18
    $1205.07. NOW MY 4 WHEEL DRIVE WILL NOT LOCK IN ON THE FRONT END. I HAVE
19
    AN APPOINTMENT, TAKING MY TRUCK BACK TO FORD DEALERSHIP TOMORROW
    MORNING FOR ADDITIONAL REPAIRS. THIS IS A MAJOR SAFETY ISSUE ON THESE
20
    VEHICLES AND SOMETHING MUST BE DONE ABOUT IT. A RECALL SHOULD AND MUST
21
   BE MANDATORY FOR THE PUBLIC SAFETY. THIS ISSUE WILL END UP KILLING SOMEONE
    (IF, IT HAS NOT ALREADY) IF, A RECALL IS NOT ORDERED IMMEDIATELY. *TR
22
    1 Affected Product
23
24
    June 3, 2016 NHTSA ID NUMBER: 10874077
    Components: SUSPENSION
25
    NHTSA ID Number: 10874077
   Incident Date September 1, 2013
26
    Consumer Location DESERT HOT SPRINGS, CA
27
    Vehicle Identification Number 1FT7X2B61CE****
   Summary of Complaint
28
    CRASHNo
                                        -288-
    Class Action Complaint
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FIRENo 1 **INJURIES0** 2 **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 4 SHAKING WILL NOT STOP UNTIL THE TRUCK IS STOPPED, AND DURING THAT TIME IT'S SHAKING SO VIOLENTLY IT'S UNCONTROLLABLE. THE DEALERSHIP HAS 5 CONTINUOUSLY TOLD ME IT'S THE TIRES, BUT THE TIRES ARE STILL IN DECENT SHAPE. IT'S HAPPENING AGAIN, AND IT'S VERY SCARY, FOR ME AND MINE, AND 6 OTHERS. 7 1 Affected Product 8 December 27, 2013 NHTSA ID NUMBER: 10557495 9 Components: STEERING, SUSPENSION, POWER TRAIN 10 NHTSA ID Number: 10557495 **Incident Date** December 2, 2013 11 Consumer Location RIVERTON, UT Vehicle Identification Number 1FT8W3BTXBE**** 12 **Summary of Complaint** 13 **CRASHNo FIRENo** 14 INJURIES0 15 **DEATHSO** WAS ON FREEWAY ABOUT 55 TO 65 MPH AND ALL OF A SUDDEN THE TRUCK WENT 16 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 17 STARTED OUT AGAIN IT WAS FINE. 2 DAYS LATER IT DID IT AGAIN ONLY THIS TIME I 18 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. HAD DEALER CHECK 19 ITY OUT THE FOLLOWING WEEK AND THEY BLAMED IT ON THE TIRES, AND SAID IT **NEEDED AN ALIGNMENT. *TR** 20 1 Affected Product 21 22 August 28, 2012 NHTSA ID NUMBER: 10472738 23 **Components: STEERING** NHTSA ID Number: 10472738 24 **Incident Date** August 1, 2011 **Consumer Location HOUSTON, TX** 25 Vehicle Identification Number 1FT7W2BT9BE**** 26 **Summary of Complaint CRASHNo** 27 **FIRENo INJURIES0** 28 **DEATHSO** -289-Class Action Complaint

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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
2
   CONTACT WAITED UNTIL THE SHAKING CEASED INDEPENDENTLY HOWEVER, THE
   FAILURE RECURRED FREQUENTLY. THE VEHICLE WAS TAKEN TO THE DEALER WHO
3
   ADVISED THAT THE FAILURE WAS CAUSED BY THE TIRES AND RECOMMENDED
   HAVING A FRONT END ALIGNMENT PERFORMED. THE CONTACT STATED THAT ALL
4
   FOUR TIRES WERE REPLACED AND AN ALIGNMENT WAS PERFORMED HOWEVER,
5
    THE FAILURE PERSISTED. THE MANUFACTURER WAS NOT MADE AWARE OF THE
   FAILURE. THE FAILURE MILEAGE WAS 10. THE CURRENT MILEAGE WAS 31,000.
6
    1 Affected Product
7
8
    January 22, 2018 NHTSA ID NUMBER: 11064272
9
    Components: SUSPENSION
   NHTSA ID Number: 11064272
10
   Incident Date January 21, 2018
   Consumer Location ANCHORAGE, AK
11
    Vehicle Identification Number 1FT7W2BT5BE****
12
   Summary of Complaint
    CRASHNo
13
   FIRENo
   INJURIES0
14
   DEATHS0
15
   FROM DAY 1 I HAVE HAD ISSUES WHERE THE FRONT END WOULD BOUNCE
    UNCONTROLLABLY AT HIGHWAY SPEEDS AFTER HITTING A POTHOLE OR BRIDGE
16
   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
17
    NOT FIX THE ISSUE. I ALMOST RAN OFF THE ROAD 4 TIMES IN ONE TRIP BECAUSE OF
18
    THIS AS I COULD NOT MAINTAIN CONTROL. THIS WILL KILL SOMEONE IF NOT
    RESEARCHED AND CORRECTED BY FORD.
19
    1 Affected Product
20
21
    July 5, 2017 NHTSA ID NUMBER: 11003164
   Components: SUSPENSION, WHEELS
22
    NHTSA ID Number: 11003164
23
    Incident Date April 3, 2017
    Consumer Location BAKERSFIELD, CA
24
    Vehicle Identification Number 1FT7W2BT6BE****
    Summary of Complaint
25
   CRASHNo
26
   FIRENo
   INJURIES0
27
   DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH OVER A BUMP IN
28
    THE ROADWAY, THE VEHICLE SHOOK VIOLENTLY UNTIL SLOWING TO 30 MPH OR
                                        -290-
```

COMING TO A FULL STOP. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE 1 VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THE LOCAL DEALER 2 (JIM BURKE FORD 2001 OAK ST, BAKERSFIELD, CA 93301 (661) 328-3600), BUT THE FAILURE COULD NOT BE DUPLICATED OR DIAGNOSED. THE CONTACT WAS 3 ADVISED TO REPLACE ALL FOUR TIRES. ALL FOUR TIRES WERE REPLACED, BUT THE ISSUE PERSISTED. THE MANUFACTURER WAS NOTIFIED AND REFERRED THE 4 CONTACT TO NHTSA. THE FAILURE MILEAGE WAS 225,000. 5 **1 Affected Product** 6 7 July 2, 2014 NHTSA ID NUMBER: 10607693 Components: SUSPENSION, STEERING 8 NHTSA ID Number: 10607693 9 **Incident Date** May 14, 2014 Consumer Location MULDROW, OK 10 Vehicle Identification Number 1FT7X2BTXBE**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE 14 DRIVING AT 60 MPH ON UNEVEN ROAD PAVEMENT, THE VEHICLE STARTED TO 15 VIBRATE. THE CONTACT ALSO STATED THAT HE REDUCED THE SPEED TO 10 MPH, THE VIBRATION STOPPED. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS 16 DIAGNOSED THAT ALL FOUR TIRES NEEDED TO BE REPLACED AND BALANCED. THE TECHNICIAN ALSO ALIGNED BOTH FRONT DRIVERS AND PASSENGERS SIDE 17 TIRES. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE VEHICLE 18 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 APPROXIMATE FAILURE MILEAGE WAS 30,000. **1 Affected Product** 20 21 February 5, 2012 NHTSA ID NUMBER: 10446711 22 Components: SUSPENSION, STEERING 23 NHTSA ID Number: 10446711 Incident Date December 15, 2011 24 Consumer Location SAINT CHARLES, MO Vehicle Identification Number 1FT7W2BT1BE**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHSO** 28 -291-

Class Action Complaint

I WAS DRIVING ON HIGHWAY 55 NORTH IN IMPERIAL MISSOURI WITH MY 3 YR OLD 1 SON IN REAR CAR SEAT WHEN I WENT OVER SOME NORMAL ROAD BUMP AND MY 2 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 3 WAY TO MOVE TO LEFT OR RIGHT. THANK GOD I WAS NOT BEING TAILGATED! I WAS 4 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 5 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 6 FORD ENGINEER LOOK AT IT AND THEY REPLACED A TRACK BAR BALL JOINT AND 7 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 8 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 9 TIRES AND ALIGNMENT WRONG WITH MY TRUCK!!!!! MY FAMILY TRUCK HAS BECOME 10 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 11 1 Affected Product 12 13 December 7, 2011 NHTSA ID NUMBER: 10438881 Components: STEERING, SUSPENSION 14 NHTSA ID Number: 10438881 15 **Incident Date** December 7, 2011 Consumer Location BIRMINGHAM, AL 16 Vehicle Identification Number 1FT7W2BT3BE**** **Summary of Complaint** 17 **CRASHNo** 18 **FIRENo INJURIES0** 19

DEATHS0

22

23

25

28

20 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

21 VIOLENTLY WOBBLE SO MUCH THAT USUALLY THE VEHICLE HAS TO BE STOPPED ON

THE SIDE OF THE ROAD TO STOP THE WOBBLE. THE DEALERSHIP SUGGESTED NEW TIRES WHICH WE REPLACED HOWEVER THE PROBLEM STILL EXISTS. 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

24 1 Affected Product

26 May 13, 2013 NHTSA ID NUMBER: 10512156 Components: SUSPENSION, STEERING

NHTSA ID Number: 10512156 Incident Date November 1, 2012

Consumer Location CHESAPEAKE, VA

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Class Action Complaint

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Vehicle Identification Number 1FTWW31R49E****
 1
    Summary of Complaint
 2
    CRASHNo
    FIRENo
 3
    INJURIES0
 4
    DEATHS0
    I AM THE ORIGINAL OWNER OF A 2009 FORD F350 SRW DIESEL CREW CAB. AT
 5
    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
 6
    MPH. THE VIBRATION IS SO GREAT THAT THE STEERING WHEEL REQUIRES A TIGHT
 7
    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
    TRIES TO PUSH AWAY FROM THE TURN. I TOOK MY TRUCK TO THE DEALER ON
 9
    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
    CORRECT THE PROBLEM. I TOOK IT BACK THE SECOND TIME AND THEY CHANGED
11
    OUT THE BALL JOINTS, TIE RODS, STEERING DAMPER, DID A FRONT END
    ALIGNMENT AND BALANCED MY WHEELS. IT SEEMED TO WORK FOR A SHORT
12
    TIME UNTIL A PART FELL OFF THE FRONT END OF MY TRUCK AND HIT ANOTHER
13
    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
    IT BACK AND TALKED TO THE TECHNICIAN BEFORE I LEFT THE TRUCK SO HE
15
    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
    DRIVES JUST LIKE ALL F350'S WITHOUT A LOAD. I HAVE PUT MY SLIDE IN CAMPER
17
    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
18
    AS DESCRIBED BY MANY INTERNET POSTINGS. THE FORD REP I SPOKE TO SAID
19
    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
    Components: SUSPENSION
23
    NHTSA ID Number: 10496839
24
    Incident Date September 12, 2012
    Consumer Location RIVERTON, UT
25
    Vehicle Identification Number 1FTWW31R99E****
    Summary of Complaint
26
    CRASHNo
27
    FIRENo
    INJURIES0
28
    DEATHSO
                                       -293-
    Class Action Complaint
```

TL* THE CONTACT OWNS A 2009 FORD F-350 SD. THE CONTACT STATED THAT WHILE 1 DRIVING 65 MPH, HE DROVE OVER A BUMP IN THE ROAD AND THE FRONT DRIVER SIDE 2 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 3 WAS CONFIRMED THAT THE FRONT HUB HAD SEIZED AND NEEDED TO BE REPLACED ALONG WITH THE GEAR BOX. THE TIRES, SHOCKS, AND DUAL 4 STABILIZERS WERE ALL REPLACED BUT THE FAILURE RECURRED SO THE DEALER 5 ADJUSTED THE STEERING GEAR BOX. THE CONTACT STATED THAT THE FAILURE WAS NOT REMEDIED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 6 75,000 AND THE CURRENT MILEAGE WAS 99,000. 7 1 Affected Product 8 9 March 13, 2010 NHTSA ID NUMBER: 10319436 **Components: SUSPENSION** 10 NHTSA ID Number: 10319436 Incident Date March 12, 2010 11 Consumer Location RAYMOND, NH 12 Vehicle Identification Number 1FTWX31508E**** **Summary of Complaint** 13 **CRASHNo FIRENo** 14 **INJURIES0** 15 **DEATHSO** 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. I REPLACED TIRES WITH ONE OF THE BEST YOU CAN BUY. CONTINUED TO DO THE SAME THING. FORD BLAMED 17 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 18 BACK TO THE DEALERSHIP. SOMEDAY I'M GOING TO KILL SOMEONE OR MYSELF IN 19 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 IVOO 20 05/26/10 21 **1 Affected Product 2 Associated Documents** 22 23 24 February 7, 2018 NHTSA ID NUMBER: 11067423 **Components: STEERING** 25 NHTSA ID Number: 11067423 26 **Incident Date** February 6, 2018 Consumer Location RINGWOOD, NJ 27 Vehicle Identification Number 1FTSW21Y88E**** **Summary of Complaint** 28 **CRASHNo** -294-Class Action Complaint

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

-296-

Class Action Complaint Case No.

CRASHNo

```
FIRENo
1
   INJURIES0
2
   DEATHS0
   TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING 40 MPH
3
   OVER A POT HOLE WHEN THE STEERING WHEEL BEGAN TO SHAKE ABNORMALLY. THE
4
   CONTACT WAITED UNTIL THE SHAKING CEASED INDEPENDENTLY HOWEVER, THE
   FAILURE RECURRED FREQUENTLY. THE VEHICLE WAS TAKEN TO THE DEALER WHO
5
   ADVISED THAT THE FAILURE WAS CAUSED BY THE TIRES AND RECOMMENDED
   HAVING A FRONT END ALIGNMENT PERFORMED. THE CONTACT STATED THAT ALL
6
   FOUR TIRES WERE REPLACED AND AN ALIGNMENT WAS PERFORMED HOWEVER,
7
   THE FAILURE PERSISTED. THE MANUFACTURER WAS NOT MADE AWARE OF THE
   FAILURE. THE FAILURE MILEAGE WAS 10. THE CURRENT MILEAGE WAS 31,000.
8
   1 Affected Product
9
10
   December 8, 2016 NHTSA ID NUMBER: 10933947
   Components: STEERING, SUSPENSION
11
   NHTSA ID Number: 10933947
12
   Incident Date December 5, 2016
   Consumer Location VILLAGE MILLS, TX
13
   Vehicle Identification Number 1FT7W2BT8CE****
   Summary of Complaint
14
   CRASHNo
15
   FIRENo
   INJURIES0
16
   DEATHS0
   VIOLENT SHAKING FROM FRONT STEERING AND SUSPENSION. KNOWN PROBLEM
17
   WITH FORD SERVICE TECHNICIANS AND INDEPENDENT TIRE DEALERS. FORD
18
   CALLS IT "DEATH WOBBLE". MOST AFFECTED YEAR MODELS ARE 2006 THRU 2012
   PER SERVICE WRITER. PROBLEM STARTS APPROXIMATELY 42 MPH IN MY TRUCK ON
19
   HIGHWAYS OR CITY STREETS USUALLY AFTER A SMALL BUMP IN ROAD.. SHAKING IN
   STEERING WHEEL AND BOUNCING IN CAB. I HAD TO COME TO A COMPLETE STOP TO
20
   STOP THE SHAKE AND BOUNCE. THE FORD DEALER REPLACED TRACK BAR AND
21
   BALL JOINT. THEN REPLACED FOUR TIRES, BALANCED, AND FRONT END
   ALIGNMENT, TRUCK NOW HAS CONSTANT VIBRATION IN STEERING WHEEL.
22
   DEATH WOBBLE HAS OCCURRED TWICE SINCE REPAIR. GOING BACK TO DEALER.
   THIS PROBLEM HAS BEEN REPORTED AND WELL KNOWN TO FORD. NO SPECIFIC CAUSE
23
   OR FIX HAS BEEN OFFERED. SUPPOSEDLY FORD REDESIGNED FRONT STEERING AND
24
   SUSPENSION IN 2014 MODELS BECAUSE OF THIS PROBLEM. THE SERVICE WRITER,
   WENDY, AT SILSBEE FORD IN SILSBEE, TEXAS TOLD ME SHE DID NOT KNOW WHY FORD
25
   DOES NOT RECALL THESE TRUCKS IT IS SUCH A BIG PROBLEM.
   1 Affected Product
26
27
   September 4, 2014 NHTSA ID NUMBER: 10629783
28
   Components: STEERING, SUSPENSION
                                       -297-
```

Class Action Complaint

1 **NHTSA ID Number:** 10629783 **Incident Date** February 1, 2014 2 Consumer Location BISHOP, CA Vehicle Identification Number 1FT8W3BT3BE**** 3 **Summary of Complaint** 4 **CRASHNo FIRENo** 5 **INJURIES0 DEATHS0** 6 2011 FORD F-350. CONSUMER WRITES IN REGARDS TO SEVERE STEERING WHEEL 7 OSCILLATION PROBLEMS. *SMD THE CONSUMER STATED HE MUST BRING THE VEHICLE TO A COMPLETE STOP, TO GET THE VEHICLE TO STOP SHAKING. IT HAS 8 HAPPENED SEVERAL TIMES. ON TWO OCCASIONS, THE SHAKING WAS BAD THE TREAD SEPARATED FROM THE TIRE. THE VEHICLE WAS TAKEN TO THE DEALER SEVERAL 9 TIMES, AND NOTHING WAS DONE, EXCEPT ROTATING THE TIRES AND CHECKING 10 THE AIR PRESSURE. IN FEBRUARY 2014, THE DEALER REPLACED THE STEERING DAMPER. THE PROBLEM WENT AWAY FOR ABOUT FIVE MONTHS. THE DEALER 11 INFORMED THE CONSUMER, THE VEHICLE NEEDS NEW TIE RODS, FRONT DRIVE LINK, A FRONT TRACK BAR AND AN ALIGNMENT. *JB 12 **1 Affected Product** 13 1 Associated Document 14 15 October 23, 2014 NHTSA ID NUMBER: 10649518 **Components: STEERING, SUSPENSION** 16 NHTSA ID Number: 10649518 Incident Date October 22, 2014 17 Consumer Location ZEBULON, NC 18 Vehicle Identification Number 1FT7W2BT9BE**** **Summary of Complaint** 19 **CRASHNo FIRENo** 20 **INJURIES0** 21 **DEATHSO** MY HUSBAND WAS DRIVING THROUGH A ROAD CONSTRUCTION WORK ZONE WHEN 22 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. MY HUSBAND TOOK IT TO THE LOCAL DEALERSHIP 25 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 26 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 VEHICLE CONTINUES TO DO THE" DEATH WOBBLE" AS IT HAS BEEN COINED ONLINE. 28 -298-

Class Action Complaint

PLEASE HAVE SOMEONE LOOK INTO THIS PROBLEM . I HAVE ALSO EMAILED FORD 1 MOTOR COMPANY . *TR 2 1 Affected Product 3 4 July 24, 2014 NHTSA ID NUMBER: 10615932 Components: WHEELS, STEERING, SUSPENSION 5 **NHTSA ID Number:** 10615932 **Incident Date** January 3, 2011 6 **Consumer Location DUNN. NC** 7 **Vehicle Identification Number** 1FT7W2B67BE**** **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHSO** DEATH RUMBLE: AFTER ANY NEW SET OF TIRES GETS ABOUT 15,000 -20,000 MILES ON 11 THEM, THE INFAMOUS "DEATH RUMBLE" OCCURS ON THIS MODEL TRUCK. WHEN 12 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 SHAKING. IT IS SO BAD THAT YOU CANNOT CONTROL STEERING AT TIMES AND IS 14 EVEN VISIBLE TO OTHERS NOT IN THE VEHICLE. ALL FORD DEALERS THAT I HAVE 15 SPOKEN WITH ABOUT THIS ARE AWARE OF THE ISSUE BUT BLAME IT ON TIRES OR TIRE PRESSURE. I HAVE TRIED SEVERAL TYPES OF TIRES (AS I KNOW HAVE OVER 16 125,000 MILES ON MY TRUCK) AND ALWAYS INFLATE THEM AS PER MY OWNER'S MANUAL...THIS DOES NOT HELP...NOR 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. AND AS I SAID, DEALERS EVEN KNOW ABOUT THIS ISSUE...SO WHY IS IT NOT GETTING 19 CORRECTED??? *TR 1 Affected Product 20 21 September 9, 2012 NHTSA ID NUMBER: 10474424 22 Components: STEERING, SUSPENSION, WHEELS 23 NHTSA ID Number: 10474424 **Incident Date** May 1, 2012 24 Consumer Location MORGANTOWN, WV Vehicle Identification Number 1FT7W2BT1BE**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHSO** 28 -299-Class Action Complaint

DRIVING APPROXIMATELY 45 MPH ON A STATE HIGHWAY, MAKING A SLIGHT LEFT 1 TURN, HIT A SMALL BUMP IN THE ROAD, AND THE STEERING WHEEL STARTED 2 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 3 COMPLETE STOP TO END THE JERKING. THIS HAS BEEN HAPPENING ON ALMOST A 4 DAILY BASIS. THE VEHICLE CURRENTLY HAS 22,193 MILES ON IT. IT HAS BEEN TO THE DEALERSHIP AT LEAST 4 TIMES AND THEY HAVE BEEN CALLED NUMEROUS TIMES 5 WITH THE PROBLEM. THEY HAVE CHECKED THE TIRE PRESSURE SEVERAL TIMES. THE FRONT END. CHANGED THE STEERING DAMPER, WHICH SLIGHTLY HELPED 6 FOR ABOUT 500 MILES. IT IS NOW HAPPENING EVERY TIME I DRIVE THE VEHICLE 7 AND IS GETTING WORSE. NOW ALSO HAPPENING AT LOWER SPEEDS, AROUND 30 MPH AND UP. *TR 8 1 Affected Product 9 10 May 29, 2012 NHTSA ID NUMBER: 10459926 **Components: STEERING, SUSPENSION** 11 NHTSA ID Number: 10459926 12 **Incident Date** May 29, 2012 Consumer Location MIDLAND, TX 13 Vehicle Identification Number N/A **Summary of Complaint** 14 **CRASHNo** 15 **FIRENo INJURIES0** 16 **DEATHS0** 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 WOBBLE. I WAS ONLY ABLE TO REGAIN CONTROL BY COMING TO ALMOST A 19 COMPLETE STOP VERY CLOSELY AVOIDING AN ACCIDENT. I HAVE NOTICED THIS DEATH WOBBLE BEFORE ON MY 2007 FORD F-250 AND NOW IT HAS STARTED ON MY 20 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 AIR PRESSURE ON TIRES. THIS PROBLEM IS A MAJOR ISSUE AND WILL CAUSE SERIOUS 22 ACCIDENTS IF IT HAS NOT ALREADY. AFTER ARRIVING AT WORK I SEARCHED THE INTERNET FOR OTHERS WITH SIMILAR PROBLEMS AND IT SEEMS ALL FORD F-250 4X4'S 23 HAVE THE SAME ISSUE ALL THEY WAY UP TO THE CURRENT MODEL. THERE ARE TONS 24 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=8EUO6F8RGT4 HTTP://WWW.YOUTUBE.COM/WATCH?V=PSDBCV-GCS8 26 HTTP://WWW.TOPIX.COM/FORUM/AUTOS/FORD-F-250-SUPER-27 DUTY/T0SGDCTMOBHE5JER1/P13 HTTP://WWW.RACE-DEZERT.COM/FORUM/SHOWTHREAD.PHP/82022-F250-OUOT-DEATH-WOBBLE-OUOT-28 STEERING-ISSUE. *TR -300-

Class Action Complaint

1 1 Affected Product 2 April 23, 2013 NHTSA ID NUMBER: 10509217 3 **Components: STEERING, SUSPENSION** 4 NHTSA ID Number: 10509217 **Incident Date** December 3, 2012 5 Consumer Location BROCKPORT, NY Vehicle Identification Number N/A 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** 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 SLOW TO ABOUT 20MPH TO STOP IT. VERY DANGEROUS AT HIGHWAY SPEEDS AS YOU 11 CANNOT KEEP LANE CONTROL. ALREADY DESTROYING THE FRONT TIRES AND 12 DEALERS HAVE SAID TO KEEP PROPER AIR PRESSURE. I HAVE BEEN AN AUTO MECHANIC FOR OVER 15 YRS NOW AND THAT IS THE BEST EXCUSE THE DEALER 13 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 14 GOOGLE FOR THIS TOPIC ALONE. PLEASE ASSIST WITH KEEPING US SAFE AND DEMAND 15 A FIX AND RECALL BEFORE PEOPLE ARE KILLED DRIVING OR EVEN BEING NEAR THIS VEHICLE. *TR 16 **1 Affected Product** 17 18 March 12, 2013 NHTSA ID NUMBER: 10502520 Components: STEERING, SUSPENSION, WHEELS 19 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 **DEATHSO** I WAS DRIVING MY 2009 F-250 TRAVELING ABOUT 40 TO 45 MPH AND AFTER HITTING A 25 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 PROBLEM ON 6 PLUS TIMES. FORD STATES THAT IT WAS A TIRE PRESSURE 27 ISSUE......BS!....BS! EACH TIME FORD HAS MY TRUCK THEY SAY WE HAVE FIXED THE PROBLEM AND IT SHOULD NOT OCCUR AGAIN. THE LAST TIME I LEFT FORD AND 28 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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ROAD AND WENT INTO A "DEATH WOBBLE AGAIN. I TURNED THE TRUCK AROUND AND
 1
    IT IS SITTING AT FORD AS I WRITE THIS POST. AFTER REVIEWING THIS MATTER ON
2
    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
3
    WOBBLE " AS OCCURRED TO ME, I HAVE BEEN LUCKY SO FAR TO DRIVE OUT OF IT
4
    WITH OUT A PROBLEM. I MIGHT NOT BE SO LUCKY NEXT TIME. A FEDERAL RECALL
    NEEDS TO BE DONE FAST!!!!!!!!!! *TR
5
    1 Affected Product
6
7
    February 7, 2018 NHTSA ID NUMBER: 11067423
    Components: STEERING
8
    NHTSA ID Number: 11067423
9
    Incident Date February 6, 2018
    Consumer Location RINGWOOD, NJ
10
    Vehicle Identification Number 1FTSW21Y88E****
    Summary of Complaint
11
    CRASHNo
12
    FIRENo
    INJURIES0
13
    DEATHS0
    HAVE BEEN EXPERIENCING THE INFAMOUS "SUPER DUTY DEATH SHAKE" FOR
14
    SEVERAL YEARS NOW ....HAVE HAD DEALER INSPECT THE VEHICLE NUMEROUS
15
    TIMES TO NO AVAIL ....ALWAYS TOLD IT IS DUE TO TIRE PRESSURE OR WORN
    TIRES....I CHECK PRESSURES REGULARLY AND NEVER HAVE TO ADD MORE THAN A
16
    # OR TWO.....NEW TIRES MASK THE PROBLEM BUT IT IS STILL THERE......SEVERAL
    ENCOUNTERS HAVE NEARLY CAUSED ACCIDENTS....USUALLY HAPPENS AT HIGHWAY
17
    SPEED BUT OCCASIONALLY AT SPEEDS AS LOW AS 35 MPH.....VIOLENT OSCILLATION
18
    AT TIMES HAVE BEEN VERY DANGEROUS SITUATIONS ....THIS PROBLEM NEEDS TO BE
    RECTIFIED .....RECEIVED A "RECALL NOTICE RELATED TO THIS ISSUE ON 2/6/2018 ....WAS
19
    TOLD BY FORD ON 2/7/2018 THAT THEY HAVE NO PLANS TO FIX THIS DANGEROUS
    ISSUE
20
    1 Affected Product
21
22
    March 26, 2013 NHTSA ID NUMBER: 10504525
23
    Components: SUSPENSION, STEERING
    NHTSA ID Number: 10504525
24
    Incident Date December 7, 2010
    Consumer Location FORT WORTH, TX
25
    Vehicle Identification Number 1FTSW21R78E****
26
    Summary of Complaint
    CRASHNo
27
    FIRENo
    INJURIES0
28
    DEATHS0
                                         -302-
    Class Action Complaint
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BEGAN IN 2010...DEATH WOBBLE....HITTING A BUMP, STEERING WHEEL SHAKES 1 VIOLENTLY.....LOSS OF CONFIDENCE IN THE ABILITY OF THE VEHICLE TO PROVIDE 2 SAFE TRANSPORTATION.....DEALERSHIP VISIT WAS NOT HELPFUL...SAID IT WAS TIRE PRESSURE...ADDED A DIFFERENT TRAC BAR IN 2012...HELPED SOME BUT TIL 3 PRODUCES THE WOBBLE AT LOWER SPEEDS. *TR 4 **1 Affected Product** 5 December 6, 2018 NHTSA ID NUMBER: 11156683 6 **Components: STEERING** 7 NHTSA ID Number: 11156683 **Incident Date** November 7, 2018 8 Consumer Location LAKE GENEVA, WI 9 Vehicle Identification Number 1FT7W2BT8HE**** **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** WHILE DRIVING AT NORMAL HIGHWAY SPEEDS IN NORMAL DRIVING CONDITIONS 13 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 REPLACED THE STEERING STABILIZER. THE PROBLEM RETURNED RIGHT AWAY. 16 THE TRUCK IS SCHEDULED FOR REPAIR AGAIN DEC 17 2018 **1 Affected Product** 17 18 July 24, 2017 NHTSA ID NUMBER: 11010308 19 **Components: SUSPENSION** NHTSA ID Number: 11010308 20 **Incident Date** February 15, 2015 21 Consumer Location COLORADO SPRINGS, CO Vehicle Identification Number 1FT8W3BT0DE**** 22 **Summary of Complaint** CRASHNo 23 **FIRENo** 24 **INJURIES0 DEATHS0** 25 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 CONTACT STATED THAT THE STEERING WHEEL BECAME DIFFICULT TO MANEUVER 27 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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Class Action Complaint

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1
    FAILURE WAS DIAGNOSED AS THE (DEATH WOBBLE). THE BALL JOINTS, TRACKING
    BAR BUSHINGS, SPRING MOUTH, STEERING STABILIZER SHOCK, AND ALL FOUR
2
    TIRES NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE
    RECURRED. THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO
3
    TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS OFFERED.
4
    THE FAILURE MILEAGE WAS 53,000.
    1 Affected Product
5
6
    September 24, 2012 NHTSA ID NUMBER: 10476818
7
    Components: STEERING
    NHTSA ID Number: 10476818
8
    Incident Date June 12, 2012
    Consumer Location SEARCY, AR
9
    Vehicle Identification Number 1FT7W2BT8BE****
10
    Summary of Complaint
    CRASHNo
11
    FIRENo
12
    INJURIES0
    DEATHSO
13
    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
    VIOLENTLY. THE CONTACT MENTIONED THAT HE HAD TO DECELERATE SINCE THE
15
    VEHICLE FELT AS IF IT WAS GOING TO CRASH. THE VEHICLE WAS TAKEN TO THE
    DEALER WHO STATED THAT THE STEERING STABILIZER SHOCK NEEDED TO BE
16
    REPLACED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE
    MANUFACTURER WAS MADE AWARE OF THE FAILURE WHO DID NOT OFFER ANY
17
    ASSISTANCE. THE FAILURE MILEAGE WAS 23,000. UPDATED 10/31/12*LJ UPDATED
18
    10/31/12
    1 Affected Product
19
    1 Associated Document
20
21
    May 30, 2017 NHTSA ID NUMBER: 10992335
    Components: SUSPENSION, SERVICE BRAKES, HYDRAULIC
22
    NHTSA ID Number: 10992335
23
    Incident Date May 20, 2017
    Consumer Location BROOKEVILLE, MD
24
    Vehicle Identification Number 1FT7X2B69BE****
    Summary of Complaint
25
    CRASHNo
26
    FIRENo
    INJURIES0
27
    DEATHS0
    TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING OVER 60 MPH, THE
28
    VEHICLE SHOOK AND THE STEERING WHEEL LOCKED. WHILE THE BRAKE PEDAL WAS
                                        -304-
    Class Action Complaint
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DEPRESSED, THE VEHICLE SHOOK UNCONTROLLABLY. THERE WERE NO WARNING
 1
    INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO THE DEALER (KOONS
2
    SILVER SPRING FORD, 3111 AUTOMOBILE BLVD, SILVER SPRING, MD 20904 (301) 890-
    6100) WHERE IT WAS DIAGNOSED THAT THE BALL JOINT, BRAKE PADS, AND
3
    STABILIZER BAR NEEDED TO BE REPLACED. ALSO, FLUID WAS LEAKING ON THE
    SHOCKS AND THE STRUT NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED,
4
    BUT THE FAILURES RECURRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE
5
    FAILURES. THE FAILURE MILEAGE WAS 58,100.
    1 Affected Product
6
7
    February 8, 2013 NHTSA ID NUMBER: 10496896
8
    Components: SUSPENSION
9
    NHTSA ID Number: 10496896
    Incident Date July 9, 2011
10
    Consumer Location KENNARD, NE
    Vehicle Identification Number N/A
11
    Summary of Complaint
12
    CRASHNo
    FIRENo
13
    INJURIES0
    DEATHSO
14
    TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE
15
    DRIVING 40 MPH, THE FRONT END SHIMMERED SEVERELY WHEN THE VEHICLE HIT A
    BUMP. THE VEHICLE WAS TAKEN TO THE DEALER FOUR TIMES WHO REPLACED
16
    THE BALL JOINTS AND STABILIZER ARM BUT THE FAILURE RECURRED. THE
    MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 30,000 AND THE
17
    CURRENT MILEAGE WAS 68,000. THE VIN WAS UNAVAILABLE.
18
    1 Affected Product
19
20
    December 5, 2012 NHTSA ID NUMBER: 10487446
    Components: SUSPENSION
21
    NHTSA ID Number: 10487446
    Incident Date February 1, 2012
22
    Consumer Location MOUNTVILLE, PA
23
    Vehicle Identification Number 1FT7X2B64BE****
    Summary of Complaint
24
    CRASHNo
    FIRENo
25
    INJURIES0
26
    DEATHSO
    TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING
27
    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
28
    DEALER THREE TIMES FOR THE FAILURE. THE STEERING STABILIZER AND FRONT
                                        -305-
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Class Action Complaint

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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Sometimes Ford may offer a special adjustment program to pay all or part 1 of the cost of certain repairs beyond the terms of the applicable warranty. 2 3 The New Vehicle Limited Warranty and the Emissions Warranties described in this booklet apply to your vehicle if: 4 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 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. 8 9 10 You may have some implied warranties. For example, you may have an implied warranty of merchantability (that the car or light truck is 11 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

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 warranty mileage period.

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:

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

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 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			
32 11132857 5,800 33 11157006 <6,000	30	10190731	<5,000
33 11157006 <6,000	31	10575590	5,400
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	32	11132857	5,800
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 48 10411981 9,800 49 11073393 9,800 50 10265894 10,000 51 10215739 10,000 52 10185954 10,000 54 10199973 10,000 55 10660588 10,000 56 11133226 10,000 57 11122943 10,100	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 9,800 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	34	10267467	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 54 10199973 10,000 55 10660588 10,000 56 11133226 10,000 57 11122943 10,100	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	36	10499454	6,000
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	37	10253789	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	38	11092264	7,000
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	39	11120417	7,000
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	40	11157298	7,909
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	41	10236342	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	42	10257681	8,000
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	43	11156845	8,000
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	44	11132889	8,200
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	45	11164678	8,500
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	46	10552681	9,000
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	47	10511730	9,000
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	48	10411981	9,800
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	49	11073393	9,800
52 10185954 10,000 53 10281566 10,000 54 10199973 10,000 55 10660588 10,000 56 11133226 10,000 57 11122943 10,100	50	10265894	10,000
53 10281566 10,000 54 10199973 10,000 55 10660588 10,000 56 11133226 10,000 57 11122943 10,100	51	10215739	10,000
54 10199973 10,000 55 10660588 10,000 56 11133226 10,000 57 11122943 10,100	52	10185954	10,000
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56 11133226 10,000 57 11122943 10,100	54	10199973	10,000
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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	116	10268431	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	117	10576849	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	118	10363678	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	119	11092739	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	120	11013478	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	121	10664333	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	122	11163834	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	123	11118215	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	124	11163559	20,000
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129 10222609 21,977 130 10680495 22,000 131 10247920 22,065 132 10474424 <22,193	127	11141552	21,000
130 10680495 22,000 131 10247920 22,065 132 10474424 <22,193	128	11154687	21,500
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22	166	10351350	26,000
23	167	10465237	<26,505
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Out-of-Warranty			
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236	10362825	39,600	
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238	10838113	<40,000	
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242	10207387	40,000	
243	10347488	40,000	
244	10417674	40,000	
245	10336687	40,000	
246	10339629	40,000	
247	10350306	40,000	

248	10614915	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
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275	11014891	<50,000
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284	11123269	50,000
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325		68,000
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333	10593575	73,000
334	10557407	73,500
335	10286250	75,000
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346	11101683	80,000
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1	362	10241025	93,000
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	364	10558024	95,000
3	365	10495353	97,000
4	366	10376343	98,000
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	375	11164915	100,697
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13	378	10946144	117,500
	379	10327797	119,091
14	380	10731516	120,000

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381	10734536	123,000
382	10794821	<124,000
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384	10863336	127,000
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387	11120681	130,000
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390	11076502	154,000
391	10731192	159,000
392	10872235	180,000
393	11150428	186,000
394	11071768	190,000
395	10929658	200,000
396	11003164	225,000
397	10500801	294,000
		•

- 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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Components: STEERING
 1
    NHTSA ID Number: 11164915
2
    Incident Date December 8, 2018
    Consumer Location LA PORTE, TX
3
    Vehicle Identification Number 1FT7W2BT1KE****
4
    Summary of Complaint
    CRASHNo
5
    FIRENo
    INJURIES0
6
    DEATHS0
7
    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
8
    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,
9
    TX 77590, (409)-948-2541) WHERE IT WAS DIAGNOSED THAT THE VEHICLE BUMP
10
    STEERED, WHICH OCCURRED AT HIGH SPEEDS OVER A BUMP. THE VEHICLE WAS
    REPAIRED, BUT THE FAILURE RECURRED. THE MANUFACTURER WAS MADE WARE
11
    OF THE FAILURE AND OFFERED THE CONTACT AN EXTENDED WARRANTY FOR
    SEVEN YEARS. THE FAILURE MILEAGE WAS 100,697.
12
    1 Affected Product
13
14
    December 26, 2018 NHTSA ID NUMBER: 11163498
15
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 11163498
16
    Incident Date November 18, 2018
    Consumer Location WESTON, CO
17
    Vehicle Identification Number 1FT7W2BT3HE****
18
    Summary of Complaint
    CRASHNo
19
    FIRENo
20
    INJURIES0
    DEATHSO
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
    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
    THAT THE SAME FAILURE OCCURRED MULTIPLE TIMES WHENEVER THE SPEED
24
    EXCEEDED 60-75 MPH. THE VEHICLE WAS TAKEN TO PHIL LONG FORD (301 S 2ND ST,
    RATON, NM 87740) AND UNKNOWN REPAIRS WERE PERFORMED. A MONTH AFTER
25
    TAKING THE VEHICLE TO THE DEALER, THE FAILURE RECURRED. THE
    MANUFACTURER WAS NOT CONTACTED. THE VEHICLE WAS NOT DIAGNOSED OR
26
    REPAIRED. THE FAILURE MILEAGE WAS 17,000.
27
    1 Affected Product
28
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-314-

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

1 2 August 29, 2018 NHTSA ID NUMBER: 11123269 Components: STRUCTURE, STEERING, SUSPENSION 3 NHTSA ID Number: 11123269 4 **Incident Date June 1, 2016** Consumer Location DAMASCUS, MD 5 Vehicle Identification Number 1FT7X3B66EE**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** 9 TL* THE CONTACT OWNS A 2014 FORD F-350. WHILE DRIVING 25 MPH, THE FRONT END OF THE VEHICLE SHIMMIED. THE VEHICLE HAD TO BE RESTARTED TO GAIN CONTROL. 10 THERE WERE NO WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO SHEEHY PERFORMANCE CENTER (600 N FREDERICK AVE, GAITHERSBURG, MD 20877, 11 (301) 548-9132) WHERE IT WAS DIAGNOSED THAT THE BALL JOINTS, TIE ROD, SHOCKS, 12 AND THE TIRES NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED. THE MANUFACTURER WAS CONTACTED AND PROVIDED 13 CASE NUMBER: 12943941. THE FAILURE MILEAGE WAS 50,000. **1 Affected Product** 14 15 July 24, 2017 NHTSA ID NUMBER: 11010308 16 **Components: SUSPENSION** 17 NHTSA ID Number: 11010308 **Incident Date** February 15, 2015 18 Consumer Location COLORADO SPRINGS, CO Vehicle Identification Number 1FT8W3BT0DE**** 19 **Summary of Complaint CRASHNo** 20 **FIRENo** 21 **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 CONTACT STATED THAT THE STEERING WHEEL BECAME DIFFICULT TO MANEUVER 24 WHEN THE SHAKING OCCURRED AND THE CHECK ENGINE WARNING INDICATOR ILLUMINATED. THE VEHICLE WAS TAKEN TO PHIL LONG FORD OF MOTOR CITY (1212 25 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 RECURRED. THE MANUFACTURER WAS NOTIFIED AND ADVISED THE CONTACT TO 28 -316-

Class Action Complaint

TAKE THE VEHICLE BACK TO THE DEALER. NO FURTHER ASSISTANCE WAS 1 **OFFERED.** THE FAILURE MILEAGE WAS 53,000. 2 **1 Affected Product** 3 4 April 18, 2018 NHTSA ID NUMBER: 11088792 **Components: SUSPENSION, WHEELS** 5 NHTSA ID Number: 11088792 **Incident Date** April 18, 2018 6 Consumer Location GREENVIEW, IL 7 Vehicle Identification Number 1FT7W2BT7DE**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHS0** TL* THE CONTACT OWNS A 2013 FORD F-250. WHILE DRIVING ABOVE 40 MPH OVER A 11 BUMP IN THE ROAD, THE VEHICLE SHOOK AND THE FRONT OF THE VEHICLE BECAME 12 DIFFICULT TO CONTROL. THERE WERE NO WARNING INDICATORS ILLUMINATED BEFORE OR AFTER THE FAILURE. THE VEHICLE WAS TAKEN TO LANDMARK FORD (2401 13 PRAIRIE CROSSING DR., SPRINGFIELD, IL 62711) FOR DIAGNOSTIC TESTING AND REPAIRS. THE CONTACT WAS UNABLE TO RECALL WHAT WAS DIAGNOSED AND 14 REPAIRED. THE CONTACT STATED THAT THE VEHICLE WAS REPAIRED, BUT THE 15 FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 60,000. 16 **1 Affected Product** 17 18 July 26, 2016 NHTSA ID NUMBER: 10888734 Components: SUSPENSION, SERVICE BRAKES, HYDRAULIC 19 NHTSA ID Number: 10888734 20 Incident Date November 20, 2015 **Consumer Location MANVEL, TX** 21 Vehicle Identification Number 1FT7W2BT3DE**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** TL* THE CONTACT OWNS A 2013 FORD F-250. WHILE DRIVING APPROXIMATELY 60 MPH, 25 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 THE DEALER WHERE IT WAS DIAGNOSED THAT THE WHEELS AND ROTORS WERE THE 27 CAUSE OF THE WOBBLE AND NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED. BUT THE FAILURE RECURRED. THE VEHICLE WAS TAKEN BACK TO THE DEALER 28 WHERE IT WAS DIAGNOSED THAT THE VEHICLE LOST COMPONENTS THAT NEEDED TO -317-

Class Action Complaint

BE TIGHTENED. THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE 1 PERSISTED. THE CONTACT STATED THAT THE VEHICLE WAS TAKEN BACK TO THE 2 DEALER AGAIN, BUT THE CAUSE OF THE FAILURE COULD NOT BE DETERMINED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE 3 FAILURE MILEAGE WAS 100,000. ... UPDATED 08/23/16 *BF 4 1 Affected Product **1 Associated Document** 5 6 January 18, 2017 NHTSA ID NUMBER: 10946144 7 **Components: STEERING** NHTSA ID Number: 10946144 8 Incident Date December 20, 2016 9 **Consumer Location PASADENA, TX** Vehicle Identification Number 1FT7W2BT8CE**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 TL* THE CONTACT OWNS A 2012 FORD F-250. THE CONTACT STATED THAT WHILE DRIVING AT APPROXIMATELY 45 MPH AND HIT A BUMP, THE STEERING WHEEL SHOOK. 14 AS A RESULT, THE CONTACT REDUCED THE VEHICLE IN SPEED IN ORDER TO AVOID A 15 CRASH. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO REPLACED THE TRACK BAR HOWEVER, THE FAILURE RECURRED. THE FAILURE 16 WAS NOT REMEDIED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 117,500. 17 1 Affected Product 18 19 January 26, 2016 NHTSA ID NUMBER: 10822406 Components: SUSPENSION, STEERING 20 NHTSA ID Number: 10822406 21 **Incident Date June 25, 2012** Consumer Location HELLAM, PA 22 Vehicle Identification Number 1FT7W2BT6CE**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 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. THE FAILURE 27 OCCURRED CONSTANTLY. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS DIAGNOSED THAT THE DRAG LINK AND THE BALL JOINTS NEEDED TO BE 28 REPLACED. THE VEHICLE ALSO NEEDED A FRONT END ALIGNMENT. THE REPAIRS -318-Class Action Complaint

WERE DONE; HOWEVER, THE FAILURE RECURRED. THE MANUFACTURER WAS NOT 1 MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 3,000. 2 1 Affected Product 3 4 February 28, 2013 NHTSA ID NUMBER: 10500801 **Components: STEERING** 5 NHTSA ID Number: 10500801 **Incident Date** January 2, 2013 6 Consumer Location POCOMOKE CITY, MD 7 Vehicle Identification Number 1FT8W3BTXBE**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHS0** 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 WAS TAKEN TO A DEALER FOR DIAGNOSIS WHERE THE U-BOLTS WERE REPLACED 13 BUT THE FAILURE RECURRED. THE VEHICLE WAS THEN TAKEN TO AN INDEPENDENT MECHANIC WHERE THE STEERING SHOCK ABSORBER WAS 14 REPLACED HOWEVER, THE FAILURE RECURRED. THE TORQUE BAR AND THE TWO 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 FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE 17 WOBBLE WAS NORMAL AND OFFERED NO OTHER ASSISTANCE. THE VEHICLE WAS 18 NOT FURTHER REPAIRED. THE FAILURE MILEAGE WAS 294,000 AND THE CURRENT MILEAGE WAS 315,000. 19 1 Affected Product 20 21 August 17, 2012 NHTSA ID NUMBER: 10471247 **Components: STEERING** 22 NHTSA ID Number: 10471247 23 **Incident Date July 17, 2011** Consumer Location THOUSAND OAKS, CA 24 Vehicle Identification Number 1FDRF3GT6BE**** **Summary of Complaint** 25 **CRASHNo** 26 **FIRENo INJURIES0** 27 **DEATHS0** TL* THE CONTACT OWNS A 2011 FORD F350 SD. THE CONTACT STATED THAT HE 28 NOTICED BOTH FRONT TIRES EXHIBITED AN IRREGULAR WEAR PATTERN IN THE -319-Class Action Complaint

EXACT SAME PLACE. THE VEHICLE WAS TAKEN TO THE DEALER WHO ALIGNED 1 THE TIRES BUT THE FAILURE PERSISTED. THE MANUFACTURER WAS NOTIFIED 2 AND A CLAIM WAS FILED (CLAIM NUMBER 1512842141) BUT IT WAS DENIED BY THE MANUFACTURER WHO OFFERED NO ASSISTANCE. THE FAILURE MILEAGE WAS 3 2,000 AND THE CURRENT MILEAGE WAS 20,000. 4 1 Affected Product 5 January 27, 2014 NHTSA ID NUMBER: 10561609 6 Components: SUSPENSION, STEERING 7 NHTSA ID Number: 10561609 **Incident Date** January 27, 2012 8 Consumer Location SAN ANTONIO, TX 9 Vehicle Identification Number 1FT8W3DT2BE**** **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** 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 THE BRAKES TO SLOW THE VEHICLE DOWN AND THE SHAKING SUBSIDED. THE 14 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 JOINTS, STEERING AND TIE ROD ENDS WERE ALL REPLACED. THE TIRES ON THE 16 VEHICLE WERE REPLACED AND BALANCED BUT THE FAILURE RECURRED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE 17 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 CONSUMER HAD NUMEROUS COMPONENTS REPLACED, BUT TO NO AVAIL. THE 19 DEALER INFROMED THE CONSUMER THE OSCILLATION WAS NORMAL. **1 Affected Product** 20 21 October 2, 2015 NHTSA ID NUMBER: 10779305 22 **Components: WHEELS, STEERING** 23 NHTSA ID Number: 10779305 Incident Date November 28, 2014 24 Consumer Location FAIRBANKS, IN Vehicle Identification Number 1FT7W2BT1BE**** 25 **Summary of Complaint** 26 **CRASHNo FIRENo** 27 **INJURIES0 DEATHSO** 28 -320-

Class Action Complaint

1 TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING AT APPROXIMATELY 50 MPH, THE VEHICLE VIBRATED VIOLENTLY WITHOUT WARNING. THE FAILURE 2 RECURRED INTERMITTENTLY. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHERE THE TIRE SHOCKS, VIBRATION DAMPENER, DRAG LINK, TIE 3 ROD, AND ALL THE TIRES WERE REPLACED; HOWEVER, THE FAILURE RECURRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE 4 FAILURE MILEAGE WAS 50,000. 5 **1 Affected Product** 6 7 March 3, 2014 NHTSA ID NUMBER: 10566852 **Components: STEERING** 8 **NHTSA ID Number:** 10566852 9 Incident Date February 22, 2014 Consumer Location PUYALLUP, WA 10 Vehicle Identification Number 1FT7X2BT1BE**** **Summary of Complaint** 11 **CRASHNo** 12 **FIRENo INJURIES0** 13 **DEATHS0** TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE 14 DRIVING 60 MPH, THE VEHICLE BEGAN SHAKING ABNORMALLY. THE CONTACT TOOK 15 THE VEHICLE TO THE DEALER, WHO STATED THAT THEY WOULD BALANCE ALL FOR TIRES AND PERFORMED AND ALIGNMENT CHECK. THE VEHICLE WAS 16 REPAIRED HOWEVER, THE PROBLEM PERSISTED. THE MANUFACTURER WAS NOT CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS 22,500. *TR 17 1 Affected Product 18 19 February 12, 2013 NHTSA ID NUMBER: 10497898 **Components: STEERING** 20 NHTSA ID Number: 10497898 21 **Incident Date** February 11, 2013 Consumer Location WEST GROVE, PA 22 Vehicle Identification Number 1FT7X2BT0BE**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 TL* THE CONTACT OWNS A 2011 FORD F-250 SUPER DUTY. THE CONTACT STATED THAT WHILE DRIVING 65 MPH, THE STEERING WHEEL BEGAN TO SHAKE ABNORMALLY. THE 27 FAILURE PROGRESSED UNTIL THE SHAKING BECAME VIOLENT. THE VEHICLE WAS TAKEN AN INDEPENDENT MECHANIC WHERE THE WHEELS WERE BALANCED 28 HOWEVER, THE FAILURE RECURRED. THE CONTACT MADE ARRANGEMENTS FOR -321-Class Action Complaint

1 THE VEHICLE TO BE DIAGNOSED BY A DEALER. THE VEHICLE WAS NOT REPAIRED. THE FAILURE AND CURRENT MILEAGE WAS 46,000. 2 1 Affected Product 3 4 November 21, 2012 NHTSA ID NUMBER: 10485416 **Components: STEERING** 5 NHTSA ID Number: 10485416 **Incident Date** October 18, 2012 6 Consumer Location WASHINGTON, IL 7 Vehicle Identification Number N/A **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHSO** 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. FORD PUT A NEW STEERING DAMPER IN AND THE 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. HOPEFULLY THIS STOPS THE PROBLEM AND FORD WILL REIMBURSE ME SOME OF THE 14 COST. *TR 15 **1 Affected Product** 16 September 24, 2012 NHTSA ID NUMBER: 10476818 17 **Components: STEERING** 18 NHTSA ID Number: 10476818 **Incident Date June 12, 2012** 19 **Consumer Location SEARCY, AR** Vehicle Identification Number 1FT7W2BT8BE**** 20 **Summary of Complaint** 21 **CRASHNo FIRENo** 22 **INJURIES0** 23 **DEATHS0** TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE 24 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 25 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 ASSISTANCE. THE FAILURE MILEAGE WAS 23,000. UPDATED 10/31/12*LJ UPDATED 28 10/31/12 -322-Class Action Complaint

1 Affected Product 1 1 Associated Document 2 3 August 28, 2012 NHTSA ID NUMBER: 10472738 4 **Components: STEERING** NHTSA ID Number: 10472738 5 **Incident Date** August 1, 2011 Consumer Location HOUSTON, TX 6 Vehicle Identification Number 1FT7W2BT9BE**** 7 **Summary of Complaint CRASHNo** 8 **FIRENo** 9 **INJURIES0 DEATHS0** 10 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 11 CONTACT WAITED UNTIL THE SHAKING CEASED INDEPENDENTLY HOWEVER, THE 12 FAILURE RECURRED FREQUENTLY. THE VEHICLE WAS TAKEN TO THE DEALER WHO ADVISED THAT THE FAILURE WAS CAUSED BY THE TIRES AND 13 RECOMMENDED HAVING A FRONT END ALIGNMENT PERFORMED. THE CONTACT STATED THAT ALL FOUR TIRES WERE REPLACED AND AN ALIGNMENT WAS 14 PERFORMED HOWEVER, THE FAILURE PERSISTED. THE MANUFACTURER WAS NOT 15 MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 10. THE CURRENT MILEAGE WAS 31,000. 16 1 Affected Product 17 18 July 5, 2017 NHTSA ID NUMBER: 11003164 Components: SUSPENSION, WHEELS 19 NHTSA ID Number: 11003164 20 **Incident Date** April 3, 2017 Consumer Location BAKERSFIELD, CA 21 Vehicle Identification Number 1FT7W2BT6BE**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH OVER A BUMP IN 25 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 VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND THE LOCAL DEALER (JIM 27 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 28 REPLACE ALL FOUR TIRES. ALL FOUR TIRES WERE REPLACED, BUT THE ISSUE -323-

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PERSISTED. THE MANUFACTURER WAS NOTIFIED AND REFERRED THE CONTACT 1 TO NHTSA. THE FAILURE MILEAGE WAS 225,000. 2 **1 Affected Product** 3 4 June 27, 2017 NHTSA ID NUMBER: 11001691 Components: SUSPENSION, STEERING 5 NHTSA ID Number: 11001691 **Incident Date June 15, 2013** 6 **Consumer Location VICTORIA, TX** 7 **Vehicle Identification Number** 1FT7W2BT4BE**** **Summary of Complaint** 8 **CRASHNo FIRENo** 9 **INJURIES0** 10 **DEATHS0** TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING 60 MPH, THE VEHICLE 11 WOBBLED AND SHOOK VIOLENTLY. THE VEHICLE WAS TAKEN TO THE DEALER (MAC 12 HAIK FORD LINCOLN HYUNDAI 4506 N NAVARRO ST, VICTORIA, TX 77904), BUT THE DEALER WAS UNABLE TO DUPLICATE THE FAILURE. THE DEALER REPLACED 13 UNKNOWN PARTS ON THE FRONT END OF THE VEHICLE, BUT THE FAILURE RECURRED SEVERAL MORE TIMES. THE MANUFACTURER STATED THAT THE 14 CONTACT SHOULD TAKE THE VEHICLE TO A DEALER AND HAVE IT DIAGNOSED. 15 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**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** TL* THE CONTACT OWNS A 2011 FORD F-250. WHILE DRIVING OVER 60 MPH, THE 25 VEHICLE SHOOK AND THE STEERING WHEEL LOCKED. WHILE THE BRAKE PEDAL WAS 26 DEPRESSED, THE VEHICLE SHOOK UNCONTROLLABLY. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE VEHICLE WAS TAKEN TO THE DEALER (KOONS 27 SILVER SPRING FORD, 3111 AUTOMOBILE BLVD, SILVER SPRING, MD 20904 (301) 890-6100) WHERE IT WAS DIAGNOSED THAT THE BALL JOINT, BRAKE PADS, AND 28 STABILIZER BAR NEEDED TO BE REPLACED. ALSO, FLUID WAS LEAKING ON THE -324-

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SHOCKS AND THE STRUT NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, 1 BUT THE FAILURES RECURRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE 2 FAILURES. THE FAILURE MILEAGE WAS 58,100. **1 Affected Product** 3 4 December 2, 2016 NHTSA ID NUMBER: 10929658 5 **Components: SUSPENSION NHTSA ID Number:** 10929658 6 **Incident Date** August 5, 2016 7 Consumer Location SOUTH HAVEN, MI Vehicle Identification Number 1FT7W2BT0BE**** 8 **Summary of Complaint CRASHNo** 9 **FIRENo** 10 **INJURIES0 DEATHS0** 11 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 REPLACED OR REPAIRED BY THE DEALER, BUT THE FAILURE PERSISTED. THE 15 MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 200,000. 16 **1 Affected Product** 17 18 July 2, 2014 NHTSA ID NUMBER: 10607693 Components: SUSPENSION, STEERING 19 **NHTSA ID Number:** 10607693 **Incident Date** May 14, 2014 20 Consumer Location MULDROW, OK 21 Vehicle Identification Number 1FT7X2BTXBE**** **Summary of Complaint** 22 **CRASHNo** 23 **FIRENo INJURIES0** 24 **DEATHSO** TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT STATED THAT WHILE 25 DRIVING AT 60 MPH ON UNEVEN ROAD PAVEMENT, THE VEHICLE STARTED TO 26 VIBRATE. THE CONTACT ALSO STATED THAT HE REDUCED THE SPEED TO 10 MPH, THE VIBRATION STOPPED. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS 27 DIAGNOSED THAT ALL FOUR TIRES NEEDED TO BE REPLACED AND BALANCED. THE TECHNICIAN ALSO ALIGNED BOTH FRONT DRIVERS AND PASSENGERS SIDE 28 TIRES. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE VEHICLE -325-Class Action Complaint

WAS TAKEN TO THE DEALER AGAIN BUT THE FAILURE WAS UNABLE TO BE 1 **DUPLICATED.** THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE 2 APPROXIMATE FAILURE MILEAGE WAS 30,000. **1 Affected Product** 3 4 February 8, 2013 NHTSA ID NUMBER: 10496896 5 **Components: SUSPENSION NHTSA ID Number:** 10496896 6 **Incident Date** July 9, 2011 7 Consumer Location KENNARD, NE Vehicle Identification Number N/A 8 **Summary of Complaint CRASHNo** 9 **FIRENo** 10 **INJURIES0 DEATHS0** 11 TL* THE CONTACT OWNS A 2011 FORD F-250. THE CONTACT STATED THAT WHILE 12 DRIVING 40 MPH, THE FRONT END SHIMMERED SEVERELY WHEN THE VEHICLE HIT A BUMP. THE VEHICLE WAS TAKEN TO THE DEALER FOUR TIMES WHO REPLACED 13 THE BALL JOINTS AND STABILIZER ARM BUT THE FAILURE RECURRED. THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 30,000 AND THE 14 CURRENT MILEAGE WAS 68,000. THE VIN WAS UNAVAILABLE. 15 1 Affected Product 16 December 5, 2012 NHTSA ID NUMBER: 10487446 17 **Components: SUSPENSION** 18 NHTSA ID Number: 10487446 **Incident Date** February 1, 2012 19 Consumer Location MOUNTVILLE, PA Vehicle Identification Number 1FT7X2B64BE**** 20 **Summary of Complaint** 21 **CRASHNo FIRENo** 22 **INJURIES0** 23 **DEATHS0** TL* THE CONTACT OWNS A 2011 FORD F-250 SD. THE CONTACT WAS DRIVING 24 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 25 DEALER THREE TIMES FOR THE FAILURE. THE STEERING STABILIZER AND FRONT END SHOCKS WERE REPLACED AT DIFFERENT TIMES. THE FAILURE RECURRED 26 AFTER THE REPAIRS WERE PERFORMED WHENEVER DRIVING OVER A ROAD BUMP 27 OR POTHOLE. THE MANUFACTURER WAS NOTIFIED OF THE PROBLEM. THE APPROXIMATE FAILURE MILEAGE WAS 28,848. 28 1 Affected Product -326-

Class Action Complaint

1 2 January 4, 2013 NHTSA ID NUMBER: 10491015 **Components: SUSPENSION** 3 NHTSA ID Number: 10491015 4 **Incident Date** September 5, 2012 Consumer Location YUKON, OK 5 Vehicle Identification Number 1FTSW2BR3AE**** **Summary of Complaint** 6 **CRASHNo** 7 **FIRENo INJURIES0** 8 **DEATHS0** 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 10 VEHICLE WAS TAKEN TO THE DEALER HOWEVER, THE TECHNICIAN WAS UNABLE TO DIAGNOSE THE FAILURE. AS A PRECAUTION, THE DEALER REPLACED THE 11 DUAL SHOCKS AND TIRES. THE MANUFACTURER WAS NOT MADE AWARE OF THE 12 FAILURE. THE FAILURE PERSISTED. THE FAILURE MILEAGE WAS 30,000 AND THE CURRENT MILEAGE WAS 46,000. 13 1 Affected Product 14 15 February 8, 2013 NHTSA ID NUMBER: 10496839 **Components: SUSPENSION** 16 NHTSA ID Number: 10496839 **Incident Date** September 12, 2012 17 Consumer Location RIVERTON, UT 18 Vehicle Identification Number 1FTWW31R99E**** **Summary of Complaint** 19 **CRASHNo** 20 **FIRENo INJURIES0** 21 **DEATHS0** TL* THE CONTACT OWNS A 2009 FORD F-350 SD. THE CONTACT STATED THAT WHILE 22 DRIVING 65 MPH, HE DROVE OVER A BUMP IN THE ROAD AND THE FRONT DRIVER SIDE 23 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 24 WAS CONFIRMED THAT THE FRONT HUB HAD SEIZED AND NEEDED TO BE REPLACED ALONG WITH THE GEAR BOX. THE TIRES, SHOCKS, AND DUAL 25 STABILIZERS WERE ALL REPLACED BUT THE FAILURE RECURRED SO THE DEALER 26 ADJUSTED THE STEERING GEAR BOX. THE CONTACT STATED THAT THE FAILURE WAS NOT REMEDIED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 27 75.000 AND THE CURRENT MILEAGE WAS 99.000. **1 Affected Product** 28 -327-

Class Action Complaint Case No.

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Class Action Complaint

1 Affected Product

Case No.

28

```
February 2, 2015 NHTSA ID NUMBER: 10680495
 1
    Components: SUSPENSION
2
    NHTSA ID Number: 10680495
    Incident Date January 15, 2015
3
    Consumer Location BOYDS, MD
4
    Vehicle Identification Number 1FTWX31R88E****
    Summary of Complaint
5
    CRASHNo
    FIRENo
6
    INJURIES0
7
    DEATHSO
    TL* THE CONTACT OWNS A 2008 FORD F-350. WHILE DRIVING 65 MPH OVER A POTHOLE,
8
    THE VEHICLE BEGAN TO VIBRATE VIOLENTLY. THE FAILURE RECURRED ON SEVERAL
    OCCASIONS. THE VEHICLE WAS TAKEN TO A DEALER, WHERE THE TRACK BAR
9
    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
    1 Associated Document
12
13
    February 6, 2018 NHTSA ID NUMBER: 11067314
14
    Components: STEERING, SUSPENSION
15
    NHTSA ID Number: 11067314
    Incident Date February 6, 2018
16
    Consumer Location NORFOLK, VA
    Vehicle Identification Number 1FTSW21R28E****
17
    Summary of Complaint
18
    CRASHNo
    FIRENo
19
    INJURIES0
20
    DEATHSO
    SINCE OWNING MY F250, IT HAS RANDOMLY EXPERIENCED A SEVERE VIBRATION
21
    "DEATH WOBBLE" AFTER HITTING BUMPS AT HIGHWAY SPEED. SO BAD, THAT I
    INSTALLED A STEERING STABILIZER TO HELP MITIGATE THE ISSUE (FORD DIDN'T
22
    SEEM TO HAVE A BETTER FIX). I ALWAYS KEEP MY LOAD "E "RATED TIRES
    INFLATED PER RECOMMENDED PRESSURES YET THE PROBLEM PERSISTED. ON
23
    SEVERAL OCCASIONS I THOUGHT THAT I WAS GOING TO LOSE CONTROL OF THE
24
    VEHICLE WHEN THE VIBRATIONS HAPPENED. FORD HAS YET TO ADDRESS THIS ISSUE
    OTHER THAN TO SAY SLOW DOWN WHEN THE SEVERE VIBRATION OCCURS. FOR
25
    NEARLY 10 YEARS THIS HAS BEEN AN ACCIDENT WAITING TO HAPPEN FOR MANY F250
    OWNERS AND FORD'S ANSWER IS WHEN IT HAPPENS," SLOW DOWN"? THIS IS NOT AN
26
    ISOLATED OCCURRENCE UNIQUE TO MY VEHICLE; THERE ARE LITERALLY THOUSANDS
27
    WHO HAVE EXPERIENCED THE ABOVE ISSUE. NUMEROUS POST, BLOGS AND VIDEOS
    ARE AVAILABLE ON LINE, YET FORD CONTINUES TO BLAME THE OCCURRENCE ON
28
    LOW TIRE PRESSURE AND PASS THE RESPONSIBILITY FOR CONTROLLING A VERY
                                        -329-
    Class Action Complaint
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HAZARDOUS "DEATH WOBBLE" TO THE VEHICLE OWNERS. THIS IS AN ISSUE THEY
 1
   HAVE KNOWN ABOUT FOR MANY YEARS, YET HAVE FAILED TO TAKE RESPONSIBILITY
2
   AND CORRECT THE HIGHLY DANGEROUS CONDITION FORD CREATED. ANY DATA ON
   HOW MANY ACCIDENTS CAN BE ATTRIBUTED TO THEIR POOR ENGINEERING/DESIGN
3
   ELEMENTS THAT OBVIOUSLY CONTRIBUTE TO THE UNSAFE HANDLING OF THEIR 7000
4
   LB PLUSS TRUCKS?
   1 Affected Product
5
6
   July 16, 2015 NHTSA ID NUMBER: 10734536
7
    Components: STEERING, ENGINE AND ENGINE COOLING
   NHTSA ID Number: 10734536
8
   Incident Date May 29, 2015
   Consumer Location CODEN, AL
9
    Vehicle Identification Number 1FTSW21R88E****
10
    Summary of Complaint
   CRASHNo
11
   FIRENo
12
   INJURIES0
   DEATHSO
13
   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
    THE RADIATOR TO EVENTUALLY BURST. THE FAILURE RECURRED MULTIPLE TIMES.
16
    THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO REPLACED THE
    TIRES AND PERFORMED AN ALL WHEEL ALIGNMENT; HOWEVER, THE FAILURE
17
   PERSISTED. THE MANUFACTURER INFORMED THE CONTACT THAT THE VIN WAS
18
    NOT INCLUDED IN ANY RECALLS. THE APPROXIMATE FAILURE MILEAGE WAS 123,000.
    1 Affected Product
19
20
    August 19, 2013 NHTSA ID NUMBER: 10536189
    Components: STEERING
21
    NHTSA ID Number: 10536189
   Incident Date July 16, 2013
22
    Consumer Location MORRISVILLE, MO
23
    Vehicle Identification Number 1FTSX21R18E****
   Summary of Complaint
24
   CRASHNo
   FIRENo
25
   INJURIES0
26
   DEATHS0
    TL* THE CONTACT OWNS A 2008 FORD F-250. THE CONTACT STATED THAT WHILE
27
    TRAVELING 60 MPH. THE STEERING WHEEL SHOOK VIOLENTLY. THE VEHICLE WAS
    TAKEN TO THE DEALER WHERE IT WAS FOUND THAT THE STEERING BOX HAD
28
    FAILED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE
                                        -330-
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Class Action Complaint

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Class Action Complaint

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1
   January 17, 2011 NHTSA ID NUMBER: 10376922
2
    Components: STEERING
    NHTSA ID Number: 10376922
3
   Incident Date December 17, 2010
4
    Consumer Location NORTH LAS VEGAS, NV
    Vehicle Identification Number 1FTNF21507E****
5
   Summary of Complaint
    CRASHNo
6
   FIRENo
7
   INJURIES0
   DEATHS0
8
   FORD SUPER DUTY DEATHWOBBLE. PROBLEM HAS PERSISTED SINCE NEW. FAILURE
   OCCURS AT SPEEDS BETWEEN 30 AND 75MPH. FAILURE MANIFESTS AS
9
   UNCONTROLLABLE STEERING AND WHOLE VEHICLE OSCILLATION. HAS LED TO LOSS
10
   OF CONTROL OF VEHICLE MORE TIMES THAN I CAN REMEMBER. UNEVEN ROAD
    SURFACE INSTIGATES SAID LOSS OF CONTROL. HAVE CHANGED SHOCKS AND
11
   SPRINGS, ADDED DUAL STEERING STABILIZER IN ADDITION TO CHANGING
   STABILIZER IN STOCK LOCATION, BALL JOINT CASTER CAMS ADDED, NEW TIRES
12
    ADDED (TWICE) MULTIPLE ALIGNMENTS. MOST CORRECTIVE ACTION TAKEN IS
13
    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
    Components: STEERING
17
    NHTSA ID Number: 10350306
18
   Incident Date November 8, 2008
    Consumer Location SHAMROCK, TX
19
    Vehicle Identification Number 1FTSX21527E****
   Summary of Complaint
20
    CRASHNo
21
   FIRENo
   INJURIES0
22
   DEATHSO
   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
    FAILURE BECAME WORSE. THE FAILURE OCCURRED WHEN ENCOUNTERING ROUGH
25
    ROAD CONDITIONS. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER ON
    THREE OCCASIONS AND ONE TIME TO AN INDEPENDENT MECHANIC REGARDING
26
    THE FAILURE. THE STEERING STABILIZER AND MOUNTING BRACKET WERE
27
    REPLACED FOUR TIMES YET THE FAILURE PERSISTED. THE CONTACT WAS IN THE
    PROCESS OF TAKING THE VEHICLE BACK TO THE AUTHORIZED DEALER FOR
28
                                        -332-
    Class Action Complaint
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FURTHER DIAGNOSIS AND REPAIRS. THE FAILURE MILEAGE WAS APPROXIMATELY 1 40,000. 2 1 Affected Product 3 4 October 23, 2008 NHTSA ID NUMBER: 10246512 **Components: STEERING** 5 NHTSA ID Number: 10246512 **Incident Date** March 2, 2008 6 **Consumer Location** ANACOCO. LA 7 **Vehicle Identification Number** 1FTSW21537E**** **Summary of Complaint** 8 **CRASHNo** 9 **FIRENo INJURIES0** 10 **DEATHSO** TL*THE CONTACT OWNS A 2007 FORD F-250. WHILE DRIVING APPROXIMATELY 60-65 11 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. A FEW MONTHS AFTER 13 THE FAILURE OCCURRED, THE DEALER REPLACED THE STEERING DAMPENER. SIX MONTHS AFTER THE REPAIR, THE FAILURES RECURRED. THE DEALER TEST 14 DROVE THE VEHICLE, BUT WERE UNABLE TO DUPLICATE THE FAILURE. THEY 15 STATED THAT NOTHING COULD BE DONE. THE CONTACT BELIEVES THAT THE VEHICLE SHOULD BE RECALLED. THE FAILURE MILEAGE WAS 17,000 AND CURRENT 16 MILEAGE WAS 21,995. UPDATED 11-25-08 *BF UPDATED 11/26/08. *JB 1 Affected Product 17 1 Associated Document 18 19 November 2, 2010 **NHTSA ID NUMBER: 10363770** 20 **Components: SUSPENSION** NHTSA ID Number: 10363770 21 **Incident Date** August 15, 2010 Consumer Location LOOMIS, CA 22 Vehicle Identification Number 1FTWW33P36E**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 TL* THE CONTACT OWNS A 2006 FORD F-350 SUPER DUTY. THE CONTACT WAS DRIVING APPROXIMATELY 60 MPH OVER A ROAD BUMP WHEN THE CONTACT LOST ALL 27 STEERING CONTROL. HE HAD TO DECREASE THE VEHICLES' SPEED TO 30 MPH TO REGAIN STEERING CONTROL. THE VEHICLE WAS TAKEN TO A LOCAL MECHANIC 28 WHERE THE STEERING BUSHING, SHOCKS, LOWER CONTROL, AND IDLER ARMS -333-Class Action Complaint

1 WERE REPLACED. THE FAILURE RECURRED WITHIN THREE WEEKS OF THE **REPAIRS.** THE CONTACT LOCATED AN INVESTIGATION (NHTSA ITEM NUMBER: 2 PE07057- SUSPENSION: FRONT) WHICH DESCRIBED FAILURE AND INQUIRED WITH THE DEALER. THE DEALER SET THE TIRE PRESSURE TO THE CORRECT MANUFACTURER'S 3 SPECIFICATIONS TO CORRECT THE FAILURE. THE FAILURE MILEAGE WAS 86,800 AND 4 THE CURRENT MILEAGE WAS 86,444. **1 Affected Product** 5 6 January 25, 2016 NHTSA ID NUMBER: 10822088 7 Components: STEERING, SUSPENSION NHTSA ID Number: 10822088 8 **Incident Date** February 28, 2005 Consumer Location ALBUQUERQUE, NM 9 Vehicle Identification Number 1FTWW33P26E**** 10 **Summary of Complaint CRASHNo** 11 **FIRENo** 12 **INJURIES0 DEATHSO** 13 TL* THE CONTACT OWNS A 2006 FORD F-350. WHILE DRIVING OVER A BUMP AT 35 MPH, THE VEHICLE VIBRATED VIOLENTLY. IN ADDITION, THE STEERING WHEEL ALSO 14 VIBRATED. THE FAILURE RECURRED ON NUMEROUS OCCASIONS. THE VEHICLE 15 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 PERSISTED. 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 **Components: STEERING, SUSPENSION** 20 NHTSA ID Number: 10576849 21 **Incident Date** April 2, 2008 Consumer Location HERMOSA BEACH, CA 22 Vehicle Identification Number 1FTWX31P66E**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 TL* THE CONTACT OWNS A 2006 FORD F-350. THE CONTACT STATED THAT THE SUSPENSION WAS UNSTABLE AND WOULD SHAKE WHILE THE VEHICLE WAS BEING 27 DRIVEN AROUND A CURVE OR AT VARIOUS SPEEDS SPORADICALLY. THE CONTACT TOOK THE VEHICLE TO THE DEALER FOR DIAGNOSTIC TESTING WHERE THE 28 DEALER REPLACED THE POWER STEERING HOSES AND THE STEERING STABILIZER -334-Class Action Complaint

HOWEVER, THE FAILURE PERSISTED. THE VEHICLE WAS THEN TAKEN TO AN 1 INDEPENDENT MECHANIC, WHO STATED THAT A CASTER ADJUSTMENT WOULD NEED 2 TO BE PERFORMED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE BUT DECLINED TO PROVIDE THE CONTACT A REMEDY 3 TO REPAIR THE VEHICLE. THE FAILURE MILEAGE WAS 20,000. 4 **1 Affected Product** 5 July 14, 2011 NHTSA ID NUMBER: 10412372 6 **Components: STEERING, SUSPENSION** 7 NHTSA ID Number: 10412372 **Incident Date July 14, 2011** 8 Consumer Location PORT ORANGE, FL 9 Vehicle Identification Number N/A **Summary of Complaint** 10 **CRASHNo FIRENo** 11 **INJURIES0** 12 **DEATHS0** 2006 FORD F350 EXPERIENCE EXTREMELY VIOLENT SHAKING WHEN DRIVING 45 PLUS 13 MPH AND HIT ANY TYPE BUMP. SHAKING IS SO VIOLENT STEERING IS NOT CAPABLE AND BRAKING ONLY MAKES SHAKING WORSE. I'VE CONTACTED DEALER AND THEY 14 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 AND IS STOCK MODEL. PLEASE HELP! *TR 17 **1 Affected Product** 18 19 January 26, 2012 **NHTSA ID NUMBER: 10445440 Components: STEERING** 20 **NHTSA ID Number:** 10445440 21 **Incident Date** May 2, 2011 **Consumer Location** Unknown 22 Vehicle Identification Number 1FTSX21516E**** 23 **Summary of Complaint CRASHNo** 24 **FIRENo INJURIES0** 25 **DEATHSO** 26 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 27 DEALER ATTEMPTED TO REPAIR THE VEHICLE, BUT THE FAILURE RECURRED, THE MANUFACTURER WAS NOTIFIED, BUT DENIED ANY ASSISTANCE WITH REPAIRS. 28 THE FAILURE MILEAGE WAS 37,000 AND THE CURRENT MILEAGE WAS 47,600. -335-

Class Action Complaint

1 Affected Product 1 2 September 21, 2011 NHTSA ID NUMBER: 10426658 3 **Components: STEERING** 4 **NHTSA ID Number:** 10426658 **Incident Date** September 18, 2011 5 Consumer Location EL CENTRO, CA Vehicle Identification Number 1FTSW21P96E**** 6 **Summary of Complaint** 7 **CRASHNo FIRENo** 8 **INJURIES0** 9 **DEATHSO** TL* THE CONTACT OWNS A 2006 FORD F-250 SD. THE CONTACT STATED THAT WHILE 10 DRIVING 70 MPH OVER SMALL ROAD BUMPS, HE LOST CONTROL OF THE STEERING. THE VEHICLE BEGAN TO VIOLENTLY SHAKE UNTIL THE CONTACT STOPPED THE 11 VEHICLE. THE FAILURE RECURRED WHENEVER THE CONTACT DROVE OVER ROAD 12 BUMPS AT HIGHWAY SPEEDS. THE VEHICLE WAS TAKEN TO AN AUTHORIZED DEALER WHERE THE CONTACT WAS INFORMED THAT THE FAILURE WAS A 13 COMMON OCCURRENCE. THE STEERING LINKAGES AND STEERING DAMPENER WERE REPAIRED. THE FAILURE RECURRED ONCE FOLLOWING REPAIRS. THE 14 FAILURE MILEAGE WAS 43,200. UPDATED 10/13/11 *BF UPDATED 01/12/12 15 **1 Affected Product** 1 Associated Document 16 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 Vehicle Identification Number 1FTWX31515E**** 21 **Summary of Complaint CRASHNo** 22 **FIRENo** 23 **INJURIES0 DEATHS0** 24 TL* THE CONTACT OWNS A 2005 FORD F-350 SD. THE CONTACT STATED THAT THE VEHICLE WOULD SHAKE VIOLENTLY WHILE DRIVING OVER 50 MPH. THE 25 MANUFACTURER WAS NOTIFIED OF THE FAILURE, BUT DENIED ANY ASSISTANCE WITH REPAIRS TO THE VEHICLE. THE CONTACT MADE ATTEMPTS TO REPAIR THE 26 FAILURE, BUT THE DEFECT CONTINUOUSLY RECURRED. THE FAILURE MILEAGE 27 WAS 45,000 AND THE CURRENT MILEAGE WAS 60,000. **1 Affected Product** 28 -336-

Class Action Complaint Case No.

```
1
    October 1, 2008 NHTSA ID NUMBER: 10244101
 2
    Components: STEERING, SUSPENSION
    NHTSA ID Number: 10244101
 3
    Incident Date January 20, 2006
 4
    Consumer Location DESOTO, MO
    Vehicle Identification Number 1FDWW37P25E****
 5
    Summary of Complaint
    CRASHNo
 6
    FIRENo
 7
    INJURIES0
    DEATHS0
 8
    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
 9
    JUMP ON THE OPPOSITE SIDE OF THE ROAD WHEN MAKING LEFT TURNS. THE DEALER
10
    STATED THAT BOLTS WERE MISSING AND THE SHOCK MOUNTS FAILED. THE
    VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED. HE RETURNED THE
11
    VEHICLE TO THE DEALER AND WAS INFORMED THAT THE TIRES NEEDED TO BE
    REPLACED. AFTER REPLACING THE TIRES, A FRONT STABILIZER WAS INSTALLED
12
    ON THE FRONT END OF THE VEHICLE; HOWEVER, THE FAILURE PERSISTED. THE
13
    VEHICLE HAS NOT BEEN REPAIRED SINCE THE LAST INCIDENT. THE MANUFACTURER
    STATED THAT THERE WERE NO RECALLS AND THEY WERE NOT LIABLE FOR THE
14
    REPAIRS. THE CURRENT MILEAGE WAS 61,635 AND FAILURE MILEAGE WAS 4,000.
    UPDATED 10/21/08. *JB
15
    1 Affected Product
16
    1 Associated Document
17
18
    February 9, 2010 NHTSA ID NUMBER: 10307928
    Components: SUSPENSION
19
    NHTSA ID Number: 10307928
    Incident Date August 10, 2009
20
    Consumer Location BOCA RATON, FL
21
    Vehicle Identification Number 1FTSW21P15E****
    Summary of Complaint
22
    CRASHNo
    FIRENo
23
    INJURIES0
24
    DEATHS0
    TL*THE CONTACT OWNS A 2005 FORD F250. WHILE DRIVING THE VEHICLE BEGAN TO
25
    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
26
    ROAD AND UNEVEN SURFACES. THE FORD DEALER WAS CONTACTED AND THEY
27
    ADVISED THE CONTACT TO HAVE AN ALIGNMENT PERFORMED AND TO ROTATE
    HIS TIRES WHICH DID NOT CORRECT THE FAILURE. HE ALSO HAD SHOCKS
28
    INSTALLED IN AN ATTEMPT TO CORRECT THE FAILURE; HOWEVER, THE FAILURE
                                        -337-
```

Class Action Complaint

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**
- 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

 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:

- 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

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 -340-

if the Members of the Class could afford such individual litigation, the court system could not. Individualized litigation presents a potential for inconsistent or contradictory judgments. Individualized litigation increases the delay and expense to all parties, and to the court system, presented by the complex legal and factual issues of the case. By contrast, the class action device presents far fewer 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 readily identified and notified based on, inter alia, Defendant's vehicle identification numbers, warranty 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:

- (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;
- (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
- (a)(9) Advertising goods and services with the intent not to sell them as advertised.
- 90. Defendant's unfair or deceptive acts or practices occurred repeatedly in Defendant's trade or business, were capable of deceiving a substantial portion of the purchasing public, and imposed a serious safety risk on the public.
- 91. Defendant knew that the Class Vehicles and steering-linkage and suspensions were defectively designed or manufactured, would fail prematurely, and were not suitable for their intended use.
- 92. Defendant was under a duty to Plaintiff and the Class Members to disclose the defective nature of the Class Vehicles and the Defect because:
 - 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;
 - 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;
 - 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
 - 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.
- 93. In failing to disclose the Defect and the associated safety risks and repair costs that result from it, Defendant has knowingly and intentionally concealed material facts and breached their duty to disclose.
- 94. The facts concealed or not disclosed by Defendant to Plaintiff and the Class Members are material in that a reasonable consumer would have considered them to be important in deciding whether to purchase Defendant's Class Vehicles or pay a lesser price. Had Plaintiff and the Class known about

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.
- 96. Plaintiff and the other Class Members' injuries were proximately caused by Defendant's 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

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.)

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

public to enter into any obligation relating thereto, to make or disseminate or cause to be made or disseminated . . . from this state before the public in any state, in any newspaper or other publication, or any advertising device, . . . or in any other manner or means whatever, including over the Internet, any 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."

- 111. Defendant caused to be made or disseminated through California and the United States, 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.
- 113. Plaintiff and the other Class Members have suffered an injury in fact, including the loss 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.
- 114. All of the wrongful conduct alleged herein occurred, and continues to occur, in the 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.
- 115. Plaintiff, individually and on behalf of the other Class Members, request that this Court 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 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 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.
- 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 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.
- 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.
- 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

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.

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)

- 133. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph 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 Warranty are "written warranties" within the meaning of 15 U.S.C. § 2301(6).
 - 139. Defendant breached the express warranties by:

- a. Selling and leasing Class Vehicles with suspensions/steering linkage system that were defective in materials and/or workmanship, requiring repair or replacement within the warranty period; and
- b. Refusing and/or failing to honor the express warranties by repairing or replacing, free of charge, the suspension or any of its component parts in order to remedy the Death Wobble.
- 140. Plaintiff and the other Class Members relied on the existence and length of the express warranties in deciding whether to purchase or lease the Class Vehicles.
- 141. Defendant's breach of the express warranties has deprived Plaintiff and the other Class Members of the benefit of their bargain.
- 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 (exclusive of interests and costs) computed on the basis of all claims to be determined in this suit.
- 143. Defendant has been afforded a reasonable opportunity to cure their breach of the written warranties and/or Plaintiff and the other Class Members were not required to do so because affording Defendant a reasonable opportunity to cure their breach of written warranties would have been futile. 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 sales data.
- 144. As a direct and proximate cause of Defendant's breach of the written warranties, Plaintiff and the other Class Members sustained damages and other losses in an amount to be determined at trial. Defendant's conduct damaged Plaintiff and the other Class Members, who are entitled to recover actual damages, consequential damages, specific performance, diminution in value, costs, including statutory attorney fees and/or other relief as deemed appropriate.

SEVENTH CAUSE OF ACTION

COMMON LAW FRAUDULENT CONCEALMENT

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

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

- 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.

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

162. Defendant's actions, as complained of herein, breached the implied warranty that the 1 2 Class Vehicles were of merchantable quality and fit for such use in violation of California Civil Code 3 §§ 1792 and 1791.1. IX 4 PRAYER FOR RELIEF 5 WHEREFORE, Plaintiff, on behalf of himself and Members of the Class, respectfully request that this Court: 6 7 determine that the claims alleged herein may be maintained as a class action under Rule a. 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 c. award all actual, general, special, incidental, statutory, punitive, and consequential 12 damages and restitution to which Plaintiff and the Class Members are entitled under Causes of Action 2 through 10, but award only restitution and injunctive relieve, pursuant 13 14 to California Civil Code § 1780, at this time; award pre-judgment and post-judgment interest on such monetary relief; 15 d. 16 grant appropriate injunctive and/or declaratory relief, including, without limitation, an e. 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. f. 21 award reasonable attorneys' fees and costs; and 22 grant such further relief that this Court deems appropriate. g. 23 Dated: June 10, 2019 24 Respectfully submitted, 25 26 /s/ David C. Wright By:___ David C. Wright 27 Richard D. McCune Mark I. Richards 28 -352-

McCune Wright Arevalo LLP

Class Action Complaint Case No.

SOHN & ASSOCIATES Douglas C. Sohn Attorneys for Plaintiff and Putative Class **JURY DEMAND** Plaintiff, on behalf of himself and the putative Class, demand a trial by jury on all issues so triable. McCune Wright Arevalo LLP By: /s/ David C. Wright David C. Wright Richard D. McCune Mark I. Richards SOHN & ASSOCIATES Douglas C. Sohn Attorneys for Plaintiff and Putative Class -353-Class Action Complaint Case No.

$_{\text{JS 44}}\text{ (Rev. 06/T)} \text{ Case 3:19-cv-01082-AJB-WVG-Document 1-1 Filed 06/10/19} \quad \text{PageID.354} \quad \text{Page 1 of 2}$

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I (a) PLAINTIFFS WILLIAM LESSIN, on be	half of himself and all		DEFENDANTS ed FORD MOTOR C	DEFENDANTS FORD MOTOR COMPANY, a Delaware corporation; and Does 1 through 10, inclusive als, Deputy Clerk		
(b) County of Residence of (E.	of First Listed Plaintiff SXCEPT IN U.S. PLAINTIFF CA	San Diego ISES)	County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.			
C) Attorneys (Firm Name, David C. Wright, Ståte Bar No. 17746 McCune Wright Arevalo, LLP 3281 East Guasti Road, Suite 100 Ontario, California 91761 Tel: (909) 557-1250	Address, and Telephone Numbe 8	r)	Attorneys (If Known)			
II. BASIS OF JURISDI	ICTION (Place an "X" in C	ne Box Only)	I. CITIZENSHIP OF P	RINCIPAL PARTIES	(Place an "X" in One Box for Plaintij	
☐ 1 U.S. Government Plaintiff	U.S. Government			TF DEF 1 1		
☐ 2 U.S. Government Defendant			Citizen of Another State	1 2		
			Citizen or Subject of a Foreign Country	1 3	□ 6 □ 6	
IV. NATURE OF SUIT	(Place an "X" in One Box Or	ıly)	Click here for: Nature of Suit Code Descriptions.			
CONTRACT		ORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
□ 110 Insurance □ 120 Marine □ 130 Miller Act □ 140 Negotiable Instrument □ 150 Recovery of Overpayment	□ 330 Federal Employers' Liability □ 340 Marine □ 345 Marine Product Liability □ 350 Motor Vehicle □ 355 Motor Vehicle □ 700 Product Liability □ 360 Other Personal Injury □ 362 Personal Injury - Medical Malpractice CIVIL RIGHTS □ 440 Other Civil Rights □ 441 Voting □ 442 Employment □ 443 Housing/ Accommodations □ 445 Amer. w/Disabilities - Employment □ 446 Amer. w/Disabilities - Other □ 448 Education	PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage Product Liability PRISONER PETITIONS Habeas Corpus: 463 Alien Detainee 510 Motions to Vacate Sentence 530 General 535 Death Penalty Other: 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detainee - Conditions of Confinement	□ 625 Drug Related Seizure of Property 21 USC 881 □ 690 Other □ 710 Fair Labor Standards Act □ 720 Labor/Management Relations □ 740 Railway Labor Act □ 751 Family and Medical Leave Act □ 790 Other Labor Litigation □ 791 Employee Retirement Income Security Act ■ IMMIGRATION □ 462 Naturalization Application □ 465 Other Immigration Actions	□ 422 Appeal 28 USC 158 □ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS □ 820 Copyrights □ 830 Patent □ 835 Patent - Abbreviated New Drug Application □ 840 Trademark SOCIAL SECURITY □ 861 HIA (1395ff) □ 862 Black Lung (923) □ 863 DIWC/DIWW (405(g)) □ 864 SSID Title XVI □ 865 RSI (405(g)) FEDERAL TAX SUITS □ 870 Taxes (U.S. Plaintiff or Defendant) □ 871 IRS—Third Party 26 USC 7609	□ 375 False Claims Act □ 376 Qui Tam (31 USC 3729(a)) □ 400 State Reapportionment □ 410 Antitrust □ 430 Banks and Banking □ 450 Commerce □ 460 Deportation □ 470 Racketeer Influenced and Corrupt Organizations □ 480 Consumer Credit □ 490 Cable/Sat TV □ 850 Securities/Commodities/ Exchange □ 890 Other Statutory Actions □ 891 Agricultural Acts □ 893 Environmental Matters □ 895 Freedom of Information Act □ 896 Arbitration □ 899 Administrative Procedure Act/Review or Appeal of Agency Decision □ 950 Constitutionality of State Statutes	
	moved from	Appellate Court	(specify	er District Litigation Transfer		
VI. CAUSE OF ACTIO	DN 28 U.S.C. 1332 of Brief description of ca	of the Class Action Fai	iling (<i>Do not cite jurisdictional sta</i> rness Act of 2005 onsumer Protection Statu			
VII. REQUESTED IN COMPLAINT:		IS A CLASS ACTION	DEMAND \$		if demanded in complaint: : ▼ Yes □ No	
VIII. RELATED CASI	E(S) (See instructions):	JUDGE		DOCKET NUMBER		
DATE 06/10/2019 FOR OFFICE USE ONLY		signature of attor /s/ David C. Wrigl				
	MOUNT	APPLYING IFP	JUDGE	MAG. JUI	DGE	

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- **I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

- III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.
- V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date. Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407

Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.

PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statue.

- VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless diversity. Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

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- I, Wiliam Lessin, hereby declare and state as follows:
- 1. I am over the age of 18 and Plaintiff in this action. The facts contained in this declaration are based on my personal knowledge and information and I have gathered that is available to me, and if called upon to do so, I could and would testify to the matters stated herein.
 - 2. I make this affidavit as required by California Civil Code section 1780(d)
- 3. The complaint in this action is filed in the proper place for trial of this action because Defendant Ford Motor Company does business in the Southern District of California and a substantial portion of the events, acts, and omissions that are subject to the claims in this matter occurred within the Southern District of California.

I declare under penalty of perjury under the laws of the State of California and the United States that the forgoing is true and correct.

Executed on June 10, 2019.

William Lessin

Min Lessin

Class Action Complaint Case No.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: Ford Hit with 'Death Wobble' Class Action Over Alleged Suspension, Steering Defects in F-250, F-350 Models