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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

PETER VELASCO, *et al.*,

Plaintiffs,

v.

CHRYSLER GROUP LLC,

Defendant.

Case No. 2:13-cv-08080-DDP (VBKx)

**CHRYSLER GROUP LLC'S
RESPONSE TO PLAINTIFFS' FIRST
SET OF INTERROGATORIES**

1 Chrysler Group LLC responds to Plaintiffs' First Set of Interrogatories as follows:

2 **PRELIMINARY STATEMENT**

3 Chrysler Group LLC objects to Plaintiffs' definitions to the extent they seek to
4 impose obligations with respect to discovery beyond those required by the applicable
5 statutes and rules of court, and to the extent they attempt to ascribe to certain words or
6 phrases meanings other than their customary and ordinary meanings. The responses set
7 forth herein are made solely for the purpose of this action. Each response is made subject
8 to all objections as to competence, materiality, relevance, or other objection as to
9 admissibility that may apply in the event that any such response, or the information
10 contained therein, is sought to be used in court. Chrysler Group LLC ("Chrysler Group")
11 expressly reserves all such objections.
12

13 **RESPONSE TO INTERROGATORIES**

14 **INTERROGATORY NO. 1:** Provide (separately for each model, model year, and
15 state) the number of new Class Vehicles sold or leased.

16 **RESPONSE NO. 1:** Chrysler Group will provide, under the protective order, a
17 spreadsheet that identifies the number of 2011 and 2012 Jeep Grand Cherokee (WK)
18 vehicles, 2011 and 2012 Dodge Durango (WD) vehicles, and 2011 and 2012 Dodge
19 Grand Caravan (RT) vehicles sold or leased domestically. The numbers will be broken
20 down by the model, model year, and state where the sale or lease occurred.
21

22 **INTERROGATORY NO. 2:** For each part number that corresponds to an original
23 equipment manufacturer ("OEM") TIPM in Class Vehicles, state:

- 24 a. The supplier's name;
- 25 b. The name and job title of each past or present responsible engineer, design
26 engineer, and supplier quality engineer;
- 27 c. The Chrysler vehicles, by make and model year, in which the TIPM is an
28 OEM part or replacement part; and

1 d. The corresponding identifiers or codes used in Chrysler databases, systems,
2 or software.

3 RESPONSE NO. 2:

- 4 a. Continental Automotive Guadalajara was the supplier of the TIPMs
5 assembled into the 2011 and 2012 Jeep Grand Cherokee (WK), Dodge
6 Durango (WD), and Dodge Grand Caravan (RT).
- 7 b. Chrysler Group refers Plaintiffs to the engineering drawings it agreed to
8 provide, under the protective order, in connection with its Initial
9 Disclosures, which identify the responsible engineers for the TIPMs
10 assembled into the 2011 and 2012 Jeep Grand Cherokee (WK), Dodge
11 Durango (WD), and Dodge Grand Caravan (RT).
- 12 c. The TIPM 7 was assembled into the 2011 and 2012 Jeep Grand Cherokee
13 (WK), the 2011 and 2012 Dodge Durango (WD), 2008 through 2014 RT-
14 body minivan, the 2007 through 2012 Dodge Nitro (KA), the 2008 through
15 2012 Jeep Liberty (KK), the 2010 through 2012 Dodge Ram 1500 (DS)
16 pickup, the 2010 through 2012 Dodge Ram 2500 (DJ) pickup, the 2011 and
17 2012 Dodge Ram 3500 (DD) Cab Chassis, the 2011 and 2012 Dodge Ram
18 4400/5500 (DP) Cab Chassis, the 2010 through 2012 Dodge Ram 3500
19 (D2) pickup, the 2007 through 2014 Jeep Wrangler (JK), and the 2008
20 through 2010 Dodge Journey (JC).
- 21 d. The TIPMs are identified by their part numbers. The part numbers for the
22 TIPMs that were assembled into the 2011 and 2012 Jeep Grand Cherokee
23 (WK), Dodge Durango (WD), and Dodge Grand Caravan (RT) are
24 identified on the engineering drawings that Chrysler Group agreed to
25 provide, under the protective order, as part of its Initial Disclosures.
26
27
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1 INTERROGATORY NO. 3: For each code or identifier that corresponds to a
2 potential or actual condition, issue, problem, or defect affecting the TIPM in Class
3 Vehicles, state:

- 4 a. A description of the condition, issue, problem, or defect; and
- 5 b. The Chrysler databases, systems, or software in which the code or identifier
6 can be used.

7 RESPONSE NO. 3: Chrysler Group objects to this interrogatory as argumentative
8 in its assumption that there is a “code or identifier that corresponds to a potential or
9 actual condition, issue, problem, or defect affecting” the TIPMs that were assembled
10 into the 2011 and 2012 Jeep Grand Cherokee (WK), Dodge Durango (WD), and Dodge
11 Grand Caravan (RT), which Chrysler Group denies. Accordingly, Chrysler Group does
12 not have information responsive to this interrogatory.
13

14 INTERROGATORY NO. 4: List each database, system, or software used to
15 store, query, or analyze:

- 17 a. Actual or anticipated failure or replacement rates;
- 18 b. Durability data;
- 19 c. Warranty data;
- 20 d. Part sales, replacements, or returns data;
- 21 e. Quality data, including quality defect data;
- 22 f. Condition, issue, problem, or defect occurrence rates;
- 23 g. Reports from suppliers about vehicle conditions, issues, problems, or
24 defects;
- 25 h. Component quality analysis team (CQAT) reports, summaries, or
26 memoranda;
- 27 i. Results, summaries, or reports of quality or problem solving methodologies,
28 such as Six Sigma, Shainin (Red X), or Kepner Tregoe;

- 1 j. Results, summaries, or reports of root cause analyses; and
2 k. Lessons learned relating to vehicle conditions, issues, problems, or defects.

3 RESPONSE NO. 4:

- 4 a. Chrysler Group does not have a database or system to track anticipated or
5 actual "failure rates" for a particular part or system in the ordinary course of
6 business. However, engineering groups and responsible engineers monitor
7 field reports, customer complaints, warranty and other post-sale data to
8 understand the performance of vehicles and their systems.
- 9 b. Durability testing is maintained in the PGTIS database. To the extent
10 component durability testing was done, such testing would typically be
11 conducted by the component supplier. If durability testing is conducted as
12 part of a root cause analysis, to the extent documents exist, they would be
13 maintained in the relevant files of the responsible engineers.
- 14 c. Warranty data is maintained in an enterprise database known as the Global
15 Warranty System ("GWS").
- 16 d. Chrysler Group's MOPAR division is responsible for the sale, demand, and
17 distribution of replacement or service parts to authorized dealers and sellers.
18 The database used to track these sales is called Mopar Parts.
- 19 e., f., h., i., and j. Chrysler Group does not have an enterprise-wide database or
20 system that warehouses the analysis or study of post-sale field data for
21 vehicles, system-level components or parts in the ordinary course of
22 business. However, in general, engineering groups and responsible
23 engineers monitor and sometimes analyze the field report data stored in
24 CAGRIS, the customer complaint data stored in the CAIR system, and/or
25 the warranty data stored in the GWS to understand the performance of
26 vehicles, system-level components, or parts. To the extent such data
27 analytics were performed, they may have been retained by engineering
28

1 groups and/or responsible engineers according to record retention
2 requirements and on file servers or other data storage areas assigned to the
3 group or individual.

4 Chrysler Group otherwise objects to sub-part (e) as vague in its use
5 of the term “quality defect data.”

- 6 g. Chrysler Group does not have an enterprise-wide database or system that
7 warehouses all information about vehicle issues or problems reported by
8 suppliers. Under certain circumstances, limited information about parts that
9 were returned under a claim of warranty are inspected by the supplier and
10 stored in the PRAS database. Otherwise, reports from suppliers about the
11 post-sale condition of the components or parts they supply would be in the
12 relevant files of the responsible engineering groups and/or responsible
13 engineers. Chrysler Group objects to Plaintiff’s definitions to the extent
14 they seek to impose obligations with respect to discovery beyond those
15 required by the applicable statutes and rules of court, and to the extent they
16 attempt to ascribe to certain words or phrases meanings other than their
17 customary and ordinary meanings.
- 18 k. Chrysler Group does not maintain a system or database containing
19 documents related to “[l]essons learned relating to vehicle conditions,
20 issues, problems, or defects.”

21
22 Chrysler Group otherwise objects to this interrogatory as overly broad and
23 because it seeks information that is neither relevant nor reasonably calculated to lead to
24 the discovery of admissible evidence.

25
26 INTERROGATORY NO. 5: For each team, group, or task force that has
27 investigated or analyzed a suspected or actual condition, issue, problem, or defect
28 relating to the TIPM in Class Vehicles, provide:

- 1 a. The name and job title of each person involved, and who they reported to;
2 b. The time period during which the investigation or analysis took place; and
3 c. The nature of the condition, issue, problem, or defect at issue.

4 RESPONSE NO. 5: Engineering and Customer Satisfaction Team investigations
5 of TIPM performance in the field began in April or May, 2012. Regulatory Affairs
6 began an investigation in October 2013. The issue being investigated is the malfunction
7 of the Fuel Pump relay integral to the TIPM Printed Circuit Board involving conditions
8 reported that include crank-no start, hard/long crank, and start-immediate stall. Lead
9 individuals involved in the investigation include those from Engineering and the
10 Customer Satisfaction Team (Satnam Bansal, Jaswinder Sekhon, Binh Tran, David C.
11 Baker, and Seakleang Chheu) and Regulatory Affairs (Kristin Kolodge). Chrysler
12 Group continues to investigate TIPM performance in the field and will decide the course
13 of action it will take, if any, upon completion of the investigation.
14

15 Chrysler Group otherwise objects to this interrogatory as overly broad and because
16 it seeks information that is neither relevant nor reasonably calculated to lead to the
17 discovery of admissible evidence. Chrysler Group further objects to this interrogatory as
18 argumentative to the extent it implies that the TIPMs assembled into the 2011 and 2012
19 Jeep Grand Cherokee (WK), the Dodge Durango (WD), and the Dodge Grand Caravan
20 (RT) are defective, which Chrysler Group denies.

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22 **THOMPSON COBURN LLC**

23
24 By: 

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28 Chrysler Group LLC

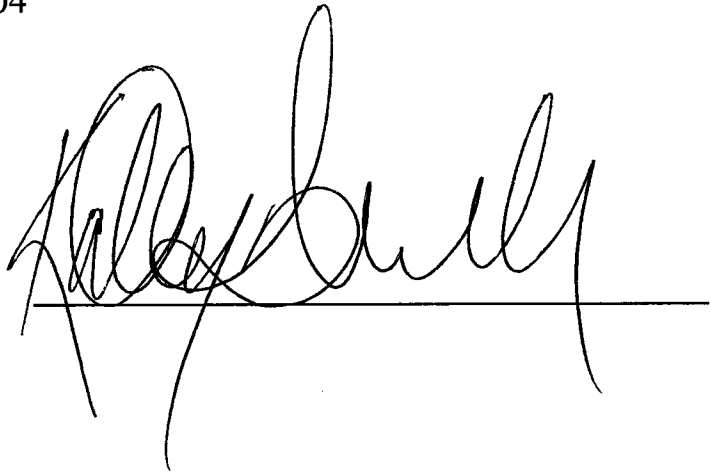
CERTIFICATE OF SERVICE

The undersigned certifies that on this 11th day of April, 2014, a copy of Chrysler Group LLC's Response to Plaintiffs' First Set of Interrogatories was served by electronic and first class mail on:

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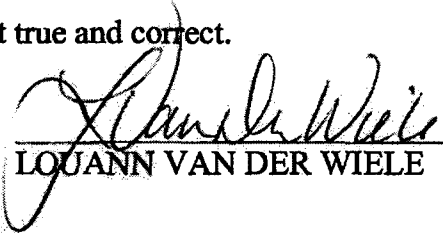
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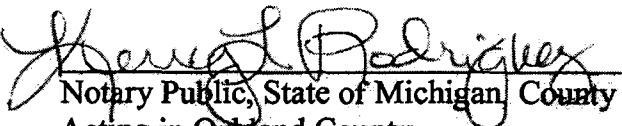
STATE OF MICHIGAN)
)
COUNTY OF OAKLAND)

Louann Van Der Wiele, being first duly sworn, deposes and says that she is Vice President and Associate General Counsel – Litigation & Regulation for Chrysler Group LLC; that she has read the foregoing **CHRYSLER GROUP LLC’S RESPONSE TO PLAINTIFFS’ FIRST SET OF INTERROGATORIES** and subscribed to the same on behalf of Chrysler Group LLC; that the foregoing responses are based on information communicated by Chrysler Group LLC personnel and other persons and information obtained from books and records of Chrysler Group LLC; and that she has no reason to believe that the foregoing responses are not true and correct.



LOUANN VAN DER WIELE

Subscribed and sworn to before me
In Oakland County, Michigan on
this 10th day of April, 2014


Notary Public, State of Michigan, County of Oakland
Acting in Oakland County
My Commission Expires: 10/10/2016

Kerry L. Rodriguez
Notary Public - State of Michigan
County of Oakland
Commission Expires 10/10/2016