

RICHARD D. FOX
RICHARD L. GROFFSKY
DANIEL D. SWANSON
MICHAEL J. CUNNINGHAM
MATTHEW G. CURTIS
CHARLES R. ASH III
ROBERT B. SICKELS
ANDREW KOCHANOWSKI

KENNETH T. WATKINS
SAMUEL A. MEKLIR
JOSEPH H. BOURGON
KEVIN J. STOOPS
JASON J. THOMPSON
LANCE C. YOUNG
MATTHEW L. TURNER
LISA M. ESSER-WEIDENFELLER

RAMONA C. HOWARD JABRAN G. YASSO JESSE L. YOUNG ANDY DRAGOVIC TAD T. ROUMAYAH MICHELLE D. TRENT AMY L. MARINO SARAH L. RICKARD NEIL B. PIOCH
OF COUNSEL
LEONARD B. SCHWARTZ
PAUL GROFFSKY
NORMAN D. TUCKER
JOSEPH E. GRINNAN
DAVID M. BLACK
RICHARD D. TOTH

STEVEN J. SCHWARTZ
WILLIAM M. BRUKOFF
WILLIAM MITCHELL III, PLC
C.K. YOON, PLLC
WILLIAM C. GAGE, P.C.
AVANTI LAW GROUP, PLLC
SENIOR COUNSEL
NORMAN S. SOMMERS

STANLEY S. SCHWARTZ (1930-2004) PATRICK J. BURKETT (1956-2004) JEREMY L. WINER (1942-2001) KENNETH V. COCKREL (1938-1989)

March 27, 2015

RE: Ford Mustang Aluminum Hood Corrosion Project

Dear Fellow Mustang Enthusiast:

Thank you for contacting us about the bubbling and peeling paint on the hood of your Ford Mustang. Our investigation has shown that the problem is a design defect that Ford has known about for years. Since 2006, Ford's technical service bulletins have acknowledged a problem with the Mustang hood.

During the 3 year / 36,000 mile bumper-to-bumper warranty, Ford instructed dealers to sand and repaint any visible corrosion. However, those repairs were ineffective and the problem often reappeared after the warranty expired, sticking owners with either huge repair bills or cars that cannot be sold. Ford also refuses to honor the 5 year / 50,000 mile corrosion warranty sold with these vehicles because this type of surface corrosion does not eat all the way through (i.e., "perforate") the aluminum panel.

We are currently litigating these claims in federal court in New Jersey, but the court still has not determined whether Ford is liable or not. Also, if successful, our case may only resolve the claims of people who purchased their vehicles in New Jersey.

If you live or purchased your vehicle outside New Jersey, the statute of limitations on your claim against Ford is probably expiring or already expired. The vehicles in question were produced from 2005 to 2013 and most states require claims like this to be brought within two to three years. Many owners have successfully sued Ford using their local small claims courts, but you may also be able to find an attorney in your state to advise or represent you.

The reason we are writing is to ask for your assistance with a very important project. We need to convince Ford's management and court in our case that the corrosion problem with the Mustang is serious, costly, and still affecting owners. We designed the enclosed Affidavit and Confidential Questionnaire to collect the information we feel is important, but please feel free to add, edit or cross out anything that does not apply. We would also appreciate any pictures, letters from Ford, or repair estimates you have.



Page 2

For us to be able to use these materials in court, you will have to get your signature notarized. We are enclosing a self-address stamped envelope for you to use to return your completed documentation.

This is an important project and we appreciate your willingness to participate. If you have any questions or concerns about the materials, please call or email my legal assistant, Wendy Vaughn, at 248-415-3176 or wvaughn@sommerspc.com.

Sincerely,

SOMMERS SCHWARTZ, P.C.

LANCE C. YOUNG

LCY/wev

Cc: David Cohen, Esq.

Enclosures:

Form Affidavit & Exhibit Confidential Questionnaire List of Frequently Asked Questions