

If you purchased or leased a 2012-2014 Dodge Charger, 2012-2014 Chrysler 300, or 2014-2015 Jeep Grand Cherokee equipped with a Monostable shifter, a pending class action lawsuit may affect your rights.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

- Casey E. Perkins, David Goldsmith, Michael Vincent Nathan Jr., Debra Felker, Sarah Lalli, Kean McDonald, Pamela Havnen, Dustin Stewart, Charles Frank Schultz, Bernadine Hartt, Scott Michael Youngstrom Jr., Todd Machtley, Melvin Scott, Eliam M. Marrero Bernal, Clare Colrick, John Lynd, Janella Mack, Jacob Gunnells, Danielle and Joby Hackett, Todd Fisher, John and Mary Metzger, Robert F. Hyatt IV, Cameron Phelps, Kelli Foreman, Krystal Dial, Trevor Marble, Karen Stedman, Cameron Webster, and Ann Magnuson (“Plaintiffs”) sued FCA US LLC (referred to as “FCA US” or “Defendant”), alleging that Defendant FCA US LLC designed, manufactured, and sold 2012-2014 Dodge Charger, 2012-2014 Chrysler 300, or 2014-2015 Jeep Grand Cherokee (“Class Vehicles”) with a Monostable shifter that is dangerously defective in design.
- The Court has certified the lawsuit as a class action on behalf of all persons or entities who have purchased or leased a Class Vehicle where the vehicle was purchased or leased in Arizona, California, Colorado, Florida, Illinois, Iowa, Louisiana, Maryland, Massachusetts, Michigan, Nevada, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, Texas, Utah, Washington, or Wyoming, but excluding every person who has brought a claim against FCA US, LLC alleging recovery for bodily injuries caused by those vehicles under any legal theory.
- The Court has certified this class to answer three questions:
 - Whether the monostable gear shift has a design defect that renders the class vehicles unsuitable for the ordinary use of providing safe transportation.
 - Whether the defendant knew about the defect and concealed its knowledge from buyers of the class vehicles.
 - Whether information about the defect that was concealed would be material to a reasonable buyer.
- At this point, Plaintiffs have made allegations and FCA US has denied them. The Court has not yet determined if the allegations of the lawsuits are true or if the Plaintiffs and Class are entitled to any relief. In addition to denying the allegations, FCA US has asserted a number of defenses. The Court or jury will ultimately decide these issues.
- There are no damages or monetary benefits available now and no guarantee there ever will be. However, because the case has been certified as a class action, your legal rights may be affected, and you have a choice to make now.

Questions? Call 1-833-991-1540 or visit www.FCAGearshiftLitigation.com

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

DO NOTHING	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you and FCA US will be bound by the jury or Court's answers to the questions identified above and you keep the possibility of getting money or benefits that may be available in the future. But, you may give up any rights you have to sue FCA US separately concerning the same legal claims in this lawsuit. You will be bound by the outcome of any trial, whether Plaintiffs win or lose.
ASK TO BE EXCLUDED	Get out of this lawsuit. Get no benefits from it. Keep any rights you may have to sue on your own. If you ask to be excluded and money or benefits are later available, you will not share in them. But, if you ask to be excluded, you will keep any rights you may have to sue FCA US separately concerning the same legal claims in this lawsuit. You, on your own or through an attorney you hire, may be able to sue FCA US concerning the same legal claims that are the subject of this lawsuit.

- Your options are explained in this notice. To ask to be excluded, you must act before **June 8, 2020**. Your Legal Rights will be affected whether you act or do not act.
- The Plaintiffs must prove their position on the certified questions at trial. The Court has set the trial date for August 11, 2020 at the Theodore Levin United States Courthouse located at 231 W. Lafayette Blvd., Detroit MI 48226. Please note that the trial date is subject to change.

PLEASE READ THIS NOTICE CAREFULLY.

Any questions? Contact the Notice Administrator at 1-833-991-1540.

BASIC INFORMATION

1. Why did I receive a notice?

Department of Motor Vehicle registration records show that you purchased or leased a Class Vehicle. This notice explains that the Court has ordered, or "certified," a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the deadlines set forth in this notice. Judge David M. Lawson, of the United States District Court for the Eastern District of Michigan is overseeing this class action. The action is titled *In re: FCA US LLC Monostable Electronic Gearshift Litigation*, Case No. 2:16-md-02744-DML-DRG.

2. What is this lawsuit about?

Plaintiffs in this case are Casey E. Perkins, David Goldsmith, Michael Vincent Nathan Jr., Debra Felker, Sarah Lalli, Kean McDonald, Pamela Havnen, Dustin Stewart, Charles Frank Schultz, Bernadine Hartt, Scott Michael Youngstrom Jr., Todd Machtley, Melvin Scott, Eliam M. Marrero Bernal, Clare Colrick, John Lynd, Janella Mack, Jacob Gunnells, Danielle and Joby Hackett, Todd Fisher, John and Mary Metzger, Robert F. Hyatt IV, Cameron Phelps, Kelli Foreman, Krystal Dial, Trevor Marble, Karen Stedman, Cameron Webster, and Ann Magnuson. They allege, on behalf of

Questions? Call 1-833-991-1540 or visit www.FCAGearshiftLitigation.com

themselves and other similarly situated persons that 2012-2014 Dodge Charger, 2012-2014 Chrysler 300, or 2014-2015 Jeep Grand Cherokee were defectively designed because they were equipped with a Monostable shifter that was confusing and unintuitive for drivers. The Monostable shifter provides insufficient tactile and visual cues to the driver causing drivers to believe they had achieved their intended gear position when, in fact, they had not. As a result, the Class Vehicles are prone to unintended rollaway causing damage to property, injury, and in some cases, death.

Plaintiffs assert that the danger posed by unintended rollaway render the Class Vehicles unreasonably dangerous and unfit for their ordinary use. Plaintiffs further assert that FCA US had knowledge of this defect before the Class Vehicles were put to market and concealed key information to the public. Finally, Plaintiffs assert that a recall repair implemented by FCA US to install an “autopark” feature is insufficient because drivers are still uncertain as to whether or not they have achieved their intended gear position.

Plaintiffs assert that FCA US violated several states’ consumer protection and breach of implied warranty laws. Plaintiffs also bring claims for fraudulent concealment, and unjust enrichment.

The company Plaintiffs sued (in this case FCA US LLC) is called the “Defendant.” Defendant denies they have acted unlawfully or improperly, denies that the class certification is appropriate, and further denies Plaintiffs and the class are entitled to any relief. Defendant asserts that once users become familiar with the shifter the chance of a mistake being made is no greater for Class Vehicles than vehicles with other types of shifters. FCA US further contends that, once a vehicle receives a recall remedy, if a mistake is made while shifting to Park, the vehicle will automatically shift into Park if the driver attempts to exit the vehicle. A copy of the Defendant’s answer is available on this website.

3. What is a class action and what is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case Casey E. Perkins, David Goldsmith, Michael Vincent Nathan Jr., Debra Felker, Sarah Lalli, Kean McDonald, Pamela Havnen, Dustin Stewart, Charles Frank Schultz, Bernadine Hartt, Scott Michael Youngstrom Jr., Todd Machtley, Melvin Scott, Eliam M. Marrero Bernal, Clare Colrick, John Lynd, Janella Mack, Jacob Gunnells, Danielle and Joby Hackett, Todd Fisher, John and Mary Metzger, Robert F. Hyatt IV, Cameron Phelps, Kelli Foreman, Krystal Dial, Trevor Marble, Karen Stedman, Cameron Webster, and Ann Magnuson) sue on behalf of themselves and on behalf of other people who have similar claims (“the Class”).

A jury will hear the evidence and arguments presented by both sides and will answer the certified questions. The Class Representatives are obligated to represent the Class and will seek to prove their positions regarding the certified questions on behalf of themselves and the Class. FCA US will seek to rebut Plaintiffs’ positions and advance its own positions on the certified questions. Once the jury or Judge answers the certified questions, everyone in the Class will be bound by those findings. The Court will then make a determination on whether additional proceedings are necessary and what they should entail.

4. Why is this lawsuit a class action?

The Court has decided that this lawsuit can be a class action and move toward a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, this lawsuit has been conditionally certified under Federal Rule of Civil Procedure 23(b)(3) and (c)(4) for determination of the following questions:

Questions? Call 1-833-991-1540 or visit www.FCAGearshiftLitigation.com

- Whether the monostable gear shift has a design defect that renders the class vehicles unsuitable for the ordinary use of providing safe transportation.
- Whether the defendant knew about the defect and concealed its knowledge from buyers of the class vehicles.
- Whether information about the defect that was concealed would be material to a reasonable buyer.

The Court and a jury will hear the evidence and arguments presented by both sides and will decide who should prevail on each of these three issues. Subsequent to that determination, the Court will determine what additional proceedings, if any, are appropriate.

More information about why the Court certified this lawsuit as a class action is in the Court's December 9, 2019 Opinion and Order, which is available on this website.

THE CLAIMS IN THE LAWSUIT

5. How does Defendant answer?

Defendant asserts that once users become familiar with the shifter, the chance of a mistake being made is no greater for Class Vehicles than vehicles with other types of shifters. Defendant further contends that, once a vehicle receives a recall remedy, if a mistake is made while shifting to Park, the shifter will in most cases automatically shift to Park and eliminate the risk of a rollaway.

6. Has the Court decided who is right?

The Court has not decided whose position on the certified questions is correct. That will be done through future proceedings in the case. By establishing the Class and authorizing this notice, the Court is not suggesting that Plaintiffs will win or lose this case. Plaintiffs must prove their position on the certified questions at the upcoming trial described above. FCA US will have an opportunity to rebut Plaintiffs' position and advance its own position on the certified questions.

7. What are the Plaintiffs asking for?

Plaintiffs ultimately seek an award for damages, including payment by FCA US to the Class for the difference vehicle owners would have paid had the defect been disclosed, costs of repair, legal fees and costs, and other relief sufficient to compensate for FCA US's unlawful acts. These requests have not been certified for class-wide treatment, however, and will not be addressed at the upcoming trial described above.

8. Is there any money available now?

No benefits are available now. There has not yet been a decision on the three questions that have been certified for class treatment. There is no guarantee that benefits will ever be obtained. Once the certified questions are answered, and if you have not excluded yourself from the Class, you will be notified if benefits might be available and what you must do to claim them.

WHO IS IN THE CLASS

9. Am I part of this Class?

The Court conditionally certified a “Class” consisting of all persons or entities who meet the following requirements:

All persons or entities who have purchased or leased a class vehicle, which means a 2012-2014 Dodge Charger, 2012-2014 Chrysler 300, or 2014-2015 Jeep Grand Cherokee equipped with the monostable shifter, where the vehicle was purchased in Arizona, California, Colorado, Florida, Illinois, Iowa, Louisiana, Maryland, Massachusetts, Michigan, Nevada, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, Texas, Utah, Washington, or Wyoming, but excluding every person who has brought a claim against FCA US, LLC alleging recovery for bodily injuries caused by those vehicles under any legal theory.

You are receiving this Notice because Department of Motor Vehicle registration records indicate that you have purchased or leased a 2012-2014 Dodge Charger, 2012-2014 Chrysler 300, or 2014-2015 Jeep Grand Cherokee equipped with a Monostable shifter, where the vehicle was purchased in Arizona, California, Colorado, Florida, Illinois, Iowa, Louisiana, Maryland, Massachusetts, Michigan, Nevada, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, Texas, Utah, Washington, or Wyoming.

10. I’m still not sure if I’m included in the Class.

If you are still not sure if you are included in the Class, you can call the Notice Administrator, toll free at 1-833-991-1540 who may be able to answer some of your questions. The Notice Administrator cannot provide legal advice. Or you may call or write to the lawyers representing the Class in this case at the addresses or phone number listed in Sections 13 or 16 below.

YOUR RIGHTS AND OPTIONS

You must now decide whether to stay in the Class or ask to be excluded from the Class and the case.

11. What happens if I do nothing at all?

If you do nothing, you will remain a member of the Class. You do not need to do anything at this time. If you remain a Class Member, you and FCA US will be bound by the jury or Court’s answers to the questions identified above and you keep the possibility of getting money or benefits that may be available in the future. But, you may give up any rights you have to sue FCA US separately concerning the same legal claims in this lawsuit. You will be bound by the outcome of any trial, whether Plaintiffs win or lose.


12. How do I ask the Court to exclude me from the Class?

If you ask to be excluded from the Class, you will not be entitled to any recovery of money or benefits, if any is ultimately available in connection with this case. But you will retain any rights you may have now to sue FCA US about the same legal claims that are the subject of this lawsuit on your own.

Questions? Call 1-833-991-1540 or visit www.FCAGearshiftLitigation.com

To exclude yourself from the lawsuit, you must send a letter stating that you want to exclude yourself from the lawsuit to the below address. Your exclusion request must include:

- Your Name,
- Your Class Vehicle VIN or the Unique ID on the Notice Postcard you received

FCA Monostable Electronic Gearshift Litigation Notice Administrator PO Box 6727 Portland, OR 97228-6727	PRESORTED FIRST-CLASS MAIL US POSTAGE PAID CITY, ST PERMIT #000
Unique ID: ABCDE12345	
UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN NOTICE OF CLASS ACTION If you purchased or leased a 2012-2014 Dodge Charger, 2012-2014 Chrysler 300, or 2014-2015 Jeep Grand Cherokee equipped with a Monostable shifter leased in Arizona, California, Colorado, Florida, Illinois, Iowa, Louisiana, Maryland, Massachusetts, Michigan, Nevada, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, Texas, Utah, Washington, or Wyoming, a pending class action lawsuit may affect your rights. This is not a lawyer solicitation.	 John Q. Public 123 Locust St. Anytown, OH 00000-0000
•••••	

- A statement: "I request to be excluded from the Class in this lawsuit."
- Your signature

You must mail the request letter to the below address and it must be postmarked no later than **June 8, 2020**.

FCA Monostable Electronic Gearshift Litigation
PO Box 6727
Portland, OR 97228-6727

If you have questions, you can call the Notice Administrator, toll free at 1-833-991-1540. However, exclusions via telephone or email will not be effective. Exclusions executed by someone besides you on your behalf will not be effective. You must sign the exclusion request.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Yes. The Court has appointed E. Powell Miller of the Miller Law Firm P.C., Steve Berman of Hagens Berman Sobol Shapiro LLP, Joseph Meltzer of Kessler Topaz Meltzer & Check, LLP, Daniel E. Gustafson of Gustafson Gluek PLLC, Robert K. Shelquist of Lockridge Grindal Nauen P.L.L.P., and Gregory F. Coleman of Greg Coleman Law PC as "Class Counsel."

E. Powell Miller, Sharon S. Almonrode,
Emily E. Hughes, Dennis A. Lienhardt,
William Kalas
Miller Law Firm P.C.
950 W. University Drive, Suite 300
Rochester, MI 48307
FCAMonostable@millerlawpc.com

Steve W. Berman
Christopher R. Pitoun
Hagens Berman Sobol Shapiro LLP
301 North Lake Avenue, Suite 920
Pasadena, CA 91101
FCAMonostable@hbsslaw.com

Questions? Call 1-833-991-1540 or visit www.FCGearshiftLitigation.com

Joseph H. Meltzer Tyler S. Graden Kessler Topaz Meltzer & Check, LLP 280 King of Prussia Road Radnor, PA 19087	Daniel E. Gustafson, Jason S. Kilene, David A. Goodwin, Raina C. Borrelli Gustafson Gluek PLLC Canadian Pacific Plaza 120 S. Sixth St. Suite 2600 Minneapolis, MN 55402
Robert K. Shelquist Rebecca A. Peterson Lockridge Grindal Nauen P.L.L.P. 100 Washington Ave., Suite 2200 Minnesota, MN 55402	Gregory F. Coleman, Lisa A. White, Mark E. Silvey, Adam E. Edwards Greg Coleman Law PC First Tennessee Plaza 800 S. Gay Street, Suite 1100 Knoxville, TN 37929

14. Should I get my own lawyer?

If you wish to remain a Class Member you do not need to hire your own lawyer because Class Counsel is working on your behalf. You may make an appearance in the case through another attorney if you choose. If you wish to pursue your own case separate from this one, you will need to file a request for exclusion. If you do so, you will need to decide whether to hire your own attorney at your own cost.

15. How will the lawyers be paid?

If Plaintiffs and Class Counsel obtain benefits for the Class, they will ask the Court for fees and expenses. You will not have to pay these fees and expenses.

16. How do I get more information?

This Notice contains a summary of relevant Court papers. You can review relevant Documents and Orders online at www.FCAGearshiftLitigation.com. You will also find important documents related to the lawsuit including the Court's Order on Class Certification, the Second Amended Class Complaint, and Defendants' Answer, as well as answers to frequently asked questions. Please check the website regularly for updated information regarding the lawsuit. You may also access the Court's publically available legal files at the U.S. District Court for the Eastern District of Michigan in Detroit, Michigan.

You can call the Notice Administrator, toll free at 1-833-991-1540. You may also contact Class Counsel by calling 1-800-635-9212:

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

Dated: April 22, 2020

BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

Questions? Call 1-833-991-1540 or visit www.FCAGearshiftLitigation.com