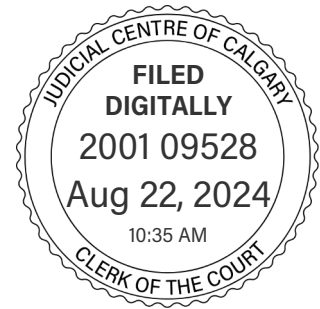


COURT FILE NO. 2001-09528  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE CALGARY  
PLAINTIFF CHRISTOPHER HEARD  
(APPLICANT)  
DEFENDANTS FIAT CHRYSLER AUTOMOBILES N.V., FIAT  
(RESPONDENTS) CHRYSLER AUTOMOBILES US LLC, FCA  
CANADA INC., MOPAR & DESIGN, and WOCO  
TECH USA, INC.



*Brought under the Class Proceedings Act*

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**AFFIDAVIT OF ANNA LANGLOIS**

(Sworn August 16, 2024)

I, Anna Langlois, of the City of Windsor, in the Province of Ontario, MAKE OATH AND SAY THAT:

1. I am Product Analysis Engineer at FCA Canada Inc. (“**FCA Canada**”). I have served in this position since 2015, and have been employed by FCA Canada since 2013. As such, I have knowledge of the matters contained in this affidavit, except for those matters that are stated as being based upon information provided to me by others, all of which I believe to be true.

**FCA Canada**

2. FCA Canada is a corporation with its head office in the City of Windsor, Ontario. FCA Canada conducts business of assembling selected models of motor vehicles, importing into Canada other models of vehicles, and distributing various models of vehicles within Canada. FCA Canada imported and distributed in Canada most, and possibly all, of the vehicles which are the subject-matter of this legal proceeding, but FCA Canada did not assemble any of those vehicles.

3. The defendant, Fiat Chrysler Automobiles US LLC, whose correct name is FCA US LLC (“**FCA US**”), is a United States corporation with head office in the City of Auburn Hills, Michigan. FCA US conducts business of designing and assembling various models of vehicles. FCA US designed and assembled the vehicles which are the subject-matter of this legal proceeding. FCA US does not distribute or sell or lease vehicles in Canada.

4. I am informed by Christopher Pardi, General Counsel for FCA US LLC, that the defendant, Fiat Chrysler Automobiles N.V., whose correct name is Stellantis N.V. (“**Stellantis N.V.**”), is a corporation incorporated in the Netherlands. Stellantis N.V. is a holding company; it does not conduct, nor has it ever conducted, business related to the design, assembly, manufacturing or distribution of vehicles in Canada.

5. FCA Canada does not sell or lease vehicles directly to consumers (the only instances when FCA Canada has sold vehicles directly to a purchaser are “fleet” sales to a limited number of governments and rental car companies). Rather, as a distributor in Canada, FCA Canada sells vehicles to authorized dealers in Canada, who in turn sell or lease the vehicles to consumers. The authorized dealers are independent of FCA Canada, FCA US, and Stellantis N.V.

### **Air Suspension System**

6. I have reviewed the amended statement of claim which has been issued in this legal proceeding. I understand that the plaintiff is seeking to represent a proposed class of all persons who purchased a 2013-2020 model year RAM 1500 truck equipped with the optional Active-Level Four-Corner air suspension system or a 2013-2020 model year Jeep Grand Cherokee vehicle equipped with the optional Quadra-Lift air suspension system within Canada (together, the “**Class Vehicles**”). I have also reviewed the notice of application for certification. The proposed class to which it refers is different; it refers to a class range of 2013-2023 model year RAM 1500 truck and a class range of 2011-2023 model year Jeep Grand Cherokee vehicle.

7. The above-noted 2013-2023 model year RAM 1500 trucks had the option of being equipped with the Active-Level Four-Corner air suspension system, and the above-noted 2011-2023 model year Jeep Grand Cherokee SUVs had the option of being equipped with the Quadra-Lift air suspension system. Both of those air suspension systems utilize pneumatic air springs and an onboard compressor assembly to dynamically adjust the vehicle’s ride height and stiffness by individually adjusting the air pressure in each of the four air springs located at each corner of the vehicle.

8. FCA Canada is aware that operators of some Class Vehicles had potential to experience no change in vehicle ride height when the air suspension system was activated in very

cold conditions (below -12 degrees Celsius or 10 degrees Fahrenheit). This related to some reversing valves within the air compressor assembly sticking due to higher friction caused by cold weather, blocking the nitrogen from being transferred to and from the air springs and resulting in the ride height not changing. To prevent the reversing valves from sticking in cold weather, FCA Canada: (1) updated the software in the air suspension control module to improve the push of nitrogen through the reversing valves, and (2) updated the compressor with a coating on the internal O-rings to reduce friction. Among other corrective actions, beginning in 2017 FCA Canada instructed authorized dealers to update the software in the air suspension control module and to test and, if necessary, replace, the compressor assembly on Class Vehicles that experienced a ride height issue with the a compressor assembly containing the above-noted updated O-rings.

9. If the ride height does not change when the air suspension system in a Class Vehicle is prompted either manually by the operator or automatically by the air suspension control module, the operator is immediately alerted to same by both visual and auditory notifications – specifically, a warning light illuminates on the dashboard and an audible chime may also sound.

#### **Transport Canada and NHTSA**

10. Transport Canada, the regulator of vehicle safety in Canada, monitored and assessed the operational issue relating to the air suspension between 2017 to 2019. Transport Canada never suggested to FCA Canada that it considered this matter to present any risk to safety or that it believed FCA Canada should conduct a recall of the Class Vehicles.

11. I understand from Stuart Shaw, the former (now retired) Manager of Vehicle Safety of FCA Canada, that ultimately, on or about June 25, 2019, Transport Canada confirmed to FCA Canada that it did not identify any safety risk issue related to the air suspension system in the Class Vehicles, and thus Transport Canada closed its assessment of this matter.

12. Similarly, I have been informed by Chris Freeman, Director – Government Investigations & Advocacy and Technical Safety & Regulatory Compliance of FCA US, that National Highway Traffic Safety Administration (“NHTSA”), the regulator of vehicle safety in the United States, has never suggested to FCA US any safety risk concerns in relation to the air suspension system in the corresponding models of vehicles in the US, nor has it ever suggested or insisted that a recall be conducted in relation to this matter.

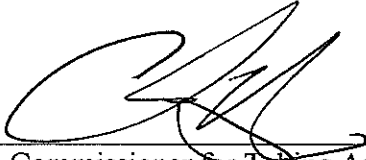
### **Number of Class Vehicles**

13. I have conducted a search of FCA records with a view to trying to determine the number of 2013-2023 model-year RAM 1500 trucks equipped with the optional Active-Level Four-Corner air suspension systems, and of 2011-2023 model-year Jeep Grand Cherokee vehicles equipped with the optional Quadra-Lift air suspension system, which were initially sold or leased by authorized dealers to consumers in Canada. The results of my search, as of February 29, 2024, are as follows:

- (a) 2013-2023 RAM 1500 vehicles: 71,029
- (b) 2011-2023 Jeep Grand Cherokee vehicles: 52,051

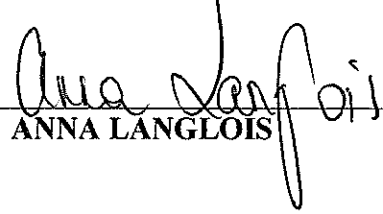
14. If those numbers are not precisely accurate, I believe that they are very close approximations of the actual numbers as of February 29, 2024. These numbers can be expected to fluctuate over time as vehicles are scrapped, imported into Canada or exported out of Canada.

**SWORN** before me at the City of Windsor, in the Province of Ontario, on August 16, 2024.



Commissioner for Taking Affidavits in the Province of Ontario

**CHRISTOPHER DUNN**  
**LSO: 54251C**



**ANNA LANGLOIS**