
From: Kappers, Robert
Sent: Friday, April 4, 2025 6:23 AM
To: SJ AAM Team
Subject: Fwd: [EXTERNAL] FCA US LLC Subpoena, Case No. 2:23-cv-12470-LVP-EAS
Attachments: 4-2-2025 Laidlaw Declaration.pdf; Neapco Components LLC.pdf

Begin forwarded message:

From: "Falkler, Jonathan L." <JLFalkler@venable.com>
Date: April 3, 2025 at 3:55:40 PM CDT
To: "Kappers, Robert" <rkappers@steptoe.com>
Subject: [EXTERNAL] FCA US LLC Subpoena, Case No. 2:23-cv-12470-LVP-EAS

Counsel,

I write on behalf of FCA US LLC in response to the attached subpoena. FCA objects to the requests, including the request for deposition testimony, as overburdensome and seeking information not relevant and proportional to the needs of the case, particularly in view of FCA's status as a non-party to the underlying litigation and the availability of the requested information through less burdensome means. In satisfaction of the subpoena, FCA provides the attached declaration providing information available to FCA related to the public accessibility of the 2016 Jeep Renegade service information manual.

Regards,
Jon

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