

EXHIBIT A

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June 28, 2013

VIA UPS OVERNIGHT DELIVERY

Ford Motor Company
Attn: General Counsel's Office
1 American Rd #904
Dearborn, Michigan 48126

To Whom It May Concern:

OFFICE OF THE SECRETARY
BRADLEY M. GAYTON
13 JUL -2 P2:28
UPS

OF COUNSEL
Anthony Allen Geyelin
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**Attorneys admitted to
Jurisdiction other than PA*

We represent William Creed ("Mr. Creed"), an individual who purchased a 2011 model year Ford Explorer equipped with the SYNC® and MyFord Touch® infotainment system, a vehicle we understand is manufactured, marketed and/or sold by Ford Motor Company ("Ford" or "Company"). Upon information and belief, Ford included the SYNC® and MyFord Touch® (rebranded as MyLincoln Touch® in Lincoln vehicles) (the "Sync System") infotainment systems in certain Ford and Lincoln vehicles ("Vehicles"). It has come to the attention of consumers, including Mr. Creed, who have purchased and/or leased the Vehicles that Ford has engaged in deceptive, fraudulent and misleading consumer practices in connection with the marketing and sale of the Vehicles resulting in both economic and non-economic damages to consumers.

This letter is submitted pursuant to Massachusetts General Laws, Chapter 93A, Section 9 on behalf of Mr. Creed and on behalf of all similarly situated individuals in the United States who are current or former owners and/or lessees of the Vehicles, who have suffered or will suffer out of pocket loss and/or other ascertainable loss of moneys and/or property and/or value as a result of the misrepresentations and/or omissions of Ford related to the Sync System.

In particular, Ford has, in violation of Massachusetts General Laws, Chapter 93A, section 9, failed, despite its longstanding knowledge of the

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problem, to disclose to Mr. Creed and other consumers that the Sync Systems contained in the Vehicles were prone to defective operation, including but not limited to, the following:

- blank/black display by the screen,
- the radio switches from off to on or changes state after ending a phone call or voice command,
- problems with phone pairing,
- incorrect Sirius channel selection using voice command,
- inability to download photo resolution 800x378,
- problems with phonebook downloads,
- the AM/FM display missing preset information,
- problems with voice recognition, especially when using SYNC services,
- problems with USB device detection, and travel link download time,
- Sirius channel art logo mismatch,
- the clock intermittently displays incorrect time,
- problems with traffic direction and information (TDI) calling wrong phone number, travel link subscription, and address book downloads,
- the navigation is set in kilometers but voice communicates in miles,
- problems with backup camera scrolling display, and
- inoperable navigation and/or freezes (collectively, the "Sync System Defect").

Ford has benefited from collecting funds from its customers who have paid for the Sync System option, as well as, potentially unnecessary vehicle service procedures such as diagnostic charges, computer re-programming and/or software updates when in fact Ford knew the true cause of the Sync System Defect within these Vehicles.

Ford has been aware for years of the true nature and cause of the Sync System Defect in the Vehicles. In spite of this knowledge, Ford has intentionally withheld from, and/or misrepresented to Mr. Creed and other similarly situated consumers of the Vehicles such material information.

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These unfair or deceptive acts or practices are declared unlawful by, inter alia, Section 2 of Chapter 93A, which reads as follows:

Unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful.

On behalf of Mr. Creed and all similarly situated people, we demand at least the following relief, at no cost to Mr. Creed and/or to those similarly situated:

1. the voluntary recall, inspection and, as necessary, repair and/or replacement of the Vehicles, Sync System and/or component parts in the subject vehicles;
2. the provision of adequate notice to Mr. Creed and those similarly situated of the Sync System Defect;
3. award Mr. Creed and those similarly situated actual damages representing, with interest, the ascertainable loss of moneys and/or property and/or value suffered or to be suffered as a result of Ford's omissions and/or misrepresentations related to the Sync System Defect;
4. award Mr. Creed and those similarly situated treble damages;
5. award Mr. Creed and those similarly situated damages suffered or to be suffered as a result of Ford's breach of contract, and restitution for the unjust enrichment conferred upon Ford;
6. award Mr. Creed and those similarly situated reasonable attorneys' fees; and
7. award Mr. Creed and those similarly situated additional appropriate relief as deemed necessary or proper.

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Chapter 93A gives you the opportunity to make a good-faith response to this letter within thirty (30) days. Your failure to do so could subject you to triple damages and attorney's fees.

Sincerely,



Matthew D. Schelkopf

MDS/klw