

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Lydia Leonberg, *on behalf of herself and all others similarly situated,*

Plaintiff,

V.

VOLVO CARS OF NORTH AMERICA, LLC, a Delaware limited liability corporation, and VOLVO CAR USA, LLC, a Delaware limited liability corporation,

Defendants.

[illegible]

Civil Action No.:

## CLASS ACTION COMPLAINT

## JURY TRIAL DEMANDED

Plaintiff Lydia Leonberg, by undersigned counsel, brings the following Class Action Complaint against Defendants Volvo Cars of North America, LLC, and Volvo Car USA, LLC (collectively, “Volvo” or “Defendants”), and alleges, on her own behalf and on behalf of all those similarly situated, as follows:

## INTRODUCTION

1. Plaintiff brings this lawsuit on behalf of herself and a proposed class of past and present owners and lessees of defective 2021 to 2025 Volvo XC40, 2022 to 2025 Volvo C40, 2022 to 2025 Volvo XC60, 2022 to 2025 Volvo XC90, 2022 to 2025 Volvo S60, 2022 to 2025 Volvo S90, 2022 to 2025 Volvo V60, 2022 to 2025 Volvo V90, 2025 Volvo EX30, 2025 Volvo EX40, and 2025 Volvo EX90 vehicles (collectively the “Class Vehicles”) marketed, distributed, sold, warranted, and serviced by Volvo.

2. Plaintiff purchased a new 2023 Volvo XC60 for \$54,715.00. Within the first *month*, the central infotainment system started to freeze, the rear-view camera would not come on, headlights would flash and the blinkers malfunctioned. After multiple repairs, software updates and recall, the infotainment system continued to malfunction. All these malfunctions are

due to pervasive software bugs and failures in the design, development, testing, and validation of Volvo's Android Automotive Operating System. Plaintiff is not alone, owners of these vehicles are vocal about the defect with these vehicles that Volvo cannot or will not repair. Plaintiff seeks relief for herself and those similarly situated.

3. Volvo's infotainment system – based on the Android Automotive Operating System (“AAOS”) – is designed to attract buyers who want to manage available technology while on the road, and at the same time minimizing distractions and maximizing safety. Volvo promises that its AAOS-based infotainment system does all of this and more.

4. Among other operations, Volvo's AAOS-based infotainment system allows the vehicle owner to operate the audio systems in the vehicle, use the GPS navigation technology, control the climate systems, including defrosters, operate the rear-view camera, operate the adaptive cruise control, and operate a Bluetooth-enabled mobile telephone or other device, with the touch of a fingertip or voice control.

5. Volvo first deployed the AAOS-based infotainment system in the XC40 Recharge model, the electric version of the XC40, beginning with the 2021 model year. Beginning with the 2022 model year, Volvo introduced the AAOS-based infotainment system – as a standard equipment – in the remainder of their model line-up: XC40, XC60, XC90, S60, S90, V60, V90, and in other models.

6. Volvo states their AAOS-based infotainment system “is defined by a user-friendly interface and unparalleled connectivity,” and aims “[t]o give customers the same experience that they are used to on their phones, but adapted for hands-free interaction while driving.”<sup>1</sup> Volvo

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<sup>1</sup> <https://www.volvocars.com/intl/media/press-releases/3D3969ED7CDC8B4E/> (last visited Dec. 12, 2025).

further promise that “drivers can use their voice to get things done while keeping their focus on the road.”<sup>2</sup>

7. However, actual driver experiences with the AAOS-based infotainment system differ dramatically from Volvo’s representations. Owners and lessees of the Class Vehicles have reported widespread, recurring, and persistent failures of the AAOS-based infotainment system, as reflected in hundreds of complaints submitted to the National Highway Traffic Safety Administration (“NHTSA”) and repeated reports to Volvo and their dealerships. These complaints describe common and recurring failure modes, including the infotainment system freezing, rebooting, crashing, or failing to initialize during normal vehicle operation. When these failures occur, drivers lose access to multiple vehicle functions controlled through the AAOS-based infotainment system, including navigation, audio, climate controls, turn-signal sounds, driver-assistance alerts, and – most critically – safety systems such as the federally required rear-view camera and defrosting and defogging functions. In many instances, the center display goes completely dark or blank, displays messages such as “Camera Temporarily Unavailable” or “Infotainment system starting,” or enters an involuntary reboot cycle. Other commonly reported failures include frequent screen blackouts, non-responsive touch and voice commands, loss of Bluetooth, cellular, or GPS connectivity, rear-view camera images freezing, flickering, or disappearing while reversing. These failures often recur even after dealer visits and software updates and, in many cases, persist following recall-related repairs, demonstrating that the defect is systemic rather than isolated.

8. The AAOS-based infotainment system defects render the Class Vehicles non-compliant with federal safety standards. Federal Motor Vehicle Safety Standard (“FMVSS”) No.

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<sup>2</sup> *Id.*

111 requires a functional rear-view camera image when a vehicle is placed in reverse, and FMVSS 101 requires that critical vehicle displays and controls remain visible and operable during normal driving. As reported by owners, malfunctions of the AAOS-based infotainment system cause the rear-view camera image to fail or disappear and disable required displays and controls. Because these federally mandated functions depend on the AAOS-based infotainment system, its failure results in loss of rear visibility and display functionality during ordinary operation, creating a safety hazard and regulatory non-compliance.

9. The AAOS-based infotainment system failures directly jeopardize the safety of the vehicle driver and occupants, and other motorists and pedestrians, by disabling safety features and preventing the driver from using features necessary to drive the vehicle in a safe and reasonable manner.

10. Importantly, in the event of the AAOS-based infotainment system malfunction, Class Vehicle owners/lessees are forced to focus on the malfunction while driving or are distracted by the malfunction putting the driver at risk of an accident.

11. The AAOS-based infotainment system problems have been extensive and pervasive early on, and Volvo admitted publicly that in April 2021 they had begun receiving internal reports that the rear-view camera image would fail to appear in AAOS-based infotainment system vehicles.<sup>3</sup>

12. Volvo knew – prior to selling the Class Vehicles to Plaintiff and class members – that the Class Vehicles contained a safety defect that caused the AAOS-based infotainment system to fail suddenly and without warning.

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<sup>3</sup> <https://static.nhtsa.gov/odi/rcl/2025/RCLRPT-25V282-3568.PDF> (last visited December 12, 2025).

13. The AAOS-based infotainment system failures are due to pervasive software bugs and failures in the design, development, testing, and validation of the Android Automotive Operating System. The system's flawed software architecture and deficient update processes cause instability, improper initialization, and breakdowns in error handling, resulting in the center display, rear-view camera, climate controls, navigation, and other vehicle functions freezing, crashing, or failing to load during normal operation (the "Infotainment Defect" or "Defect").

14. To date, Volvo has failed to remedy this safety Defect under its warranty, forcing Class Vehicle owners to continue operating vehicles with the defect. Volvo has not provided dealers with an effective repair, and the only safety recall issued to date – limited to the back-up camera – has not corrected the underlying problem. Numerous owners, including the Plaintiff, continue to report persistent rear-view camera failures even after recall-related repairs. At most, Volvo have issued software updates that do not resolve the Defect.

15. Further, the Infotainment Defect often manifests immediately after Class Members take ownership of the vehicles and Class Vehicles owners, including the Plaintiff, have complained that they experienced the Infotainment Defect within weeks of acquiring their vehicles:

- NHTSA Complaint No. 11447254 (2022 Volvo XC60), January 12, 2022: Volvo rushed the 2022 model year XC60 with the new Google infotainment to market before all the bugs were worked out. **While driving after 4 weeks of ownership**, the HVAC was not working so unable to defog the windshield, the turn signal lights were not working, maps and speed limit alerts not working. Had to manually reboot the infotainment to regain these necessary safety features. There are numerous internet forums describing issues with the new Google based infotainment that Volvo is using and the slow response to address them. Even the dealer is aware of these reported issues.

16. Despite having pre-sale knowledge of the Defect, Volvo failed to disclose it to Plaintiff and other class members at the time of purchase or lease. Had they done so, Plaintiff and Class Members would not have purchased the Class Vehicles or would have paid substantially less for them.

17. Volvo's conduct is in violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. § 201-1, *et seq.*, and constitutes fraudulent concealment, unjust enrichment, and a breach of express and implied warranties.

18. Volvo have and will continue to benefit from their unlawful conduct – by selling more vehicles, at a higher price, and avoiding warranty obligations – while consumers are harmed at the point of sale as their vehicles continue to suffer from the unremedied Infotainment Defect.

19. To remedy Volvo's unlawful conduct, Plaintiff, on behalf of herself and putative class members, seeks damages and restitution from Volvo, as well as notification to class members about the defect.

### **PARTIES**

20. Plaintiff Lydia Leonberg (“Ms. Leonberg” or “Plaintiff”) is an adult individual residing in Harmony, Pennsylvania. For purposes of 28 U.S.C. § 1332, Plaintiff is a citizen of Pennsylvania.

21. Defendant Volvo Cars of North America, LLC (“VCNA”) is a Delaware limited liability company with its principal place of business at 1800 Volvo Place, Mahwah, New Jersey 07430. VCNA is a wholly-owned subsidiary of Volvo Car Corporation, which is a Swedish corporation with its principal place of business in Gothenburg, Sweden, and which manufactures Volvo-branded cars. VCNA provides marketing, sales, distribution, parts service and training

support for Volvo brand passenger cars in the United States. VCNA is an authorized importer and distributor of Volvo motor vehicles in the United States. For purposes of 28 U.S.C. § 1332, VCNA is a citizen of Sweden.

22. Defendant Volvo Car USA, LLC (“VCUSA”) is a Delaware limited liability company with its principal place of business at 1800 Volvo Place, Mahwah, New Jersey 07430. VCUSA is an authorized importer and distributor of Volvo motor vehicles in the United States. VCUSA’s sole member is VCNA. For purposes of 28 U.S.C. § 1332, VCUSA is a citizen of Sweden.

23. At all times herein mentioned, Defendants review and analyze warranty data submitted by Defendants’ dealerships and authorized technicians in order to identify defect trends in vehicles. Upon information and belief, Defendants dictate that when a repair is made under warranty (or warranty coverage is requested), service centers must provide Defendants with detailed documentation of the problem and the fix that describes the complaint, cause, and correction, and also save the broken part in the event Defendants decides to audit the dealership. Defendants use this information to determine whether particular repairs are covered by an applicable Volvo warranty or are indicative of a pervasive defect.

24. Defendants also developed the marketing materials to which Plaintiff and the Class were exposed, owner’s manuals, informational brochures, warranty booklets, and information included in maintenance recommendations and/or schedules for the Class Vehicles, all of which fail to disclose the Infotainment Defect.

### **JURISDICTION AND VENUE**

25. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(d) of the Class Action Fairness Act of 2005 because: (i) there are 100 or more class

members, (ii) there is an aggregate amount in controversy exceeding \$5,000,000, exclusive of interest and costs, and (iii) there is minimal diversity because Plaintiff and Class Members, and Defendants are citizens of different states.

26. Personal jurisdiction and venue are proper in this District as Defendants are headquartered in this District.

**FACTUAL ALLEGATIONS APPLICABLE TO INDIVIDUAL PLAINTIFF**

27. On November 18, 2022, Ms. Leonberg purchased a new 2023 Volvo XC60, Vehicle Identification Number YV4L12RW5P1265608 (hereafter the “Leonberg Vehicle”) from Bobby Rahal Volvo in Wexford, Pennsylvania (hereafter “Bobby Rahal Volvo”), Defendants’ authorized dealership.

28. Ms. Leonberg paid \$54,715.00, plus taxes, fees, and other charges, for the Leonberg Vehicle.

29. Passenger safety and reliability were important factors to Ms. Leonberg’s decision to purchase the vehicle. Prior to purchasing the 2023 Volvo XC60, Ms. Leonberg researched the vehicle by visiting Bobby Rahal Volvo and reviewing Volvo XC60 specifications and features listed on Volvo’s website, as well as reviewing the *Monroney* sticker affixed to such vehicles. Ms. Leonberg was particularly influenced by Volvo’s representations that her Android-based mobile phone was compatible with, and could be seamlessly integrated into, the Volvo XC60’s AAOS-based infotainment system.

30. Based on Volvo’s and their authorized dealership’s representations, Ms. Leonberg was led to believe that the 2023 Volvo XC60 was, among other things, a safe, reliable, and high-quality vehicle, and Volvo’s representations induced her to purchase the vehicle.

31. Prior to the purchase, Bobby Rahal Volvo assured Ms. Leonberg that the Leonberg Vehicle was accompanied by Volvo's New Vehicle Limited Warranty.

32. In its New Vehicle Limited Warranty Volvo promised to correct the "defects in material or workmanship" without charge within 48 months or 50,000 miles in service, whichever occurs first.

33. Despite Ms. Leonberg's research prior to purchasing the vehicle, neither Volvo nor the selling dealership ever disclosed at the time of purchase that the 2023 Volvo XC60 contained the Infotainment Defect. Indeed, Volvo concealed this information from consumers, and Ms. Leonberg was not aware of, and did not have any reason to anticipate, that her vehicle was afflicted by the Infotainment Defect when she purchased the vehicle.

34. Volvo's omissions were material to Ms. Leonberg. If Volvo had adequately disclosed these facts before Ms. Leonberg purchased the vehicle, she would have learned of the concealed information and would not have bought the vehicle had she known the vehicle suffered from the Infotainment Defect, or would have paid substantially less for it.

35. Shortly after Ms. Leonberg took delivery of the Leonberg Vehicle on November 18, 2022, she started experiencing the Infotainment Defect. The AAOS-based infotainment system in the Leonberg Vehicle intermittently and without warning froze, became unresponsive, and displayed a blank or black screen. When these failures occurred, the infotainment system frequently failed to activate the rear-view camera when the vehicle was placed in reverse, lost Bluetooth and cellular connectivity to Ms. Leonberg's mobile phone, and lost all audio output, including turn-signal sounds and system alerts. In many instances, the infotainment system would not recover on its own and required a forced reboot by pressing and holding the Home

button. At times, even this reboot procedure failed, requiring the Leonberg Vehicle to be shut down or serviced by a dealer to restore functionality.

36. The Infotainment Defect has rendered the Leonberg Vehicle unsafe to drive because Ms. Leonberg has found that once Defect manifests, she is distracted and loses her focus while driving, as she has to continually take her eyes off the road to see why the infotainment system in her car stopped responding to her inputs, or why the screen turned black.

37. On December 20, 2022, with her vehicle's odometer reading about 1,000 miles, Ms. Leonberg returned her car to Bobby Rahal Volvo and complained the infotainment system was freezing and becoming unresponsive, her phone was losing its connection to the system, the headlights were flashing off and on when driving down the road, and the "turn indicator malfunction" displayed on the infotainment screen. Bobby Rahal Volvo inspected the Leonberg Vehicle attempted repairs.

38. On December 27, 2022, Bobby Rahal Volvo informed Ms. Leonberg that her car was repaired and ready for pick up. Ms. Leonberg came to the dealership that same day and, upon entering her car, saw a warning notice stating "SOS E CALL SERVICE REQUIRED". Ms. Leonberg left her vehicle at Bobby Rahal Volvo for further diagnosis and repair.

39. On December 30, 2022, Bobby Rahal Volvo service manager Jim Anderson called Ms. Leonberg and said her vehicle was repaired and ready for pick up. In the same phone call, Mr. Anderson stated the Leonberg Vehicle battery was undercharged due to a software flaw. Ms. Leonberg felt unsafe picking up her car with unresolved battery draining problem and asked Bobby Rahal Volvo to repair it.

40. On January 7, 2023, Ms. Leonberg picked up her vehicle. However, the Infotainment Defect persisted, where intermittently and without warning, the infotainment screen

turned black and became completely nonfunctional, the display panel for navigation, radio, climate controls, including defrost function, stopped working, the rear-view camera failed to display, the system lost phone connection, the radio/audio playback did not operate and failed to reproduce sound and the voice command did not work, causing Ms. Leonberg to be unable to make calls or obtain navigation assistance through the microphone. In addition, while driving on the highway, the infotainment system froze and the side mirrors unexpectedly folded inward, causing Ms. Leonberg to fear for her safety and continue driving until she reached her workplace.

41. On March 20, 2023, with her vehicle's odometer reading about 3,124 miles, Ms. Leonberg returned her vehicle to Bobby Rahal Volvo and complained again the infotainment system in her car was still malfunctioning where the infotainment screen was unresponsive causing loss of navigation, phone connectivity, and rear-view camera failing to active, and the mirrors having folded while driving on the highway. During that visit, Bobby Rahal Volvo attempted a repair by performing a software update and returned the Leonberg Vehicle to Plaintiff the same day.

42. However, following this visit, the infotainment system continued to freeze and rear-view camera would not activate. On June 19, 2023, with the odometer reading of about 4,618 miles, Ms. Leonberg returned her car to Bobby Rahal Volvo for a repair. During that visit, Bobby Rahal Volvo attempted a repair by performing another software update and returned the Leonberg Vehicle to Plaintiff on June 21, 2023.

43. On November 9, 2023, with her vehicle's odometer reading about 8,299 miles, Ms. Leonberg returned the vehicle to Bobby Rahal Volvo and complained again about the infotainment system in her car freezing and rear-view camera failing to come on, navigation not

working or preventing Ms. Leonberg from inputting directions or failing to respond to voice commands, and loss of connection with her phone. During that visit, Bobby Rahal Volvo verified the complaint and attempted a repair by performing the system reset, and returned the Leonberg Vehicle to Plaintiff the same day.

44. However, following this visit, the Leonberg Vehicle continued to suffer from the repeat infotainment system failures, which Volvo attempted to remedy – unsuccessfully – by issuing periodic over-the-air software updates.

45. On May 7, 2024, with her vehicle's odometer reading about 14,293 miles, Ms. Leonberg returned the vehicle to Bobby Rahal Volvo following an email notification to bring her car in for a software upgrade. During that visit, Bobby Rahal Volvo installed a Volvo-issued software upgrade intended to enable enhanced over-the-air updates that allow new features and improvements to be delivered without a dealership visit.

46. On April 6, 2025, Volvo's over-the-air software update failed, causing the Leonberg Vehicle instrument panel and infotainment screen to turn black and unresponsive.

47. Thereafter, on April 11, 2025, with her vehicle's odometer reading about 20,211 miles, Ms. Leonberg took her car to Germain Volvo Jaguar Land Rover, an authorized Volvo dealership and successor to Bobby Rahal Volvo (hereinafter "Germain Volvo"), for a repair to the infotainment system. During that visit Germain Volvo attempted a repair by performing another software update.

48. However, the infotainment system continued to freeze, turn black or blurry, the rear-view camera would not turn on, nor would the navigation. Intermittently, Ms. Leonberg could not input directions and the system failed to respond to voice commands.

49. On June 27, 2025, Volvo mailed Ms. Leonberg a letter informing her of a Safety Recall 25V-282 pertaining to loss of rear-view camera image during the backing event. In the letter, Volvo stated that “limited access to the rear-view camera image increases the risk of crash.” Volvo further stated in its letter that an over-the-air software update was available for a download to correct this safety defect.

50. On July 17, 2025, Ms. Leonberg, as instructed, downloaded and installed Volvo’s software upgrade 3.7.

51. However, the infotainment system continued to malfunction despite the software update. After the update, the rear-view camera still fails to consistently activate when reversing, turn signal indicator sound and audible alerts intermittently stop working, and on some occasions, the key fob failed to unlock the vehicle.

52. On August 25, 2025, with her vehicle’s odometer reading about 30,496 miles, Ms. Leonberg returned her vehicle to Germain Volvo, complained about the malfunction still occurring with her infotainment system, and the rear-view camera still failing to activate at times, and asked for a repair. Germain Volvo responded there were no software updates available for her car and, citing absence of related trouble codes, undertook no repair.

53. On November 12, 2025, Ms. Leonberg, through her counsel, sent a letter to Volvo advising it that the Leonberg Vehicle suffers from the Infotainment Defect that Volvo and their authorized dealership failed to repair.

54. To date, the Leonberg Vehicle remains unrepaired, continues to suffer from the Infotainment Defect, and impedes Plaintiff’s ability to safely operate her car.

## **FACTUAL ALLEGATIONS APPLICABLE TO PLAINTIFF AND THE CLASS**

### **I. Volvo's AAOS-based Infotainment System**

55. Beginning in the September 2020, Volvo introduced a new infotainment and vehicle-control platform in its vehicles based on Android Automotive Operating System.<sup>4</sup>

56. The AAOS-based infotainment system consists of a large LCD touchscreen mounted in the center dash. The screen is the gateway between the user and the vehicle's safety, navigation, communications, entertainment, climate control, and other features.



57. Volvo states its AAOS-based infotainment system “is defined by a user-friendly interface and unparalleled connectivity,” and aims “[t]o give customers the same experience that they are used to on their phones, but adapted for hands-free interaction while driving.”<sup>5</sup>

58. The AAOS-based infotainment system – which replaced an older Sensus infotainment system – is not merely an add-on (like a phone-CarPlay mirror), but rather the

<sup>4</sup> <https://www.volvocars.com/intl/media/press-releases/3D3969ED7CDC8B4E/> (last visited Dec. 10, 2025).

<sup>5</sup> *Id.*

native software platform for navigation, media, vehicle controls, climate, including defrosters and defoggers, and – for electric vehicles – charging management. The reliability, stability, and security of the AAOS-based infotainment system is deeply intertwined with the core functioning of the vehicle.

59. Volvo first deployed its new AAOS-based infotainment system in the XC40 Recharge, the electric version of the XC40, beginning with the 2021 model year.

60. Beginning with the 2022 model year, Volvo introduced the AAOS-based infotainment system in the remainder of their model line-up: C40, XC40, XC60, XC90, S60, S90, V60, V90 models, and other models.

61. Similarly, Volvo’s affiliate Polestar Automotive USA Inc. has used the AAOS-based infotainment system in its Polestar 2 vehicles since its launch in July 2020.

62. The AAOS-based infotainment system relies on continuous software updates, including over-the-air updates, for the operation, maintenance, and modification of system features.

63. In September 2024, Volvo announced that for vehicles equipped with the AAOS-based infotainment system, Volvo would deliver an upgraded “new-generation user experience” “to millions of Volvo drivers around the world with a simple over-the-air software update” that includes newer layout and interface updates.<sup>6</sup>

64. Because Class Vehicles’ AAOS-based infotainment system governs a substantial portion of the user-facing controls and interfaces, the performance, reliability, and safety of many everyday vehicle functions depend on the proper operation of the AAOS-based

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<sup>6</sup> <https://www.volvocars.com/intl/media/press-releases/91619727D8B879F6/> (last visited Dec. 10, 2025).

infotainment system and its associated services. Any defects, malfunctions, or deficiencies in the AAOS-based infotainment system implementation or operation (software bugs, update failures, latency, user-interface flaws, crashes, connectivity problems) therefore directly degrade essential driving, safety, convenience, or charging functions – affecting Class Vehicles owners and lessees.

65. Volvo have sold hundreds of thousands of the Class Vehicles across the United States and in the Commonwealth of Pennsylvania.

66. Volvo have affirmatively represented that their Class Vehicles are safe<sup>7</sup> and boasted earning the Top Safety ratings from the Insurance Institute of Highway Safety.<sup>8 9</sup>

67. On their website Volvo tout “Safety is in our DNA” and they “develop cars to be equally safe for everyone.”<sup>10</sup>

## **II. The Infotainment Defect**

68. The Class Vehicles suffer from unsafe Infotainment Defect.

69. The AAOS-based infotainment system used in the Class Vehicles is defective due to pervasive software bugs and failures in the design, development, testing, and validation of the Android Automotive Operating System that is unstable, improperly calibrated to the vehicles’ hardware, including the Integrated Center Display, the rear-view camera module, and the vehicle’s control modules. The system’s flawed software architecture and deficient update

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<sup>7</sup> <https://www.volvocars.com/us/safety/overview/> (last visited Dec. 10, 2025).

<sup>8</sup> See e.g. <https://www.volvocars.com/us/media/press-releases/8ECACFDB600670E3/> (last visited Dec. 10, 2025) (“The fully electric Volvo C40 Recharge compact SUV has earned the coveted 2022 *TOP SAFETY PICK+* (TSP+) award from the Insurance Institute of Highway Safety”).

<sup>9</sup> See e.g. <https://www.volvocars.com/us/media/press-releases/A053C568FCE506DF/> (last visited Dec. 10, 2025) (“Volvo XC90 and XC90 Recharge Plug-in Hybrid Named 2023 IIHS *TOP SAFETY PICK+* Award Winners”).

<sup>10</sup> <https://www.volvocars.com/us/safety/legacy/> (last visited Dec. 10, 2025).

processes cause instability, improper initialization, and breakdowns in error handling, resulting in the center display, rear-view camera, climate controls, navigation, and other vehicle functions freezing, crashing, or failing to load during normal operation (the “Infotainment Defect” or “Defect”).

70. These AAOS-based infotainment system failures are triggered by ordinary software events such as start-up, sleep-cycle transitions, connectivity and sensor polling, and over-the-air update processes.

71. Because essential safety-related functions – including the rear-view camera required by FMVSS No. 111 – depend on the proper operation of this integrated software platform, any disruption or crash in the AAOS-based infotainment system results in a loss of critical visibility, non-responsive controls, and a black or blank center display.

72. Volvo attempted to mask these systemic deficiencies through serial software patches and over-the-air updates, but these efforts did not correct the underlying defects, which continue to cause intermittent, unpredictable, and unsafe failures of the infotainment and rear-view camera systems in the Class Vehicles.

73. The Infotainment Defect presents a safety hazard that renders the Class Vehicles unreasonably dangerous to consumers. The AAOS-based infotainment system is not merely a convenience feature but the operational hub for essential driving functions, including the federally required rear-view camera, navigation guidance, climate controls, vehicle status displays, audio controls, and – in electric models – charging and drive-mode information. When the system freezes, goes blank, or otherwise malfunctions, these functions become unavailable, forcing the Class Vehicle drivers to operate their vehicles without critical visual information and

without access to controls – such as windshield defrosting and defogging – normally required to drive safely.

74. Moreover, when the system malfunctions while the vehicle is in motion, the Class Vehicles drivers are compelled to divert their attention from the road in an effort to diagnose the failure, attempt a reboot, or manipulate unresponsive controls. This involuntary distraction significantly increases the risk of a crash. The danger is magnified when the AAOS-based infotainment system fails during reversing maneuvers, where the loss of the rear-view camera deprives the Class Vehicles drivers of visibility and exposes occupants, pedestrians, and nearby vehicles to heightened risk. Because the defect manifests unpredictably and without warning, drivers cannot anticipate or mitigate its effects, rendering the Class Vehicles unsafe to operate under normal driving conditions.

75. Further, Volvo failed to repair the Infotainment Defect under their written warranty when given a reasonable opportunity to do so, or replaced buggy software in the defective AAOS-based infotainment system with the same defective software that fails to cure the Defect.

76. Volvo have long known that their AAOS-based infotainment systems freeze and become unresponsive when in operation. For instance, Volvo admitted that they had begun receiving internal reports that the rear-view camera image would fail to appear in the AAOS-based infotainment system vehicles as early as April 2021.<sup>11</sup>

77. However, other than issuing a NHTSA Recall 25V-282 on April 30, 2025, to remedy the rear-view camera failure, Volvo have not issued any recalls or bulletins to their

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<sup>11</sup> <https://static.nhtsa.gov/odi/rc1/2025/RCLRPT-25V282-3568.PDF> (last visited December 12, 2025).

dealerships regarding the Class Vehicle's defective AAOS-based infotainment systems or repairing the same.

78. The Infotainment Defect can and often does manifest immediately after Class Members take ownership of the vehicles and Class Vehicles owners, including the Plaintiff, have complained that they experienced the Infotainment Defect within weeks of acquiring their vehicles:

- NHTSA Complaint No. 11447254 (2022 Volvo XC60), January 12, 2022: Volvo rushed the 2022 model year XC60 with the new Google infotainment to market before all the bugs were worked out. **While driving after 4 weeks of ownership,** the HVAC was not working so unable to defog the windshield, the turn signal lights were not working, maps and speed limit alerts not working. Had to manually reboot the infotainment to regain these necessary safety features. There are numerous internet forums describing issues with the new Google based infotainment that Volvo is using and the slow response to address them. Even the dealer is aware of these reported issues.

79. Furthermore, when Volvo attempt to remedy the Infotainment Defect through software updates, they simply replace one defective software version with another, leaving the underlying defect unresolved:

- NHTSA Complaint No. 11469464 (2022 Volvo XC60), June 9, 2022: The contact owns a 2022 Volvo XC60. The contact stated while driving at various speeds or while the vehicle was idling, the Lane Departure, cross-traffic, and several other functions failed to operate as designed. The contact stated that a Cooling Environmental Failure message was displayed. The vehicle was taken to the dealer where it was awaiting diagnostic and repair. The manufacturer was made aware of the failure via email and the contact was awaiting a response. The contact stated there was an Over the Air (OTA) software update on the vehicle. **The contact stated that after the OTA software update was completed the failure occurred.** The contact stated that the Volvo phone App alerted that the update was completed successfully. The failure mileage was unknown.
- NHTSA Complaint No. 11514260 (2022 Volvo XC60), March 28, 2023: **The vehicle performed an over the air update which failed.** The vehicle became inoperable. The vehicle was force started with dash lights indicating multiple

system failures. The infotainment system has crashed multiple times rendering climate control non usable. A loaner 2023 XC60 was provided which also resulted in the infotainment center crashing twice. Dealership acknowledged the issue but has no solution for the issue. My concern is there is no guarantee the other safety features are functioning correctly if the most simple electrical component of the vehicle is failing.

- NHTSA Complaint No. 11674057 (2022 Volvo XC60), July 16, 2025: Manufacturer Recall Number R10320 NHTSA Recall Number 25V282 **the recall for "Camera is Temporarily Not Available" was preformed at dealer on Monday 7/14/2025 today the same message appear on the display screen when I went to backup in a parking lot.** Software version shows it as unto date in settings 3.7.##.

80. Volvo had and have a duty to fully disclose the true nature of the Infotainment Defect and the associated repair costs to Class Vehicles owners, among other reasons, because the Defect poses an unreasonable safety hazard, because Volvo had and have exclusive knowledge or access to material facts about the Class Vehicles' AAOS-based infotainment systems that were and are not known to or reasonably discoverable by Plaintiff and the other Class Members, and because Volvo have actively concealed the Infotainment Defect from its customers.

81. As a result of Volvo's failure to disclose and repair the Infotainment Defect, Plaintiff and Class Members will continue to incur out-of-pocket costs for repeated software updates in an attempt to repair the Defect after their respective Volvo-issued warranty coverages expire. Indeed, one Class Vehicle owner complained of paying \$225 for a "rear camera not coming on in reverse update," and "\$225 for a complete software update," and incurring "about \$700+ for software updates to correct issues."<sup>12</sup>

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[https://www.reddit.com/r/Volvo/comments/16cr5j5/anyone\\_else\\_tired\\_of\\_paying\\_for\\_software\\_updates/](https://www.reddit.com/r/Volvo/comments/16cr5j5/anyone_else_tired_of_paying_for_software_updates/) (last visited Dec. 12, 2025).

### **III. Volvo's Knowledge of the Defect**

82. Soon after launch of the AAOS-based infotainment system in the Class Vehicles, owners began reporting blank or non-responsive center displays and infotainment systems that failed to start, requiring repeat reboots.

83. Before Volvo sold Plaintiff her Class Vehicle, Volvo were on notice that the Class Vehicles suffered from the Infotainment Defect, however Volvo failed to disclose the existence of the defect to Plaintiff or any other Class Vehicle owner.

84. Volvo became aware of the Infotainment Defect through sources not available to Plaintiff and Class Members, including, but not limited to, pre-production testing, pre-production design failure mode and analysis data, production design failure mode and analysis data, early consumer complaints made exclusively to Volvo's network of dealers and directly to Volvo, aggregate warranty data compiled from Volvo's network of dealers, testing conducted by Volvo in response to consumer complaints, and repair order data received by Volvo from Volvo's network of dealers.

85. On information and belief, during the pre-release process of designing, developing, integrating, and validating the AAOS-based infotainment system for the Class Vehicles – processes that necessarily occurred prior to the commencement of sales – Volvo would have gained comprehensive and exclusive knowledge of the system's architecture, software limitations, and failure modes. Through internal software development, bench testing, vehicle integration testing, durability and environmental testing, and pre-production validation, Volvo necessarily learned how the Android Automotive Operating System interacted with the vehicles' hardware components, including the integrated center display, rear-view camera module, control modules, sensors, and communications systems, how the system behaved during

start-up, sleep-wake cycles, connectivity changes, and over-the-air update processes, the circumstances under which the system would freeze, crash, reboot, or fail to initialize, and the cascading effects those failures would have on safety-critical functions. Volvo also would have learned that these failures would recur under normal and foreseeable driving conditions and could not be reliably corrected through software updates alone.

86. An adequate pre-release analysis of the design, software architecture, engineering, and real-world utilization of the AAOS-based infotainment systems in the Class Vehicles would have revealed to Volvo that, as a result of the system's flawed software architecture, insufficient validation, improper integration with vehicle hardware, and buggy software, the AAOS-based infotainment system was not reliable or fit for its intended use. Such pre-release testing would have shown that the system was prone to freezing, crashing, failing to initialize, and becoming unresponsive during ordinary and foreseeable driving conditions, including start-up, sleep-wake cycles, and normal vehicle operation. Thus, during the pre-release analysis stage, Volvo would have known that the AAOS-based infotainment systems installed in the Class Vehicles were defective, would disable safety-related functions such as the rear-view camera, climate controls, and driver alerts, and would pose a safety risk to owners, lessees, and the motoring public. Despite this knowledge, Volvo failed to correct the defective software architecture and software bugs before placing the Class Vehicles into production and selling them to consumers.

87. Volvo also learned about the Infotainment Defect because of the higher-than-expected number of warranty claims submitted by Volvo's dealerships to Volvo, which alerted Volvo that the AAOS-based infotainment systems are defective. Therefore, Volvo have detailed and accurate data regarding the number and frequency of software update orders, including dealer warranty claims pertaining to repair of the AAOS-based infotainment systems. The

ongoing submission by dealerships of the warranty claims relating to repair of the AAOS-based infotainment systems and the fact that such claims were submitted at such high rates (compared to warranty repairs for non-AAOS-based infotainment systems), was known to Volvo and would have alerted Volvo that their AAOS-based infotainment systems were defective and posed a safety risk early on.

88. Volvo also knew about the Infotainment Defect because numerous consumer complaints regarding the AAOS-based infotainment systems were made directly Volvo and their dealerships. The large number of complaints, and the consistency of their descriptions of the AAOS-based infotainment systems crashing and rear-view camera failing to come on alerted Volvo to this serious Defect affecting the Class Vehicles. The full universe of complaints made directly to Volvo about the Infotainment Defect is information presently in the exclusive custody and control of Volvo and is not yet available to Plaintiff prior to discovery. However, upon information and belief, many Class Vehicle owners, including the Plaintiff, complained directly to Volvo and their dealerships and service centers about the ongoing defects with the infotainment system in their vehicles.

89. Indeed, Volvo admitted that by April 2021, Volvo had begun receiving internal reports that the rear-view camera image would fail to appear in AAOS-based infotainment system vehicles.<sup>13</sup>

90. In an attempt to remedy the Infotainment Defect, Volvo issued numerous software updates that failed to resolve serious nonconformities with the AAOS-based infotainment system in the Class Vehicles.

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<sup>13</sup> <https://static.nhtsa.gov/odi/rc1/2025/RCLRPT-25V282-3568.PDF> (last visited December 12, 2025).

91. Furthermore, many Class Vehicle owners complained the Volvo's over-the-air infotainment system software updates often crashed, necessitating numerous dealership visits.

92. In response to such complaints, Volvo published in October 2024 an official support instructions applicable to "all cars" with the AAOS-based infotainment system, directing customers to force-restart the AAOS-based infotainment system by holding the Home button for 20 seconds until the center display turns off and the Volvo logo reappears. Volvo further advised that this procedure "might need to be performed more than once to be effective."<sup>14</sup>

93. During late 2024 and early 2025, Volvo rolled out multiple additional software updates for the AAOS-based infotainment system, which Volvo described in their official release notes as providing "general stability improvements," "other improvements," and expanded remote-function capabilities.<sup>15</sup>

94. These AAOS-based infotainment system updates were delivered partly over-the-air and partly through dealerships. Yet, despite such repair attempts, the Class Vehicles owners continued to report that even after such updates their vehicles continued to experience black center screens, sluggish maps, audio and connectivity issues, and rear-viewcamera errors, thus indicating that Volvo's software changes did not fully resolve the Infotainment Defect.<sup>16</sup>

95. On April 30, 2025, Volvo submitted a formal Part 573 Safety Recall Report (NHTSA Recall 25V-282, internal reference R10320) for 413,151 vehicles, including model-year 2021-2025 XC40, 2022-2025 XC60, and 2023-2025 XC90, all equipped with the AAOS-

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<sup>14</sup> <https://www.volvocars.com/lb/support/topic/b34f02c4d48addecc0a801512c8f5561> (last visited December 12, 2025).

<sup>15</sup> <https://www.volvocars.com/lb/support/car/ex40/software-release-notes> (last visited December 12, 2025).

<sup>16</sup> [https://www.reddit.com/r/VolvoRecharge/comments/1ltk5gv/anyone\\_else\\_lose\\_their\\_drivers\\_display\\_after\\_fw/](https://www.reddit.com/r/VolvoRecharge/comments/1ltk5gv/anyone_else_lose_their_drivers_display_after_fw/) (last visited December 12, 2025).

based infotainment system.<sup>17</sup> Volvo admitted that in these vehicles the “Rear-view camera image does not show during the start of each backing event,” in violation of FMVSS 111, because “a fault code may be set under certain conditions, which could result in the backup camera image to not be available for the rest of the driving cycle.” Volvo attempted to remedy this condition by issuing another software update, to be installed either at dealers or over-the-air.

96. Recall 25V-282 was limited to Volvo’s attempt to remedy the rear-view camera issue and did not address Class Vehicle owners’ complaints that the AAOS-based infotainment systems continued to exhibit black center screens, sluggish maps, unresponsive climate controls, connectivity problems, and other symptoms of the Infotainment Defect.

97. In the Spring and Summer 2025 Volvo released software version 3.5.14 (April 22, 2025) and 3.5.24 / 3.5.27 (June 2, 2025) for the AAOS-based infotainment systems describing these as containing “tweaks and fixes” and “improvements and bug fixes,” with some updates only available at the dealerships and others via over-the-air download.<sup>18</sup>

98. Following these updates the Class Vehicles owners reported that the Infotainment Defect persisted and, in some cases, new issues appeared.<sup>19</sup> For example, the Class Vehicles owners reported that after such software updates the driver-display map refresh lagged, interior lights failed to come on when opening a door, and some center screens still went black or

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<sup>17</sup> <https://static.nhtsa.gov/odi/rc1/2025/RCLRPT-25V282-3568.PDF> (last visited December 12, 2025).

<sup>18</sup> <https://www.volvocars.com/lb/support/car/s60/software-release-notes/> (last visited December 12, 2025).

<sup>19</sup> <https://www.facebook.com/share/p/1F3TPGYwJz/> (last visited December 12, 2025).

partially blank, forcing additional reboots.<sup>20 21 22</sup> These accounts are consistent with a pattern of incremental software patches that failed to resolve the Infotainment Defect.

99. In mid-2025, concerns emerged regarding the safety implications of software-driven recalls and the over-the-air updates on the Class Vehicles' AAOS-based infotainment systems, where a 2025 XC90 plug-in hybrid experienced a brake-failure incident shortly after receiving a software update linked to a prior rear-view camera recall, prompting the vehicle to accelerate downhill with ineffective brakes until it crashed off-road.<sup>23</sup> Shortly thereafter, Volvo issued an urgent recall for approximately 11,469 Volvo EV and PHEV vehicles, to correct this software flaw that caused brakes to fail.<sup>24</sup>

100. These events underscore that the software updates intended to remedy the Infotainment Defect themselves introduced new safety-critical defects, further eroding the Class Vehicles owners confidence in the reliability of their vehicles equipped with the AAOS-based infotainment system.

#### **IV. The NHTSA Complaints and Online Discussions of the Defect**

101. Upon information and belief, thousands of purchasers and lessees of the Class Vehicles have experienced the Infotainment Defect. Given how widespread the issue is and the fact that Infotainment Defect manifests within weeks of the Class Vehicles sale, Class Vehicles

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<sup>20</sup> <https://www.facebook.com/share/p/1A7FeXn9nc/> (last visited December 12, 2025).

<sup>21</sup> [https://www.reddit.com/r/Volvo/comments/1phcd5t/seriously\\_whats\\_wrong\\_with\\_the\\_infotainment\\_system/](https://www.reddit.com/r/Volvo/comments/1phcd5t/seriously_whats_wrong_with_the_infotainment_system/) (last visited December 12, 2025).

<sup>22</sup> <https://insideevs.com/news/770572/volvo-software-issues-unacceptable-ex90/> (last visited December 12, 2025).

<sup>23</sup> <https://www.wsj.com/business/autos/a-steep-mountain-drive-a-brake-failure-and-a-volvo-recall-5374b21c> (last visited December 12, 2025).

<sup>24</sup> <https://www.roadandtrack.com/news/a65438475/nhtsa-issues-urgent-brake-failure-warning-for-certain-volvo-evs-and-phevs/> (last visited December 12, 2025).

owners have been complaining about the Infotainment Defect directly to Volvo since 2021 and have been posting such complaints online since at least since early 2022.

102. Automobile manufacturers and distributors, including Volvo, regularly monitor social media for vehicle owners concerns. Upon information and belief, Volvo maintain presence on and regularly monitor social media for such content too, have done so since they began selling the Class Vehicles, and published social media user guidelines on their website.<sup>25</sup>

103. Through their monitoring of social media, Volvo learned about the Defect.

104. Soon after launch of the AAOS-based infotainment system in the Class Vehicles and in the Polestar 2 vehicles equipped with the same AAOS-based infotainment system, the vehicles owners began reporting blank or non-responsive center displays and infotainment systems that failed to start, requiring repeated reboots. In September 2021, a Polestar 2 owner reported “no connection to infotainment” and a blank central screen that persisted even after attempted resets, pending a software refresh.<sup>26</sup> Polestar forum discussions in 2022 describe owners being “frustrated with the infotainment system,” complaining of the rear-view camera failing to come on when reversing, and noting that many malfunctions were only temporarily resolved by performing a 20-second hard reboot of the screen while driving.<sup>27</sup>

105. Similar complaints appear as early as 2022 in other Class Vehicles owner forums and Reddit threads referencing black screens, frozen displays, and the need for repeated reboots in Volvo models equipped with the AAOS-based infotainment system. For instance, on Reddit,

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<sup>25</sup> <https://www.volvocars.com/us/legal-policies/privacy/website-privacy-notice/> (last visited December 12, 2025).

<sup>26</sup> <https://www.polestar-forum.com/threads/no-connection-to-infotainment.3542> (last visited December 12, 2025).

<sup>27</sup> <https://www.polestar-forum.com/threads/so-frustrated-with-the-infotainment-system.8720> (last visited December 12, 2025).

Volvo Class Vehicles owners shared they frustrations with the AAOS-based infotainment system: several owners complained of being unable to use navigation, while other owners chimed in sharing their experiences of infotainment system freezing, over-the-air updates failing to install, and need for repeat system reboots.<sup>28 29</sup> Likewise, on the Volvo vehicles enthusiast forums, the Class Vehicles owners complained of faulty infotainment system and inability to operate climate controls.<sup>30 31</sup>

106. Through 2022 and 2023, the Class Vehicle owners continued to report frozen center displays, black screens, laggy operation, rear-view camera errors, and need for constant system resets on online forums and social media.<sup>32 33</sup> Similarly on Reddit, the Class Vehicle owners referred to the AAOS-based infotainment system as “still very much a work in progress” and complained of frequent system crashes, inoperative features, and need for frequent reboots.<sup>34</sup>

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[https://www.reddit.com/r/Volvo/comments/voaieX/22\\_xc60\\_infotainment\\_system\\_freezing\\_and/](https://www.reddit.com/r/Volvo/comments/voaieX/22_xc60_infotainment_system_freezing_and/) (last visited December 12, 2025).

<sup>29</sup> [https://www.reddit.com/r/Volvo/comments/13hicsk/google\\_infotainment\\_black\\_screen/](https://www.reddit.com/r/Volvo/comments/13hicsk/google_infotainment_black_screen/) (last visited December 12, 2025).

<sup>30</sup> <https://volvoforums.com/forum/volvo-xc60-51/2022-xc60-no-heat-infotainment-down-112304/> (last visited December 12, 2025).

<sup>31</sup> <https://volvoforums.com/forum/volvo-xc60-51/infotainment-screen-fades-black-interior-lighting-111614/> (last visited December 12, 2025).

<sup>32</sup> <https://volvoforums.com/forum/volvo-xc60-51/xc60-2022-nothing-but-problems-107343/> (last visited December 12, 2025).

<sup>33</sup> <https://volvoforums.com/forum/volvo-xc60-51/black-center-screen-aaos-114460/> (last visited December 12, 2025).

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[https://www.reddit.com/r/Volvo/comments/11fh9yj/what\\_has\\_been\\_your\\_experience\\_with\\_the\\_google/](https://www.reddit.com/r/Volvo/comments/11fh9yj/what_has_been_your_experience_with_the_google/) (last visited December 12, 2025).

<sup>35</sup> [https://www.reddit.com/r/Volvo/comments/113tmst/instrument\\_panel\\_and\\_hud\\_shut\\_off/](https://www.reddit.com/r/Volvo/comments/113tmst/instrument_panel_and_hud_shut_off/) (last visited December 12, 2025).

107. In addition, the Class Vehicles owners have been complaining about the Infotainment Defect on Facebook. For instance, on December 21, 2023, one Volvo XC40 Class Vehicle owner published a post asking whether “anyone experienced their infotainment system just decide to stop working suddenly.”<sup>36</sup> In response to original poster’s question, several other Class Vehicles owners provided guidance to reset the system and shared them experiencing the same problem. Likewise, many Class Vehicles owners shared their frustrations with the AAOS-based infotainment system on the Facebook group devoted to the Volvo’s AAOS-based infotainment system that includes over 16,000 members.<sup>37</sup>

108. Moreover, Volvo monitor customers’ complaints made to the National Highway Traffic Safety Administration. Federal law requires automakers like Volvo to be in close contact with NHTSA regarding potential auto defects, including imposing a legal requirement (backed by criminal penalties) compelling the confidential disclosure of defects and related data by automakers to NHTSA, including field reports, customer complaints, and warranty data. *See* TREAD Act, Pub. L. No. 106-414, 114 Stat.1800 (2000).

109. Automakers also have a legal obligation to identify and report emerging safety-related defects to NHTSA under the Early Warning Reporting Requirements. *Id.* Similarly, automakers monitor NHTSA databases for consumer complaints regarding their automobiles as part of their ongoing obligation to identify potential defects in their vehicles, including safety-related defects. *Id.* Thus, Volvo knew or should have known of the many complaints about the Infotainment Defect logged by NHTSA Office of Defects Investigation, and the content,

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<sup>36</sup> <https://www.facebook.com/share/p/1CxbDdfD6j/> (last visited December 10, 2025).

<sup>37</sup> <https://www.facebook.com/share/g/1FbdBpsVSP/> (last visited December 10, 2025).

consistency, and large number of those complaints alerted, or should have alerted, Volvo to the Infotainment Defect.

110. The below example of complaints concerning the Class Vehicles, filed by consumers with the NHTSA and posted on the Internet, which on information and belief Volvo actively monitored during the relevant time period, demonstrate that the Defect is widespread and dangerous, and that Volvo have known about the defect at all relevant times:

- NHTSA Complaint No. 11447254 (2022 Volvo XC60), January 12, 2022: Volvo rushed the 2022 model year XC60 with the new Google infotainment to market before all the bugs were worked out. While driving after 4 weeks of ownership, the HVAC was not working so unable to defog the windshield, the turn signal lights were not working, maps and speed limit alerts not working. Had to manually reboot the infotainment to regain these necessary safety features. There are numerous internet forums describing issues with the new Google based infotainment that Volvo is using and the slow response to address them. Even the dealer is aware of these reported issues.
- NHTSA Complaint No. 11459481 (2022 Volvo XC60), April 2, 2022: Multiple occurrences: The screen goes blank in front of the driver including the main center on the dash. The car simply stops working and slows down to a crawl showing a turtle symbol on the dash. To reset, the vehicle has to be completely shut down and restarted. The ventilation system stops working and required a reset. The Google operating system which controls everything in the vehicle is a failure. This vehicle should have never been released for sale and Volvo should have told their many customers that the 2022 XC60 had serious issues before the sale.
- NHTSA Complaint No. 11469166 (2022 Volvo XC60), June 9, 2022: Continuous problems associated with the computer of the car that are affecting its ability to drive safely. While in reverse and in motion, the car's camera will often, an unpredictably, shut off. Additionally, the car's forward collision warning system will initiate when there are no cars in front of; rather, it sometimes engages when oncoming traffic going the opposite direction. Lastly, the car lost all power while on the highway due to a "battery error". It required a redownload of software; however, these other safety problems persist.
- NHTSA Complaint No. 11469464 (2022 Volvo XC60), June 9, 2022: The contact owns a 2022 Volvo XC60. The contact stated while driving at various speeds or

while the vehicle was idling, the Lane Departure, cross-traffic, and several other functions failed to operate as designed. The contact stated that a Cooling Environmental Failure message was displayed. The vehicle was taken to the dealer where it was awaiting diagnostic and repair. The manufacturer was made aware of the failure via email and the contact was awaiting a response. The contact stated there was an Over the Air (OTA) software update on the vehicle. The contact stated that after the OTA software update was completed the failure occurred. The contact stated that the Volvo phone App alerted that the update was completed successfully. The failure mileage was unknown.

- NHTSA Complaint No. 11473278 (2022 Volvo XC60), July 11, 2022: Started car after driving an hour, and having it sit 2.5 hours. Center panel was very dim and no air out of vents despite leaving air on when turned off. Error Message that cooling infotainment system. Audio sound for turn signal also not working Had to drive/leave. Left and found somewhere safe to pull over turn car off and sit. After 10+min no change. Drove home 60miles with no AC, cruise control or other safety features, or sounds w blinkers. At home, the beeping for 360 camera and red/orange lights to help backup/part not functioning. The backup Light was. Car felt a little jerky during trip. After 4+ hours it appeared to be functioning. When restarted Car is 5-6 weeks old with 346 miles on it Including the 100+ from Saturday. Did not make a planned drive Sunday as did not feel it was safe. Verified all software/apps up to date Vm left for service on Saturday will follow up on opening today.
- NHTSA Complaint No. 11473276 (2022 Volvo XC60), July 11, 2022: 4 day old car with 45 miles on it wouldn't unlock-manually unlocked the car to find it wouldn't start/no power. Car was towed to dealer after being jump started. Software error caused application downloads or refreshes to continually run draining the battery which needed to be replaced entirely.
- NHTSA Complaint No. 11475194 (2021 Volvo XC40), July 21, 2022: Backup camera fails intermittently at least a dozen times, error message "camera unavailable". Camera icon disappears from dash. Took to dealer. No code, no problem. Backed up and worked, did not understand intermittently?! Asked tech to report to Volvo, got push back. I advised I was reporting as safety failure to SaferCar and they report to Volvo. Suspect was not reported to Volvo. When camera fails other rear safety systems are inoperable.
- NHTSA Complaint No. 11475060 (2022 Volvo XC60), July 21, 2022: The google android automotive operating system is unstable. It will reboot while driving. During this time all Settings and functions of the car including safety

systems are rebooted as well. For about 30-60 seconds the cars systems are unavailable even the HVAC. I've had it serviced twice and they have been unable to fix the issue. The cars data/cell connection also does not work and is required for the SOS and Volvo On Call systems. It is currently at the dealership with no estimated time of when they can fix as they have exhausted all possible ways to fix. A case is active with Volvo to work to find the issue to the problem. They replaced the cars modem but data is still not working and updated the software but the glitches and issues with the android automotive remain.

- NHTSA Complaint No. 11478229 (2021 Volvo XC40), August 8, 2022: Vehicle systems, navigation, entertainment, heating, a/c, defrosting are dependent on Internet connection. The Internet connection shows connection, but no systems are available. Vehicle is operable, but driver distraction increases 10 or 20 fold trying to do simple tasks such as defrost windshield. Rather than being available upfront, so to speak, items are hidden in layers of menus. Unlike other vehicles in which voice command is an internal function, on the Volvo this is an Internet function, rather like Amazon Alexa. This is an accident waiting to happen. To restart system requires exiting and locking/unlocking Vehicle. Dealer said fixed with software update. Update did not fix.
- NHTSA Complaint No. 11494317 (2022 Volvo V90), November 20, 2022: My car has a Google system which fails to operate correctly & needs many system reboots. I've presented the shut problem to the service dept, I'm told they don't know what to tell me because they can't recreate the problem or the car's system is like phones, it freezes at times & needs to be rebooted, Volvo is constantly doing software updates. Nov 14 I was driving on the highway w/the heat & wipers on. It was raining lightly. In a matter of seconds my side front windows fogged up & then the windshield completely did too. I tried to turn on my defroster but it didn't work. The system was frozen again. I quickly wiped in front of me so I could see where I was going, but I couldn't keep up. The fog just kept covering the windshield. I was in the middle lane going 65 miles hr. I took my foot off the gas & opened my window. I put my blinker on & tried to move over to the side of the road. People were beeping at me & all I could see was out the side window. As I got close to the side of the road I almost smashed into the large exit sign. I was driving almost blind. I called my son asking him how to reboot the system. He worked for the car place. I had to shut the system down & reboot. When it came back up the defroster came on clearing the windshield/windows immediately. I went to the dealership, told them what happened, how I almost had a catastrophic accident, I don't feel safe in the vehicle, I've been complaining about multiple problems & I want out of my lease. The manager asked me questions, if my air-conditioning button was on which it was & told me again how the Google system

in the car is like phones & needs to be rebooted, they are working on software updates & offered to make my next 2 car payments for me for my inconvenience! I went back to the car place the next day bc my cruise control only works intermittently I wasn't going to report it. the service manager told me there is no reason to have my defroster off. I made another appt for service. I don't feel safe in this ca.

- NHTSA Complaint No. 11495468 (2022 Volvo XC40), November 30, 2022: The GPS continues to stop working, it states it is "searching for GPS". It has been to the dealership three different times for this software malfunction with no resolution.
- NHTSA Complaint No. 11495523 (2023 Volvo XC60), November 30, 2022: The headlights malfunctioned two weeks after I purchased the vehicle. The center control panel electronics that controls heating and cooling, the phone, etc failed suddenly and without warning while I was on the highway. There have been multiple problems with this vehicle since I purchased it on September 19. It has been in the shop for about 15 days. A propulsion system warning appeared without warning while I was driving the car. The battery drained for unknown reasons while plugged in to charge. This is not a safe car. It is controlled by an electronics system and software that are not reliable, leaving me at risk of being in an accident or stranded somewhere. I have read that some of these vehicles go into "turtle mode" and won't go over about 5mph after the propulsion system warning has appeared. I do not want to be driving this on a highway and lose all acceleration. I do not want to stop at a rest stop at night and have my car not start. There is clearly something quite wrong with the operating software and electronics that this vehicle depends upon. It is quite apparent that Volvo's nascent software development team has adopted the "move fast and break things" philosophy espoused by many software companies. The key distinction here is that when my computer software crashes, I am sitting at my desk chair. With an automobile, the crash could very well happen at 65 mph or with me stuck in some remote location. The idea that Volvo would roll out a product so miserably deficient of basic capabilities is mendacious.
- NHTSA Complaint No. 11499450 (2022 Volvo XC60), December 29, 2022: The screen does not come on, so no heat, no safety stuff, no reverse camera and no sensors. All the above ADAS features do not work either. This is definitely a safety hazard, which I think traces back to the vehicle operating system. Details reported to Volvo in this tweet-->  
<https://twitter.com/ameyaroskar/status/1608642311923339266?t=CUI77cpdg6qWIP8AJqetyQ&s=19>.

- NHTSA Complaint No. 11499307 (2022 Volvo XC60), December 29, 2022: infotainment system quits working or will not boot up.
- NHTSA Complaint No. 11502952 (2022 Volvo XC60), January 21, 2023: I have had several software/computer issues since purchase. Now the whole control system has failed and all safety functions are dead, in addition to radio, heating/cooling and voice command systems.
- NHTSA Complaint No. 11503641 (2022 Volvo XC60), January 25, 2023: Picked the vehicle up from dealership, rapidly received errors in May 2022. Errors as follows; Blind Spot Sensor service required, rear auto brake reduced functionality, park assist system reduced functionality, vehicle had less than 15 miles. A different incident in May, the AC wouldn't work and had to shut down and reset screen. July 2022, car would not start with either key, confirmed both keys working. Would not recognize key or respond to app, eventually radio would come on but car wouldn't crank. Dealership updated software. August 2022, GPS kept dropping and continued issues with electrical, TCAM module replaced.
- NHTSA Complaint No. 11504963 (2022 Volvo XC60), February 1, 2023: The Google/Android (IHU) electrical system controls the entire car: brakes, engine, safety features, AC/Heat, etc. It is unreliable after 4 repair attempts. Problems started date of delivery (9/6/22) & have been ongoing. The ones that directly affect safety are the auto braking activating without cause, blind spot warning missing motorcycles, lane keeping will pull car towards a hazard in middle of road when you swerve to avoid it and the Google/Android system in general malfunctioning. I live in south Florida and I can assure you that air conditioning is a safety concern, especially in people like me who have medical conditions in which excessive heat exposure can result in an ER visit. My AC has failed upon starting the car as well as following the rebooting of the Google/Android system. The rebooting of the system must be done whenever the system malfunctions & it is wise to pull off the road to do it because everything but engine shuts down during the procedure. I have had to do this several times sitting off the side of the road & the system still wasn't working. It is not safe to have to pull off road so frequently. The automatic braking was particularly frightening, as both I and the car in front of me were both slowing for a stoplight, there was at least 5 car lengths between us & the distance between us was not narrowing. My car suddenly braked. Had someone been close behind me they would likely have rear-ended my car. They might have also assumed I brake-checked them & reacted with anger. Requested Volvo corporate involvement for 4th repair attempt & IHU was replaced. System began malfunctioning again, but blind spot worked. The Google system is apparently unstable, as the 2nd loaner car's backup camera &

cross traffic warning froze & failed to alert. Dates: 9-6-22 to 1-25-23 (date they took car for repair try #5). About 4000 miles on it. Volvo says they can't replicate concerns. I have video of some malfunctions & sent to dealer.

- NHTSA Complaint No. 11514260 (2022 Volvo XC60), March 28, 2023: The vehicle performed an over the air update which failed. The vehicle became inoperable. The vehicle was force started with dash lights indicating multiple system failures. The infotainment system has crashed multiple times rendering climate control non usable. A loaner 2023 XC60 was provided which also resulted in the infotainment center crashing twice. Dealership acknowledged the issue but has no solution for the issue. My concern is there is no guarantee the other safety features are functioning correctly if the most simple electrical component of the vehicle is failing.
- NHTSA Complaint No. 11522135 (2023 Volvo XC60), May 15, 2023: I've had my Volvo for 6 months and two weeks ago I started getting warning alerts that the braking system, lane departure system and other electrical systems were having issues (the doors wouldn't lock and car wouldn't start). I've taken the car to the Volvo dealership 3 times and they have been unsuccessful in determining what the issue is. There is something wrong with the software and a software update that was installed on my car at the first service visit (when this began happening 2 weeks ago).
- NHTSA Complaint No. 11526543 (2023 Volvo XC90), June 12, 2023: 1. When putting vehicle in reverse the backup camera has a slight delay which can cause serious accidents. I've never driven a vehicle with such delays. Needs to be checked out. 2. When putting vehicle in reverse, the backup camera comes up, ut if you press any button on the main screen the backup camera screen will go away. For example I press the AC button, the backup camera will disappear and the AC settings will come up. This causes a very dangerous situation. There isn't even a way to get back the camera view once you press anything on the screen. This happens because Volvo cars don't have much physical buttons left, so everything is controlled on the screen. In my opinion, when reversing, the backup camera should always be the dominant thing on the screen, no other functions should be able to overwrite that.
- NHTSA Complaint No. 11595667 (2023 Volvo XC40), June 21, 2023: Backup camera frequently flickers between video stream and black screen, creating a dangerous situation while backing up. Display screen also frequently displays message sharing camera is not available when shifting into reverse. After multiple

trips to Volvo dealership they state the problem is common but nothing they can do about it.

- NHTSA Complaint No. 11542948 (2023 Volvo V60), September 6, 2023: All of the sounds in the vehicle just stops. This has happened twice while driving the vehicle. No safety warning sounds, no idiot light sounds, no turn signal sound and no radio. The vehicle still runs; however all the the safety ADAS systems remain silent. There are no warning sounds for any of Volvo's advanced safety systems. This is a series safety issue since there are no sounds; someone would have to constantly watch the dashboard instead of watching the road while one is driving.
- NHTSA Complaint No. 11543044 (2023 Volvo XC90), September 6, 2023: The rearview camera on the Volvo continually freezes, is delayed to start or blacks out. Since I have had the car for the last year there have been multiple times a week where reverse is selected and the rearview camera loads, then when I start backing the camera image freezes two to three times before jumping and resuming normal operation. I've also experienced where the camera image is displayed, then the screen temporarily blacks out for a second and then the image is displayed again. This happen most notably when the car is unlocked and then immediately shifted into reverse. I've brought this into show the repair shop but they state it is normal behavior or they can't replicate the issue (even though I've provided them a video of the issue happening). After a year it's getting very dangerous as backing into tight spaces, a delay or black out can cause me to hit something or someone thinking I'm further away then I really am. When the car is in a deep sleep (not driven for a few days), then the camera can take upwards of 15+ seconds to load after turning on the car and selecting reverse.
- NHTSA Complaint No. 11544210 (2023 Volvo S60), September 13, 2023: While driving on the interstate 5 in Seattle, WA this Volvo rental car from National had the Multi-media screen went blank. No tell-tales nor instrument readings. The 360 camera and reverse camera systems worked as not part of the Android system. The infotainment system encountered a problem with an Android System with data corrupt. Had to reset factory data reset. Given this is a non-compliance to FMVSS Controls and Displays per Standard 101, I feel obligated to report this concern for driver safety around compatability of the Android system used by Volvo.
- NHTSA Complaint No. 11546426 (2023 Volvo C40), September 25, 2023: There is a software issue in this car which causes the following: 1) Rear backup camera completely turns off multiple times DURING backing up 2) A fault which presents as a "propulsion" failure, which causes the car to stop unexpectedly, start

jerk, and then limits top speed to 20 mph. I've taken the car into the dealership for evaluation and was told "there's a software issue, we don't know what date that will be released" Overall, Volvo software is incredibly feeble with multiple errors and slow performance. However, this is my first experience with a software issue that caused the car to malfunction while driving.

- NHTSA Complaint No. 11548899 (2023 Volvo XC60), October 8, 2023: I've experienced many problems with the Google built in system in this Volvo. But the one that keeps happening is the speed sensors. The car is supposed to read traffic signs, including speed signs and alarm when exceeding the posted speed limit. It does not work. For example on I66 East bound in Virginia, the speed limit is not 80mph, it is either 60, 65 or 70 if using the express lanes. The Volvo keeps showing the speed limit on this interstate as 80, see attached images showing speed limit sign at 80. Complained to Volvo, they blamed Google. Complained to Google, they blamed Volvo. Other roads have the same sign recognition. The car infotainment & safety features randomly shut down, or fail, while driving and the vehicle has to be reset often. Back up cameras quit working while backing up sometimes it will not go into reverse without shutting off the car or doing a reset.
- NHTSA Complaint No. 11549846 (2024 Volvo XC90), October 13, 2023: The contact owns a 2024 Volvo XC90. The contact stated that while reversing, the audible back over warning alarm did not activate as designed. The contact stated that the failure was intermittent. The vehicle was taken to the local dealer who was unable to duplicate the failure. The contact stated that technicians from the dealer were sent to the home and witnessed the failure but stated that the vehicle had operated as designed. The manufacturer was notified of the failure, but no assistance was offered. The VIN was not available. The failure mileage was 1,000.
- NHTSA Complaint No. 11553711 (2022 Volvo XC40), November 6, 2023: The rear backup camera consistently fails to provide a view while in reverse. The camera either blinks between a view and black screen, or will completely fail and say the camera is unavailable.
- NHTSA Complaint No. 11554722 (2023 Volvo XC60), November 12, 2023: On November 11, 2023 @ between 10:30 and noon, the vehicle infotainment system completely failed. The screen went blank and functions for heat, radio, navigation, cameras, indicator lights in the mirror and the ability to call Volvo emergency services were all lost. A message on the screen said, "Stop the vehicle. This vehicle's infotainment system has encountered a problem. You can reboot or reset factory settings. If this doesn't help, please contact a workshop." This is the

second such failure. The first occurred on September 22, 2023. I filed a report with Volvo (REF#[XXX]), and repairs were effected at a local dealer in Maryland.

- NHTSA Complaint No. 11557619 (2024 Volvo XC90), November 30, 2023: All of the electronics are malfunctioning, no navigation, possible airbag and seatbelt malfunction, warning lights on. I am concerned that all of the electronic safety systems are not working properly. Internal SOS button not working. Herb Chambers Volvo in Norwood, Ma. Service manager has confirmed that this is a problem with the 2024 XC90. The car is brand new and Herb Chambers Volvo does not have any available appointments for several weeks to address concerns. I also contacted Volvo USA and they were unable to assist. I have also requested that the area Volvo factory rep, Tom Laforte contact me and I have not heard back from him. In the meantime we are unable to drive our new Volvo due to these safety concerns.
- NHTSA Complaint No. 11558778 (2022 Volvo XC60), December 6, 2023: The contact owns a 2022 Volvo XC60. The contact stated that on several occasions while the vehicle was turned on, the radio cluster and instrument panel failed to illuminate. Additionally, the contact stated that he and his wife observed a clicking sound coming from the engine compartment when the vehicle was turned off. The vehicle was taken to a dealer however, the failure could not be duplicated. The vehicle was not repaired. The manufacturer was notified of the failure. The failure mileage was approximately 1,500.
- NHTSA Complaint No. 11586275 (2023 Volvo XC90), May 1, 2024: Multiple times when driving the car, all sounds that the car makes will simply stop working. This includes things like the safety features and warning sounds, the turn signals, the radio, any map directions, etc. We have researched online for a solution and found others with similar problems, and we have reported the issue to the dealer on 3 different occasions - they took it into service and told us they did updates to the software, but none of their changes have prevented this from happening again. It is random. Other times, the screens will simply lock up, but the audio still works. Eventually, the system will reset. Sometimes all it takes is turning the car off and back on again, other times we've had to leave it to sit overnight before it is working again. This is clearly a safety issue and also a ridiculous thing to have happen to a car that costs over \$70,000.
- NHTSA Complaint No. 11586454 (2022 Volvo XC60), May 1, 2024: What component or system failed or malfunctioned, and is it available for inspection upon request? -The backup camera system fails to respond intermittently. Often

times the screen will remain black for several seconds while backing up before the screen shows any picture. Other times it will come on, and then flash to black while you are backing up. This is a major hazard should a child run/walk behind a car, when this occurs. I'm hoping others have expressed this problem so action can be taking. How was your safety or the safety of others put at risk? -Since Backup cameras are a federal requirement since 5/2018. The Failure to function on these new cars I find to be unacceptable. Even more so given that Volvo is supposed to be a brand dedicated to safety. Has the problem been reproduced or confirmed by a dealer or independent service center? -Indirectly yes, the Volvo dealership acknowledged that the new Google system is slow to respond at times. But they said a new software update would fix it. I have found this to not be the case and it seems to be happening more frequently now. Has the vehicle or component been inspected by the manufacturer, police, insurance representatives or others? -yes by the dealer. Were there any warning lamps, messages or other symptoms of the problem prior to the failure, and when did they first appear? -no.

- NHTSA Complaint No. 11587636 (2022 Volvo S60), May 8, 2024: Main center display becomes blank at random times. Sometimes this is accompanied by a loud squealing sound from car audio. When display blanks, all HVAC functions stop including defog, also all audio including turn signal indication sound. Sometimes display and functions self recover after approximately 15-20 seconds, sometimes it does not self recover and in these cases the ignition needs to be turned off and the drivers door opened to "turn off" the vehicle systems so that they can restart. The condition is completely random. The condition has been noted by other 2022+ Volvo owners in various forums. The software in my car has been updated following a complaint for this concern, however it has occurred again since the update. Date provided in report details is most recent event.
- NHTSA Complaint No. 11592804 (2024 Volvo S60), June 4, 2024: Backup camera will fail to work, on occasion, when car put into reverse. This problem is known by Volvo and I have been told "they are working on it." Searching the Internet I see that this has been an issue since late 2022. I have brought my car to the dealer two times and the problem remains. The last time this happened was 2 days ago (did not drive the car yesterday). Please see [XXX] for more information. Thank you.
- NHTSA Complaint No. 11592932 (2022 Volvo XC90), June 6, 2024: There have been three incidents where the following happens: While driving in regular suburban driving, the entire infotainment system and cluster panel (all digital--odometer, tachometer, everything) shut off entirely (go black) and the climate system also shuts off. It goes through some reset cycle and then eventually restarts

after several seconds. Both times it has been right after pressing some button on the steering wheel that controls the infotainment or doing some operation with the infotainment system such as skipping a track or making a call. Apple Car Play has not been in use. The first time it was 4-5 months ago (2024). The second time was about 2 months ago. The third time was on June 6, 2024. This third time, while at a red light, everything went black and even the car shut off. Luckily, the car was not moving and within a couple of seconds, without touching anything or changing anything, it restarted itself and the infotainment system and cluster rebooted. I am concerned that this may eventually happen while the car is moving. Will be taken to the dealer for review/repair immediately.

- NHTSA Complaint No. 11616735 (2022 Volvo XC60), September 26, 2024: Case number 240821-000271 was opened on 8/21/24 with Volvo Car USA Support. I have three main concerns: 1) The infotainment system losing the favorites that I have saved in the Sirius application. This had been an intermittent problem that I had been having since I purchased the car. I finally took it into the service department at Volvo Cars of Gilbert on 1/7/23 for this problem (Invoice Number VOCS110975). The service department was unable to recreate the problem so they did nothing. 2) A complete car system reboot while I was driving on 6/10/24. As I was driving down the road the HVAC system shut off and the dash and infotainment system screens went blank. All car systems completely shut down except the engine. This was an extremely frightening experience as all of this happened with no warning whatsoever WHILE I WAS DRIVING. This is a huge safety issue! Within about a minute of driving like this the systems started to come back up. I proceeded home. The next morning I took the car to Volvo Cars of Gilbert again. They had the car for 5 days and performed a software update on the IHU (Infotainment Head Unit) (Invoice Number VOCS120164). 3) The failure of the infotainment system to update after starting the car and driving. This happened on 8/7/24 and I took the car directly to Volvo Cars of Gilbert again. The infotainment system was stuck on “Infotainment system starting...” for the entire 12-minute drive to Volvo. Volvo Cars of Gilbert had my car for 8 days this time and this time they did a reload to the existing IHU (Invoice Number VOCS121204). I asked that they replace the IHU. Volvo refused to replace the IHU because it was too expensive at \$3200. Also, the problem of the infotainment system losing its radio favorites has become much worse. It happens daily now. I believe there is an opportunity for a catastrophic event to happen while I am driving if this IHU problem is not corrected immediately.
- NHTSA Complaint No. 11632338 (2022 Volvo C40), December 25, 2024: Message popped up “cameras temporarily unavailable” and backup and surround

view cameras aren't working. A quick google search and it seems to be a very common software problem.

- NHTSA Complaint No. 11632319 (2022 Volvo C40), December 25, 2024: The backup camera on this model has serious reliability issues. It freezes while backing up, and frequently displays a "camera temporarily unavailable" message. Volvo attempted to improve the reliability with a software update this year, but it did very little. The fact that it displays the temporarily unavailable message reveals that Volvo clearly knows about the problem, and they think displaying this message is acceptable. The dealer service manager admits the problem is with the software, and has been discussed at length on internet forums. This car has terrible rear visibility, and a functioning backup camera is absolutely required for safe operation.
- NHTSA Complaint No. 11633554 (2025 Volvo XC90), January 1, 2025: When I try to back the car out of parking lot, it shows "Camera temporary unavailable". The problem disappears sometime. It is a new car and this has happened a couple of times already.
- NHTSA Complaint No. 11633941 (2022 Volvo XC40), January 3, 2025: Backup camera not working: Repeated get no backup camera image - just see a black screen with message "Camera unavailable" or "Camera temporarily unavailable". This happens more often than the camera works. Seems to be related to OTA software update - had no camera problems for a most of the year and then after an OTA the camera issues began.
- NHTSA Complaint No. 11634462 (2023 Volvo XC90), January 6, 2025: Constant malfunction of Infotainment center. Turn indicators do not always work. Lately braking error messages. Volvo said it needs software updates. That has been done multiple times. This time it lasted several days and was completely black. You cannot see any information. No radio, no Bluetooth, no GPS, no data on car systems. Car has had problems for almost 2 years and excuse is always the software.
- NHTSA Complaint No. 11636593 (2023 Volvo C40), January 17, 2025: There are frequent errors with the infotainment. Often times, when backing up—the screen will say “back up camera not available.” Recently, I experienced a problem where the blinkers were not working until I reset the software on the car.
- NHTSA Complaint No. 11637435 (2025 Volvo XC90), January 21, 2025: Remote start, infotainment system which controls everything, dashboard, lights, and cigarette lighter all intermittently turn off and on. Everyday, something else

seems to stop working. My vehicle is 2.5 weeks old. This is apparently is a know latent defect that Volvo has chosen to keep from customers, based on feedback from VOLVO service, who are actually denying appointments stating that there is nothing they can do.

- NHTSA Complaint No. 11640010 (2023 Volvo C40), January 31, 2025: Cameras stopped working and getting message “camera temporarily not available”. But does not appear to be temporary. Lots of discussion of this issue on message boards but nothing from Volvo.
- NHTSA Complaint No. 11640000 (2023 Volvo XC40), January 31, 2025: The rear reverse camera cuts out with a message on the driver display stating "Camera temporarily not available". This occurs ~10% of the time. Other times the camera will flicker in and out but both scenarios result in partial or complete obstruction of view while reversing. With my children and other little children on the street, this is very concerning. The issue was reported to the dealership and software was updated but the problem remains.
- NHTSA Complaint No. 11641583 (2023 Volvo XC40), February 9, 2025: When pulling out my pack up camera often say camera is not available at this time.
- NHTSA Complaint No. 11646570 (2025 Volvo XC90), March 5, 2025: On 2 occasions (only had vehicle 3 weeks), Ive received a message on the screen that the camera is temporarily unavailable when in reverse. The message suggests I press the home button but didn't help. I then rebooted the Google based system by long pressing the home button again. After the reboot, hit the same message the camera is unavailable. I then tried to select the other cameras (side mirrors, front bumper), but nothing displayed.
- NHTSA Complaint No. 11646827 (2023 Volvo XC40), March 6, 2025: Back up camera repeatedly fails. Often when put in reverse it says “camera temporarily unavailable “. Sometimes while actively backing up the camera fails. Service center says Volvo is aware but unable to fix.
- NHTSA Complaint No. 11646827 (2023 Volvo XC40), March 17, 2025: Cameras Temporarily not available when backing up from garage. This is the third time it has happened. I reset the software as instructed by the tech advisor each time. until it finally worked. Reset from EST to DST, Cameras were reset also. This is happening too often. Approximate mileage is 1000.
- NHTSA Complaint No. 11661947 (2023 Volvo XC40), March 19, 2025: The contact owns a 2023 Volvo XC40. The contact stated while reversing, the back-

over prevention camera failed to function as intended. The contact stated that the camera displayed a black screen, and the back-over prevention camera was not functioning as needed with an error message displayed. The contact stated that the vehicle was recently serviced at the dealer and the recall repair was performed under NHTSA Campaign Number: 25V282000 (Back Over Prevention); however, the failure reoccurred. The vehicle was not diagnosed or repaired by an independent mechanic or the dealer. The manufacturer was not made aware of the failure. The failure mileage was approximately 5,000.

- NHTSA Complaint No. 11652231 (2023 Volvo XC60), April 2, 2025: Reverse backup camera repeatedly does not work and will display message saying camera unavailable. Sound system will go out with the center screen were no sound comes through (not even blinker sound). With a small child and have concerns driving when these issues occur, especially since they occur unexpectedly. Issues will occur a few days in a row, then work fine for a few days and then issues will occur again. Have been to the shop where they looked at the issue and was advised have to wait for a software update.
- NHTSA Complaint No. 11661267 (2025 Volvo XC60), April 10, 2025: I am getting the message "Camera temporarily unavailable" which means I can't backup safely.
- NHTSA Complaint No. 11659870 (2024 Volvo XC60), May 2, 2025: I was backing up out of my driveway and the camera was not available, nor did the sensor work while I was backing up. I hit a parked car as a result of this, resulting in damage to the back of my car. This has happened before, but never resulted in an accident until this time.
- NHTSA Complaint No. 11661267 (2024 Volvo XC60), May 15, 2025: The infotainment center in this vehicle controls multiple features including HVAC, mapping, etc. Mine reboots 3-10 times per day. This causes windows to fog, console and speed to go blank along with many other important features. I've had it in the shop multiple times and finally they told me that Volvo won't replace under warranty unless it fully crashes. This isn't living up to their written warranty and is a safety hazard.
- NHTSA Complaint No. 11661552 (2022 Volvo XC40), May 16, 2025: When I tried to back up my car, the backup camera on the screen keeps displaying temporarily unavailable warning on the screen. This happens 5 out of 10 times...
- NHTSA Complaint No. 11662127 (2023 Volvo S90), May 20, 2025: Backup camera problem is more prevalent after recall software update when backing up,

or when trying to view the rear camera manually, the message says "Camera Temporarily Unavailable" for the entire duration I was driving for 40 minutes.

- NHTSA Complaint No. 11663690 (2023 Volvo XC40), May 25, 2025: Going back to last year I have reported to Volvo the software issues on the car. 1. Automatic Emergency Braking - Currently the car is ABRUPTLY breaking in the streets thinking it there is a car in front. It's so incredibly dangerous. I've reported it and they have not done anything about it. (Most Recent Issues) 2. Electrical - the screen every other week needs to be reset - it reads that it does not have air-conditioning, airbags, and all the buttons are grayed out. I've reported this since December of last year. NOTHING HAS BEEN DONE 3.
- NHTSA Complaint No. 11663945 (2021 Volvo XC40), May 30, 2025: After having the rear camera software update to address the safety recall on 05/28, the "camera unavailable" problem persists. This vehicle has underpowered chipset in the IHU and the entire IHU should be subject to recall.
- NHTSA Complaint No. 11664155 (2023 Volvo XC90), June 1, 2025: Rear view camera sometimes does not display on the infotainment screen even though the car is in Reverse. The display message is "Camera is temporarily unavailable". I have yet to receive a recall notice. This issues makes backing up very dangerous!
- NHTSA Complaint No. 11664927 (2022 Volvo XC40), June 4, 2025: Hi, I have a 2022 Volvo XC40 Recharge (Full Electric) I and EVERYONE else has had issues with the back-up camera flickering and going out completely and giving a "Camera Not Available" message on the screen in the car. Volvo has said a few times they have a fix for this issue. And the latest vehicle OS update 3 5.24 which I had installed at the dealer last week said they fixed the issue. They have NOT. I am still getting the message and no camera. This is not an isolated issue. I am member of a Volvo XC40 recharge forum and this issue is on all cars. It's a software issue. Its very dangerous to start backing up with the camera on and then all of a sudden it goes out. Thank you.
- NHTSA Complaint No. 11665042 (2025 Volvo XC60), June 5, 2025: Camera intermittently stops working with "Camera temporarily unavailable" message. This last a day or two and then it "fixes itself". This is a safety issue that MUST be fixed, Volvo has known about this for years and has done nothing to fix it.
- NHTSA Complaint No. 11665222 (2022 Volvo S60), June 6, 2025: I reported this issue last year when my car was just barely outside of the extended service plan agreement we had on the car. I had called the dealership with similar issues as well way before hand. My infotainment system which controls all and I mean all

of the safety features I paid/am still paying for no longer works. It's a known issue with Volvo they know and so do other mechanics. Prior to this my instrument panel completely blanked out:went black for a minute while driving. Thankfully the car never shut off but I called them they said see if it happens again and that was that. I only really have my blindspot indicators working everything else doesn't. With that I lost access to my back up camera, and proximity sensors.

- NHTSA Complaint No. 11666908 (2024 Volvo XC40), June 14, 2025: The Infotainment system in this automobile freezes frequently denying access to critical auto controls such as, one pedal EV driving, air conditioning/heating controls and many other controls. I have received a message that the, "Camera is Unavailable" and the screen goes dark. The dealer has attempted to reload the software and update the software multiple times all without any remedy.
- NHTSA Complaint No. 11667647 (2023 Volvo XC60), June 18, 2025: For more than a year, we have experienced issues with the infotainment system. Despite many trips to the dealership it has not been fixed. The infotainment system randomly shuts down and or reboots, which seems to affect other systems like turn signals, climate control, lane departure alerts, etc.
- NHTSA Complaint No. 11668530 (2024 Volvo S60), June 23, 2025: The rear back-up camera does not work. This occurs at least a few times a week with routine, daily driving. The vehicle starts normal and software loads normal; however, upon shifting to reverse, the camera is not displayed. Instead, I receive an error message stating that the camera is not available. My vehicle already has the recall for updated software that was intended to fix the camera issue (software version 3.5.24); however, the issue is worse with this software version. On previous versions, this issue occurred only a couple times a month. It not happens weekly.
- NHTSA Complaint No. 11668705 (2023 Volvo XC90), June 23, 2025: To Whom It May Concern, I am filing a complaint against Volvo Car USA for unresolved defects in my 2023 Volvo XC90 T8 Recharge, purchased in Indiana. The vehicle's control systems—infotainment, climate control, navigation, backup camera, and reverse braking—are defective, impairing its use, value, and safety, despite maintenance and updates. Study and searches on owner forums and social media discovered that those issues are widespread among the 2023 model year of Volvo XC-90 T8. Issues: Backup camera often shows "unavailable" when reversing, posing safety risks. -Volvo did a software recall in May, 2025. The issue seemed largely resolved. Automatic reverse braking (ARB) falsely triggers,

causing abrupt stops. No permanent adjustment exists. -The issue persists even after multiple software updates including the recall mentioned above. The false ARB activations made drivers and passengers traumatized and panicked for "hitting or being hit by other vehicles or objects. Infotainment and climate control system lags (5+ minutes to respond), displays errors, and is unreliable. That became a bigger problem during inclement weather that driver and passengers may suffer injury from the extreme cold or hot conditions for a long period of time. This is even more dangerous when there are elderlies, pregnant women, or children in the vehicle. This issue was not resolved even after multiple software updates. Further research indicated the issue was not only from software but also from hardware (including but not limited to the CPU chips, RAM, etc. LTE connection is unstable 50% of the time, affecting navigation or emergency assistance. Volvo uses safety and emergency assistance as one of the selling points for its vehicles. However, the instability of its LTE connection makes the "SOS call" unreliable or not functional when customers are in danger. Even after multiple visits of Volvo dealer and contact of Volvo customer care, there is no solution.

- NHTSA Complaint No. 11669472 (2025 Volvo XC60), June 25, 2025: On 6/24/25 warning given that rear camera — actually all cameras — were unavailable. Cameras remained unavailable for several hours, when they “magically” came back on. 6/24/25 — radio sound disappeared. Only returned after a hard reset of the center infotainment system. 6/25/25 — another warning that cameras were unavailable, but as quickly as it flashed on, it went off, and cameras were available. 6/25/25 — entire infotainment center and air handling/ac system went black while i was driving. Center re-set itself while i was driving. Warning light that cameras were unavailable also flashed on then off. 6/25/25 — Vehicle, which was only purchased on 6/18/25, was picked up by dealer for investigation. 6/26/25 — Told that problems are known by Volvo, apparently related to a software update instituted after a 3/25 recall for same problem, and that multiple vehicles are reporting same and continued issue. Software updated is “promised” but date undetermined.
- NHTSA Complaint No. 11669265 (2024 Volvo XC90), June 25, 2025: While in Reverse and in progress of backing out of a parking space, the live video feed of the rear-view camera froze. I did not realize the screen on the dashboard had frozen until I had already backed up several feet. Once I realized the video feed was a frozen, I stepped on the brake. This frozen video feed caused me to briefly back out of my parking spot blind and unaware if the area behind the car was safe. This was the second occurrence of this happening, after already having received a software update several weeks ago at the local Volvo dealership for a different

recall notice to address the rear-view camera screen displaying "Camera Not Available" when in Reverse.

- NHTSA Complaint No. 11670052 (2024 Volvo C40), June 29, 2025: There are 2 very serious safety issues that are extremely dangerous with this car. #1 - The Automatic Intervention Rear Brake Auto Brake engages for no reason when there is nothing behind the car. It happens when I am backing up very slowly. It throws me forward and then thrusts me back into the headrest. This has happened 3 times in 2 months. #2- At least two times a week the Information Panel turns off while driving for no reason and goes blank. I can't see the speedometer, blinkers don't work, lane assist doesn't work, and the map disappears. I have pull off the road and reset it to continue driving. We have taken the car to Premier Volvo dealership 2 times and have spoken to the Asst. Service Manager and the General Sales Manager. The Asst Service Mgr. explained these are well known safety issues. He explained #1 is a problem with no solution and #2 is a Google problem waiting for new software. The General Sales Manager agreed that #1 is an issue, but didn't offer a solution. He also said #2 is a Google software problem with this car, they are waiting for a software update. Also, the sales rep and Service Manager verified these issues are well known problems. These were not disclosed to us when we leased the car.
- NHTSA Complaint No. 11670489 (2021 Volvo XC40), July 1, 2025: The contact owns a 2021 Volvo XC40. The contact stated that while reversing, the back over prevention screen image malfunctioned and started flickering before displaying a blank screen. During the failure, the message "Camera Unavailable" was displayed. The cause of the failure was not yet determined. The manufacturer and local dealer were notified of the failure. The contact was informed that the vehicle was recently repaired under NHTSA Campaign Number: 25V282000 (BACK OVER PREVENTION). The contact stated that the vehicle had experienced the failure listed in the recall. The failure mileage was 36,000.
- NHTSA Complaint No. 11671010 (2024 Volvo S60), July 3, 2025: URGENT SAFETY CONCERN: Intermittent Total Loss of All Vehicle Audio Alerts This issue has occurred multiple times and poses a serious safety concern. While driving, the vehicle intermittently experiences a complete loss of all audio output. This includes: •Turn signal indicators •Hazard warning sounds •Blind spot monitoring alerts •Park distance control tones •Navigation guidance •Audio system playback (music, radio, etc.) •All other safety-related audio warnings and notifications The vehicle becomes completely silent, eliminating essential auditory cues that are critical for safe operation. Temporary Workaround (While Driving): The only way to restore functionality is by performing a forced reboot

of the infotainment system. This requires the driver to press and hold the home button until the system power cycles—a distracting and unsafe action that must be done while the vehicle is in motion. Please note that while rebooting does not disable the vehicle's ability to drive, it temporarily resets multiple core systems, including the climate control and infotainment interface. This creates a significant distraction and impairs the driver's ability to safely monitor vehicle status and surroundings. This malfunction poses a significant safety risk and must be investigated immediately.

- NHTSA Complaint No. 11671009 (2024 Volvo XC90), July 3, 2025: URGENT SAFETY CONCERN: Intermittent Total Loss of All Vehicle Audio Alerts This issue has occurred multiple times and poses a serious safety concern. While driving, the vehicle intermittently experiences a complete loss of all audio output. This includes: •Turn signal indicators •Hazard warning sounds •Blind spot monitoring alerts •Park distance control tones •Navigation guidance •Audio system playback (music, radio, etc.) •All other safety-related audio warnings and notifications The vehicle becomes completely silent, eliminating essential auditory cues that are critical for safe operation. Temporary Workaround (While Driving): The only way to restore functionality is by performing a forced reboot of the infotainment system. This requires the driver to press and hold the home button until the system power cycles—a distracting and unsafe action that must be done while the vehicle is in motion. Please note that while rebooting does not disable the vehicle's ability to drive, it temporarily resets multiple core systems, including the climate control and infotainment interface. This creates a significant distraction and impairs the driver's ability to safely monitor vehicle status and surroundings. This malfunction poses a significant safety risk and must be investigated immediately.
- NHTSA Complaint No. 11671576 (2022 Volvo XC40), July 7, 2025: On 7/5 car's cameras (all of them) went off again when and Camera Not Available message displayed on console. We had already gotten the NHTSA required software upgrade on 7/2 that was to correct this problem. Once the vehicle was turned off - and started again -- the cameras worked. But it's anyone's guess how long that will last. I called the dealership and they reported that "about two other vehicles" that had the recall and had their software upgraded also came back in with the same complaint. There's no remedy yet from Volvo. Just wanted you to know their "fix" in response to you is not really a "fix."
- NHTSA Complaint No. 11672883 (2022 Volvo XC40), July 11, 2025: The contact owns a 2022 Volvo XC40. The contact stated while attempting to reverse the vehicle, the rearview camera not available message was displayed. The

vehicle was repaired under NHTSA Campaign Number: 25V282000 (BACK OVER PREVENTION); by the previous owner however, the repair failed to repair the vehicle. The contact stated that the failure had occurred on several occasions. The manufacturer was notified of the failure, and informed the contact that a supervisor would reach out. The failure mileage was 24,480.

- NHTSA Complaint No. 11673016 (2023 Volvo XC90), July 12, 2025: I purchased this vehicle new in October of 2023. From Day 1 I have had issues where the backup camera would display an image and then turn off while backing up. I brought the car in multiple times for this before the recall was issued and then again when the recall was issued. The recall work has been completed and oddly the issue went away for a few days and then returned. I have since brought it back in and they performed a full software restore at the dealer. The problem with the camera has not been rectified. I added to the complaint emergency braking because this car also has a habit of emergency braking when pulling into or out of parking spaces with no obstacles near. This issue, hasn't really been investigated much as it is much more intermittent and difficult to duplicate.
- NHTSA Complaint No. 11673233 (2024 Volvo S60), July 14, 2025: Vehicle will randomly lose all audio. A safety issue since audio from turn signals is mute.
- NHTSA Complaint No. 11673470 (2023 Volvo XC90), July 14, 2025: **\*\*CURRENT RECAL FIX DID NOT FIX MY ISSUE\*\*** Often when starting vehicle after hours of parking and entering reverse to back out of parking spot, camera will show "camera temporarily unavailable" and is not usable for a time (30seconds up to several minutes). We have software version 3.5.24 in-which the recall should have already been fixed as per the letter we received. The issue is not resolved and persists.
- NHTSA Complaint No. 11674057 (2022 Volvo XC60), July 16, 2025: Manufacturer Recall NumberR10320 NHTSA Recall Number25V282 the recall for "Camera is Temporarily Not Available" was preformed at dealer on Monday 7/14/2025 today the same message appear on the display screen when I went to backup in a parking lot. Software version shows it as unto date in settings 3.7.##.
- NHTSA Complaint No. 11674204 (2025 Volvo XC60), July 17, 2025: I am writing to formally express my significant concerns and dissatisfaction with the recurring software and system issues I have experienced with my Volvo XC60, purchased on 1st February 2025, approximately four months ago. The vehicle's Vehicle Identification Number (VIN) is [XXX] . Since taking delivery, I have encountered multiple persistent problems that have severely impacted the

vehicle's functionality and my overall driving experience. These issues include:

Car Sensors: The sensors frequently malfunction, leading to inconvenience and raising serious safety concerns. Heads-Up Display: The display intermittently shuts off, limiting access to critical driving information. Cruise Control: This feature is entirely non-functional, significantly detracting from the driving experience. Sound System: Following a recent service visit, the audio system has completely stopped working, with no sound from the music system, indicators, or system alerts. Check Engine Light: The malfunction indicator lamp (MIL) repeatedly illuminates, suggesting potential issues with the engine or related systems, likely triggered by sensor malfunctions. This persistent warning heightens my concerns about the vehicle's safety and reliability. Despite multiple visits to your service center—exceeding ten occasions—these issues remain unresolved. The service team has typically reset error messages or updated the software, only for the problems to reoccur shortly thereafter. Most recently, the sound system failure emerged post-service, further compounding my frustration with this brand-new vehicle.

- NHTSA Complaint No. 11675536 (2023 Volvo XC40), July 23, 2025: My name is [XXX] , and I am writing to escalate a critical and ongoing safety issue following a recent recall-related software update on my Volvo vehicle (VIN: [XXX] ). The recall was intended to resolve a defect involving the rear camera becoming unavailable. However, ever since the update—starting approximately two weeks ago—my car has begun to experience the very issue the recall was meant to fix. The rear camera frequently becomes non-functional, especially while reversing, creating a major safety risk. The latest incident occurred today, [XXX], and I have multiple video recordings clearly documenting the failure over the past two weeks. This malfunction has resulted in accident-prone situations, endangering my safety and that of others.
- NHTSA Complaint No. 11675656 (2024 Volvo XC90), July 23, 2025: The contact owns a 2024 Volvo XC90. The contact stated that while the vehicle was parked, the rear-view camera became inoperable. The contact stated the rearview image was blank. The contact received notification of NHTSA Campaign Number: 25V282000 (Back Over Prevention); however, the part to do the recall repair was not yet available. The contact stated that several local dealers were contacted and confirmed that the contact would be added to a waitlist to have the recall repair performed. The contact stated that the manufacturer had exceeded a reasonable amount of time for the recall repair. The manufacturer was made aware of the failure. The approximate failure mileage was 5,500. Parts distribution disconnect.

- NHTSA Complaint No. 11676303 (2022 Volvo XC40), July 25, 2025: Backing in to garage got camera not available, happens intermittently, cause is due to inherently underpowered CPU for head unit Volvo installed, it was out of date at time of manufacture, they have announced a new cpu for 2025/26 model year vehicles. Vehicle is on latest software that was supposed to address this issue.
- NHTSA Complaint No. 11677999 (2025 Volvo XC60), July 28, 2025: Backup camera failed while backing up. 07/28/2025 Screen went black. Other computer controlled functions also failed concurrently, e.g, climate control, audio warnings, map display Screen blackout has happened several times while driving, but backup camera failure while car was backing up was worse.
- NHTSA Complaint No. 11677135 (2022 Volvo XC40), July 30, 2025: Car has had a previous software recall done at a Volvo dealership to address issues with the back-up camera, but even after the recall, the camera display is still frequently malfunctioning. When in Reverse, the back-up camera display often freezes for several seconds at a time while the car is in motion. This is very dangerous since anything moving behind the car (such as a small child or animal) is completely invisible until the display unfreezes. At least once a week the camera will fail to work entirely and just display a text error on screen: Camera is Temporarily Unavailable. This generally goes away on its own, but often takes putting the car into Park and back into Reverse. Occasionally, resetting the head unit is required to clear the problem.
- NHTSA Complaint No. 11677143 (2023 Volvo C40), July 30, 2025: After having our car repaired per NHTSA recall 25V-282 we are still having issues with malfunctions of the backup camera system including warning messages that the camera is unavailable during attempts to drive in reverse.
- NHTSA Complaint No. 11677554 (2025 Volvo XC60), July 31, 2025: My vehicle is affected by the recall #R10320 or NHTSA # 25V282. The recall letter states that the dealerships have the updated software available to solve the back-up camera issue, also over the air update will solve the problem later if that is my choice. The problem is that I see this as just a marketing ploy to get me into the dealership and upsell me on something I don't want. The OTA update should be available at the same time the dealership has the software. This is not an acceptable situation. This issue has always been very annoying and inconvenient and continues to be so. I just don't want the inconvenience of going to the dealership where there should be an alternative.

- NHTSA Complaint No. 11677665 (2024 Volvo XC90), July 31, 2025: Several times a month the infotainment system on my car completely freezes. When this happens, my blinkers do not work, my CarPlay does not work, I cannot use voice commands, I cannot play the radio or answer calls, the backup and parking sensors do not make an audible sound. The only way to fix this is to hold down the home button to restart the entire system which does take a few minutes so not ideal to do while driving. Turning the car off and back on does not even fix it. This is an extreme safety issue, as when this happens I am driving without the use of blinkers until my system finishes restarting. Not only am I unable to use blinkers, but I am unable to make calls over Bluetooth or CarPlay which is incredibly dangerous in the event of an emergency. I am unable to park or backup and be able to hear the beep of the sensors. I cannot hear the audio of my gps. It happens out of the blue and is so unsafe.
- NHTSA Complaint No. 11677917 (2025 Volvo XC60), August 1, 2025: After recall took my car for repair to the volvo dealer. They installed the new software version 3.7 but it did not fix the problem...still i am getting backup camera not available message.
- NHTSA Complaint No. 11677889 (2025 Volvo XC60), August 1, 2025: I was getting the "Rear Camera Not Available" warning, starting months ago. I received the notification of the Volvo recall R10320. I scheduled a software inspection/upgrade at the dealer. On July 8, the dealer installed the newer software that supposed to take care of it. Revision 3.6.4 was installed. It seemed okay for a week. Now the same warning message comes up about 25% of the time. Perhaps an even newer version may have fixed the issue? I made another appointment to check on it. But the dealer cannot see the car for another week.
- NHTSA Complaint No. 11678532 (2023 Volvo C40), August 5, 2025: Re. R10320 Volvo sent a recall notice regarding the rearview camera being unavailable when vehicle is placed in reverse. This is an issue that affects me/my car almost daily. The notice is dated June 27, 2025 and was told an Over The Air update would be available. I do not live nearby a Volvo dealer so rely on the ability to update the software remotely. However the OTA option is not recognized by my vehicle. When I called Volvo they told me there is no date by which the OTA update will be available and advised me to visit a dealer. Please encourage Volvo to make this important update available via OTA. Thank you.
- NHTSA Complaint No. 11679507 (2025 Volvo XC90), August 9, 2025: The screens and backup camera are repeatedly crashing, even after the recall "fix" from the dealership. This happens multiple times a week.

- NHTSA Complaint No. 11681370 (2025 Volvo XC60), August 18, 2025: The backup camera doesn't always work. There are times when you will put the car in reverse and it will attempt to display the backup camera but instead says camera is temporarily unavailable. There recently was a recall for this, twice, but the issue continues to occur.
- NHTSA Complaint No. 11681234 (2023 Volvo XC40), August 18, 2025: When the vehicle was put into reverse, the rear view camera failed to be displayed on the screen.
- NHTSA Complaint No. 11681683 (2023 Volvo XC40), August 19, 2025: The rear-view camera is cutting out and/or unresponsive. Upon going into reverse, the rear-view camera occasionally cuts out to a blank screen. In a recent instance, I was in reverse and was completely unable to get the rear-view camera to operate whatsoever. When this occurs it is impossible to see what is directly behind the car. My car was just at the dealership yesterday (8/18/25) and has the current version of the software (v 3.7) installed.
- NHTSA Complaint No. 11592333 (2024 Volvo V90), August 19, 2025: Volvo updated their infotainment computer system and it is not functioning properly. A "hard reset" is required to make it work; included in the issues is heat and air; seat activation and entertainment functions. They do not have a date in which issues will be resolved. My vehicle has been to the dealer 2x for repairs and yesterday I was informed they don't know when it will be fixed. SAFETY issues is trying to adjust and or correct system while driving; air conditioning etc.
- NHTSA Complaint No. 11681497 (2024 Volvo V90), August 19, 2025: Infotainment/Car Software upgraded to 3.7 and have not LOST the PIP 360 camera in reverse. 360 camera appears black and only left with rear camera.
- NHTSA Complaint No. 11682052 (2023 Volvo XC60), August 21, 2025: We've owned a couple of the XC60s from the new generation. We have had many conversations with Volvo and the dealership but they have yet to rectify the issue. What it all boils down to, is that Volvo put an underperforming center console in its new generation of cars (2016-2025). The console does not have enough memory to process everything it's doing. As a result it locks up and either freezes or shuts off. The problem is the console operates everything in the car. When it fails everything goes dark including the dash. The safety features turn off and you are essentially driving blind. We have had this issue on so many of our cars: 2018 XC60 which was replaced with a 2019 XC90 to avoid lemon law. The 2019 xc90 had the issues. We have been leasing and are stuck in this cycle because Volvo

refuses to address the hardware issue. Instead we are forced to either drive a car with a dead brain or trade in for another Volvo. Volvo keeps thinking it can solve the issue with software updates but that's not true. They need to do a RAM upgrade for these cars. We know we are not the only ones with these issues and the advice of "just reboot" or "don't use the apps" or "don't use the crash mitigation features" does not work. We specifically picked Volvo for safety but enough is enough. Our car is undriveable and from our sample size alone 6 out of 6 new generation cars have had this issue. The console shutting down sometimes takes out the virtual cockpit too. Meaning no speed is displayed, the car may try to mitigate crashes erratically, the heating and cooling will also not function. To put it plainly, the car turns into a flying brick. I feel very fortunate that this has not caused a crash yet.

- NHTSA Complaint No. 11682943 (2025 Volvo XC60), August 25, 2025: The 360 camera system stopped working on my 2025 Volvo XC60 PHEV today without warning. When I put the vehicle in reverse, the camera view window showed up on the screen with a top down of the vehicle, but the surroundings were black and each camera symbol showed up as orange with a cross out through it. Rebooting the system twice did not solve the issue. The software version is 3.7.0 which is the most up to date release.
- NHTSA Complaint No. 11685240 (2022 Volvo S60), September 5, 2025: I received a previous recall notice for the backup camera not working and visited the dealership on August 19, 2025 to receive the software update that was supposed to fix this problem. Since receiving the fix, I have continued to have the same intermittent interruption of the backup camera as I was having before the "fix". I do not believe the software fix helped the issue and this feels like an underpowered hardware issue.
- NHTSA Complaint No. 11662127 (2024 Volvo S90), September 7, 2025: The car just received the latest Volvo over air software update - v3.7. The car has twice had the driver's display screen lose its ability to display the map between the speedometer and the tach (map image pixelates and display goes white) and then the entire display goes blank. When this failure mode is active, I have had to use Google maps or Waze on my cellphone to determine my actual speed. The driver's display screen does eventually reboot.
- NHTSA Complaint No. 11685554 (2023 Volvo XC90), September 10, 2025: Backup camera stopped working during reverse event. Recall did not fix the issue.

- NHTSA Complaint No. 11687349 (2024 Volvo XC90), September 15, 2025: Some critical functions on the center display console instrument panel are freezing up while driving - we are unable to change the drive mode while the car is in motion. This has not happened before, and it is glitching a lot lately. The display has been extremely slow and unresponsive, and the problem is multiplied as all critical functions of the car are controlled through the display panel. There were no warnings issued when we tried to change the drive mode. We had to pull over to the roadside, turn off the car for 30 seconds, then restart the car to fix the issue. We have [XXX] and [XXX] ) in the car, so this is becoming increasingly risky to drive this "safe" car by Volvo. We have reported such issues with the display to our Volvo service unit multiple times, and the car has been returned to us with such issues still lingering (despite the service reloading/updating the software multiple times) for the last 6 months since March of this year.
- NHTSA Complaint No. 11687828 (2025 Volvo XC60), September 17, 2025: The contact owns a 2025 Volvo XC60. The contact stated that while driving at an undisclosed speed, the instrument cluster displayed a blank screen. The vehicle was taken to the dealer, where it was diagnosed with an inoperable instrument cluster. The contact was informed that the instrument cluster needed to be replaced. The vehicle was not repaired. The dealer performed a software reboot; however, the failure reoccurred. In addition, the contact was informed that the instrument cluster failure was a known failure; however, there was no fix. The contact stated that the failure was a major concern while using the GPS. The contact stated that the failure was persistent. In addition, the contact stated that the failure had occurred while the contact and his wife were driving the vehicle. The contact stated that when the failure occurred, within several minutes, the instrument cluster independently reset. The manufacturer was made aware of the failure but provided no assistance. The failure mileage was approximately 3,000.
- NHTSA Complaint No. 11688785 (2023 Volvo XC40), September 22, 2025: backup camera continues to say 'camera temporarily unavailable' even after software update from recall. latest software update has made the problem worse. Camera frequently fails when backing up.
- NHTSA Complaint No. 11690759 (2023 Volvo XC90), October 1, 2025: There was always an issue with the car software. On several occasions while driving the entire screen will black out. I would need to pull over immediately so that the screen can be reset manually. Other times the screen is on, but there is no sound, such as my signal lights when switched to left or right will not have any sound, just blinking. Other times, when I back up the car, the cameras will blackout making it impossible to know if there are cars approaching or any pedestrians

behind the car. This has happened on multiple occasions since I took the car on Oct 15 2023. These issues were brought to the attention of the Volvo dealership where the car is leased, but the problem was never fixed.

- NHTSA Complaint No. 11691939 (2023 Volvo XC90), October 7, 2025: My 2023 Volvo xc90 was recalled for issues with the backup camera. Software update was installed twice without success. Finally camera was replaced. No success either.
- NHTSA Complaint No. 11693063 (2023 Volvo XC40), October 13, 2025: I am writing to provide an update on an existing recall, 25V282, for the rear-view camera image failing to display during the start of each reversing event. This issue was meant to be resolved via a software update, which my car received and installed. However, this did not solve the issue. I still receive the "Camera Temporarily Unavailable" message regularly when shifting my car into reverse, and I am unable to see the rearview camera image.
- NHTSA Complaint No. 11694979 (2023 Volvo XC60), October 22, 2025: There has been at least 5 incidences where the audio stopped working for the turn signals, navigation stopped, radio stopped and air conditioning stopped. The first 2-3 times the system reset itself. The 4th incident I was driving in torrential rain, the wiper auto sensor stopped and every warning light on the dashboard lit up. As the rain dissipated, the system seemed to clear itself. Today, on my way to the dealership, the turn signal audio stopped, navigation stopped, radio stopped. The service advisor verified the situation. His response, per Volvo instructions, tell the customer to reset the system once a month. There's no written instructions to resolve the problem. The service advisor admitted this is an ongoing problem and corporate is making no attempt to resolve it. Is Volvo waiting for a life threatening situation before addressing the problem. I can't rely upon the computer system to function properly. Volvo has a responsibility to its car owners for supposedly being one of the safest cars on the road. This vehicle is becoming unreliable. Thank you.
- NHTSA Complaint No. 11698407 (2025 Volvo EX30), November 9, 2025: I've owned the EX30 for approximately 3 months. During that time, there have been approx. 5 incidents where after backing the car from a parking spot and switching to drive mode, the entire navigation screen goes blank and the screen displays the car as being in reverse mode. After being advised by Red Bank Volvo, NJ that this likely would be rectified during a major software update, I installed 2 major updates without a resolution to this problem - shortly after the 2nd update, I experienced the issue again. On 11/7/25 I brought the car to service and was told

there were no error codes and software was up-to-date so they could do nothing. I called Volvo Customer Service to report the issue, and they advised bringing the car back to service, where a remote diagnostic assessment could be performed with corporate service. I was not advised by Red Bank Volvo that this was an option.

- NHTSA Complaint No. 11681358 (2025 Volvo XC40), November 14, 2025: 360 degree Camera not available. 360 Degree Camera is malfunctioning sporadically. It will completely disappear and a message on the infotainment display will not “Camera Temporarily Unavailable. We have reset the unit as per manufacture specification and it doesn’t solve the issue. We can sometime lock the doors, leave it overnight and it will set-reset and grin the camera back on line. This has now napped twice in the space of 500 miles from new. There are multiple owners report regarding this defect. Volvo has not heat solved the issue from happening thru software or hardware updates.
- NHTSA Complaint No. 11701707 (2024 Volvo S60), November 26, 2025: When my son got a car last December, we bought him a 2024 Volvo s60, primarily for the safety features. Since we have had the vehicle, Volvo has had a lot of issues with their infotainment system. He has contacted them many times and I had started to keep a record of how often it would glitch. If it was just music not working, no big deal. But sometimes it was the backup camera too and once the heat. He recently had a car accident. He is okay (of course shaken up) but it was a bad situation. A van had dropped a lot of items. Plumbing and metal shelving. There was a pick up who was trying to avoid it. My son tried to avoid the pick up unsuccessfully but partially because his wheels landed on metal shelving and he was sliding on the road. The accident report captured this. His car was totaled. The purpose of this email is that the car was totaled, as even though he was braking as hard as he could, his tire was sliding on that shelving so he did have quite a hard impact. Not one safety feature worked on this vehicle, not the SOS, not the forward, not the airbags. My intuition is telling me it's all related to these many issues with the electronics in this car (recharge models have had this issue and been recalled). Before they dispose of the vehicle I wanted to consult with an attorney to see if we have any recourse with Volvo, especially because safety is why we bought the car. It is currently at the body shop. The infotainment has had an issue forever.
- NHTSA Complaint No. 11702368 (2022 Volvo C40), December 1, 2025: The rear camera has never worked properly. When I put the car in reverse, sometimes it doesn’t show an image. This happens most days. This has been over a minute in duration, though sometimes shorter. This has happened hundreds of times. It also

sometimes will display a still image when moving, which of course is very dangerous as it gives a sense of safety and being clear when anything could move into the rear area without me knowing. I have done the recall, which was an ineffective software update. I am on software 3.7, which has the latest, and it didn't work. Volvo offers no fix other than to reset the computer over and over. This doesn't fix it. It is a hardware issue in which the computer isn't capable of running all its functions. The only fix is hardware, and Volvo will need to be forced to do that. Many people complain of this issue. It is rampant in all the online communities.

- NHTSA Complaint No. 11703383 (2025 Volvo XC60), December 4, 2025: Even after the last recall campaign, my vehicle still frequently fails to activate the backup camera with a message stating Backup Camera unavailable. The software update that was intended to resolve the issue has not worked. I've seen multiple other Volvo drivers complaining about the same issue online. This is regarding the following previous recall: Recall R10320 WAM Upgrade, Model Year 2021-2025 S60, V60, V60CC, S90, V90, V90CC, XC60, XC90, XC40, EX40, C40 and EC40 vehicles The supposed fix was provided in software version 3.5.14, and my vehicle is currently on 3.7.0.
- NHTSA Complaint No. 11703608 (2022 Volvo C40), December 8, 2025: On multiple occasions, the vehicle's infotainment system has malfunctioned, and when this occurs, the turn signals stop working entirely. This failure has happened while the vehicle was in active use, including during a long trip, leaving us without functioning turn signals for an extended period. This creates a serious and immediate safety hazard for both the occupants of the vehicle and other drivers. After seeking advice, we were instructed to reboot the infotainment system. Once rebooted, the turn signals began working again. However, several weeks later, the same failure occurred again while driving. The turn signals stopped functioning without warning, forcing us to pull over and restart the infotainment system in order to restore basic signaling functionality. This issue appears to be recurring and directly affects a critical safety system of the vehicle.

111. Although Volvo were aware of the widespread nature of the Infotainment Defect in the Class Vehicles, and that it posed grave safety risks, Volvo have failed to take adequate steps to notify all Class Vehicle owners of the Defect and provide relief.

112. Customers have reported the Infotainment Defect in the Class Vehicles to Volvo directly and through its dealers. Volvo is fully aware of the Infotainment Defect contained in the

Class Vehicles. Moreover, Volvo had the ability to notify Class Vehicle owners about the Infotainment Defect directly and via its authorized dealerships at the time of sale and thereafter. Nevertheless, Volvo actively concealed the existence and nature of the Defect from Plaintiff and the other Class Members at the time of purchase or repair and thereafter. Specifically, Volvo:

- a. failed to disclose, at the time of purchase or repair and thereafter, any and all known material defects or material nonconformities of the Class Vehicles, including the Infotainment Defect;
- b. failed to disclose, at the time of purchase or repair and thereafter, that the Class Vehicles and their AAOS-based infotainment systems were not in good working order, were defective, and were not fit for their intended purpose; and,
- c. failed to disclose and/or actively concealed the fact that the Class Vehicles and their AAOS-based infotainment systems were defective, despite the fact that Volvo learned of the Infotainment Defect as early as 2021.

113. Volvo have deprived Class Members of the benefit of their bargain, and exposed them all to a dangerous safety Defect.

114. Volvo have not recalled the Class Vehicles to repair the Infotainment Defect, have not issued any bulletins or instructions to its dealerships regarding the Infotainment Defect, have not offered to its customers a suitable repair or software replacement related to the Infotainment Defect free of charge, and have not reimbursed all Class Vehicle owners and leaseholders who incurred costs for repairs related to the Infotainment Defect.

115. Class Members have not received the value for which they bargained when they purchased or leased the Class Vehicles.

116. As a result of the Infotainment Defect, the value of the Class Vehicles were worth less money at the time of sale.

117. Reasonable consumers, like Plaintiff, expect and assume that a vehicle's infotainment system and rear-view camera is not defective and will not freeze or fail to function under normal driving conditions. Plaintiff and Class Members further expect and assume that Volvo will not sell or lease vehicles with known safety defects, such as the Infotainment Defect, and will fully disclose any such defect to consumers prior to purchase or offer a suitable non-defective repair. They do not expect that Volvo would fail to disclose the Infotainment Defect to them, and then fail to remedy the defect under Volvo's warranty.

### **CLASS ACTION ALLEGATIONS**

#### **A. The Class**

118. Pursuant to Fed. R. Civ. P. 23(a), 23(b)(2), 23(b)(3), and/or 23(c)(5), Plaintiff seeks to represent the following class:

**Pennsylvania Class:** All persons or entities who purchased or leased any 2021 to 2025 Volvo XC40, 2022 to 2025 Volvo C40, 2022 to 2025 Volvo XC60, 2022 to 2025 Volvo XC90, 2022 to 2025 Volvo S60, 2022 to 2025 Volvo S90, 2022 to 2025 Volvo V60, 2022 to 2025 Volvo V90, 2025 Volvo EX30, 2025 Volvo EX40, and 2025 Volvo EX90 vehicles in the Commonwealth of Pennsylvania (the "Pennsylvania Class")

119. Defendants and their employees or agents are excluded from the Class.

#### **B. Numerosity**

120. Upon information and belief, the Class is so numerous that joinder of all members is impracticable. While the exact number and identities of individual members of the Class are unknown at this time, such information being in the sole possession of Defendants and obtainable by Plaintiff only through the discovery process, Plaintiff believes, and on that basis

alleges, that thousands of Class Vehicles have been sold and leased nationwide and throughout Pennsylvania.

**C. Common Questions of Law and Fact**

121. There are questions of law and fact common to the Class that predominate over any questions affecting only individual Class members. These questions include:

- a. whether the Class Vehicles suffer from the Infotainment Defect;
- b. whether the Infotainment Defect constitutes an unreasonable safety hazard;
- c. whether Defendants know about the Infotainment Defect and, if so, how long Defendants have known of the Defect;
- d. whether the defective nature of the Class Vehicles' infotainment systems constitutes a material defect;
- e. whether Defendants had and have a duty to disclose the defective nature of the Class Vehicles' infotainment systems to Plaintiff and the other Class Members;
- f. whether Plaintiff and the other Class Members are entitled to equitable relief, including, but not limited to, a preliminary and/or permanent injunction;
- g. whether Defendants knew or reasonably should have known of the Infotainment Defect contained in the Class Vehicles before they sold or leased them to Class Members; and
- h. Whether Defendants breached the express warranty and the implied warranty of merchantability, engaged in fraudulent concealment and unjust enrichment, and whether Defendants violated the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. § 201-1, *et seq.*

**D. Typicality**

122. The Plaintiff's claims are typical of the claims of the Class since Plaintiff purchased or leased defective Class Vehicle, as did each member of the Class. Furthermore, Plaintiff and all members of the Class sustained economic injuries arising out of Defendants' wrongful conduct. Plaintiff is advancing the same claims and legal theories on behalf of herself and all absent Class members.

**E. Protecting the Interests of the Class Members**

123. Plaintiff will fairly and adequately protect the interests of the Class and has retained counsel experienced in handling class actions and claims involving unlawful business practices. Neither Plaintiff nor her counsel has any interest which might cause them not to vigorously pursue this action.

**F. Proceeding Via Class Action is Superior and Advisable**

124. A class action is the superior method for the fair and efficient adjudication of this controversy. The injury suffered by each individual Class member is relatively small in comparison to the burden and expense of individual prosecution of the complex and extensive litigation necessitated by Defendants' conduct. It would be virtually impossible for members of the Class individually to redress effectively the wrongs done to them. Even if the members of the Class could afford such individual litigation, the court system could not. Individualized litigation presents a potential for inconsistent or contradictory judgments. Individualized litigation increases the delay and expense to all parties, and to the court system, presented by the complex legal and factual issues of the case. By contrast, the class action device presents far fewer management difficulties, and provides the benefits of single adjudication, an economy of scale, and comprehensive supervision by a single court. Upon information and belief, members

of the Class can be readily identified and notified based on, *inter alia*, Defendants' vehicle identification numbers, warranty claims, registration records, and database of complaints.

125. Defendants have acted, and refused to act, on grounds generally applicable to the Class, thereby making appropriate final equitable relief with respect to the Class as a whole.

**FIRST CAUSE OF ACTION**  
**Fraudulent Concealment**  
**(On behalf of Plaintiff and the Class)**

126. Plaintiff incorporates by reference all allegations contained in this Complaint as though fully stated herein.

127. By affirmatively misrepresenting the Class Vehicles as reliable and safe, and by failing to disclose and concealing the defective nature of the Class Vehicles' infotainment system from Plaintiff and Class Members, Volvo concealed and suppressed material facts concerning the performance and quality of the Class Vehicles.

128. Defendants knew that the Class Vehicles' AAOS-based infotainment system suffered from an inherent defect, were defectively manufactured or made, would fail prematurely, and were not suitable for their intended use.

129. Defendants were under a duty to Plaintiff and the Class Members to disclose the defective nature of the Class Vehicles' AAOS-based infotainment system and/or the associated repair costs because:

- a. Defendants were in a superior position to know the true state of facts about the safety defect contained in the Class Vehicles' AAOS-based infotainment system;
- b. Defendants knew that the Class Vehicles suffered from an inherent defect, were defectively manufactured, and were not suitable for their intended use;

- c. Plaintiff and the Class Members could not reasonably have been expected to learn or discover that their AAOS-based infotainment systems have a dangerous safety defect until after they purchased the Class Vehicles; and,
- d. Defendants knew that Plaintiff and the Class Members could not reasonably have been expected to learn about or discover the Infotainment Defect.

130. On information and belief, Volvo still have not made full and adequate disclosures and continue to defraud consumers by concealing material information regarding the Infotainment Defect and the performance and quality of Class Vehicles.

131. The facts concealed or not disclosed by Defendants to Plaintiff and Class Members are material in that a reasonable person would have considered them to be important in deciding whether or not to purchase the Class Vehicles.

132. Plaintiff and Class Members relied on Defendants to disclose material information they knew, such as the defective nature of the AAOS-based infotainment systems in the Class Vehicles, and not to induce them into a transaction they would not have entered had the Defendants disclosed this information.

133. By failing to disclose the Infotainment Defect, Defendants knowingly and intentionally concealed material facts and breached their duty not to do so.

134. The facts concealed or not disclosed by Defendants to Plaintiff and the other Class Members are material because a reasonable consumer would have considered them to be important in deciding whether or not to purchase the Class Vehicles, or to pay less for them.

135. Had Plaintiff and other Class Members known that the Class Vehicles suffer from the Infotainment Defect, they would not have purchased the Class Vehicles or would have paid less for them.

136. Plaintiff and the other Class Members are reasonable consumers who do not expect that their vehicles will suffer from a Infotainment Defect. That is the reasonable and objective consumer expectation for vehicles.

137. As a result of Defendants' misconduct, Plaintiff and the other Class Members have been harmed and have suffered actual and economic damages in that the Class Vehicles are defective and require repairs or replacement parts and are worth less money because of the Defect.

138. Accordingly, Defendants are liable to Plaintiff and Class Members for damages in an amount to be proven at trial.

139. Volvo's actions and omissions were done maliciously, oppressively, deliberately, with intent to defraud, and in reckless disregard of Plaintiff's and the Class's rights and well-being, to enrich Volvo. Volvo's conduct warrants an assessment of punitive damages in an amount sufficient to deter such conduct in the future, which amount is to be determined according to proof.

140. Furthermore, as the intended and expected result of their fraud and conscious wrongdoing, Volvo have profited and benefited from Plaintiff's and Class Members' purchase of Class Vehicles containing the Infotainment Defect. Volvo has voluntarily accepted and retained these profits and benefits with full knowledge and awareness that, as a result of Volvo's misconduct alleged herein, Plaintiff and Class Members were not receiving vehicles of the quality, nature, fitness, or value that had been represented by Volvo, and that a reasonable consumer would expect.

141. Volvo have been unjustly enriched by their fraudulent, deceptive, and otherwise unlawful conduct in connection with the sale and lease of Class Vehicles and by withholding

benefits from Plaintiff and Class Members at the expense of these parties. Equity and good conscience militate against permitting Volvo to retain these profits and benefits, and Volvo should be required to make restitution of their ill-gotten gains resulting from the conduct alleged herein.

142. Plaintiff seeks damages and injunctive and equitable relief for herself and for the Class.

**SECOND CAUSE OF ACTION**  
**Unjust Enrichment**  
**(On behalf of Plaintiff and the Class)**

143. Plaintiff incorporates by reference all allegations contained in this Complaint as though fully stated herein.

144. Defendants have long known about the Infotainment Defect which they concealed and failed to disclose to Plaintiff and Class Members.

145. As a result of their fraudulent acts and omissions related to the Infotainment Defect, Volvo obtained monies which rightfully belong to Plaintiff and the Class Members to the detriment of Plaintiff and Class Members.

146. Volvo appreciated, accepted, and retained the non-gratuitous benefits conferred by Plaintiff and the proposed Class Members who, without knowledge of the Infotainment Defect, paid a higher price for their vehicles which actually had lower values. Volvo also received monies for vehicles that Plaintiff and the Class Members would not have otherwise purchased or leased.

147. It would be inequitable and unjust for Volvo to retain these wrongfully obtained profits.

148. Volvo's retention of these wrongfully obtained profits would violate the fundamental principles of justice, equity, and good conscience.

149. As a result of Defendants' unjust enrichment, Plaintiff and Class Members have suffered damages.

150. Plaintiff does not seek restitution under their Unjust Enrichment claim. Rather, Plaintiff and Class Members seek non-restitutionary disgorgement of the financial profits that Defendants obtained as a result of their unjust conduct.

151. Additionally, Plaintiff seeks injunctive relief to compel Defendants to offer, under warranty, remediation solutions that Defendants identify. Plaintiff also seeks injunctive relief enjoining Defendants from further deceptive distribution, sales, and lease practices with respect to Class Vehicles, enjoining Defendants from selling the Class Vehicles with misleading information concerning the Infotainment Defect; compelling Defendants to provide Class members with adequate repairs or with replacement software or components that do not contain the defects alleged herein; and/or compelling Defendants to reform their warranty, in a manner deemed to be appropriate by the Court, to cover the injury alleged and to notify all Class Members that such warranty has been reformed. Money damages are not an adequate remedy for the above requested non-monetary injunctive relief.

**THIRD CAUSE OF ACTION**  
**Breach of Implied Warranty of Merchantability**  
**pursuant to 13 Pa. C.S. § 2A212**  
**(On behalf of Plaintiff and the Class)**

152. Plaintiff incorporates by reference all allegations contained in this Complaint as though fully stated herein.

153. Defendants are merchants with respect to motor vehicles.

154. The Class Vehicles were subject to implied warranties of merchantability running from the Defendants to Plaintiff and to Class Members.

155. An implied warranty that the Class Vehicles were merchantable arose by operation of law as part of the sale or lease of the Class Vehicles.

156. Defendants breached the implied warranty of merchantability in that the Class Vehicles suffer from the Infotainment Defect referenced herein and thus were not in merchantable condition when Plaintiff and Class Members purchased or leased the Class Vehicles, or at any time thereafter, and the Class Vehicles are unfit for the ordinary purposes for which such vehicles were purchased or leased to be used. Specifically, the Class Vehicles suffer from a defective AAOS-based infotainment system that freezes, crashes, or becomes unresponsive, causing the loss of critical vehicle displays and safety functions – including the federally mandated rear-view camera and other driver-assistance features – thereby impairing the driver’s ability to safely operate the vehicle and rendering the Class Vehicles unsafe and unlawful to operate.

157. As a result of Defendants’ breach of the applicable implied warranties, owners and lessees of the Class Vehicles suffered an ascertainable loss of money, property, and/or value of their Class Vehicles. Defendants’ actions, as complained of herein, breached the implied warranty that the Class Vehicles were of merchantable quality and fit for such use.

**FOURTH CAUSE OF ACTION**  
**Breach of Express Warranty pursuant to 13 Pa. C.S. § 2A210**  
**(On behalf of Plaintiff and the Class)**

158. Plaintiff incorporates by reference all allegations contained in this Complaint as though fully stated herein.

159. In connection with the sale or lease of the Class Vehicles, Defendants provided Plaintiff and Class Members with their New Vehicle Limited Warranty where Volvo promised to repair defective parts within 48 months or 50,000 miles in service, whichever comes first.

160. Plaintiff and Class Members relied on Defendants' warranty when they agreed to purchase or lease the Class Vehicles, and Defendants' warranty was part of the basis of the bargain.

161. Plaintiff and Class Members submitted their vehicles for warranty repairs as referenced herein. Defendants failed to comply with the terms of the express written warranty provided to each Class Member, by failing to repair the Infotainment Defect under the vehicle's warranty within a reasonable period of time as described herein.

162. Plaintiff and Class Members have given Defendants reasonable opportunity to cure said defect, but Defendants have been unable and/or have refused to do so within a reasonable time.

163. As a result of said nonconformities, Plaintiff and Class Members cannot reasonably rely on the Class Vehicles for the ordinary purpose of safe, reliable, comfortable, and efficient transportation.

164. Plaintiff and Class Members could not reasonably have discovered said nonconformities with the Class Vehicles prior to Plaintiff and Class Members' acceptance of the Class Vehicles.

165. Plaintiff and Class Members would not have purchased or leased the Class Vehicles, or would have paid less for the Class Vehicles, had they known, prior to their respective time of purchase or lease, that Class Vehicles contained the Infotainment Defect.

166. As a direct and proximate result of the willful failure of Defendants to comply with their obligations under the express warranty, Plaintiff and Class Members have suffered actual and consequential damages. Such damages include, but are not limited to, the loss of the use and enjoyment of their vehicles, and a diminution in the value of the vehicles containing the defects identified herein.

**FIFTH CAUSE OF ACTION**  
**Violations of the Pennsylvania Unfair Trade Practices and Consumer Protection Law,**  
**73 P.S. § 201-1, *et seq.***  
**(On behalf of Plaintiff and the Class)**

167. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

168. Plaintiff and each Class Member is a “person” as defined by 73 P.S. § 201-2(2).

169. Each Defendant is a “person” as defined by 73 P.S. § 201-2(2).

170. Plaintiff’s and each Class Members’ purchase and/or servicing of the Class Vehicles is a “Trade” or “Commerce” as defined by 73 P.S. § 201-2(3).

171. The Defendants are in the business of selling motor vehicles and therefore are bound by 73 P.S. § 201-1, *et seq.*, which prohibits engaging in unfair or deceptive acts in the conduct of any commerce or trade.

172. The sale of the Class Vehicles under the guise that they were free from defects that would substantially impair their use, safety, or value violates the public policy of the Commonwealth of Pennsylvania and is an unlawful or deceptive trade practice under 73 P.S. § 201-1, *et seq.*

173. The Defendants further violated 73 P.S. § 201-1, *et seq.*, in one or more of the following ways:

- a) Defendants were in a superior position to know the true state of facts about the Infotainment Defect contained in the Class Vehicles;
- b) Plaintiff and Class Members could not reasonably have been expected to learn or discover that their vehicles have a dangerous safety defect until after they purchased or leased the Class Vehicles; and,
- c) Defendants knew that Plaintiff and Class Members could not reasonably have been expected to learn about or discover the Infotainment Defect.

174. The facts concealed or not disclosed by Defendants to Plaintiff and Class Members are material in that a reasonable person would have considered them to be important in deciding whether or not to purchase the Class Vehicles.

175. Plaintiff and Class Members relied on Defendants to disclose material information they knew, such as the Infotainment Defect in the Class Vehicles, and not to induce them into a transaction they would not have entered had the Defendants disclosed this information.

176. Defendants' failure to disclose this information was misleading in a material respect because a reasonable consumer would have been misled by Defendants' conduct.

177. Defendants' deceptive acts and practices were consumer-oriented because they had a broad range impact on consumers at large, affecting all owners and lessees of Class Vehicles.

178. By failing to disclose the Infotainment Defect, Defendants knowingly and intentionally concealed material facts and breached their duty not to do so.

179. Moreover, Defendants' intentional concealment of and failure to disclose the Infotainment Defect constitutes an unfair and deceptive act and practice because, to the detriment of Plaintiff and Class Members, that conduct took advantage of Plaintiff and Class Members'

lack of knowledge, ability, and experience to a grossly unfair degree. Defendants' unfair and deceptive trade practices were a producing cause of the economic damages sustained by Plaintiff and Class Members.

180. The facts concealed or not disclosed by Defendants to Plaintiff and Class Members are material because a reasonable consumer would have considered them to be important in deciding whether or not to purchase the Class Vehicles, or to pay less for them.

181. Had Plaintiff and Class Members known that the Class Vehicles would suffer from the Infotainment Defect, they would not have purchased the Class Vehicles or would have paid substantially less for them.

182. Plaintiff and Class Members are reasonable consumers who do not expect that their vehicles will suffer from the Infotainment Defect. That is the reasonable and objective consumer expectation for vehicles.

183. As a result of Defendants' misconduct, Plaintiff and Class Members have been harmed and have suffered actual and economic damages in that the Class Vehicles are defective and require repairs or replacement and are worth less money because of the Defect.

184. Defendants' deceptive acts and practices were willful and knowing because Defendants knew that the AAOS-based infotainment systems contained in the Class Vehicles were defective before they began selling Class Vehicles and chose not to disclose the problem to consumers.

185. Defendants violated the law willfully and knowingly.

186. Defendants' failure to comply with these provisions constitutes an unfair or deceptive act under 73 P.S. § 201-1, *et seq.*, and, as such, the Plaintiff and Class Members are entitled to double or treble damages plus reasonable attorney's fees.

**DEMAND FOR RELIEF**

WHEREFORE, Plaintiff, on behalf of herself and all others similarly situated, prays for judgment against Defendants as follows:

- a. An order certifying the proposed Class, designating Plaintiff as named representative of the Class, and designating the undersigned as Class Counsel;
- b. An order awarding Plaintiff and Class Members their actual damages, incidental and consequential damages, punitive damages, and/or other form of monetary relief provided by law;
- c. An order awarding Plaintiff and the Class restitution, disgorgement, or other equitable relief as the Court deems proper;
- d. Equitable relief including, but not limited to, replacement of the Class Vehicles with new vehicles, or repair of the defective Class Vehicles with an extension of the express warranties and service contracts which are or were applicable to the Class Vehicles;
- e. A declaration requiring Defendants to comply with the various provisions of the state and federal consumer protection statutes herein alleged and to make all the required disclosures;
- f. Reasonable attorneys' fees and costs;
- g. Pre-judgment and post-judgment interest, as provided by law;
- h. Plaintiff demands that Defendants perform a recall, and repair all Class Vehicles; and
- i. Such other and further relief as this Court deems just and proper.

**TRIAL BY JURY DEMANDED ON ALL COUNTS**

Dated: December 23, 2025

LYDIA LEONBERG, *ON BEHALF OF HERSELF  
AND ALL OTHERS SIMILARLY SITUATED*,

By /s/ Sergei Lemberg  
Sergei Lemberg, Esq.  
LEMBERG LAW, LLC  
43 Danbury Road  
Wilton, CT 06897  
Phone: (203) 653-2250  
Fax: (203) 653-3424  
*Attorneys for Plaintiff*

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Lydia Leonberg, on behalf of herself and all others similarly situated

(b) County of Residence of First Listed Plaintiff State of Pennsylvania  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, Email and Telephone Number)  
Sergei Lemberg, Lemberg Law LLC,  
43 Danbury Rd Wilton, CT 06897  
(203)-653-2250

DEFENDANTS

VOLVO CARS OF NORTH AMERICA, LLC, VOLVO CAR USA, LLC

County of Residence of First Listed Defendant County of Bergen  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. § 1332(d)

Brief description of cause:  
Class Action Fairness Act of 2005

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$  
5,000,000.00

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

12/23/2025

SIGNATURE OF ATTORNEY OF RECORD

/s/ Sergei Lemberg

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

# INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

**(b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

**(c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.

Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.

**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

AO 440 (Rev. 12/09) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

District of New Jersey

Lydia Leonberg, on behalf of herself and all  
others similarly situated,

\_\_\_\_\_  
*Plaintiff*

VOLVO CARS OF NORTH AMERICA,  
LLC, VOLVO CAR USA, LLC

\_\_\_\_\_  
*Defendant*

)  
)  
)  
)  
)  
)  
)

Civil Action No.

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

Volvo Cars of North America, LLC  
1800 Volvo Place  
Mahwah, New Jersey 07430

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Sergei Lemberg, Esq.  
Lemberg Law LLC  
43 Danbury Rd  
Wilton, CT 06897

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

AO 440 (Rev. 12/09) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

District of New Jersey

Lydia Leonberg, on behalf of herself and all  
others similarly situated,

\_\_\_\_\_  
*Plaintiff*

VOLVO CARS OF NORTH AMERICA,  
LLC, VOLVO CAR USA, LLC

\_\_\_\_\_  
*Defendant*

)  
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Civil Action No.

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

Volvo Car USA, LLC  
1800 Volvo Place  
Mahwah, New Jersey 07430

A lawsuit has been filed against you.

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Sergei Lemberg, Esq.  
Lemberg Law LLC  
43 Danbury Rd  
Wilton, CT 06897

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

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☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_  
 \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: