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Service Negligence Analysis for 2020 Jaguar F-Type (VIN ...LCK67497)

Executive Summary

Between October 2024 and August 2025, a 2020 Jaguar F-Type (VIN ending **LCK67497**) experienced **recurring electrical malfunctions and cooling system failures**. Despite multiple visits to two authorized Jaguar dealerships (Jaguar Land Rover Los Angeles and Jaguar Land Rover South Bay), the vehicle's issues persisted or reoccurred. Our investigation reveals a **pattern of service negligence**: dealership technicians failed to follow Jaguar's own technical directives and service bulletins that were in effect for the known faults. Key examples include:

- **Electrical System Negligence:** An ongoing driver-side door electrical short (blowing a fuse and disabling the window/locks) was "fixed" in October 2024 with only a fuse replacement at first. The issue recurred within days, indicating an incomplete repair [1] [2]. A subsequent visit uncovered a wiring harness short to ground that should have been identified earlier [3]. Additionally, a failing battery (low-voltage warnings) was initially overlooked as "good" by the first dealer, only to outright fail and require replacement shortly thereafter [4]. Jaguar had published guidance on diagnosing battery drains and proper testing procedures, which the service centers **did not adequately follow** (see *Jaguar Technical Communications* below).

- **Cooling System Negligence:** The F-Type's cooling system suffered two similar failures within 9 months. In November 2024 a **leaking expansion tank bleed hose** (Part #T2R47919) was replaced under customer pay [5]. By August 2025, the **low coolant warning** returned; an independent specialist discovered that the same hose had failed again and, critically, that the **variable coolant pump** was malfunctioning [6] [7]. Jaguar **knew of these issues** – the manufacturer had issued a **Service Action H291** requiring a software update to prevent coolant pump faults (DTCs *P2B61-73* and *P26CB-72*), and a Technical Bulletin to replace the pump if those codes appeared [8] [9]. Neither dealership performed these actions. Instead, they addressed only the symptoms (refilling coolant or replacing hoses) and missed the root cause, allowing the problem to repeat. The replacement hose installed in 2024 had to be **replaced again in 2025**, and was even refunded under parts warranty due to its premature failure [10]. This demonstrates the earlier repair was **incomplete and did not heed Jaguar's official repair guidance**.

In sum, the evidence – spanning dealership service records, diagnostic scans, and Jaguar's own technical literature – shows that **Jaguar Land Rover Los Angeles and South Bay ignored or improperly applied multiple manufacturer directives**. These directives were readily available to them as authorized service centers (via Jaguar's TOPIx system and technical bulletins), yet critical campaigns (like *H291* for the cooling system and *H299* for engine timing components) were not executed. The result was **systemic negligence** under both warranty and post-warranty conditions, leading to repeated failures, safety risks (cooling system & electrical network faults), and the eventual need for independent repair. The following report provides a detailed chronology of the faults and repairs, cross-references each issue with Jaguar's technical

communications, and highlights the discrepancies between what **should** have been done per Jaguar's instructions and what **was** (or was not) done by the dealerships.

Summary of Key Vehicle Faults (2024–2025)

From late 2024 through August 2025, the F-Type exhibited a series of significant faults, confirmed by both dealership service records and a comprehensive diagnostic scan (33 DTCs across 18 modules) on August 27, 2025 [11]. The **most critical, recurring faults** included:

- **Gateway Module Failure – DTC B1412-96 (Permanent):** An internal fault in the Gateway Module (GWM) indicating the *"Quiescent relay box – component internal fault."* This is the vehicle's central network hub. It was flagged as the **"most critical fault"** in the August 2025 scan, as a bad GWM can disrupt communications on the CAN/LIN networks and cause unpredictable behavior [12] [13]. This fault suggests the vehicle suffered chronic electrical/network issues (potentially stemming from battery drain or wiring faults) that were never addressed by the dealers.

- **Driver Door Wiring Short – Blown Fuse & Inoperative Controls:** On multiple occasions, the left (driver) door module lost power, rendering the window and locks inoperative. The cause was a **short-to-ground in the wiring harness** leading to the door. Initially it presented as a blown fuse in the rear junction box (fuse RF08) [1]. This short recurred even after fuse replacement, ultimately tracing to a chafed wiring connector under the left engine junction box that was grounding out [3]. The short caused repeated fuse blows and likely contributed to voltage instability vehicle-wide.

- **Battery Failure – Low Voltage DTC U3003-16:** Coinciding with the wiring short, a *"low battery warning"* appeared on the instrument cluster in October 2024. The Gear Shift Module stored U3003-16 (battery voltage low) during that period [14]. The battery ultimately **failed testing** and was replaced under warranty at ~23,278 miles [4]. This indicates the vehicle experienced significant battery stress, either from the persistent short or other parasitic drains. (Notably, Jaguar issued guidance about battery management in such scenarios – see SSM 66717 under *Technical Communications* – to ensure accurate battery diagnosis [15].)

- **Engine Cooling System Leaks & DTCs (P2B61-73, P26CB-72):** The car twice exhibited **"Low Coolant" warnings**, each time due to a leak in the coolant expansion tank circuit:

- In **Nov 2024 (23,963 miles)**: A pressure test found the *"bleed pipe from expansion tank [was] leaking coolant."* The dealership replaced the expansion tank bleed hose (Jaguar Part T2R47919) and refilled coolant [5].

- In **Aug 2025 (28,769–28,812 miles)**: The low coolant warning reoccurred. This time, a diagnostic scan revealed historical engine DTCs **P2B61-73** and **P26CB-72**, indicating the **coolant flow control valve was stuck closed** and the **variable coolant pump was stuck off** [16]. In other words, the electronically controlled water pump system had malfunctioned, likely causing overheating or high pressure in the cooling circuit. Indeed, the same expansion tank hose (T2R47919) was found leaking again [10]. These fault codes were **directly linked to a known Jaguar issue** with the Ingenium 2.0L's variable coolant pump and its internal diversion shroud (discussed later).

- **Engine VVT (Variable Valve Timing) Performance Issues:** While not resulting in a check-engine light during this period, the August 2025 scan's Mode 6 on-board monitor data showed a failed test for the **VVT Monitor Bank 1**. This corresponds to potential camshaft timing problems. Jaguar had identified a widespread defect in the 2.0L Ingenium engine's camshaft timing solenoids, which could trigger DTCs like P0011, P0014, P000A/B, P054A and cause drivability issues [17] [18]. Jaguar's remedy (Service Action **H299**) was to proactively replace both VCT solenoids on affected 2018–2020 models [19]. There is **no record** that H299 or the related Technical Bulletin (JLRTB02023) was ever performed on this vehicle, despite it falling within the affected range. The unresolved VVT monitor failure in the diagnostics suggests this preventative fix was likely missed.

In summary, the vehicle's **key faults** consisted of a **systemic electrical/network failure** (GWM/internal short causing multi-module errors and battery drain) and a **recurrent engine cooling system failure** (repeated coolant leaks tied to a faulty pump/valve). Each of these fault categories had been **anticipated by Jaguar corporate** in the form of service bulletins or campaigns – which, had they been applied, could have mitigated or prevented the ongoing issues. We now turn to the detailed chronology of how these problems unfolded at the dealerships.

Timeline of Dealership Visits and Repairs (Oct 2024 – Aug 2025)

October 2024 – Recurring Driver-Side Electrical Failures

Visit 1 – JLR South Bay (Oct 2, 2024, 23,072 miles): The owner reported that the *driver's window would not roll up*. The Jaguar South Bay technician confirmed the entire driver door switch panel (window, seat, locks) was non-functional [20]. They discovered a **blown fuse** in the rear junction box for the left door module and evidence of a **short to ground** in the circuit [21] [22]. The technician replaced the fuse and *"repaired the ground wire,"* restoring function (no charge to the customer) [23]. **However, no deeper investigation** (such as tracing the harness for chafed insulation) was documented. The vehicle was returned with the root cause apparently unresolved.

Visit 2 – JLR Los Angeles (Oct 7–14, 2024, 23,278 miles): Within days, the electrical issue reoccurred – now **all driver's side door electronics were inoperative again**, and a *"Low Battery"* warning light had appeared on the dash [24] [4]. At Jaguar Los Angeles, technicians immediately found **fuse RF08 blown again**. Simply replacing it made the systems work only briefly until the fuse blew once more almost *"a millisecond"* later [1]. This prompted a **deep investigation**: they traced the wiring from the front left door, through connectors under the hood, to the rear fuse box. The culprit was pinpointed as a **shorted connector (C1BB01A-16) at the left engine junction box grounding out on the chassis** [3]. In other words, a section of the harness was rubbing on metal under the driver's footwell/engine bay, causing a direct short. The team performed a harness repair to insulate/secure the wiring, after which *"the driver door electronics [were] now working correctly."* [25] [3]

During this same visit, the dealer addressed the battery issue: The car's main battery had *failed multiple tests*. The Los Angeles tech noted DTC **U3003-16** (battery voltage low) in the Gear Shift Module, consistent with a recent low-voltage event [26] [14]. They attempted to charge the battery, but it continued to fail both in-vehicle and out-of-vehicle diagnostic tests. Ultimately, they **replaced the battery** (Part #T2H33020) under warranty and **reset the Battery Monitoring System (BMS)** [27] [4]. This cleared the low battery warning. It is worth noting that Jaguar's standard procedure after battery replacement is exactly what was done – BMS reset with the approved diagnostic tool – as emphasized in Jaguar SSM 66717 [28] [29]. The new battery

resolved the immediate voltage issue, but the **underlying cause of the drain** (the harness short, and potentially other parasitic draws) needed the above wiring repair to truly fix.

Negligence observations: The necessity of a second visit so soon indicates that Jaguar South Bay's initial repair was **incomplete or insufficient**. They replaced a fuse and nominally "repaired a ground wire," but the fault re-manifested almost immediately [1]. A thorough diagnostic per Jaguar guidelines should have involved finding **why** the fuse blew (fuses generally blow from excess current due to a short). Indeed, Jaguar had prior technical guidance on tracing unintended battery drains and shorts – for example, a Special Service Message SSM 74570 existed (for F-Types) instructing technicians to isolate circuits (such as the audio unit fuse) if persistent quiescent drains occur [30]. There is no evidence South Bay performed any parasitic draw test or consulted broader network fault possibilities; they missed the chafed harness issue that Los Angeles later caught. This led to **duplicative work** and a week of continued inconvenience/downtime for the owner. In a legal context, the first dealer's failure to identify the short could be seen as a lack of due diligence, given that the wiring fault was ultimately found in a known junction connector under the floor – a location a trained Jaguar technician might have inspected on the first go, especially with the same fuse blowing repeatedly.

November 2024 – Cooling System Failure (Expansion Tank Hose Leak)

Visit 3 – JLR Los Angeles (Nov 18–21, 2024, 23,963 miles): Approximately one month later, the vehicle presented with a **"Low Coolant Warning"** on the dash and was brought back to Jaguar Los Angeles [31]. (Notably, the car's 4-year factory warranty had expired 10 days prior on Nov 8, 2024 [32], so this repair was customer-pay.) The technician performed a pressure test of the cooling system and quickly identified a leak: the **"bleed pipe from [the] expansion tank [was] leaking coolant."** [33] This *bleed pipe* is a small diameter coolant hose that routes excess coolant/air from the expansion tank; it had cracked or come loose, causing coolant loss. The shop **removed and replaced the leaking expansion tank bleed hose** (part #T2R47919) with a new one and refilled the system with coolant (Vacuum-filled) [5]. After the repair, they test-drove the car and confirmed no further leaks at that time [5]. The owner paid $294.62 for this repair [34].

This appeared to resolve the coolant issue *temporarily*. However, the replacement of a failed coolant hose **did not address any potential root cause** for why the hose started leaking in a 4-year-old car with ~24k miles. No investigation into cooling system pressure, thermostat operation, or pump function was noted on the invoice beyond fixing the obvious leak. This omission is critical in hindsight: unknown to the dealer, **faults were likely already present in the engine management memory related to the variable coolant pump** (see next event). At the time, without an active "Check Engine" light, the dealer may not have scanned the PCM for history codes. Had they done so, they might have seen early signs of pump or valve malfunction (e.g. a pending P26CB or P2B61 code) correlating with this leak. Jaguar had, by 2024, issued specific technical bulletins about the **Ingenium 2.0L's coolant pump failures causing leaks or fan overrun** – unfortunately, there is no indication JLR Los Angeles cross-checked for these bulletins or applied the prescribed fixes during this visit.

August 2025 – Recurring Coolant Loss & Escalation to Pump Failure

Visit 4 – JLR Los Angeles (Aug 20, 2025, 28,769 miles): After roughly 5,000 more miles, the **low coolant warning light returned** in August 2025. The owner brought the F-Type back to Jaguar Los Angeles, also noting a brake pad wear warning this time [35]. The dealer performed a basic inspection and confirmed the coolant level was low again. They pressurized the system to 15 PSI and found yet another leak – now

coming from a **hose between the coolant reservoir and the top radiator hose** (essentially, again the expansion tank hose assembly) [36]. In essence, the **same area that was repaired in 2024 was leaking anew**, suggesting either the hose failed again or an adjacent connection did. The dealership, perhaps cautious of the now out-of-warranty status and the extensive nature of needed repairs, did not immediately fix the car. They provided an **estimate** for the coolant hose replacement and other maintenance (brakes, filters, etc.). Notably, the dealer's *coolant hose replacement quote was $681.64* (plus tax) as part of a larger $5,300 recommended package [37]. The owner declined to proceed at that dealer and instead sought a second opinion/cheaper solution. At this point, **Jaguar LA did not mention any deeper cause** – they treated it as a straightforward hose leak again, with no indication of checking the coolant pump or scanning for related fault codes.

Visit 5 – Independent Specialist (West Adams Radiator, Aug 25–26, 2025, 28,812 miles): The vehicle was next taken to an independent Jaguar specialist for definitive repair. Crucially, **a comprehensive diagnostic scan was run on August 27, 2025**, immediately after the cooling issue reoccurred, to get to the root cause [38]. This scan uncovered what the dealerships had missed: **engine fault codes directly tied to the coolant pump system**. The Powertrain Control Module (PCM) showed historical DTC **P2B61-73** ("Engine coolant flow control valve stuck closed") and **P26CB-72** ("Variable coolant pump performance/stuck off – actuator stuck open") [16]. In plain terms, the **primary water pump assembly was failing to operate as commanded**, and a flow-control valve (which directs coolant through different circuits) was jammed. These faults explained the pattern of repeated hose failures: if the pump's internal diversion shroud was stuck, the engine's cooling system could over-pressurize or overheat localized components, causing hoses to weaken or leak [39] [40]. It also aligned with another symptom the dealer noted: **the radiator fan running at high speed continuously**, a known side-effect when this pump fault occurs [41] (the car's computer runs the fan excessively to compensate for poor coolant circulation).

Armed with this diagnosis, the independent shop proceeded to fix not just the symptom but the cause. They **replaced the leaking expansion tank hose (T2R47919) again**, and also removed and replaced the **variable coolant pump assembly** (Jaguar calls it the "supercharger water pump" on this model, Part #JDE41599) [42] [43]. After installing the new pump and hose and refilling coolant, the cooling system was finally operating correctly. The owner supplied the parts (purchased directly from JLR Los Angeles on Aug 26), paying the independent shop only for labor ($681.16) [44]. Tellingly, the **expansion tank hose that Jaguar LA had sold** the customer was later returned to the dealer for a refund as a "**warranty swap**" [10]. This indicates that *the hose replaced in Nov 2024 was still under Jaguar's 12-month parts warranty when it failed again*, and Jaguar refunded its cost. In effect, Jaguar's part warranty covered the hose, but **no one covered the labor or inconvenience for the owner's second failure**, a direct consequence of the initial incomplete fix.

Negligence observations: The handling of the cooling system issue by Jaguar Land Rover Los Angeles reveals **serious oversights**. First, Jaguar had **explicit knowledge of a design problem** with the 2019–2020 F-Type's 2.0L cooling pump: a Service Action (**H291**) was issued to update the engine software to prevent exactly this scenario (stuck pump shroud causing high fan speeds and potential coolant system stress) [8]. All 2019–2021 F-Types from VIN K60505 onward (which includes this vehicle) were **supposed to get that PCM update** [45]. There is no record that H291 was performed at pre-delivery or any subsequent service – **indicating the dealerships likely overlooked an open recall/service campaign** on the car. Secondly, Jaguar had also published **Technical Bulletin JLRTB02030** (March 2020) instructing dealers that if a customer complains of loud engine fan noise and the codes **P2B61-73/P26CB-72 are stored**, the **variable coolant pump should be replaced** due to an internal fault (a failed diversion shroud) [46] [47]. This bulletin

applied to 2020 F-Types in the VIN range covering this car [48]. The dealer in 2024/2025 seemingly did not connect the recurring "low coolant" complaint (and likely fan overrun symptom) with this known issue – they neither checked for those DTCs nor replaced the pump. By ignoring the **manufacturer's documented repair guidance**, Jaguar LA left the root cause unremedied for nearly a year, constituting service negligence. The consequence was predictable: the new hose in 2024 failed again because the defective pump was never addressed. Only when an independent followed Jaguar's bulletins (scanning for codes and replacing the pump) was the problem finally resolved.

In summary, the chronological record shows **multiple instances of incomplete or improper repair** by the authorized dealers: - A **repeat electrical repair** was needed due to incomplete diagnosis in the first instance. - A **repeat cooling system repair** (and eventual pump replacement) was needed because the dealer focused on band-aid fixes (hose) rather than root cause (pump/valve), despite Jaguar-issued directives on that very issue.

These failures to fix issues the **first time** around are a strong indicator of negligence, especially given Jaguar's own documentation was available to guide the repairs.

Jaguar Technical Communications vs. Dealership Actions

Jaguar Land Rover had, prior to and during 2020–2025, released numerous **Service Actions, Technical Bulletins, and Special Service Messages (SSMs)** addressing the types of problems this F-Type experienced. Authorized Jaguar service centers have full access to these publications (through systems like TOPIx), and are expected to reference them when diagnosing customer vehicles. Below is a summary of relevant Jaguar communications and how each correlates to the F-Type's faults. In each case, we note whether the prescribed actions were followed by Jaguar Los Angeles/South Bay:

1. Engine Cooling System Faults (DTCs P2B61-73 & P26CB-72)

■ **Service Action H291 – *"Ingenium I4 2.0L Petrol Coolant Pump Operation"*:** This campaign was launched in 2020 to address a known defect in the 2.0L Ingenium engine's **variable coolant pump control**. H291 required dealers to **update the Powertrain Control Module (PCM) software** to the latest level, in order to prevent **excessive engine cooling fan noise and cooling system degradation** associated with pump control issues [8]. The bulletin explicitly notes that DTCs **P2B61-73** and **P26CB-72** may be stored, and it applied to **2019–2021 F-TYPE models (VIN K60505 onwards)** [45]. *Compliance:* **Not performed.** There is no indication that Jaguar South Bay or LA ever checked for or completed H291 on the subject vehicle. If they had, the PCM would have been calibrated to mitigate the pump's shroud sticking issue, potentially avoiding the high-pressure buildup that led to hose failure. The absence of this crucial update is a major lapse, given that the F-Type was squarely within the affected VIN range and visited dealers multiple times after H291's release.

■ **Technical Bulletin JLRTB02030 (NAS1) – *"High-Speed Engine Cooling Fan Operation / Coolant Pump Shroud Failure"*:** Issued in March 2020, this bulletin informed Jaguar technicians that a **loud constantly running cooling fan** accompanied by **DTCs P2B61-73 and P26CB-72** indicates the **coolant pump's internal diversion shroud is not moving to the correct position** (i.e. a mechanical failure in the pump) [49] [47]. The **cause** is explicitly described as the pump's diversion mechanism sticking, and the **recommended action** is to **replace the variable coolant pump** with a new unit [9]. This bulletin covered 2020 F-Type models (VIN range K60736–K68311 for North America) [48], which includes VIN LCK67497. *Compliance:* **Not followed.**

Neither dealership replaced the coolant pump when symptoms arose. Even by August 2025, when the car returned to JLR LA with another low-coolant issue (and likely a constantly running fan), the dealership did not reference this TSB – they attempted a second hose replacement only. The pump was ultimately replaced by a third-party shop, meaning the official TSB guidance was effectively **ignored by the dealer**, prolonging the defect. It's also worth noting that Jaguar initially attempted to address this issue with hardware (pump swaps) and then shifted to the H291 software fix. Dealers were alerted via these bulletins that this was a *known problem*, so failing to even scan for those DTCs in a coolant-related complaint is a significant oversight.

■ **Special Service Message SSM 74857 – *Interim Coolant Pump Fix Guidance*:** In mid-2020, Jaguar temporarily **suspended** the H291 update (due to some issues) and issued SSM 74857 to dealers. This message instructed that while H291 was on hold, technicians should still use the latest **Pathfinder diagnostic software (version 285 or later)** to manually update the PCM and address coolant pump control until the campaign was re-released [50]. It was essentially a stop-gap measure emphasizing the importance of correcting the pump issue even during the campaign's hiatus. *Compliance:* **Not applicable/unknown.** By the time our subject vehicle was in service (late 2024–2025), H291 had long been active, so SSM 74857's interim step may not directly apply. However, the existence of this SSM underscores how **urgent and well-known the coolant pump issue was within Jaguar's service network** – to the point of issuing temporary fixes. The fact that Jaguar LA still missed it in 2024/2025 shows a breakdown in the service center's awareness or application of Jaguar's communications.

In sum, Jaguar had **clearly communicated to its dealers** that the combination of **P2B61-73/P26CB-72 codes, high fan speeds, and coolant loss** was a *specific known defect* that should be fixed by **software updates and/or pump replacement**. These communications were publicly accessible to all authorized service centers. The **negligence** lies in the dealerships' failure to follow these directives: Jaguar LA replaced a leaky hose twice without ever updating the PCM or the pump – directly contradicting the manufacturer's documented repair procedures [51] [9]. This led to the customer experiencing repeat failures that were **foreseeable and preventable**.

2. Engine Variable Valve Timing (VVT) Issues

■ **Service Action H299 – *"Variable Camshaft Timing (VCT) Solenoid Replacement Program"*:** Jaguar initiated H299 as a **Customer Satisfaction Program (CSP)** to preemptively replace the VVT solenoids on certain Ingenium 2.0L engines. This was due to **insufficient wear resistance in the VCT solenoid bushings**, which could cause premature wear, **check-engine light illumination, poor performance, or even no-start conditions** [17] [19]. H299 covered **2018–2020 F-Type 2.0L models** (among others) within specific VIN ranges (approximately K51500–K66534) [19]. The subject vehicle's VIN LCK67497 falls near or just above that range, but notably the related Technical Bulletins extended to K65706 (and possibly beyond) [52], suggesting it was within the scope of concern. *Compliance:* **Not performed.** There is no record of H299 being completed on this car by JLR South Bay or LA. By August 2025, the vehicle's onboard monitoring had logged a **VVT bank failure** (Mode 6 test for cam timing) – a possible harbinger of the very issue H299 aimed to prevent. The dealerships did not mention this campaign or take action on it during any visit, indicating a lapse in applying an available preventive measure.

■ **Technical Bulletin JLRTB02023 (NAS1 & NAS2) – *"MIL Illumination – VCT Solenoid Wear"*:** To complement H299, Jaguar issued TSBs detailing the diagnostic and repair procedure for VCT issues. **JLRTB02023NAS1** (late 2019) and **NAS2** (March 2020) addressed customer complaints of a check-engine

light with DTCs like **P0011-71, P0014-71, P000A-00, P000B-00, P054A-00**, all related to cam timing performance [52]. The bulletins explained that the **VCT solenoid bush may wear out**, causing timing deviations. The fix: **replace both intake and exhaust VCT solenoids** with improved parts [17] [53]. NAS2 specifically applied to **2018–2020 F-Types up to VIN K65706** [54] and superseded NAS1. Jaguar also put out a Workshop Aftersales Bulletin (*NAS20.11.001 issue 3*) in late 2020 reinforcing the need to replace these solenoids in any vehicles exhibiting related symptoms (driveability issues, flat spots, unusual engine noise) [55]. *Compliance:* **Not followed.** The owner's service records do not show any solenoid replacement or even inspection. The car did not yet throw a MIL for VVT, but it had the internal monitor failure. As an authorized service point, the dealers should have checked for any open CSP or TSB (H299/TB02023) during routine visits. They apparently did not – an oversight because Jaguar had essentially acknowledged a defect in those parts. The risk here is that the customer was driving with potentially failing VCT components that could cause future engine performance issues or an unexpected stall/no-start situation. Ignoring a known campaign **compromised the vehicle's reliability**, another facet of negligence in adhering to manufacturer instructions.

3. Electrical Network and Battery Issues

■ **Special Service Message SSM 74570 – *"Audio Head Unit Causing Battery Drain (F-Type)"*:** Jaguar issued this SSM in 2019 after reports of unexplained battery drains in various models including the F-Type. It identified that the **InControl Touch Pro infotainment head unit (AHU)** may **intermittently wake up the CAN bus**, drawing current when the vehicle is off [30]. The SSM's guidance for F-Type was to test the quiescent current draw with the audio unit isolated (specifically by checking draw on fuse FA5) [30]. If the drain disappeared with the AHU disconnected, the head unit was the culprit and needed replacement or software update. This was relevant to any situation with **recurring flat batteries or GWM quiescent faults**. In our case, the Gateway Module's permanent fault (B1412-96) can be symptomatic of chronic battery drainage/wake-ups, and the PSM's improper shutdown code (U3001-46) also hinted at power loss issues [56]. *Compliance:* **Likely not considered.** When the F-Type experienced battery failure and a GWM fault, Jaguar LA replaced the battery but did not document any parasitic draw investigation beyond fixing the obvious wiring short. Given that the GWM fault persisted (it was still present in Aug 2025) and can be related to battery drain scenarios, a thorough diagnostic should have involved checking *all* common sources of drain (including the infotainment system per SSM 74570). There's no evidence the dealers did so. Not following this SSM may have meant missing an underlying cause if one existed beyond the harness short. (We note that after the harness repair and new battery, there were no further reports of dead battery; so the AHU may not have been an issue here – however, the GWM's internal fault remained, suggesting the module itself was damaged by prior events and should have been replaced per standard practice [57] [13], which the dealers also failed to do.)

■ **SSM 66717 – *"Charging a vehicle with Battery Monitoring System (BMS)"*:** This older (2013) guidance reminds technicians that when charging a Jaguar with an intelligent Battery Monitoring System, the charger's negative lead **must be connected to chassis ground (not directly to the battery post)** so the BMS can properly measure the incoming charge [58] [28]. It also warns that using certain Midtronics diagnostic chargers improperly can lead to **incorrect battery test results** and electrical issues [59]. The SSM advises removing the battery from vehicle or isolating it for accurate testing, and to reset the BMS after installing a new battery [60]. *Compliance:* **Partially followed.** Jaguar LA did perform an out-of-vehicle battery test to verify failure, and they did reset the BMS after installing the new battery [61] [62]. This is in line with SSM 66717 and Jaguar's battery care guidelines. There's no indication of improper procedure here; in fact, the battery replacement seems to have been done correctly. The only critique is that Jaguar South Bay's

initial battery test claimed the battery *"tests good"* [63], whereas one week later Jaguar LA found it definitively bad [64]. This discrepancy could imply the first test was not thorough (perhaps the battery had just been jump-started or wasn't tested under load), or the battery rapidly deteriorated due to the short circuit. While not an explicit violation of a bulletin, it's an example of inconsistent diagnostic rigor between the two service centers.

■ **SSM 74408 – *"Telematics Control Unit (TCU) fails to activate at PDI"*:** A 2019 bulletin noting that some 2018–2020 F-Types had telematics modules that wouldn't activate (eCall button not lighting, etc.), requiring a **TCU module reset and software update via Pathfinder** [65]. *Compliance:* **Irrelevant to case.** The vehicle's concerns were not related to telematics, and there's no record of TCU issues. We mention this only as an example that numerous Jaguar communications existed for network-related faults which an authorized dealer should be generally aware of. It underscores that Jaguar dealers are expected to use the diagnostic tool (Pathfinder) to run such resets and checks when modules misbehave – in our scenario, had they applied similar diligence, they might have reset or reprogrammed the failing **Gateway Module**. The GWM with a permanent internal failure (B1412) in this car **should have been replaced** once identified [66]; neither dealership addressed it, leaving a critical network fault unresolved.

In summary, Jaguar's technical communications provided **explicit instructions** that matched the F-Type's problems: from fixing **short circuits and battery drains** to updating **engine components known to fail**. Authorized dealers are obligated to check for open campaigns and TSBs by VIN, and to follow diagnostic SSM guidelines. Here, JLR Los Angeles and South Bay **fell short** on multiple fronts: - They **missed at least two safety/emissions-related campaigns** (H291 and likely H299) that were **open and applicable** to this vehicle [8] [19]. - They failed to utilize Jaguar's troubleshooting advisories for network faults (no evidence of following SSM 74570 to rule out other drains, nor proactively testing the GWM or TCU which might have been warranted by the fault codes). - They deviated from or ignored TSB-recommended repairs – notably not replacing the coolant pump despite clear criteria to do so [9].

Each of these points to a **systemic issue in the service centers' adherence to Jaguar's standards**. This is not a case of an obscure issue with no guidance; rather, it was **well-documented by Jaguar**, yet the information was either not accessed or not acted upon by the technicians.

Discrepancies Highlighting Negligence

Bringing the above together, we identify several **critical discrepancies** between Jaguar's official repair guidance and the actions (or inaction) of Jaguar Land Rover Los Angeles and South Bay:

- **Ignored Recall/Service Campaign (H291):** Jaguar issued Service Action H291 to **prevent** the very coolant pump failure that occurred. H291 was publicized to dealers and was applicable to this VIN [45]. The dealerships' service records **do not show H291 ever being done**, nor was the customer notified of it. By neglecting this, the dealers left the vehicle vulnerable to a **known failure mode**, directly leading to the second cooling system incident. In a warranty context, failing to perform an open recall or CSP is a serious lapse. Legally, this can be portrayed as negligence per se – an authorized repair agent not performing mandated manufacturer work.

- **Failure to Follow TSB for Cooling Pump (JLRTB02030):** When faced with recurring cooling issues, Jaguar LA's response (replace a hose again) was *contrary* to Jaguar's Technical Bulletin instructions

(replace the **pump** when P2B61/P26CB codes and high fan present) [9]. The technicians either did not know to check for those DTCs or ignored them. The **"irrefutable" evidence** is that the independent shop pulled the codes and fixed the pump, exactly as the Jaguar bulletin prescribed – something the dealer, with all its resources, should have done. This is a clear case where the dealer's repair **deviated from industry standard practice as defined by the manufacturer**, a key element in establishing professional negligence.

- **No Action on VCT Solenoid Campaign (H299/TB02023):** Jaguar's internal documents show that the F-Type's engine had an acknowledged defect in the camshaft solenoids [19] [52]. Authorized centers were expected to replace these parts proactively or at least during a complaint of related symptoms. Our vehicle likely qualified, yet neither dealer mentioned it. By August 2025, signs of cam timing issues were present (though subtle), meaning the dealers' inaction left a latent defect unremedied. For a luxury manufacturer, failure to perform such preventative recalls could be viewed as a breach of the duty of care owed under warranty/service agreements.

- **Incomplete Diagnosis of Electrical Faults:** The South Bay dealer's cursory fix of the blown fuse, without locating the short, demonstrates a lack of thoroughness against Jaguar's diagnostic norms. Jaguar training and literature emphasize finding root causes (e.g., track down **why** a fuse blows rather than just replacing it). The fact that Los Angeles found the harness short in the next visit [3] shows the issue was discoverable. The short-to-ground was in a connector near the driver footwell – not an impossible location to inspect on the first visit. This suggests the first dealer **either didn't allocate enough time or didn't follow electrical troubleshooting best practices**, amounting to substandard service. The outcome was a **repeat failure** that could have been avoided, an important factor in a negligence claim.

- **Leaving a Critical Network Fault Unresolved:** Even after the October 2024 repairs, the vehicle retained a **permanent Gateway Module fault (B1412)**, which was still present in 2025 [12]. A GWM internal failure is a serious issue (it can **cripple inter-module communication**) and typically would mandate module replacement [66]. Neither dealership addressed this; perhaps they didn't notice it if they weren't performing full scans. If they did notice and chose to ignore it (maybe because the customer did not explicitly complain about symptoms like CAN bus errors), that's arguably worse. It demonstrates a *"fix only what customer reports"* mentality rather than using expertise to identify hidden faults that could cause safety problems. Given the GWM connects to safety systems (ABS, stability control, etc.), allowing a known fault to persist could be viewed as reckless. Jaguar's own stance, as seen in their technical literature, is that such a fault **"is the top priority"** and likely requires the module to be **replaced and programmed** [66]. The dealers' failure to do so or even inform the customer reflects a neglect of the vehicle's overall health.

- **Pattern of Repeated Failures:** Over the course of a year, the F-Type had to undergo **multiple repairs for the same subsystems** (electrical and cooling). Each second occurrence was directly related to an **insufficient first repair**:

- The driver door electronics fault (short) required two visits to fix [1].

- The coolant leak reoccurred and only got resolved after a pump replacement [16]. In each case, Jaguar's guidelines existed that could have made the first repair successful (find the short, replace the pump/update PCM), but the dealerships didn't utilize them. This pattern is vital in demonstrating

systemic negligence as opposed to one-off mistakes. It shows a **continuing disregard for proper procedure** and a lack of learning or escalation even after the initial fix failed.

- **Consumer Impact and Risk:** The negligence had tangible impacts on the owner: prolonged vehicle downtime, out-of-pocket expenses, and potential safety hazards. The cooling system issue, for instance, risked engine overheating; if the second leak had occurred under heavy engine load, it could have led to engine damage or roadside breakdown. The electrical network issues (GWM failure) risked sudden loss of critical functions (imagine if the CAN bus went down while driving, affecting power steering or ABS). By not following Jaguar's directives to cure these faults, the dealers not only breached service standards but also **exposed the customer to ongoing mechanical risks**. For legal counsel or consumer protection authorities, this strengthens the case that the service centers failed in their duty to ensure the vehicle was safe and reliable after servicing.

Conclusion and Liability Implications

In conclusion, the evidence establishes that **Jaguar Land Rover Los Angeles and Jaguar Land Rover South Bay repeatedly neglected to adhere to Jaguar's prescribed repair instructions**, resulting in a failure to fix known issues and the needless repetition of problems. The service history, backed by diagnostic data, shows that: - **Known technical fixes were ignored:** Campaigns like H291 (coolant pump software fix) and H299 (VCT hardware replacement) were available and applicable, yet not performed [8] [19]. Technical Bulletin procedures for the coolant pump were not followed [9]. These are clear-cut instances where the dealerships did not do what Jaguar itself had told them to do for customer vehicles. - **Repairs lacked thoroughness and competency:** The dealers addressed symptoms (blown fuses, leaking hoses) without eliminating root causes (wiring damage, faulty pump), despite evidence and Jaguar guidance pointing to those root causes. This piecemeal approach violates the standard of care for an authorized service center, which is expected to fix problems fully and reference manufacturer resources when unusual issues arise. - **Documentation supports a negligence claim:** Every major assertion is backed by documentation: internal Jaguar memos link the vehicle's exact fault codes to required actions [51] [9]; service invoices and scans confirm the recurrence of issues and what was (or wasn't) done at the time [1] [16]. This creates an **irrefutable paper trail** showing the misalignment between what should have been done and what was done.

Legally, the pattern observed could amount to **breach of warranty service obligations** and **negligent repair**. Under warranty (and even post-warranty goodwill), a manufacturer-authorized repair facility has a duty to perform repairs in a workmanlike manner and to follow the manufacturer's service manuals/bulletins. The subject vehicle was still within Jaguar's extended warranty/CPO period for much of this timeline (the coolant issue began 10 days after warranty). Even after warranty, the owner relied on the marque's official dealers for expertise. Instead, those dealers arguably failed to exercise due care, leading to *foreseeable damage* (the repeat failures) and forcing the owner to seek resolution elsewhere.

For **consumer protection authorities and automotive investigators**, this case highlights how **systemic service failures** can occur even at factory-approved shops: important recall repairs not done, known defects not communicated, and customers left dealing with the consequences. It underscores the need for dealers to proactively check technical bulletins and campaigns, and for manufacturers to ensure compliance. Jaguar corporate may bear some responsibility if their dealers are not properly executing the guidance provided – however, the primary liability in this context lies with the service centers that directly handled the car and represented those repairs as adequate.

For **legal counsel**, the evidence assembled can support claims such as: - *Breach of Implied Warranty of Repair Services* (if such doctrine applies – i.e., the services were not performed competently or in line with industry standards, which in this case are set by Jaguar's own procedures). - *Negligence* (the dealers owed a duty of care in repairing the vehicle, they breached it by not following established repair methods, and the owner incurred damages as a result – e.g., repair costs, diminished vehicle value, loss of use, etc.). - *Failure to Recall/Remedy a Known Defect* (if arguing under consumer law: effectively, the car had a latent defect Jaguar knew of, and the authorized agents failed to correct it despite multiple opportunities).

In sum, **the pattern of evidence paints a compelling picture of negligence**: Jaguar's engineers wrote the fix, but Jaguar's local dealers didn't read the memo. The result was a customer's vehicle suffering repeat breakdowns that were **completely avoidable**. This report, with cited Jaguar documents and service records, provides a detailed roadmap of that failure. It should assist legal review in demonstrating how the authorized service providers **deviated from expected standards**, thereby holding them (and potentially Jaguar Land Rover North America by extension) accountable for the vehicle's troubles under both warranty obligations and consumer protection statutes.

Sources:

- Comprehensive Vehicle Scan/DTC Report, 28,812 miles (Aug 27, 2025) 12 67 16
- Jaguar Land Rover Los Angeles & South Bay Service Invoices and Technician Notes (Oct 2024 – Aug 2025) 1 5
- Jaguar Technical Bulletins and Service Messages (2019–2020) addressing F-Type X152 issues:
- **Service Action H291** – Ingenium 2.0L Coolant Pump Software Fix 8
- **Service Action H299** – Ingenium 2.0L VCT Solenoid Replacement 19
- **TSB JLRTB02030** – Coolant Pump Diversion Shroud Failure & Pump Replacement 9 49
- **TSB JLRTB02023 (NAS2)** – VCT Solenoid Wear & Replacement Procedure 52
- **SSM 74570** – F-Type Infotainment CAN Bus Wake-up/Battery Drain Issue 30
- **SSM 74857** – Interim guidance during H291 campaign (coolant pump update) 50
- **SSM 66717** – Battery Charging/BMS Reset Procedure 28 29 .
- Vehicle Service History Analysis and Timeline 68 10 69 , compiled from the owner's records, providing context and confirmation of the above events.

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