

**EA02-025**

**10-28-03**

**FORD 10/28/03  
LETTER TO ODI**

**BOOK 1 OF 2**

**PART A - D**

**PART A**



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0002-020-3 1947

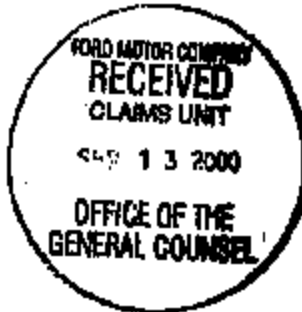


# State Farm Insurance Companies



September 5, 2000

Ford Motor Company  
16800 Executive Plaza Dr.  
Dearborn MI 48126



Claim Office  
2411 Springer Road  
P.O. Box 720800  
Norman, OK 73070-4700  
(405) 366-6900  
Office Hours: Mon-Fri 8:00-5:00

RE: Claim Number: [REDACTED]  
Our Insured: [REDACTED]  
Date of Loss: July 22, 2000  
1995 Lincoln Town Car 4-door  
a/n1LNLM82W3EY665153

Dear Sirs:

The identified 1995 Lincoln is insured by State Farm. This vehicle experienced fire damage caused by a wiring failure as a result of a gradual deterioration process which is a consequence of the original installation.

State Farm would like to give you an opportunity to inspect the damaged wiring and give you advance notice of our potential subrogation claim.

Please contact me if you have any questions.

Sincerely,

Kay Lauderdale  
Claim Representative  
(405) 366-5948

State Farm Mutual Automobile Insurance Company

CUSTOMER SUPPORT  
CENTER  
SEP 13 10 12 AM '00

# State Farm Insurance Companies



Dec. 9<sup>th</sup>  
September 5, 2000

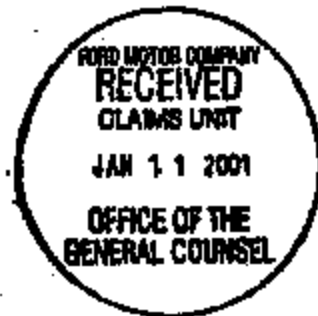
*Proc  
#33257  
A.R.*

Claim Office  
2411 Spring Road  
P.O. Box 720800  
Norman, OK 73070-4700  
(405) 266-6900  
Office Hours: Mon-Fri 8:00-5:00

Ford Motor Company  
16800 Executive Plaza Dr.  
Dearborn MI 48126

OFFICE OF THE SECRETARY  
JOHN W. ...

*IM*  
01 JAN -5 P2:14



RE: Claim Number: [REDACTED]  
Our Insured: [REDACTED]  
Date of Loss: July 22, 2000  
1995 Lincoln Town Car 4-door  
s/n1LNLM82W38Y665153

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State Farm would like to give you an opportunity to inspect the damaged wiring and give you advance notice of our potential subrogation claim.

Please contact me if you have any questions.

Sincerely,

*TD*  
~~Ray Laudensate~~ *Travis Daugherty*  
Claim Representative  
(405) 366-6948 (918) 641-7337

State Farm Mutual Automobile Insurance Company

# COPY

File

Office of the General Counsel

Ford Motor Company  
Parklane Towers West  
Suite 400  
Three Parklane Boulevard  
Dearborn, Michigan 48120-5000  
Facsimile: (313) 548-6288

TP

October 2, 2000

State Farm Insurance Company  
P.O. Box 720900  
Norman, OK 73070-4700  
**ATTENTION: KAY LAUDERDALE**

Re: Claimant: [REDACTED]  
D/L: July 22, 2000  
Y/Claim #: 86-A182-607

Dear Ms. Lauderdale:

We acknowledge your recent contact to Ford Motor Company. Your complaint has been directed to this office for further handling. In order to assist us in evaluating your claim, we request that you provide us with the following information:

- 1. The date of incident and the city and state in which it occurred.
- 2. A complete description of the incident, including events which occurred prior to and subsequent to the loss.
- 3. A copy of the police and/or fire report. *None available.*
- 4. For each person alleged injured: full name, date of birth, home address, marital status and name of spouse, social security number, occupation, a complete description of the injuries, the names and addresses of all treating physicians, and copies of all medical bills and reports.
- 5. The vehicle year, model, and serial number.
- 6. The mileage on the vehicle at the time of the incident.
- 7. Original photographs of the vehicle's damage, *from several different angles, or color laser copies. Enclosed.*
- 8. Original photographs of the inside of the vehicle showing the steering wheel, dash and roof areas.
- 9. Original photographs of the accident scene showing the grade of the road.
- 10. What is the alleged defect? *Faulty wiring due to manufacturer's installation.*
- 11. Documentation to substantiate your defect allegation, including a copy of your expert's report and the expert's original photographs. *Enclosed.*
- 12. Has the alleged defective part been repaired or replaced?  *Yes.*
- 13. The present location of the alleged defective part and the vehicle. *without insured.*
- 14. The repair estimate, repair order, or your total loss worksheet for the vehicle's damage, and copies of draft payments. *Enclosed.*
- 15. A complete service history for the subject vehicle, including any tune-ups or oil changes.
- 16. List any after market additions or modifications that were made to the vehicle.

OCT 09 2000

1992-025-0 1950

- 17. We will be pleased to conduct non-destructive testing on your alleged defective part should you choose to remove the part and assembly and ship it at your own expense. Please follow the directions listed in the attached shipping instructions.
- 18. Lost wage verification (if applicable).
- 19. Was the parking brake applied?
- 20. Was the engine running?
- 21. Were the keys in the ignition?
- 22. Has any insurance company been advised of this incident? If so, please state the name, address, and telephone number of those insurance companies; their claim number, and the agent's name.
- 23. If an attorney has been retained by you to settle this claim, please include his/her name, telephone number, and address.
- 24. If this vehicle was purchased as used by the insured please provide: the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased.
- 25. Other: Estimate and photographs of property damage, repair orders, or your total loss worksheet for the property damage, and copies of draft payments.

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decision concerning your claim. Should you not send all of the requested information and materials within 45 days, we will assume that you are not interested in pursuing a claim and we will close our file.

Please be advised that all necessary steps must be taken to ensure that the subject vehicle and all of its component parts are maintained and preserved for trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

If you propose to repair the vehicle for continued usage, such repairs may not be performed until after Ford Motor Company has inspected the vehicle and removed and tested any component part you claim to be defective or advised you in writing that it does not intend to perform such inspection and/or testing at this time. But even in that event, Ford Motor Company will insist that all components claimed to be defective are maintained and preserved for trial.

Should you have questions, please contact me at (818) 248-7781 or at the above address.

Sincerely,



Allen Robinson  
Litigation Assistant

OCT 09 2000

2

1992-225-B 1991









**ASSOCIATED METALLURGISTS**

P.O. BOX 201 • NORMAN, OKLAHOMA • 73070 • (405) 829-1489

September 1, 2000

Key Lauderdale  
State Farm Insurance Co.  
P. O. Box 720900  
Norman, Oklahoma 73070

CLAIM No. [REDACTED]  
1995 Lincoln Town Car

Dear Ms. Lauderdale:

Enclosed please find one set of our "PHOTOGRAPHS OF THE 1995 LINCOLN TOWN CAR AND THE ELECTRICAL WIRING," which were made during our examinations in the referenced matter. The car was photographed at Bill's Auto Service in Chickasha. At that time most of the rewiring and repairs to the vehicle had been completed. All of the wiring that had been removed by Bill's was taken to our laboratory for detailed examination. The wiring is available for your inspection.

The photographs demonstrate that the damage initiated in a loop of wiring beneath the head liner on the left side of the car. The wiring terminated in a plug which connected to the driver's vanity mirror. The photographs show that the insulation on the green/orange wire is melted in the loop and throughout the length of the same wire leading to the loop. Significantly, there is no melting between the loop and the plug. This indicates that the electrical fault which caused the wire to overheat originated at the loop. Since there is no evidence of overheating of the black wire (the only other wire involved in the loop) it further can be concluded that the green/orange wire shorted to ground, the body of the car, rather than to the black wire. At the time of this examination, the head liner of the

SEP 05 2000

ENR2-829-8 1994

Kay Lauderdale  
September 1, 2000  
Page 2.

car had already been replaced. However, the service technician indicated that the wiring was pressed against the metal roof by the head liner. With the presence of crossed wires in the loop, the effective thickness of the wiring was locally increased. This extra thickness, together with the action of the head liner would act to chafe the insulation where the wires were crossed and eventually cause the short circuit that resulted in overheating of the wire.

Damage to the insulation covering the green/orange wire was substantial, exposing lengths of the bare copper conductor at several locations and blistering the insulation on other adjacent wires. The course of the green/orange wire was traced through the wiring that had been removed from the car. As shown in the photographs each of the large wiring harnesses were affected by the short circuited green/orange wire.

Because the wiring in which the short circuit initiated is beneath the head liner and inaccessible to the vehicle occupants, the failure cannot be attributed to any action by driver or passengers. Instead the wiring failure appears to be the result of a gradual deterioration process which is a consequence of the original installation by the vehicle manufacturer.

I will retain the wiring which was removed from the vehicle, pending your advice regarding its disposition. I appreciate the opportunity to work with you and State Farm on this matter.

Sincerely,



Robert Jay Block, Ph.D, P.E.  
Consulting Metallurgical Engineer

Enclosures

LAUDERDALE.LAT

SEP 05 2000

0002-025-0 1035



**ASSOCIATED METALLURGISTS**

P.O. BOX 201 • NORMAN, OKLAHOMA • 73070 • (405) 522-1422

September 1, 2000

**PHOTOGRAPHS OF THE 1995 LINCOLN TOWN CAR  
AND THE ELECTRICAL WIRING**

Taken: August 22, 2000  
At: Bill's Auto Service  
208 Florida Street  
Chickasha, Oklahoma  
And: Associated Metallurgists

In the matter of:

**CLAIM NO.: 36 - A132-607**

**[REDACTED] 1995 LINCOLN TOWN CAR**

Submitted to:

**KAY LAUDERDALE  
STATE FARM INSURANCE CO.  
P. O. BOX 720900  
NORMAN, OKLAHOMA 73070**

Robert Jay Hlock, Ph.D., P.E.  
Consulting Metallurgical Engineer

SEP 05 2000

## LIST OF FIGURES

### Photographs Of The Lincoln Town Car

- Figures 1 and 2. Overall views of the rear portions of the Lincoln Town Car.
- Figure 3. Manufacturer's identification label at the driver's door. The car was made in December, 1994 and was assigned the vehicle identification number, 1LNLM2W35TY665183.
- Figure 4. Interior of the vehicle showing the driver's side dashboard. The radio and other components occupying the center position had not been replaced at the time of this examination.
- Figure 5. Overall view of the driver's position showing the sun visor and adjacent areas of the head liner. The wiring within the head liner and other areas of the vehicle interior had been replaced at the time of this examination.
- Figures 6 and 7. Driver's vanity mirror on the left-side sun visor.
- Figures 8 through 10. Closer views of the driver's sun visor. Figure 8, shows the visor with the mirror in the up position. Figure 9 shows the visor lowered in a position comparable to Figs. 6 and 7. In Fig. 10 the visor has been moved to the left and the secondary visor has been lowered to show the head liner at the attachment location.

### Photographs Of The Electrical Wiring From The Lincoln Town Car

- Figure 11. Overall view of the wiring harness leading to the driver's vanity mirror. The letters shown in the photograph correspond to the locations which are shown in greater detail in the photographs which follow. The connector leading to the driver's vanity mirror is located near the upper left corner of the photograph and is designated as "A". The loop of wiring which is the origin of the electrical fault that caused overheating of the green/orange wire is at location "B".
- Figures 12 through 14. Closer views of the loop of wiring at location "B," the origin of the electrical fault. The photographs show the insulation melted away from the underlying copper wire, in the green/orange conductor. The black wire which also leads to the driver's vanity mirror plug was found to have been undamaged except where its insulation was heated by contact with the

## LIST OF FIGURES (Contd.)

- Figures 12 through 14. (contd.) neighboring green/orange wire. The photographs demonstrate that there was no damage to either wire beyond the location where the wires cross in the loop verifying the location of the fault. These views show the side of the wire loop which was believed to have been in contact with the underside of the vehicle head liner.
- Figures 15 through 17. Underside of the loop of wiring at the origin of the electrical fault. These views show the side of the loop which was believed to have been placed against the underside of the car body beneath the head liner. The photographs show a few of the wires which were exposed to contact the car body, causing the electrical fault.
- Figure 18. Overheated wire and melted insulation on the green/orange conductor at location "C" as seen in Fig. 11.
- Figure 19. Overheated wire and melted insulation on the green/orange conductor at location "D" as seen in Fig. 11.
- Figure 20. Overheated wire and melted insulation on the green/orange conductor at location "E" as seen in Fig. 11. The wires shown in this photograph lead to a connector which joins the wiring shown in Fig. 11 to a second wiring harness seen in Fig. 22.
- Figure 21. Overheated wire and melted insulation on the green/orange conductor at location "F" as seen in Fig. 11. The ends of the wires shown in this photograph were cut from the connector seen in Fig. 24.
- Figure 22. Overall view of the wiring harness which leads to the wiring at the driver's vanity mirror (seen in Fig. 11). The connector which was attached to the wires seen in Fig. 21 is shown at location "G" in this photograph.
- Figure 23. Closer view of the wiring in the proximity of the connector leading to the wiring for the driver's vanity mirror. The connector at location "G" in Fig. 22 is given the same designation in this photograph.
- Figures 24 and 25. Wiring leading into and out from the plug at location "G" and "H". (seen in Fig. 23) The insulation on the green/orange conductor is melted and the wire has been overheated.
- Figure 26. Overheated wire and melted insulation on the green/orange conductor at location "T" as seen in Fig. 22.

## LIST OF FIGURES

- Figure 27. Overheated wire and melted insulation on the green/orange conductor at location "J" as seen in Fig. 22.
- Figure 28. Overheated wire and melted insulation on the green/orange conductor at location "K" as seen in Fig. 22.
- Figure 29. Overheated wire and melted insulation on the green/orange conductor at location "L" as seen in Fig. 22.
- Figures 30 and 31. Overheated wire and melted insulation on the green/orange conductor at location "M" as seen in Fig. 22.
- Figures 32 and 33. Overheated wire and melted insulation on the green/orange conductor at location "N" as seen in Fig. 22.
- Figures 34 and 35. Connector leading from the wiring harness shown in Fig. 22 to the wiring harness seen at location in "P" Fig 34. Figures 23 through 35 trace the course of the overheated green/orange wire through the second wiring harness to the connector plug (Fig. 35) through which it was joined to the third wiring harness shown in the following photographs.
- Figure 36. Overall view of the third wiring harness removed from the Lincoln Town Car. Connector "O" shown in Figs. 22 and 32 was mated with connector "P" shown near the lower left corner of this photograph.
- Figures 37 and 38. Connector "P" (Fig. 35) and the overheated wire and melted insulation on the green/orange conductor leading into the third wiring harness seen in Fig. 35.
- Figures 39 and 40. Overall and closer views of the connector at location "Q" in Fig. 36. Figure 40 shows the overheated wire and melted insulation on the green/orange conductor at the connector. The damaged wire runs in a bundle of wires, from the connector shown in Figs. 36 and 37 directly to the connector seen in these photographs.
- Figure 41. Wiring leading into the rear of the fuse block seen at location "R" in Fig. 34. None of the wires were noted to have melted insulation or evidence of overheating.

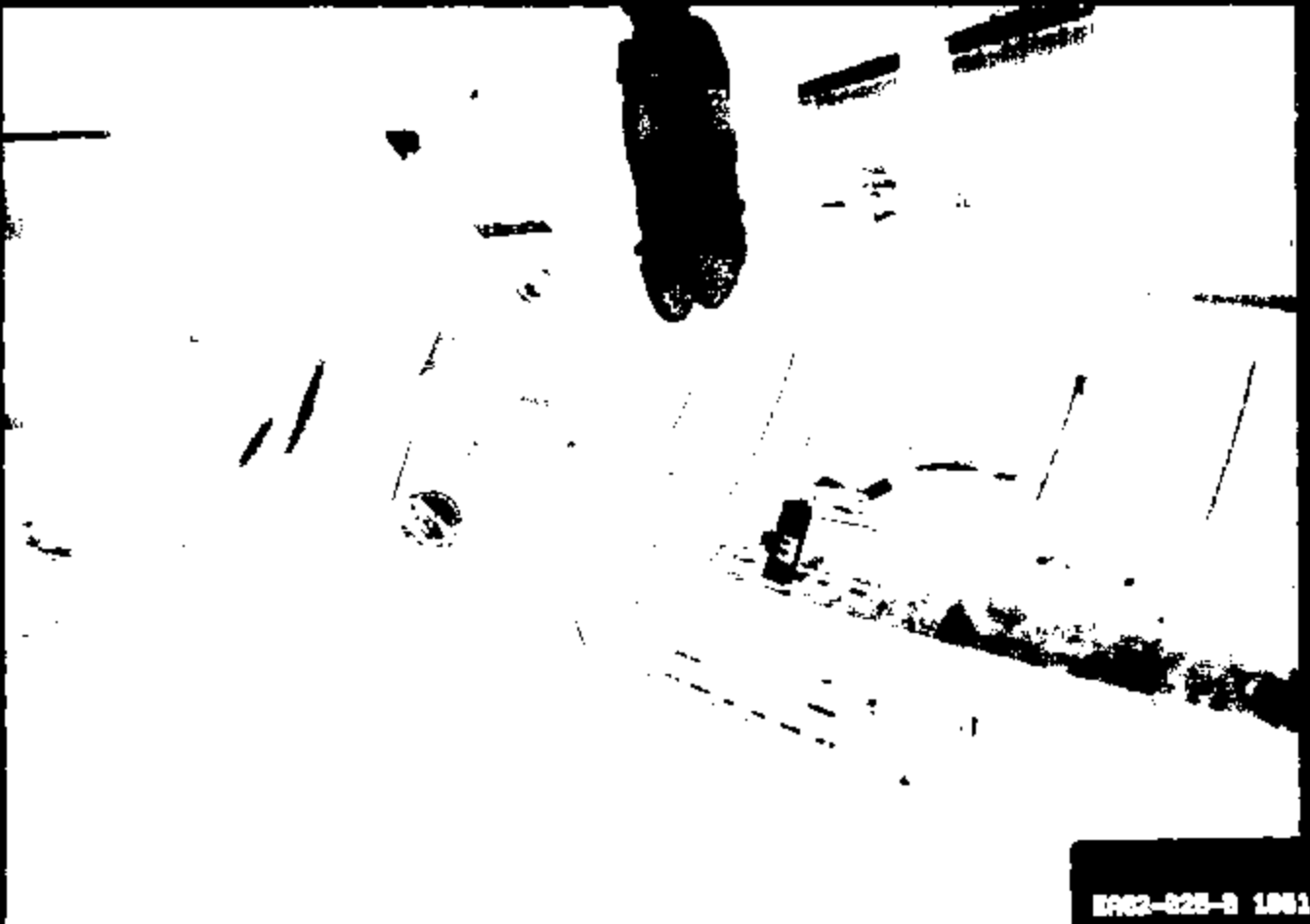


5002-028-B 1000

MFD. BY FORD MOTOR CO. IN U.S.A.  
DATE: 12/96 GWR: 5417LB/2457KG  
FRONT GWR: 2588LB 1173KG  
REAR GWR: 2878LB 1303KG

THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR  
VEHICLE SAFETY, MODEL, AND THEFT PREVENTION STANDARDS  
AS SEEN ON THE DATE OF MANUFACTURE SHOWN ABOVE.

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8902-025-2 1991

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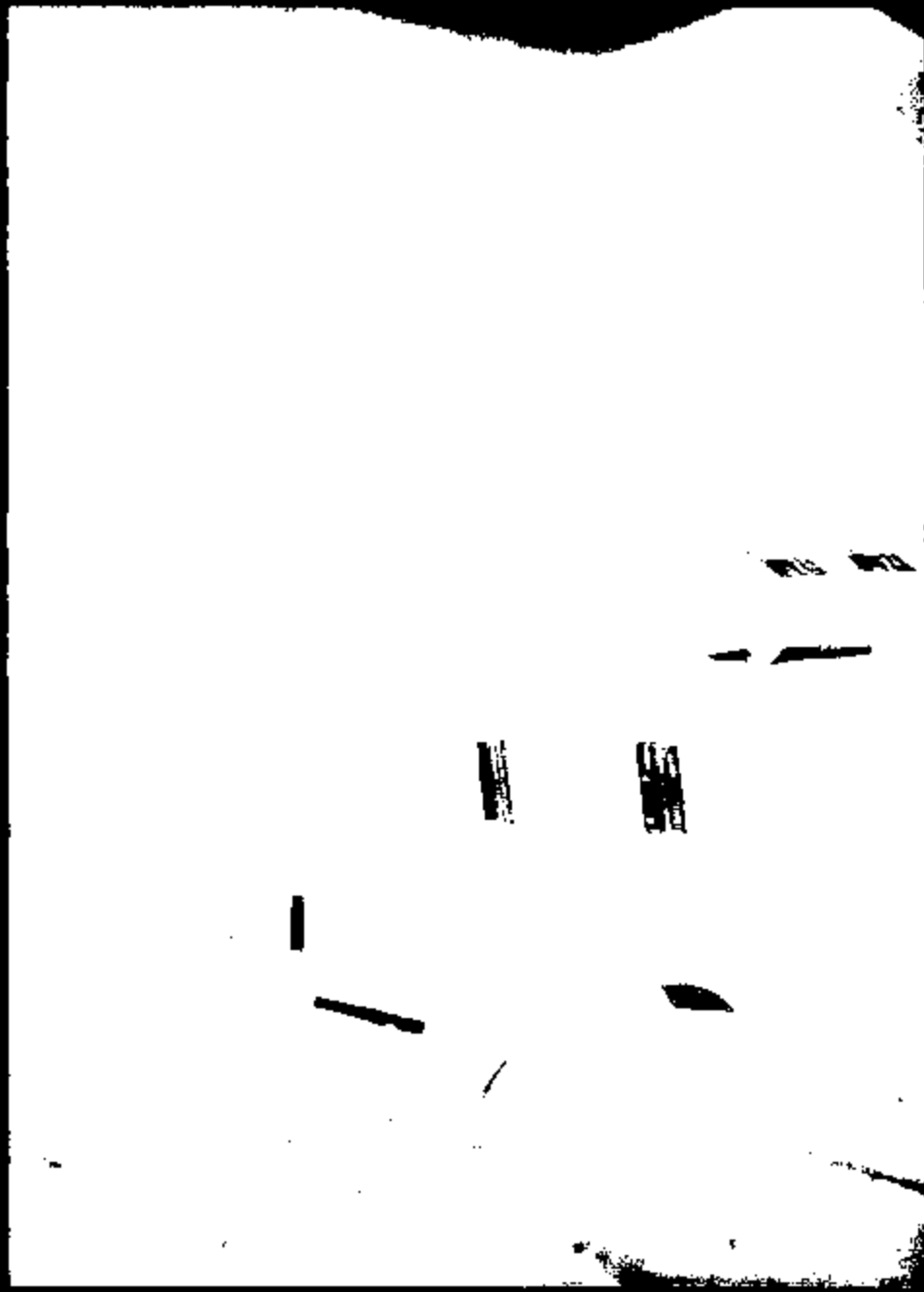
AN ASSOCIATED COMPANY



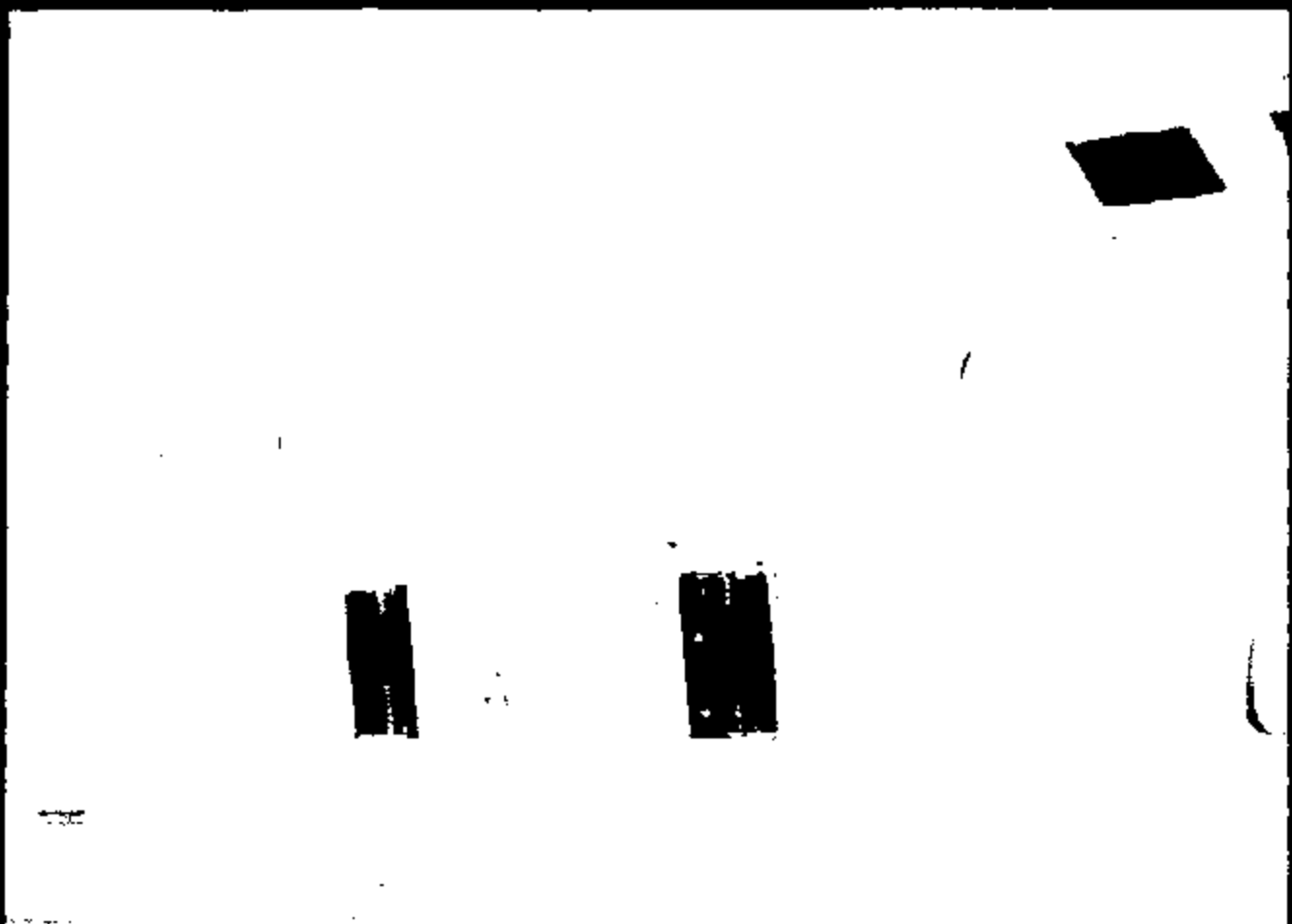


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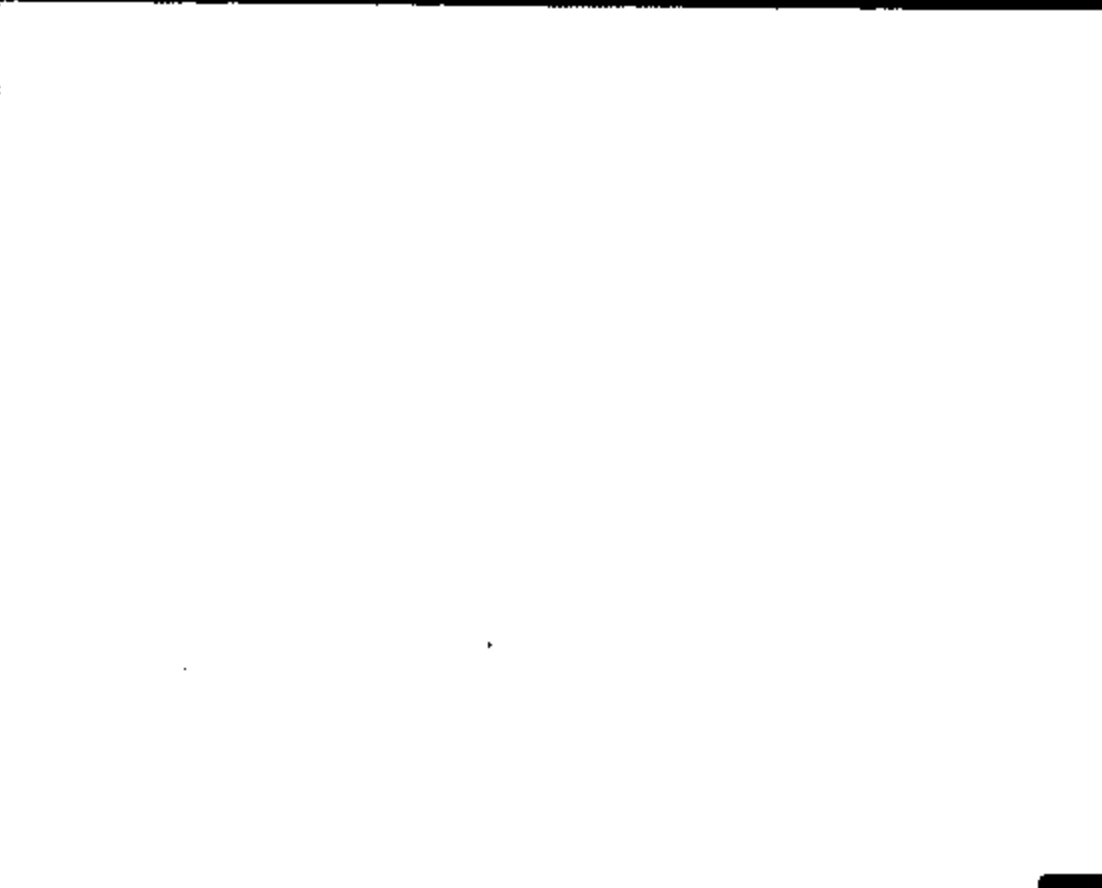
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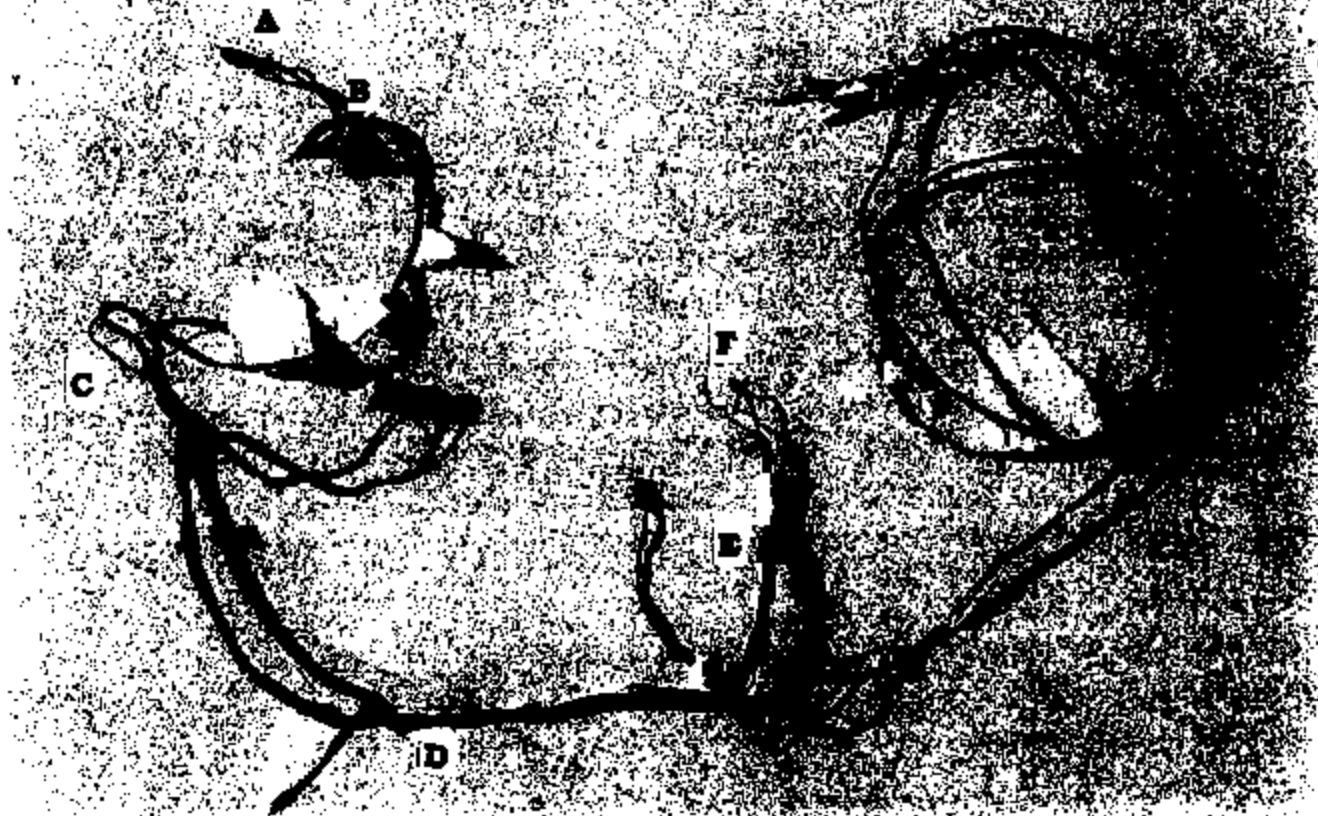
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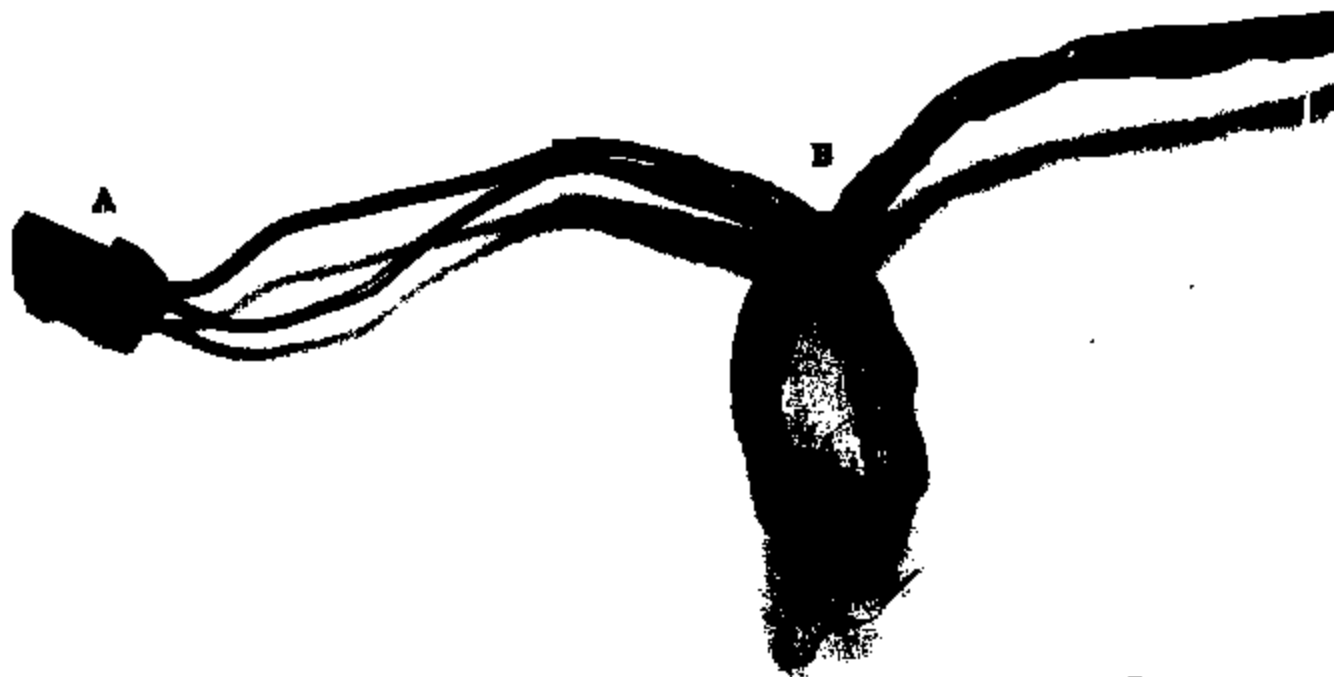


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ER02-025-B 1985

ASSOCIATED METALLURGISTS



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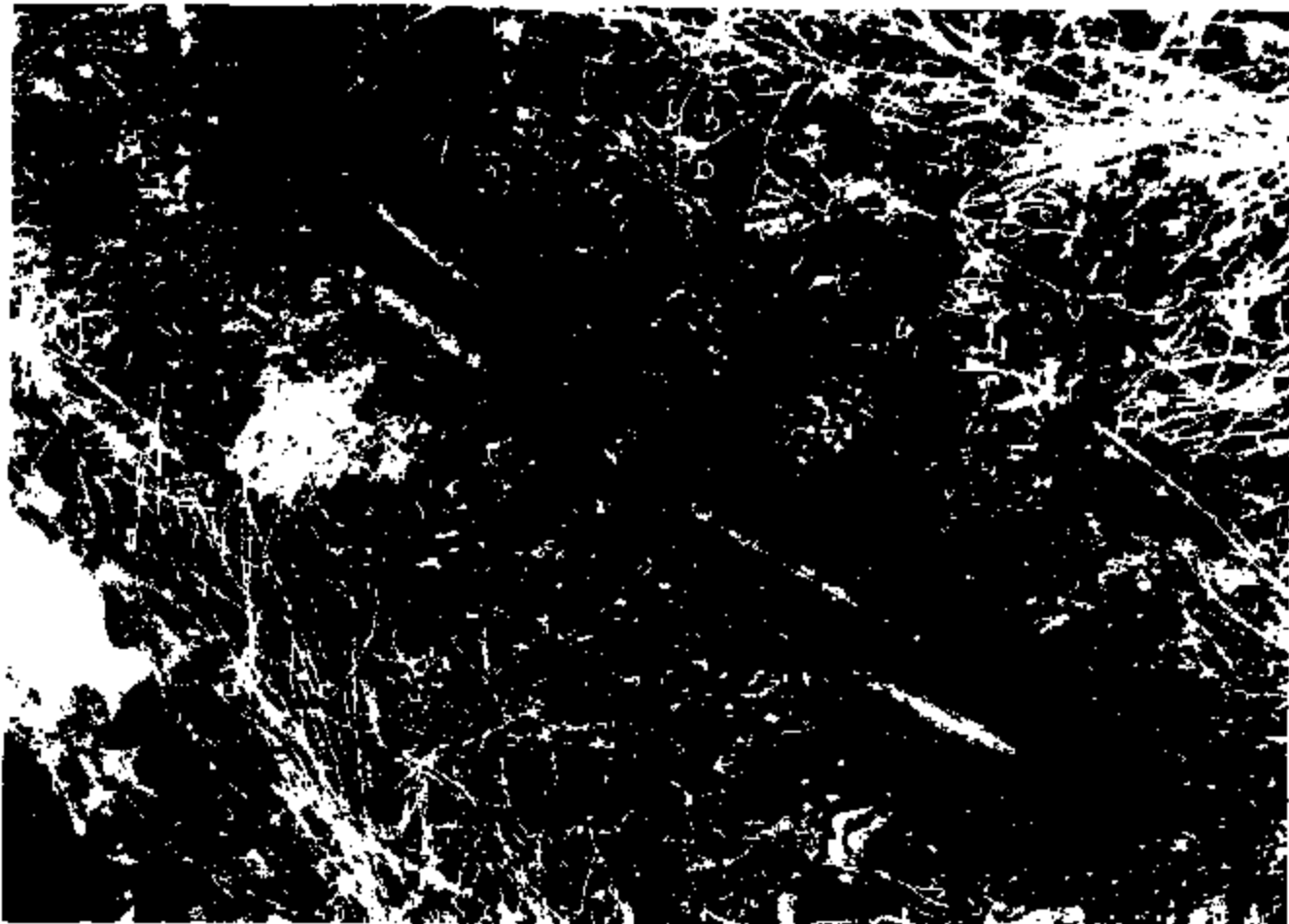


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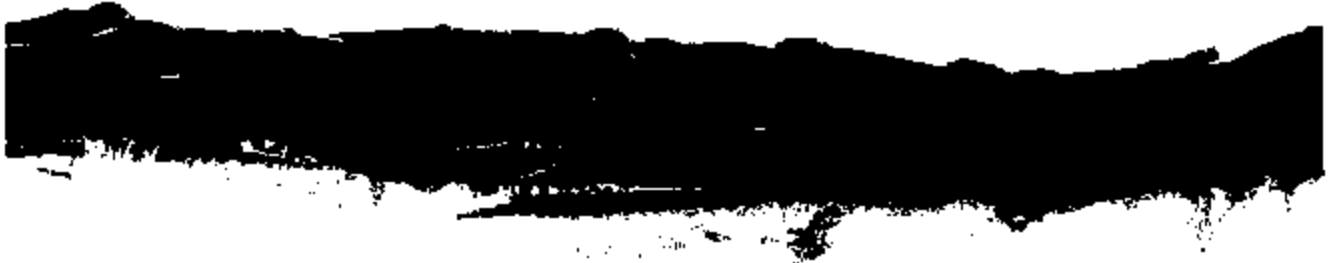
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18

EM2-025-8 1968

THE ASSOCIATED BENTLEY SYSTEMS



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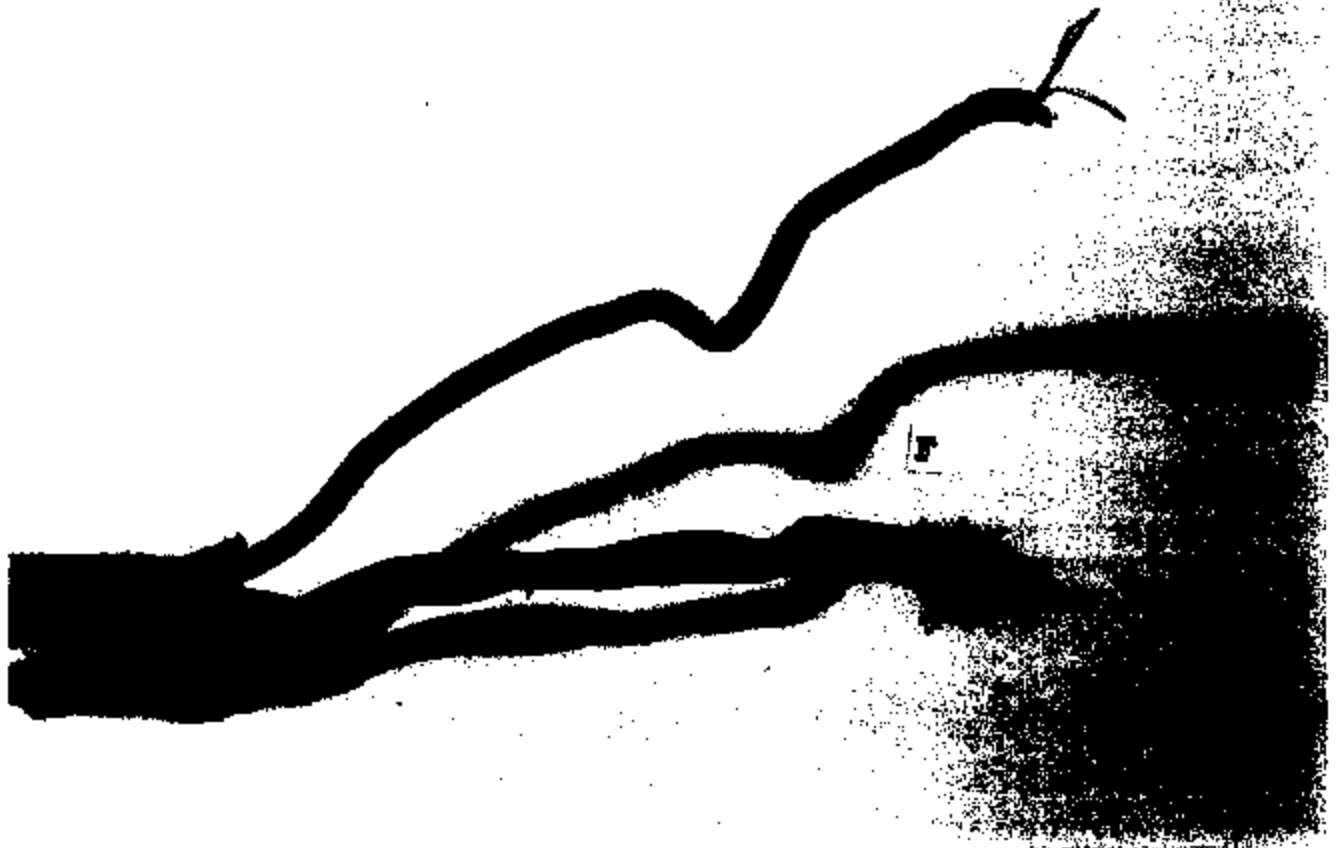


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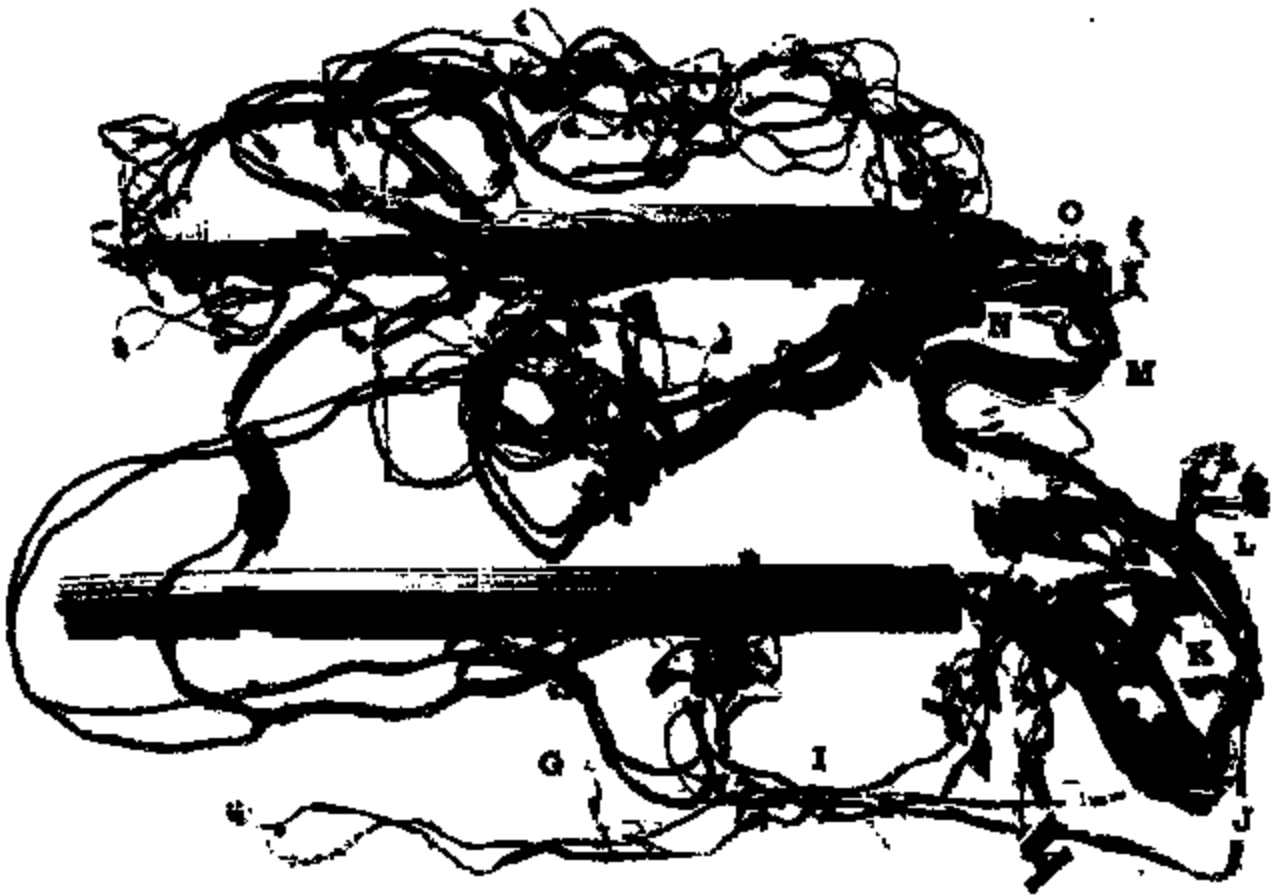
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THE ASSOCIATED BROADCASTERS

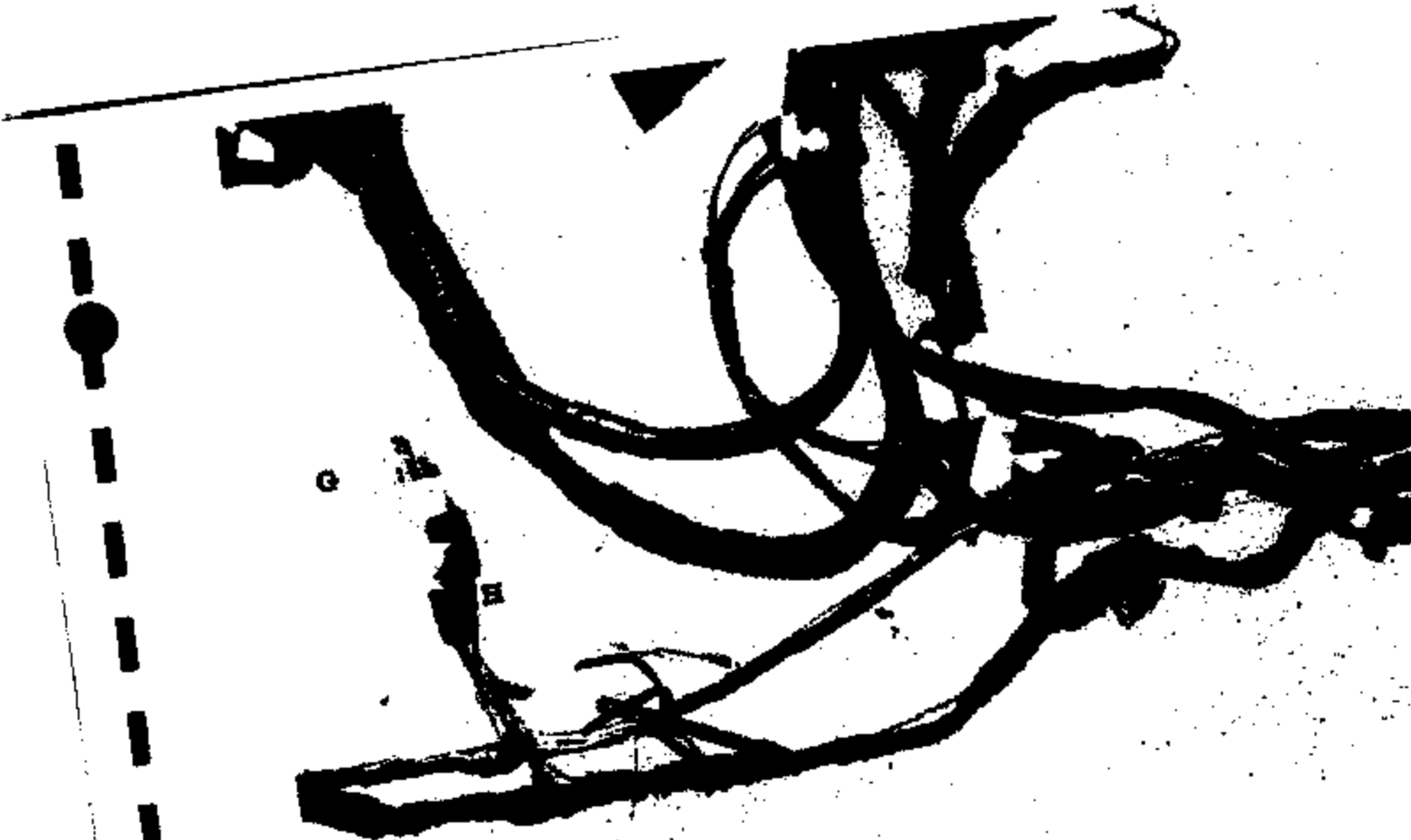




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22



G

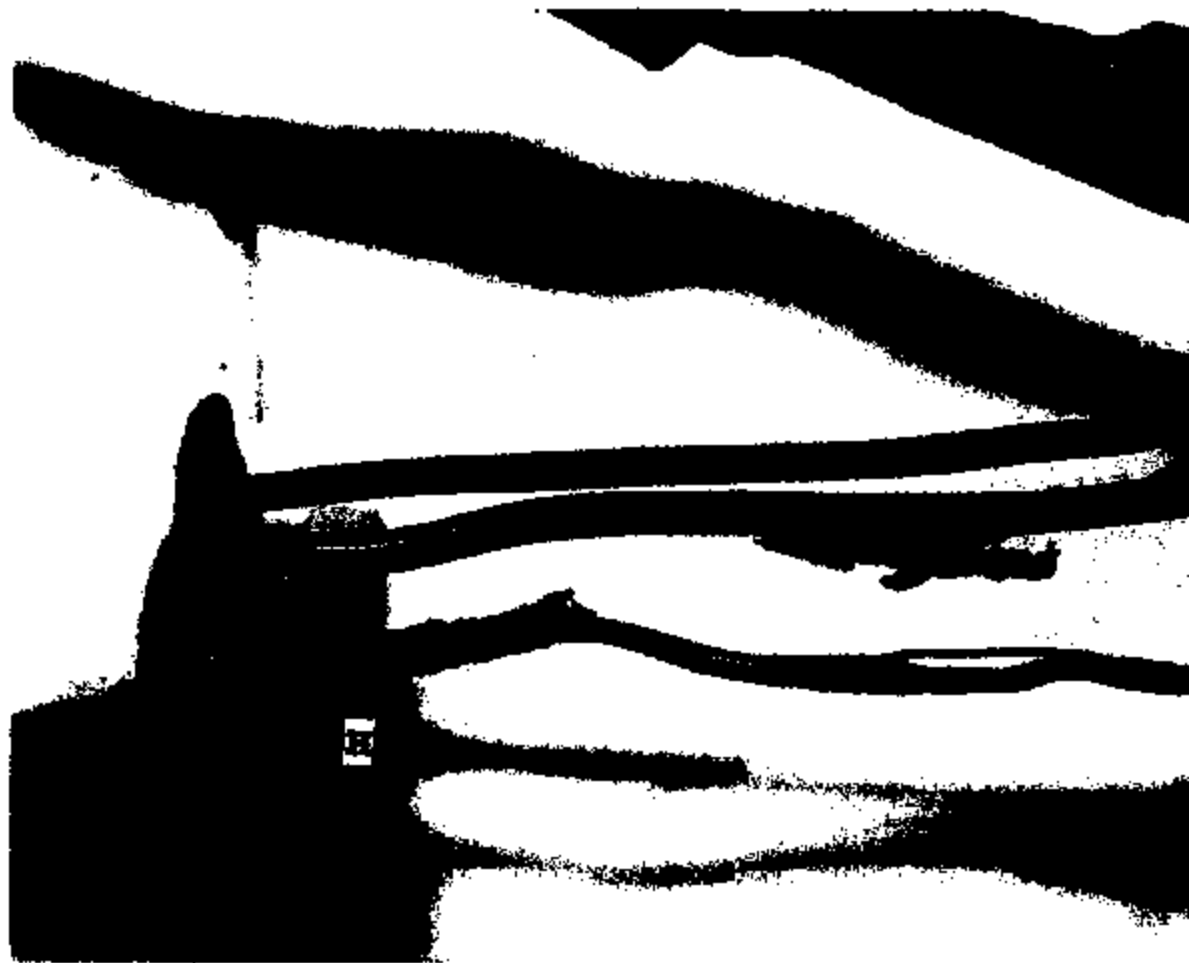
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G

DMC



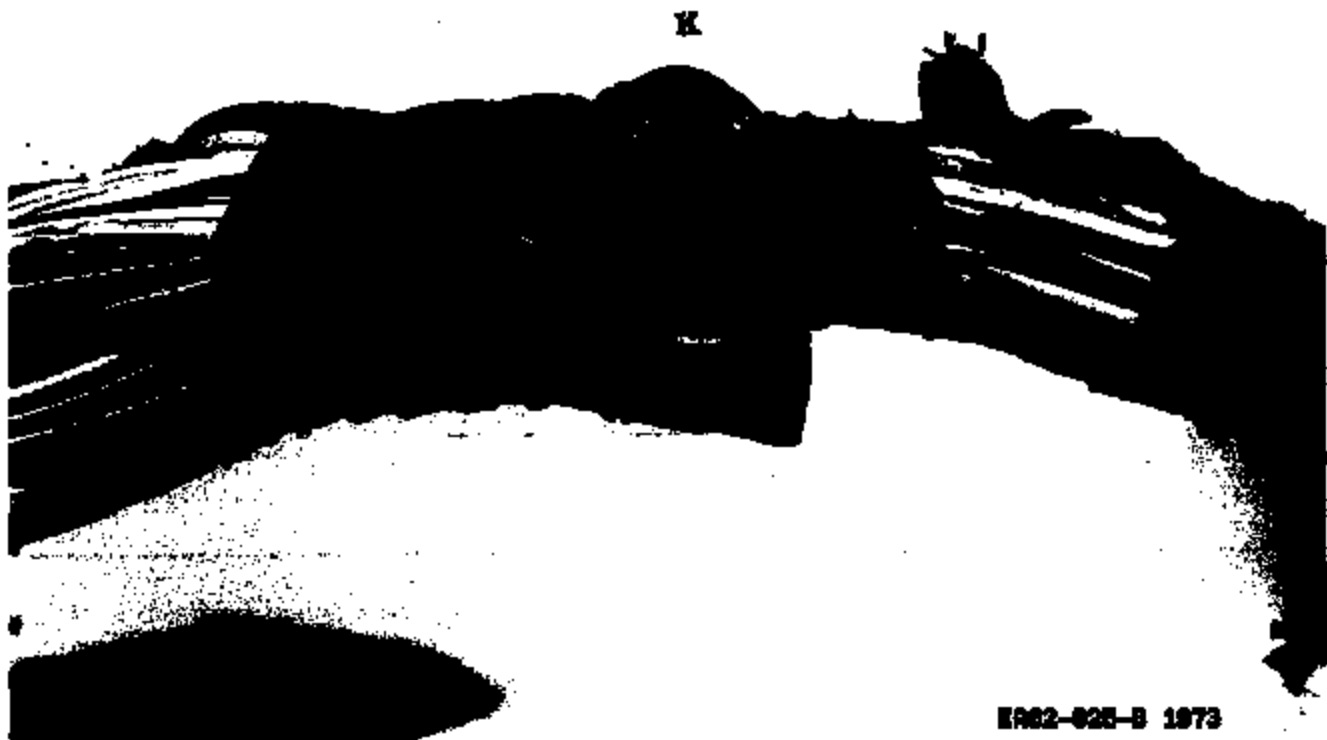
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ER02-025-B 1973

ALL ASSOCIATED METALLOGRAPHY



29



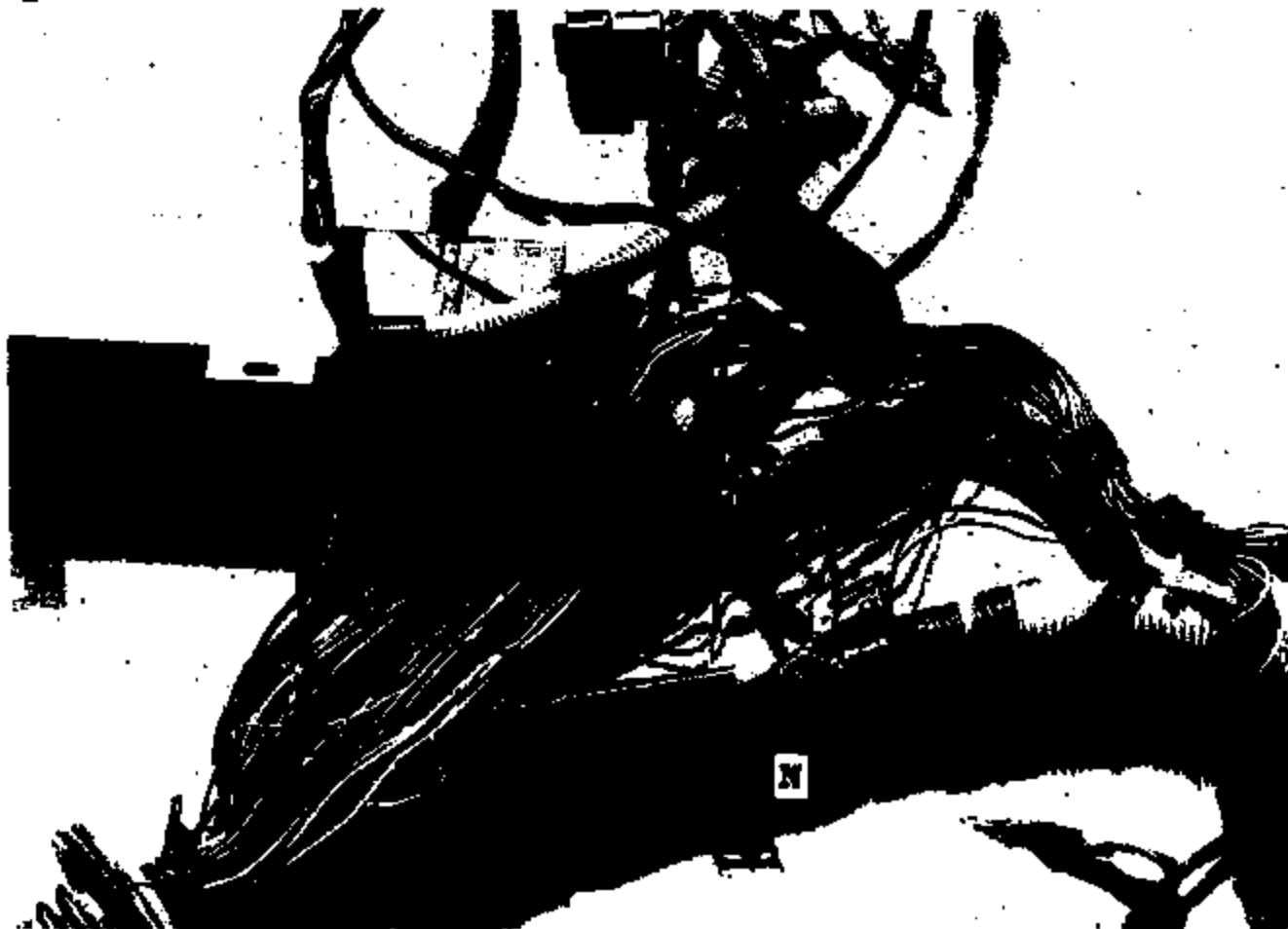
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ER62-025-B 1874





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K992-025-B 1978

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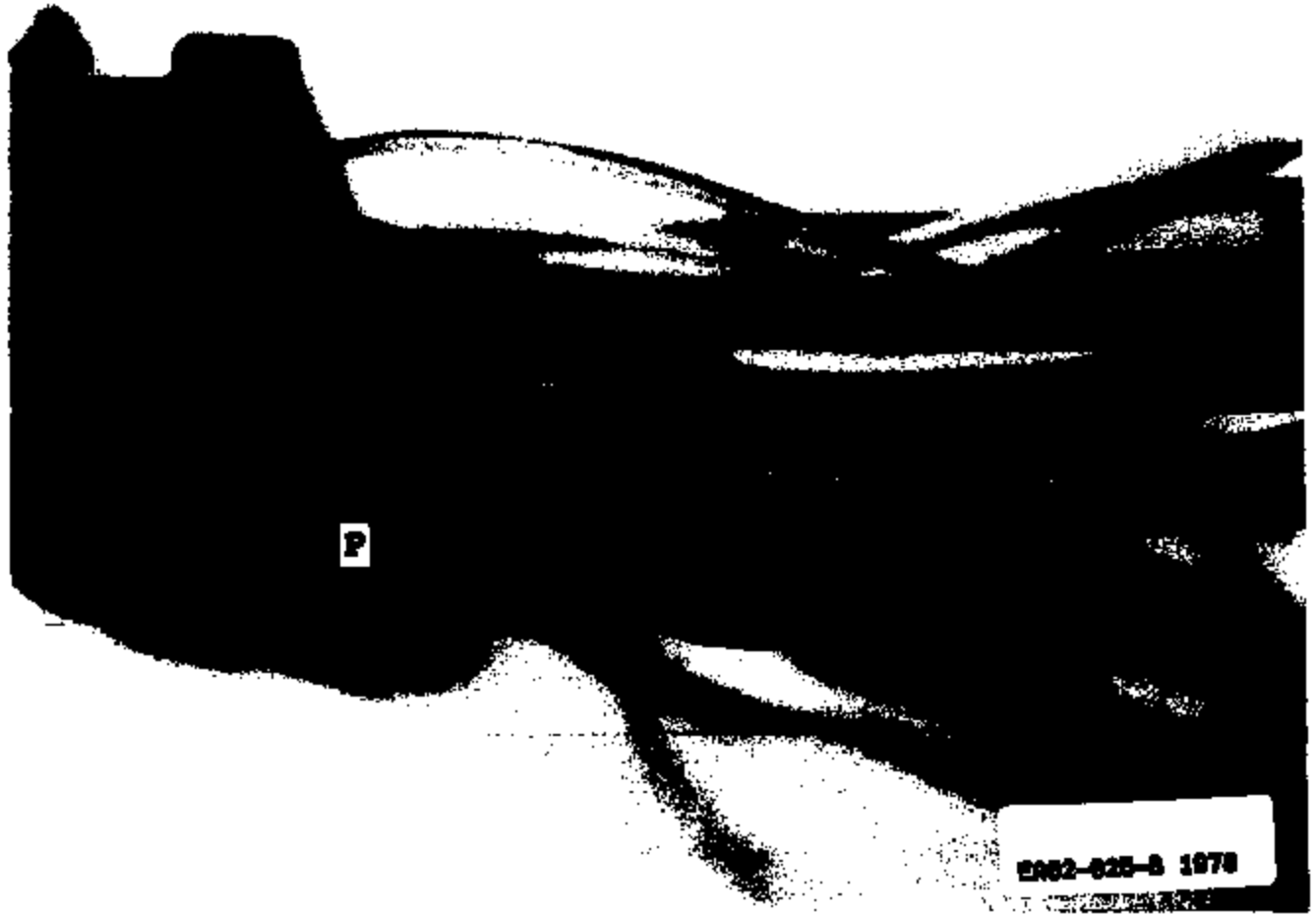
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37



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2002-025-8 1978

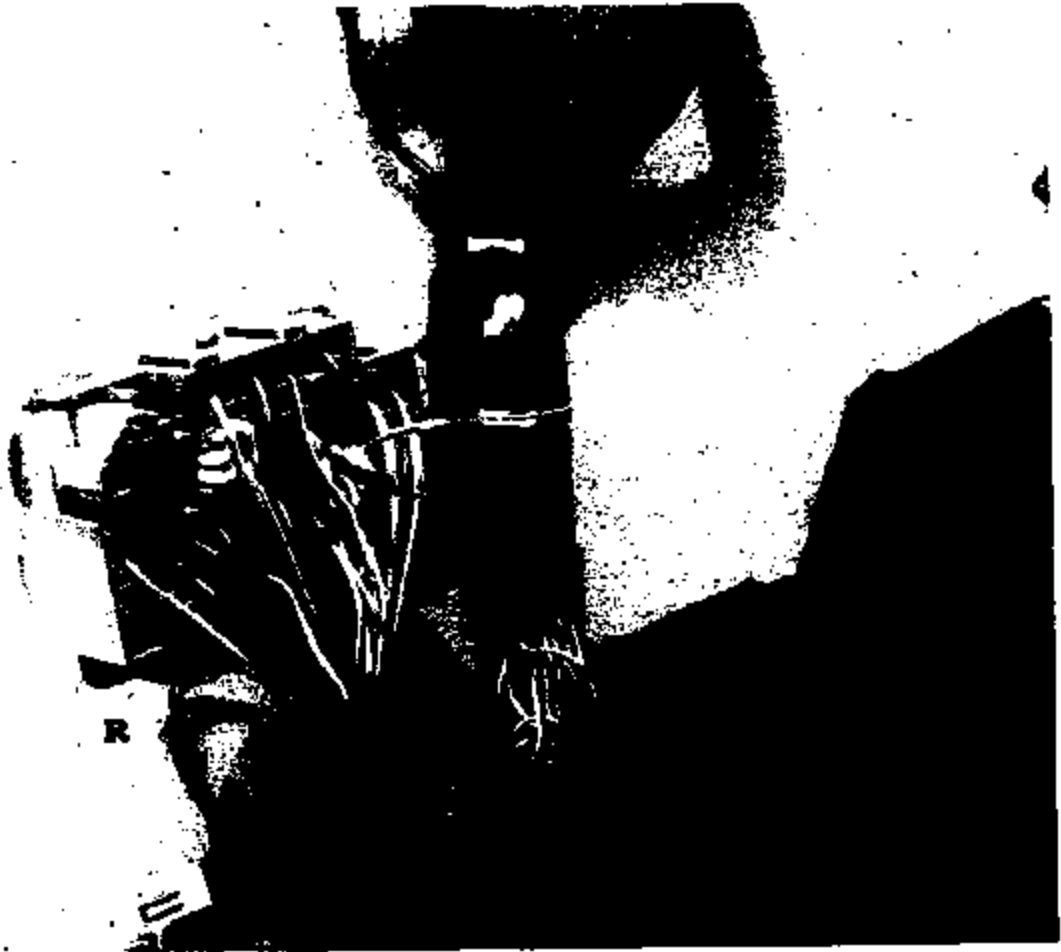


39



ER62-028-B 1978

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41

==>

ENTER VIN ==> 1LNLM82W3HY665153

NAME ==> [REDACTED] ZIP ==> [REDACTED] MODEL YR ==>

OWNER NAME :

STREET ADDR :

CITY : CHICKASHA

N/A YY-MM-DD 96-01-25

ST/PRV: OK CTRY:

ZIP/POSTAL CODE: [REDACTED] N/A SOURCE: P

MODEL YEAR : 95 PLANT: Y

SALE YY-MM-DD 95-01-03

BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES

PRODUCTION YY-MM-DD 94-12-19

VEHICLE DESC : 1995 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	PCSD REGION
SHIP-TO	3	88	A	067	64	CC
FACING	3	51	E	836		
RESPONSIBLE	3	67	E	063		

CA EMISSION : 2

ENGINE TAG CODE : 5GB12BA

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 01

DSO DISTRICT :

FLEET CODE :

OPEN : 00 CLOSED : 01

DSO NUMBER :

FLEET STATUS :

ACTIVE: 01 HISTORY: 00

F1-INQUIRY F3-EXIT F4-G160 F5-G150 F8-CONTINUE SEARCH F9-G130

LPENJ96

ENTER CAMPAIGN NUMBER--> 96112 VIN--> 1LHLM2W38Y665153 TYPE OF SEARCH: A  
 MODEL YEAR: 95 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
 NEW STATUS CODE: CAMP DIV : 5  
 REPAIR INFORMATION: TYPE CODE: SUPP CODE :  
 REPAIR DATE: DEALER P/A: KIT CODE : CK  
 MICRO REF: CLAIM NUM: OASIS DATE :  
 DELETE REASON: VENDOR N/A INFORMATION:  
 RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 4  
 CURRENT: 3 67 063 ASSIGNED: 96-12-13 SOURCE: PK EXTRACT DATE: 96-12-13  
 \*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
 CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
 F FORCED COMPLETION 98-01-22 B 98-01-22 AUTOC OL  
 M RELEASED FOR MAILING 97-02-07  
 H AWAITING MAILING 96-11-24

DELETE REASON:

F1-INQUIRY F2-G140 F3-EXIT F5-G130 F7-FIRST F8-NEXT F9-MORE STATUS  
 F10-ADD STATUS F11-REVISE (ALL DATA FIELD DATES YY-MM-DD)  
 I097-NO MORE DATA TO DISPLAY

LPENJ96

ENTER CAMPAIGN NBR ==> 96L12      VIN ==> 1LN1M82W3BY665153  
 DEFECT : PASS AIR BAG      BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES  
 RESP DEALER : 367063      BEGINNING MAILED DATE: 97-02-21 YY-MM-DD  
 RELEASE DESC : HI PART KIT CODE      ENDING MAILED DATE : 97-02-27 YY-MM-DD  
 CAMPAIGN DIV : 6      FLEET CODE:      FLEET MGMT LOC CODE:  
 LAST NAME :      INITIALS: M  
 STREET ADDR1 :      ST/PRV: OK  
           ADDR2 :      CITY:      CTRY:  
 CITY : CHICKASHA  
 ZIP/POSTAL CODE:      N-A SOURCE: P N-A EFF DATE: 96-01-25 YY-MM-DD  
 \*\*\*\*\*  
 RESP DEALER :      BEGINNING MAILED DATE:      YY-MM-DD  
 RELEASE DESC :      ENDING MAILED DATE :      YY-MM-DD  
 CAMPAIGN DIV :      FLEET CODE:      FLEET MGMT LOC CODE:  
 LAST NAME :      INITIALS:  
 STREET ADDR1 :      ST/PRV:  
           ADDR2 :      CITY:      CTRY:  
 CITY :      N-A SOURCE:      N-A EFF DATE:      YY-MM-DD  
 ZIP/POSTAL CODE:      F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140  
 I848-LAST PAGE      LPEMJ96

SFCHREMA

Recall/ONP Information

09/25/00 10:18:36

VIN: 1LNLM8ZM3SY665153  
WSD: 01/03/95

Year: 1995

Model: TOWN CAR  
Build Date: 12/19/94

A	----- Campaign -----			Status	Dealer	
C	Number	Type	Description	Status	Date	Code
	96L12	L	PASS AIR BAG	FORCED COMPLETION	01/22/98	AUTO

F1=Help F7=Prev F8=Next F11=Menu F12=Return  
NO MORE RECORDS AVAILABLE

OGDB079

# Vehicle Information Report

**GENERAL VEHICLE INFORMATION:**

**(Related Claims)**

VIN: 1J4LM2W3NY661151	Veh Line: C76 - TOWN CAR (FROGFR1) (31-07)	Eng Serial No: *
Model Year: 1995	Market Division: CM - L-M DIVISION DERIVATIVE	Body Style: *
Veh Type: C	Body Code: CB - 2 WHL LCL REAR DRIVE	Engines: C7N - B-M 4.6L SOHC IPE MA CIV6 G-NE
Inv. Dealer: 41346	Body Cab Style: C7C - 4 DOOR SEDAN 4 LITE	Transmission: CDD - 4 SPD AUTO TR NAAD AODR W/ACOW
	Vehicle Series: C86 - SIGNATURE VERSION	

**BUILD INFORMATION:**

Region: NA - FORDNA Region Plant: BA - WOOD PLANT BUILD  
 Country: USA - 48000000 Prod Date: 19-DEC-1994

**SALE INFORMATION:**

Region: NA - 48000000 Selling Dealer: 351836 - \*  
 Country: USA - 48000000 Selling St-OfProv: OK  
 Repor StProv: OK

Arrival Date: 30-DEC-1994 Real Carpet Lease: \*  
 Del Date: 03-JAN-1995 Fleet/Lease/Co. Lease: F  
 Warranty Start Date: 03-JAN-1995 Modified Vehicle: \*  
 Orig Warranty Date: 03-JAN-1995 Recaptured Vehicle: \* Vehicle Export Flag: N

**VOC/DOC:**

-----1-----2-----3-----4-----5-----6-----7-----8-----9-----10-----11-----12-----

REMARKS 1 24120000 C7C 2 C7C 30, 30L 2 351836 OK OK

1995 4 D BA AVEN 41 480000

8000-000-0000



Vehicle Information Report

**INSTALLED OPTION INFORMATION:**

Air Conditioning:	CC - A/C AIR CONDITIONER	GVW Code:	-
Alternator Amp Rating *		GVW Class Code:	L
Audio Radio	* - [N/A]	Entertainment:	* - [N/A]
Axis Ratio:	BEACC - 3.08 FINAL DRIVE RATIO	Mirror(Driver Side):	* - [N/A]
Axis Type:	BEHAB - NON-LIMITED SLIP REAR AXLE	Mirror(Passg Side):	* - [N/A]
Battery Amp Rating:	T2	Paint:	FRSNC - BLUE CURRENT ETC
Brake Code:	* - [N/A]	Power Antenna:	* - [N/A]
Brake Code(Service):	* - [N/A]	Radio:	AQ - ELITE PREMIUM AM/FM STEREO
Calibration Code:	S1CR10A	Ramp System:	* - [N/A]
Color(Account):	* - [N/A]	Rear Tractor Axle:	* - [N/A]
Color(Truck):	00BEC -	Tire Brand:	AJ - MICHELIN TIRE VENDOR - RECYCLEL
Delivery Type:	H	Tire Size:	EXDEF - F25570R15 WSW
Driveshaft Code:	*	Tractor Control:	AB - ANTI-SPIN TRACT BRAKES W/O IVD
Front End:	* - [N/A]	Wheel Base:	* - [N/A]
Fuel Type:	* - [N/A]		

**ESP INFORMATION: EMISSIONS INFORMATION:**

ESP Code:	* Emission Code:	CC - CC
ESP Coverage(Offroad):	* Emission Cert Type:	C
ESP Coverage(Truck):	* Emission Test Method:	LAU
ESP Plan Year:	* Engine Family:	2FM46VEK10K
ESP Signature Date:		

Any comments? You can contact:



2002-02-01 10:00

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 25-SEP-2000

Note: All Costs are in US Dollars

ILNLAZ17930YMS1313VB	CVB	CM	OPC	CHL	CR	BA	CDU	CVN	19-12-94	05-01-95	351806	USA	9	Q58	MT3	*	542082	*	306	V07	L36	33	
AWS Claim Key:	552202	Doc #:	587041	Trx Code:	EM	Labr Hrs:	1	Labr Cost:	47.94	Material Cost:	0	Total Cost:	47.94										
Mr Co-Sub Cn:	4245	Name:	HERTZ RAC - LOS ANGELES	Plc:	0	St CA:	Chy Cn:	USA	Reg Cn:	NA	Reg Date:	17-SEP-1995	INST(Inst):	19021									
ILNLAZ17930YMS1313VB	CVB	CM	OPC	CHL	CR	BA	CDU	CVN	19-12-94	05-01-95	351806	USA	19	Q17	W12	PIVY	1908	A	312	V79	CR5	28	
AWS Claim Key:	107550	Doc #:	6230001	Trx Code:	MS	Labr Hrs:	7	Labr Cost:	38.21	Material Cost:	265.46	Total Cost:	303.67										
Mr Co-Sub Cn:	0875	Name:	CHARLES ALLEN FORD L-14, INC.	Plc:	4	St OK:	Chy Cn:	USA	Reg Cn:	NA	Reg Date:	13-JUL-1996	INST(Inst):	41269									
Chf Comments:	AC INOP AT TIMES																						
Tech Comments:	CK AUTO AC SYSTEM REPLACE CONTROL HEAD INOP AT TIMES																						

Any comments? You can contact



webmaster

## Claim Detail Report

Note: All costs are in US dollars

Model Year = 1995; Claim Key = 4642387

### Vehicle Information

Model Year: 1995  
 Market Derived: C/M - L-M DIVISION DERIVATIVE  
 Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LITE  
 Version/Series: C/BR-SIGNATURE VERSION  
 Drive Type: C/B-2 WHL L/H REAR DRIVE  
 Vehicle Line: C/VB-TOWN CAR (FNG6/FN116) [91-97]  
 Warranty Start Date: 03-JAN-1995  
 Production Date: 19-DEC-1994  
 VIN: ILNLMR2W3SY665153

### Claim Information

Document Number: 5619241  
 Repair Date: 17-SEP-1995  
 Distance: 19422  
 TIS: 9

### Dealer Information:

Dealer Name: HERTZ RAC - LOS ANGELES  
 Dealer Code: 45245 - \*  
 Address: 9000 AIRPORT BLVD  
 City: LOS ANGELES  
 State: CA Zip Code: 90045  
 Country: USA Region Code: NA  
 Phone: (\*)\*-

### Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 47.94  
 Misc. Expense Amount: 0  
 Part Markup Amount: 0  
 Material Cost: 0  
 Total Cost Gross: 47.94

Cost Concern Code: L16 - INT. DOOR LOCK CONTROLS - MANUAL

Condition Code: 33 - LOOSE

Technician Comment:

Customer Comment:

Claim Detail

Labor Op Code	Labor Op Description	Labor Op Cost
23942B	TRIM PANEL-FRONT DOOR REMOVE AND INSTALL	38.35
23942B2	LOCK ROD/LOCK ROD CLIP REMOVE AND INSTALL	9.59

Cancel	Full Part Number	Part Description	Part	CPSC	Quantity	Extended Amount
Y	* 5421852 *	RD DR L4 PSH BTN R	011404	0	0	0

Any comments? You can contact



webmaster

0007 0-000-0007

# Claim Detail Report

*Note: All costs are in US dollars*

Model Year = 1995; Claim Key = 10914888

## Vehicle Information

Model Year: 1995  
 Market Derived: C/M - L-M DIVISION DERIVATIVE  
 Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LITE  
 Version/Series: C/BR-SIGNATURE VERSION  
 Drive Type: C/B-2 WHL L/H REAR DRIVE  
 Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]  
 Warranty Start Date: 03-JAN-1995  
 Production Date: 19-DEC-1994  
 VIN: 1LNLMR2W3SY665153

## Dealer Information:

Dealer Name: CHARLES ALLEN FORD L-M, INC.  
 Dealer Code: 06875 - \*  
 Address: 1717 S FOURTH ST  
 City: CHICKASHA  
 State: OK Zip Code: 73018  
 Country: USA Region Code: NA  
 Phone: (405)224-2000

## Claim Information

Document Number: 02336801  
 Repair Date: 12-JUL-1996  
 Distance: 41269  
 TIS: 19

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 30.81  
 Misc. Expense Amount: 0  
 Part Markup Amount: 98.18  
 Material Cost: 245.46  
 Total Cost Gross: 374.45

Cust. Concern Code: C05 - A/C DOES NOT WORK

Condition Code: 28 - OPEN CIRCUIT

Technician Comment: CK AUTO AC SYSTEM REPLACE CONTROL HEAD INOP AT TIMES

Customer Comment: AC INOP AT TIMES

1995-02-14 10:00

Claim Detail

<u>Labor Op Code</u>	<u>Labor Op Description</u>	<u>Labor Op Cost</u>
19700D	AUTOMATIC TEMPERATURE CONTROL (ATC) DIAGNOSIS	22.01
19700D16	CONTROL ASSEMBLY - AIR CONDITIONER REPLACE	8.8

---

<u>Case#</u>	<u>Full Part Number</u>	<u>Part</u>	<u>Part</u>	<u>Extended</u>			
<u>Flag</u>	<u>PREF</u>	<u>BASE</u>	<u>SUFF</u>	<u>Description</u>	<u>CPSC</u>	<u>Quantity</u>	<u>Amount</u>
Y	FSVY	19980	A	CONTROL A/C 120308	1	245.46	

---

Any comments? You can contact



[webmaster](#)

ENR-028-1 1001

Ford

Office of the General Counsel

Ford Motor Company  
3 Perkinse Boulevard  
Fordakin Towers West, Suite 400  
Dearborn, Michigan 48122-2998

January 18, 2001

State Farm Insurance Company  
P.O. Box 720800  
Norman, OK 73070-4700  
**ATTENTION: KAY LAUDERDALE**

Re: Claimant: [REDACTED]  
D/L: July 22, 2000  
Y/Claim #: 86-A182-807

Dear Ms. Lauderdale:

The above referenced claim has been reviewed and evaluated. We believe the Economic Loss Doctrine would prohibit you from any recovery under these circumstances. Therefore, we must respectfully deny liability for this claim.

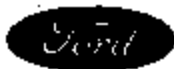
Please be advised if you are going to pursue this claim, we assume you will comply with your duty to preserve the evidence and such duty does not expire until any possible litigation is complete. All necessary steps must be taken to ensure that the subject vehicle and all of its component parts are maintained and preserved for trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

Cordially,



Allan Robinson  
Litigation Assistant

jas



Office of the General Counsel

Ford Motor Company  
3 Parklane Boulevard  
Parklane Towers West, Suite 300  
Dearborn, Michigan 48126-5500

April 19, 2001

Safeco Property & Casualty Insurance  
St. Louis Region  
1816 N. Hwy Dr.  
Fenton, MO 63099

**ATTENTION: Laura M. Manyx**

Re: Claimant: [REDACTED]  
D/O/E: 11/27/00  
Vehicle: 1994 Lincoln Town Car  
Your Claim #: 05a00332868

Dear Ms. Manyx:

Following a review of the facts and circumstances surrounding this event, Ford Motor Company finds no evidence of a manufacturing or design defect; therefore, we must deny liability for this claim. Additionally, we believe that the Economic Loss Doctrine would prohibit you from any recovery under these circumstances.

Please be advised that all necessary steps must be taken to ensure that the subject vehicle and all of its component parts are maintained and preserved in the event you elect to litigate this matter. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

If you propose to repair the vehicle for continued usage, such repairs may not be performed until after Ford Motor Company has inspected the vehicle and removed and tested any component part you claim to be defective or advised you in writing that it does not intend to perform such inspection and/or testing at this time. But even in that event, Ford Motor Company will insist that all components claimed to be defective are maintained and preserved for trial.

Sincerely,

Shawn Norton  
Claims Analyst

1992-825-8 2547



**SAFECO PROPERTY & CASUALTY INSURANCE COMPANIES**

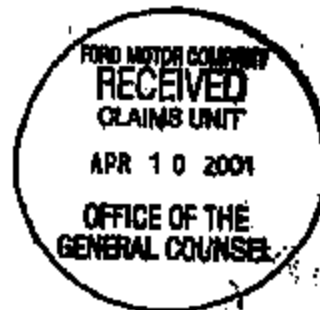
St. Louis Region  
1318 N. Hwy Dr.  
Penton, MO 63199

Phone: (314)909-5398

Mailing Address:  
PO Box 481  
St. Louis, MO 63166-0481

April 4, 2001

Ford Motor Co.  
Office of the General Counsel  
Parklane Towers West, Suite 300  
Three Parklane Blvd.  
Dearborn, MI 48126



Our Insured: [REDACTED]  
Our Claim #: 05a003329868  
Date of Loss: 11/27/00

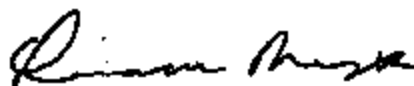
**Ladies & Gentlemen:**

Attached please find the documents supporting our insured's vehicle damage claim totaling \$8,085.00, which includes our insured's \$100.00 deductible. The fire in our insured's 1994 Lincoln Town Car resulted from a failure of the deactivation switch, which has been addressed in Ford's 1999 Safety Recall Campaign # 99815.

We are currently storing the vehicle at Copart Salvage in Florence, MS, in the event that you would care to have it inspected by your own experts. Please contact me to discuss your intentions further.

Thank you for your assistance.

Sincerely,

  
Laura M. Manix  
Recovery Management Specialist  
(314) 909-5399  
Fax: (877) 215-6955  
E-mail: [lanman@safeco.com](mailto:lanman@safeco.com)

**REDACTED**

EA82-028-5 2548 77

DEMOGRAPHIC INFORMATION	
Year	1993
City	Lincoln
State	MS
County	Chickasaw
Address	Bay St. Louis
Zip	39320
Phone	( )
Occupation	
Age	
Sex	
Religion	
Marital Status	
Education	
Employer	
Vehicle	1993 Lincoln Town Car

**WATERS**

Arrived on scene at [redacted] around 1993 Lincoln Town Car under carport with short front end engine compartment involved with fire. FF. Noyse and Lewis extend #1 jump line and began to extinguish fire. They used a Halogen tool to open the engine compartment and extinguish fire in engine compartment. Once fire was extinguished E-1 cut and push vehicle floor under carport. Cut positive battery terminal and made sure no fire had extended to carport.

RDA

**ADDITIONAL PERSONNEL**

[Redacted area]

**CREW MEMBER COMMENTS**

Lt. Ronald Avery

Lt. Ronald Avery

W/03/00

**DIAGRAM**

[Redacted area]

**EQUIPMENT USED**

E-1

#1 Jump line

2 sc BA

1 Halogen Tool

**FIRE CAUSE**

**FOR**

**SAFECO INSURANCE COMPANY  
1030 NORTHPARK DR., SUITE, B  
RIDGELAND, MS 39157**

**OF**

**VEHICLE FIRE  
1994 LINCOLN TOWN CAR**

**[REDACTED]  
BAY ST. LOUIS, MS**

**BY**

**JAMES VICKERS, DBA  
FIRE LOSS SERVICES  
215 INDUSTRIAL COVE  
RIDGELAND, MS 39157**

**CASE [REDACTED]  
CLAIM [REDACTED]  
JANUARY 15, 2001**

**REDACTED**

**ER82-828-B 2888 (7)**

**CONTENTS**

	<b>PAGE NO.</b>
<b>CONCLUSION:</b>	<b>1</b>
<b>PHOTOGRAPH LOG:</b>	<b>3</b>
<b>PHOTOGRAPH PLACEMENT:</b>	<b>4</b>
<b>STEVE MILLER REPORT:</b>	<b>13</b>

**JAMES VICKERS, DBA  
FIRE LOSS SERVICES  
215 INDUSTRIAL COVE  
RIDGELAND, MISSISSIPPI 39157  
TELEPHONE (601) 856-6983**

January 31, 2001

Client: Safeco Insurance Co.  
1030 Northpark Dr., Suite B  
Ridgeland, MS 39157

re: Vehicle Fire  
1994 Lincoln Towncar  
[REDACTED]  
Bay St. Louis, MS

Attn: Mr. Dave Perkins

Case [REDACTED]  
Claim [REDACTED]

---

**VEHICLE INSPECTION/CONCLUSION**

---

On January 15, 2001, at the request of Ms. Shirlee Barrett, Mr. Steve Miller, an ASE Certified Auto Technician and I examined the referenced loss at CoPart Salvage, in Florence, Mississippi, under Stock #7160620. Information given indicated the loss occurred November 27, 2000, at 2:44 p.m., while parked under the insured's carport.

An examination revealed a very localized area of burning, at the left fender and left rear of the motor compartment. There was no evidence of extension of the fire into the passenger compartment. A closer examination of the motor compartment revealed the origin of the fire was around the left rear, below the master cylinder and brake booster. This is in the general vicinity of the deactivation switch for the speed control. The fire spread up to the wiring harness, fuel lines and brake master cylinder. Although there was some spread of fire into the remaining part of the motor compartment, this was minimal.

**REDACTED**

6882-025-B 2552 M 1

Safeco Insurance Company  
Case #11-01

January 31, 2001

Conclusion  
Page 2

CONCLUSION

Based on my examination of the loss, and considering the information given, and the report of Mr. Steve Miller, that is attached, it is my opinion the referenced fire was accidental, with an origin in and around the left rear of the motor compartment, at the speed control deactivation switch. The more probable cause is the failure of the deactivation switch, as outlined in Mr. Miller's report.

Respectfully submitted,

*James Vickers*  
JAMES VICKERS  
CERTIFIED FIRE INVESTIGATOR

/pv

REDACTED

ERR2-825-3 2993 m

EXPERT RPT.

2

**JAMES VICKERS, DBA  
FIRE LOSS SERVICES  
215 INDUSTRIAL COVE  
RIDGELAND, MISSISSIPPI 39157  
TELEPHONE (601) 256-6903**

January 15, 2001

Case [REDACTED]  
CLAIM [REDACTED]

PHOTOGRAPH LOG

PHOTO #	LOCATION AND/OR OBJECT
1 & 2	Show the burned vehicle, looking at the front, left side, rear and right side, respectively.
3	Shows a close-up of the localized burning to the left fender and left rear hood.
4	Shows the motor compartment, with the hood raised.
5 & 6	Show the motor compartment, looking from the left side, with a close-up of the burned air intake hose, and a control module.
7	Shows the burned conditions along the left fender well, looking to the rear.
8	Shows the burned-off fuel lines, previously shown in the left of photo 7.
9	Shows the burned conditions to the wiring harness and wheel well lining around the left rear of the motor compartment.
10	Shows a close-up of the top of the cruise control deactivation switch.
11 & 12	Show closer views of the burned conditions around the left rear of the motor compartment, and the cruise control deactivation switch.
13	Shows the motor compartment, looking from the right side.
14	Shows the identification tag and VIN.
15 & 16	Show the conditions of the interior, looking through the open front left and right doors, around the dash, and front seat area.
17	Shows the interior fuse panel.

CASE # [REDACTED]

PHOTO # \_\_\_\_\_



X

PHOTO # \_\_\_\_\_



X

SP2-625-B 2005



CASE # [REDACTED]

PHOTO # \_\_\_\_\_

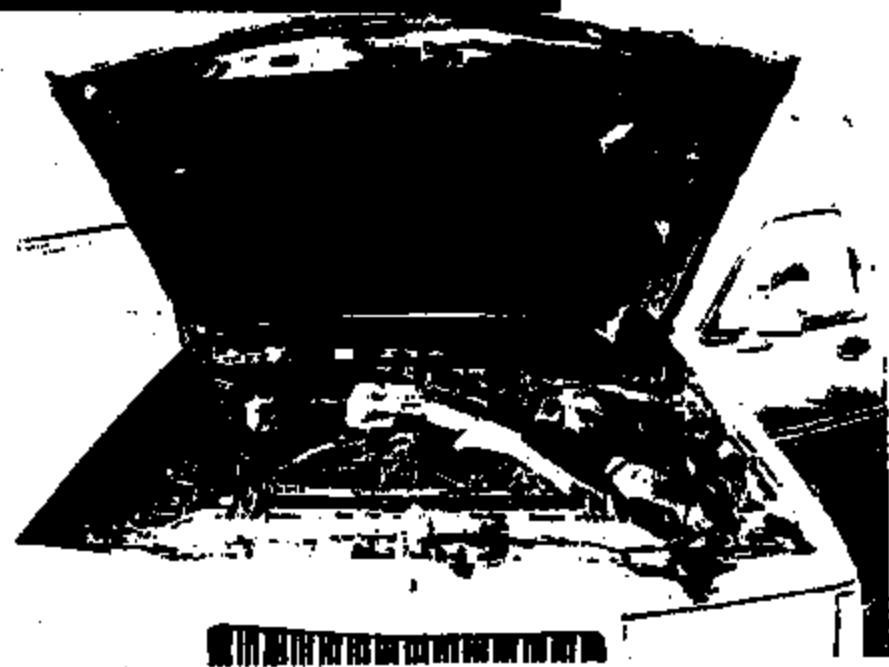
X



X

PHOTO # 4 \_\_\_\_\_

X



X

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

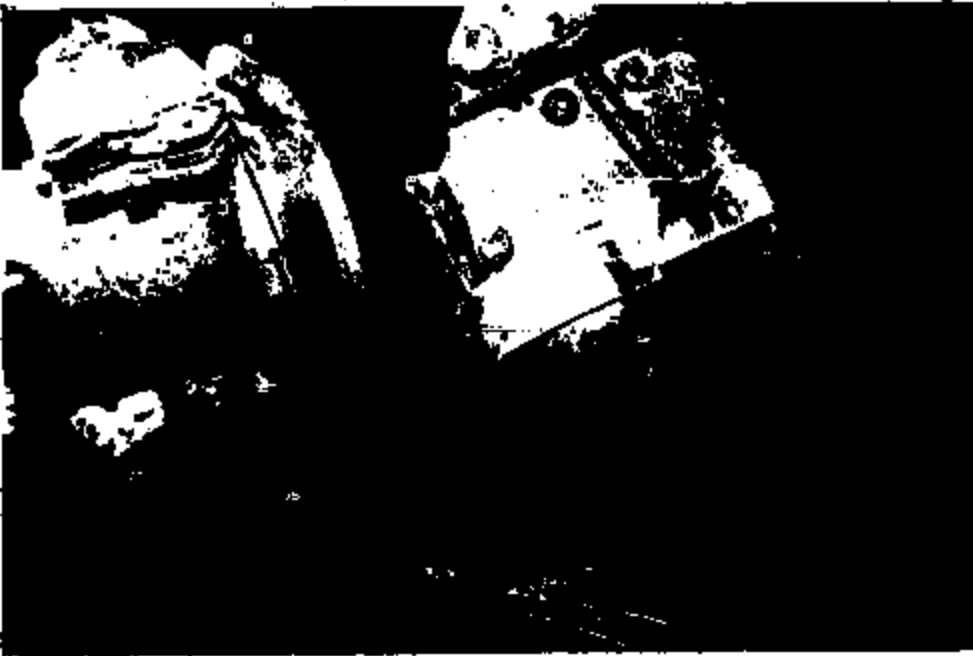
5

CASE # [REDACTED]

PHOTO # 5



PHOTO # 6



LA02-025-B 2587

CASE # [REDACTED]

PHOTO # 7

X



X

PHOTO # 8

X



7

CASE # [REDACTED]

PHOTO # 9

X



X

PHOTO # 10

X

9902-028-8 2888

8

CASE # [REDACTED]

PHOTO # 11



PHOTO # 12



9

HR02-020-B 2000

CASE # [REDACTED]

PHOTO # 13

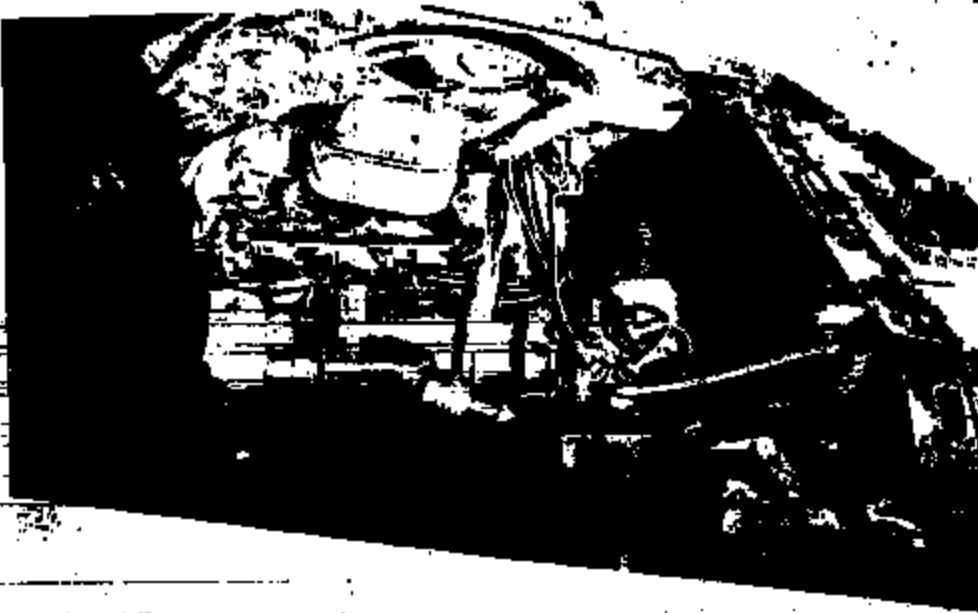
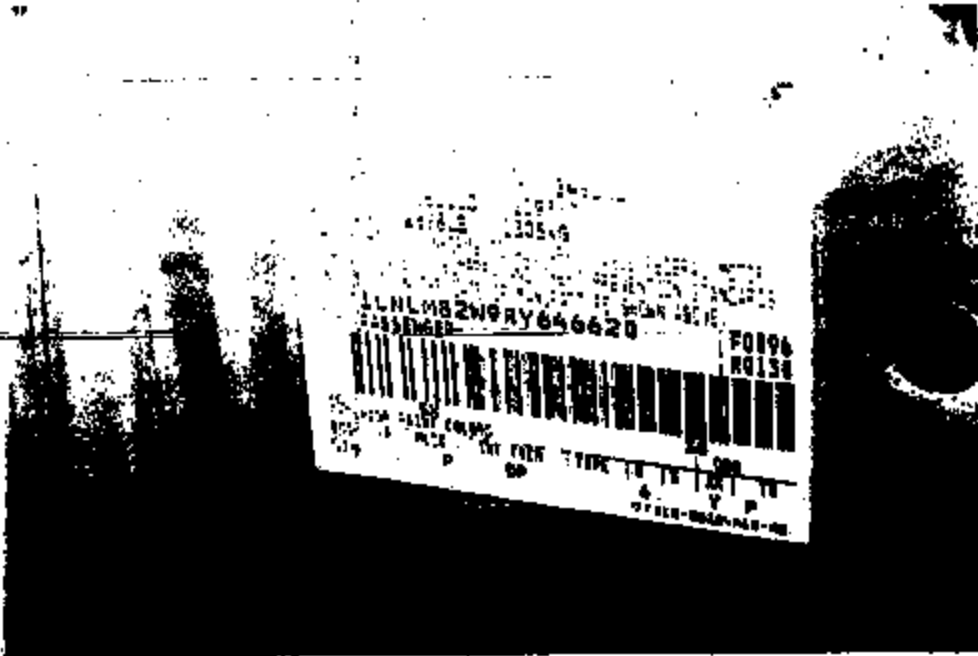


PHOTO # 14

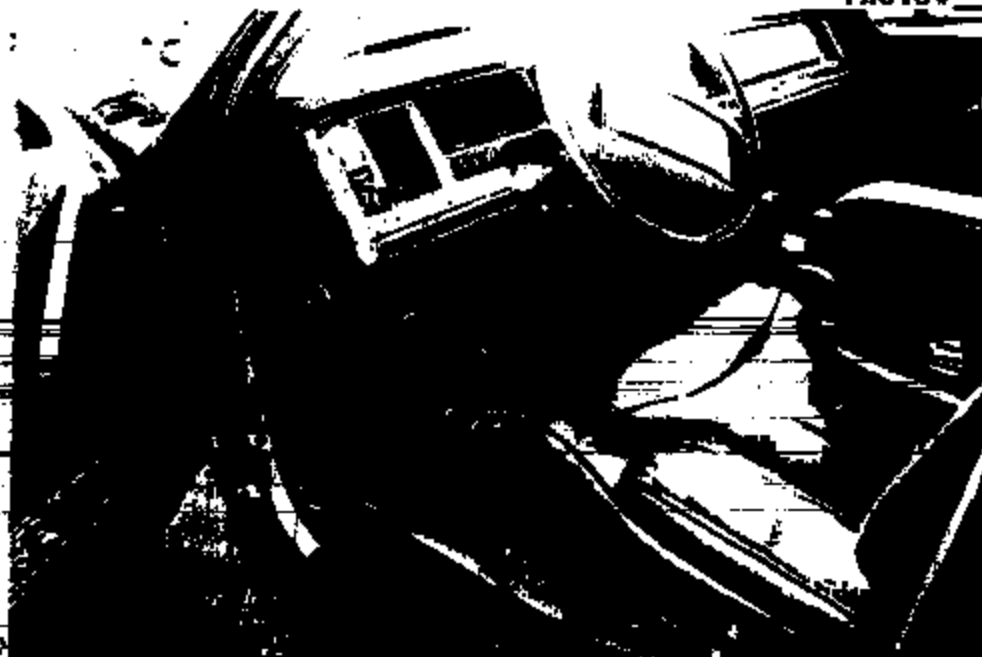


10

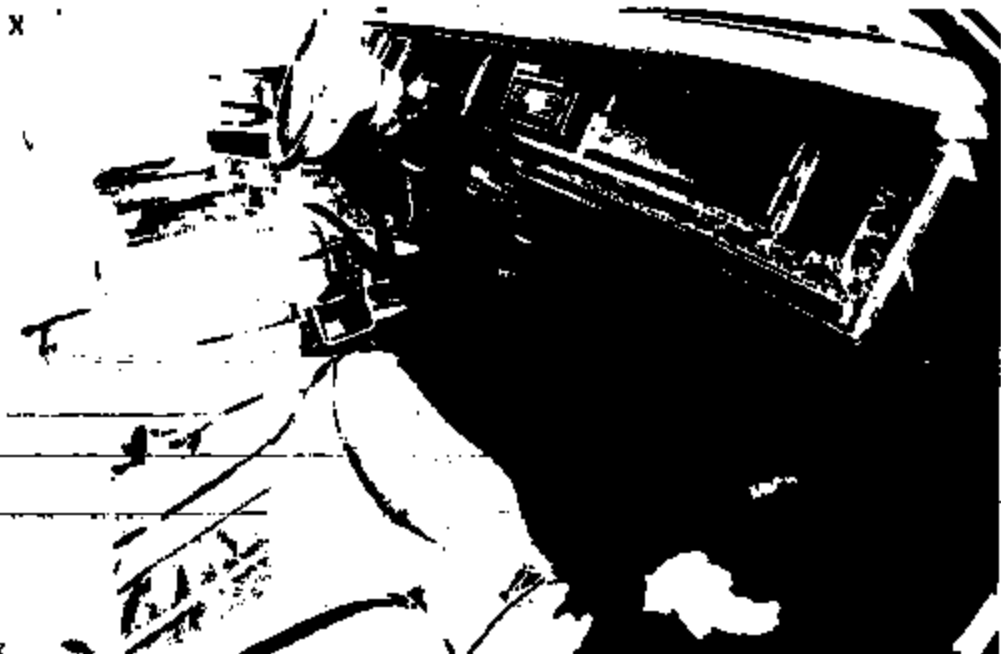
CASE#

PHOTO#

15



PHOTO# 16



ER82-825-B 2562

CASE #

PHOTO #

17



PHOTO #

X

X

X

X

ENC-625-B 2553

12



## VEHICLE INSPECTION REPORT

DATE OF INSPECTION: 01/15/01

DATE OF LOSS: 11/27/00

INSURED: [REDACTED]

PHONE: [REDACTED]

INSURANCE: Safe Co Insurance

CLAIM NUMBER: [REDACTED]

INSPECTED FOR: James Vickers

CASE: ELS-11-01

MAKE: Lincoln

MODEL: Town Car

YEAR: 1994

VIN: 1LNLM62W9RY616520

PLACE OF INSPECTION: COPARTS

STOCK#: 7160620

REASON FOR INSPECTION: Determine cause and origin of fire loss.

FINDINGS: Fire originated in the left rear section of the engine compartment below the master cylinder. This is the location of the Speed Control Deactivation Switch. This switch is used to disengage the cruise control by taking power away from the Speed Control Amplifier. This circuit is a hot all time circuit. This circuit is protected by a 15 amp fuse located in the #12 position of the Instrument Panel (I/P) fuse panel.

During inspection of the I/P fuse panel the 15 amp fuse located in the #12 position which protects the Stop/Hazard Lamp, Brake Shift Interlock, Speed Control was found open.

In 1999 Ford Motor Company issued a Safety Recall, Mfg. Campaign #: 99S15, concerning a problem that could result in fire originating in the left front underhood area. The recall stated that the Speed Control Deactivation Switch could develop a relative short in the electrical circuit that could potentially result in an

underhood fire. This fire could result when the vehicle was running or when the vehicle engine is off.

This vehicle, because of year, is not mentioned in this recall, but the conditions and results are identical to those mentioned in the recall.

~~CONCLUSION: Excessive heating at the Speed Control Deactivation Switch resulted in a underhood fire.~~

Steve Miller  
ASE Certified Master  
Auto & H-D Truck Technician

DATE: 01/27/01

*Ford Motor Company*

Office of the General Counsel

Ford Motor Company  
Parsons Towers West  
Suite 304  
Three Parklane Boulevard  
Dearborn, Michigan 48120-2652

March 28, 2001

Kenneth Fulgenzi, Esq.  
National Casualty Company  
Claims Division  
P.O. Box 4120  
Scottsdale, AZ 85261-4120

Re: Claimant: [REDACTED]  
Claim #: 691249-452

Dear Mr. Fulgenzi:

Please be advised that the vehicle involved in this claim was not subject to recall 99S16, as it was built prior to the date of the vehicles affected by this recall. At the present time, given what information we have received, it appears that there is no evidence of a manufacturing or design defect.

Until a claimant proves a manufacturer's defect, Ford Motor Company will not consider their claim valid. The primary evidence in any product liability claim or lawsuit is that which shows the product, or any component part is in fact defective.

Unless we are provided with such evidence we will have no alternative but to deny responsibility for this claim.

Please be advised that all necessary steps should be taken to ensure that the subject vehicle and all component parts are maintained and preserved for trial. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be present with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

If you propose to repair the vehicle for continued usage, such repairs may not be performed until after Ford Motor Company has inspected the vehicle and removed and tested any component part you claim to be defective or advised you in writing that it does not intend to perform such inspection and/or testing at this time. But even in that event, Ford Motor Company will insist that all components claimed to be defective are maintained and preserved for trial.

Sincerely,

*Julie MacGillis*

Julie MacGillis  
Claims Analyst

## AFFIDAVIT OF VEHICLE FIRE

All questions must be answered, or this affidavit may be rejected

## SECTION I

CLAIM NUMBER: [REDACTED] POLICY NUMBER: [REDACTED]  
 NAME OF INSURED: [REDACTED]  
 ADDRESS: [REDACTED] West Chester, PA  
 HOME PHONE NO.: [REDACTED] DATE OF BIRTH: [REDACTED]  
 DRIVER'S LICENSE NO.: [REDACTED] SOCIAL SECURITY NO.: [REDACTED]  
 MARITAL STATUS: M NO. OF DEPENDENTS: 4  
 IF MARRIED, SPOUSE'S FULL NAME: [REDACTED]  
 NAME AND ADDRESS OF EMPLOYER: [REDACTED] King of Prussia, PA  
 BUS. PHONE NO.: [REDACTED] OCCUPATION: Executive  
 CURRENT SALARY: [REDACTED] LENGTH OF TIME IN PRESENT EMPLOYMENT: Always

## SECTION II

DATE OF FIRE: 9/10/00 TIME: 5:25 AM DAY OF WEEK: Sunday  
 WHEN WAS FIRE REPORTED TO FIRE DEPARTMENT: 5:25 AM  
 LOCATION OF FIRE DEPARTMENT: Malvern, PA.  
 WHO REPORTED FIRE: [REDACTED] both called in separately  
 WERE YOU CARRYING ANY FLAMMABLE LIQUIDS IN VEHICLE (SPARE GAS CAN, STARTER FLUID, UPHOLSTERY CLEANERS, ETC.) IF YES PLEASE LIST, INCLUDING SIZE OF CONTAINERS: NO

AMOUNT FOR WHICH YOU ARE MAKING A CLAIM: Fair market value

## SECTION III

YEAR OF VEHICLE: '92 MAKE: Ford Mercury MODEL: Grand Marquis  
 BODY TYPE: Sedan COLOR: dark blue  
 VEHICLE IDENTIFICATION NO.: 2MECM75W5NXL15853  
 LICENSE PLATE NO.: [REDACTED] STATE: PA  
 ENGINE TYPE: V-8 GAS OR DIESEL: GAS HJ. OR CLINCH: UNK  
 ODOMETER READING (AT TIME OF FIRE): 25176

FBI/DOJ - 2000

10/20/2000 FRI 07:09 [TX/RX NO 0055] 0002

WHO PERFORMS STATE INSPECTIONS: Main Line Tire and Service Inc.  
 NAME AND ADDRESS OF SERVICE STATION/GARAGE: 87 E. Lancaster Ave.  
Peoli, PA 19301  
 DATE LAST SERVICED: 8/22/00 DATE LAST INSPECTED: 8/23/00

**SECTION IV. - A** COMPLETE THIS SECTION ONLY IF VEHICLE WAS BEING DRIVEN AT TIME OF FIRE

WHERE WAS THE VEHICLE BEING DRIVEN TO? Driving home from airport.  
 FOR WHAT REASON? Picking up package at airport.  
 NAME AND ADDRESS OF DRIVER: [REDACTED], West Chester, PA.

DID YOU SMELL SMOKE OR SEE FLAMES FIRST? I smelled something burning.  
 WHERE DID THE FIRE APPEAR TO START? Under left front portion of hood, near the  
left front tire.  
 DID YOU HEAR ANY UNUSUAL NOISES OR NOTICE ANY ELECTRICAL OR MECHANICAL MALFUNCTIONS? NO  
 YES, PLEASE DESCRIBE: NO noises, no warning lights. Car wasn't handling road  
as well. Noticed slight  
 WHAT WAS THE COLOR OF THE SMOKE? Clear and white initially yellow difference in  
acceleration.

**SECTION IV. - B** COMPLETE THIS SECTION ONLY IF VEHICLE WAS PARKED AND UNATTENDED AT TIME OF FIRE

SPECIFIC LOCATION WHERE VEHICLE WAS LEFT: NA  
 REASON FOR BEING IN THIS LOCATION: NA  
 NAME AND ADDRESS OF PERSON WHO LEFT VEHICLE AT THIS LOCATION: NA  
 WAS VEH. LOCKED? NA WERE KEYS LEFT IN VEHICLE? NA WINDOWS ROLLED UP? NA  
 WHEN DID YOU FIRST LEARN OF FIRE? NA  
 DO YOU SUSPECT ANYONE OF SETTING FIRE TO YOUR VEHICLE? NA  
 IF SO, WHO (INCLUDE ADDRESS IF KNOWN): NA  
 WAS THIS INFORMATION GIVEN TO THE POLICE? NA

1982-025-B 2500

FROM

SECTION V.

VEHICLE CONDITION:

PAINT	POOR _____	FAIR _____	GOOD _____	EXCELLENT <input checked="" type="checkbox"/>
TRANSMISSION	POOR _____	FAIR _____	GOOD _____	EXCELLENT <input checked="" type="checkbox"/>
ENGINE	POOR _____	FAIR _____	GOOD _____	EXCELLENT <input checked="" type="checkbox"/>
BODY	POOR _____	FAIR _____	GOOD <input checked="" type="checkbox"/>	EXCELLENT <input checked="" type="checkbox"/>

OTHER DISTINGUISHING FEATURES (DENTS, DECALS, TRAILER HITCHES, INTERIOR, ETC): Loaded

HAS A CB, RADIO OR CAR PHONE BEEN ADDED RECENTLY? NO

IF SO, MAKE AND MODEL OF EQUIPMENT: NA

WHO INSTALLED THE EQUIPMENT: NA

HAS VEHICLE BEEN DAMAGED DURING THE PAST THREE YEARS? NA

IF YES, DESCRIBE LOCATION, TYPE, AMOUNT, DATE: NA

WERE REPAIRS COMPLETED FULL OR PARTIAL: NA BY WHOM: NA

NAME AND ADDRESS OF INSURANCE COMPANY WHO PAID FOR DAMAGES: NA

SECTION VI.

ANY OTHER CLAIMS OR THEFTS IN LAST 3 YEARS ON THIS OR ANY OTHER VEHICLE: NO

TYPE OF CLAIMS: NA

ANY OTHER VEHICLES IN YOUR HOUSEHOLD? IF YES, LIST: NA

NAME OF INSURANCE COMPANY AND AGENT ON OTHER VEHICLE: NA

YOUR PRIOR INSURANCE COMPANY AND AGENT: NA

HAS CAR RECENTLY BEEN FOR SALE? N

SECTION VII.

DATE CAR PURCHASED: 9/6/00 NEW OR USED: USED PURCHASE PRICE: \$20,500.00

SELLER/DEALER/INDIVIDUAL: John Strong

NAME/ADDRESS: \_\_\_\_\_

8482-825-5 2578

HOW WAS CAR PAID FOR? cash  
 IF FINANCED, NAME AND ADDRESS OF FINANCE COMPANY: NA  
 ACCOUNT/LOAN NUMBER: NA BALANCE DUES: NA  
 LOAN TERM (IF OF MONTHS): NA MONTHLY PAYMENT: \$ NA  
 DATE WHEN LAST PAYMENT MADE: NA IS ACCOUNT PAID DUE, IF YES, HOW LONG: NA

**SECTION VI**

IF ANY INFORMATION PROVIDED IN THIS AFFIDAVIT IS FALSE, IT MAY BE THE BASIS FOR DENIAL OF YOUR CLAIM AND POSSIBLE LEGAL ACTION (IF APPROPRIATE). THIS AFFIDAVIT MUST BE SIGNED, NOTARIZED AND RETURNED BY MAIL TO A TICO INSURANCE COMPANY'S CLAIMS OFFICE. ALL QUESTIONS MUST BE ANSWERED, OR THIS AFFIDAVIT MAY BE REJECTED.

I UNDERSTAND THAT THE INSURANCE COMPANY MAY CONDUCT REASONABLE INQUIRY INTO MY BACKGROUND, CHARACTER, OR CREDIT HISTORY.

ARE THE ANSWERS YOU HAVE GIVEN TO THE BEST OF YOUR KNOWLEDGE AND BELIEF? yes

POLICYHOLDER: [REDACTED]  
 ADDRESS: [REDACTED] West Chester, PA  
 WITNESS: [REDACTED]

SUBSCRIBED AND SWORN TO, BEFORE ME, THIS 13<sup>th</sup> DAY OF October, 2000

*[Signature]*  
NOTARY PUBLIC

NOTARY PUBLIC  
 BIANA L. BOWEN, Notary Public  
 West Chester, Ohio, Chester County  
 My Commission Expires October 25, 2007

ANY PERSON WHO PROVIDES AND KNEW INTENT TO DECEIVE OR OBTAIN ANY BENEFIT FROM AN APPLICATION OR CLAIM CONTAINING ANY FALSE OR MISCELLANEOUS INFORMATION, UPON CONVICTION, IS SUBJECT TO IMPRISONMENT FOR UP TO 7 YEARS AND PAYMENT OF A FINE OF UP TO \$25,000.



FROM:

FRN110 20' 00 11/18/97 11:05/NO. 4861810792 P 6

07/28/00

VEHICLE HISTORY

1007:27

MAIN LINE TIRE & SERVICE INC  
87 E LANCASTER AVENUE

PAOLI, PA 19301  
(610)644-2686

CUSTOMER: 12918 CASH

NEWTOWN SQUARE, PA

HOME PHONE: 9846  
BUSINESS:  
BILL TO ACCT: 9846

TAX STATUS: TAXABLE  
E/D/S: CONSUMER  
STATUS:  
LAST INVOICE: 071926

LAST PURCHASE DATE: 08/23/00  
PURCHASES THIS MONTH: 0.00  
YEAR TO DATE TOTAL: 348.60  
TOTAL PRIOR YEAR: 715.15

VEHICLE IDENTIFICATION: 98 MERCURY GRAND MARQUE

LICENSE: 2H0912  
LICENSE STATE: PA  
COLOR: BLUE

LAST SERVICE: 08/23/00  
MILES/MONTH: 60

TREAD DEPTH: LEFT FRONT:  
LEFT REAR:

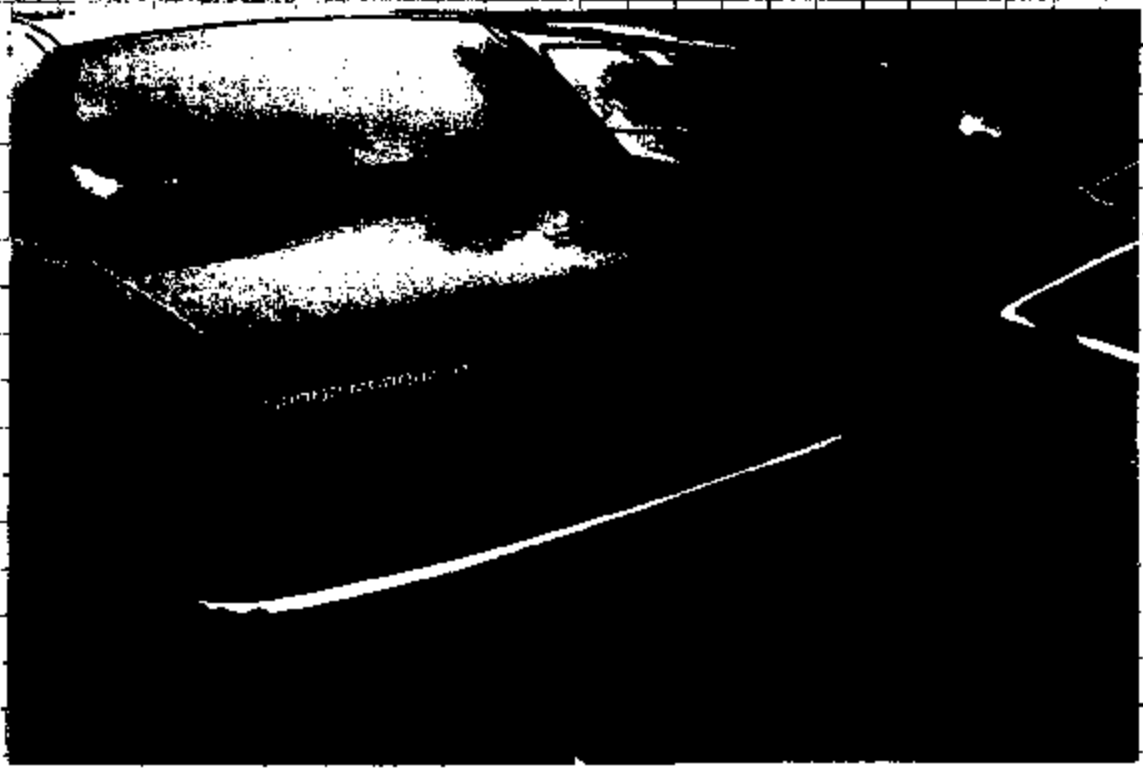
RIGHT FRONT:  
RIGHT REAR:

SERVICE HISTORY

DESCRIPTION	QTY	INVOICE	DATE	ODOMETER	MECHANIC
RIGHT FRONT TURN SIGNAL LENS (1	1	071926	08/23/00	23076	VRS
FOR TO R & R IN TANK FUEL PUMP	1	071926	08/23/00	23076	VRS
IN THE TANK FUEL PUMP ASBY.	1	071926	08/23/00	23076	VRS
STATE EMISSION CERT. TEST	1	071926	08/23/00	23076	VRS
RELATED VEHICLE INSPECTION	1	071926	08/23/00	23076	VRS
60 MONTH INTERSTATE BATTERY	1	060778	07/31/99	23080	BKH
EXX BATTERY SYSTEM	1	063778	07/31/99	23080	BKH
FRIGERANT PER POUND R12	2	065823	07/16/99	24305	RJI
CONDITIONING PERFORMANCE TES	1	065823	07/16/99	24305	RJI
PLACE WIPER BLADES	2	064220	04/27/99	24175	BPH
WIR TO R & R SPARK PLUG WIRE 8	1	064220	04/27/99	24175	BPH
IGNITION WIRE SET & CYLINDER	1	064220	04/27/99	24175	BPH
PLACE PCV VALVE	1	064220	04/27/99	24175	BPH
EL FILTER - FUEL INJECTION	1	064220	04/27/99	24175	BPH
EL FILTER	1	064220	04/27/99	24175	BPH
CATERYZED ANALYSIS & 8 CYLINDR	1	064220	04/27/99	24175	BPH
LINE SYSTEM MAINTENANCE SERVI	1	064220	04/27/99	24175	BPH
OIL BALANCE - COMPUTER SPIN	4	064220	04/27/99	24175	BPH
WATS MOUNTED TIRE	4	064220	04/27/99	24175	BPH
EL FLUIDS TO LEVEL	1	064220	04/27/99	24175	BPH
EL - OIL CHANGE - OIL FILTER	1	064220	04/27/99	24175	BPH
STATE EMISSION CERT. TEST	1	064220	04/27/99	24175	BPH

0982-825-3 2572

**Photo Mounting Sheet**





**Photo Mounting Sheet**



3

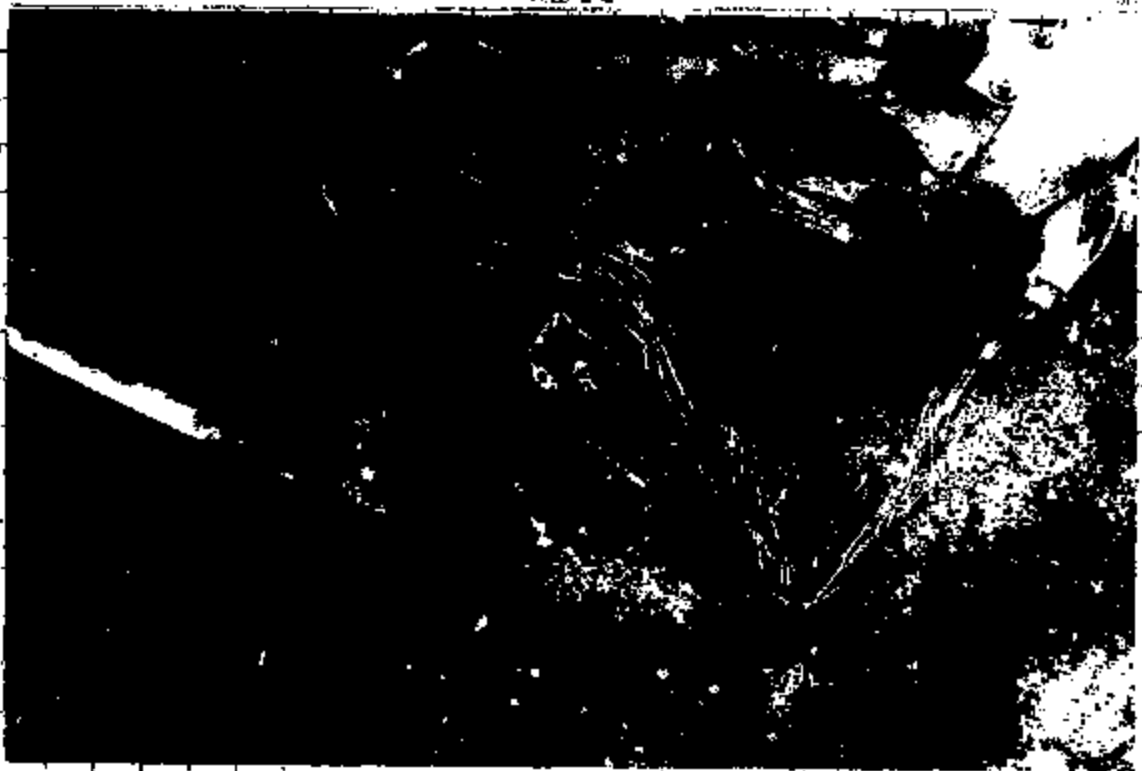


4

**Photo Mounting Sheet**



5



6

**Photo Mounting Sheet**



7

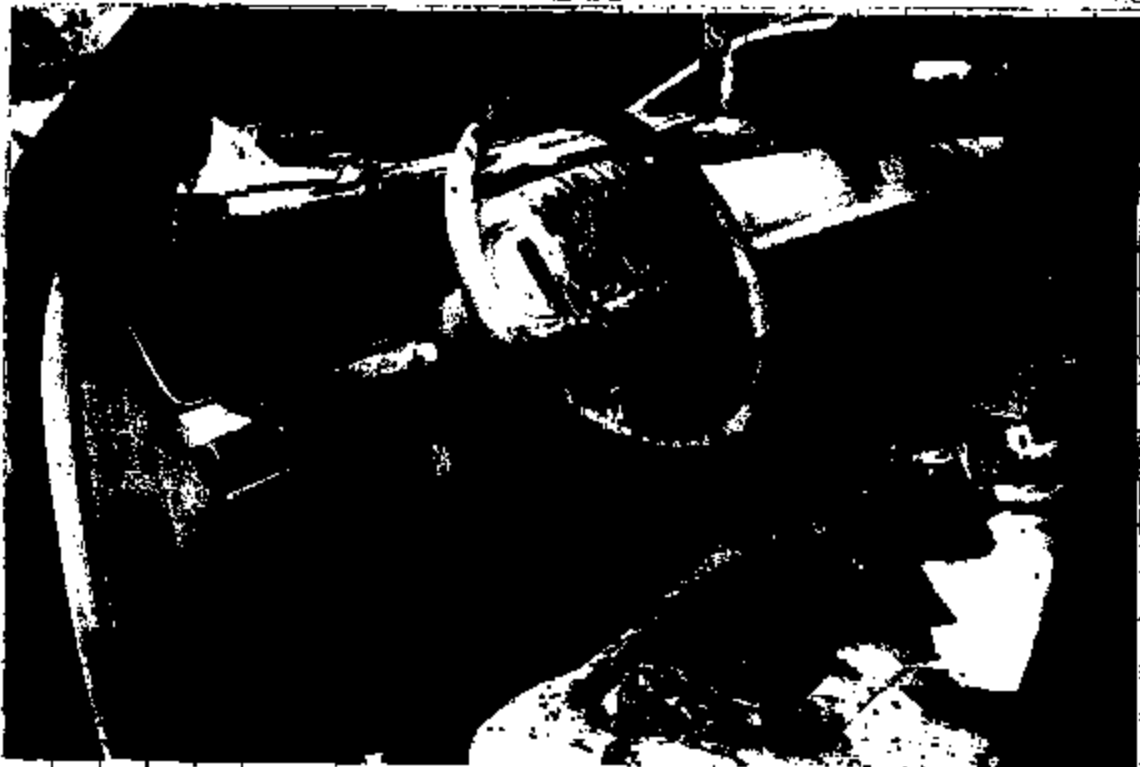


8

**Photo Mounting Sheet**



9



10

**Photo Mounting Sheet**



11



12

**Photo Mounting Sheet**



13



14



**Photo Mounting Sheet**



15



16

Photo Mounting Sheet



17



18

**Photo Mounting Sheet**



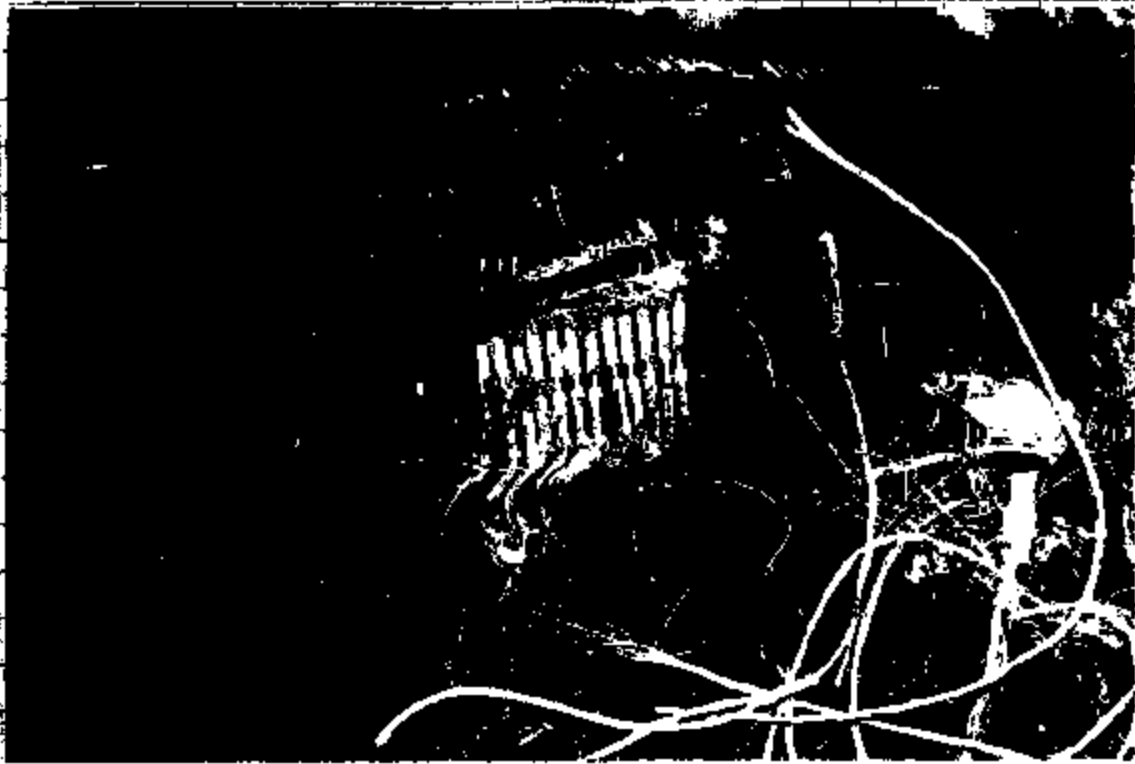
19

ROADSIDE



20

# Photo Mounting Sheet



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# Vehicle Information Report

**GENERAL VEHICLE INFORMATION:**

(Related Clones)

VIN: 2MCHT5W82GJ523063 Vch Line: CFF - GRAND MARQ (DISCONT 14) (S2-81) Reg State: PA W  
 Model Year: 1991 Model Description: CFF - L/M DIVISION DERIVATIVE Body Style: \*  
 Vch Type: C Drive Code: CFF - 2 WFL/LN REAR DRIVE Engine: CFF - 2.0 L/M 16V SOHC EFI NA CIVI Q-MP  
 Est. Date: 1991 Body Chk Style: CFF - 4 DOOR SEDAN-4 LITE Transmission: CFF - 4 SPD AUTO TRANS NAAD AOD\*KT  
 Wash/Finish: CFF - LE VERSION - CAR

**BUILD INFORMATION:**

Region: NA - 2MCHT5W82 Plant: AW - ST. THOMAS PLANT BLDG  
 Country: CAN - 2MCHT5W82 Prod Date: 02-APR-1991

**SALE INFORMATION:**

Region: NA - 2MCHT5W82 Selling Dealer: 31204 - \*  
 Country: USA - 2MCHT5W82 Selling Div: B/W/PA PA  
 Super Division: PA  
 Arrival Date: 18-APR-1991 Roll Copy: Loose \*  
 Sale Date: 05-MAY-1991 Ford/Whelan/Co. Lease R  
 Warranty Start Date: 05-MAY-1991 Mileage: Vehicle \*  
 Only Warranty Date: 05-MAY-1991 Mileage: Vehicle \* Vehicle Report Flag: H

**VOE/EOC:**

-----  
 MCHT5W82 CFF 2MCHT5W82 2MCHT5W82 2MCHT5W82 2MCHT5W82 2MCHT5W82 2MCHT5W82 2MCHT5W82 2MCHT5W82 2MCHT5W82  
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1990-03-03 2004

**INSTALLED OPTION INFORMATION:**

Air Conditioning	CC - A/C AIR CONDITIONER	GVM Code	-
Alternate Amp Rating *		GVM Class Code	C
Audio Deck	* - [N/A]	Navigation	AC - ELECTRONIC INSTRUMENTATION
Audio Power	EGACC - 150 WATT AMPLIFIED	Mirror (Driver Side)	* - [N/A]
Audio Type	EGMAC - LIMITED SLP REAR AXLE	Mirror (Pass. Side)	* - [N/A]
Battery Amp Rating	FC	Paint	FDGMS - TWILIGHT BLUE CC 42
Brake Code	* - [N/A]	Power Windows	AE - POWER TELESCOPIC RADIO ANTENNA
Brake Control/Package	* - [N/A]	Radio	AQ - FLETS PREMIUM AM/FM STEREO
Calibration Code	2HARDDA	Seat Belts	* - [N/A]
Color (Asphalt)	* - [N/A]	Seat Trim Code	* - [N/A]
Color (Trim)	60M4 -	Tire Brand	AJ - MICHELIN - RECYCLABLE
Delivery Type	0	Tire Size	DDGPF - P235/HR15 WSW
Drivetrain Code	*	Trailer Control	AR - ANTI-SPIN TRACT BRAKES W/O TVD
Front Seat	CK - SEAT-SPLIT REAR	Wheel Type	* - [N/A]
Front Type	* - [N/A]		

**TIRE DOT INFORMATION:**

LF1	* RF:	*
LF2	* RB:	*
LF3	* RC:	*
SPARE	*	*

**ESP INFORMATION- EMISSIONS INFORMATION:**

ESP Code	* Exhaust Code	CS - CS
ESP Coverage (Off-Road)	* Exhaust Cool Type	F
ESP Coverage (On-Road)	* Exhaust Serial Number	HAA
ESP File Year	* Engine Family	MF860V500F0
ESP Signature Code		

Any comments? You can contact



FORM 8-200-2000

# Claim Detail Report

*Note: All costs are in US dollars*

Model Year = 1992; Claim Key = 10994541

### Vehicle Information

Model Year: 1992  
 Market Derived: C/M - L-M DIVISION DERIVATIVE  
 Body/Cab Type: C/PA - 4 DOOR SEDAN-4 LITE  
 Version/Series: C/AJ-L9 VERSION - CAR  
 Drive Type: C/B-2 WHL L/H REAR DRIVE  
 Vehicle Line: C/P-GRAND MARQ (EN53/EN114)  
 [92-01]  
 Warranty Start Date: 18-MAY-1991  
 Production Date: 08-APR-1991  
 VIN: 2MECM75WSNX615853

### Claim Information

Document Number: 024929  
 Repair Date: 25-APR-1991  
 Distance: 8  
 TIS: 0

### Dealer Information:

Dealer Name: MURPHY LINCOLN MERCURY  
 Dealer Code: 10447 - \*  
 Address: 1501 WEST CHESTER PIKE  
 City: WEST CHESTER  
 State: PA Zip Code: 19382  
 Country: USA Region Code: NA  
 Phone: (610)692-8110

### Expenses Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 24.5  
 Misc. Expense Amount: 0  
 Part Markup Amount: 0  
 Material Cost: 0  
 Total Cost Gross: 24.5

Cust. Concern Code: \* -  
 Condition Code: \* - [N/A]

Technician Comment:

Customer Comment:

Labor Op Code	Labor Op Description	Labor Op Cost
23942B	TRIM PANEL-FRONT DOOR REMOVE AND INSTALL	0
23942B3	CORRECTION OF SQUEAKS & RATTLES OR PERFORM MINOR ADJUST	0

Canal	Full Part Number	Part Description	Part CPSC	Extended Quantity	Part Extended Amount
Y	* 23942	* PNL ASY-PT DR TRIM NANANA	0	0	0

Any comments? You can contact



webmaster



# Claim Detail Report

*Note: All costs are in US dollars*

Model Year = 1992; Claim Key = 10994540

**Vehicle Information**

Model Year: 1992  
 Market Derived: C/M - L-M DIVISION DERIVATIVE  
 Body/Cab Type: C/FA - 4 DOOR SEDAN-4 LITE  
 Version/Series: C/AJ-LS VERSION - CAR  
 Drive Type: C/B-2 WHL L/H REAR DRIVE  
 Vehicle Line: C/FP-GRAND MARQ (EN53/EN114)  
 [92-01]  
 Warranty Start Date: 18-MAY-1991  
 Production Date: 08-APR-1991  
 VIN: 2MECM75W5NX615853

**Claim Information**

Document Number: 024929  
 Repair Date: 25-APR-1991  
 Distance: 8  
 TIS: 0

**Dealer Information:**

Dealer Name: MURPHY LINCOLN MERCURY  
 Dealer Code: 10447 - \*  
 Address: 1501 WEST CHESTER PIKE  
 City: WEST CHESTER  
 State: PA Zip Code: 19382  
 Country: USA Region Code: NA  
 Phone: (610)692-8110

**Expense Information**

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 29.4  
 Misc. Expense Amount: 0  
 Part Markup Amount: 0  
 Material Cost: 0  
 Total Cost Gross: 29.4

Cur. Concern Code: \* -

Condition Code: \* - [N/A]

Technician Comment: AUTHORIZATION 0152D

Customer Comment:

Labor Op Code	Labor Op Description	Labor Op Cost
7110B	INDICATOR - TRANSMISSION CONTROL SELECTOR ALIGN	0

Cause/Flag	Full Part Number	Part Description	Part CPSC	Extended Quantity	Amount
Y	* 7A110	* INDICATOR CNTRL SELC	110402	0	0

Any comments? You can contact



webmaster

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 10994542

## Vehicle Information

Model Year: 1992

Market Derived: C/M - L-M DIVISION DERIVATIVE

Body/Cab Type: C/FA - 4 DOOR SEDAN-4 LITE

Version/Series: C/AJ-LS VERSION - CAR

Drive Type: C/B-2 WHL L/H REAR DRIVE

Vehicle Line: C/FP-GRAND MARQ (EN53/EN114)  
(92-01)

Warranty Start Date: 18-MAY-1991

Production Date: 08-APR-1991

VIN: 2MECM75WSNX615853

## Dealer Information:

Dealer Name: MURPHY LINCOLN MERCURY

Dealer Code: 10447 - \*

Address: 1501 WEST CHESTER PIKE

City: WEST CHESTER

State: PA Zip Code: 19382

Country: USA Region Code: NA

Phone: (610)692-8110

## Claim Information

Document Number: 025658

Repair Date: 05-JUN-1991

Distance: 669

TIS: 1

## Expense Information

Customer Paid Amount: 0

Deductible Amount: 0

Dealer Paid Amount: 0

Labor Cost: 73.5

Misc. Expense Amount: 0

Part Markup Amount: 0

Material Cost: .9

Total Cost Gross: 74.4

Cust. Concern Code: \* -

Condition Code: \* - [N/A]

Technician Comment:

Customer Comment:

Labor Op Code	Labor Op Description	Labor Op Cost
14200A	WIRING ASSEMBLY REPAIR	0
51916B	HEADLINING-ROOF ACCESS	0

Causal Flag	Full Part Number	Part Description	CPSC	Quantity	Part Extended Amount
Y	* 13B711	* WIRE ASY COURTESY LM 170202	0	0	0
N	D9ZZ 14526	D FUSE-ELECTRICAL CIRC 1801XX	1	0	0

Any comments? You can contact



webmaster

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 10994543

### Vehicle Information

Model Year: 1992

Market Derived: C/M - L-M DIVISION DERIVATIVE

Body/Cab Type: C/FA - 4 DOOR SEDAN-4 LITE

Version/Series: C/AJ-LS VERSION - CAR

Drive Type: C/B-2 WHL L/H REAR DRIVE

Vehicle Line: C/FP-GRAND MARQ (EN53/EN114)  
[92-01]

Warranty Start Date: 18-MAY-1991

Production Date: 08-APR-1991

VIN: 2MECM75W5NX615853

### Claim Information

Document Number: 040781

Repair Date: 18-OCT-1993

Distance: 13251

TIS: 30

### Dealer Information:

Dealer Name MURPHY LINCOLN MERCURY

Dealer Code: 10447 - \*

Address: 1501 WEST CHESTER PIKE

City: WEST CHESTER

State: PA Zip Code: 19382

Country: USA Region Code: NA

Phone: (610)692-8110

### Expense Information

Customer Paid Amount: 0

Deductible Amount: 0

Dealer Paid Amount: 0

Labor Cost: 150.72

Misc. Expense Amount: 0

Part Markup Amount: 0

Material Cost: 0

Total Cost Gross: 150.72

Cost Concern Code: D50 - OTHER ENGINE TROUBLES

Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)

Technician Comment:

Customer Comment:

### Labor Op Code Labor Op Description Labor Op Cost

REFUND 0

Causal	Full	Part	Part	Extended			
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity	Amount
Y	*	5230	*	MUFFLER ASY 090101	0	0	

Any comments? You can contact



*walmart*

# NATIONAL CASUALTY COMPANY

Claims Division  
5877 North Gateway Center Drive  
Scottsdale, Arizona 85258

Reply to:

Post Office Box 4120  
Scottsdale, AZ 85261-4120

Telephone  
480-948-0505  
FAX 480-483-6732

November 5, 2000

Ford Motor Co  
Office of General Counsel  
Park Lane Towers West # 400  
3 Park Lane Blvd  
Dearborn, MI 48126

Our Insured: [REDACTED]  
Claim Number: [REDACTED]  
Date of Loss: 9-10-2000



National Casualty Company carries a Policy of Insurance on [REDACTED]. A claim has been presented under that policy for payment of damages and /or injuries that resulted from the above accident.

Our investigation to date indicates you were primarily liable for the accident, and the loss sustained by our insured.

We are placing you on notice of our rights under the policy to recover any monies paid to our insured for this loss from you as the negligent party.

If you carried a policy of insurance to cover this loss, we would suggest you report this matter to your insurance company immediately. Please complete the attached form and return to us as soon as possible.

If you have any questions, wish to discuss this further or are unable to make payment call 1-800-423-7675 ext. 2854.

Very Truly Yours,

  
Kenneth S. Fulgoni  
Transportation Recovery Analyst

Agent #37011

ENR2-823-8 2884