

EA02-025

10-27-03

**FORD 10/27/03
LETTER TO ODI
ATTACHMENT M
BOOK 1 OF 22
PART A – D
PART D**

402081

ENC-020-8 1405

Ford

Office of the General Counsel

Ford Motor Company
Parklane Towers West
Suite 400
Three Parklane Boulevard
Dearborn, Michigan 48128-6585

September 9, 1998

O'Brien & Hennessy
12 Exchange Street
Charleston, SC 29401
ATTENTION: JOHN J O'BRIEN

Re: Claimant: [REDACTED]
Y/Claim No.: [REDACTED]
D/E: October 29, 1998

Dear Mr. O'Brien:

We are in receipt of your letter dated September 1, 1998.

It is our opinion the material submitted does not sufficiently support your allegation that Ford Motor Company is solely responsible for this loss. We understand you are preserving the vehicle. However, it would be incorrect to assume that Ford Motor Company does not wish to inspect the vehicle. 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 completed.

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.

Sincerely,

Shawn L. Norton
Claims Analyst

cc: claims \dual\ [REDACTED]

REDACTED

ERR2-025-B 1460N



LAW OFFICES OF
O'BRIEN & HENNESSY

12 EXCHANGE STREET
CHARLESTON, SC 29401

DAVID H. MAYBANK, JR.

REFUND TO:
TELEPHONE: 843-723-0412
FACSIMILE: 843-723-8738

September 01, 1998

Shawn Norton
Claims Analyst
Ford Motor Company
Parklane Towers West
Suite 400
Three Parklane Blvd.
Dearborn, MI 48126-2568

44208102

RE: Our Client: [REDACTED]
Our Insured: [REDACTED]
Our Claim #: [REDACTED]
Date of Loss: 10-29-96

Dear Shawn:

I have received your correspondence dated August 18, 1998 and thank you for same. I enclose a copy of our origin and cause report. The vehicle itself is located at the [REDACTED] in Surfside Beach, South Carolina.

We really do not have any defective part(s) to send to you.

The claim arose when our insured parked his 1994 Lincoln Town Car under his residence. The car's engine caught fire and spread to the house resulting in a total loss of the residence. You should have a record of all of this in your file-Claimant [REDACTED]

We cannot pinpoint the exact component that caused the fire; however, under warranty principles this vehicle should not catch fire and there is no other intervening cause that the fire can be attributed to.

I believe in South Carolina I will be successful in recovering under this claim. In addition, our research has disclosed numerous engine fires involving the Lincoln Town Car.

☐ [REDACTED] WEST CHESTER, PENNSYLVANIA TELEPHONE: [REDACTED] FACSIMILE: [REDACTED]	☐ [REDACTED] VOORHEES, NEW JERSEY TELEPHONE: [REDACTED] FACSIMILE: [REDACTED]	☐ [REDACTED] SAN LUIS OBISPO, CALIFORNIA TELEPHONE: [REDACTED] FACSIMILE: [REDACTED]	☐ [REDACTED] SAVANNAH, GEORGIA TELEPHONE: [REDACTED] FACSIMILE: [REDACTED]
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ENCLOSURE 1472

Rather than litigating this matter, I spoke to [REDACTED] and requested the lowest possible authority I have. They have authorized us to settle this \$115,000.00 claim for 50%, or \$57,500.00. Please let me know at your earliest convenience if we can resolve this matter.

With best wishes, I am

Sincerely yours,

O'BRIEN & HENNESSY



John L. O'Brien

HO'B/fbd

cc: [REDACTED]



Office of the General Counsel

Ford Motor Company
Parklane Towers West
Suite 400
Three Parklane Boulevard
Dearborn, Michigan 48126-2500

August 18, 1998

O'Brien & Henneary
12 Exchange Street
Charleston, SC 29401
ATTENTION: JOHN H. O'BRIEN

Re: Claimant: [REDACTED]
D/E: October 29, 1998
Y/Claim #: [REDACTED]

Dear Mr. O'Brien:

We will be pleased to conduct non-destructive testing on those parts you believe to be defective if you choose to remove and ship them at your own expense. Please closely follow the directions listed in the attached shipping instructions.

Without having the opportunity to inspect the alleged defective part(s), we will have no alternative but to deny responsibility for this claim.

We again remind you 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.

Sincerely,

Shawn L. Norton
Claims Analyst

dmb

c:\claims\dmb\sondastz.doc

```
*****
*
* *****
*  GENERATED BY:
*  SHAWN NORTON
*
*  PHONE: 322-3269
*
*  JOB: CG001661
*
*  JOBDATE: 08/21/97
*
*  TIME: 2:28:37
*
* *****
```

PRODUCTION VERSION 2.7

VEHICLE HISTORY (88-II) TYPE

- ```
* MODEL YEAR - 92
* CUT-OFF DATE - 14JUL97
* REPORT TITLE -
* VEHICLE TYPE - CR2
* REPORT CLAIM TYPE - ALL CLAIMS
* REPORT SORT SEQUENCE - PLANT CODE \ SERIAL NO
* PAGE ON PRIMARY SORT?-
* PARKTO MIA VALUE -
* PLANT/SERIAL NUMBERS - T640351
```

21AUG87  
PAGE 2.01

1992 SE-II PARTS BY CONDITION CODE SUMMARY (14JUL97 C/O)  
DATA ORDERED BY DESCENDING PART NO. FREQUENCY  
MR PARTS&S GEORGE BOSTON

| PART NO | CD | COUNT |
|---------|----|-------|
| ALBAL   | 92 | 1     |
| DIAG    | 42 | 1     |
| ESTMR   | CS | 1     |
| 1125    | 13 | 1     |
| 17D957  | B2 | 1     |
| 7F330   | 08 | 1     |
| 703144  | 56 | 1     |
| 704320  | 56 | 1     |
| 761710  | 33 | 1     |
| 8620    | 56 | 1     |

1402-026-5 1470



21AUG97  
PAGE 3.01

1992 SE-11 PARTS BY CUSTOMER CONCERN CODE SUMMARY (14JUL97 C/O)  
DATA ORDERED BY DESCENDING PART NO. FREQUENCY  
MR PARTNERS SHANE MORTON

| PART NO | CCC | COUNT |
|---------|-----|-------|
| ALMAL   | B22 | 1     |
| DIAG    | B49 | 1     |
| RTRE    | ANY | 1     |
| 1125    | B27 | 1     |
| 170957  | P01 | 1     |
| 7F330   | B99 | 1     |
| 703144  | B23 | 1     |
| 704320  | B01 | 1     |
| 761710  | B03 | 1     |
| 8620    | B02 | 1     |

ENC-025-8 1498

1992 SE-II PART/CONCERN CODE DESCRIPTION SUMMARY (14JUL87 C/O)  
DATA SORTED BY DESCENDING REPAIR COUNT

| NUMBER | PART DESCRIPTION     | COUNT | CT-DESCRIPTION     | COUNT | CUSTOMER CONCERN CODE DESCRIPTION (CCC)  | COUNT |
|--------|----------------------|-------|--------------------|-------|------------------------------------------|-------|
| ALBAL  | ALL WHEEL BALANCE    | 1     | 56                 | 3     | ANY                                      | 1     |
| DIAG   | DIAGNOSIS            | 1     | CS                 | 1     | N23-WIND NOISE (BODY SEALING)            | 1     |
| ENTIRE | ENTIRE, MULTI-PANEL  | 1     | 02                 | 1     | N49-NOISE/BATTLE (EXHAUST SYSTEMS)       | 1     |
| 1125   | DRUM-FRONT BRAKE     | 1     | 08-OTHER/UNKNOWN   | 1     | N81-APPEARANCE (PAINT/FINISH)            | 1     |
| 17D957 | FRT BUMPER COVER AS  | 1     | 13-OUT OF ROAD     | 1     | N81-NOISE-INSIDE PASSENGER COMPARTMENT   | 1     |
| 7F330  | INSL IN THROT VALVE  | 1     | 33-LOOSE           | 1     | N82-NOISE-UNDER HOOD/FRONT OF VEHICLE    | 1     |
| 703144 | MLOG W SHLD OUT      | 1     | 42-DORS NOT OPERAT | 1     | N22-VEHICLE VIBRATES WHILE DRIVING- < 45 | 1     |
| 704320 | PANEL AST-INSTRUMENT | 1     | 92                 | 1     | N27-VIBRATION OR SHUDDER WHILE BRAKING   | 1     |
| 761710 | TRACK-FRONT SEAT     | 1     |                    | 1     | N55-OWNER NOTIFICATION PROGRAM REPAIR    | 1     |
| 8620   | SELT-W/POWE FRAGEN   | 1     |                    | 1     | S03-SEAT LOOSE/ROCKING-FRONT             | 1     |

1992-123-1 1481

| VEHICLE INFORMATION                                                                                   |             |            |           |              |              |              | REPAIR INFORMATION |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
|-------------------------------------------------------------------------------------------------------|-------------|------------|-----------|--------------|--------------|--------------|--------------------|---------------------|------------------------|-----------|------------|--------------|-------------|---------------|--------------|--------------|-----------|--------------|-----|-------|----|
| SERIAL<br>NUMBER                                                                                      | CAR<br>LINE | B/S<br>CCI | PLT<br>MM | PROD<br>DATE | WARR<br>DATE | SEAL<br>DEAL | CLAIM<br>NUMBER    | MICRO C<br>NUMBER S | WCC<br>PARTY<br>NUMBER | CC<br>CCC | CD<br>DATE | REPR<br>DATE | TIS<br>CODE | TACT<br>MILES | MATL<br>COST | TOTL<br>COST | LR<br>HRS | REPR<br>DEAL | ST  |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | LY150651           | 6Y04                | ENTRE                  | CS ANY CS | 24OCT91    | 0            | R23         | 3             | 20.15        | 114          | 2.0       | 10104        | GA  |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | 08257701           | 5V01                | 1125                   | 13        | N27        | 13           | 26ADG92     | 11            | 1            | 9441         | 425.42    | 543          | 2.5 | 10104 | GA |
| MONTHS-CLAIM #2                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-BRAKE VIBRATION                                                                                  |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-REPLACE FRONT AND REAR ROTORS AND PADS                                                           |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | 08257702           | 1003                | 8628                   | 56        | N02        | 56           | 26ADG92     | 11            | 1            | 9441         | 17.33     | 31           | 0.3 | 10104 | GA |
| MONTHS-CLAIM #3                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-SQUEAK FROM ENGINE                                                                               |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-REPLACE DRIVE BELT                                                                               |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | 08257703           | 6W03                | 703144                 | 26        | N23        | 56           | 26ADG92     | 11            | 1            | 9441         | 14.14     | 52           | 0.8 | 10104 | GA |
| MONTHS-CLAIM #4                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-WINDNOISE FROM WINDSHIELD                                                                        |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-REPAIR WINDSHIELD                                                                                |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | 08257691           | 5K04                | ALMAL                  | 92        | N22        | 92           | 25ADG92     | 10            | 1            | 9441         | 0.00      | 108          | 2.3 | 10104 | GA |
| MONTHS-CLAIM #5                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-VIBRATION WHILE DRIVING                                                                          |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-CHECK RIMOUT BALANCE 4 WHEELS                                                                    |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | TEB47191           | 2004                | DIAG                   | 56        | N49        | 42           | 24JAN94     | 28            | N84          | 32307        | 0.00      | 103          | 2.8 | 10104 | GA |
| MONTHS-CLAIM #6                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-DESP FOR EXCESSIVE SPARK KNOCK-ADVISE                                                            |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-GRDS ROND 11 ROND 111 POWER BAL.SPARK DNR FUEL TEST REL. COMP. UNABLE TO DUPLICATE AT THIS TIME. |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | TEB47192           | 6001                | 17D957                 | 12        | F81        | 12           | 24JAN94     | 28            | N84          | 32307        | 0.00      | 146          | 2.8 | 10104 | GA |
| MONTHS-CLAIM #7                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-FT NUMBER 18 FUELING (F01)                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-REFINISH FRONT BUMPER COVER                                                                      |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | TEB47193           | 7X04                | 761710                 | 33        | N83        | 33           | 24JAN94     | 28            | N84          | 32307        | 342.16    | 394          | 1.0 | 10104 | GA |
| MONTHS-CLAIM #8                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-DASH FT SEAT MOVES WHEN STOPPING (803)                                                           |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-LOOSE 33 REPLACE SEAT TRACK ASSEMBLY                                                             |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | TEB47201           | 6L01                | 704320                 | 56        | N01        | 56           | 24JAN94     | 28            | N84          | 32307        | 0.00      | 52           | 1.0 | 10104 | GA |
| MONTHS-CLAIM #9                                                                                       |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-BATTLE IN DASH (801)                                                                             |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-NOISE 56 WRR 32311 ROAD TEST R R DASH FOR ACROSS TUREPAIR DASH BRACK ON RIGHT DASH               |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| LNC 4SL WTY WIX                                                                                       | 170CT91     | 310CT91    | 10104     | 10104        | 10104        | 10104        | TEB47211           | 3C03                | 77330                  | 08        | N99        | 08           | 24JAN94     | 28            | N3B3         | 32307        | 0.66      | 16           | 0.3 | 10104 | GA |
| MONTHS-CLAIM #10                                                                                      |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| CCOM-93B31                                                                                            |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |
| TECH-COMPLETED                                                                                        |             |            |           |              |              |              |                    |                     |                        |           |            |              |             |               |              |              |           |              |     |       |    |

+ CLAIM \$101 OF 107 TOTAL CLAIMS

+ THIS LISTING CONTAINED 10 TOTAL CLAIMS

CSCN140

## VEHICLE DATA

97/08/18 11:26:36

ENTER VIN ==&gt; 1LNLM82W5NY640551

NAME ==&gt; [REDACTED]

ZIP ==&gt; [REDACTED]

MODEL YR ==&gt; [REDACTED]

OWNER NAME :

STREET ADDR :

CITY : MARIETTA

N/A DATE: 96-06-16

ST/PRV: GA CTRY:

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

MODEL YEAR : 92 PLANT: Y

SALE DATE: 91-10-31

BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES

PRODUCTION DATE: 91-10-17

VEHICLE DESC : 1992 TOWN CAR

|             | DIVISION | DISTRICT | ZONE | DEALER | FDC CODE | FCSD REGION |
|-------------|----------|----------|------|--------|----------|-------------|
| SHIP-TO     | 3        | 26       | A    | 050    | 45       | 21          |
| FACING      | 3        | 26       | A    | 050    |          |             |
| RESPONSIBLE | 3        | 26       | A    | 050    |          |             |

CA EMISSION :

ENGINE TAG CODE : [REDACTED]

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 03

DSO DISTRICT :

FLEET CODE : RC999

OPEN : 02 CLOSED : 01

DSO NUMBER :

FLEET STATUS : A

ACTIVE: 03 HISTORY: 00

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

OGDB166

CSCN150

CAMPAIGN VEHICLE INFORMATION

97/08/18 11:26:39

ENTER CAMPAIGN NUMBER==> 93B31 VIN==> 1LNLM82WSNY640551 TYPE OF SEARCH: A  
MODEL YEAR: 92 DEFECT: TV ROD BUSHG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
NEW STATUS CODE: \_\_\_\_\_ CAMP DIV : 6  
REPAIR INFORMATION: TYPE CODE: \_\_\_\_\_ SUPP CODE :  
REPAIR DATE: \_\_\_\_\_ DEALER P/A: \_\_\_\_\_ KIT CODE : AA  
MICRO REF: \_\_\_\_\_ CLAIM NUM: \_\_\_\_\_ OASIS DATE : 94-01-05  
DELETE REASON: \_\_\_\_\_ VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: NEW: \_\_\_\_\_ IND: MATCH CODE: 1  
CURRENT: 3 26 060 ASSIGNED: 97-06-18 SOURCE: PX EXTRACT DATE: 97-06-18  
\*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
C COMPLETE 94-02-01 B 94-01-24 10104 223283 TEB4721 AC  
H AWAITING MAILING 93-12-03

## DELETE REASON:

F1-INQUIRY F2-G140 F3=EXIT F5-G130 F7-FIRST F8=NEXT F9=MORE STATUS  
F10=ADD STATUS F11=REVISE  
I037=NO MORE DATA TO DISPLAY

OGDB166

CSCN130

## NOTIFICATION RECIPIENT HISTORY

97/08/18 11:26:41

==&gt;

ENTER CAMPAIGN NUM ==&gt; 93B31

VIN ==&gt; 1LNLM82W5NY640551

DEFECT : \_\_\_\_\_ BODY STYLE DESC: \_\_\_\_\_  
RESP DEALER : \_\_\_\_\_ BEGINNING MAILED DATE: \_\_\_\_\_  
RELEASE DESC : \_\_\_\_\_ ENDING MAILED DATE : \_\_\_\_\_  
CAMPAIGN DIV : \_\_\_\_\_ FLEET CODE: \_\_\_\_\_ FLEET MGMT LOC CODE: \_\_\_\_\_  
LAST NAME : \_\_\_\_\_ INITIALS: \_\_\_\_\_  
STREET ADDR1 : \_\_\_\_\_  
ADDR2 : \_\_\_\_\_ ST/PRV: \_\_\_\_\_  
CITY : \_\_\_\_\_ CTRY: \_\_\_\_\_  
ZIP/POSTAL CODE: \_\_\_\_\_ N-A SOURCE: \_\_\_\_\_ N-A EFF DATE: \_\_\_\_\_

\*\*\*\*\*

RESP DEALER : \_\_\_\_\_ BEGINNING MAILED DATE: \_\_\_\_\_  
RELEASE DESC : \_\_\_\_\_ ENDING MAILED DATE : \_\_\_\_\_  
CAMPAIGN DIV : \_\_\_\_\_ FLEET CODE: \_\_\_\_\_ FLEET MGMT LOC CODE: \_\_\_\_\_  
LAST NAME : \_\_\_\_\_ INITIALS: \_\_\_\_\_  
STREET ADDR1 : \_\_\_\_\_  
ADDR2 : \_\_\_\_\_ ST/PRV: \_\_\_\_\_  
CITY : \_\_\_\_\_ CTRY: \_\_\_\_\_  
ZIP/POSTAL CODE: \_\_\_\_\_ N-A SOURCE: \_\_\_\_\_ N-A EFF DATE: \_\_\_\_\_

F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140  
E888-NO NOTIFICATION WAS MAILED ON THIS VEHICLE FOR THIS CAMPAIGN CGDB166

ENTER CAMPAIGN NUMBER==> 95919 VIN==> 1LNLM82W5NY640551 TYPE OF SEARCH: A  
MODEL YEAR: 92 DEFECT: HOOD LATCH BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
NEW STATUS CODE: \_\_\_\_\_ CAMP DIV : 6  
REPAIR INFORMATION: \_\_\_\_\_ TYPE CODE: \_\_\_\_\_ SUPP CODE :  
REPAIR DATE: \_\_\_\_\_ DEALER P/A: \_\_\_\_\_ KIT CODE : AA  
MICRO REF: \_\_\_\_\_ CLAIM NUM: \_\_\_\_\_ OASIS DATE : 95-08-30  
DELETE REASON: \_\_\_\_\_ VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: \_\_\_\_\_ NEW: \_\_\_\_\_ IND: MATCH CODE: 1  
CURRENT: 3 26 060 ASSIGNED: 97-06-18 SOURCE: PX EXTRACT DATE: 97-06-18  
\*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
M RELEASED FOR MAILING 97-07-21  
M RELEASED FOR MAILING 96-08-21  
M RELEASED FOR MAILING 96-02-07  
M RELEASED FOR MAILING 95-08-30  
H AWAITING MAILING 95-08-08

## DELETE REASON:

F1-INQUIRY F2-G140 F3-EXIT F5-G130 F7-FIRST F8-NEXT F9-MORE STATUS  
F10-ADD STATUS F11-REVISE  
I037-NO MORE DATA TO DISPLAY

OGDB166

CSCN130

## NOTIFICATION RECEIPT HISTORY

97/08/18 11:26:45

ENTER CAMPAIGN NBR ==&gt; 95819

VIN ==&gt; 1LNLM82W5NY640551

DEFECT : HOOD LATCH BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES

RESP DEALER : BEGINNING MAILED DATE: 97-07-21

RELEASE DESC : OSU FOLLOW UP MAILED ENDING MAILED DATE : 97-07-21

CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:

LAST NAME : INITIALS: AM

STREET ADDR1 :

ADDR2 :

ST/PRV: GA

CITY : MARIETTA

CTRY:

ZIP/POSTAL CODE:

N-A SOURCE: P

N-A EFF DATE: 96-06-16

\*\*\*\*\*

RESP DEALER : BEGINNING MAILED DATE: 96-08-21

RELEASE DESC : OSU FOLLOW UP MAILED ENDING MAILED DATE : 96-08-21

CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:

LAST NAME : INITIALS: AM

STREET ADDR1 :

ADDR2 :

ST/PRV: GA

CITY : MARIETTA

CTRY:

ZIP/POSTAL CODE: 30064

N-A SOURCE: R

N-A EFF DATE: 95-08-30

F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140

Y032-PRESS F8 FOR MORE DATA

OGDB166



CSCN150

## CAMPAIGN VEHICLE INFORMATION

97/08/18 11:26:47

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 1LNLM82W5NY640551 TYPE OF SEARCH: A  
MODEL YEAR: 92 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
NEW STATUS CODE: \_\_\_\_\_ CAMP DIV : 6  
REPAIR INFORMATION: TYPE CODE: \_\_\_\_\_ SUPP CODE :  
REPAIR DATE: \_\_\_\_\_ DEALER P/A: \_\_\_\_\_ KIT CODE : CH  
MICRO REF: \_\_\_\_\_ CLAIM NUM: \_\_\_\_\_ OASIS DATE :  
DELETE REASON: \_\_\_\_\_ VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: NEW: \_\_\_\_\_ IND: MATCH CODE: 1  
CURRENT: 3 26 060 ASSIGNED: 97-06-18 SOURCE: PX EXTRACT DATE: 97-06-18  
\*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
M RELEASED FOR MAILING 97-03-05  
H AWAITING MAILING 96-11-22

## DELETE REASON:

F1=INQUIRY F2=Q140 F3=EXIT F5=Q130 F7=FIRST F8=NEXT F9=MORE STATUS  
F10=ADD STATUS F11=REVISE  
I037=NO MORE DATA TO DISPLAY

OGDB166

CSCN130

## NOTIFICATION RECIPIENT HISTORY

97/08/18 11:26:49

ENTER CAMPAIGN REF ==> 96L12 VIN ==> 1LNLM82WSNY640551  
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES  
RESP DEALER : 326060 BEGINNING MAILED DATE: 97-03-13  
RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-03-18  
CAMPAIGN DIV : 6 FLEET CODE: RC999 FLEET MGMT LOC CODE: 9999  
LAST NAME : INITIALS: AM  
STREET ADDR1 :  
ADDR2 : ST/PRV: GA  
CITY : MARIETTA CTRY:  
ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 96-06-16  
\*\*\*\*\*  
RESP DEALER : BEGINNING MAILED DATE:  
RELEASE DESC : ENDING MAILED DATE :  
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:  
LAST NAME : INITIALS:  
STREET ADDR1 :  
ADDR2 : ST/PRV:  
CITY : CTRY:  
ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE:  
F1-INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140  
I048-LAST PAGE OGDB166

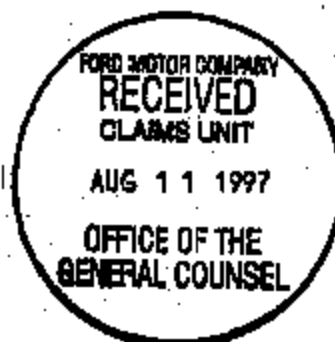


**Bankers Insurance Company**

August 4, 1997

MS. SKEVINGTON, GENERAL COUNSEL  
FORD MOTOR COMPANY  
PARK LANE TOWER WEST, #400  
3 PARK LANE BOULEVARD  
DEARBORN, MI 48128

RE: INSURED: [REDACTED]  
CLAIM#: [REDACTED]  
POLICY#: [REDACTED]  
DATE OF LOSS: 10-28-88  
AMOUNT OF LOSS: \$100,000.00



AC ✓  
402081

Dear Ms. Skevington:

The captioned loss occurred when a stilt house owned by the captioned insured was destroyed by fire originating in the engine compartment of a 1992 Lincoln Town Car, 4 door sedan, VIN - 1LNLM8ZWSNY840551. The automobile was owned by our insured and had been parked on the ground level of the residence just before the fire broke out.

Enclosed is documentation supporting the adjustment of this loss as well as evidence confirming that a malfunction of the engine component(s) caused the fire. If anything further is needed for your investigation, please contact me.

Bankers Insurance Company paid the policy limit of \$100,000.00 in settlement of this fire loss. Our investigation has confirmed that Ford Motor Company, the manufacturer of the vehicle, is liable for this loss. We therefore, look to you for reimbursement in the total amount of the loss.

Very truly yours,

Ramona Miller, AIC, AIS, CPW  
Senior Claims Representative

Enclosures

RM/pj

# ORIGIN & CAUSE, INC.

## FIRE INVESTIGATIONS

Philip M. Kennedy, Jr.

April 07, 1997

201 A Santiago Dr.  
Florence, S.C. 29501  
Office (803) 665-0870  
Fax (803) 665-7488  
Mobile (803) 667-1224  
Home (803) 665-0870

Ms. Heidi Shapter  
Banker's Insurance Company  
P O Box 15707  
St. Petersburg, Florida 33733

Subject: Vehicle Fire Investigation

1992 Lincoln Town Car 4DR Sedan  
VIN: 1LNLM82W5NY640551  
POLICY/CLAIM NO [REDACTED]  
D/L: 10-29-96

Dear Ms. Shapter:

At your request, an investigation was conducted into the fire loss in connection with the above-referenced case. The circumstances surrounding the loss were reviewed with you, [REDACTED] (owner), Capt. Danny Lussier (Murrells Inlet-Garden City Fire District), and an inspection of the loss was made. The vehicle was located at Low Country Wrecker, Surfside Beach, South Carolina. The vehicle showed the following burn damage:

### OUTSIDE BURN PATTERN:

|                        |                        |
|------------------------|------------------------|
| Engine:                | Burned.                |
| Passenger compartment: | Burned.                |
| Trunk area:            | Minor to heavy damage. |

### ENGINE:

|                        |                                                                   |
|------------------------|-------------------------------------------------------------------|
| Engine Size:           | 4.6L V8 EFI.                                                      |
| Radiator:              | Melted.                                                           |
| Condenser:             | Melted.                                                           |
| Battery:               | Melted.                                                           |
| Hoses:                 | Burned.                                                           |
| Fan belts:             | Burned.                                                           |
| Throttle Body:         | Melted.                                                           |
| Air cleaner:           | Burned.                                                           |
| Fuel pump:             | Electric.                                                         |
| Fuel line to the TBI:  | Metal lines heat exposure damage, the flexible lines were burned. |
| Fuel line to the tank: | Metal lines heat exposure damage, the flexible lines were burned. |
| Engine oil:            | Full.                                                             |
| Transmission fluid:    | Full.                                                             |
| Master cylinder:       | Reservoir melted.                                                 |

APR 11 8 09 PM '97

ORIG-025-B 1495

TIRES:

|                |                           |
|----------------|---------------------------|
| Left front:    | Burned; tread 02/32 inch. |
| Left rear:     | Burned; tread 02/32 inch. |
| Right front:   | Burned; tread 02/32 inch. |
| Right rear:    | Burned; tread 02/32 inch. |
| Hubscape:      | Matched.                  |
| Engine access: | Yes.                      |

PASSENGER COMPARTMENT:

|                     |                                 |
|---------------------|---------------------------------|
| Instrument panel:   | Burned.                         |
| Upholstery:         | Burned.                         |
| Front seats:        | Burned.                         |
| Rear seats:         | Burned.                         |
| Left sills:         | Burned/damaged.                 |
| Right sills:        | Burned/damaged.                 |
| Front carpet:       | Burned/damaged.                 |
| Rear carpet:        | Burned/damaged.                 |
| Left front window:  | Down at the time of the fire.   |
| Left rear window:   | Up at the time of the fire.     |
| Right front window: | Up at the time of the fire.     |
| Right rear window:  | Up at the time of the fire.     |
| Left front door:    | Closed at the time of the fire. |
| Left rear door:     | Closed at the time of the fire. |
| Right front door:   | Closed at the time of the fire. |
| Right rear door:    | Closed at the time of the fire. |
| Accessories:        | In-dash AM-FM radio.            |

OTHER:

|             |                                    |
|-------------|------------------------------------|
| Gas Cap:    | Melted from heat exposure.         |
| Gas Tank:   | Intact, with heat exposure damage. |
| Trunk Area: | Smoke and heat effects damage.     |

Fire damage to the vehicle was heavy to severe except for the trunk area. Examination of the engine compartment revealed that the vehicle was equipped with a 4.6L V6 engine with fuel injection. The engine compartment was severely damaged by the fire. The battery (exhibit 14-01-7) was located on the right front of the engine compartment. Detailed examination of the remains of the electrical circuitry in the engine compartment (exhibits 14-01-7/03-07-03/03-07-6/18-01-4/18-01-22) along with the fusible links, the battery cables, showed no evident indications that there was an electrical malfunction within the engine compartment that could have been responsible for the initiation of the fire. Examination of the remains of the cooling system (exhibit 03-03-2) revealed that the cooling system was severely damaged as a result of the fire. Detailed examination of the remains of the fuel system (exhibits 3-07-6/03-04-2/03-04-3-03-12-2/03-13-6/10-01-5) revealed that there was severe damage to the fuel supply system. Examination of the exhaust system revealed, that all components were in place and there were no indications that ~~malfunction within the exhaust system~~ contributed to the initiation of the fire. Examination of the automatic transmission and its related components (exhibit 07-01A-4)

Ms. Heidi Shap...  
April 07, 1997  
Page 3

revealed no evident indications of a transmission fluid leak that contributed to the initiation of the fire.

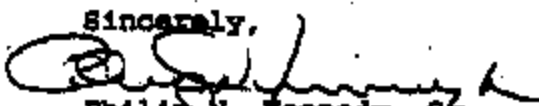
Examination of the passenger compartment revealed heavy to severe fire damage. The burn and the heat exposure patterns indicated that the fire apparently egressed into the passenger compartment from the engine compartment area. Examination of the remaining wiring circuitry, the components, and the other electrical devices in the instrument panel and the instrument cluster (exhibits 01-12-3/01-12-4/1104-3/11-04-19/1104-25/11-05-2/11-05-5/12-00-5/13-01A-2/18-01-2/18-01-24) revealed, no evidence of an electrical malfunction that could have been responsible for the initiation of the fire. There were no indications that an electrical malfunction was responsible for the initiation of the fire. All major electrical components were protected by a fuse, a relay or fusible links, in the event that there was an overload, the fuse, the relay or the fusible link would have separated, protecting the electrical components and circuitry. Had in fact the fire originated from an electrical malfunction within the instrument panel area of the vehicle, there most probably would have been very little damage to the electrical wiring circuitry and or components. There were no indications of multiple points of origin, or signs of an explosion.

Photograph placement sheets, exhibits, other information regarding this vehicle, and copies of the fire reports are enclosed.

Based on the investigation as outlined above, the burn pattern characteristics, the concentrated heat exposure patterns, and other factors of the fire, it is concluded that the fire apparently originated in the engine compartment area of the vehicle. Due to the severity of the fire damage to the wiring, the electrical components, the fuel system and other devices, it was not possible to determine whether a specific malfunction was responsible for initiating rather than resulting from the fire. However, there is insufficient evidence to conclude that the fire was of other than accidental origin.

Please contact me if I can be of further assistance. CVO

Sincerely,

  
Philip N. Kennedy, Sr.  
Fire Investigator

0:25:22 AM

VINassist Version 1.13

02-06-1997

(c) by NICH 1991

Law Enforcement Edition

VIN:1LNLM82W5NY640551

| DIGIT  | DESCRIPTION       | MEANING                          |
|--------|-------------------|----------------------------------|
| 1      | Country of Origin | UNITED STATES                    |
| L      | Manufacturer      | LINC LINCOLN                     |
| N      | Vehicle Type      | LINCOLN PASSENGER CAR            |
| L      | Restraint System  | ACT.BELTS(ALL) W/AIR BAGS(FRONT) |
| N      | Line              | PASSENGER CAR                    |
| 82     | Body Style        | TOWN CAR SIGNATURE 4 DR SEDAN    |
| W      | Engine            | 4.6L EFI V8                      |
| 5      | Check Digit       | CHECK DIGIT VALID                |
| N      | Year              | 1992                             |
| Y      | Assembly Plant    | WIXOM, MI                        |
| 640551 | Sequence Number   | IN RANGE                         |

\*\*\*\*\* VIN Passed Test \*\*\*\*\*

VIN indicates a 1992 LINCOLN TOWN CAR SIGNATURE 4 DR SEDAN

(c) by NICH, 1991

# CLICK'N STICK PHOTO STATIONERY



POLICY

CLAIMANT

PICTURE NO.

DATE/TIME TAKEN

BY

WEATHER

LOCATION AND VIEW

COMMENTS

PICTURE NO.

DATE/TIME TAKEN

BY

WEATHER

LOCATION AND VIEW

COMMENTS

OUR FILE NO.

COMPANY CLAIM NO.



R.I.S. FORM 200-2-88

R.I.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712/1-800-484-7419 - S.C. 7474 FAX 1-808-918-7318

1982-828-8 1886



# CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]  
DATE/TIME TAKEN [REDACTED]  
INSURED [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 3

DATE/TIME TAKEN 02-10-97

BY PHILIP M. KENNEDY, SI

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

LEFT SIDE OF THE  
COMMENTS VEHICLE AS

VIEWED FROM THE LEFT  
REAR

PICTURE NO. \_\_\_\_\_

DATE/TIME TAKEN 02-10-97

BY PHILIP M. KENNEDY, SI

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

RIGHT SIDE OF THE  
COMMENTS VEHICLE AS

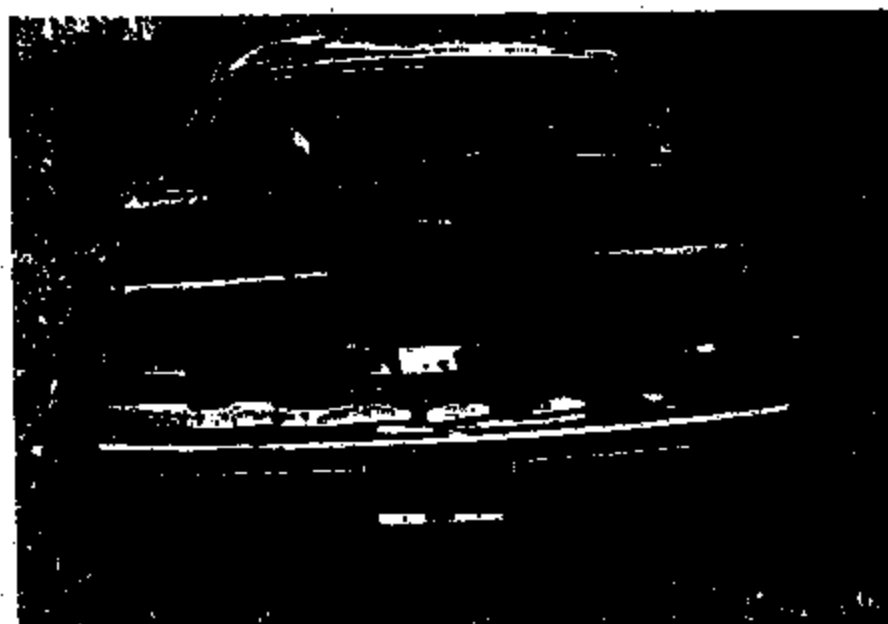
VIEWED FROM THE  
RIGHT FRONT

OUR FILE NO. \_\_\_\_\_

COMPANY CLAIM NO. \_\_\_\_\_



# CLICK'N STICK PHOTO STATIONERY



POLICE

DATE/LOSS 10-30-96

INSURED

CLAIMANT

PICTURE NO. 5

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

RIGHT SIDE OF THE  
COMMENTS VEHICLE AS

VIEWED FROM THE  
RIGHT REAR

PICTURE NO.

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

REAR SIDE OF THE  
COMMENTS VEHICLE

OUR FILE NO.

COMPANY CLAIM NO.

2992-825-B 1582

P.O.S. FORM 200-2-35

P.O.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712/1-800-464-7419 - S.C. 7474 FAX 1-808-819-7319

# CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-96

INSURED [REDACTED]

CLAIMANT

PICTURE NO. 7

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF TR

FRONT AREA

COMMENTS



PICTURE NO.

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

PASSENGER AREA AS

COMMENTS VIEWED FROM THE

WINDSHIELD AREA

OUR FILE NO.

COMPANY CLAIM NO.

2002-025-0 1503

P.G.S. FORM 200-2-95

P.G.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712/1-800-484-7419 - S.C. 7474 FAX 1-808-919-7310

CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-96

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 9

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

PASSENGER AREA AS

COMMENTS VIEWED FROM THE

REAR WINDOW AREA



PICTURE NO. 10

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

PASSENGER AREA AS

COMMENTS VIEWED FROM THE

INSTRUMENT PANEL

AREA AS VIEWED FROM

THE LEFT SIDE

OUR FILE NO.

COMPANY CLAIM NO.

BP22-025-B 1504

P.G.S. FORM 200-2-95

P.G.S. INDUSTRIES, P.O. BOX 1948, ASBURY PARK, NJ 07712/1-800-484-7419 - S.C. 7474 FAX 1-800-919-7319

CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-96

INSURED [REDACTED]

CLAIMANT

PICTURE NO. 11

DATE/TIME TAKEN 02-10-97

BY PHILIP W. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

INSTRUMENT PANEL AREA

COMMENTS AS VIEWED FROM

THE RIGHT SIDE



PICTURE NO. 12

DATE/TIME TAKEN 02-10-97

BY PHILIP W. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

FRONT PASSENGER

COMMENTS COMPARTMENT AS

VIEWED FROM THE LEFT

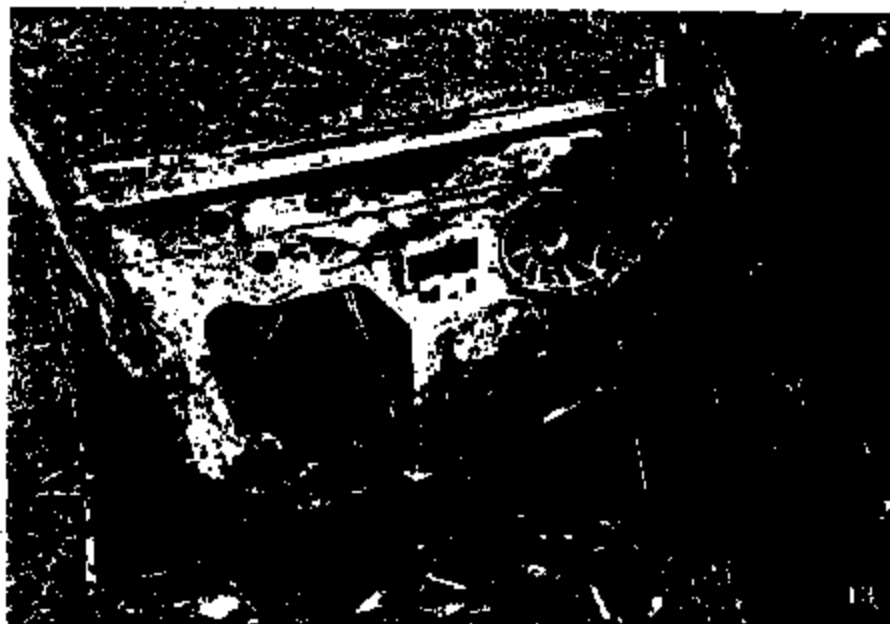
FRONT DOOR

OUR FILE NO.

COMPANY CLAIM NO.

ERG2-025-B 1585

# CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-24-96

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 10

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

BURN/HEAT EXPOSURE

COMMENTS PATTERNS ON THE

INNER PANEL OF THE

LEFT FRONT DOOR

PICTURE NO. [REDACTED]

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

COMMENTS REAR PASSENGER AREA

AS VIEWED FROM

THE LEFT REAR WINDOW

OUR FILE NO. [REDACTED]

COMPANY CLAIM NO. [REDACTED]



EP02-025-B 1509

P.O.S. FORM 200-2-95

P.O.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712/1-800-484-7419 - B.C. 7474 FAX 1-808-818-7319

# CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-95

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 15

DATE/TIME TAKEN 02-10-97

BY PHILIP M. KENNEDY, S.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

FRONT PASSENGER AREA

COMMENTS AS VIEWED FROM  
THE RIGHT FRONT DOOR



PICTURE NO. 16

DATE/TIME TAKEN 02-10-97

BY PHILIP M. KENNEDY, S.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

BURN/HEAT EXPOSURE

COMMENTS PATTERNS ON THE

INNER PANEL OF THE

RIGHT FRONT DOOR

OUR FILE NO.

COMPANY CLAIM NO.

EP02-025-B 1587

R.G.S. FORM 200-2-88

R.G.S. INDUSTRIES, P.O. BOX 1348, ARBURY PARK, NJ 07712/1-800-484-7418 - S.C. 7474 FAX 1-908-619-7319

# CLICK'N STICK PHOTO STATIONERY



POLICY

DATE/LOSS 10-20-96

INSURED

CLAIMANT

PICTURE NO. 17

DATE/TIME TAKEN 02-10-97

BY PHILIP W. KENNEDY, SP

WEATHER CLOUDY

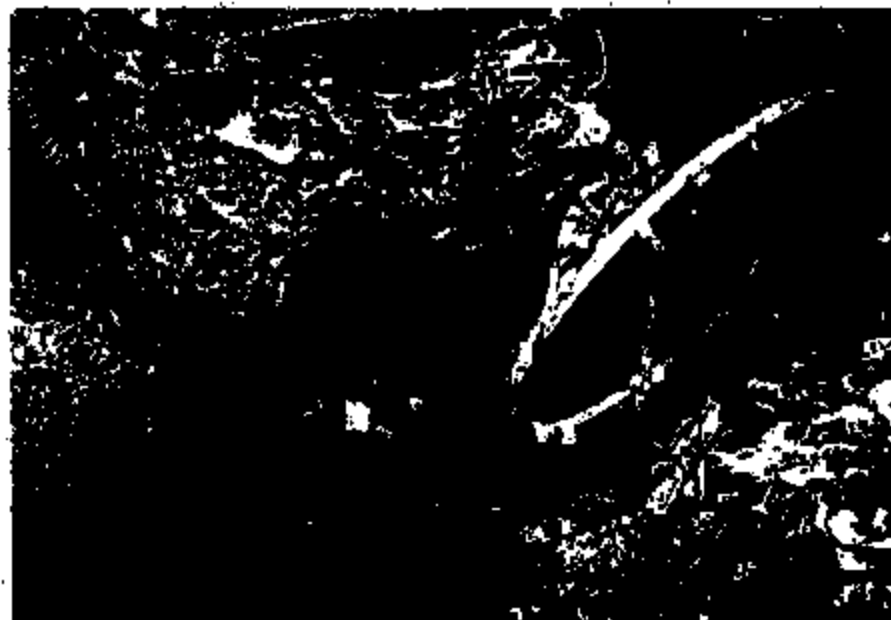
LOCATION AND VIEW VIEW OF THE

REAR PASSENGER AREA

COMMENTS AS VIEWED FROM

THE RIGHT REAR

WINDOW



PICTURE NO.

DATE/TIME TAKEN 02-10-97

BY PHILIP W. KENNEDY, SP

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

INSTRUMENT CLUSTER

COMMENTS AREA AS VIEWED

FROM THE LEFT SIDE

OUR FILE NO.

COMPANY CLAIM NO.

ERG2-825-8 1588



# CLICK'N STICK PHOTO STATIONERY



POLICY

DATE/LOSS 10-30-96

INSURED

CLAIMANT

PICTURE NO. 19

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SP

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF IF

INSTRUMENT CLUSTER

COMMENTS AREA AS VIEWED

FROM THE LEFT SIDE



PICTURE NO.

DATE/TIME TAKEN 20

BY 02-10-97

WEATHER PHILIP N. KENNEDY, SP

LOCATION AND VIEW CLOUDY

VIEW OF THE

LEFT LOWER AREA OF

COMMENTS THE INSTRUMENT

PANEL AS VIEWED FROM

THE LEFT SIDE

OUR FILE NO.

COMPANY CLAIM NO.

8002-825-8 1880

P.O.S. FORM 200-2-38

P.O.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712/1-800-484-7419 - S.C. 7474 FAX 1-808-919-7319

CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-95

INSURED [REDACTED]

CLAIMANT

PICTURE NO. 21

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

CENTER AREA OF THE

COMMENTS INSTRUMENT PANEL

AS VIEWED FROM THE

LEFT SIDE

PICTURE NO. 22

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

INSTRUMENT PANEL AS

COMMENTS VIEWED FROM THE

RIGHT FRONT DOOR

OUR FILE NO.

COMPANY CLAIM NO.

EP62-625-5 1518

P.G.S. FORM 200-2-85

P.G.S. INDUSTRIES, P.O. BOX 1548, ASBURY PARK, NJ 07712/1-800-484-7419 - S.C. 7474 FAX 1-800-919-7319

# CLICK'N STICK PHOTO STATIONERY



POLICE

DATE/LOSS 10-10-96

INSURED

CLAIMANT

PICTURE NO. 23

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

INSTRUMENT CLUSTER AS

COMMENTS VIEWED FROM THE

DRIVERS SEAT

PICTURE NO.

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

INSTRUMENT CLUSTER AS

COMMENTS VIEWED FROM THE

DRIVERS SEAT

OUR FILE NO.

COMPANY CLAIM NO.

ENR2-025-3 1511

# CLICK'N STICK PHOTO STATIONERY



POLICY

DATE/LOSS 10-20-96

INSURED

CLAIMANT

PICTURE NO. 25

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

INSTRUMENT CLUSTER A.

COMMENTS VIEWED FROM THE

DRIVERS SEAT

PICTURE NO.

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

REAR OF THE

COMMENTS INSTRUMENT

CLUSTER PANEL

OUR FILE NO.

COMPANY CLAIM NO.

ENR2-025-B 1512

P.G.S. FORM 200-2-95

P.G.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712/1-800-484-7418 - B.C. 7474 FAX 1-808-819-7319

# CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-96

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 27

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SF

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

FIRE DAMAGED FUSE

COMMENTS BLOCK ON THE

LEFT LOWER SIDE OF

THE INSTRUMENT PANEL

PICTURE NO. 28

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SF

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

FIRE DAMAGED REMAINS

COMMENTS TO THE LOCKED

CYLINDER HOUSING

JUST BELOW THE

STEERING WHEEL

OUR FILE NO.

COMPANY CLAIM NO.

EP02-028-B 1513

P.O.S. FORM 200-0-35

P.B.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712-1348 - S.C. 7474 FAX 1-908-919-7319

# CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]  
 DATE/LOSS 10-30-96  
 INSURED [REDACTED]

CLAIMANT \_\_\_\_\_

PICTURE NO. 29

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY,

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF  
 ACTUATOR HOUSING

COMMENTS \_\_\_\_\_

PICTURE NO. 30

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY,

WEATHER CLOUDY

LOCATION & VIEW VIEW OF T  
 ACTUATOR HOUSING

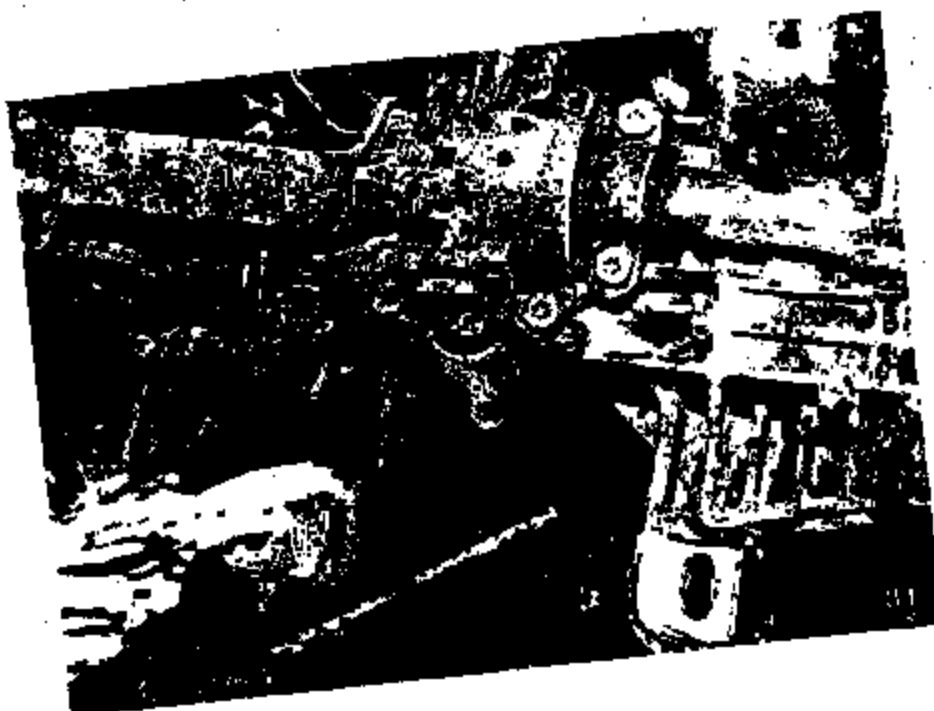
COMMENTS THE STEERING  
 SHAFT ASSEMBLY

OUR FILE NO. \_\_\_\_\_

COMPANY CLAIM NO. \_\_\_\_\_

EP02-025-B 1514

CLICK 'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-96

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 31

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, S

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF T

ACTUATOR HOUSING AS

COMMENTS VIEWED WITH THE

HOUSING DETACHED

FROM THE FRAME

PICTURE NO. 32

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, S

WEATHER CLOUDY

LOCATION & VIEW VIEW OF THE

ACTUATOR HOUSING AS

COMMENTS VIEWED DETACHED

FROM THE FRAME

OUR FILE NO. [REDACTED]

COMPANY CLAIM NO. [REDACTED]



EP02-025-0 1515

P.G.S. FORM 200-2-35

P.G.S. INDUSTRIES, P.O. BOX 1348, ASBURY PARK, NJ 07712/1-800-919-0707 FAX 1-800-919-7319

CLICK'N STICK PHOTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS 10-20-96

INSURED [REDACTED]

CLAIMANT

PICTURE NO. 33

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE  
ENGINE COMPARTMENT

COMMENTS AS VIEWED FROM  
THE FRONT

PICTURE NO. 34

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION & VIEW VIEW OF THE  
ENGINE COMPARTMENT

COMMENTS AS VIEWED FROM  
THE LEFT SIDE

OUR FILE NO.

COMPANY CLAIM NO.

ERR2-828-B 1518



CLICK'N STICK PHOTO STATIONERY



POLICE [REDACTED]

DATE/LOSS [REDACTED]

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 35

DATE/TIME TAKEN 02-10-97

BY PHILIP M. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE

FIRE DAMAGE TO THE

COMMENTS FRONT OF THE

ENGINE COMPARTMENT

AS VIEWED FROM THE

LEFT SIDE



PICTURE NO. 36

DATE/TIME TAKEN 02-10-97

BY PHILIP M. KENNEDY, SR.

WEATHER CLOUDY

LOCATION & VIEW VIEW OF THE

FIRE DAMAGE TO THE

COMMENTS REAR OF THE

ENGINE COMPARTMENT

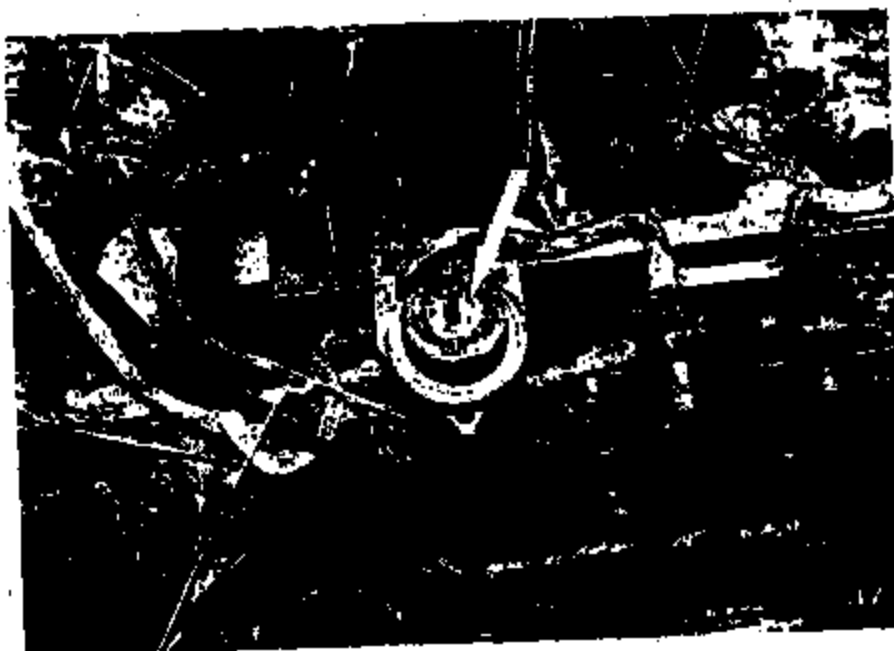
AS VIEWED FROM THE

LEFT SIDE

OUR FILE NO. [REDACTED]

COMPANY CLAIM NO. [REDACTED]

CLICK'N STICK AUTO STATIONERY



POLICY NO. [REDACTED]

DATE/LOSS [REDACTED]

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 37

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE  
FUEL PRESSURE

COMMENTS REGULATOR (ARROW)

PICTURE NO. 38

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION & VIEW VIEW OF THE  
FIRE DAMAGE TO THE

COMMENTS LEFT SIDE OF THE  
ENGINE AS VIEWED FROM  
THE LEFT FRONT

OUR FILE NO. [REDACTED]

COMPANY CLAIM NO. [REDACTED]



P.O. FORM 200-2-35

P.S. INDUSTRIES, INC. BOX 1348, ABBURY PARK, NJ 07712/1-800-919-0707 FAX 1-800-919-7319

8902-025-B 1518

CLICK'N STICK PHOTO STATIONERY



POLIC [REDACTED]

DATE/TIME 10-20-96

INSURED [REDACTED]

CLAIMANT [REDACTED]

PICTURE NO. 39

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE  
ENGINE COMPARTMENT

COMMENTS AS VIEWED FROM  
THE RIGHT SIDE

PICTURE NO. 40

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR

WEATHER CLOUDY

LOCATION & VIEW VIEW OF THE  
FIRE DAMAGE TO THE

COMMENTS FRONT OF THE  
ENGINE AS VIEWED FROM  
THE RIGHT SIDE

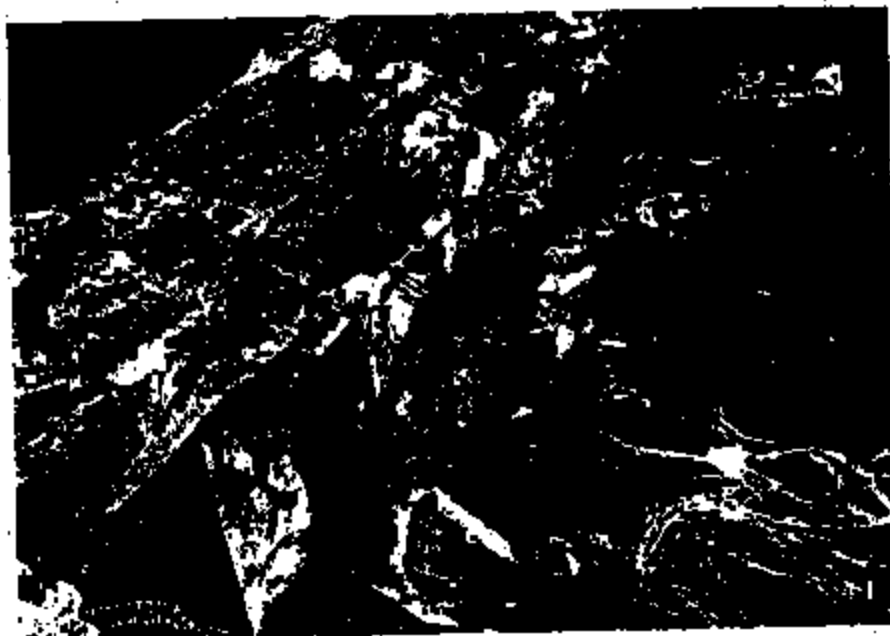
OUR FILE NO. [REDACTED]

COMPANY CLAIM NO. [REDACTED]



ENR2-020-5 1519

CLICK'N STICK PHOTO-STATIONERY



POLICY

DATE/LOSS 10-20-96

INSURED

CLAIMANT

PICTURE NO. 41

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION AND VIEW VIEW OF THE  
FIRE DAMAGE TO THE

COMMENTS REAR OF THE  
ENGINE AS VIEWED FROM  
THE RIGHT SIDE

PICTURE NO. 42

DATE/TIME TAKEN 02-10-97

BY PHILIP N. KENNEDY, SR.

WEATHER CLOUDY

LOCATION & VIEW VIEW OF THE  
FIRE DAMAGED REMAINS

COMMENTS OF THE POWER  
DISTRIBUTION PANEL, ON  
THE RIGHT SIDE OF THE  
ENGINE COMPARTMENT

OUR FILE NO.

COMPANY CLAIM NO.



Policy No. [REDACTED]  
Amount of Policy at time of loss [REDACTED]  
Date Issued 6-14-96  
Date Expires 6-14-97

# Bankers Insurance Group

## Sworn Statement in Proof of Loss

File No. B96-31232-42  
Company Claim No. [REDACTED]  
Agent POBior 14519  
Agency at 5000 S. Dade Beach

To the [REDACTED]  
of St. Petersburg FL  
At time of loss, by the above indicated policy of insurance, you insured  
1942 S. Waccamaw Dr  
Garden City, SC

against loss by physical damage to the property described according to the terms and conditions of said policy and of all forms, endorsements, transfers and assignments attached thereto.

Time and Origin A Fire loss occurred about the hour of 10 PM o'clock 1/2 on the 01st day of 1996  
the cause and origin of the said loss were: 1st Lincoln Town Car

Occupancy The building described, or containing the property described, was occupied at the time of the loss as follows, and for no other purpose whatsoever: DWELLERS + guests

Title and Interest At the time of the loss, the interest of your insured in the property described therein was 100% No other person or persons had any interest therein or encumbrance, thereon, except W/ Mrs. J. W. Parks  
Greater personal items

Changes Since the said policy was issued, there has been no assignment thereof, or change of interest, use, occupancy, possession, location or exposure of the property described, except: No Assignment or Change

Other Insurance Is there any insurance in force covering this property other than the policy with this Company?  
If so, give name of company, policy number and amount: J. C. Wind & Hail  
Nat. Flood - Personal items on home owners

Total Insurance THE TOTAL AMOUNT OF INSURANCE upon the property described by this policy was, at the time of the loss, \$ 100,000 as more particularly specified in the apportionment attached, besides which there was no policy or other contract of insurance, written or oral, valid or invalid.

Value THE ACTUAL CASH VALUE of said property at the time of the loss was Building Only 100,000

Loss THE WHOLE LOSS AND DAMAGE WAS Building Only 100,000

Amount Claimed THE AMOUNT CLAIMED under the above numbered policy is Building Only 100,000

Statements of Insured The said loss did not originate by any act, design or procurement on the part of your insured, or this agent, nothing has been done by or with the privy or consent of your insured or this agent, in violation of the conditions of the policy, or render it void; no articles are mentioned herein or in attached schedules but such as were destroyed or damaged at the time of said loss, no property saved has in any manner been concealed, and no attempt to deceive the said company, as to the extent of said loss, has in any manner been made. Any other information that may be required will be furnished and considered a part of this proof.

The furnishing of this blank or the preparation of proofs by a representative of the above insurance company is not a waiver of any of its rights.

State of Georgia  
County of Cobb

Subscribed and sworn to before me this 24th day of January 19 97

Any person who knowingly and with intent to injure, defraud, or deceive any insurer files a statement of claim or an application containing any false, incomplete, or misleading information is guilty of a felony of the third degree. (Florida Statute §17.234(1)(b))

[Signature]  
Notary Public  
My Commission Expires Oct. 10, 1999



# James C. Greene Company

A CORPORATION  
Insurance Adjusters - All Lines

Address Reply to

PO Box 1291  
Myrtle Beach, SC 29578  
Phone: (803) 449-4402  
Fax: (803) 449-4865

November 20, 1996

Bankers Insurance Company  
PO Box 15707  
St. Petersburg, FL 33733

ATTN: Stephanie McGee

RE: Insured : [REDACTED]  
Claim # : [REDACTED]  
D/Loss : 10-29-96  
Our File# : [REDACTED]

42

North Carolina  
Atlanta  
Charlotte  
Columbia  
Dallas  
Denver  
Detroit  
Houston  
Jacksonville  
Los Angeles  
Miami  
Memphis  
Minneapolis  
New York  
Oklahoma City  
Phoenix  
Portland  
Raleigh  
Richmond  
San Antonio  
San Diego  
Seattle  
Tampa  
Washington  
Wichita  
Winston-Salem

**ENCLOSURES:**

- 1) Real Estate specs
- 2) Photos
- 3) Service invoice

**ASSIGNMENT:** Received directly from your office on 11-5-96.

**COVERAGE/RISK:** Coverage is reported in the amount of \$100,000.00 on the dwelling only on Form DP3. The risk is an elevated frame dwelling situated at 1942 S. Waccamaw Drive, Garden City, S.C.

**ORIGIN:** This fire occurred at or about 1:00 AM and in speaking with the Garden City Fire Department, was caused by the insured's vehicle parked under the house, catching on fire and setting the house on fire. According to the Fire Department, there are eyewitnesses who observed the automobile, belonging to the insured, burst into flames after the insured's wife pulled under the house and parked. The insured was in the house at the time.

**ADJUSTMENT:** We have inspected this dwelling and found it to be a total loss. We cannot get upstairs to get room measurements as the flooring and stairs are burned through. All of the interior is burned out as well as the attic and roof.

We have attempted to make contact with the insured but have been unable to reach him by phone. We have written him at the address in Marietta, Georgia, but have had no response. The only phone number we had was for another house he owns here at the beach and there is no answering machine at this number. We have been calling a number in Marietta but get

Home Office P.O. Box 2128 • Raleigh, N.C. 27611 • (919) 832-6644 • S.C. State Office P.O. Box 446 • Columbia, S.C. 29201 • (803) 771-8520  
FAX to North Carolina (919) 832-6675 • FAX to South Carolina (803) 264-2799

*The Greene Insurance Company*

TOTAL P.01

8062-025-B 1822

November 19, 1996

St. Petersburg, FL  
Attn: Heidi Shapter

Claim Number

De

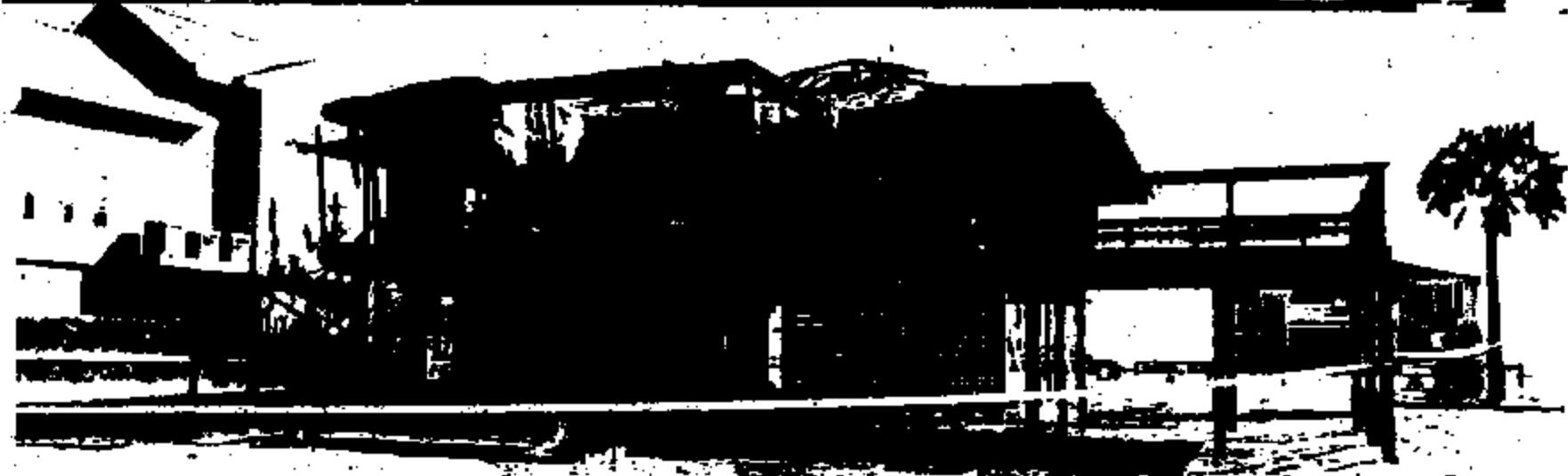
I have included a copy of the Fire report, the Car insurance and a set of pictures showing the house after the fire. I hope this is sufficient, if not please contact me or my father at the addresses below. Thank you for your help in this matter.

Sincerely,

Thomas M. Rose

Thomas M. Rose  
535 Amberidge Trail  
Atlanta, GA 30328  
(404) 851-9297

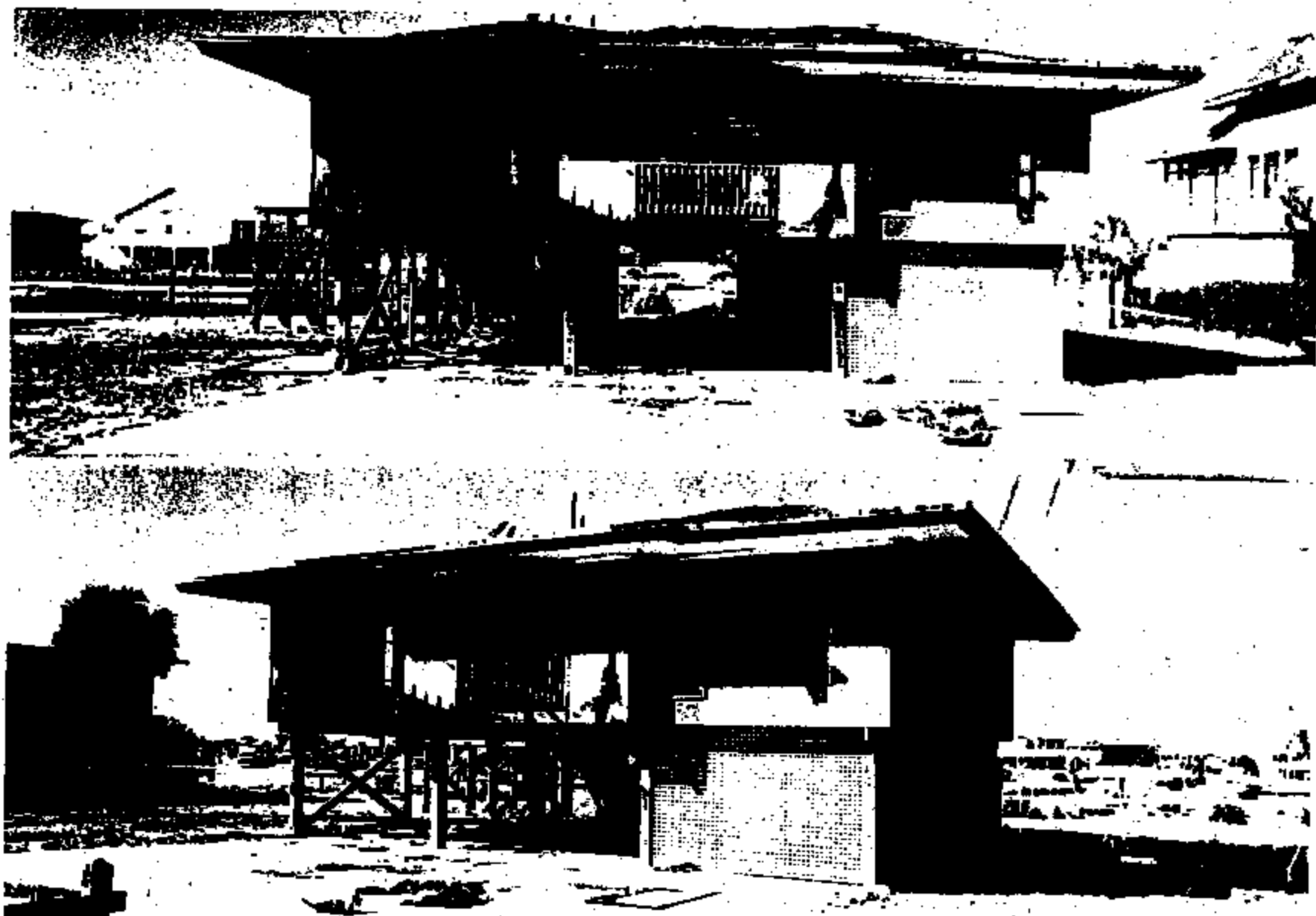
A. McKoy Rose Jr. M.D.  
201 Whitlock Ave.  
Marietta, GA 30064  
(770) 428-6629



ENCLOSURE 1







DP-2-425-1 1828



2000-02-1 10:20





ER02-025-0 1031



**James C. Greene Company**  
A CORPORATION  
Insurance Adjusters • All Lines

November 20, 1996

*Address Reply to*

PO Box 1291  
Myrtle Beach, SC 29578  
Phone: (803) 449-4402  
Fax: (803) 449-4865

**Hankara Insurance Company**  
PO Box 15707  
St. Petersburg, FL 33733

ATTN: Stephanie McGee

RE: Insured [REDACTED]  
Claim # [REDACTED]  
D/Loss : 10-29-96  
Our File# [REDACTED]

**ENCLOSURES:**

- 1) Real Estate specs
- 2) Photos
- 3) Service invoice

**ASSIGNMENT:** Received directly from your office on 11-5-96.

**COVERAGE/RISK:** Coverage is reported in the amount of \$100,000.00 on the dwelling only on Form DP3. The risk is an elevated frame dwelling situated at 1942 S. Waccanaw Drive, Garden City, S.C.

**ORIGIN:** This fire occurred at or about 1:00 AM and in speaking with the Garden City Fire Department, was caused by the insured's vehicle parked under the house, catching on fire and setting the house on fire. According to the Fire Department, there are eyewitnesses who observed the automobile, belonging to the insured, burst into flames after the insured's wife pulled under the house and parked. The insured was in the house at the time.

**ADJUSTMENT:** We have inspected this dwelling and found it to be a total loss. We cannot get upstairs to get room measurements as the flooring and stairs are burned through. All of the interior is burned out as well as the attic and roof.

We have attempted to make contact with the insured but have been unable to reach him by phone. We have written him at the address in Marietta, Georgia, but have had no response. The only phone number we had was for another house he owns here at the beach and there is no answering machine at this number. We have been calling a number in Marietta but get

Home Office P.O. Box 25306 • Raleigh, N.C. 27611 • (919) 832-6634 • S.C. State Office P.O. Box 616 • Columbia, S.C. 29201 • (803) 771-4820  
FAX in North Carolina (919) 832-6620 • FAX in South Carolina (803) 294-2900

*Let Greene in the Carolinas*

ER02-025-B 1532

Bankers Insurance Company

November 20, 1996

Page 2

RE: AMF [REDACTED]

AMF [REDACTED]

no answer and this number has no answering machine either.

We have managed to obtain a copy of the sales specs on this house as it was just purchased by the insured. The sale price was \$386,000.00. The dwelling specs are listed and according to this, the home was 1,572 sq ft of heated area in size, plus decks and downstairs storage and work room.

On a square foot building cost at an average of \$75.00 per sq ft on the beach area, the replacement cost to rebuild would be \$117,900.00, plus the decks, downstairs storage and stairs, tear out and debris removal. This would amount to another \$25,000.00/30,000.00, which would greatly exceed the \$100,000.00 coverage even after depreciation if it were applicable. As you will see from the enclosed photos, the home is a total loss.

SUBROGATION: It is our understanding that a late model Lincoln owned by the insured caught fire and set the dwelling on fire. Since we have not been able to talk to the insured, we don't know if subrogation is a possibility or not.

SALVAGE: None.

REMARKS: We have not prepared an item by item detailed repair estimate as we have not been able to determine the materials used inside (ie; paneling, wallpaper, etc., or appliances built in). Under the circumstances, we do not feel that this is necessary as the average sq ft cost greatly exceeds the limit of liability, however, if you wish for us to do so, we will.

We have also spoken to the Fire Chief and there is nothing suspicious surrounding this fire. They are to mail us a copy of their report when it is complete. We will forward same to you.

FUTURE ACTIVITY: As it appears we can be of no further service, we are closing our file in this regard. If there is anything else you may need, please advise and we will comply.

Bankers Insurance Company  
November 20, 1996  
Page 3  
RE: [REDACTED]

Regards,

JAMES C. GREENE CO.

*Ron Mathews*

Ron Mathews  
Property Adjuster

RM/lag



# PHOTO IDENTIFICATION SHEET



Policy No. [REDACTED]  
 Insured [REDACTED]  
 Claimant [REDACTED]  
 Date Loss 10/20/81  
 Picture No. \_\_\_\_\_  
 Film ☒ Polaroid ☐ 35 mm  
 Date/Time Taken 7  
 By Tom W. [unclear]  
 Direction Camera Pointed \_\_\_\_\_  
 Location & Comments Fire destr.  
Roofs



Picture No. 2  
 Date/Time Taken \_\_\_\_\_  
 By \_\_\_\_\_  
 Direction Camera Pointed \_\_\_\_\_  
 Location & Comments Fire  
damage - 10/20  
loss



Picture No. 3  
 Date/Time Taken \_\_\_\_\_  
 By \_\_\_\_\_  
 Direction Camera Pointed \_\_\_\_\_  
 Location & Comments Fire damage  
total loss



# PHOTO IDENTIFICATION SHEET

Policy/Claim No. 096-103-252

Insured \_\_\_\_\_

Claimant \_\_\_\_\_

Date Lost 10/20/00

Picture No. 4

Film [1 Polaroid 135 mm]

Date/Time Taken \_\_\_\_\_

By Ken White

Direction Camera Pointed \_\_\_\_\_

Location & Comments Fire damage



Picture No. 5

Date/Time Taken \_\_\_\_\_

By \_\_\_\_\_

Direction Camera Pointed \_\_\_\_\_

Location & Comments Fire damage



Picture No. 6

Date/Time Taken \_\_\_\_\_

By \_\_\_\_\_

Direction Camera Pointed \_\_\_\_\_

Location & Comments Fire damage



# PHOTO IDENTIFICATION SHEET

Pol. Claim No. 44 663 122

insured Phil Jackson

**Client:** \_\_\_\_\_

Date Lost 10/10/56

Figure No. 7

Film ☐ Polaroid ☐ 35 mm

Date/Time Taken 11-11-11 11:11

By Karen H. Hartz

**Direction Camera Pointed**\_\_\_\_\_

Location & Comments East Avenue



Picture No. \_\_\_\_\_

Date/Time Taken \_\_\_\_\_

By \_\_\_\_\_

**Direction Camera Focused** \_\_\_\_\_

Location & Comments: *Five (four)*

Figure No. \_\_\_\_\_

**Date/Time Taken** \_\_\_\_\_

By \_\_\_\_\_

**Direction Camera Pointed** \_\_\_\_\_

Location &amp; Comments \_\_\_\_\_

ARM (CIRCLE ONE): ACTUAL FIRE - MALICIOUS - UNINTENTIONAL - DEVICE/SYSTEM MALFUNCTION  
RESCUE/EMERGENCY (CIRCLE ONE): 10-50 - MUTUAL AID - OTHER: \_\_\_\_\_

FIRE (CIRCLE ONE):

STRUCTURAL: SINGLE FAM RES - MULTI FAM RES - DUPLEX - CONDO - TOWN HOUSE -  
MOBILE HOME - COMMERCIAL - OTHER: \_\_\_\_\_

VEHICLE: AUTO - SMALL TRUCK - LARGE TRUCK - AIRCRAFT - BOAT - OTHER: \_\_\_\_\_

ORGANIC: GRASS - BRUSH - WOODS - RUBBISH - OTHER: \_\_\_\_\_

HAZARDOUS MATERIALS INCIDENT (CIRCLE ONE):

POTENTIAL - SPILL/RELEASE - FIRE - EXPLOSION - 10-50 - OTHER: \_\_\_\_\_

TYPE OF PRODUCT (CIRCLE ONE):

EXP - GAS - FLAM/COMB LIQ - FLAM SOL - OXI - POI - RAD - COR - OTHER: \_\_\_\_\_

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

CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP: \_\_\_\_\_

MAKE OF VEHICLE: \_\_\_\_\_ VIN: \_\_\_\_\_

INSURANCE CO.: \_\_\_\_\_ RACE: C - B - I - H - A - OTHER: \_\_\_\_\_

ESTIMATED LOSS: STRUCTURAL CONTENTS VEHICLES

INSURED LOSS \$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

UNINSURED LOSS \$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

GALLONS OF WATER FLOWED: \_\_\_\_\_ HYDRANT NO. \_\_\_\_\_ COUNTY: HOBBS - GEORGETOWN

REMARKS BY ENGINEER: \_\_\_\_\_

ENGINE(S) CHECKED AND READY FOR SERVICE - ENGR. NO. \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

INCIDENT COMMANDER SUMMARY: We arrived on scene to find house on fire. Car under house was actively burning. Exterior attack was made with hard line. When water supply was established with hydrant, a deck gun was used through front door and window. Interior attack was made with hard line but crew was pulled from house as ceiling began to fall in. Exterior attack was continued with hard lines and deck gun. Tower operation was deployed from ladder pipe. (See sheet #2)

INCIDENT COMMANDER SIGNATURE (D. Linn)

FUNCTION

# Murrells Inlet - Garden City Fire District

Post Office Box 48  
Murrells Inlet, South Carolina 29576  
Phone (803) 681-6143

INCIDENT REPORT

Date: 10/29/76

EVENT STRUCTURE FIRE

NAME: [REDACTED]

ADDRESS [REDACTED]

TELEPHONE [REDACTED]

NARRATIVE

The structure was determined to be a total loss. There was one minor firelight coming from a pulled muscle. No lost time from fire. Car was towed and impounded by Co. County Auto Towing with permission from owner.

D. D. Dussin

INSURED VALUE \$100,000

Auto: 1992 LINCOLN TOWN

Marietta, Ga. [REDACTED]

VALUE \$15,000

LC # 6A, R80-378

OWNER STAYING AT 1904 ROMANO PL. [REDACTED]

DUTY OFFICER REPORT

Home Ph. [REDACTED]

\*\* IF YOU NEED MORE ROOM PLEASE ATTACH ANOTHER SHEET. \*\*

F-118

2002-025-5 1540

# Muriel's Inlet - Garden City Fire Department

 INCIDENT NUMBER 1002

10-21

 DATE: 10/29/96 TIME: 1317 ALARM TIME: 1318 DUTY COMPANY: C-5 H.F.

 LOCATION: 1942 S. Waccamaw Dr. Garden City

CALL BACK NUMBER: \_\_\_\_\_ CALLER'S NAME: \_\_\_\_\_

| UNIT#  | E-1 | E-2  | E-3 | E-4 | E-5  | T-1  | ST-8 | C-1  | C-2  | C-11 | T-9 |
|--------|-----|------|-----|-----|------|------|------|------|------|------|-----|
| 10-8   |     | 1316 |     |     | 1318 | 1326 |      | 1319 | 1318 |      |     |
| 10-23  |     | 1324 |     |     | 1322 | 1330 |      | 1326 | 1323 |      |     |
| 10-24  |     | 1630 |     |     | 1633 | 1633 |      | 1641 | 1613 |      |     |
| 10-10  |     | 1630 |     |     | 1633 | 1633 |      | 1641 | 1613 |      |     |
| DRIVER |     | E-12 |     |     | E-12 | E-55 | 55   | C-1  | C-2  |      | E-2 |

 DUTY OFFICER: C-2 SIGNAL 5: \_\_\_\_\_ INCIDENT COMMANDER: C-1

## COMPANY A

## COMPANY B

## COMPANY C

### OFFICERS

 C-05 J. RAUSCHKOLE J.P. C-04 A. SIFE X C-06 L. HOPKINS V

### ENGINEERS

|                                        |                              |                                 |
|----------------------------------------|------------------------------|---------------------------------|
| E-14 N. JULIANO* <u>N.J. (10-28)</u>   | E-21 J. RICHNAFSKY* <u>X</u> | E-12 J. DANIELS* <u>J.D.</u>    |
| E-26 J. CHANEY* <u>J.C. (10-18)</u>    | E-17 M. CIRACO* <u>X</u>     | E-16 R. JEWETT* <u>R.J.</u>     |
| E-23 A. FRITCHARD* <u>A.F. (10-28)</u> | E-13 R. RHOADES* <u>X</u>    | E-38 N. BEAUREGARD* <u>N.B.</u> |
| E-19 T. MORRISON <u>X</u>              | E-55 B. DEIGHAN <u>B.D.</u>  | D-42 C. INGULLI <u>C.I.</u>     |
|                                        | D-29 G. ROBINSON <u>G.R.</u> |                                 |

### FIREFIGHTERS

|                                |                              |                               |
|--------------------------------|------------------------------|-------------------------------|
| F-39 P. WALSH <u>X</u>         | F-36 R. CARTER <u>X</u>      | F-35 E. MEEHAN <u>S.M.</u>    |
| F-28 A. MASSERBEAU <u>A.M.</u> | F-25 H. FRITCHARD <u>X</u>   | F-27 T. BLOOMDAHL <u>T.B.</u> |
| F-34 R. SARVIS <u>X</u>        | F-49 D. ANDERSON <u>D.A.</u> | F-40 D. BROWN <u>X</u>        |
| F- _____                       | F-32 J. ELLIOTT <u>J.E.</u>  | F-46 D. STOCKTON <u>D.S.</u>  |
| F- _____                       | F-53 D. DIBONG <u>D.D.</u>   | F-31 K. BITTNER <u>X</u>      |
| F- _____                       | F- _____                     | F- _____                      |
| F- _____                       | F- _____                     | F- _____                      |
| F- _____                       | F- _____                     | F- _____                      |

### SERVICE COMPANY

|                             |                            |                           |
|-----------------------------|----------------------------|---------------------------|
| T-25 R. DODD <u>R.D.</u>    | T-60 B. WILSON <u>B.W.</u> | T-30 V. SMITH <u>V.S.</u> |
| T-48 L. SPRAGUE <u>L.S.</u> | T- _____                   | T- _____ <u>X</u>         |

### ADMINISTRATIVE DIVISION

 CAR 1 CHIEF SMITH\* C.S. CAR 2 A.C. LUSSIER\* A.L. INSP II P.T. MOCARSKI\* P.M.

\* DENOTES PAID EMPLOYEES

 TOTAL PERSONNEL 24

Bak-25.32-42

## ACORN. PROPERTY LOSS NOTICE

NOV 01 1996

DATE (MM/DD/YY)

10-29-96

PRODUCER

PRODUCER (NAME, ADDRESS, CITY, STATE, ZIP)

NECESSARY INFORMATION (HOW &amp; WHEN OBTAINED)

Surfside Beach SC

Bankers

POLICY NO.

CAT. 2

LOSS

LOSS CODE

POLICY EFF. DATE (MM/DD/YY)

POLICY EXP. DATE (MM/DD/YY)

DATE (MM/DD/YY) &amp; TIME OF LOSS

PROPERTY

6-14-96

6-14-97

10-29-96

A.M.

P.M.

YES

NO

INSURED

NAME AND ADDRESS

INSURED'S RESIDENCE PHONE (A/C, No., Ext.)

INSURED'S BUSINESS PHONE (A/C, No., Ext.)

AMR Partners, LP  
 AMR Holdings INC  
 GP By A M & KRY RAGS, Pres  
 201 Whitlock Ave  
 Marietta Ga 30064

INSURED'S RESIDENCE PHONE (A/C, No., Ext.)

80 454-9508

NUMBER TO CONTACT

NAME

CONTACT'S BUSINESS PHONE (A/C, No., Ext.)

CONTACT'S BUSINESS PHONE (A/C, No., Ext.)

LOSS

LOCATION OF LOSS

1942 S. Waccamaw Dr, Garden City

TYPE OF LOSS (FIRE, THEFT, BURGLARY, ETC.)

POSSIBLE AMOUNT ENTIRE LOSS

DESCRIPTION OF LOSS &amp; DAMAGE (If owner did, if necessary)

Mrs Rose drove car under house, got out, went into house, car caught on fire & house caught on fire

POLICY INFORMATION

NOMINATION OF BENEFICIARY (if any)

HOMEOWNERS POLICIES SECTION 1 ONLY (Complete for coverages A, B, C, D &amp; additional coverages. For Homeowners Section 2 Liberty Loans, use ACORN 2.)

COVERAGE A

COVERAGE B

COVERAGE C

COVERAGE D

DESIGNEE ADDITIONAL COVERAGES PROVIDED

DWELLING

APPLIANCE

ELECTRONICS

JEWELRY

300,000

OR

liab

100,000

5000

OR

med pay

SUBJECT TO POLICY. Amount from loss &amp; other coverages, special deductibles

DEDUCTIBLE

500

FIRE, ALLIED LOSS &amp; BURGLARY POLICIES (Complete only when loss insured in loss)

ITEM AMOUNT S.D. CONTENTS OTHER LOSS DEDUCTIBLE COVERAGE AND / OR DESCRIPTION OF PROPERTY INSURED

SUBJECT TO POLICY. Amount from loss &amp; other coverages, special deductibles

NECESSARY INFORMATION

OTHER INSURANCE (If applicable, policy number, coverage &amp; policy amount)

SCWHUA #30765 100,000

Bankers #390007437580 100,000

REMARKS

ER02-025-8 1542

ADJUSTER APPROVED

DATE ADJUSTER (MM/DD/YY)

REPORTED BY

REPORTED TO

FILE &amp; TIME OF FILING (MM/DD/YY)

ORIGINAL FILED

IN THE UNITED STATES DISTRICT COURT JUL 23 1999

FOR THE DISTRICT OF SOUTH CAROLINA HARRY W. PROPER, CLERK  
FLORENCE, S.C.

FLORENCE DIVISION

BANKERS INSURANCE COMPANY )  
AS SUBROGEE OF AMR PARTNERS, LP )  
AND AMR PARTNERS, LP, )

Plaintiff(s), )

-versus- )

FORD MOTOR COMPANY, )

Defendant. )

CIVIL ACTION NO. 99-2457-2

COMPLAINT FOR DAMAGES

COME NOW YOUR PLAINTIFFS and bring their Complaint for Damages against the Defendant Ford Motor Company ("Ford") named above the Court as follows:

GENERAL ALLEGATIONS

Nature of the Action

1. This is a product liability action claiming damages for property loss, and punitive damages. The claims asserted herein arise out of design, inspection, testing, manufacture, assembly, marketing, distribution, and sale of a defective and unreasonably dangerous motor "vehicle".

Parties, Jurisdiction and Venue

2. At all times complained of, the Plaintiff(s) are Bankers Insurance Company and AMR Partnership, LP.

3. Defendant Ford, is a corporation organized and existing under the laws of the State of Delaware, having its principal place of business in the state of Michigan.



4. At all material times Ford was and is a foreign corporation authorized to do business, and doing business, in South Carolina.

5. Ford has appointed C.T. Corporations System, 75 Beattie Place, 2 Shelter Center, Greenville, South Carolina, as its registered agent for service of process in this State and upon whom the summons and complaint may be served.

6. The amount in controversy is over \$75,000 exclusive of interests and costs.

7. Jurisdiction in this court is founded on diversity of citizenship pursuant to 28 U.S.C. §1332, and Ford is subject to the jurisdiction of this court.

8. A substantial part of the events or omissions giving rise to the Plaintiff's claims asserted herein arose within the district, and Ford is subject to personal jurisdiction in this district. Therefore, venue properly lies in this district pursuant to 28 U.S.C. §1391 (a)(2) and (3).

#### The Product

9. The motor "vehicle" involved in the action is a 1992 Lincoln Town Car 4DR sedan (the model "vehicle" is hereafter referred to as the "Town Car"), vin number 1LNLM82W5NY640531 (the particular "vehicle" involved in the incident is hereafter referred to as the "vehicle").

#### The Incident

10. The incident forming the basis for this lawsuit is a "vehicle" fire which occurred on or about October 29, 1996, at approximately 1:00 a.m., at 1942 S. Waccamaw Drive, Garden City, South Carolina, in which the house and "vehicle" suffered severe damage (the "incident").

#### Conditions Precedent

11. All conditions precedent to the bringing of this action and plaintiff's right to the relief sought herein have occurred, have been performed, or have been excused.

#### General Allegations

12. At the time and place of the incident Mrs. A. McKoy Rose, Jr. parked the "vehicle" under the house located at 1942 S. Waccarnaw Drive, Garden City, South Carolina. The "vehicle" ignited in fire minutes after being turned off.

13. The engine fire rapidly spread from the "vehicle" to the house.

14. Ford designed the Town Car generally, and the "vehicle" specifically, including, but not limited to, the engine compartment and ignition system.

16. Ford inspected the Town Car generally, and the "vehicle" specifically, including, but not limited to, the engine compartment and ignition system.

17. Ford tested the Town Car generally, and the "vehicle" specifically, including, but not limited to, the engine compartment and ignition system.

18. Ford manufactured the Town Car generally, and the "vehicle" specifically, including, but not limited to, the engine compartment and ignition system.

19. Ford marketed the Town Car generally, and the "vehicle" specifically, including, but not limited to, the engine compartment and ignition system.

20. Ford distributed the Town Car generally, and the "vehicle" specifically, including, but not limited to, the engine compartment and ignition system.

21. Ford assembled the Town Car generally, and the "vehicle" specifically, including, but not limited to, the engine compartment and ignition system.

22. Ford sold the "vehicle" as a new product.

23. the "vehicle" and the engine compartment and ignition system with which it was equipped, left Ford's control in the same condition as it was at the time and place of the incident, with the exception of wear and tear.

24. Ford had a legal duty to design, inspect, test, manufacture and assemble the "vehicle" so that it would provide a reasonable degree of safety during foreseeable use occurring in the environment of its expected use.

25. - - Ford expressly and impliedly warranted that the "vehicle" and its engine compartment and ignition system would operate to safely protect users from fires occurring in the expected environment of the "vehicle's" expected use.

26. As designed, inspected, tested, manufactured, assembled, marketed, distributed, and sold by Ford, the Town Car generally and the "vehicle" specifically is defective and unsafe for foreseeable users and occupants because its engine compartment and ignition system and related parts are inadequately designed and constructed and fail to prevent a fire from occurring in foreseeable use occurring in the expected environment of its expected use.

27. Ford had a legal duty to warn the public and the Plaintiff(s) of any latent defect in the "vehicle" or in the engine compartment and ignition system with which it was equipped. Ford breached this duty by failing to warn the Plaintiff(s) of the "vehicle's" defective and unreasonably dangerous engine compartment and ignition system.

28. In so designing, inspecting, testing, manufacturing, assembling, marketing, distributing, and selling the "vehicle", Ford acted willfully, wantonly, recklessly and negligently.

29. Plaintiff's injuries were the direct and proximate result of Ford's misconduct and the defective and unsafe "vehicle".

30. As a proximate result of Ford's wrongful conduct, Plaintiff(s) have suffered serious damage to personal and real property and have incurred expenses in excess of \$75,000 for damage to personal and real property.

31. In designing, manufacturing, assembling and marketing the Town Car generally and the "vehicle" specifically, Ford's actions or omissions were done willfully, wantonly, fraudulently, maliciously, oppressively, and with conscious indifference to consequences and the rights and safety of others so that punitive damages should be imposed in an amount sufficient to keep such wrongful conduct from being repeated.

32. By reason of the foregoing, Ford has breached its express and implied warranties set forth above.

COUNT I

PLAINTIFFS BANKERS INSURANCE COMPANY  
AND AMR PARTNERS, LP TORT CLAIMS

33. Paragraphs 1 through 32 are incorporated by reference.

WHEREFORE, Plaintiffs, Bankers Insurance Company and AMR Partners, LP demand trial by jury and judgment against Ford for such sums as compensatory damages in excess of \$75,000 as the evidence shows him to be justly entitled to recover, punitive damages in an amount sufficient to keep such wrongful conduct from being repeated, as well as interest and attorney's fees, if applicable, and all costs of this action.

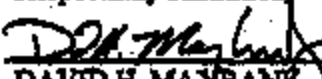
COUNT II

PLAINTIFFS BANKERS INSURANCE COMPANY AND  
AMR PARTNERS, LP WARRANTY CLAIMS

34. Paragraphs 1 through 32 are incorporated by reference.

WHEREFORE, Plaintiffs Bankers Insurance Company and AMR Partners, LP demand trial by jury and judgment against Ford for such sums as compensatory damages in excess of \$75,000 as the evidence shows him to be justly entitled to recover, punitive damages in an amount sufficient to keep such wrongful conduct from being repeated, as well as interest and attorney's fees, if applicable, and all costs of this action.

Respectfully submitted,

  
\_\_\_\_\_  
DAVID H. MAYBANK, JR.  
Federal ID No. 7032  
O'Brien & Hennessey  
211 King Street, Suite 320  
Charleston, South Carolina 29401  
(843) 723-0412

Charleston, South Carolina  
Dated:  1999.

CSCN140

## VEHICLE DATA

08/13/99 14:46:20

ENTER VIN ==&gt; 1LNLM82W5NY640551

NAME ==&gt; ROSE

ZIP ==&gt; 300642325 MODEL YR ==&gt;

OWNER NAME :

STREET ADDR :

CITY

ST/PRV: GA CTRY:

ZIP/POSTAL CODE: N/A YY-MM-DD 96-06-16

MODEL YEAR : 92 PLANT: Y

SALE YY-MM-DD 91-10-31

BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES PRODUCTION YY-MM-DD 91-10-17

VEHICLE DESC : 1992 TOWN CAR

|             | DIVISION | DISTRICT | ZONE | DEALER | PDC CODE | FCSD REGION |
|-------------|----------|----------|------|--------|----------|-------------|
| SHIP-TO     | 3        | 26       | B    | 060    | 43       | 21          |
| FACING      | 3        | 26       | B    | 060    |          |             |
| RESPONSIBLE | 3        | 26       | B    | 060    |          |             |

CA EMISSION : ENGINE TAG CODE : 1G810BA

NAVIS STATUS : 800

COMPANY CAR IND :

DSO DISTRICT :

FLEET CODE : RC999

DSO NUMBER :

FLEET STATUS : A

## CAMPAIGN COUNTS

TOTAL CAMPAIGNS : 03

OPEN : 01 CLOSED : 02

ACTIVE: 02 HISTORY: 01

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

LPENJ82

11N1432W5NY640551

1992 TOWN CAR

4 DR SEDAN SIGNATUR

08/13/1999 15:06:24

4.6L SOHC (ROMEO)

118DR00A AUTO OD AOD/AX4S

AXLE CODE: P5

\*OPEN CAMPAIGNS

~~HOOD LATCH~~

HOOD LATCH REPLACEMENT

\*WARRANTY START DATE 10/31/1991 BUILD DATE 10/17/1991 START ODOM

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

NO ESP INFORMATION AVAILABLE

FOR MORE INFO <RTN>, K. MENU OR 99. BYE

18:30 AUG 13, 1999  
PRODUCTION DATE: AUG 13, 1999  
CS011403 VER. 12:14 AUG 21, 1998

FORD CUSTOMER SERVICE DIVISION  
SERVICE, WARRANTY, AND FINANCIAL SYSTEMS DEPARTMENT  
CAMPAIGN NOTIFICATION AND ADMINISTRATIVE CONTROL SYSTEM

PAGE 3  
JOB 38876-00  
SECTION 054002.04

CS011403

VEHICLE CAMPAIGN REPORTING (HISTORY DATABASE)

CASE ID: AMR

VEHICLE ID: 1L0LW2P50Y640551 (CONTINUED)

REQUESTOR ID: LPERJ82

|                  |                      |                      |                      |                              |
|------------------|----------------------|----------------------|----------------------|------------------------------|
| VEHICLE LINE : V | SELLING DIVISION: 3  | FACING SALES DIV: 3  | SHIP TO DIVISION: 3  | VEHICLE PROD DATE : 10-17-91 |
| COMPANY CNA IND: | SELLING DISTRICT: 24 | FACING DISTRICT : 24 | SHIP TO DISTRICT: 24 | SALE DATE : 10-31-91         |
| CA EMISSION :    | SELLING ZONE : 0     | FACING ZONE : 0      | SHIP TO ZONE : 0     | ENGINE TAG CODE : 1G810BA    |
| PORT CODE :      | SELLING DEALER : 060 | FACING DEALER : 060  | SHIP TO DEALER : 060 | MAVIN STATUS : 000           |
| PROD REGION : 21 | SSO NUMBER :         | TIRE CODE :          | FLEET CODE : BC999   | POC CODE : 45                |
| PROD ZONE : C4   | SSO DISTRICT :       | TIRE BRAND :         | PLANT STATUS : A     | PREDELIVERY CENTER:          |

NAME AND ADDRESS  
OF LAST KNOWN  
OWNER

~~XXXXXXXXXX~~  
201 HATFIELD AVE NW  
MARJETTA

N/A SOURCE : P N/A EFF DATE : 06-16-96

ST/PRV: 0A ZIP/POSTAL CODE: 300642325

| CAMPAIGN<br>NUMBER         | SPLINT<br>CODE        | KIT<br>CODE                         | REPAIR<br>DATE                       | REPAIR<br>DEALER<br>CMT<br>CODE   | VENDOR<br>N/A<br>IND | RI<br>N/A REQ<br>SENT DATE | VENDOR<br>N/A<br>MATCH<br>CODE | GOVERN<br>EMBEL<br>CODE |
|----------------------------|-----------------------|-------------------------------------|--------------------------------------|-----------------------------------|----------------------|----------------------------|--------------------------------|-------------------------|
| <del>XXXXXXXXXX</del>      |                       | AA                                  | 02-24-94                             | <del>XXXXXXXXXX</del>             |                      | 12-08-97                   | 1                              |                         |
| CAMPAIGN<br>93831<br>93831 | STATUS CODE<br>C<br>H | STATUS DATE<br>02-01-94<br>12-03-93 | REPAIR TYPE<br><del>XXXXXXXXXX</del> | MICRO REFERENCE NUMBER<br>1284721 | CLAIM SOURCE<br>AC   |                            |                                |                         |

ENTER CAMPAIGN NUMBER=> 95819 VIN=> 1LNLM82W5NY640551 TYPE OF SEARCH: A  
MODEL YEAR: 92 DEFECT: HOOD LATCH BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
NEW STATUS CODE:  
REPAIR INFORMATION: TYPE CODE: CAMP DIV : 6  
REPAIR DATE: DEALER P/A: SUPP CODE :  
MICRO REF: CLAIM NUM: KIT CODE : AA  
DELETE REASON: OASIS DATE : 95-08-30  
VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 1  
CURRENT: 3 26 060 ASSIGNED: 97-12-08 SOURCE: PX EXTRACT DATE: 97-12-08  
\*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
N RELEASED FOR MAILING 97-07-21  
N RELEASED FOR MAILING 96-08-21  
N RELEASED FOR MAILING 96-02-07  
N RELEASED FOR MAILING 95-08-30  
H AWAITING MAILING 95-08-08

## DELETE REASON:

F1-INQUIRY F2-Q140 F3-EXIT F5-Q130 F7-FIRST F8-NEXT F9-MORE STATUS  
F10-ADD STATUS F11-REVISE (ALL DATA FIELD DATES YY-MM-DD)  
I037-NO MORE DATA TO DISPLAY

LPENJ82



CSCN130

## NOTIFICATION RECIPIENT HISTORY

08/13/99 14:49:16

ENTER CAMPAIGN NBR ==&gt; 95819

VIN ==&gt; 1LNLM82W5NY640551

DEFECT : HOOD LATCH

BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES

RESP DEALER :

BEGINNING MAILED DATE: 97-07-21 YY-MM-DD

RELEASE DESC : OSU FOLLOW UP MAILED

ENDING MAILED DATE : 97-07-21 YY-MM-DD

CAMPAIGN DIV : 6

FLEET CODE:

FLEET MGMT LOC CODE:

LAST NAME :

INITIALS: AM

STREET ADDR1 :

ADDR2 :

ST/PRV: GA

CITY : MARIETTA

CTRY:

ZIP/POSTAL CODE: [REDACTED]

N-A SOURCE: P N-A EFF DATE: 96-06-16 YY-MM-DD

\*\*\*\*\*

RESP DEALER :

BEGINNING MAILED DATE: 96-08-21 YY-MM-DD

RELEASE DESC : OSU FOLLOW UP MAILED

ENDING MAILED DATE : 96-08-21 YY-MM-DD

CAMPAIGN DIV : 6

FLEET CODE:

FLEET MGMT LOC CODE:

LAST NAME :

INITIALS: AM

STREET ADDR1 :

ADDR2 :

ST/PRV: GA

CITY : MARIETTA

CTRY:

ZIP/POSTAL CODE: [REDACTED]

N-A SOURCE: R N-A EFF DATE: 95-08-30 YY-MM-DD

F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140

I032-PRESS F8 FOR MORE DATA

LPHNJ82

ENTER CAMPAIGN NBR ==&gt; 95819

VIN ==&gt; 1LNLM82W5NY640551

DEFECT : HOOD LATCH

BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES

RESP DEALER : 326060

BEGINNING MAILED DATE: 96-02-14 YY-MM-DD

RELEASE DESC : POSTCARD FOLLOWUP

ENDING MAILED DATE : 96-02-14 YY-MM-DD

CAMPAIGN DIV : 6

FLEET CODE: RC999 FLEET MGMT LOC CODE: 9999

LAST NAME :

INITIALS: AM

STREET ADDR1 :

ADDR2 :

ST/PRV: GA

CITY : MARIETTA

CTRY:

ZIP/POSTAL CODE: [REDACTED]

N-A SOURCE: R N-A EFF DATE: 95-08-30 YY-MM-DD

\*\*\*\*\*

RESP DEALER : 338060

BEGINNING MAILED DATE: 95-09-22 YY-MM-DD

RELEASE DESC : NEW ISSUE TOTAL

ENDING MAILED DATE : 95-09-22 YY-MM-DD

CAMPAIGN DIV : 6

FLEET CODE: RC999 FLEET MGMT LOC CODE: 9999

LAST NAME :

INITIALS: AM

STREET ADDR1 :

ADDR2 :

ST/PRV: GA

CITY : MARIETTA

CTRY:

ZIP/POSTAL CODE: [REDACTED]

N-A SOURCE: R N-A EFF DATE: 95-08-30 YY-MM-DD

F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140

I048-LAST PAGE

LPENJ82

ENTER CAMPAIGN NUMBER=> 96L12 VIN=> 1LN1MS2W5NY640551 TYPE OF SEARCH: A  
 MODEL YEAR: 92 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
 NEW STATUS CODE: CAMP DIV : 6  
 REPAIR INFORMATION: TYPE CODE: SUPP CODE :  
 REPAIR DATE: DEALER P/A: KIT CODE : CH  
 MICRO REF: CLAIM NUM: QASIS DATE :  
 DELETE REASON: VENDOR N/A INFORMATION:  
 RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 1  
 CURRENT: 3 26 060 ASSIGNED: 97-12-08 SOURCE: PX EXTRACT DATE: 97-12-08  
 \*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  

| CODE | DESCRIPTION          | DATE     | TYPE | DATE     | P/A   | CLAIM# | CL | SRC |
|------|----------------------|----------|------|----------|-------|--------|----|-----|
| F    | FORCED COMPLETION    | 98-01-22 | B    | 98-01-22 | AUTOC |        |    | OL  |
| M    | RELEASED FOR MAILING | 97-03-05 |      |          |       |        |    |     |
| M    | AWAITING MAILING     | 96-11-22 |      |          |       |        |    |     |

## 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)  
 I037-NO MORE DATA TO DISPLAY

LPENJ82

CSCN130

NOTIFICATION RECEIPT HISTORY

08/13/99 14:49:28

ENTER CAMPAIGN NBR ==> 96L12 VIN ==> 1LNLM82W5NY640551  
 DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES  
 RESP DEALER : 326060 BEGINNING MAILED DATE: 97-03-13 YY-MM-DD  
 RELEASE DESC : HI PART KIT CODE ENDING MAILED DATE : 97-03-18 YY-MM-DD  
 CAMPAIGN DIV : 6 FLEET CODE: RC999 FLEET MGMT LOC CODE: 9999  
 LAST NAME : INITIALS: AM  
 STREET ADDR1 :  
 ADDR2 :  
 CITY : MARIETTA CTRY:  
 ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 96-06-16 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 :  
 ADDR2 :  
 CITY : CTRY:  
 ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE: YY-MM-DD  
 F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140  
 1048-LAST PAGE LPENJ82

CSCW150

## CAMP2™ VEHICLE INFORMATION

08/13/99 14:49:31

ENTER CAMPAIGN NUMBER=> 93B31 VIN=> 1LWLM82W5NY640551 TYPE OF SEARCH: H  
 MODEL YEAR: DEFECT: BODY STYLE:  
 NEW STATUS CODE: CAMP DIV :  
 REPAIR INFORMATION: TYPE CODE: SUPP CODE :  
 REPAIR DATE: DEALER P/A: KIT CODE :  
 MICRO REF: CLAIM NUM: OASIS DATE :  
 DELETE REASON: VENDOR N/A INFORMATION:  
 RESP DEALER INFORMATION: NEW: -- -- IND: MATCH CODE:  
 CURRENT: ASSIGNED: SOURCE: EXTRACT DATE:  
 \*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
 CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
 C COMPLETE B 94-02-01 223283 TZB4721 AC

## DELETE REASON:

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 F10-ADD STATUS F11-REVISE (ALL DATA FIELD DATES YY-MM-DD)  
 I037-NO MORE DATA TO DISPLAY

LPENJ82

# Deposition of Mark Hoffman

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Case No. [REDACTED]

PLAINTIFF(s):

FOOD NOTION COMPANY

DEFENDANT AND THIRD  
PARTY PLAINTIFF

THE INVESTMENT, INC.  
THIRD PARTY DEFENDANT

Defendant(s):

Given before this Court, Court Reporter and  
Deputy Clerk, at the Law Offices of Nelson, Mullins,  
Siley & Scarborough, Fourteen Century, Suite 301, 2011  
North Oak Street, Myrtle Beach, South Carolina, on  
Thursday, June 28th, commencing at 11:41 o'clock a.m.

RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA  
-Florence, South Carolina-  
Having this day appeared by their attorney

Ray Swartz, Counsel  
Florence, South Carolina  
Myrtle Beach, South Carolina  
Spartanburg, South Carolina

RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA 1-800-822-8711

Page 2

## APPENDIX A

For the Plaintiff(s):  
O'Brien & Associates  
201 King Street, Suite 301  
Charleston, SC 29401

For the Defendant(s):  
Nelson, Mullins, Siley &  
Scarborough, L.P.C.  
201 King Street, Suite 301  
Charleston, SC 29401  
Myrtle Beach, SC 29577  
Nelson, Mullins, Siley &  
Scarborough, L.P.C.  
201 King Street, Suite 301  
Charleston, SC 29401

RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA 1-800-822-8711

Page 2

DEED TO ESTATE OF  
DIRECT EXAMINATION BY MR. O'BRIEN

DEED TO ESTATE OF

NO EXHIBIT'S WERE PRESENT

RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA 1-800-822-8711

Page 3

It was stipulated by and between counsel for  
the parties that this deposition is taken pursuant  
to notice and that all questions as to notice are  
waived; that all objections, save as to the form  
of the questions, are reserved until the time of  
trial; that the deposition is taken pursuant to  
the South Carolina Rules of Civil Procedure, for  
the purposes aforesaid; and that the  
deponent was explained his right to read and  
sign the deposition and DID NOT WAIVE that  
right.

[REDACTED], being duly sworn,  
testified as follows:

DIRECT EXAMINATION BY MR. O'BRIEN

- Q. What is your full name?  
A. My full name is [REDACTED]  
Q. And [REDACTED], where do you reside?  
A. I reside in Woodfield Hills, Michigan.  
Q. And have you had your deposition taken before?  
A. Yes.  
Q. Approximately how many times?  
A. Three or four. Three, I think.  
Q. Have those depositions always been about a 1994,  
'91 Lincoln Towncar?

RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA 1-800-822-8711

A. Yes they have.

Q. I want to alert you, when I ask a question you have to make a verbal response so that it can be taken down you can't shake your head yes or no but, I'm sure you understand that.

A. Yes, sir.

Q. Okay. And what is your position with Ford Motor Company?

A. I am a design analysis engineer.

Q. And how long have you held that position?

A. Since February of '91 --

Q. How long, how long have you been with Ford?

A. On and off for the last twenty-two years.

Q. Okay. Let's just briefly give us a history of your involvement with Ford.

A. I took a job with Ford when I first graduated from engineering school in 1978 and worked in manufacturing engineering in the Salina Plant. I then went later on in my career moved to the electronics division, product engineering office, which designs component parts for the vehicles, electrical component parts. And then later on moved to an area called systems, electrical systems engineering, which is part of the vehicle development, vehicle designing in

RAY SWARTZ &amp; ASSOCIATES OF SOUTH CAROLINA 1-800-822-8711

the company.

Q. And at the present time today, what do you do for Ford?

A. The design analysis department is a group that works with our office and the general counsel to investigate insurance claims and lawsuits involving product liability, allegations against the company's products.

Q. Okay. And what is your role in, in that process?

A. The department that I work in is responsible for cases involving power windows and chassis components. So we, we'll handle any of the five cases since most of the allegations have to do with engine or power train or under hood components.

Q. Okay. And, for example, there's an allegation by a customer that his car caught fire and he notified Ford, now what would you specifically do in your role?

A. There are, there are several other people that are involved in those kind of calls long before I become involved. A lot of times calls come through our customer service division through an entity called the customer assistant center,

RAY SWARTZ &amp; ASSOCIATES OF SOUTH CAROLINA 1-800-822-8711

they are the first people who would probably talk to a customer in those kind of cases if the customer contacts directly --

Q. Okay.

A. -- If it's an insurance company they will usually send them information to the office of general counsel. And if the office of the general counsel feels that they need some technical questions asked about the information that they've been given, they will then send it to design analysis engineering and ask us to review that information.

Q. In your role do you actually go out and, and look at a vehicle that has caught fire?

A. Yes. I do.

Q. Okay. In what area's of the country do you do that?

A. I have been from one end to the other.

Q. Okay. Over what period of time?

A. The last year and a half.

Q. And what vehicles have you been looking at?

A. Any product line, you know, that we have that, that happens to be involved in a fire.

Q. Okay. Have you had the occasion to go out and do a full investigation of a Lincoln Towncar that's

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involved?

A. Yes, sir.

Q. How many times have you done that?

A. I haven't counted them up exactly but I would estimate between twenty and thirty.

Q. And on those times that you don't go out to look at the vehicle and you said the general counsel might contact you to give an opinion, could you give us an idea of what type of opinion they might ask you to give?

A. They sometimes receive information from the plaintiff's is a case that may vary in detail from a letter with a description of the event to a fire investigation report and origin report and photographs. Sometimes the copies of the photographs will vary a bit in quality but they will ask us to give them an opinion based on that information --

Q. Okay.

A. -- as to whether we think that it's a legitimate claim.

Q. So essentially your reviewing in that situation would not be reviewing other engineer's work, like the plaintiff's engineer's work?

A. Their engineers or their fire experts or fire

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1 investigations, yes.  
 2 Q. Name and origin?  
 3 A. Yes.  
 4 Q. Photographs. And then come into a decision as to  
 5 whether you think Ford is responsible in some  
 6 way or not, is that fairly accurate?  
 7 A. That's roughly where we get to, yes.  
 8 Q. Okay. And you -- have you done the work on the  
 9 work involving Eastern Insurance Company and JRM  
 10 Partners versus Ford Motor Company?  
 11 A. Yes, sir. I have.  
 12 Q. Okay. And tell me what you have done, just  
 13 briefly.  
 14 A. I have reviewed the vehicle data that we have  
 15 available in the company on that particular  
 16 vehicle. We are supplied with the, the VIN, the  
 17 vehicle identification number and we can run  
 18 that through our computer systems at, at Ford  
 19 and pick up its sale's and service information  
 20 that we have available to us.  
 21 Q. Okay.  
 22 A. And I was also given copies of count and origin  
 23 report by Mr. Phillip Kennedy, I believe. And,  
 24 laser copies of his photographs, and I reviewed  
 25 those, those documents.

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1 Q. When you look at a VIN number you say you can  
 2 tell about its sale's and service information,  
 3 what you learn from a VIN number by the sales  
 4 and service information?  
 5 A. We can pull up the, the data that the vehicle  
 6 was built, the date that it was delivered to the  
 7 dealership, the date they were sold to them, and  
 8 then customer, whether the vehicle was a retail  
 9 sale or lease, whether it went to a retail  
 10 customer or a fleet customer. It will list  
 11 somewhere all of the major optional features  
 12 that were included in that vehicle build.  
 13 Q. Okay.  
 14 A. We can also then pull up the service records if  
 15 the vehicle was serviced at Ford dealer, under  
 16 warranty.  
 17 Q. Is this a centralized computer system that Ford  
 18 has?  
 19 A. Yes.  
 20 Q. So if, if a customer vehicle is serviced at a  
 21 Ford dealer it goes by that VIN number and  
 22 somehow that goes to the central, central data  
 23 base, is that correct?  
 24 A. Yes.  
 25 Q. You can tell the date that a vehicle was built

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1 by the VIN number, is that correct?  
 2 A. Yes.  
 3 Q. Can you tell where it was built?  
 4 A. Yes, sir.  
 5 Q. Okay. And, and I don't want to take too much  
 6 time with it, let's just take this one VIN  
 7 number that's on this, if you could just read  
 8 the VIN number and tell me what you know by  
 9 reading that.  
 10 A. VIN, 1L7M2H2W1M1012001.  
 11 Q. Okay. What does that tell us?  
 12 A. Starting, having looked at several of these, I  
 13 know that the 1L7 at the beginning tells us that  
 14 this is a Lincoln Mercury product. That it is a  
 15 Towncar, the 1M10, if you go through the first  
 16 five digits tells us that.  
 17 Q. Okay.  
 18 A. The next two digits I would have to look up in  
 19 the back because I don't remember exactly what  
 20 they are but they have to do with the, the power  
 21 steering and brakes and passive restraints system  
 22 that's on the vehicle. The 1 is usually just a  
 23 random generated number that makes the VIN  
 24 unique --  
 25 Q. Did you say what the F was?

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1 -- the capital -- the F, I and V defines some of  
 2 the major features of the vehicle, the power  
 3 steering, what engine it is it basically what  
 4 transmission, engine system and passive  
 5 restraint system are on the vehicle --  
 6 Q. Does that tell you anything about the, the  
 7 cruise control system?  
 8 A. No. It doesn't.  
 9 Q. Okay. And the 1 --  
 10 -- the capital -- the 1 is a randomly generated  
 11 number that's put in there to make the number  
 12 unique, the VIN number unique.  
 13 Q. Okay.  
 14 A. The capital V tells us that it was a 1993 model  
 15 year vehicle build. Capital F tells us that it  
 16 was built in the Wixom assembly plant in Wixom,  
 17 Michigan. And the last six digits are, it just  
 18 a random sequence number. The number's between  
 19 000000 or six hundred thousand and 999999 are  
 20 all reserved for Lincoln Mercury vehicles.  
 21 Q. So that, that number 01101 tells you that it's  
 22 a Lincoln Mercury vehicle?  
 23 A. Yeah. The series tells us that when I run this  
 24 through the computer and get a, a match to that  
 25 number it points to that specific vehicle.

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Q. Okay. Is that it? Anything else?

A. Not on the VIN, no.

Q. And after you reviewed all the material that was supplied to you about this particular case, what conclusions did you come to?

A. I came to the conclusion that the two allegations that I had either read about or heard about in this case were inaccurate. The vehicle was built before the recall date that the one allegation involved. It did not have a speed control deactivation switch in it that was subject to that particular recall. That was alleged to be the defect that started the fire.

Q. It was built before the recall date and it did not have the speed control device which is the subject of the recall.

A. Yes, sir.

Q. Okay. Any other conclusions that you reached?

A. Really with the limited data that I had I did not feel that I could develop any other opinions on that particular vehicle.

Q. Did you -- did you determine whether it was, what plant it was built in?

A. Yes, sir. Wixom assembly plant in Wixom, Michigan.

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Q. The same one that you testified to on our example, is that right?

A. Yeah.

Q. And were 1991 Lincoln Towncars built in the Wixom assembly plant that, that are subject to this recall?

A. Yes, sir. That was the only plant in that time frame that was building town cars.

Q. Okay. And what was the date that this Lincoln town car was built?

A. Is it okay if I speak, exactly. I don't want to give you a bad date. This vehicle was built on October 17<sup>th</sup>, 1991.

Q. And when did the speed control device, when were they first installed by Ford?

A. The speed control device began being in -- the new, the new version of speed control which was the speed control deactivation switch began production into the town car at Wixom sometime in the November '91 time frame.

Q. Okay. First question. Is there a, a guideline or some information that's available to you and perhaps available to me as well, that can help me explain these VIN numbers, what they all mean, is there something written about them?

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A. Yeah. The Ford service manuals that are published for all of our dealers and any other shops that, that wish to order them. The very first section of all our shop manuals give a digit by digit description of how to decode a VIN.

Q. Okay. So that's something that's readily available. Could you make a copy of that and mail it to me?

A. Sure. Absolutely.

Q. And lastly, you came to the conclusion this car built on October 17<sup>th</sup>, 1991 and you did that by the VIN number, is that correct?

A. Yes, sir.

Q. Okay. You also made a conclusion that these cars, these speed control devices were installed sometime in the beginning of November of 1991 at the Wixom plant in Michigan, what information did you use to come to that conclusion?

A. The information that I used was the actual recall publication itself, recall 91-8-18. I have had conversations with the people involved in analyzing and researching the issue with the town car files, etc. They were basically, the group of engineers who determined that this part

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needed to be recalled. And the reason that they picked November 8<sup>th</sup>, 1991 as the beginning was, they actually wanted to try and overlap back into the previous version of the speed control to insure that they had captured all of the electrical switches, because they weren't able to pinpoint the exact point in time when the switches that were in question had actually went into production in our vehicles --

Q. Okay. How many days did overlap? A couple weeks?

A. To the best of their knowledge as far as when they thought the parts went into production, they went back about two weeks.

Q. And again, describe the, the difference between the previous version of speed control and the one that's subject to the recall.

A. The previous version of the speed control had what is called a vacuum actuation system, it uses engine vacuum as the source of power to actually move the, the speed controls throttle cable and adjust the throttle to set the speed on the vehicle. To shut that off, of course, all you needed to do is remove the vacuum from that system so the device called a vacuum dump

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valve was used as the deactivation mechanism, there was no electrical control involved in it.

Q. Okay. And where was this vacuum dump valve located?

A. It's located on the brake pedal and the brake pedal support underneath the instrument panel in the interior of the vehicle.

Q. Okay. Do you have any specifications or diagram of that device?

A. Not with me --

Q. Can you get that?

A. -- Ford does have the, the engineering drawings and specifications.

Q. Does that device have any physical connection to the, the left rear engine compartment? Is there anything in that device that is located in the left rear engine?

A. The device has a vacuum hose connected to it and the vacuum hose does go out to the left rear portion, the driver's side rear portion of the vehicle. And the other end of that hose connects to a device called the speed sensor, servo.

Q. Are there any electrical components in that whole system?

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A. The parts that we're talking about as far as deactivation, as there are no electrical components. The only electrical components in the old speed control system was the speed control module itself which is a small printed circuit board that does the actual determining of where the set point should be and then it actuates two valves that will turn on or turn off the vacuum and set the throttle in the right position based on the vehicle speed.

Q. Do you know why Ford switched from this system to the new system?

A. The new system uses a, a much more sophisticated control computer printed circuit board and an electrical, an electric motor to actuate throttle because it gives the engineer much, much more control over the throttle. In the old system it was always kind of difficult for the customer to be able to set the speed precisely because they had to hold the buttons down on the steering wheel and watch their speedometer and then try and set it manually by, you know, their feel. The new system being electronic, it was capable of actually deeming switch contacts that the customer made so you would actually top

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the switch once and it would go up one mile an hour, you could keep the coast switch once and it would go down one mile an hour. So you could actually set a more precise speed with it.

Q. Have you, have you prepared a written report?

A. No, sir.

Q. And if you could -- this should be my final question here, did you get the VIN number of this particular vehicle and interpret that for me, please?

A. All right. It's very similar to the one that you had handed me earlier. It does have the 11MMN beginning, which tells me it is a Lincoln Town car. Now again, it has, I believe that means it has a driver side air bag but again I'd have to double check --

Q. Okay.

A. -- it has a 4.9 liter engine --

Q. What are you, what are you reading that, to tell you that?

A. -- the VIN --

Q. Oh, that tells you --

A. -- YES, those, those four digits in there have that information.

Q. Okay.

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A. The 1 again, is a randomly generated number. And it is 1983 model year, the 7 is V6 engine assembly plant and the last six digits are, are the sequence numbers.

Q. And what did you, what did you read that told you when that vehicle was built?

A. This is a report that comes out of the Lincoln warranty system --

Q. Right.

A. -- within Ford Motor Company. I give it the VIN and it searches and will give me a vehicle information report which is what I'm using here. It has the VIN and the way the vehicle was built based upon --

Q. Okay. Can I get a copy of that report?

A. Yes.

Q. Since you have one. Now, the, there's also been a problem in 1983 Lincoln Town car with firm that begins in the ignition switch, is that correct?

A. No, sir.

Q. Oh, there hasn't been?

A. No, sir.

Q. Isn't there been a recall on the ignition switch?

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- 1 A. There was a recall on ignition switches but, not  
2 in '82 open cars.
- 3 Q. Okay. What was that for, what year's were they?
- 4 A. The year's vary by vehicle lines. I believe the  
5 time car was involved in that recall because it's  
6 major redesign in 1984 so I'd guess '85 to '88,  
7 or '87 to '88 model year.
- 8 Q. Okay. Now whether or not, you mentioned the  
9 fact that insurance companies making claims and  
10 I have a list, counsel supplied me with all  
11 the list of the claims but, I don't see one  
12 claim filed by insurance company, like a  
13 subrogation claim, are they handled separately,  
14 is that correct?
- 15 A. I'm sure what, what you have there.
- 16 Q. I have a list of all the complaints about the  
17 1982 Lincoln Town car and a list of all the  
18 litigation and based on what I see here these  
19 are all individuals I don't see any claims,  
20 subrogation claim by an insurance company.
- 21 A. Yeah, I wouldn't know without actually looking  
22 at them specifically to answer that --
- 23 Q. Okay.
- 24 A. -- I do know that in a lot of the cases that  
25 I've looked on that are subrogation claims, the

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- 1 insurance company does use the original vehicle  
2 owner name in the, in the title of the case and  
3 that's --
- 4 Q. Okay.
- 5 A. -- and that's, as that's why, and to use that  
6 name as well. I think it's just because it's  
7 more specific information to help track of  
8 rather than State Farm Insurance.
- 9 Q. So you, if this is true then your explanation is  
10 that even though there might be a subrogation  
11 claim the insurance companies not involved on  
12 this possibility?
- 13 A. Again I'd, I'd -- yeah, I'd have to look at the  
14 form to know what exactly your looking is to.
- 15 Q. Okay. And are you aware of any other  
16 subrogation, litigation involving the 1982  
17 Lincoln Town car? Our client here is [REDACTED]  
18 [REDACTED] are there others?
- 19 A. Yes.
- 20 Q. You have litigation cases involving insurance  
21 companies?
- 22 A. Yes.
- 23 Q. Do you know where that is, where they located,  
24 where the plaintiffs are with the insurance  
25 company?

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- 1 A. Not all of them. But, they're also varied by  
2 company, they're varied by geography.
- 3 Q. Do you know how many cases are in litigation  
4 involved in 1982 Lincoln Town car?
- 5 A. I am not certain of the total number of claims  
6 and cases. I believe it's somewhere in the  
7 range of two hundred.
- 8 Q. Two hundred litigation cases?
- 9 A. I believe that's all the litigation and  
10 insurance claims but, I'm not, I'm not certain  
11 of the total. I recall usually --
- 12 Q. Yeah.
- 13 A. We usually extract a few of those yearly.
- 14 Q. If I told you that there was only eight lawsuits  
15 involving 1982 Lincoln Town car, would you agree  
16 with that or disagree?
- 17 A. I would not have an opinion on it at the moment,  
18 I know that, that suits are settled and some are  
19 dropped and, and they come and go quite, quite  
20 regularly so I'm really not certain of what the  
21 the current status of that, that court would be.
- 22 Q. Okay. You've testified in three or four already  
23 yourself.
- 24 A. Yes, sir.
- 25 Q. You know the names of the cases that you

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- 1 testified in?
- 2 A. The cases that I have been deposed in, actually  
3 it was, all of the depositions had to do with  
4 one case. The name of it is [REDACTED]  
5 various Ford Motor Company.
- 6 Q. How do you spell Gonzalez?
- 7 A. G-O-N-Z-E-S or G-A --
- 8 Q. The one G-A-S. All right. Do you know the  
9 status of that case now?
- 10 A. I believe that case was settled out of court.
- 11 Q. And where was that case filed?
- 12 A. Bexley County, Texas.
- 13 Q. Where's that county located, is that --
- 14 A. I believe the county seat is in Dallas, Texas.
- 15 Q. And did you actually go there and testify?
- 16 A. I was deposed at plaintiff's counsel or, I'm  
17 sorry, the defense counsel's office in Houston,  
18 Texas. I went to Dallas to look at the  
19 vehicles.
- 20 Q. Okay. And they were 1982 Lincoln Town cars?
- 21 A. The Gonzalez case was a 1982, you know I'm not  
22 certain if it was a town car or Mercury Grand  
23 Marquis, I don't recall.
- 24 Q. Because these switches are also in the Mercury  
25 Grand Marquis is addition.

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1 A. Yes, sir. The Grand Marquis and the Grand  
2 Victoria, the Ford Crown Victoria and the town  
3 car, all three of those vehicle lines were  
4 subject to the same recall.

5 Q. Do you recall by whose the name of either  
6 attorney's is that car?

7 A. The plaintiff's attorney?

8 Q. Yeah, that's it.

9 A. I think it was Norman Jolly.

10 Q. How do you spell Jolly?

11 A. J-O-L-L-Y.

12 Q. And is he in Houston?

13 A. He is in Houston, yes.

14 Q. All right. Okay. Thank you very much. I  
15 appreciate your time.

16  
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18 (Deposition concluded at 11:22 o'clock,  
19 a.m.)

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### Discussion of

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Case No: 4:01-cv-007-23

Figure 10-10

**Zinssumme (CSM) :**

**State Mental Health**

DATE: 10/10/1968  
PAGE: 1

TELETYPE UNIT - DAY  
FBI WASH DC

**The Financial Institutions**

Given before Lisa Crabtree, Court Reporter and Notary Public, at the Law Office of Wilson, Phillips, King & Scarborough, Forenders Center, Suite 101, 211 North Oak Street, Myrtle Beach, South Carolina, on Tuesday, June 23rd, commencing at 11:01 a.m. and as.

RAY JAMES E ASSOCIATES OF SEATTLE CONSULTING  
-Geotechnical, Earth Retention-  
Serving the Puget Sound Area Since 1967  
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|          |            |             |              |
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| Madison  | Greenville | Rockingham  | Wilkes       |
| Camden   | York       | Mecklenburg | Transylvania |
| Richmond | Bladen     | Wake        | Swain        |

RAY ROBERTS &amp; ASSOCIATES OF SOUTH CAROLINA LIMITED-LIAB

**Annex 1**

▲ 1 2 3 4 5 6 7 8 9 10

For the Plaintiff(s): O'Brien & Donovan  
By: John O'Brien, Esquire  
311 Pine Street, Suite 210  
Charleston, SC 29401

For the Defendant(s): Nelson, Mulling, Elley &  
Sauerbrey, L.L.P.  
c/o Donald Starr, Justice  
Department Center, Suite 101  
Merlin Beach, NC 28550

Murphy, James, Joseph, William &  
Robertson, J. E. & Co.

WFL Paul A. Dominick, President  
300 Maryland Avenue, Suite 101  
Cambridge, NC 27402

RAY SWARTZ &amp; ASSOCIATES OF SOUTH CAROLINA 1-800-571-5711

**Figure 3**

**INDEX**

REMARKS: CLASSIFICATION BY NCL, 5/24/81

**CLASSIFICATION OF THE RECORD**

NO-DIRECT RECOGNITION BY MR. STALL

RE-CROSS EXAMINATION BY MR. O'BRIEN:

**Figure 2. Mean body weight (kg) of the subjects.**

RESEARCH REPORTS ON CONSUMERS' & EMPLOYEES'

**WILLIAM J. HARRIS** FOUNDED AN ENTERPRISE

### THEORY: HOW TO FIND AN INDEPENDENT VARIABLE

**EXERCISES INVOLVED IN DIFFERENTIATION**

**POSSIBLE REASONS FOR DIFFERENCES IN RESULTS**

14-00000 PLACED IN CONFIDENTIALITY BOX

**LE-908 PLACED IN DEFENDANT'S EXHIBIT**

1957 HANDED AS INFORMATION - EXACT VALUE

CONDUCTING REPLY DURING AN INTERVIEW

ANALYST: MURPHY M. HARTNETT, JR.

### CONSTITUTIONAL HISTORY

**Example 2**

RAY STANTON &amp; ASSOCIATES OF NORTH CAROLINA, L.P. 301-331-5711

**Figure 4**

**CHILLING EFFECT ON PLAINTIFF'S RIGHTS**

COMPLAINT MADE BY PLAINTIFF'S COUNSEL

DATE OF EXHIBIT FORWARDED AS PLAINTIFF'S

RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA 1-800-822-7711

# Deposition of Mark Hoffman

Page 5

It was stipulated by and between counsel that the parties that this deposition is taken pursuant to notice and that all questions as to admissibility of the deposition, save as to the time of trial, shall be reserved until the time of trial, when the deposition is taken pursuant to the South Carolina Rules of Civil Procedure, for the purposes allowed therein and that the document was explained his right to read and sign the deposition and waived that right.

Mark Hoffman, being duly sworn,  
testifies as follows:

DIRECT EXAMINATION BY MR. SWARTZ

- Q. Mr. Hoffman, if you would please, state your full name for the record.
- A. My name is Mark Eric Hoffman.
- Q. Where do you live Mr. Hoffman?
- A. I live in Bloomfield Hills, Michigan.
- Q. What do you do for a living?
- A. I am an engineer for Ford Motor Company.
- Q. How long have you been an engineer for Ford Motor Company?
- A. I've worked for Ford for twenty of the last twenty-two years.
- Q. All right. Let's go back, and if you would

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please give us the benefit of your educational background, starting after high school.

A. I studied electrical engineering and received my degree in 1978 from the University of Detroit. I studied just after that to receive a bachelor, or a masters degree in business administration in 1980 from Madonna University which is in Livonia, Michigan which is a suburb of Detroit.

- Q. And tell me again what your masters is in.
- A. Business administration.
- Q. And what other training or general background information you have with respect to how you've acquired the skills you have that you use currently in your job.
- A. Mostly through training throughout my career at Ford. Ford has a very aggressive training program to keep employee's skills up to date. I've taken quite a few classes within Ford. Some seminars from engineering organizations like The Society of Auto Engineers. And since taking my most recent position with designing analyst engineering, I have been taking training seminars involving fire investigations and cause and origin, determination --

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- Q. Now -- I'm sorry. How long have you been an engineer?
- A. I've been an engineer since 1978.
- Q. '78. Okay. That's when you got your BA at Detroit?
- A. Yes, sir.
- Q. And what type of engineering is that in?
- A. Electrical engineering.
- Q. Do you have a resume of CV?
- A. Yes, sir.

MR. SWARTZ: Let's mark that as Defendant's number 1. For the record, this is a two page document.

(RECORD MARKED AS DEFENDANT'S EXHIBIT NUMBER 1 FOR IDENTIFICATION.)

- Q. If you would Mr. Hoffman, just kind of touch on some of the highlights of your resume. I see your educational background is listed on there. And what I want from you is just basically, just sort of a, highlights of what you've done at Ford. Whether you've had more than one position at Ford and if so, what, what essentially that position entailed you doing for Ford?
- A. Okay. I started out with Ford in what's called manufacturing engineering, working on tooling

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and automation design and installation in the plant. The plant that I worked in was one called Solen Michigan Assembly Plant. It was involved in building instrument clusters, instrument panels, instrumentation for all of Ford's North American products. I went on from manufacturing engineering to product design. It, when was called back then, the electronic's division. They were basically the design engineering activity that designed the component parts that we used to build at the Solen plant.

I went from there to a position in vehicle engineering where they were in the process of starting an electrical and electronics systems engineering office to work on the electrical system of the vehicle as a whole, as it became more complex during the '80s, the company and really the automotive industry began aware of the fact that they needed to have this, this overall electrical system design of the vehicle's electrical system. I spent ten years there.

I was -- I became a supervisor there and supervised engineers in technical planning, in what we call overall vehicle systems engineering.

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which is basically a big trouble-shooting job is what it turned out to be. It was interesting, where different systems cross over one another and share information. And my last position there was as the supervisor of a group of people working, computer rated engineering that we use to run for the truck or system's engineering people. And for the last year and a half I've been at my current position as a designing analyst engineer.

- Q. And tell me what the essential job duties you have as a design analyst engineer?
- A. I am basically responsible for reviewing product litigation claims for our office at the general counsel. I go through reviewing documents and reports from other experts who are actually going out investigating fire causes or burned vehicles or some other failure allegations to one of our vehicles.
- Q. And as I correct that you have in this job position, that you are currently in, you have investigated fire causes involving Ford vehicles?
- A. Yes, sir.
- Q. Do you have an estimate of how many fire cases you've looked at?

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- A. I believe it's up around fifty at the moment.
- Q. Of those fifty, how many of those, roughly do you recall to be Ford cars, Lincoln Town Car fires?
- A. I -- again, off the top of my head estimate about twenty or twenty-five.
- Q. I know you answered some of these questions earlier, in your discovery deposition, but I'm just going to ask you to go through certain, certain facts again. The town car cases that you've looked at, about twenty or twenty-five, are you referring to twenty or twenty-five that you've actually looked at the vehicle itself or just reviewed different aspects of the case files?
- A. In answering the question that you posed, I was talking strictly of vehicles that I had actually inspected. I've reviewed case files then, then that. As part of the team that worked on the recall that eventually went out. I was brought in after that recall. I was part of a team of people within the office of the general counsel who went out and interviewed all the people within the company in coming to the decision for that recall and collecting a lot of data.

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information and findings. In some of the cases that have been brought against Ford the plaintiffs have actually asked for my files and asked for an expert, actually I think it's called a fact witness, in legal terms, to come to a deposition with knowledge of those files. So I've actually reviewed quite a few files without having seen the vehicles.

- Q. When you have gone to look at a vehicle itself, what is the purpose of your inspection of the vehicle, what are you going there to attempt to do?
- A. I am trying to determine the cause and origin of the fire, like any fire investigation would.
- Q. And what parts, in order to enable you to do that job, what sort of, do you do, when you looking at a car taking pictures of it, examining particular aspects of the car walk us through that.
- A. One of the things that we have learned in our training in fire investigation, is to try and follow a consistent pattern. The National Fire Protection Association has published a series of guidelines. They're Publication number 721, and it suggests that you try to follow a systematic

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approach. So every vehicle inspection that I do, I try to follow the same approach, where you start from outside and begin to look more closely and more closely.

You do use photographic documentation to record the, the vehicle and any details that you might observe. And begin to, you know, move and move to try and start in basically on where the fire originated and then once you're in that general area of the vehicle, to try to determine what the cause of the fire was.

- Q. In your course of looking at different vehicles, what if any differences are there, when you are unable to look at the vehicle itself either, if you are just given a file to review or if for any particular reason the vehicle is unavailable for inspection?
- A. One of the things that's described in, in the National Fire Protection Association guidelines and also one of the things that I have learned in school, as an engineer, is that if you don't have data, you need to be quite careful about drawing conclusions.
- So I will typically not try to formulate one specific conclusion if I haven't had the

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opportunity to see the vehicle, personally. Terry - it's difficult to take someone else's photographs and someone else's work and see all of the things that you might want to see. An outside fire investigator brings a certain background to his investigation, his or her background, I bring my background as an automotive engineer and an electrical engineer to that inspection or that investigation. So we have different perspectives.

Q. Okay. In this particular case, as I correct, that the vehicle is unavailable for inspection, by either you or the plaintiff's expert witness,

A. That's what we were informed last fall, yes.

Q. Is that correct that you were not able to do any of this particular fire case. What information you have reviewed, what documents you've gathered together to assist you in learning what you've learned about this particular case and this particular fire.

A. When I first was given the assignment of this particular case, we had been given the VIN. I went through our computer system and pulled the information on that vehicle and discovered that

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it's build date was actually prior to the recall that was a part of the allegation of what started the fire.

Q. Okay. Let me step you there for a second. Do you have with you the report or the document that was produced by running the VIN on this particular car?

A. Yes. In our analytical program system, I run what's called a vehicle information report and I have a copy of it right here.

Q. Let me have that, please.

A. Okay. Actually, the first two pages are the report itself.

Q. All right. Is this report is a two page document, is that correct?

A. Yes, sir.

MR. STALL: Let's mark that as Defendant's Exhibit 1.

(Vehicle Information Report marked as Defendant's Exhibit Number 2 for Identification.)

(Deposition went off record for a brief period of time.)

Q. Mr. Hoffman, you just mentioned a vehicle information report which we have had marked as

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Defendant's Exhibit Number 2. If you would, go ahead and sort of walk us through what this report tells you, and again just tell us, on the record, what you had to do to generate this report.

A. Okay. The, the report itself is just, almost as it says at the top there. It's a general vehicle information list. It lists the VIN, which is the way to identify that individual vehicle. Identifies its model and year. Where it was manufactured, the day it was produced. Where it was sold, the day it was sold. What type of a sale it was, whether it was a retail sale, a fleet sale or a lease. Again, what geographic area of the country it was sold in. And then it has a listing of some of the major components of the vehicle.

Tells you which engine is in that vehicle, which transmission, which body style.

Q. Okay. Let's go through and have you tell us specifically that information on this vehicle that's involved in this particular lawsuit. And I don't want you to comment on everything we have, like the size, color and all of those things, but go through the basic information at

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the beginning and then tell us anything that you think is important with respect to the issues involved in this case.

A. Okay. Well from the top. The vehicle VIN is listed there. Right underneath it, is that this vehicle is a 1982 model year vehicle. Now some - the inventory and dealer, their code number. And I don't know what, what dealer that is, but they have code numbers for all of the dealers, the type of vehicle that we're talking about. The vehicle line, which is that car, called FWD or FWD, within a company. Those are our design engineering project numbers for it.

Q. If I could stop you one second. I think you said FWD.

A. I'm sorry. That would be 36 -

Q. (Looks like 36 on mine.)

A. Yes, you're right. 1982, FWD. The '81 to '87 is the brackets, means that this design style was carried over from the '81 model year through the '87 model years. It is marketed by the Lincoln Mercury division. It is a two wheel, left hand rear drive. It is a four door sedan and it what's called a signature series version of the town car, which means it has a few more

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options is it than the regular standard vehicle.

The right hand engine there in that set described what engine is in it, is a 4.3 liter, single wear head one, electronically fuel injected engine built in North America. It's a V6 engine. The transmission that was put in it, is a four speed automatic transmission, also built in North America. And we call it internally the AOD transmission, which means automatic overdrive, just an acronym for it.

Q. Now, right next to that transmission information, there are a few hand-written numbers and letters --

A. Right.

Q. -- Where handwriting --

A. I -- those, those are my notes. When I discovered that this vehicle's build date was -- which is in the next section of this report, when I discovered that the vehicle build date was October 17, 1991, I realized that it was built before the recall date. And I tried to dig deeper into the company records to determine how I could show that on, on this form.

And when I went back and looked at the sales literature that we published for our

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dealers to use, when they're introducing the vehicle to a customer. I discovered that there were several features that were introduced to the town car, later in the '90 model year, than the beginning of the model year. One of them was the transmission and that's why I made those notes here. The 4AT and the 4EP are the ordering codes that are put into an order by the dealer. The 4AT stands for an AOD transmission. The 4EP stands for an AOD-E transmission, which is similar to the AOD, except that it is electronically controlled with the engine control module, rather than mechanically controlled, as, as a standard automatic transmission was controlled in those, you know, in previous years.

And so that's what gave me one of the clues to the fact that this vehicle did not have a speed control deactivation switch in it, because the sales information said that the electronic automatic overdrive transmission and the speed control and a couple of other features were all introduced later in the model year on the town car that year.

Q. Okay, let's walk through that, before we turn

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away from Exhibit Number 1. In the second section, where it says build information. It has a production date of October 17, 1991. Is that what you are referring to as when this car was finished?

A. Yes, sir.

Q. Okay, anything else on this document, at this time, that you want to discuss, before we move on to some other things?

A. Not specifically. Like I say, if it does have the date that it arrived at the dealer, which was about a week later, the 24<sup>th</sup> of October, was sold the 11<sup>th</sup> of October, under a red carpet lease to a retail customer. And then the second page, just has some of the features listed.

Q. Now, let's talk briefly about the recall that is involved, that involves 1991 town cars. You mentioned a few minutes ago, that the production date of this particular vehicle is outside of the recall group. Tell us what the recall is, what the recall was for and what vehicles it encompassed?

A. The recall is our number 80-0-11. It was on the town car, Crown Victoria and Grand Marquis vehicle line for 1990 and 1991 model versions,

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that were built before November of 1991 and -- I'm sorry, after November of 1991 and before November of 1992. A lot of people don't, don't know it, outside of the auto industry, but we actually introduced a model year of vehicle about four to six months before that calendar year actually started.

So we talk in terms of model year and calendar year. The 1992 model year for most of our products start in July or August of calendar year 1991. So we were about three months into the model year in November.

Q. What was the purpose of the recall that involved town cars and others -- and we'll just focus right now on town cars, because what this is. What was the reason the recall of town cars, that were built between November of '91 and November of '92?

A. We had received a lot of concerns and calls from different sources, as had the National Highway Traffic Safety Administration. And we began an investigation, as did the National Highway Traffic Safety Administration on rather high incidents of fires occurring in town cars at that time, 1991 model year town cars,

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specifically. So put a team of engineering people together who were responsible for some of the component parts in the general area that we thought these types were starting. And they began to study possible failure modes that could be occurring that might stress a line to start. In the course of their studies, they went out to different dealers and they went and inspected various customer vehicles and found that the speed control deactivation switch in some of these was actually being damaged or was actually burned.

And they, as they begin to concentrate on that specific part and discovered that there were some issues with small production lot of them that were built back at their introduction, in this time frame.

Q. Let me stop you there and let's go off the record for just a second.

(Deposition went off record for a brief period of time.)

Q. Mr. Hoffman, I stopped you for just a second because your documents were delivered back to you. We're talking about the recall. Do you have any documents that will assist us in reviewing

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the recall that you're talking about?

A. Yes. This, this document, which you have a copy of right there has Ford logo on the middle of it, that says, Safety Recall 99-8-18 on the top.

MR. SWARTZ: If I can borrow yours for a second, so that the court reporter can mark it. This is Defendant's number 1.

(MARKED EXHIBIT AS DEFENDANT'S EXHIBIT NUMBER 1 FOR IDENTIFICATION.)

A. This is a copy that I took off of our, our corporate records, again, this is something that is stored in our computer system. It is a complete copy of the entire bulletin that went out to our dealers. It describes the vehicles that are affected. It describes the reason for the recall. The service actions that the dealer needs to perform on those vehicles and the fact that we were going to send out notification letters to all of customers, so that the dealer was warned about that in advance.

One of the things in this document that suggests what I had discovered about the transmission option, is on page four of nine, is you're looking at the small switch is lined left hand corner. It happens to be attached

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to the recall. Under the heading of labor allowance, one of the operations that we determined the dealers might need to do, was the first one listed there, which was inspection only. So determined after the initial mailing of the recall, we found that some of the dealers were calling in and saying that the vehicle had an old style speed control system on it, which did not use the deactivation switch. And so we had to write a supplement -- as a matter of fact, the copy that I brought here. By at the very beginning the subject says, safety recall 99-8-18, including supplement number one. And that's what this is, it's actually the supplement number one.

And the reason we supplemented it was to add this inspection operation into the dealers, so that, if they did get the vehicle in and start working on it and found that it didn't have the right system, the right speed control system on it, that the dealer could still bill Ford for their work done to that point. Well, because it had the old version activated speed control system in it, it did not have the switch which was subject to this recall. So we,

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actually what that indicates, what that indicated to us at the time, was that when we selected the date of November 1, 1991 as the beginning of the recall population, that we knew we had gone back far enough, because we had vehicles that were still being built with the old system on it.

Q. This -- am I correct that the entire effort of this particular recall, involving some '91 town cars and other vehicles, was a particular speed control deactivation switch, is that correct?

A. Yes. Actually it wasn't just that switch, that particular switch has been used, you know, on other products. It was a small lot, to the best of the team's ability, it was a small lot of those parts that were built on a certain time on a certain piece of equipment.

Q. Okay. But after the purpose of this recall was for us to look at that particular switch as a potential cause, possibly of fires in these, in vehicles?

A. Yes.

Q. And it's my understanding not every switch of this group would qualify as being potentially problematic, but some of them --

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A. Right.  
Q. -- Was some of them that were made worse potentially problematic?  
A. Yes. The problem that the recall team had at the time was determining exactly where these parts had gone into the production stream. The recall covers a twelve month period because they weren't certain, exactly where the parts went and how many there may have been in that, in that lot of parts, that group of parts. So when we select what like that, if we can't identify specifically, this part went in this vehicle, we will try to cover on the side of having more vehicles brought in and looked at rather than less.

It's a lot easier to look at a vehicle and check it out and make sure it's okay, rather than have it left out there and not know.

Q. And the direction to the dealerships, as they were going to be seeing these cars brought in on recall notices. Were they then directed to ultimately replace that part? Is that what they were told to do?

A. Yes. There was an interim repair and then a final repair put into the recall, in an effort

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to try and get it out quicker. We know that once the recall was begun, that we would have to have built up some parts for the dealerships to use in the recall. So we gave them an interim repair, told them to dis-connect the switch that was on the vehicle, tape up the connectors and leave it that way and have the customers come back in when they did have the parts. They would make an appointment for the customer to come back in and replace the switch.

Q. If the dealership came across a vehicle that was, that had the prior system, what you refer to as the vacuum system, what were they instructed to do with those cars?

A. Since those vehicles didn't have the switch, they were told to just give the vehicle back to the customer and to bill Ford Motor Company for their technicians time in looking at the vehicle and finding that fact out.

Q. So if one of those vehicles came in and had the old vacuum system, it was, it had nothing to do with the recall. It just had been included by this broad rush of a time period of what were you wanted to get pulled in?

A. Yes.

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Q. Do you know when the switch from vacuum system to the speed control deactivation switch took place in the production of the time car?

A. Not right down to the very date, the very day. I know that it did occur sometime in the time frame around November of 1991.

Q. And as you've testified already, this car, in this particular case was built in October?

A. Yes, sir.

Q. Apart from the fact that it was built in October and prior to the recall population, do you have any other information that you have some source that indicates to you that this particular car had the vacuum system and not the speed deactivation switch?

A. Yes. As I reviewed [REDACTED] notes and original report and his photographs, of course, I was -- having looked at a lot of these vehicles in my own inspection, I was looking for the switch itself. And at first glance through the pictures I didn't think that Mr. Kennedy had gotten a picture of enough detail, but as I went back and looked in more detail and used a microscope to actually look at these pictures -- these are only copies, but I'm fairly

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confident that picture number thirty-eight actually shows the area where the switch should be located and the switch is not present where it belongs. I brought along a, an exemplary part --

EX. STAMP: Let us take the page with the picture on it first and have the court reported mark it --

(FOOTING MARKED AS DEFENDANT'S EXHIBIT NUMBER 1 FOR IDENTIFICATION.)

A. Number thirty-eight, shown here at the bottom.

Q. Back this way here.

A. It's the one at the bottom there, number thirty-eight.

Q. Okay. If you could tell us what picture number thirty-eight shows you that lends support for your opinion that this car did not have a good deactivation switch in it?

A. Okay. Picture number thirty-eight was taken by Mr. Kennedy in his February, 1997 inspection of the vehicle. It is basically the driver's side rear quarter of the engine compartment, looking at it from the front of the vehicle, so it's basically, Mr. Kennedy was standing in front of the front bumper, in front of the driver's side

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of the vehicle, shooting a picture of the engine compartment just right in line with the steering column. So he has the brake master, the brake master cylinder and the driver's side, half the engine and he's also got the driver's side front fender and the driver's side front wheel, depicted in that picture.

Q. I just want to be clear on a couple of things for the record. You testified earlier that this vehicle's whereabouts are unknown now, and you've never had a chance to inspect the vehicle yourself, correct?

A. Correct.

Q. Mr. Kennedy, who you are referring to, did in fact have a chance to look at this particular vehicle involved in this case, is that correct?

A. Yes.

Q. And these photographs we're talking about, or this one photograph in particular, is actually a photograph of this particular town car, after it's fixed, is that correct?

A. That's what I've been told and that's the assumption I've gone on right from the beginning.

Q. Okay. Go ahead.

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A. He's documented his pictures rather well. In his report he's got the name of the insurance claimant in this, and it finds the driver all the records that I have seen seem to indicate that this is the vehicle. Although I don't believe the VIN is actually shown in here, but I'm assuming that it was, it was that vehicle and that it was controlled correctly before Mr. Kennedy saw it.

Q. All right. Tell me when the picture shows you.

A. The picture shows me what is called the proportioning valve, which part of the anti-lock braking system, which is mounted on the frame rail, right underneath the brake master. And that proportioning valve is the location where the speed control deactivation switch was mounted into the vehicle, in the electrical system of the revised town car. When they, when they introduced systems like this speed control were introduced and I can see the valve rather clearly, but I don't see the switch at all.

So it appears like it is a proportioning valve without a switch in it, which the only way that that can happen in a '91 town car is if it was built with a vacuum actuated speed control

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system, because speed control is a standard feature on all town cars.

Q. Just if you would for the record, and I don't know how difficult this will be, if you could hold the photograph up facing the camera and point to the part that you're referring to -- this is gonna be tricky --

A. Is it easier if I hold the picture still for you? Or, okay.

Q. And I'll have you mark it subsequently --

A. Okay.

Q. -- just make a circle around it, just as --

A. Trying to do this backwards and without saying, so, it's kinda tricky, let me step up. Okay. This is the brake master. This white colored portion here is the brake master cylinder and directly beneath that, mounted to the frame rail is where the proportioning valve are. And there is a small little tiny white square that you can see right there, and that is the top of the proportioning valve.

Q. Okay. Now if you would, go ahead and just --

A. This little spot right here --

Q. -- I'm going to go ahead and have you draw a circle around that spot, just --

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A. On this copy of the photograph?

Q. -- on the copy, yes. So when we look back we can see that --

A. I'm not sure what the best tool to use.

Q. Okay. Does that show up okay, you tell me again what that, what that valve is telling you about what type of system was installed in this car.

A. Well, as I said, the speed control feature is standard on all town cars, so if you buy a town car, it will always have speed control.

Q. And is speed control the same as cruise control?

A. Yes.

Q. Okay.

A. They are synonymous. The change over from the vacuum actuated speed control to the electrically operated speed control was done sometime in the November time frame in 1991 on the town car. And ABS was always a standard feature and so was --

Q. Anti-lock brakes?

A. -- anti-lock brakes. So the proportioning valve is on vehicles. The speed control is on all vehicles. If it is a vacuum actuated system, the proportioning valve will not have an electric deactivating switch, because that system is just

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1 a vacuum dump valve inside. And if it does have  
2 the electrically actuated speed control system,  
3 it will have the switch mounted in the  
4 proportioning valve. I brought along an  
5 exemplary part here. This is a service for a  
6 1992 van car, and this is basically the part  
7 that we're talking about in the picture --

8 Q. For this example you have, it's, for the record,  
9 is not from any particular car, and certainly  
10 not from this car --

11 A. No, this --

12 Q. This is just a part --

13 A. This part was one that we purchased from a Ford  
14 dealership, this is the service part that the  
15 dealerships will get if they order a  
16 proportioning valve assembly from us. It will  
17 have the switch in it, it will have  
18 proportioning valves, which are these blocks  
19 here, it'll all be mounted together on this  
20 bracket for installation in the vehicle.

21 Q. And now this one you are showing us an example  
22 of, this is for the newer electronic  
23 deceleration switch system, is that correct?

24 A. Yes. That's correct.

25 Q. Tell us what it has in it that's different from

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1 what the photograph shows you of the one that  
2 was involved in the, that was on the vehicle  
3 involved in the fire.

4 A. It has the speed control deceleration switch,  
5 which I didn't mention is there too much, I can  
6 take out. This is the actual deceleration  
7 switch, there's the subject of the recall. And  
8 since the engineers wanted it to be activated  
9 when there was, when the brakes were really  
10 actuated, they mounted in the brake line, and  
11 the best place to do that was right here in this  
12 proportioning valve, because the brake lines  
13 were already running through there. So this gave  
14 them a place to mount the switch very  
15 conveniently. And what they did basically, was  
16 they took the proportioning valve that was on  
17 the other vehicles, the previous speed control  
18 system, they added a little bit material and  
19 machined the hole and mounted the switch.

20 And so, this flat surface right here in the  
21 picture is just that. It's basically just a flat  
22 surface like the valve went to it. And it does  
23 not have a threaded hole in it. It does not have  
24 a switch mounted in it and if it did, this photo  
25 picture number thirty-eight, would not have that

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1 little square white object does in there. It  
2 would have a round white object, because,  
3 typically in a vehicle fire of this magnitude,  
4 the plastic portion of the switch portion of the  
5 switch, which is where the electrical contacts  
6 are, typically either burns away or melts  
7 sufficiently to fall off and the only thing  
8 that's left is the retaining ring. So what you  
9 would see looking down in there is a rubber  
10 bright round circle, which is the outside of the  
11 ring and a rather dark center circle inside of  
12 it, which is the internal spring of the switch.  
13 Now when you talk about that, Mr. Hoffman, first  
14 of all, just to be clear again, the little part  
15 that you showed out and set down, and I think  
16 that was shown on the video --

17 A. That?

18 Q. -- the part that you see showing out right  
19 now --

20 A. Oh-uh.

21 Q. -- that little part is actually the switch that  
22 is the subject of the recall, is that correct?

23 A. Yes, sir.

24 Q. Okay. Have you seen two cars that have burned  
25 and had this switch in it and looked under the

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1 head after the fire had taken place and been put  
2 out.

3 A. Have I seen the vehicle?

4 Q. Have you seen vehicles --

5 A. Oh, yes, yes.

6 Q. -- like these. Now in these vehicles, have you  
7 been able to still see the metal ring part of  
8 that switch attached to it --

9 A. Yes.

10 Q. -- to that, I forget what you call the bigger  
11 part --

12 A. This is called a proportioning valve.

13 Q. -- the valve?

14 A. Yeah.

15 Q. Okay. Have you seen the metal ring attached  
16 still to the valve assembly, after these fires?

17 A. Yes.

18 Q. And I assume because it's metal, that part does  
19 not get destroyed in the fire?

20 A. Not typically, it's aluminum, which will  
21 eventually burn if the temperature is high  
22 enough, but in most of the vehicles that I have  
23 seen, the retaining ring is still in tact.

24 Q. And that retaining ring and any aspect of that  
25 switch is not visible in the picture that you've

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1 shown to the camera earlier?

2 A. Not only is the switch not pictured but, because

3 of the shape of the object I saw in this

4 picture, it's telling me that it actually the

5 face of one of those valves, because instead of

6 being round like the end of the switch, it's

7 square like the facing of this surface on the

8 valve.

9 Q. And this is, in the photograph that we're

10 looking at today, it's relatively small. But

11 you've looked at that under a microscope -- Oh,

12 I'm sorry, under a magnifying glass, is that

13 correct?

14 A. Yeah, I used a magnifying glass sometimes to

15 look at the details of photographs.

16 Q. And what you looked at that under magnification,

17 are you comfortable in your statement today

18 that there is no place for the switch, the

19 electronic switch, nor is there any evidence

20 that the switch existed on that piece that

21 you've looked at?

22 A. That's, that's correct. Based on this picture

23 and what I know from our field records of this

24 vehicle, this vehicle did not have an electric

25 speed control system on it. It had a vacuum

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1 activated speed control system on it.

2 Q. The photograph that we've looked at, in addition

3 to what you've said of not supporting the idea

4 that a switch existed on this car, does the

5 photograph support what you believe it should

6 look like if it had the vacuum system?

7 A. From the level of detail that I can see, yes.

8 But, I -- there are some of the pieces left that

9 I would point to, to say he-he, this is the part

10 that proves that the vacuum system was there.

11 Q. But it does not a spot that allows for the

12 electronic switch to be inserted on it?

13 A. That's correct.

14 Q. Anything else about the photograph that you want

15 to discuss? I know you have some other documents

16 here that we've made copies of, that we've not

17 talked about yet and we'll ask you to go through

18 those, but anything else about the photograph?

19 A. Just basically to, you know, in, in

20 reviewing Mr. Kennedy's request and also in

21 reviewing [REDACTED] deposition, the other

22 expert who looked at these photographs, I tend

23 to agree with some of the things that both of

24 them said. That it does appear from these

25 pictures that this vehicle was involved in a

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1 fire. The fire did appear to progress from the

2 engine compartment to the interior and through

3 the vehicle. And that the damage under the hood

4 was of a significant enough nature to make

5 identifying the cause and origin of this fire

6 very difficult. And I took that one step

7 further, having not seeing the vehicle myself,

8 and said that I think it's impossible. I would

9 never sit here and try to convince you that I

10 can tell you what started that fire, because I

11 just don't have enough data to do it. Having not

12 seen the vehicle myself.

13 Q. And I'm going to ask you to touch on some those

14 comments a little bit more, in a little more

15 detail in just a few minutes. Let's talk about

16 any other documents here, that are in your

17 possession, what they tell you and what they may

18 tell us and tell the jury about this car. By the

19 way, we want the two that's been marked.

20 A. Okay.

21 Q. To just at least make a photo-copy of that.

22 A. The photograph number thirty-eight?

23 Q. What other documents do you have here and tell

24 us what they mean to you, in respect to this

25 case?

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1 A. Okay. The other documents that I had brought

2 with me and that we copied, were basically just

3 in support of what I was saying earlier about

4 the option content of the vehicle. This, this

5 document, and I assume you want to mark them, is

6 that --

7 Q. I do.

8 A. Yeah, okay.

9 Q. Tell me how many pages this document is.

10 A. This one is three pages that are taken out of

11 the 1992 Buick car sales literature that we give

12 to our dealers when the vehicle is introduced,

13 so that they have information to share with the

14 customer about the features on the vehicle. I --

15 MR. SWARTZ: We're going to staple it as it's

16 easier for the court reporter to keep track of

17 and mark it as Defendant's Exhibit Number 8.

18 (DOCUMENT MARKED AS DEFENDANT'S EXHIBIT

19 NUMBER 8 FOR IDENTIFICATION.)

20 A. I went and looked for this when I discovered the

21 build date to recall difference, and what this

22 tells us under a section called, functional --

23 what's new for '92 is what is listed here on the

24 top of this form and it says functional things

25 that were new. And one of those is, electronic

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automatic overdrive transmission, but in parenthesis it says, late availability behind it. And then goes on to list electronic speed control with tap up, tap down, also says late availability behind it. And there are a couple of others down further, the brake shift interlock feature, also has late availability listed behind it in parenthesis.

These are features that were brought into the vehicle after what we call job one, as of the launch of 1981 model year, which occurred probably in July or August of '81.

- Q. If I could stop you there for just a second. Are these two functional features that you're talking about, electronic automatic overdrive transmission and electronic speed control with tap up, tap down. Are these two functions representative of having the deactivation switch system on the vacuum system?
- A. The electric speed control with tap up, tap down, the only way to implement tap up and tap down is with the electric speed control system.
- Q. Okay. So that is available only if the vehicle itself has the electronic deactivation switch installed?

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- A. Right. Basically, this, this line on this form is the, the sales language if you will, or the words that the sales people can use to more readily describe to the customer what that system does.
- Q. And the fact that underneath it in parenthesis, it says late availability, indicates what?
- A. It means that it was not available to order on the time car in the early portion of the model year. Say from August of '81 until whatever that feature was finally brought into production, which was November, to the best of our knowledge. And I just brought this along, basically to support what I was saying earlier about the vehicle not being -- you've got evidence that's, okay. -- of not being -- not having the speed control switch on it.
- Q. What other documents --
- A. The other two things that I brought that are behind that, there are both two page documents. One is titled section 10-43B, speed control system, Lincoln Town car, late production vehicles, and section 10-43B, speed control system, Lincoln Town car early production vehicles.

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RE. STAFF: If I could borrow those for just a second to let the court reporter mark them --

(10-43A MARKED AS DEFENDANT'S EXHIBIT NUMBER 4 FOR IDENTIFICATION.)

(10-43B MARKED AS DEFENDANT'S EXHIBIT NUMBER 7 FOR IDENTIFICATION.)

- A. These pages were copied out of our 1981 Lincoln Town car service manual, which is available to -- I think it's available to anyone, actually, that calls the publishing company, they can buy our service manuals.
- Q. Okay. We have marked the one that say 10-43A as Exhibit Number 4 and 10-43B as Exhibit Number 7.
- A. Okay. Is it easier to --
- Q. Tell us --
- A. -- go by exhibit number then, at this point.
- Q. Whatever is easiest for you, just refer to which exhibit you're talking about.
- A. Exhibit Number 7, is the early production vehicle and the reason that I brought these two pages is that on the second page there is a small picture at the top that shows what the vehicle speed control system looks like and where its major components are, so if you flip to the second page of each of those exhibits,

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what you basically have is two totally different pictures. One that shows a vacuum actuated system in diagram 10-43B-2, which is basically just page two.

- Q. Okay. That's page two of Exhibit Number 7.
- A. Of Exhibit Number 7. Okay. It shows a device over here called a speed control servo assembly, and it shows some hoses and lines going across the brake booster, over to a valve assembly, which is called a vacuum manifold, which is then plugged into a vacuum manifold assembly and it basically shows all the vacuum lines that are used to operate the speed -- to supply vacuum to the speed control servo, which then actuates the throttle cable to run the speed control.
- Is the other exhibit, Exhibit Number 8, page two, that's 10-43B-11, there is a picture of a similar area on the vehicle that shows the same number seven -- there's, there's a little table underneath that shows all the parts that are noted up on the picture. Page number -- or item number seven on that page is the servo and bracket assembly, and you can see it's a totally different device, it's a little box basically, as opposed to this big round circular device.

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This is the new speed control system with an electric motor that runs the cable, rather than the vacuum system, the vacuum servo.

Q. And these two vehicles are showing that there was a change in the system in --

A. Again, that --

D. -- early production --

A. I brought them along to try and supply the flow of logic from, you know, we found this vehicle was built early, this is what our documentation to the sales people said was the difference between the late and early, this is what the service documentation says. So it just kind of following the logical flow of information that we have, you know, in the company, that, that indicates that this vehicle didn't have, didn't have a deactivation switch on it.

(Deposition went off record for a brief period of time.)

(PART HEARD AS DEFENDANT'S EXHIBIT NUMBER 5 FOR IDENTIFICATION.)

Q. Mr. Hoffman, we, before we came back on record, we heard up the exemplary part that you were showing us for informational purposes, we've marked that as Exhibit Number 5. With respect to

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Exhibit Number's 4 and 7, that we were talking about prior to our break, is there anything else that you wanted to point out about those documents, or are you ready to move on?

A. No. No. I just thought -- I brought them along to try and show my, my flow of logic as I went through my analysis to determine that this vehicle did not have a speed control deactivation switch on it.

Q. There was one other document, a one page document that was in the list of materials you handed to my --

A. Yeah --

Q. -- what is that document?

A. Going back to, which one is this, Exhibit Number 3, the vehicle information report, one of the other reports that I can get off of the computer, is in brackets on the top of that form, where it says, related claims. That will link me with the service reports and I can get reports of each time the vehicle was in for service. Since there are kind of long and elaborate and have a lot of, what I call, you know, Ford lingo in them, I, in sort of these pages, I've put together a one page chronology

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of events just for my own purposes, just to kind of organize a whole pile of paper into one nice, neat little list.

So what I did was I put together this chronology and it's basically nothing more than all of the information that I found in the vehicle information report and in our warranty recording system on the vehicle in question.

Q. Okay.

MR. STANIS: And we've marked that as Exhibit Number 6.

(CHRONOLOGY REPORT MARKED AS DEFENDANT'S EXHIBIT NUMBER 6 FOR IDENTIFICATION.)

A. And basically it does nothing more than go through some of the things that we've said here and some of the other information that I had picked up from our warranty reporting system.

Q. Just as I'm glancing at that document, I see a, for example, there is a, there is a work at 9,441 miles dated August 25, 1983. And then the next entry is at 12,307 miles dated January 24<sup>th</sup>, 1984 -- what is, why is there that gap or what does that gap tell you, what do you learn from that?

A. Well the gap tells me one of two things. The

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system that I have available to me is only the Ford warranty system, so if the vehicle is not brought into a Ford dealer under warranty and the dealer reports that information back to us, we don't have any record of the vehicle being serviced. Which doesn't mean it's not being serviced but, it does raise the question in my mind, you know, that it wasn't serviced at a Ford dealer, is one question, the other question is was it serviced at all. And, I have no records, you know, to prove one way or the other --

Q. What it does tell you is that it was not serviced at a Ford dealership, is that correct?

A. It was not serviced at a Ford dealer very often.

Q. Right. I, I mean when I say wasn't serviced, I, I was referring to between --

A. Oh, in between --

Q. -- 9,441, thirty two thousand.

A. Right, there -- those, those gaps mean that there is a gap in our records, not necessarily that there's a gap in the service on the vehicle.

Q. Okay.

A. That just means that it was not brought to a

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Ford --

Q. It was not serviced at a Ford dealership.  
A. -- a Ford dealership.  
Q. It may of been serviced at a Jiffy Lube or places like that, that wouldn't show up on here.  
A. Exactly.  
Q. Okay. Anything else about this particular chronology?  
A. No. As I said --  
Q. That maybe you haven't discussed earlier?  
A. I, I just try to, to bring all of the information from, from a bunch different forms all together in one spot so that I can look at it rather outside. Farther down, you know, I mentioned that was reported at the first scene and what was reported by Mr. Kennedy and his report that he published after his inspection.  
Things that, you know, I thought were important to the, to the case. You know, he made the comment that, and I think Mr. Johnson also kind allowed to the fact that with the level of damage under the hood of this vehicle it was, it was going to be hard to determine what the cause and origin was.  
Q. All right. I want to ask you a few other

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questions in a little different line. You made a couple of references during some of your statement to Mr. Johnson, Bill Johnson. Tell me who Bill Johnson is and what you understand his role in this case to be.  
A. Bill Johnson, to my knowledge, is a, a fire investigator, he's a, I think, what we call a forensic engineer. I have met Bill once on a vehicle inspection that we were back asked to go and view and I, I found him to be rather, rather a good engineer. He had some, some pretty good knowledge and, and had done some investigation like our brake pressure switch small and into the part itself. And seems to be a pretty good investigator and a pretty good forensic engineer, as far as I am told.  
Q. Is it your understanding in this case that Mr. Johnson was retained by the plaintiff's attorneys to assist them in looking at this vehicle information and making a determination as to the fire cause?  
A. Yes. That was my understanding.  
Q. And in fact, have you had an opportunity to review a deposition transcript of Mr. Johnson's deposition?

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A. Yes.  
Q. If you could talk to us about -- well, first let me ask you when you reviewed Mr. Johnson's deposition transcript.  
A. This was late, last night, when I got into Myrtle Beach.  
Q. Okay. Now, if you could summarize your understanding of Mr. Johnson's deposition testimony.  
A. Basically I got the impression reading the deposition that, that he was in pretty much the same situation that I was in. That he didn't have the opportunity to see the vehicle, as he was a little bit --  
MR. O'BRIEN: Object. Witness is characterizing what's the position of Mr. Johnson.  
MR. STARR: You say during the question still.  
A. Okay. So I kind felt the kind of a hindered spirit sort of feeling toward him because I was basically in the same situation.  
Q. Mr. Johnson didn't have, wasn't able to actually view this vehicle either, was he?  
A. Right. And I was kind of under the impression

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as I reading his deposition that he had a similar set of materials to me in his review except for the fact that I had the Ford, you know, company information that, that's not available, you know, to, to him or to people outside the company. So, I know when the vehicle was built but I also know what was going on as far as the, the speed control feature change over and when that occurred.  
So, he, he had other experience as he described in his deposition, as a matter of fact the one case where I met him was another vehicle of this, of this type that was part of the subject, part of the recall. And that's where I met him originally. And, as he, he basically had similar information to what I had, plus he had the experience of having tested several of these vehicles in other cases that he has worked in the past and he basically made, came to the conclusion that this vehicle was the same of these other vehicles and quite a few of those other vehicles he's seen have had a fire caused by the speed control deactivation switch, that this vehicle was probably one of those as well.  
Q. Did Mr. Johnson in his deposition testify that

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1 he was, that he believed that the, this vehicle  
2 contained the deactivation switch?

3 A. I'm not sure if he said positively whether the  
4 vehicle contained the switch or not, I think he  
5 basically concluded that if it's in the, the  
6 area of that small population it's got the  
7 switch in it. And if it's got the switch it's  
8 highly probable that it would of caused the  
9 fire, I think so, kind of -- that's the feeling  
10 I got from reading the deposition of what his  
11 logic was.

12 Q. Based upon your review of the materials that  
13 you've discussed with us, your inspection of  
14 photographs and these other documents that you  
15 viewed or today that we've marked as exhibits,  
16 can you state to a reasonable degree of  
17 engineering certainty whether this fire in this  
18 case was caused by an electronic deactivation  
19 switch?

20 A. I can state unequivocally, I think that there  
21 was not a switch in this vehicle and that the  
22 switch did not start the fire in this case.

23 Q. Based upon your inspection of these documents  
24 and photographs involved in this case, can you  
25 state to a reasonable degree of engineering

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1 certainty that the deactivation switch was not  
2 present in this vehicle?

3 A. Yes. I think I can.

4 Q. And when, and when I'm referring to the  
5 deactivation switch I'm referring to the one  
6 that is the subject of recall, 89-0-18.

7 A. Yes, sir.

8 Q. If this recall switch was not -- I'm sorry, the  
9 deactivation switch subject of the recall was  
10 not in this vehicle, are you able to, based on  
11 your inspection of what's been available to you,  
12 are you able to make a determination to a  
13 reasonable degree of engineering certainty what  
14 caused this fire in this case?

15 A. No, sir. I, I would never give an opinion on  
16 something based on the, the level of data that I  
17 have available to me at the moment.

18 Q. And, and that answer, is that answered based  
19 partly on the fact that you have not had the  
20 chance to inspect this vehicle itself,  
21 physically --

22 A. Not just inspect the vehicle but I have not seen  
23 any fire scene photographs. I was, I did not  
24 have the opportunity to inspect the fire scene.  
25 The fire department report was not very specific

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1 about cause and origin, just basically about the  
2 fire fighting that, that occurred. And I  
3 haven't been able to interview any witnesses  
4 myself. I've been through the grapevine  
5 some things that have, you know, have been said  
6 by witnesses, matters of fact I think Bill  
7 Johnson had some information on what Dr. Hodges  
8 the car owner had said.

9 So without all of those other sources of  
10 data, I don't feel it's appropriate to, to make  
11 an opinion of cause and origin on a fire. It  
12 kind of goes against the guidelines and the  
13 National Fire Protection Association guidelines  
14 so, I would not offer an opinion.

15 Q. Can you say to a reasonable degree of  
16 engineering certainty that the subject of the  
17 recall, 89-0-18, and the, the parts involved in  
18 that recall, were not the cause of this fire?

19 A. Yes.

20 Q. I think that's all I have for you right now.

21 ~~RECALL-RECALLING BY MR. O'BRYEN.~~

22 Q. How many cases are you working with involving  
23 fires, engine fires in 1992 Lincoln Town cars  
24 and other vehicles that are subject to this  
25 recall?

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1 A. As I said earlier, I believe I've got about  
2 twenty or twenty-five cases.

3 Q. And when you say cases those are cases that are  
4 in litigation?

5 A. Some are in litigation. Some of them are  
6 insurance claims, some of them are, as a matter  
7 of fact, there are a couple of law suits and the  
8 first one kind of deactivating because a couple of  
9 the law suits actually have multiple vehicles in  
10 them. So there, there may be one law suit but I  
11 may have listed it two, three, four, you know,  
12 different vehicles.

13 Q. Okay. You mentioned that you worked with Mr.  
14 Johnson on a case, where was that case?

15 A. Wilmington, North Carolina.

16 Q. Okay. And do you remember the specifics who,  
17 who were involved in that case?

18 A. No. I don't.

19 Q. Type of vehicle it was?

20 A. I'd have to go back and look at that particular  
21 file. I, I can't recall off the top of head.

22 Q. And can you tell us how many cases there are  
23 where these vehicles with this device have  
24 caught fire, that you're aware of?

25 A. Again, I'd have to, to do some research to give

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1 you a definitive number but, I do believe  
2 there's about two hundred incidences, total  
3 incidences out of the two hundred and seventy  
4 nine thousand vehicles that, that I'm aware of.  
5 Somewhere between two or three hundred,  
6 Q. And are you aware of any cases where there's  
7 been an engine fire where there is not this  
8 device which has been recalled in the engine?  
9 A. In a '92 or a '93 town car?  
10 Q. Well, in -- cases that have been investigated by  
11 Ford where there was a fire and in the engine,  
12 and it was determined that this device was not  
13 in the engine?  
14 A. I have looked at other vehicles in the course of  
15 my job that do not have this part in them, in  
16 that --  
17 Q. Right. That's it. And, in fact when you looked  
18 up those they had burnt; is that correct?  
19 A. Yes.  
20 Q. Okay.  
21 A. That's not exclusively true, I do look at other  
22 vehicles that have other allegations against  
23 them that are not fire related but, I didn't think  
24 they were pertinent to what we're talking about  
25 here.

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1 Q. I understand. And you agree with me, would you  
2 not, that a vehicle is not supposed to catch fire  
3 like this?  
4 A. Like this. I'm not sure what you mean by like  
5 this --  
6 Q. We as consumers's of vehicles do not expect that  
7 if we park a car in a drive way and turn it off  
8 that it's, will catch fire.  
9 A. It's definitely not designed to do that.  
10 Q. Right. It's not design to do that. The recall  
11 that you, that came about, could you give me  
12 more details as to how that happened? Was, in  
13 the National Highway Traffic Safety, is that who  
14 --  
15 A. Yeah.  
16 Q. -- you work with?  
17 A. They were, they were one of the groups basically  
18 that that helped them. Helped get the message  
19 rolling along.  
20 Q. Yeah. And how did that come about that, did  
21 Ford contact them and say listen we have a  
22 problem or were you contacted by the government  
23 agency?  
24 A. Well, it was. We went back and, and kind of  
25 researched this after the fact and tried to

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1 figure out what happened and what was going on.  
2 Q. Why did you do that?  
3 A. As part of the recall. Investigation. We wanted  
4 to know, you know, why didn't we know quicker,  
5 why, why didn't we know, you know, better input  
6 data basically is what it came down to. The  
7 National Highway Traffic Safety Administration  
8 has an activity known as, I can't remember what  
9 it's called, it has to do with, with product  
10 failures and they have a web page that people  
11 can go into, you know, the US Government website  
12 and put in a complaint, put in a report.  
13 Q. Right.  
14 A. And so, it turned out that since the Internet  
15 has become so popular people have actually begun  
16 reporting incidences with their vehicles to the  
17 National Highway Traffic Safety Administration  
18 quite regularly and probably it, I almost got  
19 the feeling their doing, their sending more  
20 reports on NHTSA than they are to, to us the  
21 manufacturers. In this particular case we had  
22 had a phone call from a fire Marshall who said  
23 we think you've got a problem and didn't tell us  
24 anything more than that and --  
25 Q. So you --

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1 A. The National Highway Traffic Safety  
2 Administration was, was receiving, you know, a  
3 report here and a report there. And then about,  
4 well it wasn't about, it was November of 1998 --  
5 Duh-huh.  
6 A. The National Highway Traffic Safety  
7 Administration determined that there had been  
8 enough inquiries to them about '92 and '93 town  
9 cars that they opened an investigation which was  
10 their, their standard procedure in that case.  
11 Q. You, you're an employee of Ford, is that  
12 correct?  
13 A. Yes, sir.  
14 Q. How much do you make every year?  
15 A. Just, you mean my salary or my benefits --  
16 Q. Salary.  
17 A. I think my salary is around ninety-seven  
18 thousand dollars a year.  
19 Q. Okay.  
20 A. You have to ask my accountant wife.  
21 Q. You also have a pension there, you've been there  
22 for over twenty years.  
23 A. Yes.  
24 Q. Now, are you saying to us that Ford first became  
25 aware of this because a fire Marshall contacted

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1 you had said you might of had a problem?  
2 A. He actually became aware of it after we saw  
3 the data that the National Highway Traffic  
4 Safety Administration had. The only other  
5 indication we had was one single phone call. The  
6 point I was trying to make that, that we would  
7 get a phone call here and a phone call there and  
8 there was never a pattern that anyone could see  
9 because there weren't enough, there weren't  
10 enough calls, there wasn't enough data.  
11 Q. What time frame is that?  
12 A. This was from about January or February of 1988  
13 until, until KHS&A contacted us in November.  
14 Q. Okay. So, the next engine manufactured in 1988,  
15 is that correct?  
16 A. Yes, sir.  
17 Q. And from 1988 to 1989, Ford did not receive any  
18 complaints about engine fires in these  
19 vehicles?  
20 A. No.  
21 Q. Is there an explanation for that?  
22 A. As far as what I've been able to learn from the  
23 recall team within Ford, yes, there is an answer  
24 to that.  
25 Q. What is that?

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1 A. The parts that are in question or, as I said  
2 earlier, a small group of parts that were built  
3 at a certain time frame, on a certain piece of  
4 equipment and those parts when tested at that  
5 time were, were all right --  
6 Q. Oh-huh.  
7 A. -- and they worked correctly. Part of the, the  
8 cause of these fires and part of difficulty in  
9 finding this out was that the part had to be on  
10 a vehicle line, the team found about sixty to  
11 eighty thousand miles for, for an average, and  
12 five or six years in service to be replaced also.  
13 One of the other patterns we've noticed is that  
14 they occur predominantly to vehicles that have  
15 lived most of their life in a very hot humid  
16 climate --  
17 Q. Okay.  
18 A. -- and --  
19 Q. This particular vehicle that's involved in this  
20 lawsuit, would you agree with me, that that  
21 description, and let me ask you specifically, it  
22 had the approximate number of miles that the  
23 defect began to appear, would you agree with  
24 that?  
25 A. It was slightly early in, in the recall pattern

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1 but I'm not sure exactly where the pattern would  
2 map, you know --  
3 Q. Okay.  
4 A. -- it's a little bit early but not, not out of  
5 the question early.  
6 Q. Would you agree with me that it fits the  
7 description that it lived primarily in a hot  
8 climate?  
9 A. Yes.  
10 Q. And as far as the origin of the fire was  
11 concerned, would you agree with me that the fire  
12 appeared in the area where this defective part  
13 was? Mainly the left rear engine compartment.  
14 A. Yes. Matter of fact, looking at Mr. Johnson's  
15 deposition and Mr. Kennedy's report except for  
16 the fact that I have some, some knowledge of, of  
17 internal Ford information, I agree with just  
18 about everything they concluded in their reports  
19 -- everything says that this, this incident  
20 showed quite a few similarities to an incident  
21 involving one of the small part's. Absolutely.  
22 Q. When did Ford first install these defective  
23 parts in any vehicle?  
24 A. MR. STANIS I object to the form of the  
25 question.

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1 A. That's one of the dilemma's we have had in  
2 actually establishing how many vehicles to  
3 recall. And that's why the span is so, so  
4 large, they thought that, to the best of their  
5 knowledge they thought that the vehicles began  
6 getting this part in mid to late December of  
7 '81, and that they stopped somewhere in February  
8 or March of 1982, it was about a three month  
9 kind of a time frame --  
10 Q. Right.  
11 A. -- but because they weren't certain exactly, you  
12 know, where the part's went, that there were  
13 three different vehicle lines, two different  
14 plants, some went directly to the plant's, some  
15 went directly to a, an intermediate supplier.  
16 Q. Okay.  
17 A. And so, they couldn't identify precisely where,  
18 you know, the, the time frame. So what they did  
19 was they, they expanded the width of the recall,  
20 basically. Instead of recalling this, you know,  
21 sixty thousand and, vehicle production in this  
22 three month period, to ensure that they got all  
23 of them, they went out another three months  
24 before that and six months after that.  
25 Q. Okay. What were the two plants again?

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1 A. The town car was built at the Lincoln, Michigan  
2 Assembly Plant at that time. And the Crown  
3 Victoria and the Grand Marquis were built at St.  
4 Thomas, Ontario Assembly Plant --  
5 Q. Okay.  
6 A. -- and now I believe all three of those vehicles  
7 are built at St. Thomas.  
8 Q. Would you agree with me that we, again we find  
9 another similarity this particular vehicle was  
10 built at this Lincoln plant?  
11 A. Well, at that time the only, all '92 town cars  
12 were built at Lincoln.  
13 Q. Okay. So all the 1992 town cars were built at  
14 Lincoln, how many town cars were built there?  
15 A. I would have to check the records. As I recall  
16 I think the town car was about a ninety thousand  
17 a year volume, back in that time period. Right?  
18 or ninety thousand a year.  
19 B. When did you start to produce at this plant,  
20 this is where all the town cars were produced,  
21 when did you start to produce Lincoln Town cars,  
22 what date?  
23 A. The actually Lincoln Town car (trans?)  
24 B. Yeah.  
25 A. Car line?

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1 Q. So, on, the 1992.  
2 A. Oh, '92 model year, okay. The beginning of that  
3 model year started somewhere in the July of  
4 August time frame. I'd have to go back and check  
5 to be sure I don't know what, we call it job  
6 one, basically.  
7 Q. Okay. So you began to manufacture at this one  
8 plant and this is the only place you  
9 manufactured in July or August of 1991, and when  
10 did you stop?  
11 A. The '92 model year --  
12 Q. Uh-huh.  
13 A. -- would of stopped when the '93 model year  
14 started in the summer of 1992, you know, the  
15 January or, I'm sorry, July or August time frame  
16 of calendar year '92. Basically the model years  
17 are six months before the calendar year if, if  
18 you want to think about it that way.  
19 Q. All right. Help me with this, do all the  
20 Lincoln Town cars come down the same line, or  
21 are there different lines of manufacture, what  
22 I'm saying are you just manufacturing one at a  
23 time or do you manufacture multiple at a time?  
24 A. Well, it's a, it's a continuous flowing assembly  
25 line, so it's, it's hard to say that. The line

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1 is, is full, from beginning to end. There will  
2 be, you know, bodies in the paint shop, there  
3 will be bodies going together in the stamping  
4 shop behind that. There will be instrument  
5 panel and interiors of seats going together in  
6 the trim areas and then those things all come  
7 together with the chassis and the power terrain  
8 on the final line. And all of these locations  
9 are, are full of parts and it's continuously  
10 moving.  
11 Q. Okay. So there's only vehicles at a time moving  
12 through this assembly line is that correct? I  
13 don't mean one at a time, but they all go down  
14 the same line --  
15 A. Right. Now to tell. The line at Lincoln is a  
16 rather unique assembly plant because they build  
17 three different vehicles there in that, in that  
18 time frame, the Lincoln Continental, the Lincoln  
19 Mark 4 and the town car, Lincoln Town Car were  
20 all built on the same, in the same facility.  
21 And, I do believe they went down the same line  
22 or one of them went down that same assembly  
23 line. So you might have twenty town cars and  
24 then you might have twenty Mark 4's, you know,  
25 behind --

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1 Q. Okay. What is the term VIN under mean? VIN  
2 under?  
3 A. Well, VIN, V-I-N stands for vehicle  
4 identification number --  
5 Q. Uh-huh.  
6 A. It's just an acronym for that, that term. The  
7 VIN codes, I'm not exactly sure what that means.  
8 I'm assuming it has to do with the sequence  
9 number the last six digits --  
10 Q. Okay.  
11 A. -- are a sequence number and those sequence  
12 numbers are allotted by some system that I have  
13 no knowledge of. But, I don't believe they  
14 chronological, I believe they, they have used to  
15 do with the plant and the product that's being  
16 built at that plant. They allocate a block of  
17 number's to them for a certain period of time  
18 and then when they use them up they're allocated  
19 another set --  
20 Q. Uh-huh.  
21 A. -- to try and keep the number's reason, so that  
22 they are unique identifiers in the vehicle.  
23 Q. Let's go and take a look at this VIN number on  
24 this particular case, can you get that for me,  
25 please?

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1 A. Okay.  
2 Q. And you can look at your report. Exhibit E.  
3 A. Exhibit Number 2?  
4 Q. Right.  
5 A. Yes, sir.  
6 Q. All right. The VIN number is disclosed there,  
7 right?  
8 A. Yes, sir.  
9 Q. And can you just tell me what that VIN number  
10 is, please.  
11 A. L1N1N1N1N1N1N1N1.  
12 Q. All right. And, let's, let's go through that,  
13 what, what is that number tell you?  
14 A. Okay. Again with, with possibly a little error  
15 on a digit or two here, I'd, the first three  
16 digits, tell me this is a Lincoln Mercury  
17 product --  
18 Q. Okay.  
19 A. -- I believe the 6 tell's me that it's a town  
20 car --  
21 Q. Right.  
22 A. -- the next four have to do with describing the  
23 brake system, the fact that it has a hydraulic  
24 brake lock system with ABS --  
25 Q. Right.

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1 A. -- the fact that it has a 4.0, 4.0 liter V6  
2 engine and that it has passive seat belts and  
3 driver side air bag, I think is what those  
4 number's identify. The sheet that you asked me  
5 to get you out of my shop manual, earlier on,  
6 we'll get me a break down, it'll show you  
7 exactly how to decode that number.  
8 Q. What number tells you when that car was  
9 manufactured?  
10 A. None of the number's in the VIN tell you  
11 precisely when it was built --  
12 Q. Uh-huh.  
13 A. -- the build date of the vehicle is recorded  
14 with the VIN when the vehicle was actually  
15 produced and taken off the end of the assembly  
16 line. But, the date itself is not buried in  
17 that number at all.  
18 Q. When Ford went to the, to the National Highway  
19 Traffic Safety Administration, and said because  
20 these vehicles are not produced in VIN order,  
21 what were you saying, what was Ford telling the  
22 National Highway Traffic Safety Administration?  
23 A. Well, I think it's something that, that the  
24 National Highway Traffic Safety Administration  
25 knows, the last six digits we keep track of the

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1 number and the build date, we know, we know what  
2 it is but, these number's are not sequential and  
3 after the other numbers it would be far to easy  
4 for people to fake a VIN number if they knew  
5 what those number's were. So those number's are  
6 actually random, the last six numbers, that's  
7 why we have to keep track of them.  
8 Q. Who is, who assigns them?  
9 A. You know, I really don't know what that process  
10 is.  
11 Q. Well, Ford is the one --  
12 A. Oh, I'm sorry. Yeah, Ford does, I mean within  
13 Ford Motor Company I'm not sure how we go about  
14 doing that. I know that the number's first two  
15 to five hundred and ninety-nine thousand nine  
16 hundred ninety-nine are given over to Ford  
17 division products and that the number's six  
18 hundred thousand through nine hundred and  
19 ninety-nine thousand nine hundred ninety-nine  
20 are given over to Lincoln Mercury products but,  
21 that's all I know about how those number's are --  
22 Q. So is it your testimony that Ford does not use  
23 any type of random system as far as assigning  
24 these last number's like the lowest number's to  
25

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1 the earliest manufactured vehicles and highest  
2 number's to the latest?  
3 A. No. I'm saying I don't know what the system is.  
4 Q. Uh-huh.  
5 A. I do know that they are attempting to be random  
6 with it, to try and better the misuse of VIN's  
7 in either car thefts or in rebuilding, you know,  
8 of cheap vehicles and reselling them as, as  
9 something different than they really are. And  
10 I'm just not familiar with the process I do know  
11 that when we establish a VIN for a vehicle as  
12 it's going down the assembly line we record the  
13 date that vehicle goes off the line with that  
14 VIN and we never forget it, I think. I'm not  
15 exactly sure how long we hold on to that but, I  
16 think it's forever.  
17 Q. This goes into that computer system, is that  
18 right?  
19 A. Yes, sir.  
20 Q. Okay. Let's go back to the assembly line. Now,  
21 apparently you changed from a vacuum system to  
22 some type of electrical system is that correct?  
23 A. Yes, sir.  
24 Q. When did you do that?  
25 A. This was the first vehicle, one of the first

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1 vehicle that received that new system, it was  
2 done in the 1982 model year.  
3 Q. So, this is -- your saying that this, this  
4 vehicle has the old vacuum system in it.  
5 A. Oh, I'm sorry. I didn't mean this specific  
6 vehicle I mean this car. In 1982 we switched  
7 over from a vacuum actuated speed control to an  
8 electrically actuated speed control on the town  
9 car, Crown Victoria, Grand Marquis and then  
10 slightly later than that in the model year, like  
11 I think February or January time frame we also  
12 made that change over in the Fordoline Van. And,  
13 subsequently it was after that we began to make  
14 the same change to all our other vehicle lines.  
15 Q. So in 1982 you changed on this assembly those  
16 Lincoln Town cars at one end, from the vacuum  
17 system to an electric system?  
18 A. Yeah.  
19 Q. Okay. Now, obviously the employees that were  
20 working along that vacuum line were aware that  
21 this change was taking place and they had to do  
22 that, is that right?  
23 A. Yes, sir.  
24 Q. And obviously when the floor men and the  
25 supervisor, when all that old vacuum stuff was

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1 carried out, right?  
2 A. Um-huh.  
3 Q. And all the new electrical stuff was carried in  
4 Ford mode instead of that, right?  
5 A. As far as the specific day, I'm sure that the  
6 plant kept records, you know to that level of  
7 detail, yeah.  
8 Q. Now what is that date?  
9 A. I don't know that date.  
10 Q. Wouldn't that be important to you to determine  
11 whether or not this --  
12 A. The issue at hand is, is how long do we maintain  
13 the records of when those specific parts are out  
14 of inventory --  
15 Q. Okay --  
16 A. I believe the records have, are they just don't  
17 exist anymore because they're too old. They're  
18 eight years old. Nine, well, some of them would  
19 be nine years old by now. And I just think that  
20 they, they've been discarded because they're  
21 old.  
22 Q. And were they discarded back in 1988?  
23 A. I don't know. We'd have to go and talk to  
24 someone who is involved in the supply line the  
25 production control people who bring the parts to

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1 the assembly line and know what they're record  
2 retention policy is on, on inventory.  
3 Q. Why wasn't Ford able to go to the National  
4 Highway Traffic Safety Administration and say  
5 generic non (Inaudible) cars manufactured at this  
6 date?  
7 A. I don't know.  
8 Q. Does anybody know?  
9 A. I don't know.  
10 Q. Does the National Highway Traffic Safety  
11 Administration know?  
12 A. I don't believe so. I assume that the records  
13 had been destroyed and that's why we couldn't be  
14 anymore specific as to the very day and date  
15 that it occurred on the line.  
16 Q. You agree with me when I say, in reality when  
17 you set up the product recall beginning date and  
18 ending date, that that was an estimate. But, in  
19 your opinion a safe estimate, is that right?  
20 A. Well, the original date's were a much smaller  
21 stand of time that the team was working with and  
22 it was expanded beyond that because we felt we  
23 didn't have good enough information to narrow it  
24 down that, that small.  
25 Q. Okay.

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1 A. We will always attempt, we will always choose to  
2 err on the side of recalling more vehicles.  
3 Q. But, when you set those dates, you didn't have  
4 any information as to when you began the, the  
5 electric device in the valve device.  
6 A. When you asked me the question earlier I said I  
7 don't know, Okay. If -- they may have known  
8 when they wrote that letter and they dated  
9 November 4th --  
10 Q. But, your speculation --  
11 A. -- we calculate on that.  
12 Q. Am I right?  
13 A. No. I'm just saying that I don't know --  
14 Q. All right.  
15 A. -- personally.  
16 Q. So, they dated this date November the 4th, is  
17 that correct?  
18 A. According to Exhibit Number 3, it says that  
19 certain town cars built at the Windsor assembly  
20 plant from November 4th, 1981 through November  
21 the 30th, 1982.  
22 Q. All right. And, this is approximately two weeks  
23 after the alleged production date of this  
24 particular car, is that correct?  
25 A. Yes, sir.

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Q. And are you able to say under oath that there are no Lincoln Town cars produced prior to November the 1st that have this electric system in it?

A. Yes, sir.

Q. Okay. Even though you don't know when they changed?

A. I don't -- I personally do not have the specific data but there are two things that are rather compelling to me and why I make the statement the way I did. One is the fact that the people who wrote this letter may very well have known exactly what happened and had the document's that I don't have at my disposal, and that's why they picked November 1st, okay. And, the other thing on this that's, that's really compelling to me, as I said earlier is in attachment number 2, where we actually had to write a supplement to the original recall letter to be able to cover our dealers who are opening up some of these loans and finding that the old system was still on those vehicles.

So we knew we had picked a date far enough forward that we were actually getting into the old system. So, I felt, I feel very, very

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comfortable under oath or otherwise stating that I think we absolutely got every car the vehicles from the beginning of production of the electric speed control into the recall population, and that none of the vehicles built before that date would of have it on them. The point is if the vehicle was built after November 1st and is in the recall population, then the electric system wouldn't have been used, I guess is what I'm basing my statement on.

Q. I see. Have you ever seen one of these fires when in fact it's electrical system, let me ask you this in another way. That electrical system, the thing that -- can you bring out that device?

A. The part?

Q. Yeah.

A. Sure.

Q. And, if you could, could you remove the part.

Okay. And, could you hold that up, and is that the part that is defective?

MR. STARR: Object to the form.

A. This is the part that is the subject of recall 89-4-13.

Q. Okay. What's wrong with it?

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A. This particular part I have in my hand absolutely nothing's wrong with this one because it was built in 1987.

Q. Okay. What was wrong with the one's that were, that were subject of the recall?

A. Okay. A, a small portion of production, the best of our ability to recreate the situation back in 1984, a small lot of production parts got into, into the line that had some difficulty in one of the manufacturing operations that stripped some of internal parts together. Okay.

Q. M-hm.

A. And, at the time they were manufactured they looked fine, they functioned fine, they fit fine; everything was, was absolutely glorious in every way. But, the part was, the clip had actually caused the part to be stressed in, a seal to be stressed in a way that caused it not to live quite as long as we would like to see it live.

Q. And they caught fire?

A. The seal would fail. It would stop sealing brake fluid in this half of the switch from the electrical contacts in this half of the switch and brake fluid, especially in a hot environment

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like this is, and over a long period of time like these parts were on the vehicles would start to corrode the contacts, and the contact is actually connected to the point where it comes apart and it falls down against the base of the switch.

And since the base of the switch is mounted to chassis of the vehicle, the base of the switch is ground to the electrical system. And, when that switch contacted anymore is corroded enough and if it's gotten a leak of brake fluid, which is a small percentage, if a number that has gotten to the contact and it sat there long enough in time and it has been cycled through enough hot temperatures, that piece of electrical contact could fall and fall apart and if it happens to fall down inside the switch exactly to, to create a circuit between the power side of the switch in the base of the switch it will actually begin to heat up from that short circuit and start, start the plastic pieces on fire.

Q. So, it catches fire?

A. Possibly, yes.

Q. Okay. How many of these switches based upon

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1 Ford's records, have caught fire?  
2 A. How many of the vehicles have caught fire?  
3 Q. Yes, sir.  
4 A. I don't know.  
5 Q. Is it over ten thousand?  
6 A. No. Not to the best of my knowledge of  
7 information that I've seen but, I may not have  
8 seen it all. I, no I, I'm not sure how to  
9 honestly answer your question.  
10 Q. Do you, do you report to the National Highway  
11 Traffic Safety Administration the number of  
12 vehicles that have caught fire?  
13 A. I don't believe I've seen a report in that  
14 nature, we, we report to them how many of the  
15 vehicles have been recalled, to start with --  
16 Q. Right.  
17 A. -- and then every quarter after that, very sparse  
18 months, we're required to send them a report and  
19 tell them how many of those vehicles have been  
20 serviced for that recall.  
21 Q. Okay. So, you don't report to the National  
22 Highway Traffic Safety Administration incident's  
23 of that vehicle catching fire?  
24 A. I think during the investigation, we traded  
25 information back and forth with the National

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1 Highway Traffic Safety Administration but I  
2 don't believe that they have a requirement for  
3 us to report all the incident's that are  
4 reported to us. I don't know. I really don't  
5 know to be honest with you.  
6 Q. I understand, yes. When Ford makes a decision  
7 to recall, is there a certain number of  
8 incidents that have to take place before you do  
9 that?  
10 A. Not to my knowledge that there is some magic  
11 number, so to speak. I think it has a lot to do  
12 with the evidence at hand and how accurate and  
13 compelling that evidence might be. In this  
14 particular case when the National Highway  
15 Traffic Safety Administration began their  
16 investigation and basically contacted us about  
17 that. At the time, their notice to us said that  
18 there seemed to be problem in this area of the  
19 engine compartment and when we first looked at  
20 it, we thought it could be this part, this part,  
21 this part, that part, they had a list of,  
22 I think it was four or five different name's.  
23 So, because the information that that both they  
24 and we were receiving at the time, because it  
25 was this strongly as to, you know, how detailed

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1 it was. We really didn't know what was, what  
2 was going on that's why --  
3 Q. You don't say information available to you that,  
4 at Ford that tells you how many of those devices  
5 that caught fire?  
6 A. I have a lot of pieces of information, but I, it  
7 doesn't answer the question the way you proposed  
8 it.  
9 Q. Who manufactured that piece?  
10 A. Those parts were manufactured for us by Tumes  
11 Instruments.  
12 Q. How many claims has Ford made against Tumes  
13 Instruments with that damage to that part?  
14 A. I don't know.  
15 Q. Is it more than a hundred?  
16 A. I, I don't know, as I said I can tell you --  
17 Q. That must be a bill --  
18 A. -- I can tell you number's of lawsuits and  
19 claims roughly but I don't have the latest  
20 information --  
21 Q. Tell us --  
22 A. -- I can tell you the number of cases that I  
23 know of.  
24 Q. Tell me number of claims, roughly.  
25 A. The last time I think I reviewed them for, for a

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1 deposition there was something on the order of  
2 two hundred to three hundred, if you don't mind  
3 me giving you a range. You hundred to three  
4 hundred incidences that had been reported to us  
5 that we were investigating.  
6 Q. Okay.  
7 A. Some of those were lawsuits some of those were  
8 insurance claims some of those were personal  
9 accidents that we got from witnesses or dealers.  
10 Q. Do you know how many subrogation claims that  
11 have been filed against Ford on this particular  
12 device?  
13 A. So. The list that I have seen though do include  
14 those.  
15 Q. Companies supplied us with a pretty large stack  
16 of claims here and I noticed there's no claims  
17 by insurance companies, no subrogation claims.  
18 Do you have a explanation for that?  
19 A. I know that this particular case that we're  
20 talking about today, I know it as John Partner's  
21 but I understand that it was actually formally  
22 filed depositor's insurance. You know, so, I  
23 think is a lot of our record keeping, just to  
24 keep things a little more specifically  
25 identified I think we tend to use the the

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1 owner's seat, because it's more unique than the  
2 Lawrence's suspension.  
3 Q. That switch, how many fire's have you examined  
4 that involved that switch?  
5 A. As I said earlier about twenty to twenty-five  
6 vehicle fires that I've investigated, our  
7 vehicles that have this switch on it.  
8 Q. Now, the switch itself that's plastic, is that  
9 correct?  
10 A. The switch, the electrical half, like I like to  
11 refer to the electrical half of this switch is  
12 plastic yes, it has to be to isolate the  
13 contacts.  
14 Q. And the other part and on I suggest is aluminum?  
15 A. The retaining ring is aluminum, I believe the  
16 pressure part is actually steel, if I'm not  
17 mistaken, I can go back and double check the  
18 drawings.  
19 Q. And, that pressure part it's, it actually snaps  
20 into that other device, is that correct?  
21 A. Yes. It goes right into this port --  
22 Q. Will you agree that is the way it would appear,  
23 please?  
24 A. Okay.  
25 Q. The plastic melts in the fire, is that correct?

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1 A. Yes, sir.  
2 Q. And what happens to aluminum in fire?  
3 A. It will also eventually melt --  
4 Q. Okay.  
5 A. -- and burn.  
6 Q. And when aluminum melts and burns what's the  
7 color of the residue that it leaves?  
8 A. Typically white.  
9 Q. Okay. Now you looked at this photograph,  
10 correct? And in that photograph, could you hold  
11 up that device there?  
12 A. Oh-huh.  
13 Q. And, if I can see my pen, there's, there's this  
14 one side on this side, right?  
15 A. Right.  
16 Q. And this is up on this side, is that correct?  
17 A. Yes, sir.  
18 Q. And would you tell us where you saw the white  
19 substance?  
20 A. You saw from the photograph --  
21 Q. No. On the -- would you point to where you saw  
22 the white substance in the photograph?  
23 A. Well, the, the --  
24 Q. No, could you look at that device and point to  
25 where you see a white substance on that device.

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1 say that's the device that's in that --  
2 A. Well, it wasn't a substance that I saw. It was  
3 the part itself. It was, it was this surface --  
4 Q. Okay.  
5 A. -- of one of these valve bodies without that  
6 hole drilled and tapped into it. This feature,  
7 this hole isn't in that part in that picture.  
8 It's actually another one of these --  
9 Q. Where did you see the white substance?  
10 A. It wasn't a substance it was this square surface  
11 right here on, in that picture without this hole  
12 drilled in it. Okay, that's what I saw on the  
13 picture --  
14 Q. So, you're, you're saying, what happened to the  
15 white substance, you're saying that white?  
16 A. No, I didn't. I guess, I don't recall ever  
17 using the term white substance. I said that the  
18 white spot on the picture that's square in shape  
19 that's underneath the brake booster in the  
20 photograph is that surface of this, this valve.  
21 Q. That, which I see in front of me, is not white,  
22 agreed?  
23 A. This is plastic, yeah. So it's, the plastic is  
24 still as is, so it's also and wet, also and  
25 shiny.

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1 Q. And, what, what part of that device were you  
2 actually able to see in this photograph?  
3 A. I believe that that photograph clearly depicts  
4 much that much of that valve.  
5 Q. Okay. In fact, the right hand side of that  
6 valve, you cannot see? So --  
7 A. If you're looking at it, this, this, you're saying  
8 this is the right hand side, yeah, this is the  
9 driver's side.  
10 Q. If I, if I could take this piece of paper, put  
11 it there, essentially you're saying that when  
12 you look at that photograph, you're able to see  
13 this part over here, is that right?  
14 A. Essentially.  
15 Q. And on that part over there you say that it's  
16 white or had a white substance on it, so I  
17 suggest about that?  
18 A. MR. STARR: Object the form of that  
19 question.  
20 A. I believe I said that it was white because the  
21 photograph's flash it flashed off that surface.  
22 Having not investigated the vehicle myself, I  
23 can't guarantee you what actual color it is,  
24 photographs are not always perfectly accurate.  
25 The fact that it is brighter in color than, than

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everything around it and the fact that I am one square degree and angles and I'll be honest with you, I, I needed a magnifying glass to see this as clearly as, as my recollection would, okay? That is very definitely -- the other thing too, keep in mind. I've seen twenty or thirty of these vehicles, I've taken that picture myself twenty or thirty times along with a half a dozen pictures, getting closer, closer and closer to this proportioning belt, and as I've got what I consider an awful lot of experience looking at that view.

Q. I understand.

A. -- And, as I said, I'm very convinced that what I am looking at is basically, you know, that part, that piece of that part down in there, and whether this is -- I assume your questions are alluding to the fact that is that melted aluminum or not? I don't know what caused that to look like in that photograph --

Q. Uh-huh. But what's the explanation, would you agree?

A. -- No, I'm not --

Q. You wouldn't?

A. -- I'm sorry, let me rephrase that, I would

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agree that that's a possible theory, but I would be very skeptical about going very far with that theory because this is a limited copy of a photograph, that was taken from a distance that, in my opinion, is not appropriate to be drawing these kinds of conclusions. That's why I was trying to describe it more by its relative appearance of color and shape, not by saying I think it's a Ford proportioning valve using the part number, you know that, I was trying to describe what I saw in the picture.

Q. Do you have the same resistance in testifying that that part in the left does not have a hole in it?

MR. STARK: Object to the fact.

Q. Or is it possible there is a hole there, even if it is covered up by the aluminum residue?

A. I'm sorry to hear that again sir --

Q. Well, you're saying --

A. You talking about this, this piece?

Q. You and I seem to agree that essentially we have what might be a dog's breakfast on a burnt piece of meat here and we're trying to draw conclusions from this as to what you're looking at, right? But do you feel safely confident

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looking at that, that small piece, it looks like less than a quarter of an inch, to all that and saying, no, there's no hole drilled in that?

A. That's right. I --

Q. That is --

A. -- I have twenty --

Q. -- a whole substance is aluminum, that's covering that?

MR. STARK: I want to put one objection on the record and ask that Mr. D'Brice allow the witness to finish answering --

Q. I'm sorry.

MR. STARK: -- one question before starting another question.

A. The fact that the shape is square in this photograph, and the fact that you can see it, it's bright, so it's telling you there's metal there or something that's bright, but the fact that it's square is telling me that it isn't possibly have one of those in there, because the base of this switch is in every one of the vehicles that I have seen, that I know that vehicle has this switch in it.

What you would see in that picture is something that looks very round. You would see a

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very round shape of the piece underneath this or this piece itself may have survived the fire, okay. And the inside where all the plastic residue from this piece is, would be dark, so you'd see almost like a bull's eye, you'd see a bright circle and you'd see a black center to that circle. But this part of the, this part of the switch is made of steel, so it's never consumed in a fire.

Factor of fact if it were consumed in a fire, this piece would be consumed long before because this piece is made of aluminum, so this would have fallen off and disappeared. So, I, I again I'm fairly comfortable in saying I think, I've seen enough of these to know that they would be round and not, it would be a round object in there, not a square object. If the switch were in that vehicle at all.

Q. I've taken down of those complaints, and the last four, the last six digits of Doctor and Mrs. Richard age 418841. Now, would that number be assigned to one of the -- that would be an early manufactured vehicle in 1991, '92?

A. That number does not tell you that. That number has no chronological date in it.

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Q. So there could be a vehicle or, or a runkey chase that's 18,131 side by side those two, two people's manifestation?

A. To the best of my knowledge, yes, that's true, again, I'm not even of the specific way they sequence those numbers, but I do know that they are sequenced in a random fashion. So there is no chronological information in that number. Runkey 00000 was not the bumper in front of, the front bumper of this vehicle and 00000 was not the blue Lincoln behind this Lincoln, you know as the assembly line, there's, there's no logic.

Q. I'm curious how that's done, if you have each vehicle, it's coming down the assembly line, who's giving those numbers out or when does this VIN label go on the vehicle?

A. As I said, I'm not certain of the process as I can't answer you on this one, I know that there is --

Q. Well, isn't that important?

A. -- There are two VIN plates on the vehicle that I am aware of, one is on the hood top, right underneath the windshield, so it would have to go on before the windshield goes on, although

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the windshield goes on very, very late in the process, it's one of the last things that we do, and the other thing that has the VIN on it is the engine sticker. Which has to be put on the driver's door, the end of the driver's door, and that is done at the end of the line also, after it's passed vehicle line test, so those parts are added to the vehicle very late.

Q. Well, there must be someone at Ford that assigns the, these last numbers of the VIN?

A. I'm sure there's a process, actually to do this, I just, I'm not aware of it, I don't know what the process is.

Q. So you think that the previous night, that's, that would be six hundred and forty thousand, they might go to six hundred and forty thousand and nine hundred thousand and just kind of randomly assign numbers?

A. Well, you had asked me earlier to get you a copy of the VIN book break down one of our service manuals. And the only thing that the service manual says is that the numbers up to five hundred thousand are for Ford division products and the numbers from five hundred thousand and up are from Lincoln Mercury products and they

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have to go, they have to give them to different plants, because those products are built in multiple plants --

Q. Okay.

A. -- and they are trying to keep things random, so that the numbers can't be easily copied, copied or counterfeited. But again, I just, I don't know what that particular process is, beyond the fact that I know the first five hundred thousand are for Ford and the second five hundred thousand are for --

MR. O'BRIEN: Let's have this one marked, we got to place it.

MR. STARR: This is the Plaintiff's.

(COMPLAINT MARKED AS PLAINTIFF'S EXHIBIT NUMBER 1 FOR IDENTIFICATION.)

A. What are we up to, I hear?

MR. STARR: This is the Plaintiff's.

A. Oh, I'm sorry.

MR. STARR: This is Plaintiff's, anyway. So it starts at 1.

A. So it gets a different sticker.

Q. I've just selected a few of these complaints and could you tell me what the VIN number of these complaints are?

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A. The VIN number on this is 1F2HQ9W77G71001.

Q. Okay, so what do we know by looking at that?

A. I know that is a 1992 Ford car with a 1.6 liter engine, an automatic transmission, and if I read on further, doesn't give you any of the other information. So the first thing I would want to do is run this and find out what the bill date was on this vehicle, because I know that that VIN doesn't tell me what the bill date is.

Q. And what are the last six numbers?

A. 072000.

Q. And the numbers in the row 000001, and what's the name of the person that file the complaint?

A. The name on this is, Mark, let's see first name, I'm sorry, trying to figure out how this form works, Mr. Mark Gordon.

Q. All right. What was the complaint?

A. Customer says, the vehicle caught on fire after sitting for an hour. The fire department said this was due to an electrical fire, is what the customer said.

Q. Okay. All right. What did Ford do as a result of that complaint?

MR. STARR: Object to these questions on relevancy. You can go ahead.

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A. Okay. The way the Ford works is the, the, Ford customer service people also include any comments from the dealer, in this particular case they had no contact with the dealer. The customer seems from Ford, Ford credit said to mail the engine -- the customer assistance center for any recalls on the vehicle and then the customer assistance center advised, there are currently no recalls for your vehicle. This is based on a October 14, 1987 conversation, as at the time there were no vehicle recalls.

Q. Okay. Now, was that a complaint that Ford received?

A. This is in the Foster Power relations systems database, this is Ford's data, yes, this was received by Ford.

Q. Okay. So apparently Ford did receive complaints before this fire Marshall order?

A. This is pretty close to the same time frame when there, when that phone conversation with the fire Marshall occurs, like right around the end of '87 and '88.

Q. Okay.

MR. O'BRIEN: Mark this for me, please.

(COMPLAINT NUMBER RE PLAINIFF'S EXHIBIT)

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REMARKS: I FOR INFORMATION.)

MR. SWARTZ: I'm continuing objections to all of these questions, until the topic changes. On relevance.

Q. What's the VIN number there?

A. The VIN on this one is 1LN6H2W17081.

Q. What car -- what do we learn from that VIN number?

A. Ah, we have a 1988 Lincoln Town car with a 4 -- I know saying four six and four eight, not making up my mind on it I believe it's a 4.1 liter, V8 engine, 4.1 liter, I'm sorry, let me check my data, and V8 transmission.

Q. So where did that fire take place? In what part of the car?

A. Customer says, was parked in garage, smelled smoke in the house, looked out car was on fire, there was a big hole in the hood. Battery was on top of car, appears hood was melted, blew motor apart.

Q. On that particular point, do you agree with all these reports and the photographs on those Lincoln Mercury that the hood is non-existent?

A. The hood is consumed in the fire in that case.

Q. And what is --

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A. -- by the appearance of those pictures, yes.

Q. -- and what is the hood made from?

A. The hood is aluminum.

Q. Okay, and when that aluminum burns away, where does the substance of that hood go?

A. To the best of my knowledge the hood basically becomes vapor and dust and it's blown away.

Q. Does it fall down in the engine as well?

A. Depends on how hot and how fast the fire progresses. Sometimes you will find, you will find melted aluminum pooled underneath the vehicle or on each of the lower components. And sometimes you won't, sometimes it's just, it's, you know, basically evaporated.

Q. Is that particular complaint they were looking for, what did Ford do as result of that complaint?

MR. O'BRIEN: I have a further objection to all of these questions on the grounds that this is hearsay.

MR. O'BRIEN: Okay.

A. In this case of the Ford customer assistance center advised the customer to contact their insurance company.

Q. Why, do you know?

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A. That is what our customer service representatives are told to do in cases where there is no known, you know, information or reason for this occurrence, but the first person that the customer is recommended to go to on older vehicles is their insurance company.

Q. Okay. And was that an engine fire?

A. From the information here I can't really say for sure, there's, there's actually parts that have been covered and says the battery's on top of the car, blew apart again, so I'm not sure what all that means and this is subjective description so --

Q. Sure, and this happened after the vehicle was parked, is that right?

A. Again it doesn't give specific data on time, it says it was parked in the garage.

Q. Okay. And apparently it caught fire, is that correct?

A. Car was on fire, based on the way this is --

Q. And what was the date?

A. -- recorded yes.

Q. What was the date of that complaint?

A. The date was February 27, 1988.

Q. Is that after or before the recall?

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1 A. That is before the recall.  
2 Q. You mean the date --  
3 A. Right.  
4 Q. The date of the phone call?  
5 A. Yes.  
6 Q. Now there's another complaint that was received  
7 by Ford before the recall, is that correct?  
8 (COMPLAINT MARKED AS PLAINTIFF'S EXHIBIT  
9 NUMBER 3 FOR IDENTIFICATION.)  
10 A. Yes.  
11 Q. I'll just have a few more of these.  
12 A. This is a phone call that we received.  
13 Q. I understand.  
14 MR. STARR: Again I have continuing  
15 objection, as he looks at any of these documents  
16 on grounds of relevancy, hearsay.  
17 Q. What's the name of the next person that  
18 complains in this particular one.  
19 A. Mr. Richard Knight, Knight.  
20 Q. And what does the vin number tell you about that  
21 complaint?  
22 A. It's a 1981 Town car, same engine and  
23 transmission as the others you've shown me,  
24 again I'd have to go back to the service manual  
25 to make sure what the difference between an L1

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1 and an S, 2 is, but I think it has to do with  
2 the, the particular.  
3 Q. Okay, and what's the last six numbers in that?  
4 A. 664182.  
5 Q. Okay, where was the manufacturer?  
6 A. Wilson Assembly Plant, because of the Y.  
7 Q. Okay, same place.  
8 A. Yes, sir.  
9 Q. All right. And can you tell when that was  
10 delivered?  
11 A. I'm not sure if that date is shown in here.  
12 Let's see, I don't see here, just in a quick  
13 glance. Some things are shown far in, but it  
14 didn't point it out. There is a spot for bill  
15 date, MS information, but it doesn't have the  
16 date in there for some reason, I don't know why.  
17 Q. Oh-ho. Did that master control maintenance system  
18 look changed at some point?  
19 A. I'm not sure what you mean, that, I'm not that  
20 familiar with the details of how it's  
21 administered, so --  
22 Q. Okay.  
23 MR. O'BRIEN: Well here's another one, let's  
24 have that marked.  
25 (COMPLAINT MARKED AS PLAINTIFF'S EXHIBIT  
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1 (EXHIBIT 4 FOR IDENTIFICATION.)  
2 A. You mean as far as the format?  
3 Q. Right.  
4 A. It may very well have had a computer upgrade at  
5 some point in time.  
6 MR. STARR: I have the same objections to  
7 these questions.  
8 A. And that's just speculation on my part, I'll be  
9 honest with you.  
10 Q. I understand. That's a more recent form. What's  
11 the complaint date on that particular one?  
12 A. The last, the date is November 4<sup>th</sup> -- I'm sorry,  
13 the date is May 18, 1989.  
14 Q. Okay, now. Is there any, is there -- did that  
15 space for bill date, is it removed from there or  
16 is there a space for the bill date on that?  
17 A. Model year, mileage -- I don't see the space in  
18 here. There are other ways, you know, that we  
19 may get that which is why I brought along  
20 Exhibit Number 2.  
21 Q. If you receive a complaint now from a consumer  
22 and that consumer says, my 1981 Lincoln Town car  
23 engine fire and I have it down at the garage,  
24 it's stored as you can go out and look at it. Do  
25 you just run this computer check and find out

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1 that it was built before the recall so there's  
2 no reason to go out? Or do you go out?  
3 A. I'm not sure what the customer service people do  
4 on the first morning. I believe that, because of  
5 the age of these vehicles and mileage on them,  
6 there are probably the reasons that they suggest  
7 that the person contact their insurance company  
8 first.  
9 Q. Um-hm.  
10 A. Because the vehicle has been out in the field a  
11 long time and it's beyond it's warranty period,  
12 and their insurance company is probably the best  
13 place to start. As you will know and you come in  
14 before the arbitration business, ah, it's not  
15 too shy about bringing these things to our  
16 attention. So I think our customer systems  
17 center tells them to see their insurance company  
18 first.  
19 (Deposition went off the record for a short  
20 period of time)  
21 MR. O'BRIEN: Mark this please. I'm not  
22 going to do all these, gentlemen.  
23 (COMPLAINT MARKED AS PLAINTIFF'S EXHIBIT  
24 NUMBER 5 FOR IDENTIFICATION.)  
25 MR. STARR: Same continuing objections.  
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Q. If you could, what's that particular document, who's the person that complaining about the fire there?

A. Of the listed customer is ~~XXXXXXXXXXXX~~

Q. Just where does he reside?

A. In Lee's Summit, Missouri.

Q. And what kind of vehicle did he have?

A. This is a 1992 Town car with 71,000 miles on it.

Q. So it fits pretty much the same as Dr. and Mr. Rhodes car, generally, is that right?

A. Similar.

Q. Okay. And what is his complaint?

A. Customer alleges on May 21, '94, was driving on a highway and noticed smoke coming from under the hood, pulled over and there was flames coming from the left front wheel. Requested vehicle to dealer for diagnosis. Has not contacted insurance company at this time.

Q. Okay. As I comment, and I don't want to mischaracterize this, essentially, if someone complains to Ford about this situation, the Lincoln Town car catching fire, that it's Ford's policy to direct them to their own insurance company?

A. And/or the dealer, I think, it seems like in

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this case, customer -- well I'm sorry, no. The customer went to the dealer and the cost -- the dealer they referred the customer to the customer assistance center \$25 million.

Q. Okay. And what did customer assistance do about this claim?

A. They -- let's see, we -- customer assistance center advised the customer that the warranty excludes prior. There is no assistance offered by FMC. Refer customer to insurance company.

Q. Okay. So essentially since there was no warranty coverage, Ford decided not to do anything about this claim. Is that right?

A. The vehicle was beyond its warranty coverage.

Q. Now would you compare for me the VIN number on that particular claim and Dexter and Mr. Rhodes VIN numbers?

A. Okay.

Q. What can we tell about those vehicles?

A. Again there's one small difference in the seventh digit and I'm not exactly sure which --

Q. Can we tell it's a Lincoln Mer-

A. -- absolutely a 1991 Lincoln Town car.

Q. All right. And can we tell where it was manufactured?

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A. Victim Assembly Plant.

Q. Now, those last six numbers, what are the last six numbers there?

A. Is the -- in ~~XXXXXXXXXX~~ vehicle they were 641345.

Q. Okay. And Dr. and Mr. Rhodes is 641341.

A. Yes.

Q. Now is your testimony that those vehicles, those VIN numbers could have been built months apart at the assembly line?

A. Yes, sir. I would have no confidence in a build date until I ran this number through the computer system.

Q. Okay. Do you whether or not Ford ran that through the computer system?

A. No, I don't.

Q. And what's the date of the complaint?

A. The original call was May 20<sup>th</sup>, I think it's of 1994 --

Q. Is your testimony there was not an ignition switch recall on the Ford Town, Lincoln Town car?

A. The 1991 model year Town car.

Q. Okay. When was the ignition switch recall?

A. In the late 80s, I believe it was the 88 --

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1988, 1989 Town car.

Q. Okay. Now, in fact there was a recall window established by Ford in that recall as well, a period of manufacturing, is that right?

A. Yes, sir.

Q. Based on your experience at Ford, did you subsequently learn that there were vehicle fires involved in 1990 -- or that Lincoln Town car, because the ignition Town switch then were outside of the window of that recall?

A. I'm sorry, are you talking about 88s or the late 80s --

Q. I'm talking about the one with the ignition switch.

A. The ignition switch?

Q. Right.

A. I'm not as familiar with the ignition switch, but knowing the policy is to try and correct in a larger population. I know on the ignition switch recall we recall far more vehicles than we suspected might have the condition.

Q. And you don't know whether Ford found out later that there were fires involved in that defective ignition switch that were outside of that population?

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1 A. I'm not aware that there is any information to  
2 that effect, no.  
3 Q. I've been supplied with a list of lawsuits. The  
4 case that you met with Mr. Johnson, South  
5 Carolina. Do you know who's plaintiff's counsel  
6 is in that case?  
7 A. You mean in was a fire scene, it just occurred.  
8 I'm not sure that there were any sides drawn yet  
9 --  
10 Q. Okay.  
11 A. -- I'm not even sure who will be representing  
12 at the time. I think, as insurance company, but  
13 I don't know which one.  
14 Q. Okay. Do have any cases involving the Lincoln  
15 Town car's defection which with the plants from  
16 Rosen and Conrad that you're involved in?  
17 A. The plaintiff attorney's claim, yes I've --  
18 Q. Rosen and Conrad  
19 A. -- heard the same before --  
20 Q. I've been supplied with a list of lawsuits by  
21 counsel, as I see it, I don't want to dis-  
22 categorize, there's four here, is that right?  
23 MR. O'BRIEN: Let's mark that.  
24 (LIST OF LAWSUITS SUBMITTED AS PLAINTIFF'S  
25 EXHIBIT NUMBER 8 FOR IDENTIFICATION.)

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1 Q. We've shown you a document which we've had  
2 marked and it lists four lawsuits, one in  
3 Mississippi, one in Georgia and two in Texas. To  
4 your knowledge, is that the only lawsuits that  
5 Ford is involved in with this '83 Lincoln Town  
6 car?  
7 A. I've gotta check the top here, what it says, is  
8 the spirit of cooperation, the following is a  
9 list of lawsuits received by Ford opposite  
10 general counsel as of October 29, 1989, that may  
11 have alleged a non-collision fire in '83 Lincoln  
12 Town car vehicle. It sounds to me as if someone  
13 had asked them to give them a list of lawsuits  
14 that were active on October 29, '89, where the  
15 allegation was, that it was the recalled part  
16 that caused the fire. Since the recall had only  
17 become public in May of 1989, June, July,  
18 August, September, October --  
19 Q. But it says --  
20 A. There are how many had gotten to the point of  
21 suing a lawsuit within those first five months.  
22 I think, if I understand the words on top  
23 correct. To specify the nature of the accident  
24 or to identify clearly the alleged product  
25 defect. It sounds as if it has, that this is the

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1 list of cases where it was specifically stated in  
2 the lawsuit, this recall, the spread control  
3 activation switch caused this fire, period.  
4 Q. Now read the second sentence and see if that  
5 doesn't change.  
6 A. -- defect. In the spirit of co-operation, the  
7 following is a list of lawsuits received by Ford  
8 office of the general counsel as of October 29,  
9 1989 that may have alleged a non-collision fire  
10 in '83 Lincoln Town car vehicles.  
11 Q. Do you agree with me that this is a list of non-  
12 collision fires in 1983 Town car vehicles?  
13 MR. STARK: I object to the fact to that  
14 question.  
15 A. I'm not sure what the words on the top of that  
16 page are trying to say. What I know of these  
17 cases, I believe they are the only ones that had  
18 a specific allegation that said, this recall  
19 switch caused this fire, period.  
20 Q. Okay. In the cases that are here, there are only  
21 the cases that allege that this recall switch  
22 was the cause of the fire?  
23 A. That's what I, I think is true, yeah. Looking at  
24 the words at the top and what I know of those  
25 cases.

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1 Q. Are you the expert in any or all three cases?  
2 A. I am the designing analyst engineer handling the  
3 two Robert cases, [REDACTED] and [REDACTED]  
4 Q. And what about [REDACTED] and [REDACTED]  
5 [REDACTED]  
6 A. I am not the designing analyst engineer on  
7 them.  
8 Q. Now, you mentioned earlier plaintiff's counsel  
9 in Houston, is that the counsel that's working  
10 on those two cases?  
11 A. Yes, I think so. I'm not certain of that. I have  
12 to go back and check my file.  
13 Q. And are you the expert on any other cases  
14 involving a 1983 Lincoln Town car vehicle?  
15 A. Yes.  
16 Q. How many other cases?  
17 A. I have to double check my files but, the other  
18 question in my mind, is how many of them were  
19 insurance claims and how many --  
20 Q. Well, that doesn't make a difference, it doesn't  
21 make any difference to me.  
22 A. You know, as I've said, I've looked at about  
23 twenty or twenty-five of them. I believe and I'm  
24 gonna guess that maybe half of those have some  
25 sort of activity going on, whether it be a

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1 lawsuit or insurance claim.  
2 Q. So you've looked at twenty to twenty-five cases  
3 involving a fire to the 1992 Lincoln Town car,  
4 is that right?  
5 A. Which had the speed control deactivation switch  
6 on it, yes.  
7 Q. I thought, I thought that only the cases listed  
8 have up the case that had the speed control.  
9 A. No, no. These are the cases where the allegation  
10 in the lawsuit itself was against the speed  
11 control switch.  
12 Q. Okay. So we have 1, 2, 3 cases where there's an  
13 allegation and complaint that the fire was  
14 caused by the speed control switch. Now, you've  
15 looked at twenty to twenty-five cases involving  
16 a Lincoln Town car.  
17 MR. SWARTZ: I object to the form of that  
18 question does not accurately reflecting what  
19 that document you're referring to, which is  
20 Plaintiff's Exhibit Number 6, says at the top.  
21 Q. Now how many cases have you looked at in Lincoln  
22 Town cars where the switch was not involved?  
23 A. I've looked at a sample, I would say two or  
24 three Lincoln Town cars that are not in this  
25 small population. Is that, is that what you're

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1 asking?  
2 A. Yes.  
3 Q. Okay. I would say two or three, it's my memory  
4 again, I didn't want to go back and review my  
5 files and it be --  
6 Q. Now, I just want to make sure I understand this.  
7 No there are the only cases that are in  
8 litigation, involving a Lincoln Town car, three  
9 four cases with the Ford Motor Company, is that  
10 right?  
11 MR. SWARTZ: I object to the form of that  
12 question, it's inaccurately reflecting what that  
13 document says.  
14 Q. All right. Tell me, how many cases does Ford,  
15 how many cases in litigation where you've been  
16 sued, is Ford involved in, involving a 1991  
17 Lincoln Town car?  
18 MR. SWARTZ: And I object to that question on  
19 the grounds of relevancy.  
20 A. And I have to answer the question that I don't  
21 know. I want to go back and check our records.  
22 Q. Is that an implied question? Can you do that?  
23 A. I guess I can, yeah. It's just a matter of  
24 counting them up, I guess.  
25 Q. You have no idea how many that might be?

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1 A. Well as I said earlier, I believe, all  
2 unrepresented, there's a somewhere between two and  
3 three hundred that have come to our office in  
4 either, you know, an insurance, insurance case  
5 or a lawsuit.  
6 Q. Do you know whether a Mr. Tony Clayton has filed  
7 a lawsuit against Ford over his 1992 Lincoln  
8 Town car?  
9 MR. SWARTZ: Object on the grounds of  
10 relevancy.  
11 A. I don't recognize the name.  
12 Q. You know whether Mr. William Henshaw has filed  
13 a lawsuit saying his Lincoln Town car caught  
14 fire and burnt the car and burnt his house?  
15 MR. SWARTZ: Same objection.  
16 A. That name sounds familiar. I do not know if it  
17 was a lawsuit or an insurance claim.  
18 Q. When the proportionate valve is in place in the  
19 engine, is it your testimony when that changed,  
20 when you changed from a vacuum to an electric  
21 system, that that proportionate valve remains in  
22 the same place in that engine?  
23 A. As far as the bracket in the valves are concerned,  
24 yes. The only thing that's different is the  
25 switch is now actuated.

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1 Q. And that was done by essentially drilling a hole  
2 into that, creating existing --  
3 A. It's a little more elaborate than that --  
4 Q. I see.  
5 A. -- there's actually a right angle path that goes  
6 through there, so, and it has to be -- to make  
7 the proportionate valve function correctly,  
8 there's a little tiny hole inside that has to be  
9 machined out just right, so it's a little more  
10 elaborate than just, being a hole in it --  
11 Q. I see.  
12 A. -- and answer in the past, but in essence, that's  
13 what it is. It's just machined differently.  
14 Q. And when the vacuum system was done away with,  
15 what parts were done away with?  
16 A. The speed control module itself, which was a  
17 separate little box with the electronics in it.  
18 The old one was -- I'm sorry, the new one was so  
19 much different than the old one that, that that  
20 whole part basically was, was gone.  
21 Q. Where is that in your diagram?  
22 A. It is in, let's see. Here is all this -- well,  
23 actually, I guess I didn't bring the best of  
24 all, is Defendant's Exhibit Number 1, which is  
25 the earlier production version of speed control.

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1 It's not depicted on the picture that I brought.  
2 But the speed control module is mounted along  
3 the driver's side fender, which, right along  
4 the top of the fender. Much the same way as the  
5 new electric module is. The electric module is  
6 basically mounted in the same space.

7 This part here, which is called the speed  
8 control servo assembly goes away. As we no  
9 longer use vacuum to move the throttle cable.  
10 The hoses, all of the vacuum hoses, this vacuum  
11 manifold, the valve assembly and then another  
12 part that's not shown on this diagram, but the,  
13 the dump valve, the vacuum dump valve, which is  
14 inside on the brake pedal. All of these are  
15 normal parts. We're no longer required, as they  
16 all come off and they were replaced by just the  
17 one electric module, which had the motor in it,  
18 and I do believe that the throttle cable, that  
19 it would tend to change slightly because of some  
20 length differences and that sort of thing and  
21 the way it's connected.

- 22 Q. Now big is the speed control box?  
23 A. The speed control module itself.  
24 Q. Module, yes.  
25 A. The new module is probably --

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- 1 Q. No, I'm talking about the old one.  
2 A. The old module? Don't hold me to this too hard.  
3 I would say it's about a three by five inch box,  
4 about an inch thick, I'm gonna try and recall  
5 free memory. And the new electric vacuum is  
6 slightly larger, because it also houses the  
7 motor and clutch. Basically --

8 Q. Okay. And are they plainly visible when you look  
9 in the engine?

10 A. Of a regular Ford car if you open the hood, yes.

11 Q. Okay.

12 A. Yes.

13 Q. And the other parts that were removed from the  
14 valve control system, would you describe those  
15 for me?

16 A. The other parts. So are the hoses and the servo  
17 up-hat.

18 A. They are also easily recognizable if you open  
19 the hood, yes.

20 Q. And as part of your investigation and  
21 examination, do you look in the photographs and  
22 make a determination that the old speed control  
23 device and valves are not there. Do you look at  
24 that at all?

25 A. From what I saw in the pictures, I could not

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1 determine if either the new module with the  
2 motor in it, or the old module with the vacuum  
3 valves in it was there.

4 Q. Did you see either one?

5 A. That picture just wasn't taken. I didn't see  
6 signs of either one. Okay.

7 Q. And it is mounted on the driver's side left?

8 A. Yeah. The rear portion of the engine compartment  
9 right in front of driver's position, basically.  
10 The package space that was to be used by the old  
11 speed control was where the new speed control  
12 module was located.

13 Q. And what materials are these made of?

14 A. The old vacuum system, servo mechanism was  
15 predominantly plastic, because it had to be all,  
16 to hold the vacuum that it used to move the  
17 cable with. And a rubber diaphragm inside of it  
18 that had to flex, so it had to be a soft  
19 material. And it's typically something that  
20 would be consumed in a fire of this magnitude.

21 Q. Did it have aluminum?

22 A. It may have had some attachments and some  
23 brackets that might have been steel or aluminum  
24 but, I'd have to go back and double check the  
25 drawings and take some, but I don't think it was

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1 a lot of it, I think it was predominantly  
2 plastic.

3 Q. Okay. But when you look at the -- it was gone,  
4 is that right?

5 A. In the limited views that I have from Mr.

6 Kennedy's photographs, there was no evidence  
7 left of either one of the types of speed control  
8 system. So --

9 Q. And, according to your testimony, it would have  
10 been the earlier speed control system --

11 A. The Rhodes vehicle had an earlier speed control,  
12 so, and that being mostly plastic, it's not hard  
13 for me to accept the fact that it was all gone.  
14 So it's consumed by the fire.

15 Q. Can we say that it was disintegrated?

16 A. Expected, disintegrated, it may have possibly  
17 been affected by heat and melted and fallen down  
18 underneath the vehicle, but there was no  
19 pictures of the underside, the undercarriage of  
20 the vehicle. The ground underneath at the fire  
21 scene. Those pictures, I believe were taken at  
22 the, at a salvage yard, afterward, so there was,  
23 there was, and there were no pictures in here of  
24 any fall down materials in the fire scene that  
25 were actually kept for evidence and packaged

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1 way. So I have no way of knowing, you know,  
2 what or where certain things may have fallen or  
3 melted to in this fire scope.

4 Q. I have no further questions. Thank you very  
5 much.

6 A. Thank you, sir.

7 **IDENTIFICATION BY MR. STANLEY**

8 Q. I just have a couple of follow ups for you Mr.  
9 Hoffman. Before we finish up. Did I accurately  
10 understand you to say at some point during  
11 answering Mr. O'Brien's questions, that you  
12 thought that it was likely that this fire  
13 originated under the hood of the car in their  
14 particular case, or did I mis-understand that?

15 A. Based on the pictures that Mr. Kennedy took and  
16 the comments that were made, I think in Mr.  
17 Johnson's deposition about the eye witness  
18 report, they said that they saw fire coming from  
19 the left wheel well, which, when coupled with  
20 the progress of this fire that's shown in those  
21 pictures tells me that the fire did progress  
22 from the engine compartment to the interior of  
23 this vehicle.

24 Q. Yes, sir.

25 A. Does that answer your question?

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1 Q. It does. Because a fire may have started under  
2 the hood of this car, does that lead you to  
3 conclude necessarily that the fire started as a  
4 result of a defective product or part in the  
5 car?

6 A. No.

7 Q. Are you aware of under hood fires that have  
8 originated, that were caused by some other  
9 maintenance details, whatever you want to call it?

10 A. Absolutely. We see it all the time in our  
11 investigations.

12 Q. And can you give me some examples of what those  
13 might be?

14 A. You mean in general or specific to this set of  
15 facts.

16 Q. Specific to, starting under the hood.

17 A. Well, specific starting under the hood. One of  
18 the biggest things that we see are people who  
19 have added an equipment after they've bought  
20 their vehicle. Whether it be a bigger stereo, or  
21 a CD radio or an alarm system and these things  
22 have to be wired into vehicle electrical system and  
23 we see a lot of times where that wiring is not done  
24 to our standards. The wires are not protected  
25 well enough from fraying up against the sheet

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1 metal, rubbing against, you know, the steel  
2 parts of the vehicle.

3 Again the pictures here don't show enough  
4 detail for me to say whether this had after  
5 market accessories put on it or not, but that is  
6 one of the things that we see in a lot of our  
7 other investigations. In this particular case,  
8 this vehicle had only been sitting for five  
9 minutes, it had just been parked recently before  
10 they noticed, the witnesses noticed the fire. So  
11 it's very possible that there could have been  
12 something underneath the vehicle that was either  
13 debris that was picked up along the road or  
14 maybe they have carpeting on their garage floor.  
15 I believe this was a carpet under a home on  
16 stilts as I understood the description. I never  
17 saw any fire scene photos, as I'm just guessing,  
18 but, you know, in some homes like that, that I'm  
19 familiar with, there is an concrete pad, it's  
20 just (Inaudible) -- emission systems of our  
21 vehicles which have to operate at very high  
22 temperatures, if they come up against something  
23 that is dry, some dry material, and it's  
24 happened with ball games in some cases, where it  
25 will actually ignite the grass and a start a

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1 small brush fire because of the heat of the  
2 catalyst, so, and again I don't know.

3 I didn't see the scene, so I really can't  
4 say, but that particular scenario is one of the  
5 many theories that I can put down on the table  
6 that fit the facts. The few facts that I've got  
7 at my disposal. It could have been, you know,  
8 an oil leak, it could have been someone had  
9 checked the oil or changed the oil or added  
10 brake fluid or added power steering fluid, all  
11 of which are flammable liquids and maybe some of  
12 it was spilled on a hot manifold. I don't know,  
13 because I don't have enough facts. I was up with  
14 multiple scenarios because of that lack of  
15 facts.

16 Q. Am I correct in saying that it would be  
17 incorrect to assume that because this fire  
18 started under the hood, it necessarily started  
19 as a result of a part under the hood,  
20 effectively excluding fires?

21 A. You cannot say that just because you saw the  
22 fire coming out from under the hood that part of  
23 the vehicle was defective.

24 Q. Mr. O'Brien asked you some questions regarding  
25 the small population on the date of November 4th

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# Deposition of Mark Hoffman

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of 1981 as being the front end of the target population. In your, in your experience with looking at the vehicles you've looked at, have you ever seen a Ford car, that you investigated that caught fire, that had the electronic deactivation switch that you determined to be manufactured prior to December 4th?

A. No.

Q. Is there -- has anything that Mr. S'Erion discussed with you changed your opinion to a reasonable degree of engineering certainty that this particular vehicle, in this particular case, owned by Doctor and Ms. Rhodes, had the vacuum system versus the electronic deactivation switch in it, in it's -- under it's hood?

A. No, I'm still totally convinced that was a vacuum actuated speed control system and it did not have an electric deactivation switch.

Q. Is there any evidence in Mr. S'Erion's report, he took the photographs, anything that you derived from his reports or his photographs that lead you to doubt that statement and believe that it's possible that the deactivation switch, the electronic deactivation switch was present in that car?

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A. No.

Q. Is there anything in Mr. Johnson's deposition, any of his assumptions or any of the statements that he made, that lead you to doubt whether that -- whether you're correct and in fact there was an electronic deactivation switch in this car?

A. No, sir.

Q. Does the vacuum system involve electrical parts, electricity to deactivate the cruise control?

A. To deactivate the system it does have an on/off switch, which tells the module to turn off and it has an input from the brake pedal switch, which also turns on your brake lamp. That will also tell the module to release the throttle, and there are solenoids that operate the vacuum, servo, that actually go on and off. They're controlled by the electronic module.

Q. Are you aware of any case that Ford has, be it a case that a suit has been filed or an insurance company has reported in, or a customer has called, that Ford or any other party has determined that the vacuum system was the source of an under hood fire in one of these Ford cars?

A. No, I'm not aware of any.

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Q. I don't have any further questions.

RE-CROSS EXAMINATION BY MR. JOHNSON

Q. One other question. Are you aware of this lawsuit filed by Mr. Daniel Rieley in Boston Massachusetts?

MR. SWARTZ: Object to that on the grounds of relevancy.

A. And so, sir. That case does not ring a bell.

Q. I have no further questions, thank you.

(Deposition concluded at 1:18 o'clock p.m.)

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STATE OF SOUTH CAROLINA

C-B-E-T-I-P-I-C-A-T-I-O-N

COUNTY OF HURLEY

I, Lisa Crabtree, Court Reporter and Notary Public, certify that I did have Mark Hoffman to appear before me on 1/14/81 on Tuesday, June 20, at the law office of Nelson, Mullins, Riley & Scarborough, Poughkeepsie Centre, Suite 301, 811 North Oak Street, Myrtle Beach, South Carolina; that the witness was sworn and cautioned to tell the truth, the pages constitute a true and accurate transcript of the testimony given at that time and place.

I further certify that I am not of record or kin to any of the parties to this cause of action, nor am I interested in any manner in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this the 27th day of July, 1980.

Lisa Crabtree  
Notary Public for South Carolina  
My Commission Expires:  
4/26/1982

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RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA 1-800-822-8711

# Vehicle Information Report

## GENERAL VEHICLE INFORMATION:

### (Related Claims)

VIN: 1LNLMK2W5NY640551 Veh Line: C/VB - TOWN CAR (PNC6/PN116) [91-97] Eng Serial No: W  
 Model Year: 1992 Market Derivat: C/M - L-M DIVISION DERIVATIVE Body Style: \*  
 Veh Type: C Drive Code: C/B - 2 WEL L/H REAR DRIVE Engine: C/VN - 3-M 4.6L BOHC EFI N  
 Inv. Dealer: 10104 Body Csh Style: C/C - 4 DOOR SEDAN-6 LITE Transmission: C/D - 4 SPD AUTO TRANS  
 Version/Serial: C/ER - SIGNATURE VERSION

## BUILD INFORMATION:

Region: NA - 400000000 Plant: BA - WIXOM PLANT BUILD  
 Country: USA - 000000000 Prod Date: 17-OCT-1991

## SALE INFORMATION:

Region: NA - 000000000 Selling Dealer: 326060 - \*  
 Country: USA - 000000000 Selling Dir StProv: GA  
 Buyer StProv: FL

Arrival Date: 24-OCT-1991 Red Carpet Lease: 1  
 Sale Date: 31-OCT-1991 Fleet/Retail/Co. Lease: R  
 Warranty Start Date: 31-OCT-1991 Modified Vehicle: \*  
 Orig Warranty Date: 31-OCT-1991 Reacquired Vehicle: \* Vehicle Export Flag: N

## YOC/EOC:

1 2 3 4 5 6 7 8 9  
 000000000 45 1 1400000 AX D 775 17A 4 2 LGL E 200000 4 NE CY E Y  
 LGLS 1 D 785A OFF

**INSTALLED OPTION INFORMATION:**

|                        |                                |                         |                                 |
|------------------------|--------------------------------|-------------------------|---------------------------------|
| Air Conditioning:      | C/C - ATC AIR CONDITIONER      | GVW Code:               | -                               |
| Alternator Amp Rating: | *                              | GVW Class Code:         | L                               |
| Audio Dials:           | * - [N/A]                      | Instrumentation:        | AC - ELECTRONIC INSTRUMENTATION |
| Audio Radio:           | * - [N/A]                      | Mirror(Driver Side):    | * - [N/A]                       |
| Audio Type:            | * - [N/A]                      | Mirror(Passg Side):     | * - [N/A]                       |
| Battery Amp Rating:    | 72                             | Paint:                  | FMMS - TWILIGHT BLUE CC         |
| Brake Code:            | FRAAB - 4 WHL ANTI-LOCK BRAKES | Power Antenna:          | * - [N/A]                       |
| Brake Code(Service):   | * - [N/A]                      | Radio:                  | AQ - ELITE PREMIUM AM/FM STEREO |
| Calibration Code:      | 11ED905A                       | Sound System:           | * - [N/A]                       |
| Color(Access):         | * - [N/A]                      | Steering Tapering Axle: | * - [N/A]                       |
| Color(Trim):           | * - [N/A]                      | Tire Brand:             | AJ - MICHELIN TIRE VENDOR       |
| Delivery Type:         | R                              | Tire Size:              | DSGEF - P215/70R15 WSW          |
| Drivetrain Code:       | *                              | Traction Control:       | * - [N/A]                       |
| Front Seat:            | * - [N/A]                      | Wheel Base:             | * - [N/A]                       |
| Fuel Type:             | * - [N/A]                      |                         |                                 |

**ESP INFORMATION: EMISSIONS INFORMATION:**

|                      |                          |             |
|----------------------|--------------------------|-------------|
| ESP Code:            | * Emission Code:         | C/B - C/B   |
| ESP Coverage(Miles): | * Emission Cert Type:    | F           |
| ESP Coverage(Time):  | * Emission Decal Suffix: | HFH         |
| ESP Plan Year:       | * Engine Family:         | NFM46V3PD70 |
| ESP Signature Date:  |                          |             |

Any comments? You can contact

[webmaster@gwa-ford.com](mailto:webmaster@gwa-ford.com)

# Standard Claims List For Model Year 1992

Note: All Costs are in US Dollars

| ILNLM2W5NY640531 | C/VB     | C/M       | C/PC                          | C/ER       | C/B         | BA          | C/DC  | C/VN           | 17-OCT-1991 | 31-OCT-1991 | 326080 | USA | 0  | 6 |
|------------------|----------|-----------|-------------------------------|------------|-------------|-------------|-------|----------------|-------------|-------------|--------|-----|----|---|
| AWS Claim Key:   | 11920326 | Trx Code: | 823                           | Labor Hrs: | 2           | Labor Cost: | 94    | Material Cost: | 20.15       | T           |        |     |    |   |
| Dir Cd-Sub Cd:   | 10104-*  | Name:     | FRANK JACKSON LINCOLN MERCURY | Pln:       | 770-6689600 | St:         | GA    | City Cd:       | USA         | R           |        |     |    |   |
| Cost Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| Tech Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| ILNLM2W5NY640531 | C/VB     | C/M       | C/PC                          | C/ER       | C/B         | BA          | C/DC  | C/VN           | 17-OCT-1991 | 31-OCT-1991 | 326080 | USA | 10 | 5 |
| AWS Claim Key:   | 11920330 | Trx Code: | 1                             | Labor Hrs: | 2.3         | Labor Cost: | 108.1 | Material Cost: | 0           | T           |        |     |    |   |
| Dir Cd-Sub Cd:   | 10104-*  | Name:     | FRANK JACKSON LINCOLN MERCURY | Pln:       | 770-6689600 | St:         | GA    | City Cd:       | USA         | R           |        |     |    |   |
| Cost Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| Tech Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| ILNLM2W5NY640531 | C/VB     | C/M       | C/PC                          | C/ER       | C/B         | BA          | C/DC  | C/VN           | 17-OCT-1991 | 31-OCT-1991 | 326080 | USA | 11 | 1 |
| AWS Claim Key:   | 11920328 | Trx Code: | 1                             | Labor Hrs: | 3           | Labor Cost: | 14.1  | Material Cost: | 17.33       | T           |        |     |    |   |
| Dir Cd-Sub Cd:   | 10104-*  | Name:     | FRANK JACKSON LINCOLN MERCURY | Pln:       | 770-6689600 | St:         | GA    | City Cd:       | USA         | R           |        |     |    |   |
| Cost Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| Tech Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| ILNLM2W5NY640531 | C/VB     | C/M       | C/PC                          | C/ER       | C/B         | BA          | C/DC  | C/VN           | 17-OCT-1991 | 31-OCT-1991 | 326080 | USA | 11 | 6 |
| AWS Claim Key:   | 11920328 | Trx Code: | 1                             | Labor Hrs: | 3           | Labor Cost: | 37.6  | Material Cost: | 14.14       | T           |        |     |    |   |
| Dir Cd-Sub Cd:   | 10104-*  | Name:     | FRANK JACKSON LINCOLN MERCURY | Pln:       | 770-6689600 | St:         | GA    | City Cd:       | USA         | R           |        |     |    |   |
| Cost Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| Tech Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| ILNLM2W5NY640531 | C/VB     | C/M       | C/PC                          | C/ER       | C/B         | BA          | C/DC  | C/VN           | 17-OCT-1991 | 31-OCT-1991 | 326080 | USA | 11 | 5 |
| AWS Claim Key:   | 11920327 | Trx Code: | 1                             | Labor Hrs: | 2.3         | Labor Cost: | 117.3 | Material Cost: | 435.42      | T           |        |     |    |   |
| Dir Cd-Sub Cd:   | 10104-*  | Name:     | FRANK JACKSON LINCOLN MERCURY | Pln:       | 770-6689600 | St:         | GA    | City Cd:       | USA         | R           |        |     |    |   |
| Cost Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| Tech Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| ILNLM2W5NY640531 | C/VB     | C/M       | C/PC                          | C/ER       | C/B         | BA          | C/DC  | C/VN           | 17-OCT-1991 | 31-OCT-1991 | 326080 | USA | 28 | 3 |
| AWS Claim Key:   | 11920334 | Trx Code: | 93B31                         | Labor Hrs: | 3           | Labor Cost: | 13.69 | Material Cost: | .66         | T           |        |     |    |   |
| Dir Cd-Sub Cd:   | 10104-*  | Name:     | FRANK JACKSON LINCOLN MERCURY | Pln:       | 770-6689600 | St:         | GA    | City Cd:       | USA         | R           |        |     |    |   |
| Cost Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| Tech Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| ILNLM2W5NY640531 | C/VB     | C/M       | C/PC                          | C/ER       | C/B         | BA          | C/DC  | C/VN           | 17-OCT-1991 | 31-OCT-1991 | 326080 | USA | 28 | 7 |
| AWS Claim Key:   | 11920333 | Trx Code: | 824                           | Labor Hrs: | 1           | Labor Cost: | 51.29 | Material Cost: | 342.16      | T           |        |     |    |   |
| Dir Cd-Sub Cd:   | 10104-*  | Name:     | FRANK JACKSON LINCOLN MERCURY | Pln:       | 770-6689600 | St:         | GA    | City Cd:       | USA         | R           |        |     |    |   |
| Cost Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |
| Tech Comments:   |          |           |                               |            |             |             |       |                |             |             |        |     |    |   |

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1LNLM82W3NY640351 C/VB CM C/P C/R C/B BA C/D C/VN 17-OCT-1991 31-OCT-1991 32660 USA 28 2  
 AWS Claim Key: 11920324 Trz Code: B4 Labor Hrs: 1 Labor Cost: 51.29 Material Cost: 0 T  
 Dir CA-Sub Cdr: 10104- Name: FRANK JACKSON LINCOLN Ph: 770-6689600 St: GA City: Ch USA R  
 Cust Comments: RATTLE IN DASH (R01)  
 Tech Comments: NOISE 56 WAR 32311 ROAD TEST R R DASH FOR ACERS TO REPAIR DASH BRACE ON RIGHT DASH

1LNLM82W3NY640351 C/VB CM C/P C/R C/B BA C/D C/VN 17-OCT-1991 31-OCT-1991 32660 USA 28 2  
 AWS Claim Key: 11920331 Trz Code: B4 Labor Hrs: 2 Labor Cost: 104.6 Material Cost: 0 T  
 Dir CA-Sub Cdr: 10104- Name: FRANK JACKSON LINCOLN Ph: 770-6689600 St: GA City: Ch USA R  
 Cust Comments: INSP FOR EXCESSIVE SPARK KNOCK-ADVISE  
 Tech Comments: SHDS KORO II KOER III POWER BAL SPARK DUR FUEL TR ST REL COMP. UNABLE TO DUPLICATE AT THIS TI

1LNLM82W3NY640351 C/VB CM C/P C/R C/B BA C/D C/VN 17-OCT-1991 31-OCT-1991 32660 USA 28 6  
 AWS Claim Key: 11920332 Trz Code: B4 Labor Hrs: 2.5 Labor Cost: 146.41 Material Cost: 0 T  
 Dir CA-Sub Cdr: 10104- Name: FRANK JACKSON LINCOLN Ph: 770-6689600 St: GA City: Ch USA R  
 Cust Comments: FT BUMPER IS PERLING (P01)  
 Tech Comments: REFINISH FRONT BUMPER COVER

Any comments? You can contact



[webmaster@aws-ford.com](mailto:webmaster@aws-ford.com)

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920526

## Vehicle Information

Model Year: 1992  
 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: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: 1LNLM82W5NY640551

## Claim Information

Document Number: 113903  
 Repair Date: 24-OCT-1991  
 Distance: 3  
 TIS: 0

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 94  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: 20.15  
 Total Cost Gross: 114.15

Cust. Concern Code: AN\* -

Condition Code: C8 - INDUSTRIAL/ENVIRONMENTAL FALLOUT

Technician Comment:

Customer Comment:

| Laber On Code | Laber On Description                         | Laber On Cost |
|---------------|----------------------------------------------|---------------|
| P626          | POLISH AND BUFF REPAIR - 4 DOOR - BOTH SIDES | 0             |

| Cancel | Full Part Number | Part  | Part | Extended             |        |          |        |
|--------|------------------|-------|------|----------------------|--------|----------|--------|
| Flag   | PREF             | BASE  | SUFF | Description          | CPSC   | Quantity | Amount |
| Y      | *                | ENTRE | *    | MULTI PNL PAINT REPR | 011801 | 0        | 0      |
| N      | *                | MAT   | *    |                      | 011801 | 1        | 0      |

W002-025-B 1021

Any comments? You can contact



[webmaster@aws-ford.com](mailto:webmaster@aws-ford.com)

5902-025-B 1022

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920530

## Vehicle Information

Model Year: 1992  
 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/VE-TOWN CAR (FN36/FN116)  
 [91-97]  
 Warranty Start Date: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: 1LNLM82W5NY640551

## Claim Information

Document Number: 067408  
 Repair Date: 25-AUG-1992  
 Distance: 9441  
 TIS: 10

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 108.1  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: 0  
 Total Cost Gross: 108.1

Cust. Concern Code: N22 - VEHICLE VIBRATES WHEN DRIVING BELOW 45 MPH  
 Condition Code: D9 - OUT OF BALANCE  
 Technician Comment: CHECK RUNOUT BALANCE 4 WHEELS  
 Customer Comment: VIBRATION WHILE DRIVING

| Labor Op Code | Labor Op Description                | Labor Op Cost |
|---------------|-------------------------------------|---------------|
| 1007D         | NOISE/VIBRATION/HARSHNESS DIAGNOSIS | 0             |
| 1007D1        | TIRE AND WHEEL CHECK RUN-OUT        | 0             |
| 1015DT        | WHEEL AND TIRE ASSEMBLY BALANCE     | 0             |

| Causal Flag | Full Part Number | Part Description  | Part CPSC | Extended Quantity | Amount |
|-------------|------------------|-------------------|-----------|-------------------|--------|
| Y           | * ALBAL *        | ALL WHEEL BALANCE | 040402    | 0                 | 0      |

EP82-825-B 1823

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Any comments? You can contact



[mabmasur@aws-ford.com](mailto:mabmasur@aws-ford.com)

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920528

## Vehicle Information

Model Year: 1992  
 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: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: 1LNLM82W5NY640551

## Claim Information

Document Number: 067407  
 Repair Date: 26-AUG-1992  
 Distance: 9441  
 TIS: 11

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 14.1  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: 17.33  
 Total Cost Gross: 31.43

Cust. Concern Code: N11 - UNUSUAL ENGINE NOISE AT IDLE  
 Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)  
 Technician Comment: REPLAC DRIVE BELT  
 Customer Comment: SQUEAK FROM ENGINE

| Labor Op Code | Labor Op Description      | Labor Op Cost |
|---------------|---------------------------|---------------|
| 8620F         | BELT - SERPENTINE REPLACE | 0             |

| Causal Flag | Full Part Number | Part Description     | Part CPSC | Extended Quantity | Extended Amount |
|-------------|------------------|----------------------|-----------|-------------------|-----------------|
| Y           | * 8620 *         | BELT-W/PUMP FAN&GENE | 030507    | 0                 | 0               |
| N           | JK7 863 B        |                      | NANANA    | 1                 | 0               |

Any comments? You can contact



[webmaster@aws-ford.com](mailto:webmaster@aws-ford.com)

# Claim Detail Report

*Note: All costs are in US dollars*

Model Year = 1992; Claim Key = 11920529

## Vehicle Information

Model Year: 1992  
 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: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: ILNLM82W5NY640551

## Claims Information

Document Number: 067407  
 Repair Date: 26-AUG-1992  
 Distance: 9441  
 TIS: 11

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 37.6  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: 14.14  
 Total Cost Gross: 51.74

Cust. Concern Code: R30 - OTHER WIND NOISE TROUBLES (TURBULENCE)  
 Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)  
 Technician Comment: RESEAL WINDSHIELD  
 Customer Comment: WINDNOISE FROM WINDSHIELD

| Labor Op Code | Labor Op Description                           | Labor Op Cost |
|---------------|------------------------------------------------|---------------|
| 69000A        | DOOR AND WINDOW - WIND NOISE/WATER LEAKS CHECK | 0             |
| 03144A        | MOULDING-WINDSHIELD TOP REPLACE                | 0             |

| Cancel | Full Part Number |        |      | Part                  |        | Part     | Extended |
|--------|------------------|--------|------|-----------------------|--------|----------|----------|
| Flag   | PREF             | BASE   | SUFF | Description           | CPSC   | Quantity | Amount   |
| Y      | *                | 703144 | *    | MLDG W SHLD OUT       | NANANA | 0        | 0        |
| N      | D6AZ             | 19562  | BA   | GASKET A/C COMPRESSOR | NANANA | 2        | 0        |

8902-025-B 1027



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Any comments? You can contact



[webmaster@cpa-ford.com](mailto:webmaster@cpa-ford.com)

## Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920527

### Vehicle Information

Model Year: 1992  
Market Derived: C/M - L-M DIVISION DERIVATIVE  
Body/Cab Type: C/PC - 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: 31-OCT-1991  
Production Date: 17-OCT-1991  
VIN: 1LNLM82W5NY640551

### Claim Information

Document Number: 067407  
Repair Date: 26-AUG-1992  
Distance: 9441  
TIS: 11

### Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
MERCURY  
Dealer Code: 10104 - \*  
Address: 7555 ROSWELL ROAD  
City: ATLANTA  
State: GA Zip Code: 30350  
Country: USA Region Code: NA  
Phone: (770)960-9600

### Expense Information

Customer Paid Amount: 0  
Deductible Amount: 0  
Dealer Paid Amount: 0  
Labor Cost: 117.5  
Misc. Expense Amount: 0  
Part Markup Amount:  
Material Cost: 425.42  
Total Cost Gross: 542.92

Cust. Concern Code: N27 - VIBRATION OR SHUDDER WHILE BRAKING

Condition Code: 13 - OUT OF ROUND

Technician Comment: REPLACE FRONT AND REAR ROTORS AND PADS

Customer Comment: BRAKE VIBRATION

| Labor Op Code | Labor Op Description                                                   | Labor Op Cost |
|---------------|------------------------------------------------------------------------|---------------|
| 2001AT        | BRAKE SHOES / PAD ASSEMBLIES - HYDRAULIC REMOVE AND INSTALL OR REPLACE | 0             |
| 2001A5T       | DISC BRAKE ROTOR REPLACE                                               | 0             |
| 2026BT        | DISC BRAKE ROTOR - REAR REPLACE                                        | 0             |

## Claim Detail

[http://cpia.pd9.ford.com/cgi-bin/v\\_cdh2x&modelyr=1992&claimkey=11920527](http://cpia.pd9.ford.com/cgi-bin/v_cdh2x&modelyr=1992&claimkey=11920527)

| Causal<br>Flag | Full Part Number<br>PREF BASE SUFF | Part<br>Description      | CPSC   | Part<br>Quantity | Extended<br>Amount |
|----------------|------------------------------------|--------------------------|--------|------------------|--------------------|
| Y              | F2VY 1125 A                        | DISC - FRONT WHEEL BRAKE | 060301 | 2                | 0                  |
| N              | F1VY 2C026 A                       | ROTOR-RR WHL DISC BK     | NANANA | 2                | 0                  |
| N              | F2VY 2001 A                        | KIT-BRAKE SHOE LININ     | NANANA | 1                | 0                  |
| N              | F2VY 2200 A                        | SHOE LINING REAR BRA     | NANANA | 1                | 0                  |
| N              | 3M 8906 *                          |                          | NANANA | 1                | 0                  |

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Any comments? You can contact

[webmaster@over-ford.com](mailto:webmaster@over-ford.com)

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920333

## Vehicle Information

Model Year: 1992  
 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: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: 1LNLM82W5NY640351

## Claim Information

Document Number: 223283  
 Repair Date: 24-JAN-1994  
 Distance: 32307  
 TIS: 28

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 15.69  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: .66  
 Total Cost Gross: 16.35

Cust. Concern Code: A99 - ADMINISTRATIVE (PARTS RETURN/ETC.)

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

Technician Comment: COMPLETED

Customer Comment: 93B31

## Labor On Code Labor On Description Labor On Cost

B31B REPLACE 0

| Causal | Full Part Number | Part  | Part | Extended                   |      |          |        |
|--------|------------------|-------|------|----------------------------|------|----------|--------|
| Flag   | PREF             | BASE  | SUFF | Description                | CPSC | Quantity | Amount |
| Y      | *                | 7F330 | *    | INSL TR THROT VALVE 070503 | 0    | 0        |        |
| N      | F3SZ             | 7H303 | B    | KIT TRANS THROT VLV 070503 | 1    | 0        |        |

Any comments? You can contact



[webmaster@qvst-ford.com](mailto:webmaster@qvst-ford.com)

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920533

## Vehicle Information

Model Year: 1992  
 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: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: 1LNLM82W5NY640531

## Claim Information

Document Number: 223281  
 Repair Date: 24-JAN-1994  
 Distance: 32307  
 TIS: 28

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 52.29  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: 342.16  
 Total Cost Gross: 394.45

Cust. Concern Code: S03 - FRONT SEAT LOOSE  
 Condition Code: 33 - LOOSE  
 Technician Comment: LOOSE 33 REPLACE SEAT TRACK ASSEMBLY  
 Customer Comment: PASS FT SEAT MOVES WHEN STOPPING (S03)

| Labo Op Code | Labo On Description               | Labo On Cost |
|--------------|-----------------------------------|--------------|
| 61704AT      | TRACK ASSEMBLY-FRONT SEAT REPLACE | 0            |

| Causal | Full Part Number | Part    | Part | Extended                |      |          |        |
|--------|------------------|---------|------|-------------------------|------|----------|--------|
| Flag   | PREF             | BASE    | SUFF | Description             | CPSC | Quantity | Amount |
| Y      | F2VY             | 5461710 | AA   | TRACK-FRONT SEAT 011001 | 1    | 0        |        |
| N      | F2VY             | 5461711 | A    | TRACK-FRONT SEAT 011001 | 1    | 0        |        |

Any comments? You can contact



[webmaster@aws-ford.com](mailto:webmaster@aws-ford.com)

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920534

## Vehicle Information

Model Year: 1992  
 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: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: 1LNLM82W5NY640551

## Claim Information

Document Number: 223282  
 Repair Date: 24-JAN-1994  
 Distance: 32307  
 TIS: 28

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 52.29  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: 0  
 Total Cost Gross: 52.29

Cust. Concern Code: N59 - OTHER SQUEAK/RATTLE (EXCLUDING WIND NOISE)

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

Technician Comment: NOISE 56 WAR 32311 ROAD TEST R R DASH FOR ACCESS TO REPAIR  
 DASH BRACE ON RIGHT DASH

Customer Comment: RATTLE IN DASH (N01)

| Labor Op Code | Labor Op Description    | Labor Op Cost |
|---------------|-------------------------|---------------|
| 04320B        | INSTRUMENT PANEL ACCESS | 0             |

| Causal Flag | Full Part Number | Part Description     | Part CPSC | Extended Quantity | Amount |
|-------------|------------------|----------------------|-----------|-------------------|--------|
| Y           | * 704320 *       | PANEL ASY-INSTRUMENT | NANANA    | 0                 | 0      |

0002-025-5 1035



Any comments? You can contact



[webmaster@aws-ford.com](mailto:webmaster@aws-ford.com)

## Claim Detail Report

*Note: All costs are in US dollars*

Model Year = 1992; Claim Key = 11920531

### Vehicle Information

Model Year: 1992  
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: 31-OCT-1991  
Production Date: 17-OCT-1991  
VIN: 1LNLM82W5NY640551

### Dealer Information:

Dealer Name FRANK JACKSON LINCOLN  
MERCURY  
Dealer Code: 10104 - \*  
Address: 7555 ROSWELL ROAD  
City: ATLANTA  
State: GA Zip Code: 30350  
Country: USA Region Code: NA  
Phone: (770)960-9600

### Claim Information

Document Number: 223281  
Repair Date: 24-JAN-1994  
Distance: 32307  
TIS: 28

### Expense Information

Customer Paid Amount: 0  
Deductible Amount: 0  
Dealer Paid Amount: 0  
Labor Cost: 104.6  
Misc. Expense Amount: 0  
Part Markup Amount:  
Material Cost: 0  
Total Cost Gross: 104.6

Cust. Concern Code: L66 - EXHAUST SYSTEM TROUBLE  
Condition Code: 42 - DOES NOT OPERATE PROPERLY  
Technician Comment: SBDS KOEO 11 KOER 111 POWER BAL.SPARK DUR FUEL TE ST REL.  
COMP. UNABLE TO DUPLICATE AT THIS TIME.  
Customer Comment: INSP FOR EXCESSIVE SPARK KNOCK-ADVISE

| <u>Labor Op Code</u> | <u>Labor Op Description</u>                             | <u>Labor Op Cost</u> |
|----------------------|---------------------------------------------------------|----------------------|
| 15650E               | SERVICE BAY DIAGNOSTIC SYSTEM (SBDS) START-UP DIAGNOSIS | 0                    |
| 15650E1              | EBC SELF-TEST DIAGNOSIS                                 | 0                    |
| 15650E2              | PIN POINT TEST (SBDS) DIAGNOSIS                         | 0                    |
| 15650E10             | POWER BALANCE / SPARK DURATION TEST                     | 0                    |
| 15650E11             | RELATIVE COMPRESSION TEST                               | 0                    |
| 15650E12             | IGNITION SYSTEM TESTS DIAGNOSIS                         | 0                    |
| 15650E20             | FUEL PRESSURE TEST & LEAKDOWN TESTS DIAGNOSIS           | 0                    |

| Causal | Full Part Number | Part | Part | Extended    |        |          |        |
|--------|------------------|------|------|-------------|--------|----------|--------|
| Flag   | PRFL             | BASE | SUFF | Description | CPSC   | Quantity | Amount |
| Y      | *                | DIAG | *    | DIAGNOSIS   | 000615 | 0        | 0      |

Any comments? You can contact



[webmaster@aus-ford.com](mailto:webmaster@aus-ford.com)

# Claim Detail Report

Note: All costs are in US dollars

Model Year = 1992; Claim Key = 11920532

## Vehicle Information

Model Year: 1992  
 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/VE-TOWN CAR (FN36/FN116)  
 [91-97]  
 Warranty Start Date: 31-OCT-1991  
 Production Date: 17-OCT-1991  
 VIN: 1LNLM82W5NY640551

## Claim Information

Document Number: 223281  
 Repair Date: 24-JAN-1994  
 Distance: 32307  
 TIS: 28

## Dealer Information:

Dealer Name: FRANK JACKSON LINCOLN  
 MERCURY  
 Dealer Code: 10104 - \*  
 Address: 7555 ROSWELL ROAD  
 City: ATLANTA  
 State: GA Zip Code: 30350  
 Country: USA Region Code: NA  
 Phone: (770)960-9600

## Expense Information

Customer Paid Amount: 0  
 Deductible Amount: 0  
 Dealer Paid Amount: 0  
 Labor Cost: 146.41  
 Misc. Expense Amount: 0  
 Part Markup Amount:  
 Material Cost: 0  
 Total Cost Gross: 146.41

Cust. Concern Code: B69 - OTHER BUMPER TROUBLES  
 Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)  
 Technician Comment: REFINISH FRONT BUMPER COVER  
 Customer Comment: FT BUMPER IS PEELING (F01)

| Labor Op Code | Labor Op Description              | Labor Op Cost |
|---------------|-----------------------------------|---------------|
| P101P         | BASIC PAINT OPERATION - ONE COLOR | 0             |
| P46P          | FRONT BUMPER                      | 0             |

| Cancel | Full Part Number | Part   | Part | Extended             |        |          |        |
|--------|------------------|--------|------|----------------------|--------|----------|--------|
| Flag   | PREF             | BASE   | SUFF | Description          | CPSC   | Quantity | Amount |
| Y      | *                | 17D957 | *    | FRT BUMPER COVER ASY | 011901 | 0        | 0      |

2202-025-B 1530

Any comments? You can contact



[webmaster@aws-ford.com](mailto:webmaster@aws-ford.com)

VIN: 1LNLM82W5NY640551  
WSD: 10/31/91

Year: 1992

Model: TOWN CAR  
Build Date: 10/17/91

| A | -----Campaign----- |      |              |                      | Status   | Dealer |
|---|--------------------|------|--------------|----------------------|----------|--------|
| C | Number             | Type | Description  | Status               | Date     | Code   |
| - | 95S19              | S    | HOOD LATCH   | RELEASED FOR MAILING | 07/21/97 | 326060 |
|   | 96L12              | L    | PASS AIR BAG | FORCED COMPLETION    | 01/22/98 | AUTOC  |
|   | 93B31              | O    | TV ROD BUSHG | COMPLETE             | 02/01/94 | N/A    |

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

OGDB079

--&gt;

VIN: 1LJLH32W5WY640551 Year: 1992 Model: TOWN CAR

Name: [REDACTED]

Trmt: [REDACTED]

Contact: [REDACTED]

Symptom:

Reason:

Dealer:

Issue Type: 8

INQ

Issue Status: 2 CLOSED

Comm Type: P

PHONE

Odometer Reading: 000001 MI

Analyst: 1791CR

ROETTIGERS

Document Number:

Action Date: 07/02/97

Action Data: N

Action Time: 12:47:38 EST

Origin Desc: GO

Action Desc:

Comments:

\*\*\*NO VIN AVAILABLE\*\*\*

\*\*\* NAVIS: SUBSEQUENT \*\*\*

CUSTOMER SAYS:

- 800# FROM DEALERSHIP

- [REDACTED] FROM [REDACTED] IS CALLING

- VEHICLE BURNED ON 10/29/96

F1=Help

F2=ActionData

F4=PrevAction

F5=NextAction

F9=PrevComments

F10=NextComments

F11=Menu

F12=Return

F13=PrevContact

F14=NextContact

MORE COMMENTS AVAILABLE

OGDB079

—&gt;

VIN: 11LHM82W5MY640551 Year: 1992 Model: TOWN CAR

Name:

Trmt:

Contact:

Symptom:

Reason:

Dealer:

Issue Type:

8

INQ

Issue Status:

2 CLOSED

Comm Type:

P

PHONE

Odometer Reading: 000001 MI

Analyst:

1791CR

ROETTIGERS

Document Number:

Action Date:

07/02/97

Action Data:

N

Action Time:

12:47:38 EST

Origin Desc:

GO

Action Desc:

Comments:

- VEHICLE BURNED ON 10/29/96
- THE CAUSE AND ORIGIN OF THE FIRE PINPOINTS TO THE AREA OF THE ENGINE
- THE FIRE STARTED UNDERNEATH THE HOOD
- THE VEHICLE WAS NOT OCCUPIED AT THE TIME
- THE VEHICLE WAS PARKED ON THE GROUND FLOOR OF A STILT HOUSE

F1-Help

F2-ActionData

F4-PrevAction

F5-NextAction

F9-PrevComments

F10-NextComments

F11-Menu

F12-Return

F13-PrevContact

F14-NextContact

MORE COMMENTS AVAILABLE

OGDB079



==&gt;

VIN: 1LMJL82W5NY640351 Year: 1992 Model: TOWN CAR

Name: [REDACTED]

Trmt: [REDACTED]

Contact: [REDACTED]

Symptom:

Reason:

Dealer:

Issue Type: 8

INQ

Issue Status: 2 CLOSED

Comm Type: P

PHONE

Odometer Reading: 000001 MI

Analyst: 1791CR

ROETTIGERS

Document Number:

Action Date: 07/02/97

Action Data: N

Action Time: 12:47:38 EST

Origin Desc: GO

Action Desc:

Comments:

- THE VEHICLE WAS PARKED ON THE GROUND FLOOR OF A STILT HOUS
- E
- THE GROUND FLOOR WAS OPEN AND THE ABOVE HOUSE WAS COMPLETE
- LY DESTROYED

F1=Help

F2=ActionData

F4=PrevAction

F5=NextAction

F9=PrevComments

F10=NextComments

F11=Menu

F12=Return

F13=PrevContact

F14=NextContact

NO MORE COMMENTS AVAILABLE

OGDB079

==&gt;

VIN: 1LWLM82W5NY640551 Year: 1992 Model: TOWN CAR

Name:

Trmt:

Contact:

Symptom:

Reason:

Dealer:

Issue Type: 8

INQ

Issue Status: 2 CLOSED

Comm Type: U

UPDATE

Odometer Reading: 000001 MI

Analyst: 1791CR

ROETTIGERS

Document Number:

Action Date: 07/02/97

Action Data: N

Action Time: 12:47:41 EST

Origin Desc: GO

Action Desc:

Comments:

\*

PER CUSTOMER, DEALER SAYS:

- NO CONTACT

\*

CUSTOMER SEEKS:

- FILE FOR THE PURPOSE OF SUBROGATION

F1=Help

F2=ActionData F4=PrevAction F5=NextAction F9=PrevComments

F10=NextComments F11=Menu

F12=Return

F13=PrevContact F14=NextContact

MORE COMMENTS AVAILABLE

OGDB079

VIN: 1L1LM82W5RY640551 Year: 1992 Model: TOWN CAR  
Name: [REDACTED]  
Trmt: [REDACTED] Contact: [REDACTED]  
Symptom:  
Reason:  
Dealer:  
Issue Type: 8 INQ Issue Status: 2: CLOSED  
Comm Type: 0 UPDATE Odometer Reading: 000001 MI  
Analyst: 1791CR ROETTIGERS Document Number:  
Action Date: 07/02/97 Action Data: N  
Action Time: 12:47:41 EST  
Origin Desc: GO  
Action Desc:

ments: - FILE FOR THE PURPOSE OF SUBROGATION

\*

CAC ADVISED:

- PLEASE WRITE TO OFFICE OF THE GENERAL COUNSEL

F1-Help F2-ActionData F4-PrevAction F5-NextAction F9-PrevComments  
F10-NextComments F11-Menu F12=Return F13-PrevContact F14=NextContact  
NO MORE COMMENTS AVAILABLE OGDR079

**STANDARD SOLUTIONS DELIVERED AS TWO 500-ML BOTTLES**

**CONSTRUCTION**

[illegible]

## FREE INFORMATION

**STANDARD VEHICLE PRICE \$34,252.00**

FURN. VEHICLE & EQUIPMENT  
 INFORMATION IN LIBRARY

15

**English Language Proficiency Assessment**

**2016-2017**

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### References

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\_\_\_\_\_

4-750 (Rev. 10-29-64)

**South American Example - Mexico**

[illegible][illegible]

**NEW YORK**

### Study findings: People who

**تجدید و ترقی**

[illegible]

**1994**      **1995**

**2000**

**Keywords:** *work, work-life balance, work-family balance, work-family conflict, work-family interface, work-family issues, work-family research, work-family studies, work-family topics, work-family variables, work-family research topics, work-family research areas, work-family research fields, work-family research domains, work-family research subjects, work-family research issues, work-family research problems, work-family research questions, work-family research topics, work-family research areas, work-family research fields, work-family research domains, work-family research subjects, work-family research issues, work-family research problems, work-family research questions*

**Abstract**

---

1

**2009 年 12 月 20 日**

CSCN140

## VEHICLE DATA

08/10/99 07:53:29

--&gt;

ENTER VIN --&gt; 1LNLM82W5NY640551

NAME --&gt; ROSE

ZIP --&gt;

MODEL YR --&gt;

OWNER NAME :

STREET ADDR :

CITY : MARIETTA

N/A YY-MM-DD 96-06-16

ST/PRV: GA CTRY:

ZIP/POSTAL CODE:

N/A SOURCE: P

MODEL YEAR : 92

PLANT: Y

SALE YY-MM-DD 91-10-31

BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES

PRODUCTION YY-MM-DD 91-10-17

VEHICLE DESC : 1992 TOWN CAR

|             | DIVISION | DISTRICT | ZONE | DEALER | PDC CODE | FCSD REGION |
|-------------|----------|----------|------|--------|----------|-------------|
| SHIP-TO     | 3        | 26       | B    | 060    | 45       | 21          |
| FACING      | 3        | 26       | B    | 060    |          |             |
| RESPONSIBLE | 3        | 26       | B    | 060    |          |             |

CA EMISSION : ENGINE TAG CODE : 1G810BA

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 03

DSO DISTRICT :

FLEET CODE : RC999

OPEN : 01 CLOSED : 02

DSO NUMBER :

FLEET STATUS : A

ACTIVE: 02 HISTORY: 01

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

OGDB079

ENTER CAMPAIGN NUMBER--> 95S19 VIN--> 1LNLM82W5NY640551 TYPE OF SEARCH: A  
MODEL YEAR: 92 DEFECT: HOOD LATCH BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
NEW STATUS CODE: CAMP DIV : 6  
REPAIR INFORMATION: TYPE CODE: SUPP CODE :  
REPAIR DATE: DEALER P/A: KIT CODE : AA  
MICRO REF: CLAIM NUM: OASIS DATE : 95-08-30  
DELETE REASON: VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 1  
CURRENT: 3 26 060 ASSIGNED: 97-12-08 SOURCE: PX EXTRACT DATE: 97-12-08  
\*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
M RELEASED FOR MAILING 97-07-21  
M RELEASED FOR MAILING 96-08-21  
M RELEASED FOR MAILING 96-02-07  
M RELEASED FOR MAILING 95-08-30  
H AWAITING MAILING 95-08-08

## 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)  
I037-NO MORE DATA TO DISPLAY

OGDB079

ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LNLM82W3NY640551 TYPE OF SEARCH: A  
MODEL YEAR: 92 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES  
NEW STATUS CODE: CAMP DIV : 6  
REPAIR INFORMATION: TYPE CODE: SUPP CODE :  
REPAIR DATE: DEALER P/A: KIT CODE : CH  
MICRO REF: CLAIM NUM: OASIS DATE :  
DELETE REASON: VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 1  
CURRENT: 3 26 060 ASSIGNED: 97-12-08 SOURCE: PX EXTRACT DATE: 97-12-08  
\*\*\*\*\* 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 97-03-05  
H AWAITING MAILING 96-11-22

## 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)  
I037-NO MORE DATA TO DISPLAY

OGDB079

=&gt;

ENTER CAMPAIGN NUMBER=> 93831 VIN=> 1LNLM62WSNY640551 TYPE OF SEARCH: H  
MODEL YEAR: DEFECT: BODY STYLE:  
NEW STATUS CODE: CAMP DIV :  
REPAIR INFORMATION: TYPE CODE: SUPP CODE :  
REPAIR DATE: DEALER P/A: KIT CODE :  
MICRO REF: CLAIM NUM: OASIS DATE :  
DELETE REASON: VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: NEW: IND: MATCH CODE:  
CURRENT: ASSIGNED: SOURCE: EXTRACT DATE:  
\*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC  
C COMPLETE B 94-02-01 223283 TZB4721 AC

## 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)  
I037-MO MORE DATA TO DISPLAY

OGDB079



CSCN150

## CAMPAIGN VEHICLE INFORMATION

08/10/99 07:53:49

ENTER CAMPAIGN NUMBER--> 93B31 VIN--> 1LNLM82W5NY640551 TYPE OF SEARCH: H  
MODEL YEAR: DEFECT: BODY STYLE:  
NEW STATUS CODE: CAMP DIV :  
REPAIR INFORMATION: TYPE CODE: SUPP CODE :  
REPAIR DATE: DEALER P/A: KIT CODE :  
MICRO REF: CLAIM NUM: OASIS DATE :  
DELETE REASON: VENDOR N/A INFORMATION:  
RESP DEALER INFORMATION: NEW: IND: MATCH CODE:  
CURRENT: ASSIGNED: SOURCE: EXTRACT DATE:  
\*\*\*\*\* STATUS INFORMATION: \*\*\*\*\* REPAIR INFORMATION: \*\*\*\*\*  
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC

## 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)

E807-END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES

OGDB079

E802-025-2 1551



DEALER 240 060

VIN 1L2LMB2WNT140551

|                                |                 |            |
|--------------------------------|-----------------|------------|
| X TWILIGHT BLUE CLEARCOAT MET  |                 |            |
| Y BRADON BLUE CLOTH            |                 |            |
| 3W .4.6L SFI V8 ENGINE         | MC              | MC         |
| 4T AUTO OVERDRIVE TRANSMISSION | MC              | MC         |
| 3P .P218/70X16 WSW TIRES       | MC              | MC         |
| TOTAL VEHICLE & OPTIONS        | 34252 00        | 29132 00   |
| DESTINATION & DELIVERY         | 590 00          | 550 00     |
| <b>TOTAL FOR VEHICLE</b>       | <b>34842 00</b> |            |
| 13 U.S. GAL GAS FACTORY        |                 | 18 20      |
| PRICED DEAL                    |                 | 50         |
| BATCH-ID 8910000002 D TD AA    |                 |            |
| SCHEDULE-B LEVEL 00000         |                 |            |
| PRICE LEVEL 215010002          | VIN: 1L2LMB     | 2WNT140551 |
| SHIPPING WEIGHT 3872 LBS.      |                 |            |

| THIS OFFER MAY NOT REFLECT THE FINAL COST OF THE VEHICLE IN VIEW OF THE POSSIBILITY OF FUTURE REBATES, ALLOWANCES, DISCOUNTS AND INCENTIVES AWARDED FROM FORD MOTOR COMPANY TO THE DEALER. THE PORTION OF THE VEHICLE PRICE WILL BE PROVIDED TO THE APPROPRIATE FORD (LMD) TO SUPPORT REGIONAL/DEALER ADVERTISING. |             |           |            |                |         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------|------------|----------------|---------|
| DEALER ADVERTISING                                                                                                                                                                                                                                                                                                 | SALES TOTAL | SALES TAX | DEALER FEE | FINANCE CHARGE | TOTAL   |
| 125.00                                                                                                                                                                                                                                                                                                             | .00         | .00       | .00        | 1025.00 2      | 8772.00 |

|                                                                                                                     |  |                                                          |                         |
|---------------------------------------------------------------------------------------------------------------------|--|----------------------------------------------------------|-------------------------|
| <b>SOLD TO</b><br>Frank Jackson Lincoln-Mercury 260060<br>555 Roswell Road<br>Atlanta GA 30350                      |  | FLAT RATE FINANCE<br>ON RETAIL PRICE<br>10/18/91<br>2602 |                         |
| <b>SHIP TO (IF OTHER THAN ABOVE)</b><br>Frank Jackson Lincoln-Mercury<br>555 Roswell Road<br>Sandy Springs GA 30350 |  | 26060<br>0 4 1                                           | 6-6038<br>YES NO<br>Y N |
| FORD CREDIT FINANCIAL<br>FORD CREDIT FINANCIAL                                                                      |  | FORD CREDIT FINANCIAL<br>FORD CREDIT FINANCIAL           |                         |

ER02-825-B 1787