

EA02-025

FORD 2-13-04

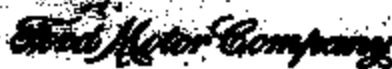
ATTACHMENT G

SNORTON1
SC

CO
10/6

1411-7

1-1041315



Office of the General Counsel

PRIVILEGED AND CONFIDENTIAL

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126-2005

February 18, 2003

Nationwide Insurance
4401 Creedmor Rd.
Raleigh, NC 27656
ATTENTION: RHONDA ADAMS

Re: Claimant: [REDACTED]
Your File #: [REDACTED]
D/E: 03-25-2002

Dear Ms. Adams,

We are in receipt of your recently submitted materials dated January 27, 2003.

It is our opinion the material submitted does not sufficiently support your allegation that Ford Motor Company is responsible for this loss. We understand that 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 it is the claimant's responsibility to preserve their evidence. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

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

Sincerely,

Shawn Norton
Claims Analyst

Spark Plugs	4.00
PCV Valve	5.98
Oil Filter	9.99
EMR Platinum gasket	5.97
Valvecover	3.99
Timing Belts	3.00
Fuel Filter	16.00

MAF Low, Recalibrate MAF.
172 EGR Not Working. Full
Open segment stuck. MAF
Preset All blocks had to stop
as to not exceed temp.
Customer Authorized.

Tab: Veh will have to be carried
to Body Shop for Hinges, Pins

Overhaul replaced.
Mile Check Engine Light still on
due to possible sensor and cannot
give not to go now.

Ad Cars 645.93

EMR-025.1 0000 TOTAL RECEIPTS



BUTLER'S AUTOMOTIVE
Check & Fixt and Repairs
General Maintenance
1248 Edgemoor Street
GREENWOOD, CT 06040
(860) 227-1272

47
1042

DATE		TIME	DATE	TIME	DATE	TIME
APR 05 2002		17:14	APR 05 2002		17:14	APR 05 2002 17:14
172 EGR Not Working		Full	172 EGR Not Working		Full	172 EGR Not Working
MAF Low, Recalibrate MAF			MAF Low, Recalibrate MAF			MAF Low, Recalibrate MAF
Overhaul replaced			Overhaul replaced			Overhaul replaced
Mile Check Engine Light still on			Mile Check Engine Light still on			Mile Check Engine Light still on
due to possible sensor and cannot			due to possible sensor and cannot			due to possible sensor and cannot
give not to go now			give not to go now			give not to go now
Ad Cars 645.93			Ad Cars 645.93			Ad Cars 645.93
TOTAL RECEIPTS			TOTAL RECEIPTS			TOTAL RECEIPTS
569.93			569.93			569.93

45

BUTLER'S AUTOMOTIVE
Clutch & Front End Repairs
General Maintenance
1848 Edgfield Street
GREENWOOD, SC 29646
(884) 227-1272

47

242

[illegible]

ERG2-020.1 0001

KURULUŞ İNCELEMELERİ



BOLES ENTERPRISES
826 East Cambridge Avenue
GREENWOOD, SOUTH CAROLINA 29645
(864) 223-4426 (864) 223-5211

NAME _____

ADDRESS

014267

DATE		CITY		STATE		ZIP CODE		PHONE	
3/26/90									
YEAR & MAKE OF CAR TYPE OR MODEL		SERIAL NO. / VIN		MOTOR NO.		WARRANTY		WRITTEN BY	
Lincoln									
LICENSE NO.		TITLE		SALES TAX		REGISTRATION		TOTAL	
498LRF									
DESCRIPTION OF WORK								AMOUNT	
Walker Ser								95.00	
Storage today								14.00	
SEE BACK FOR ADDITIONAL PARTS		TOTAL PARTS ▶		TOTAL ACCESSORIES ▶		TOTAL ▶		TOTAL ▶	
ACCESSORIES - TUNES AND TONES									
TOTAL ACCESSORIES ▶									
ESTIMATED AVE # OF PARTS		AUTHORIZED BY		TOTAL INVOICE ▶		TOTAL ▶		TOTAL ▶	
217-6637									

100-2-622, I 1002

Dr. W. J.

Incident Report
26 March 02 Tues

The following is the order of events surrounding the car fires at our facility tonight:

1840 Tara Price called me stating there was a car on fire in the rear parking lot:
6:40
1841 I called [REDACTED] asking him to meet me out back
1842 I arrived at the rear shipping door observed the fire and immediately called 911
1843 Dispatch went out
1853 2 units from the Sheriff's department arrive
1900 First fire unit arrived
1901 Pumper unit arrives
1948 All fires were out and vehicles were being towed away by Boles Service Station and Winks Towing.

The Towing services cleaned up most of the debris and I had Jesse Lowder from maintenance put out orange barrels to prevent anyone from parking in those spaces until they could assessed in daylight.

I took several pictures of the damaged vehicles. They are on Don Westbrook's desk.



South Carolina Fire Incident Reporting System

HWY 34 Vol Fire
Fire Department

1 Delete
2 Change

A		10	FD#	INCIDENT NO.	EXP.	MO.	DAY	YEAR	DAY OF WEEK	THURSDAY	3	ALARM TIME	ARRIVAL TIME	SEARCH TIME
B		SITUATION FOUND												
C		ACTION TAKEN												
D		FIXED PROPERTY USE (Occupancy) (page 18)												
E		IGNITION FACTOR (page 57)												
F		CORRECT ADDRESS (Up to a maximum of 21 characters)												
G		OCCUPANT NAME (LAST, FIRST, MI)												
H		OWNER NAME (LAST, FIRST, MI)												
I		METHOD OF ALARM												
J		NO. FIRE PERSONNEL RESPONDED												
K		NO. ENGINES RESPONDED												
L		NO. AERIAL APPARATUS RESPONDED												
M		NO. OTHER VEHICLES RESPONDED												
N		NUMBER OF INJURIES												
O		NUMBER OF FATALITIES												
P		FIRE SERVICE												
Q		OTHER												
R		COMPLEX (page 58)												
S		MOBILE PROPERTY TYPE (page 57)												
T		AREA OF ORIGIN (page 61)												
U		EQUIPMENT INVOLVED IN ORIGIN (page 64)												
V		FORM OF HEAT HEAVY (page 69)												
W		TYPE OF MATERIAL BURNED (page 73)												
X		FORM OF MATERIAL BURNED (page 74)												
Y		METHOD OF EXTINGUISHMENT												
Z		LEVEL OF ORIGIN												
AA		ESTIMATED TOTAL LOSS - CONTENTS AND STRUCTURE (Dollars Only)												
AB		NUMBER OF STORIES												
AC		CONSTRUCTION TYPE												
AD		EXTENT OF DAMAGE												
AE		DETECTOR PERFORMANCE												
AF		SPRINKLER PERFORMANCE												

COMPLETE FOR ALL INCIDENTS

COMPLETE FOR ALL INCIDENTS

COMPLETE FOR ALL INCIDENTS

1-800-255-2262

COMPLETE FOR ALL INCIDENTS

1 - laundry room 41 - storage room 42 - closet	76 - roof/wall assembly 77 - roof/wall assembly 78 - wall	84 - window/door 85 - window 86 - door 87 - other (list no.)	18 - basement floor/ceiling 19 - portable h.r. unit 20 - chimney 21 - elevator	44 - sign, poster 45 - weight, receptacle, outlet 46 - lighting fixture 47 - cord, plug	87 - refrigerator 88 - vehicle parts 89 - no equip. involved 90 - other
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FORM OF HEAT/IGNITION (page 69) 11 - flame gas fuel equip. 12 - heat liquid fuel equip. 13 - heat solid fuel equip. 22 - short from damage 23 - short worn insulation 24 - unknown short 31 - cigarette 41 - torch 42 - match 43 - open fire 44 - leak fire 51 - friction 52 - hot object 53 - rubbing 70 - lightning 81 - oven/dryer heat 82 - radiator heat - other	TYPE OF MATERIAL IGNITED (page 72) 11 - natural gas 22 - gasoline 23 - kerosene/coal oil, alcohol 31 - oil, grease 34 - plastic, tar, asphalt 35 - paint, varnish 41 - polyurethane 42 - polyester 51 - rubber 54 - grass, leaves, hay 55 - coal, briquettes 57 - wood 61 - growing wood 62 - finished lumber 64 - woodchip 65 - plywood 67 - paper 71 - man-made fabric 80 - asphalt material - other	FORM OF MATERIAL IGNITED (page 74) 11 - adhesive seal 12 - interior wall 13 - tile, curtain, rug 14 - interior wall 21 - uphol. furniture 22 - mattress 23 - bedding 24 - wearing apparel 25 - curtain 41 - newspaper 42 - electric wire 43 - fan 44 - fuel 74 - grass, brush, forest 75 - trash 76 - cooking materials 84 - auto/tire - other
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METHOD OF EXTINGUISHMENT 1 - self extinguished 2 - water - shift side 3 - portable extinguisher 4 - automatic extinguishing system 5 - pre-connected hose/tank only 6 - pre-connected hydrant/drain/sprinkler 7 - hand laid hose/hydrant/drain/sprinkler 8 - master alarm system 9 - not classified 0 - undetermined	LEVEL OF ORIGIN 1 - grade, ground level 2 - second story 3 - third story 4 - fourth story 5 - (five)th story 6 - seventh story or above 7 - others in flight 8 - basement 9 - undetermined	ESTIMATED TOTAL LOSS - CONTENTS AND STRUCTURE (Dollars Only)
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NUMBER OF STORIES 1 <input type="checkbox"/> 1 story 2 <input type="checkbox"/> 2 story 3 <input type="checkbox"/> 3 to 4 stories 4 <input type="checkbox"/> 5 to 6 stories 5 <input type="checkbox"/> 7 to 12 stories 6 <input type="checkbox"/> 13 to 24 stories 7 <input type="checkbox"/> 25 to 49 stories 8 <input type="checkbox"/> 50 stories or more 9 <input type="checkbox"/> Number of stories undetermined or not reported.	CONSTRUCTION TYPE 1 <input type="checkbox"/> Fire resistance 2 <input type="checkbox"/> Heavy timber 3 <input type="checkbox"/> Protected noncombustible 4 <input type="checkbox"/> Unprotected noncombustible 5 <input type="checkbox"/> Protected ordinary 6 <input type="checkbox"/> Unprotected ordinary 7 <input type="checkbox"/> Protected wood frame 8 <input type="checkbox"/> Unprotected wood frame 9 <input type="checkbox"/> Not classified above 0 <input type="checkbox"/> Undetermined or not reported
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EXTENT OF DAMAGE 1 <input type="checkbox"/> Confined to object of origin 2 <input type="checkbox"/> Confined to part of room or area of origin 3 <input type="checkbox"/> Confined to room of origin 4 <input type="checkbox"/> Confined to fire-rated comp. of origin 5 <input type="checkbox"/> Confined to floor of origin 6 <input type="checkbox"/> Confined to structure of origin 7 <input type="checkbox"/> Beyond structure of origin 8 <input type="checkbox"/> Not damage of this type (N/A)	DETECTOR PERFORMANCE 1 <input type="checkbox"/> Det. in room or space of fire origin - oper. 2 <input type="checkbox"/> Det. not in rm. or space of fire origin - oper. 3 <input type="checkbox"/> Det. in rm. or space of origin - no oper. 4 <input type="checkbox"/> Det. not in rm. or space of origin - no oper. 5 <input type="checkbox"/> Det. in rm. or space of fire origin but fire too small to operate. 6 <input type="checkbox"/> Not classified above 7 <input type="checkbox"/> Undetermined or not reported 8 <input type="checkbox"/> No detector present (N/A)	SPRINKLER PERFORMANCE 1 <input type="checkbox"/> Equipment operated 2 <input type="checkbox"/> Equipment should have oper. - did not 3 <input type="checkbox"/> Equipment oper. but fire too small to oper. 4 <input type="checkbox"/> Not classified above 5 <input type="checkbox"/> Undetermined or not reported 6 <input type="checkbox"/> No equipment present (N/A)
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TYPE OF MATERIAL GENERATING MOST SMOKE (page 97) IF SMOKE SPREAD BEYOND ROOM OF ORIGIN	AVENUE OF SMOKE TRAVEL 1 <input type="checkbox"/> Air handling duct 2 <input type="checkbox"/> Chimney 3 <input type="checkbox"/> Window unit 4 <input type="checkbox"/> Ceiling 5 <input type="checkbox"/> Opening in construction 6 <input type="checkbox"/> Utility opening in duct 7 <input type="checkbox"/> Utility opening in floor 8 <input type="checkbox"/> Not classified above 9 <input type="checkbox"/> Undetermined or not rep. 0 <input type="checkbox"/> No source of smoke (N/A)
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FORM OF MATERIAL GENERATING MOST SMOKE (page 101)
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30 IF MOBILE PROPERTY YEAR: 93 MAKE: Gen MODEL: Trans SERIAL NO.: LICENSE NO.: 498-618	40 IF EQUIPMENT INVOLVED IN IGNITION YEAR: MAKE: MODEL: SERIAL NO.:
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Version IV
8/84

U

MEMBER MAKING REPORT

Emerg L Shenal

DATE

3/24/02

AFFIDAVIT OF VEHICLE FIRE

(All Questions Must Be Answered)

Claim Number: [REDACTED] Name of Insured: [REDACTED]
 Address: [REDACTED] Abbeville, SC [REDACTED]
 Home Phone: [REDACTED] Bus. Phone: [REDACTED] Occupation: Machine Operator
 Name/Address of Employer: [REDACTED] Greenwood SC 29646
 Driver's License #: [REDACTED] Social Security #: [REDACTED] Marital Status: Single

Date Of Fire: 3-26 Time: 6:40 AM: [REDACTED] PM: [REDACTED] Location: [REDACTED]
 Was the vehicle occupied immediately prior to the fire? Yes [] No [X] Was the vehicle locked? Yes [X] No []
 Were the windows rolled up tightly? Yes [X] No []
 What was the temperature outside when the fire occurred? 70° What color was the smoke? Bluish-black
 In what area of the car did the fire start? Under the hood.

If Occupied (Vehicle was not occupied)
 Did you smell or see the fire first? Which side of the vehicle did you exit from?
 Did you leave the door open? Yes [] No [X] Did you remove the key from the ignition? Yes [] No [X]
 Did you raise the hood? Yes [] No [X] Was the gas cap removed? Yes [] No [X]
 How long did you remain at the scene? 24 How did you get home? [REDACTED]
 Name/Address of Witness(es) [REDACTED]

Was the fire reported to the police? Yes [X] No [] Date: 3-26 Time: 4:11 AM [] PM [X] By Whom? Reggie Rucker
 Name/Address of Fire Dept: HWY 34 Volunteer Fire Dept Fall ninety six Hwy Greenwood SC.
 Did they make a report? Yes [X] No [] Telephone Number: (804) 227-3432 29146
 If repairable, do you wish to have the vehicle repaired? Yes [X] No []

VEHICLE EQUIPMENT (Check if vehicle had any of the following)

<input checked="" type="checkbox"/> Power Windows	<input checked="" type="checkbox"/> Tilt Wheel	<input checked="" type="checkbox"/> 4 Wheel Drive	<input checked="" type="checkbox"/> Automatic Trans	<input checked="" type="checkbox"/> 6 Cylinder
<input checked="" type="checkbox"/> Power Steering	<input checked="" type="checkbox"/> Leather Seats	<input checked="" type="checkbox"/> AM	<input checked="" type="checkbox"/> 3 Speed	<input checked="" type="checkbox"/> 8 Cylinder
<input checked="" type="checkbox"/> Power Brakes	<input checked="" type="checkbox"/> Vinyl Seats	<input checked="" type="checkbox"/> AM/FM	<input checked="" type="checkbox"/> 4 Speed	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Power Locks	<input checked="" type="checkbox"/> Velour Seats	<input checked="" type="checkbox"/> AM/FM Stereo	<input checked="" type="checkbox"/> 5 Speed	
<input checked="" type="checkbox"/> Power Seats	<input checked="" type="checkbox"/> Mag Wheels	<input checked="" type="checkbox"/> AM/FM Stereo Tape	<input checked="" type="checkbox"/> Customized (self)	
<input checked="" type="checkbox"/> Cruise Control	<input checked="" type="checkbox"/> T-top/Sun roof	<input checked="" type="checkbox"/> Customized (self)	<input checked="" type="checkbox"/> Customized factory	
<input checked="" type="checkbox"/> Air Conditioning	<input checked="" type="checkbox"/> Vinyl Roof	<input checked="" type="checkbox"/> Custom factory	<input checked="" type="checkbox"/> 4 Cylinder	

VEHICLE CONDITION

(Fair F, Good G, Excellent E) Paint G Transmission E
 Engine E Body G

OTHER DISTINGUISHING FEATURES

(Dents, decals, trailer hitch, interior)
 Name/Address of Service Station Garage: Mc Lube 214 Bypass 72 NW, Greenwood, SC
 Who performs routine maintenance service? Attendant Date last serviced: The month of March (can't remember date)
 Who performs State MV Inspection? We don't have inspection Date last inspected:

Date car purchased: 11-14-99 Used: [X] Purchase Price: \$4,000

Trade-In Car: Allowance \$

Seller Dealer/Individual (include address): Vince Coates 107 Westwood Rd. Abbeville SC. 29620

How did you learn car was for sale? Advertisement

Mileage at time of purchase: 11,000 Mileage at time of loss (fire): 153,700

How was car paid for? Cash: [X] If financed, name and address of Finance Company:

Carolina Employees Credit Union 218 Birchtree Dr. Greenwood SC. 29646

Account #: 251408108-1 Balance Due: \$215,000 Loan Terms: 24 Months at 5%

Initials of Insured [REDACTED]

Date

4-3-02

Signature of Notary

Date

4-3-2002

Date of last loan payment made: 3-15-00 Is account past due? Yes [] No [☒]
How long? Are keys in your possession? Yes [☒] No []

Do you have any other auto insurance? Yes [] No [☒] If yes, Policy #:
Name of Insurance Company:

James W. [Signature]
I swear that the information contained in this above statement is complete, true and correct under the penalty of perjury.

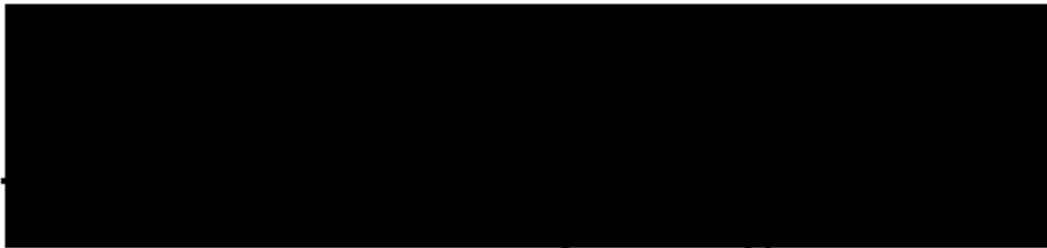

Date 4-3-02 Signature of Insured 

State of Greenwood SC
SS

County of Greenwood

Subscribed and sworn to in my presence this 4-3- day of April, 2002

Note:


Greenwood SC. 

Select Activity Logs

Claim Key: [REDACTED]
Policyholder: [REDACTED]
Claimant: N/A

Requester: ADAMSR1
Print Date: January 28, 2003
Print Time: 11:38 AM

Date: 2003-01-28 Time: 09:02:44
Creator: SPRULT
Assignee: ADAMSR1
Cov:
Claimant:

RS TRANSCRIPTION FOR [REDACTED]

File Name: rmc18864.dd
Insured: [REDACTED]
Claim No: [REDACTED]
Person Giving Statement: [REDACTED]
Relationship to Accident: Policyholder
Date Taken: 4/2/02
Date of Loss: 3/26/02
Interviewer: Andrew Burt
Cov: FTC
CaseID: AdamSR1

COMMENT: Inaudibles due to low volume.

Q: This is Andrew Burt [phonetic] speaking. Im speaking with [REDACTED] Were discussing an incident that occurred on March 26th, 2002. Today's date is April 2nd, 2002, at approximately ten minutes till 4:00 p.m. And [REDACTED] do you realize that I am recording this interview?

A: Yes, sir.

Q: Do I have your permission to continue with the recording?

A: Yes, sir.

Q: Okay. And tell me basically in your own words, what he-, what happened with the car, and then Ill just kind of direct you with questions as I have them?

A: Okay. Well I, um, took it to the shop, uh, the, I think the Monday before the incident happened. It was Monday or Tuesday, I cant remember. And I got it out Thursday. And so Tuesday, I got to work I think about 5:25 or something like that. And I was inside working. So [inaudible] I saw some employees running towards the back door. And one of my coworkers came up to me and told me there was a white Cadillac on fire and I might want to go look. So I mean, uh, well, Im thinking, okay, I have a Lincoln. But that was probably like the only white car that was back there at the time. And so I ran and looked and I got to the door, and I saw the flames. And it was my car.

But, uh, my, uh, supervisor wouldn't let me outside. She didn't let anybody outside. Because she said the car [inaudible] or whatever.

Q: Okay. Um, what did [inaudible] I'm looking at a calendar. Um, the date of loss we have listed on, uh, Tuesday, the 26th?

A: [Inaudible].

Q: You got it out, out of the shop on the previous Thursday?

A: Yeah, the Thursday before that.

Q: That would have been on 3/21? Um, and when you got it out, uh, what, what was it in the shop for?

A: [Inaudible] know much about cars. They were doing a lot of work on it. I think it's because my engine light was coming on. And so when I got there, uh, [inaudible] well, I told them that Thursday, if it costs over \$300.00 then don't fix it, just call and let me know first. So she said, uh, they had got up to \$300.00 worth of work done, and it was going to cost me more. And I was like, well, go ahead and do it. Then I told them to get up to \$600.00. Because I'm trying to budget my money and everything. And I was [inaudible] thinking about how much I wanted to spend.

Q: Uh-huh.

A: But, uh, she called back and said that they had to finish putting, I think some kind of sensor or something on it. And it wasn't going to cost that much over \$600.00. But the total I got came to \$645.93. And I have a copy of the receipt.

Q: Okay.

A: I've indicated, well, you'll have to see it for yourself [inaudible].

Q: Okay.

A: [Inaudible].

Q: Um, and this is at Butler Automotive, is that right?

A: Yes, sir.

Q: In Greenwood?

A: Uh-huh.

Q: Okay. And once you got it out of the shop, did it, did you have anymore problems with it before the fire happened?

A: Yeah, the engine light did come on again, but it went right back off. So I didn't think it was nothing serious. I mean the car was running fine and everything, seemed like. And that was it that I know of. Because I got to work that day.

Q: Okay. And do you, do you know what day the engine light came on? Was it that Thursday, or not?

A: Well, di-, yeah, it did come on that Thursday, kind of like before I got to work. But, you know, like I said, it went back off.

Q: Okay. All right. And ab-about how long after you had parked it did the, did you guys notice that it was on fire, about, about what time did you park it there and about what time did you realize it was on fire?

A: It was about si-, no, five, I'd say about 5:20-5:25 when I parked it. Because I have to be at work at 5:30. And I'm thinking&

Q: That was in the evening?

A: Yeah.

Q: 5:30 p.m.?

A: Yeah, p.m.

Q: Okay.

A: Um, probably about 6 o'clock or, I, I know it was after 6:00.

Q: Okay.

A: When they came and told me, if I'm not mistaken, or probably something till 7:00. Maybe between, I'd say 6:20 and 7 o'clock. I don't remember the exact time.

Q: Okay.

A: [Inaudible].

Q: Was the car locked up?

A: Yeah.

Q: And did you, do you still have the keys to it?

A: Yes, sir.

Q: Uh, the ignition was not on, right?

A: No.

Q: Okay. And how long have you owned this car?

A: Um, since 11/14, 2000.

Q: And do you still have a lien with Carolina Employees&?

A: Yes, I do.

Q: Or [inaudible]?

A: Yeah, I do.

Q: And do you know about what you owe on it still?

A: I think its, uh, \$2,151.00 [unclear].

Q: And are your payments up to date?

A: Yes, sir, they are.

Q: And who-where are you employed, where, where did this happen?

A: [REDACTED]

Q: Ethen?

A: [REDACTED]

Q: [REDACTED]

A: Yes, sir.

Q: And do you happen to have their address right there? If not, dont worry about it, but if you do Ill take it?

A: Um, yes I do. Okay. [REDACTED]

Q: Uh-huh.

A: [REDACTED] thats Greenwood, South Carolina [REDACTED]

Q: Okay. And what do you do there?

A: Im, um, a machine operator.

Q: Okay. And have you had any other, um, mechanical problems or, or repair work or anything done with the car si-since youve had it, other than just routine maintenance for it?

A: Uh, the, um, Butler Automotive has always done the work on my car. So, uh, before then, I think last year sometime at the beginning of the year, I had some stuff did [unclear] with the fuel pump. I think they, uh, they did some work on it, I cant remember exactly what it is. And they, um, did some wiring work to my steering wheel, Im thinking a few months ago.

Q: Okay. And you do have, you said you do have a re-, a receipt for this recent work that was done?

A: Yes, sir.

Q: Do you still have the [inaudible] maintenance records for any of the past stuff that was done?

A: Um, no, I dont.

Q: Okay. All right. And, um, Im showing this was on a 93 Lincoln Town Car?

A: Yes, sir.

Q: And do you recall how many miles were on the odometer?

A: Well, I can estimate [unclear] [inaudible]. Uh, I'd say about 157,000.

Q: Okay.

A: No, I'm sorry, 153,700, I'm sorry.

Q: Okay. And it had, it had leather seats, right?

A: Yes, sir.

Q: And power and all that stuff?

A: Uh-huh.

Q: Did the radio come with the car or did you have a, um, after market stereo system?

A: Well, the radio came with it. But, uh, [inaudible] that weekend, I bought a, um, another factory [inaudible] radio [inaudible] because my tape player wasn't working. I mean the, the tape player that came with the car wasn't working. So I went and got another factory tape player.

Q: And, and did you install that or did someone else?

A: Yes, sir.

Q: You did?

A: Uh-huh.

Q: Okay. All right. And have you understood all the questions that I've asked?

A: Yes, sir.

Q: And have all of your answers been true and correct to the best of your knowledge?

A: Yes, sir.

Q: Okay. I'm going to turn the recorder off at this time.

[End of Recorded Statement.]

Consulting Service

Transportation Technology

1184 Wind Hill Lane

Marietta, Ga. 30064

Telephone / Fax (770) 426-6173

or Toll Free (877) 328-3385

www.vehicleinvestigator.com

CASE 22060

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1.2 Subject

1.3 Location

1.4 Purpose

1.5 Date of Inspection

2.0 PARTICIPATING PERSONNEL

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4.0 CONCLUSIONS

5.0 PHOTOGRAPHS

Consulting Service

Transportation Technology

1184 Wind Hill Lane

Marietta, Ga. 30084

Telephone / Fax (770) 426-6173

or Toll Free (877) 328-3385

www.vehicleinvestigator.com

1.0 ASSIGNMENT

1.1 Client:



1.2 Subject:

1993 Lincoln Town Car

Ser# 1LNLM81W2PY710385

1.3 Location:

SADISCO SALVAGE^{id}
PHONE #
803-356-4810

1.4 Purpose:

1.5 Date of Inspection:

2.0 Participating Parties:

2.1 Investigator:

Transportation Technology

Consulting Service

Transportation Technology

1184 Wind Hill Lane

Marietta, Ga. 30064

Telephone / Fax (770) 426-8173

or Toll Free (877) 326-3365

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3.0 EXAMINATION OF VEHICLE

3.1 Pursuant to a request from [REDACTED] the above mentioned vehicle was inspected while it was situated on a parking stall at Sadleco Salvage Disposal in Lexington, SC (Photo #1). Proceeding in a clockwise direction from the front of the vehicle the exterior surfaces were photographed to document the condition of the vehicle at the time of our investigation (Photo #2, #3, #4, #5). It is our understanding that the vehicle was parked and unattended for approximately 1½ hours at which time the fire was discovered. It is also our understanding that the vehicle was parked at the insured's work place adjacent to two other parked vehicles, which also sustained fire damage. A portion of the vehicle identification number was recorded from a label on the driver's side lower windshield opening and the balance of the identification number was recorded from a label on the driver's side front door (Photo #6, #7). The fire spread from the engine compartment into the interior. The fire damaged the front seats in both positions (Photo #8) and concluded in the rear seat area, where the fire melted the upper layer of upholstery.

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In the seat rest and damaged some of the seat back cushioning (Photo #9). The dashboard sustained fire damage, which made it impossible to record any mileage from the odometer (Photo #10). Both front tires were involved and consumed a large portion of the rubber material (Photo #11, #12). Additionally, the inboard sides of both wheel rims were partially melted (Photo #13, #14). Heat development in the interior of the vehicle caused a section of the roof panel to buckle (Photo #15).

3.2 The hood panel was made from aluminum and most of the panel melted during the fire, thereby exposing the engine (Photo #16). Additionally, most of the plastic and rubber components inside of the engine compartment melted. The fire progressed into the interior through openings in the firewall (Photo #17, #18). Most of the radiator and air conditioning condenser, which are ordinarily mounted at the front of the engine compartment, had melted (Photo #19). Remains of the battery were found stacked on top of the air intake manifold (Photo #20). The fuse panel, which is ordinarily mounted on the passenger's side of the engine compartment

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sustained extensive fire damage (Photo #21). The status of the fuses located inside of the engine compartment fuse box could not be determined. The heaviest fuel load was located on the driver's side of the engine compartment; it consisted of the fuel feed and return lines, the power steering pump and the brake fluid reservoir. The power steering pump reservoir was originally located on the driver's side front inner fender. The remains of several hoses from the power steering system indicated an aggressive fire on the driver's side of the engine compartment. The flexible sections of the fuel feed and return hoses were consumed (Photo #22) as was the brake fluid reservoir (Photo #23). The passenger's side inner fender was consumed along with portions of the components, which may have been attached thereto. Remains of the air conditioning evaporator core were found at a location adjacent to the passenger's side valve cover (Photo #24). The front section of the conventionally mounted 4.6 liter engine contained a cover which isolated the timing chain assemblies. Large sections of the aluminum cover were melted (Photo #25). The driver's side valve cover was decomposed at an area adjacent to the brake booster

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(Photo #26). The passenger's side of the valve cover was mostly intact except for an area at the extreme front (Photo #27). This vehicle was equipped with the optional electronic cruise control system. The cruise control deactivation switch was at a location on the driver's side frame rail just below the brake booster (Photo #28). Oxidation patterns surrounded the frame rail directly beneath the deactivation switch. The contact portion of this switch was missing (Photo #29). The deactivation switch was removed from the portioning valves and the numbers were recorded from the body of the switch (Photo #30, #31) (F2VGBF824-AB 26-3-49). After recording the numbers from the switch body it was reinstalled on the portioning valve. The remains found on the driver's side frame rail, directly beneath the switch, were removed for inspection (Photo #32). The remains could not be identified as being part of the contact section of the switch (Photo #33).

3.3 The engine oil level dip stick was removed to determine the level of oil in the crank case. Upon inspection it was determined that a mixture of oil and water

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accumulated in the crank case. It was determined that the open areas of the valve cover and exposure to the elements coupled with the fire abatement most likely allowed water to enter the crank case (Photo #34). The transmission fluid was above the dip stick full mark and had a bright pink hue (Photo #35). The above full condition is normal for this transmission when the engine is not in operation.

3.4 The interior of the vehicle, directly below the driver's side dash, contained the in vehicle fuse box (Photo #36). The status of the individual fuses could not be determined due to the fire damage (Photo #37). It was determined that all four windows were in the up position when the fire was in progress. Remains of the glass particles found in the window frames lends credence to the position of the windows during the fire (Photo #38, #39, #40). The key lock ignition switch which was mounted on the steering column was in the "off/lock" position as found (Photo #41). The vehicle was elevated for an examination of the undercarriage. The photographs clearly show that the fire did not originate beneath the vehicle (Photos #42, #43, #44).

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4.0 CONCLUSIONS

4.1 An inspection of this vehicle showed that the fire originated on the driver's side rear of the engine compartment. This was determined by an analysis of burn patterns and fire damage. The fire progressed into the interior through openings in the firewall and concluded at the rear seat area. Heat development in the interior of the vehicle caused sections of the roof panel to buckle. The ignition key lock which was found in the "Off-Lock" position and all four of the vehicle's door windows were elevated:

4.2 The engine compartment sustained extensive fire damage. The aluminum hood, which ordinarily covers the engine compartment decomposed thereby depositing aluminum droppings inside the engine compartment. The engine oil was contaminated with water. The transmission fluid had a bright pink hue and was within anticipated limits for a filled transmission. The driver's side frame rail in the area of the cruise control deactivation switch was oxidized. The brake booster directly above the deactivation switch was also oxidized. The driver's side valve cover, above and to the side of the cruise control deactivation switch, was mostly

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decomposed. These findings show an aggressive fire on the driver's side of the engine compartment. The fire moved in a forward direction and melted the radiator and air conditioning condenser. The fire also moved across the top of the engine to the heater box, which was subsequently consumed, thereby creating the large openings on the passenger's side of the firewall. The one and one-half hour time during which the vehicle was parked would have allowed all the liquid fluid temperatures to be below self ignition temperatures. The burn patterns and fire damage on the driver's side rear of the engine compartment were consistent with a fire which originated at the cruise control deactivation switch.

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INVOICE

CASE NO. : 22050
CLIENT :
CLAIM NO. :
INSURED :

DATE : April 30, 2002

INVESTIGATION:	\$90.00	5.4	\$486.00
TRAVEL:	\$40.00	9.4	376.00
EXPENSES:			
Mileage	0.34	456	\$155.04
Film			17.25
Developing			27.28
Supplies			2.50
Postage Avg.			4.00
Other Misc.			
TOTAL EXPENSES:			206.07

FEID #382446483

Please Make Checks Payable To : Transportation Technology Inc.
Address : 1184 Wind Hill Lane
Marietta, GA 30064

Payable Upon Receipt

EP82-825.1 0052

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April 30, 2002

**Andrew Burr
Nationwide Insurance Company
P.O. Box 204537
Martinez, GA 30917**

**Re: Fire Loss 93 Lincoln Town Car
Transportation Technology No. :
Claim No#
Owner:**

22050

Dear Mr. Burr:

Enclosed are the report and invoice for subject investigation. Please contact me if you have any questions or need further assistance.

Thank you again for the opportunity to assist you.

Sincerely,

Michael E. Breanock

Michael E. Breanock

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Photograph: #1

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: 1993 Lincoln Town Car

Note: Situated on a parking stall at Sadleco Salvage Disposal in Lexington, South Carolina.

Consulting Service

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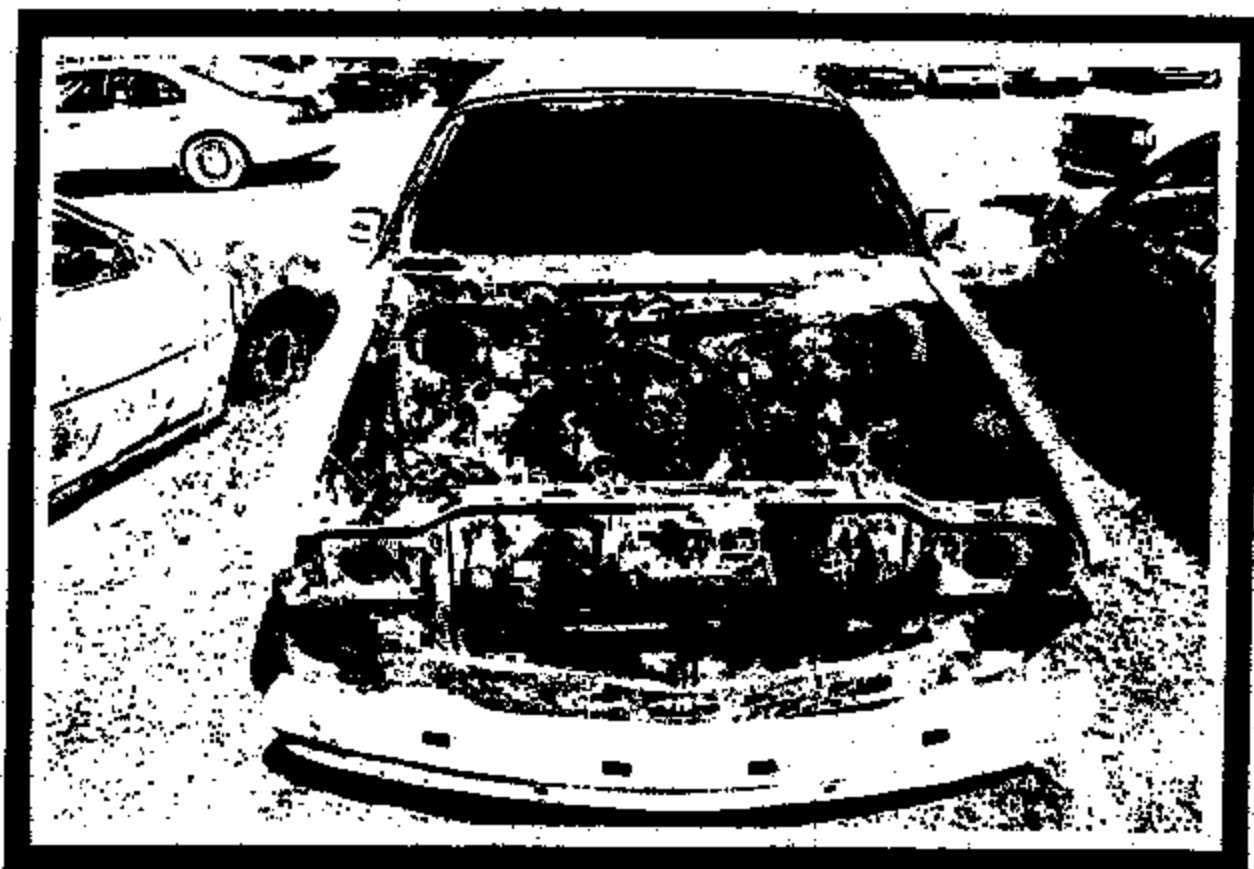
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Photograph: #2

Transportation Technology : 22090

Date Taken: April 16, 2002

Description of Subject: 1993 Lincoln Town Car

Note: Front view.

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Photograph: #3

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: 1993 Lincoln Town Car

Note: View of passenger's side.

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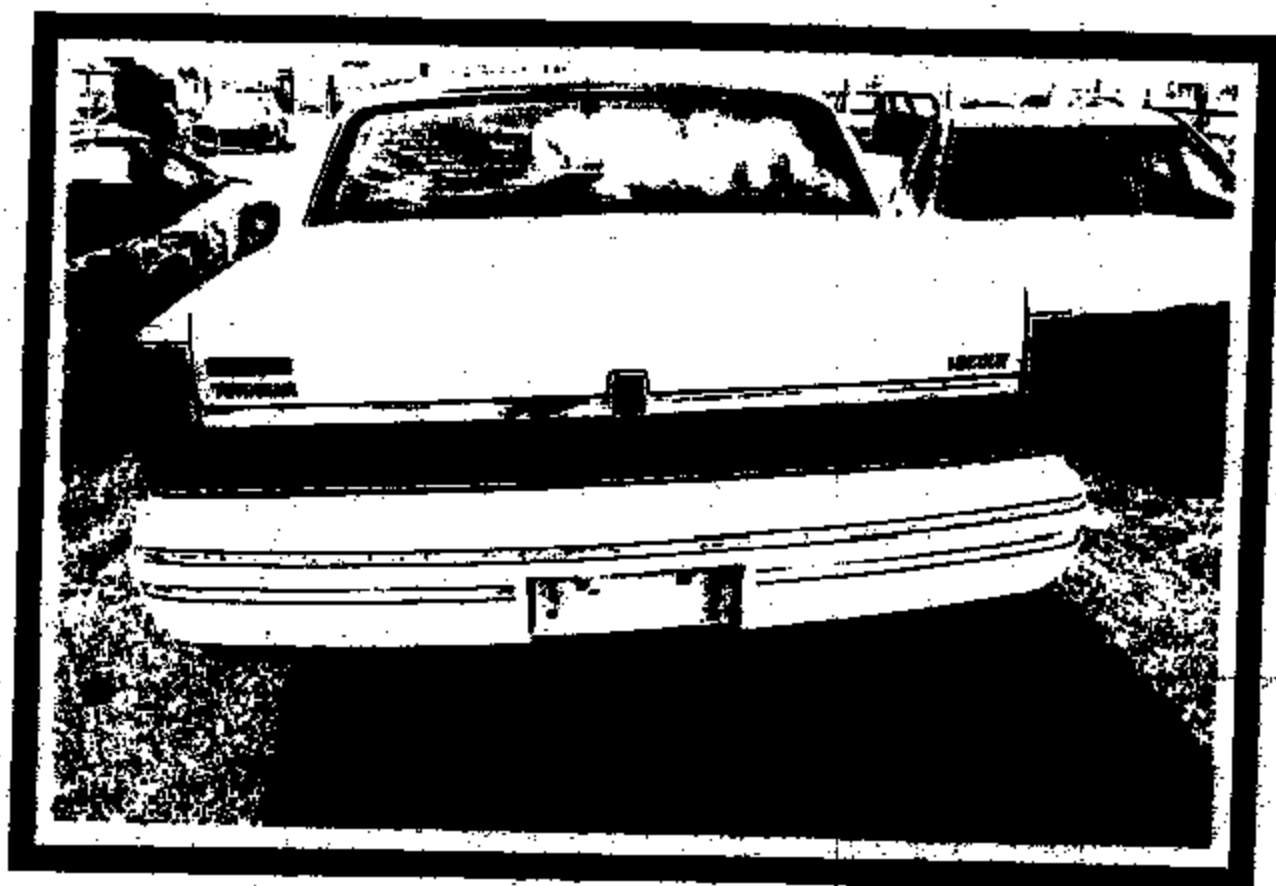
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Photograph: #4

Transportation Technology : 22050

Date Taken: April 16, 2002

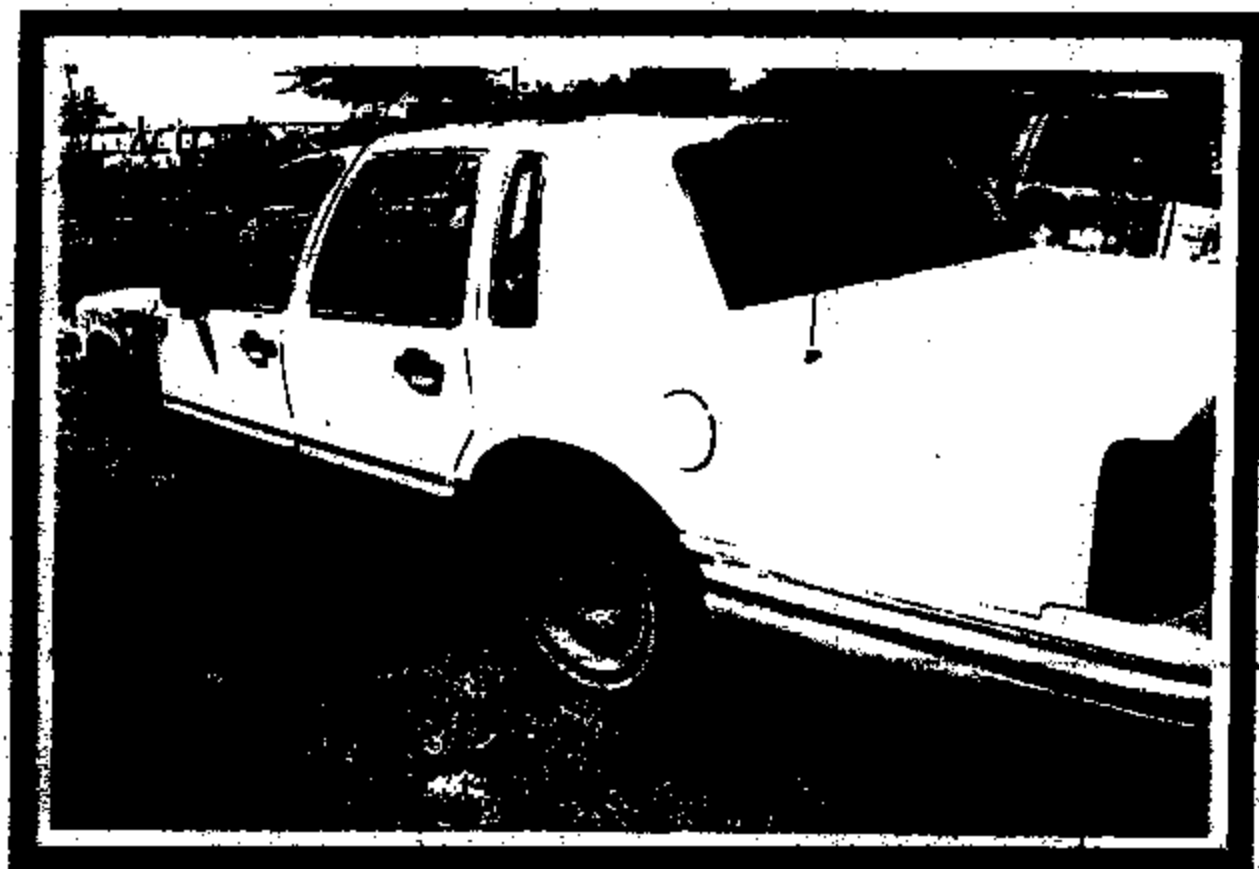
Description of Subject: 1993 Lincoln Town Car

Note: Rear view.

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Photograph: #5

Transportation Technology : 22050

Date Taken: April 16, 2002

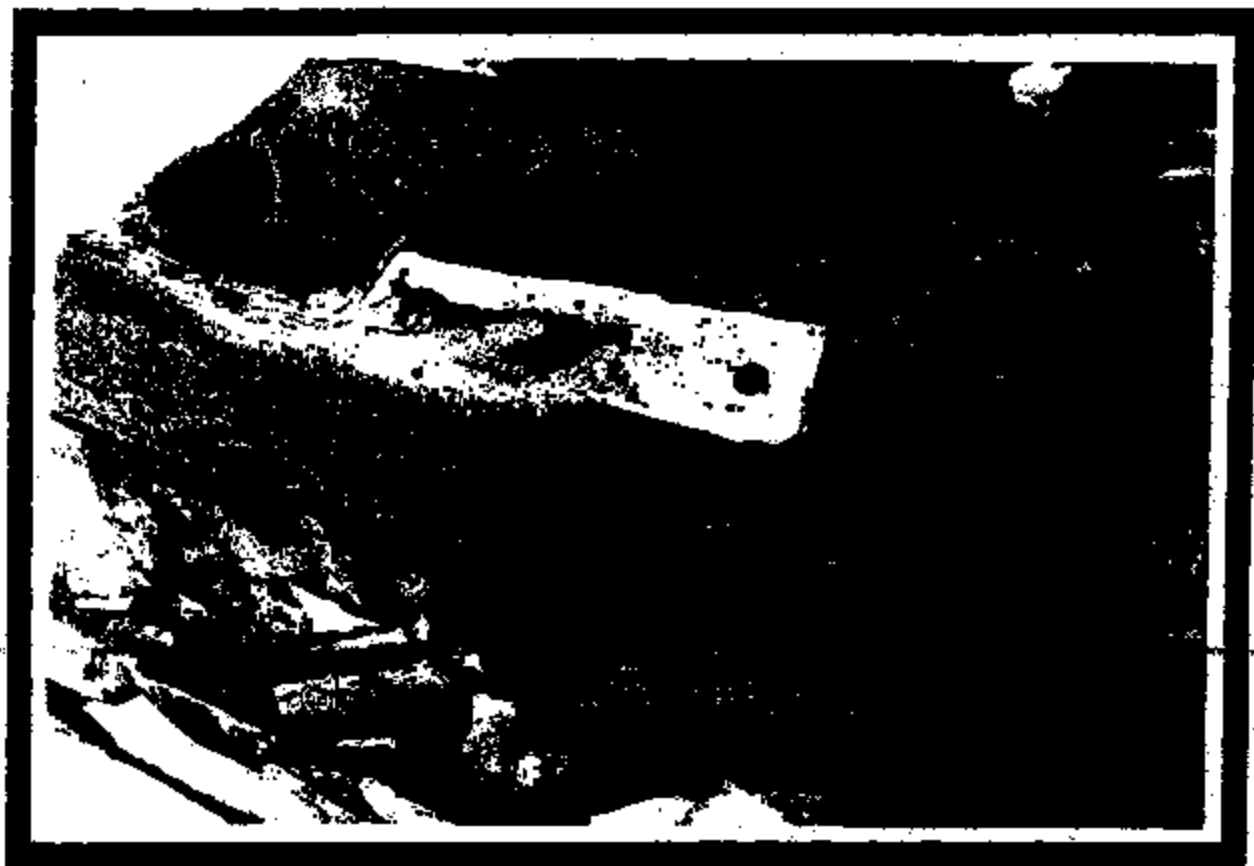
Description of Subject: 1993 Lincoln Town Car

Note: View of driver's side.

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Photograph: #6 Transportation Technology : 22050
Date Taken: April 16, 2002
Description of Subject: Driver's Side Lower Windshield Opening

Note: Location from which some of VIN was recorded.

Transportation Technology

A high-contrast, black and white photograph of a rectangular label with illegible text, mounted on a light-colored surface. The label is framed by a dashed border and contains several lines of text, some of which are obscured by heavy black shadows. The overall image is grainy and has a high level of contrast.

BRN-2-223, 1 0000

Consulting Service

Transportation Technology

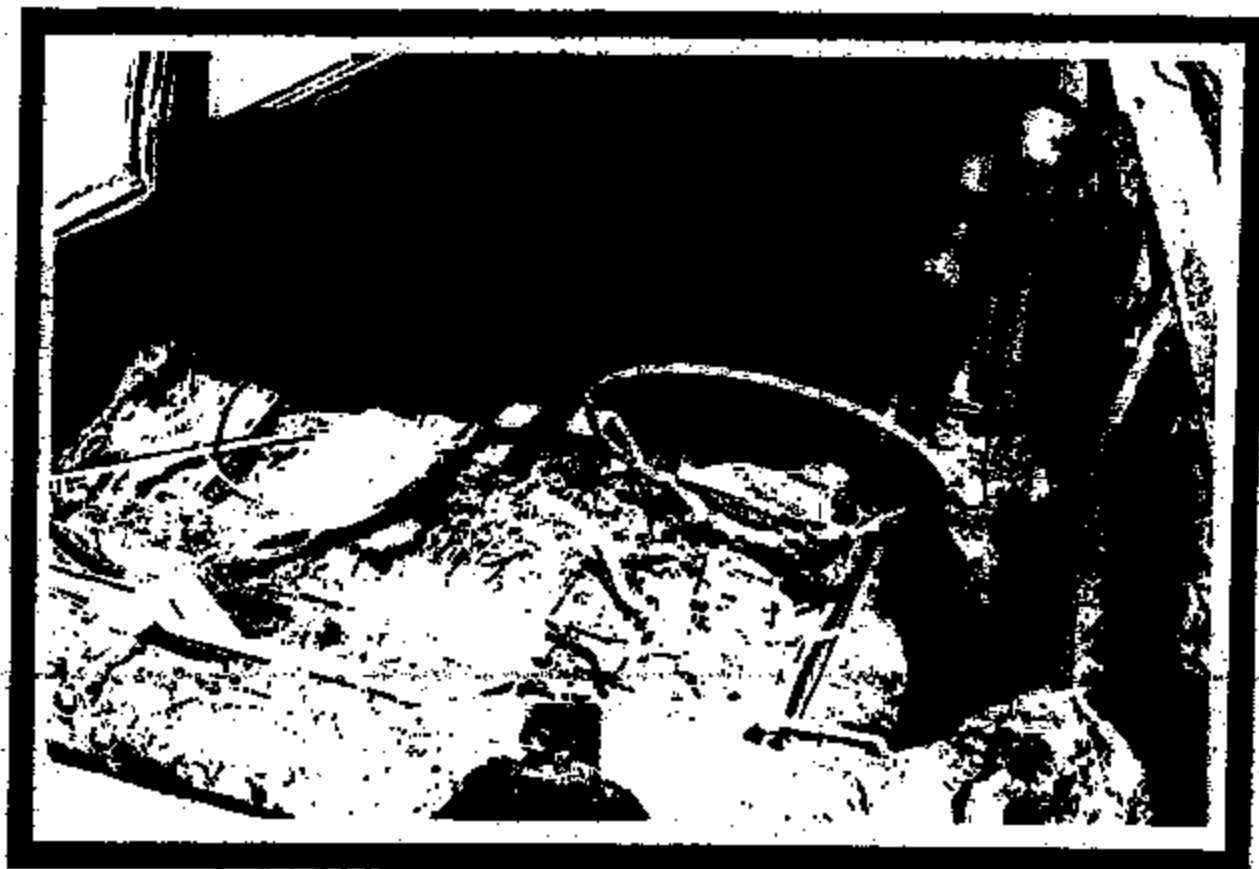
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Photograph: #8

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Interior (front through windshield opening)

Note: Fire damaged front seats.

ENR2-025.1 0051

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Photograph: #9

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Rear Seating

Note: Fire damaged area of rear seating.

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Photograph: #10

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Dash

Note: Extent of fire damage. Also note: Oxidation pattern on driver's side firewall behind dash.

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Photograph: #11

Transportation Technology : 22050

Date Taken: April 16, 2002

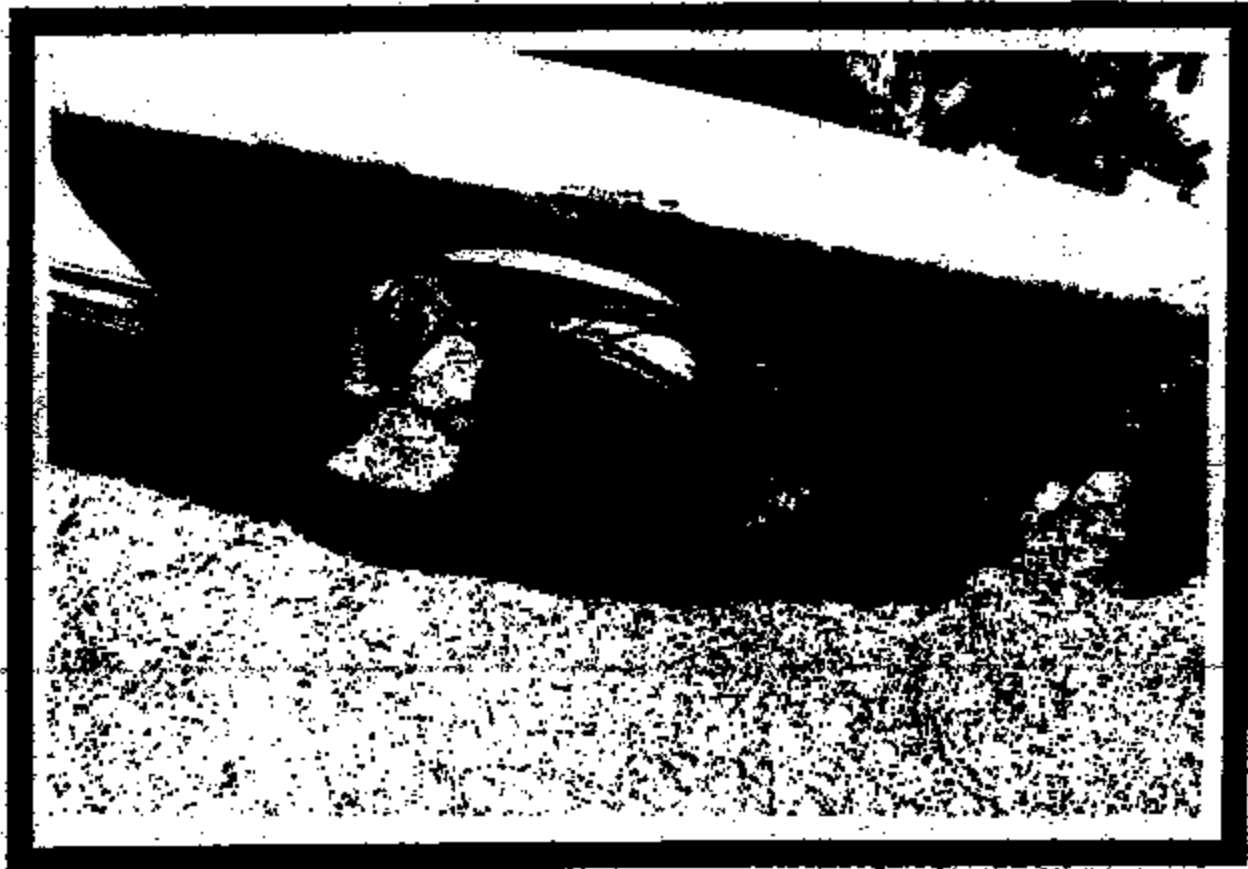
Description of Subject: Driver's Side Front Tire

Note: Remains of tire.

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Photograph: #12

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Passenger's Side Front Tire

Note: Remains of passenger's side front tire.

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Photograph: #13

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Wheel Rim (front driver's side)

Note: Melted portion of wheel rim.

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Photograph: #14

Transportation Technology : 22050

Date Taken: April 16, 2002

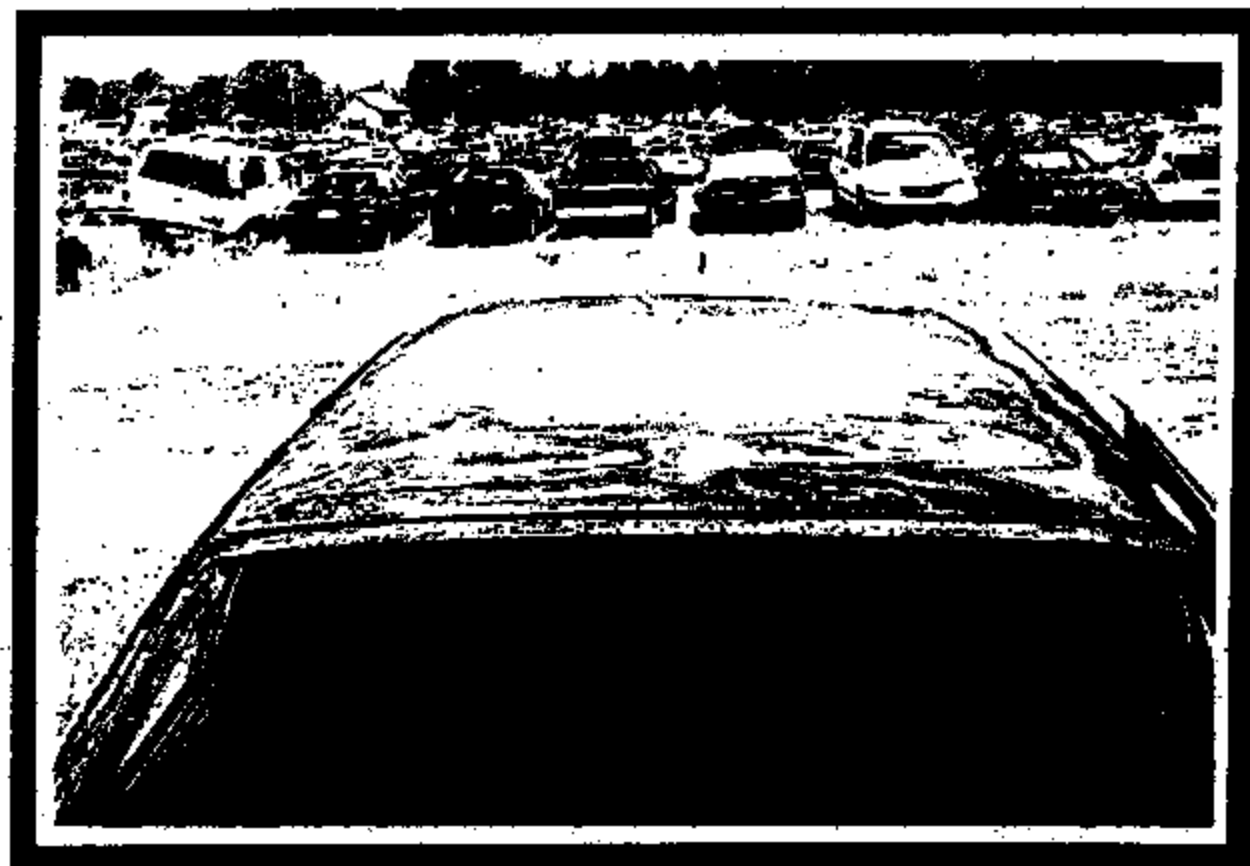
Description of Subject: Wheel Rim (front passenger's side)

Note: Melted portion of wheel rim.

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Photograph: #15

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Roof Panel

Note: Buckled section of roof panel.

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Photograph: #16

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Vehicle (front)

Note: Most of aluminum hood panel melted.

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Photograph: #17

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Firewall

Note: Openings through which fire spread into the interior.

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Photograph: #18

Transportation Technology : 22050

Date Taken: April 16, 2002

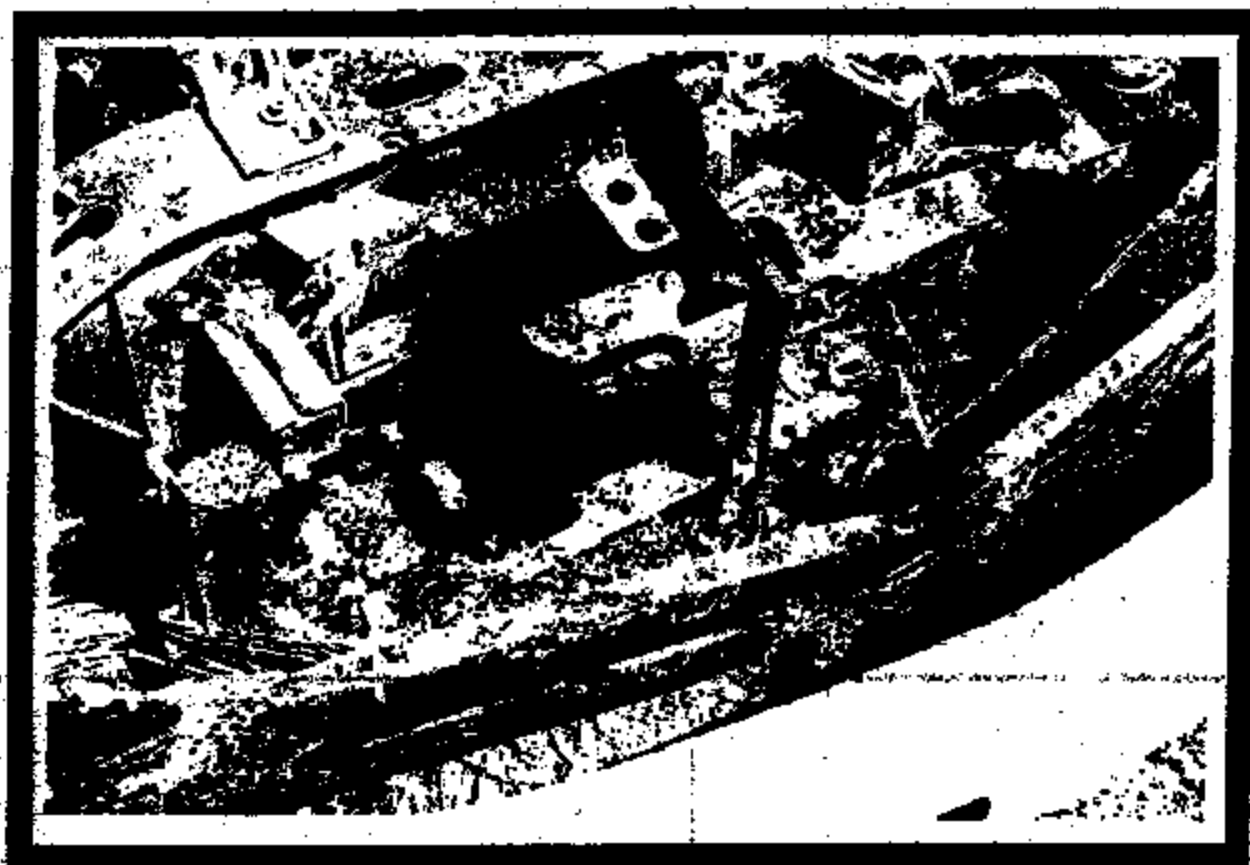
Description of Subject: Firewall (driver's side)

Note: Opening in firewall.

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Photograph: #18

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Engine Compartment (front)

Note: Remains of radiator and air conditioning condenser.

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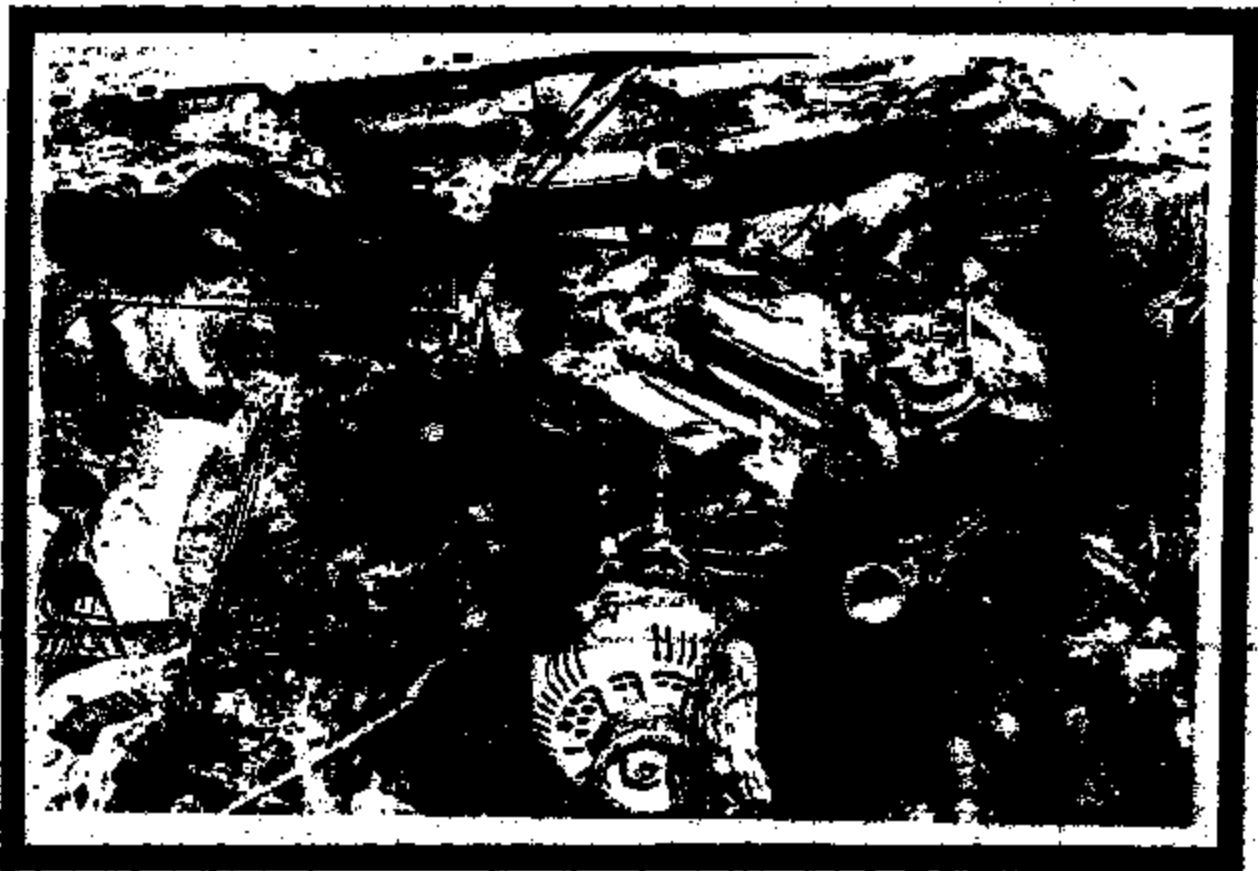
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Photograph: #20

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Engine (top)

Note: Battery remains.

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Photograph: #21

Transportation Technology : 22050

Date Taken: April 18, 2002

Description of Subject: Passenger's Side Front

Note: Engine compartment fuse box remains.

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Photograph: #22

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Engine Compartment

Notes: Fuel delivery and return lines consumed.

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Photograph: #23

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Engine Compartment (driver's side rear)

Note: Brake fluid reservoir had been consumed.

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Photograph: #24

Transportation Technology : 22050

Date Taken: April 16, 2002

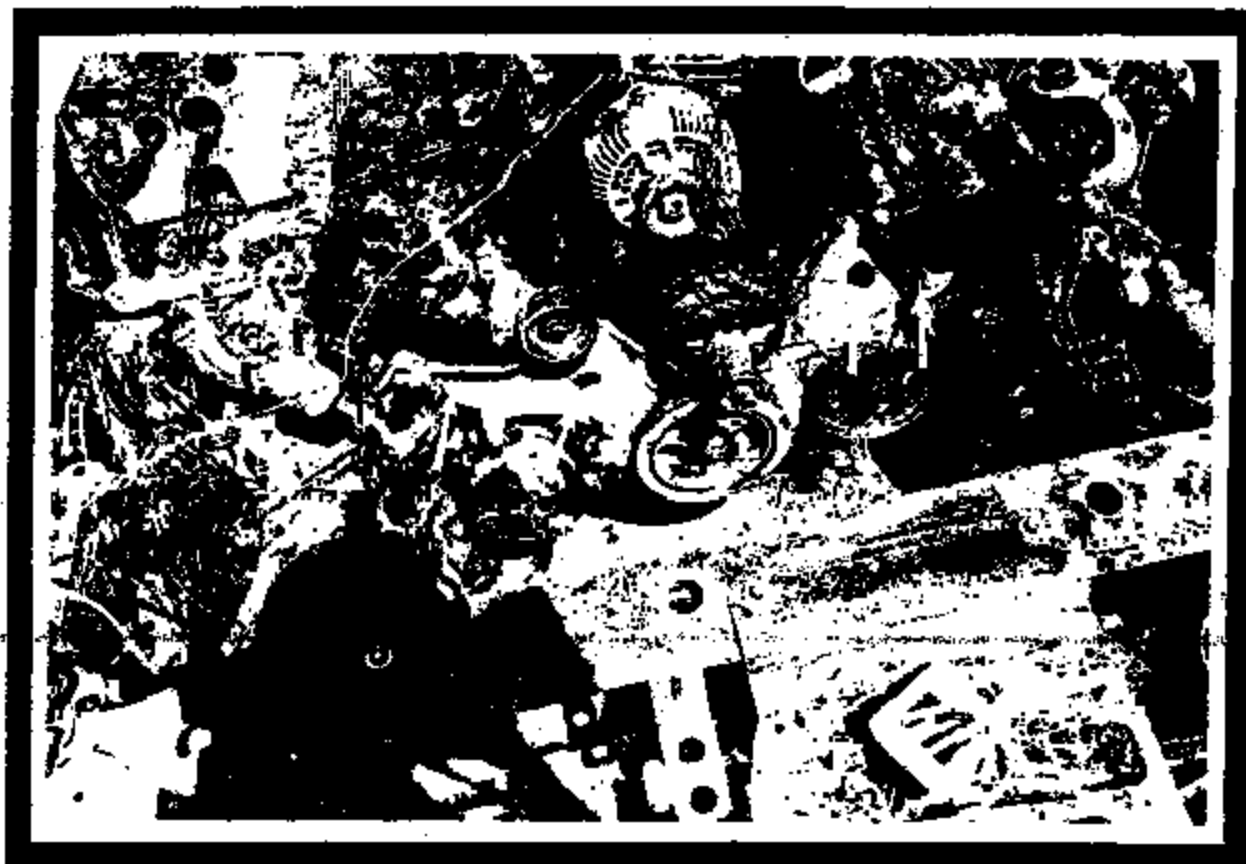
Description of Subject: Engine Compartment (passenger's side rear)

Note: Remains of the air conditioning evaporator core.

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Photograph: #25

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Engine (front)

Note: Melted sections of the timing cover.

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Photograph: #26

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Driver's Side Valve Cover

Note: Partially decomposed area.

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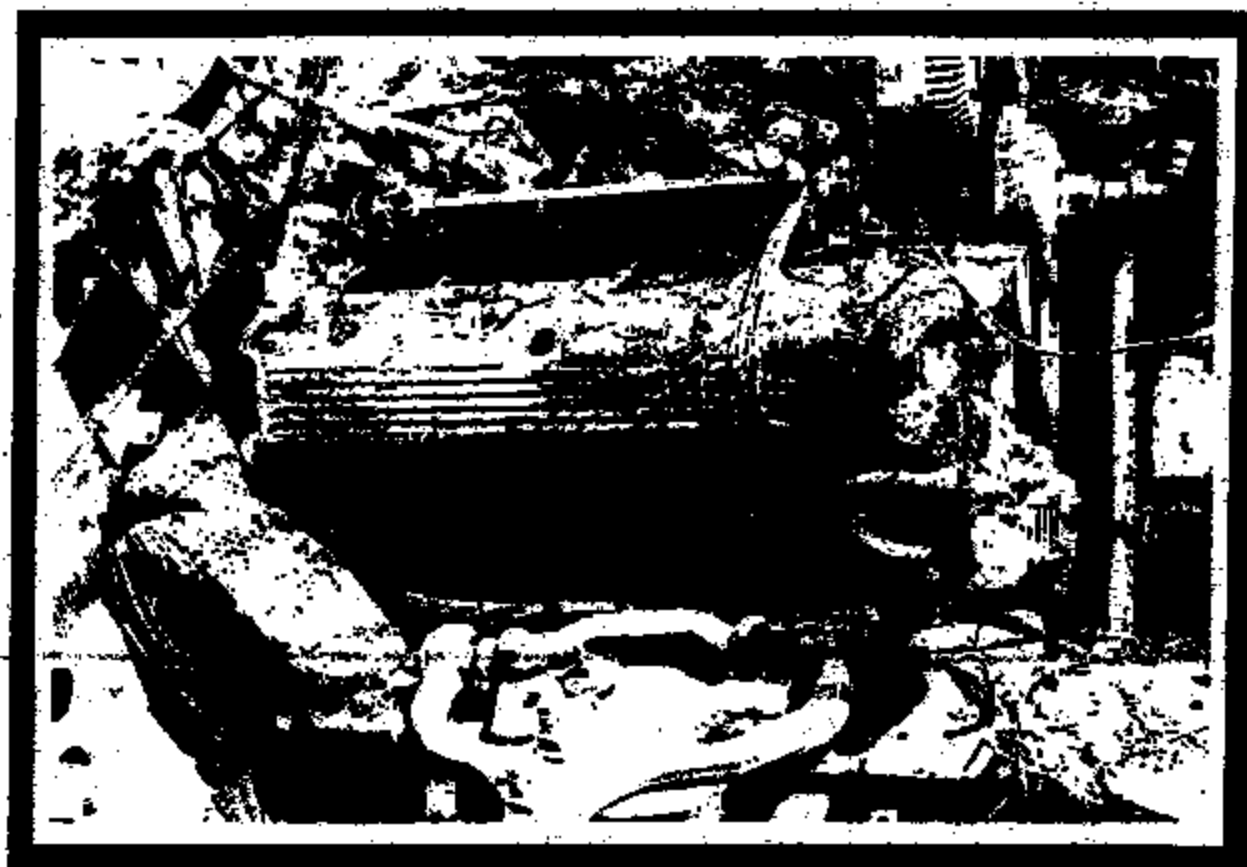
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Photograph: #27

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Passenger's Side Valve Cover

Note: Decomposed area.

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Photograph: #28

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Date Taken: April 16, 2002

Description of Subject: Engine Compartment (driver's side lower rear)

Note: Location of cruise control deactivation switch.

ENG2-625.1 0001

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Photograph: #29

Transportation Technology : 22050

Date Taken: April 18, 2002

Description of Subject: Cruise Control Deactivation Switch

Note: Missing contact portion of switch.

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Photograph: #30

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Cruise Control Deactivation Switch

Note: Numbers and letters on switch.

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Photograph: #31

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Cruise Control Deactivation Switch

Note: Additional numbers and letters on switch.

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Photograph: #32

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Date Taken: April 16, 2002

Description of Subject: Driver's Side Frame Rail

Note: Substance below deactivation switch.

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Photograph: #13

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Date Taken: April 16, 2002

Description of Subject: Substance Removed From Frame Rail

Note: Unidentified.

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Photograph: #34

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Engine Oil Level Dip Stick

Note: Overfilled with water and oil.

2002-020.1 0047

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Photograph: #35

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Transmission Oil Level Dip Stick

Note: Bright pink fluid color.

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Photograph: #36

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Dash (driver's side lower)

Note: Location of "In-car" fuse box.

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Photograph: #37

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: In-Car Fuse Box (magnified)

Note: Melted components.

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Photograph: #38

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Driver's Side

Note: Glass remains in window channel showing the glass was in the "Up" position during the fire.

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Photograph: #38

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Passenger's Side Rear Door Glass Opening

Note: Glass fragments in upper glass channel.

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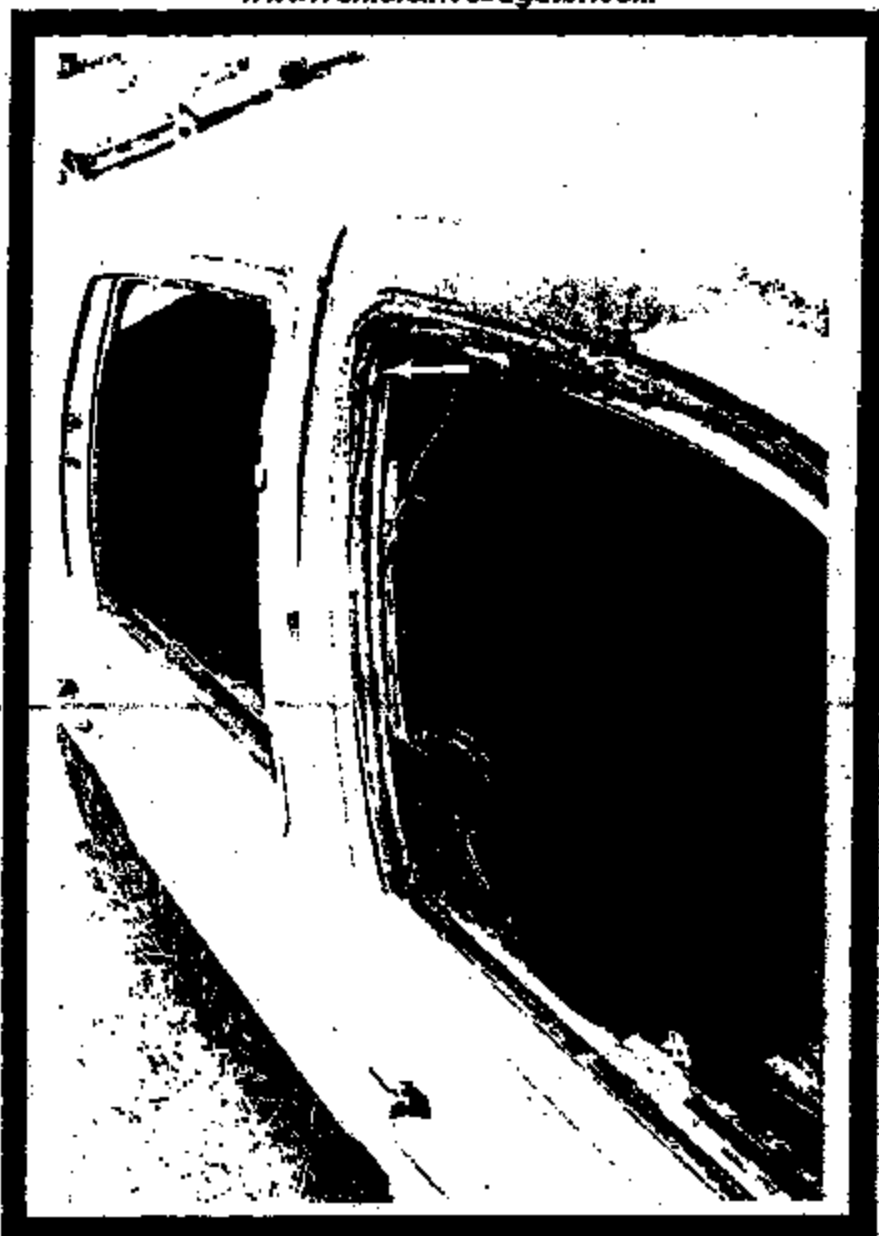
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Photograph: #40

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Driver's Side Front

Note: Glass remains in window channel.

EN02-025.1 0003

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Photograph: #41

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Steering Column

Note: Key lock in the "Off-Lock" position.

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Photograph: #42

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Undercarriage (front)

Note: No fire damage on undercarriage powertrain components.

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Marietta, Ga. 30064

Telephone / Fax (770) 426-6173

or Toll Free (877) 328-3385

www.vehicleinvestigator.com



Photograph: #43

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Undercarriage (mid-ship)

Note: No fire damage on transmission.

Consulting Service

Transportation Technology

1184 Wind Hill Lane

Marietta, Ga. 30064

Telephone / Fax (770) 426-8173

or Toll Free (877) 328-3385

www.vehicleinvestigator.com



Photograph: #44

Transportation Technology : 22050

Date Taken: April 16, 2002

Description of Subject: Undercarriage (rear)

Note: No fire damage at differential.

100 Gateway Corporate Blvd * Columbia, SC 29203 **

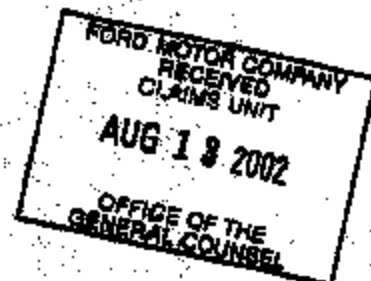
CONSUMER AFFAIRS
SECTION 6, 2002

FORD MOTOR COMPANY CUSTOMER RELATIONSHIP CENTER
P O BOX 6248
DEARBORN, MI 48126

2 AUG 12 AM 34

YOUR INSURED : [REDACTED]
YOUR INSURED'S ADDRESS :

[REDACTED]
Abbeville, SC [REDACTED]



YOUR POLICY NUMBER :
ACCIDENT LOCATION : [REDACTED]
DATE OF ACCIDENT : 03-26-2002
OUR INSURED : [REDACTED]
OUR CLAIM NUMBER : [REDACTED]

GREENWOOD 29646 GREENWOOD

We have been informed that you are the insurance carrier for [REDACTED]. Our investigation of the vehicle fire and resulting loss have determined that this loss was caused by a defective cruise control deactivation switch installed on a 1993 Lincoln Continental owned by our insured.

Please accept this letter as notice of our subrogation rights.

We will contact you with the amount due and provide you with our supporting documents.

Thank you for your cooperation.

NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY
J. Kevin Morris
Claims Department
1-(800)348-8651 Ext. 8577

REDACTED

REDACTED

0902-825.1 0000 (M)