

EA02-025

FORD 10/27/03

LETTER TO ODI

APPENDIX M

BOOK 7 OF 22

PART A-D

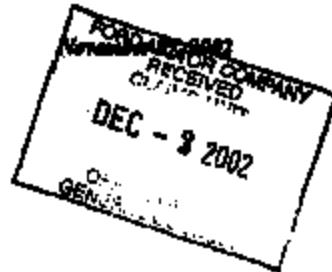
PART A

04/03

27007

FARMERS

Ford Motor Company
Attn: Office of General Counsel
3 Parklane Blvd.
Dearborn, MI 48126



Re: Our Claim Number:

[REDACTED]
6/25/2002
2MELLM7SW5PX468594

Our Insured:

DATE OF LOSS:

Insured VIN:

Farmers
Insurance
Recovery Center

P.O. Box 4470
Towson MD 21204-4470
USA

Phone 410 221 7842
200 544-7814
Fax 7342
Fax 410 221 7232

Dear Sir or Madam:

Attached is our Subrogation interest with supports for your review.

Our investigation as supported by the fire origin and cause report reveal that the inspection of our insured's 1993 Mercury Grand Marquis LS was due to the a resistive short at the speed control deactivation switch. Our damages are as follows:

Re: Total Loss:	\$1,680.00
Deductible:	\$ 500.00
Total Damage:	<u>\$1,180.00¹</u>

This letter serves as notification of our subrogation demand in this matter. Our investigation reveals that financial responsibility for this matter rests with your insured. We expect payment within 15 days.

Please make your check payable to Farmers Insurance Exchange and mail to my attention.

In the interim, if there is anything further that you may require to resolve this claim or you have any questions, please call me at 1-800-944-7515, extension 7342.

Sincerely,

Brandon C Boyer
Subrogation Claims Representative
Farmers Insurance Exchange

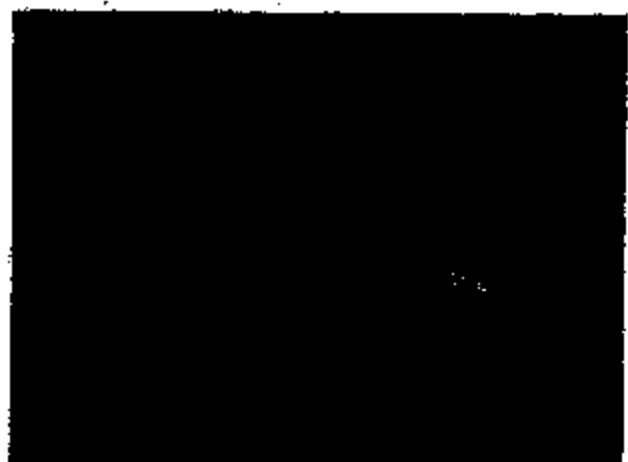
MS

¹ Please be advised that no partial payment that is less than the full amount claimed herein will be construed in any way as acceptance of benefits or as a valid and satisfaction of this claim without an express written release of our claim created by an individual who identifies himself/herself as a member of our mitigation department. Therefore, our legal rights to enforce collection on the remaining portion of the claim shall not be waived or stopped due to a partial payment by you or someone acting on your behalf.

A. S. M.
P.O. BOX 505
MADISON, MS 39130
BRET MCCULLOUGH



R/rear



R/front



L/front



L/rear

CERTIFICATE OF TITLE

STATE OF MISSISSIPPI

REG. NO. 93 584 40
EXPIRES 02-02-06
X PAYEE 06 ORIGINAL

OWNER: [REDACTED]
059532
ACTUAL MILEAGE

DEPOSIT GUARANTY NATIONAL BANK
P.O. BOX 7200
JACKSON MS 39225

01/06/95

Deposited Guaranty National Bank



ISSUED ON THE 10 AUGUST 1995
05214143009 00170

I, the undersigned, do solemnly swear that I am the owner of the vehicle described below. I further swear that I have never sold or given away this vehicle or any interest therein, nor have I ever given it as security for any debt, and that I have not given it to any person to hold for me. I further swear that I have not given it to any person to hold for me.

THIS DOCUMENT IS NOT A CONTRACT

FARMERS

November 15, 2002

Farm Mutual Company
Attn: Claims/ Legal Department
PO Box 1984
Dearborn, MI 48121

Re: Our Claim Number:

Our Insured:
DATE OF LOSS:
Insured VIN:

[REDACTED]
6/26/2002
2MFLM72W7021600014

Dear Sir or Madam:

Attached is our Subrogation interest with supports for your review.

Our investigation as supported by the fire origin and cause report reveal that the inspection of our insured's 1993 Mercury Grand Marquis L5 was due to the a relative short at the speed control demagnetization switch. Our damages are as follows:

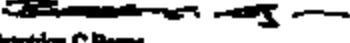
Re: Total Loss:	\$2,000.00
Deductibles	0.00
Total Damages:	\$2,000.00¹

This letter serves as notification of our subrogation demand in this matter. Our investigation reveals that financial responsibility for this matter rests with your Insured. We expect payment within 15 days.

Please make your check payable to Farmers Insurance Exchange and mail to my attention.

In the interim, if there is anything further that you may require to resolve this claim or you have any questions, please call me at 1-800-944-7513, extension 7342.

Sincerely,


Debra C Boyer
Subrogation Claims Representative
Farmers Insurance Exchange

¹Please be advised that no partial payment shall be less than the full amount claimed initially, and to be completed in any way an acceptance of liability or an amount paid satisfaction of this claim without an express written release of the claim caused by an individual who identifies himself/herself as a member of the subrogation department. Therefore, our legal rights to enforce collection on demanding amount of the claim shall not be waived or stopped due to a partial payment by you or anyone acting on your behalf.

EMR2-626 27095

Brown **SOUTHEASTERN FIRE INVESTIGATIONS**

15 CRANES ROAD
MADISON, MS 39040
PHONE (662) 655-2000
FAX (662) 655-2498

FIRE ORIGIN AND CAUSE DETERMINATION

BALTIMORE SUBPOENA

for

NOV 4 2002

Parmar's Insurance Co.
Mr. Joe Padgett
2035 Red Oak Drive
Brandon, MS 39042

RE: Vehicle Fire

Jackson, MS

Claim #

SFI Case # 02-190

New Claim #

Re-Kaged: 1001714521-1-2

July 20, 2002

FIRE ORIGIN & CAUSE DETERMINATIONS

E982-025 27800

SOUTHEASTERN FIRE INVESTIGATIONS

129 BRIDGE ROAD
MADISON, MS 39110
PHONE (662) 625-2090
FAX (662) 625-0498

July 20, 2002

Cust: Farmer's Insurance Co.
2035 Red Oak Drive
Brandon, MS 39042

Re: Vehicle No. [REDACTED]

Jackson, MS

Alt: Mr. Joe Padgett

Claim #: [REDACTED]
SFI Case #: 02-190

FIRE SCENE SURVEY

On June 26, 2002, Mr. Joe Padgett requested a fire origin and cause investigation of the referenced fire. Mr. Padgett said the fire involved a 1993 Mercury Marquis parked in the [REDACTED] backyard that caught fire around 3:00 a.m. on June 25, 2002. Mr. Padgett said [REDACTED] moved the car from the driveway to the backyard around 8:00 the previous night. Mr. Padgett said the car was totally burned and had not been moved from, the [REDACTED] backyard.

On June 28, I checked the National Highway Transportation Safety Administration's web page and found campaign ID #97V124000 involving 1993 Mercury Grand Marquis. The recall date was May 20, 1999 and affected vehicles manufactured between 2-1992 through 11-1992. The recall involved the speed control deactivation switch and stated it could develop a resistance short in the electrical circuit that could potentially result in an under hood fire. The recall also stated "a fire is possible both when the vehicle is running and when the vehicle engine is off".

On July 1, I went to the [REDACTED] home to examine the car. The car was parked in the backyard near a tractor that received light fire damage. The vehicle was totally burned which left very few signs of direction of fire travel. However, the condition of windshield glass and staining on the bottom of the brake booster indicated the area of origin was under the brake booster on the driver side of the engine compartment. Because of possible further investigation, none of the wiring or engine components in the area of the brake booster were moved.

I phoned Mr. Padgett and told him about the recall and recommended an automotive consultant examine the vehicle to determine whether the speed control

FIRE ORIGIN & CAUSE DETERMINATIONS

662-625-27807

Farmer's Insurance Co.
Claim # 1001 6619 18

Fire Scene Survey
FDI Case #02-190

deactivation switch under the brake booster could have caused the fire. Mr. Padgett agreed, and I contacted Automotive Consultant Steve Miller in Raymond, Mississippi. Mr. Miller inspected the car on July 2 and his report was received on July 10. On July 2, I talked to [REDACTED]. [REDACTED] purchased the car new from Tom Wimberly in Jackson, Mississippi in July or August, 1993. [REDACTED] did not remember the mileage on the odometer because he has four vehicles. He has never experienced any problems with the car and does not remember receiving any recall notices from Mercury. No warranty work was done on the car and no service work other than oil changes. Quality Car Care in Jackson charged oil in the car except for "maybe once or twice" when Tom Wimberly charged the oil when it was new. He said he kept the car in "tip-top shape and serviced". He last drove the car before the fire on Monday (the fire was Tuesday morning around 5:00 a.m.) when he and his wife went to eat at the Cook of the Wolf at the Ross Bennett Reservoir between 5:30 and 6:00 p.m. The car drove as normal at that time, and was "running like a dream". They came home and he parked the car in the driveway and later moved it to the backyard around 8 p.m. because some of his workers were coming to get a tractor on the following morning and the car would be in the way. A neighbor driving home from work discovered the fire and attempted to awaken the [REDACTED] but could not. He went next door and told [REDACTED] son, [REDACTED] son came outside and turned the engine on the tractor and moved it away from the car and the tractor was only slightly damaged by the fire. [REDACTED] said he was awakened and informed of the fire and when he came outside the car was "fully involved".

I also talked with [REDACTED] on July 5 when I returned to get the speed control deactivation switch Mr. Miller had placed in a plastic bag on the driver seat. [REDACTED] said he had forgotten to tell me his cruise control quit working approximately a month prior to the fire. He said he had an appointment at Quality Car Care on the morning of the fire to determine what the problem was with the cruise control.

SOUTHEASTERN FIRE INVESTIGATIONS

10 SHARPTON ROAD
MADISON, MS 39110
PHONE (662) 625-2224
FAX (662) 625-2448

July 20, 2002

Client: Farmer's Insurance Co.
2035 Red Oak Drive
Brenton, MS 39042

Re: Vehicle Fire

[REDACTED]
Jackson, MS

Attn: Mr. Joe Padgett

Claim # [REDACTED]
SFI Case # [REDACTED]

CONCLUSION

Burn patterns indicated the origin of the fire was on the driver side of the engine compartment under the brake booster on the firewall. Mr. Miller's opinion was that a reflective shot at the speed control deactivation switch under the brake booster caused the fire.

Respectfully submitted,

Ed Morgan
ED MORGAN
FIRE SCENE INVESTIGATOR

EM:kms

FIRE ORIGIN & CAUSE DETERMINATIONS

5002-625 27000

STEPHEN M. MILLER
Automotive Inspector • Consultant • Dispute Settler
ASE Certified Master Auto Technician & H-D Truck Technician
Phone 601-937-3492 or 601-937-2237 • FAX 601-937-3430 or 601-937-0796
P.O. Box 892 Raymond, MS. 39154

July 7, 2002, 2002

Ed Morgan
Southeastern Fire Investigations
119 Sharp Road
Madison, MS 39110

RE: Inspection of 1993 Mercury Grand Marquis LS
VIN: 2M4ELM75W3PXXXXXX

Insured:	[REDACTED]
Insurance Co:	Parsons Insurance
Claim#:	1001 6619 1B
SFT Date:	62-100
DOL:	06/25/02
DOI:	07/02/02

Mr. Morgan

At your request I inspected a 1993 Mercury Grand Marquis LS insured by [REDACTED] [REDACTED] to determine cause and origin of vehicle loss. Vehicle inspection was performed on July 7th at the insurer's home, [REDACTED], Jackson, MS.

It was reported that the vehicle was parked in the back yard the night before the loss and was found burning the next morning.

Vehicle was a total burn and the aluminum hood was completely gone with the exception of a few remnants in the corners. The only indicator of origin is heat impairment on bottom of brake booster. The brake booster is located in the left rear section of the engine compartment, and is mounted to the firewall. The wires in the wiring harness directly below the brake booster are brittle indicating high heat, but no arcing was evident. Fire broke through the windshield and entered the passenger compartment on the left side of the vehicle above the brake booster.

The Speed Control Deactivation Switch, which is connected to the brake system through a Mack compressor connector, is mounted to the frame rail with a bracket

below the brake booster. Ford Motor Company issued Vehicle Recall 97V124000, which stated certain 1993 and 1995 Crown Victoria and Grand Marquis with Speed Control could develop a resistance short in the electrical circuit of the Speed Control Deactivation Switch that could potentially result in an under-hood fire. A fire is possible both when the vehicle is running and when the vehicle engine is off. I have included copies of this recall, the recall letter to the dealers, and the recall letter sent to the owners with my report.

It is my opinion that the fire, which originated in the left rear section of the engine compartment, was a result of resistance short at the Speed Control Deactivation Switch.

If I can be of further assistance in this matter please do not hesitate to contact me.

Sincerely

Steve Miller
AMT Certified Master Auto
& Heavy Duty Truck Technician

STEPHEN M. MILLER

Automotive Inspector * Consultant * Dispute Doctor
AAS Certified Master Auto Technician & H-D Truck Technician
Phone 601-857-3482 or 601-857-3527 * FAX 601-857-3438 or 601-857-8798
P.O. Box 592 Raymond, MS 39154

July 7, 2002, 2001

Ed Morgan
Southwestern Fire Investigations
119 Sharpe Road
Madison, MS 39110

Re: Photographs of Loss of a 1993 Mercury Grand Marquis LS
VIN# 2M2ELMTSWFKA06396

Insurer:	[REDACTED]
Insurance Co#:	[REDACTED]伤亡 Insurance
Claim#:	[REDACTED]
SPT Credit:	63-100
DOL:	06/25/02
DOI:	07/02/02

List:

1. View of vehicle taken from front. (note more damage to left front of vehicle when compared to right front)
2. View of vehicle taken from rear.
3. View of alternator, which is located in the front center of engine compartment. (note damage is more evident on top of alternator case indicating fire moving from rear of engine compartment towards front)
4. View of brake booster and master cylinder assembly. (note heat (ingagement on bottom of brake booster indicating fire originating below booster))
5. View of bottom of brake booster and wiring harness, which is routed beneath it.
6. View of area below the brake booster. This is the area where the Speed Control Deactivation Switch is located.
7. Front view of Speed Control Deactivation Switch and the wires found with it. (note these wires were extremely brittle indicating intense heat).
8. Side view of Speed Control Deactivation Switch and wires found with it.
9. Relays, which had to be removed to maneuver the Speed Control Deactivation Switch, indicates fire originating low in the engine compartment at the switch. (pictured are the windshield wiper motor, windshield glass, and a relay)

PHOTO #1
Shows the car in the
location it turned in
the Duran's back-
yard.



PHOTO #2
Shows the driver side
of the car.



PHOTO #3

Shows the rear of the car.



PHOTO #4

Shows the passenger side of the car.



PHOTO #6
Shows the front of
the car with the
greatest damage on
the driver side that is
the right side of the
car in this photo.



PHOTO #6 & 7
Close ups of the front of the car on the passenger and driver side, respectively, and more clearly show the greater damage on the driver side.



PHOTO #7



PHOTO #8
Shows the top of the car and interior as viewed through the opening for the windshield.



PHOTO #9
An overhead view of the engine as taken from the front of the car.



PHOTO #10 & 11
Overhead views of
the engine as taken
from the driver and
passenger sides,
respectively.



PHOTO #11

PHOTO #12
Shows the battery cables and nearby wiring. Insulation was burned from around the cables, but the cables were continuous with no indications of heating or arcing.



PHOTO #13 & 14
Show the driver side
of the engine
compartment as
viewed from the
driver side and front
end, respectively.



PHOTO #14



PHOTO #15
Shows the brake booster and surrounding area on the bulkhead or firewall on the driver side of the engine compartment. The lower or bottom part of the brake booster was dislodged from exposure to heat.

PHOTO #16 & 17
An overall and close up view of the area under the brake booster on the firewall.



PHOTO #17

ER02-025 28824

PHOTO #18
Shows the dashboard.



PHOTO #19
Shows the rear
interior of the car.



The following photographs were taken by Mr. Steve Miller on July 2, 2002

PHOTO #1

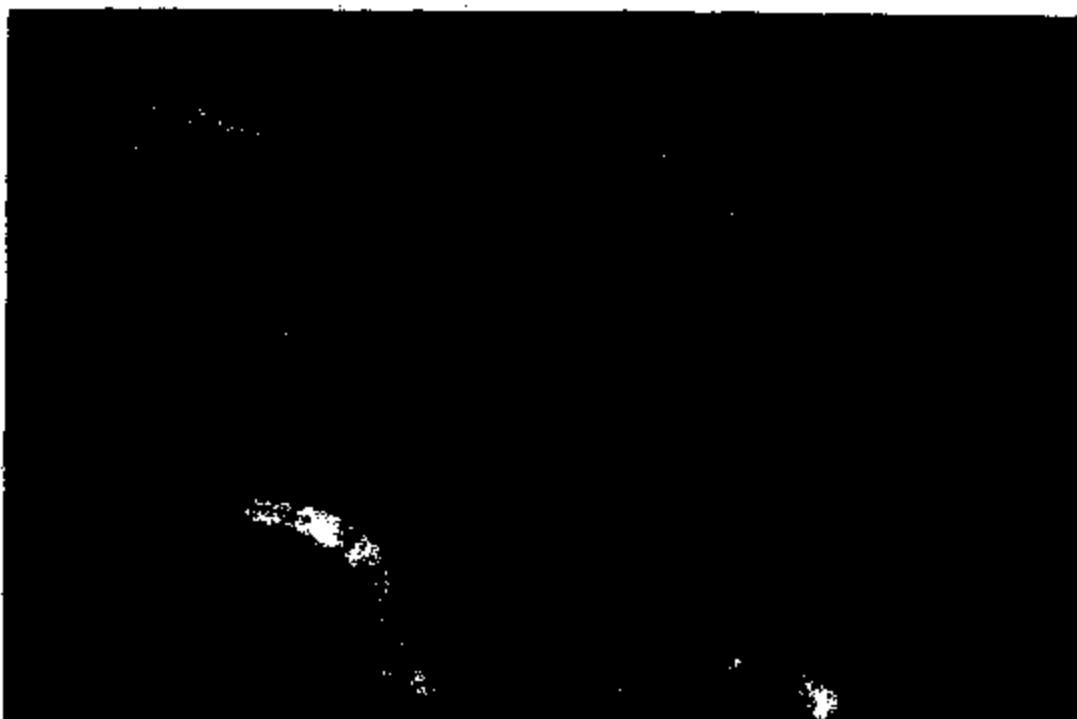
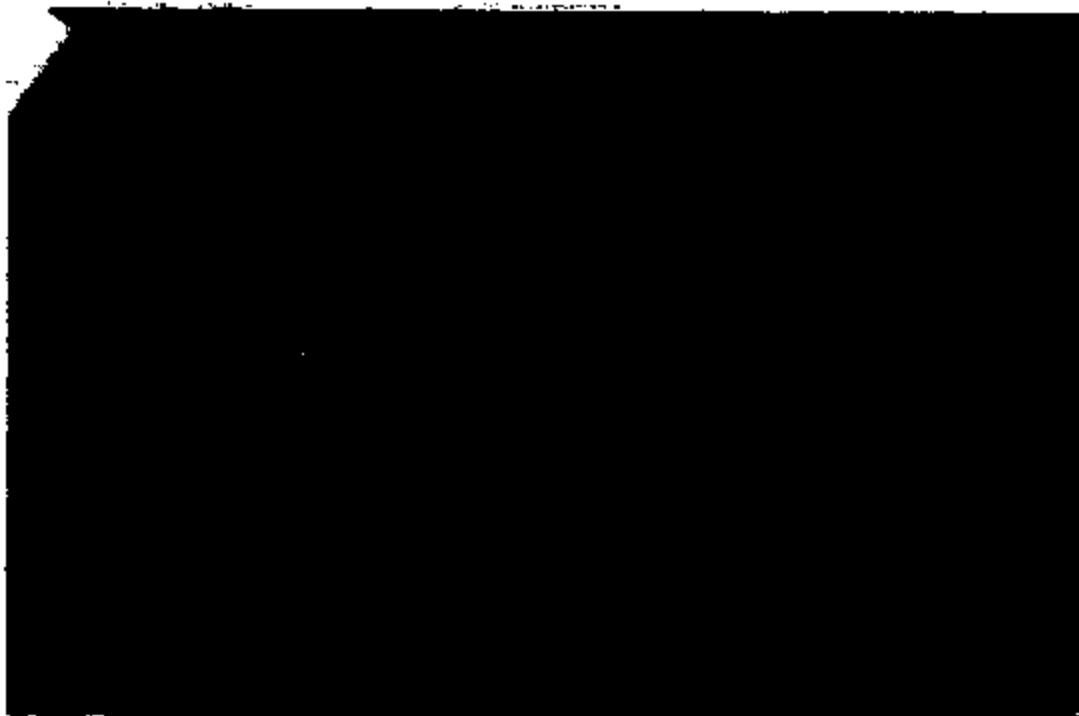


PHOTO #2



5462-025 28828

PHOTO #3



PHOTO #4



5982-625 28827

PHOTO #5

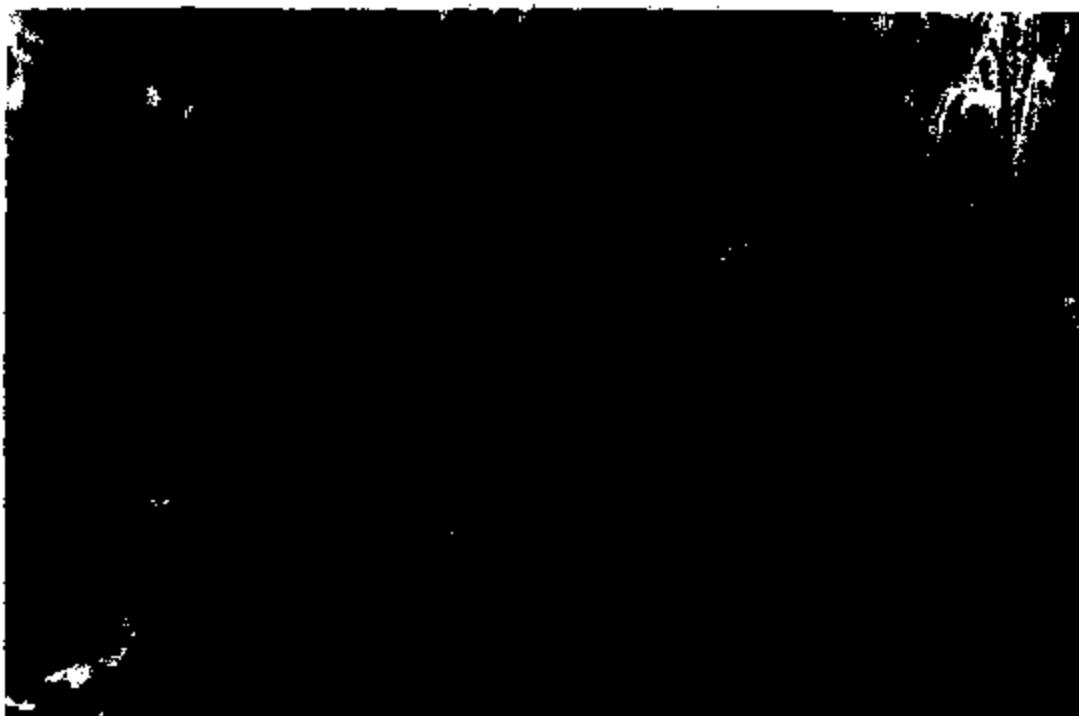


PHOTO #6



5082-825 28028

PHOTO #7

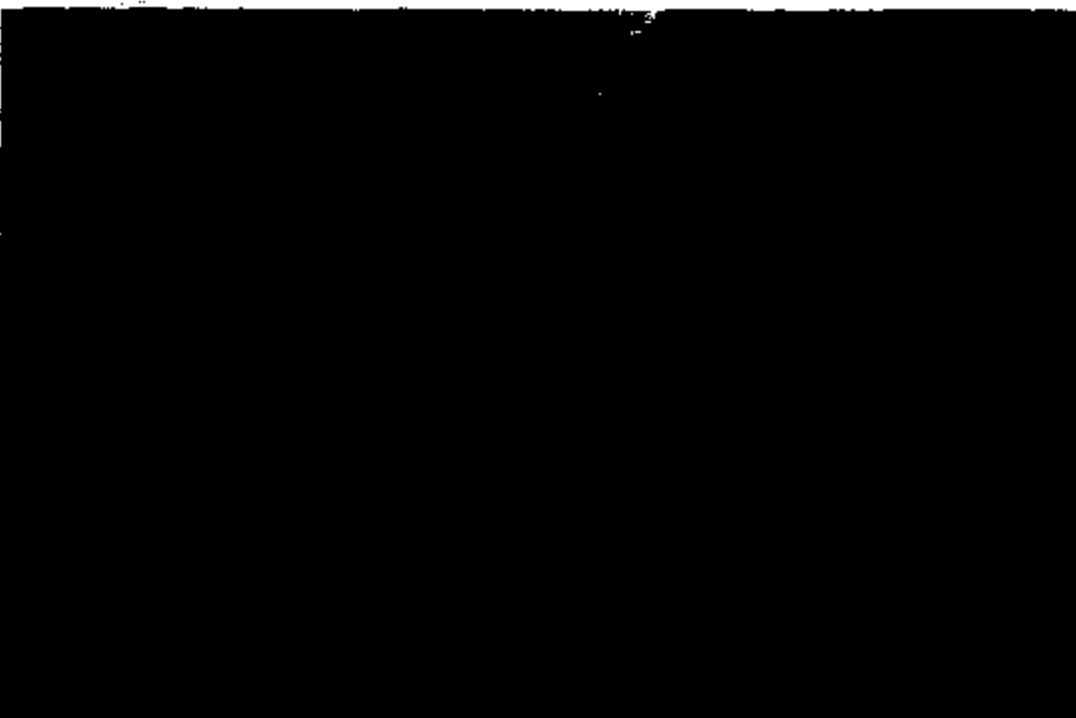


PHOTO #8



EM2-025 28839

PHOTO #9



5402-025 28836

FARMERS

November 15, 2002

Ford Motor Company
Attn: Claims/Legal Department
PO Box 1904
Dearborn, MI 48121

FORD MOTOR COMPANY
RECEIVED

NOV 21 2002

Re: Our Claim Number:
Our Insured:
DATE OF LOSS:
Insured VIN:

6/29/2002
2MELM75W5PX608586

Farmers
Insurance
Exchange Center

P.O. Box 4076
Towson MD 21204-4076
USA

Phone 410 261 7500
800 944-7515
Fax 7342
Fax 410 261 7338

Dear Sir or Madam:

Attached is our Subrogation interest with supports for your review.

Our investigation as supported by the fire origin and cause report reveal that the inspection of our insured's 1993 Mercury Grand Marquis LS was due to the a resistive short at the speed control deactivation switch. Our damages are as follows:

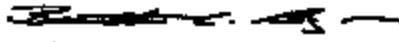
Re: Total Loss:	\$3,600.00
Deductible:	\$ 300.00
Total Damages:	<u>\$2,100.00¹</u>

This letter serves as notification of our subrogation demand in this matter. Our investigation reveals that financial responsibility for this matter rests with your insured. We expect payment within 15 days.

Please make your check payable to Farmers Insurance Exchange and mail to my attention.

In the interim, if there is anything further that you may require to resolve this claim or you have any questions, please call me at 1-800-944-7515, extension 7342.

Sincerely,


Brianne C Boyer
Subrogation Claims Representative
Farmers Insurance Exchange

NOV 16 2002

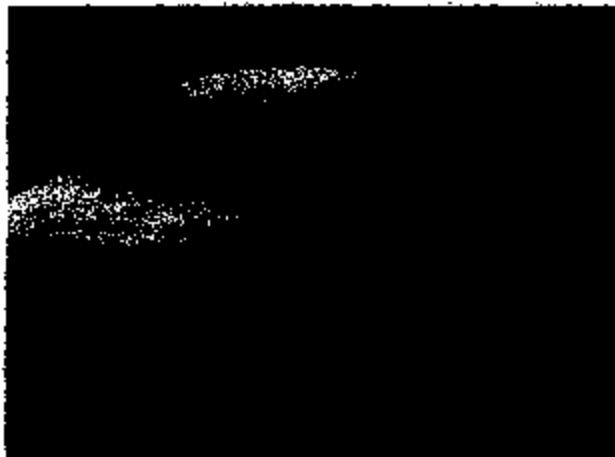
SP-1240
SOLICITATION
NOV 12 2002

¹ Please be advised that no partial payment that is less than the full amount claimed herein will be considered in any way an acceptance of benefits or an accord and satisfaction of this claim without an express written release of our claim created by an individual who purports himself/herself as a member of our subrogation department. Therefore, our legal rights to enforce collection on the remaining amount of the claim shall not be waived or stopped due to a partial payment by you or someone acting on your behalf.

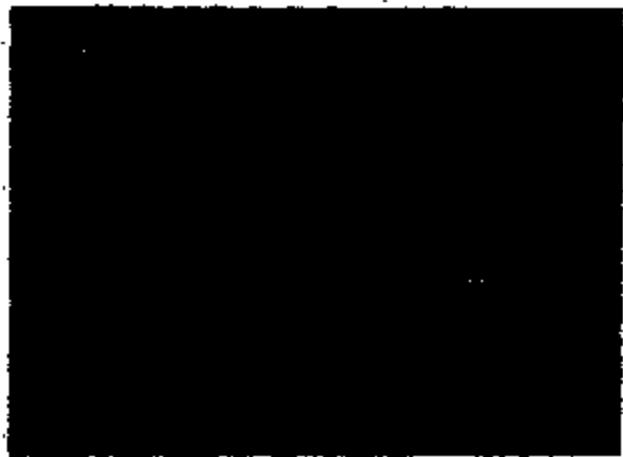
5002-522 28033 N

REDACTED

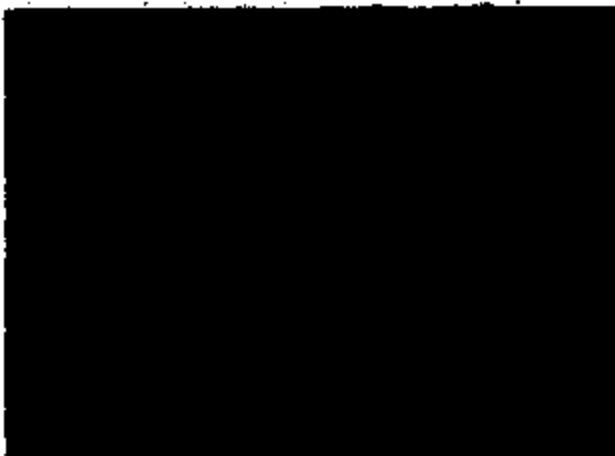
A. S. MT.
P.O. BOX 505
MADISON, MS 39130
BRET MCCULLOUGH



R/rear



R/front



L/front



L/rear

Brown

SOUTHEASTERN FIRE INVESTIGATIONS

119 SHARPS ROAD
MADISON, MS 39110
PHONE (601) 605-2098
FAX (601) 605-2498

FIRE ORIGIN AND CAUSE DETERMINATION

ANTONIO SANCHEZ

for

MUY 4 2002

Farmer's Insurance Co.
Mr. Joe Padgett
2035 Red Oak Drive
Brandon, MS 39042

RE: Vehicle Fire

*[Redacted]
Jackson, MS*

Claim

SFI Case # 02-190

New Claim

Re Keyed : 1001714521-1-2

July 20, 2002

FIRE ORIGIN & CAUSE DETERMINATIONS

602-625 2498

Farmer's Insurance Co.
Claim # 1001 6619 18

Fire Scene Survey
SFI Case #02-190

deactivation switch under the brake booster could have caused the fire. Mr. Padgett agreed, and I contacted Automotive Consultant Steve Miller in Raymond, Mississippi. Mr. Miller inspected the car on July 2 and his report was received on July 10. On July 2, I talked to [REDACTED] [REDACTED] purchased the car new from Tom Wimberly in Jackson, Mississippi in July or August, 1993. [REDACTED] did not remember the mileage on the odometer because he has four vehicles. He has never experienced any problems with the car and does not remember receiving any recall notices from Mercury. No warranty work was done on the car and no service work other than oil changes. Quality Car Care in Jackson changed oil in the car except for "maybe once or twice" when Tom Wimberly changed the oil when it was new. He said he kept the car in "tiptop shape and serviced". He last drove the car before the fire on Monday (the fire was Tuesday morning around 5:00 a.m.) when he and his wife went to eat at the Cock of the Walk at the Ross Barnett Reservoir between 5:30 and 6:00 p.m. The car drove as normal at that time, and was "running like a dream". They came home and he parked the car in the driveway and later moved it to the backyard around 8 p.m. because some of his workers were coming to get a tractor on the following morning and the car would be in the way. A neighbor driving home from work discovered the fire and attempted to awaken the [REDACTED] but could not. He went next door and told [REDACTED]'s son. His son came outside and cranked the engine on the tractor and moved it away from the car and the tractor was only slightly damaged by the fire. [REDACTED] said he was awakened and informed of the fire and when he came outside the car was "fully involved".

I also talked with [REDACTED] on July 5 when I returned to get the speed control deactivation switch Mr. Miller had placed in a plastic bag on the driver seat. [REDACTED] said he had forgotten to tell me his cruise control quit working approximately a month prior to the fire. He said he had an appointment at Quality Car Care on the morning of the fire to determine what the problem was with the cruise control.

SOUTHEASTERN FIRE INVESTIGATIONS

119 SHARPS ROAD
MADISON, MS 39110
PHONE (601) 605-2098
FAX (601) 605-2498

July 20, 2002

Client: Farmer's Insurance Co.
2035 Red Oak Drive
Brandon, MS 39042

Re: Vehicle Fire

[REDACTED]
Jackson, MS

Attn: Mr. Joe Padgett

Claim # [REDACTED]
SFI Case # [REDACTED]

CONCLUSION

Burn patterns indicated the origin of the fire was on the driver side of the engine compartment under the brake booster on the firewall. Mr. Miller's opinion was that a resistive short at the speed control deactivation switch under the brake booster caused the fire.

Respectfully submitted,

Ed Morgan
ED MORGAN
FIRE SCENE INVESTIGATOR

EM:kmm

FIRE ORIGIN & CAUSE DETERMINATIONS

ENR2-022 20020

PHOTO #1
Shows the car in the
location it burned in
the Duran's back-
yard.



PHOTO #2
Shows the driver side
of the car.



PHOTO #3
Shows the rear of the car.



PHOTO #4
Shows the passenger side of the car.



PHOTO #5
Shows the front of
the car with the
greatest damage on
the driver side that is
the right side of the
car in this photo.



PHOTO #6 & 7
Close ups of the front of the car on the passenger and driver side, respectively, and more clearly show the greater damage on the driver side.



PHOTO #7



PHOTO #8
Shows the top of the
car and interior as
viewed through the
opening for the
windshield.



PHOTO #9
An overhead view of
the engine as taken
from the front of the
car.

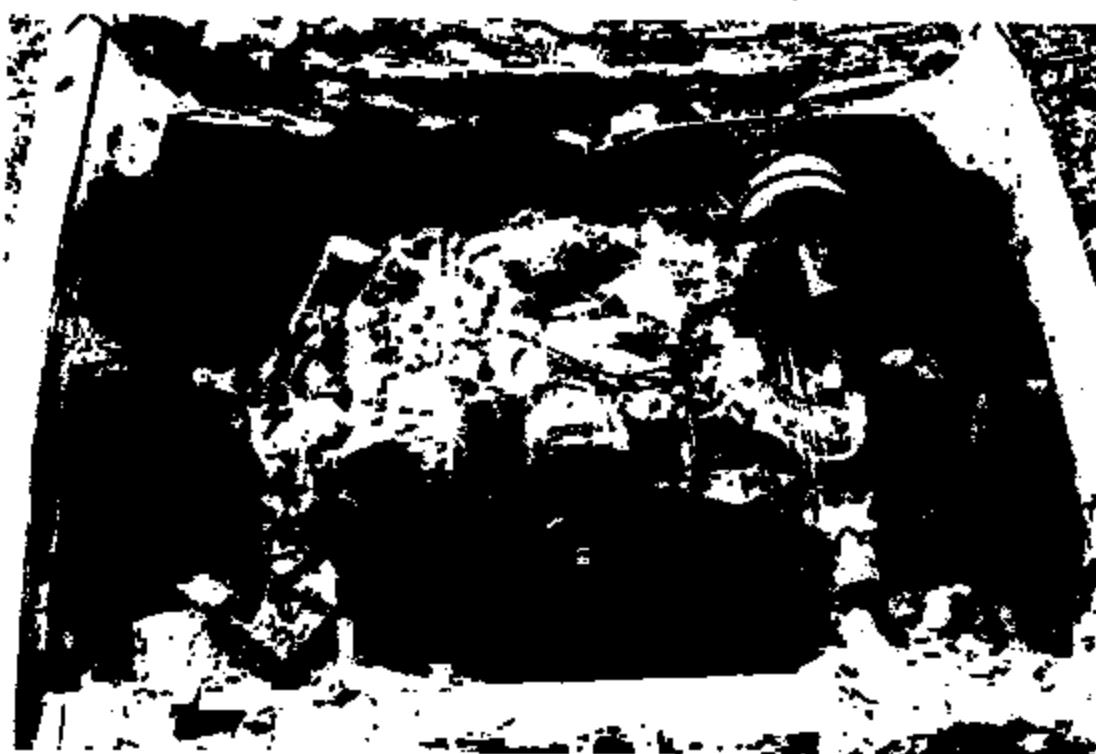


PHOTO #10 & 11
Overhead views of
the engines as taken
from the driver and
passenger sides,
respectively.



PHOTO #11



ERB2-025 28848

PHOTO #12
Shows the battery cables and nearby wiring. Insulation was burned from around the cables, but the cables were continuous with no indications of bending or arcing.



PHOTO #13 & 14
Show the driver side
of the engine
compartment as
viewed from the
driver side and front
end, respectively.



PHOTO #14

PHOTO #15
Shows the brake booster and surrounding area on the bulkhead or firewall on the driver side of the engine compartment. The lower or bottom part of the brake booster was discolored from exposure to heat.



PHOTO #16 & 17
An overall and close up view of the area under the brake booster on the firewall.



PHOTO #17



PHOTO #18
Shows the dashboard



PHOTO #19
Shows the rear
interior of the car.



STEPHEN M. MILLER
Automotive Inspector * Consultant * Dispute Settler
ASE Certified Master Auto Technician & H-D Truck Technician
Phone 601-857-3492 or 601-857-2527 * FAX 601-857-3420 or 601-857-4790
P.O. Box 892 Raymond, MS. 39154

July 7, 2002

Ed Morgan
Southeastern Fire Investigations
119 Sharpe Road
Madison, MS 39110

RE: Inspection of 1993 Mercury Grand Marquis LS
VIN#: 2M8LM7SWSPX668986

Insured:	[REDACTED]
Insurance Co:	Farmers Insurance
Claim#:	[REDACTED]
SFI Case#:	02-189
DOL :	06/25/02
DOI :	07/02/02

Mr. Morgan

At your request I inspected a 1993 Mercury Grand Marquis LS insured by Charles Duran to determine cause and origin of vehicle loss. Vehicle inspection was performed on July 2nd at the insurer's home, [REDACTED] Jackson, MS.

It was reported that the vehicle was parked in the back yard the night before the loss and was found burning the next morning.

Vehicle was a total burn and the aluminum hood was completely gone with the exception of a few remnants in the corners. The only indicator of origin is heat impairment on bottom of brake booster. The brake booster is located in the left rear section of the engine compartment, and is mounted to the firewall. The wires in the wiring harness directly below the brake booster are brittle indicating high heat, but no arcing was evident. Fire broke through the windshield and entered the passenger compartment on the left side of the vehicle above the brake booster.

The Speed Control Deactivation Switch, which is connected to the brake system through a block compression connector, is mounted to the frame rail with a bracket

STEPHEN M. MILLER
Automotive Inspector * Consultant * Dispute Settler
ASE Certified Master Auto Technician & H-D Truck Technician
Phone 601-857-3492 or 601-857-2527 * FAX 601-857-3420 or 601-857-0790
P.O. Box 892 Raymond, MS. 39154

July 7, 2002, 2002

Ed Morgan
Southeastern Fire Investigations
119 Sharpe Road
Madison, MS 39110

RE: Photographs of Loss of a 1993 Mercury Grand Marquis LS
VIN#: 2MELM75W3PX66836

Insured: [REDACTED]
Insurance Co: Farmers Insurance
Claim#: [REDACTED]
SFI Case#: 02-189
DOL: 06/25/02
DOI: 07/02/02

List:

1. View of vehicle taken from front. (note more damage to left front of vehicle when compared to right front)
2. View of vehicle taken from rear.
3. View of alternator, which is located in the front center of engine compartment. (note damage is more evident on top of alternator case indicating fire moving from rear of engine compartment towards front)
4. View of brake booster and master-cylinder assembly. (note heat impairment on bottom of brake booster indicating fire originating below booster)
5. View of bottom of brake booster and wiring harness, which is routed beneath it.
6. View of area below the brake booster. This is the area where the Speed Control Deactivation Switch is located.
7. Front view of Speed Control Deactivation Switch and the wires found with it. (note: these wires were extremely brittle indicating intense heat)
8. Side view of Speed Control Deactivation Switch and wires found with it.
9. Debris, which had to be removed to uncover the Speed Control Deactivation Switch, indicates fire originating low in the engine compartment at the switch. (pictured are the windshield wiper motor, windshield glass, and a relay)

below the brake booster. Ford Motor Company issued Vehicle Recall 99V124000, which stated certain 1992 and 1993 Crown Victoria and Grand Marquis with Speed Control could develop a resistive short in the electrical circuit of the Speed Control Deactivation Switch that could potentially result in an under-hood fire. A fire is possible both when the vehicle is running and when the vehicle engine is off. I have included copies of this recall, the recall letter to the dealers, and the recall letter sent to the owners with my report.

It is my opinion that the fire, which originated in the left rear section of the engine compartment, was a result of resistive short at the Speed Control Deactivation Switch.

If I can be of further assistance in this matter please do not hesitate to contact me.

Sincerely

Steve Miller
ASE Certified Master Auto
& Heavy Duty Truck Technician

PHOTO #9



2002-025 2882

PHOTO #7

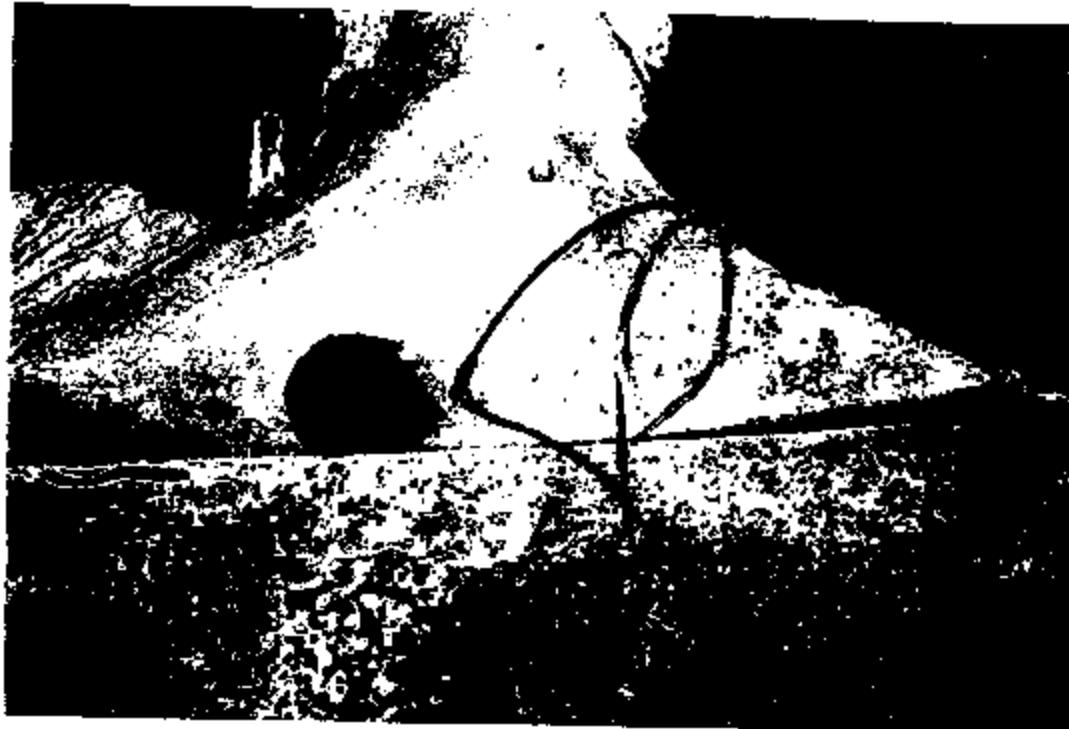


PHOTO #8



5402-023 26063

PHOTO #5



PHOTO #6



E902-025 28864

PHOTO #3



PHOTO #4

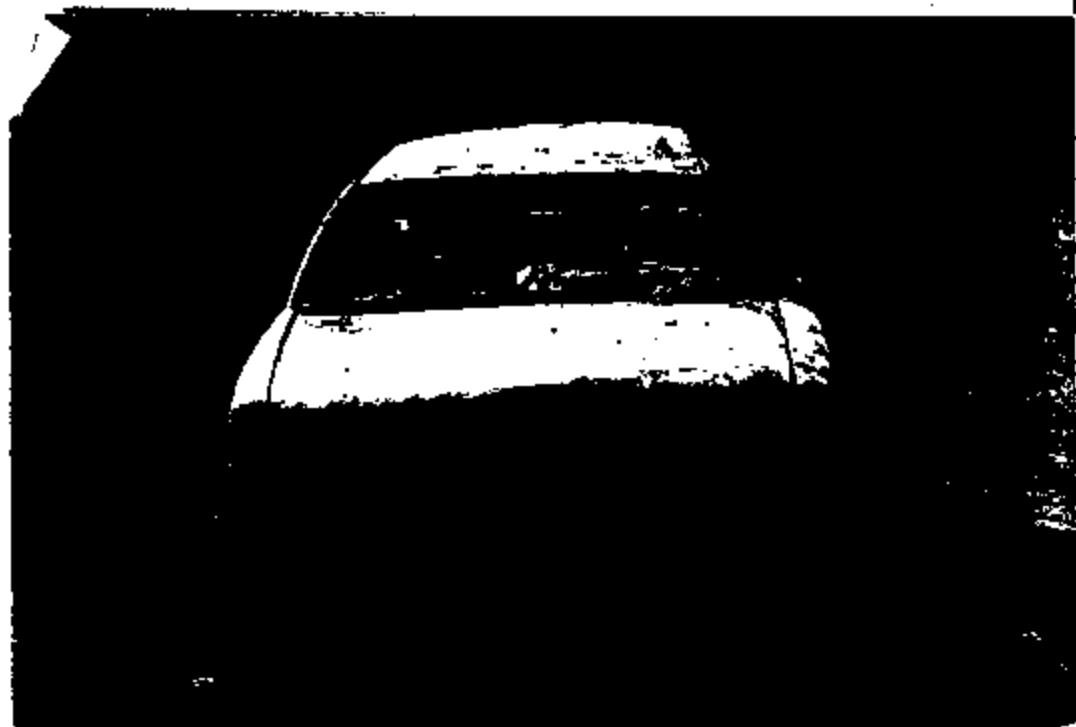


EM2-425 2888

PHOTO #1



PHOTO #2



2022-026 26466

1-02
ARobins
TN

435802

AR

1229-10
1-104C-55

8742-925-9 11278

State Farm Insurance Companies



Claim Service Center
P.O. Box 24448
8148 Lee Highway
Chattanooga, TN 37422-4448
Telephone: (423) 855-6700

November 8, 2000

Ford Motor Company
Parklane Towers West
Suite 400, #3 Parklane Boulevard
Dearborn, MI 48126-2568



RE: Claim Number: [REDACTED]
Our Insured:
Date of Loss: 11/01/2000
Make/Model/Year: 1993 Lincoln Town Car
VIN Number: 1LNLM81W1TY748802

Dear Sir or Madam:

The identified 1993 Lincoln Town Car is insured by State Farm Mutual Automobile Insurance Company. This 1993 Lincoln Town Car experienced a fire loss.

State Farm would like to give you an opportunity to inspect the 1993 Lincoln Town Car, and give you the advanced notice of our potential subrogation claim.

Please contact me at (423) 855-6724 to set up a time for your inspection.

Sincerely,


Tim Oliver
Claim Specialist
State Farm Mutual Automobile Insurance Company
423-855-6724

TO/025/1108017

EAB2-625-B 11271 -

HOME OFFICE: BLOOMINGTON, ILLINOIS 61710-0001

State Farm Insurance Companies

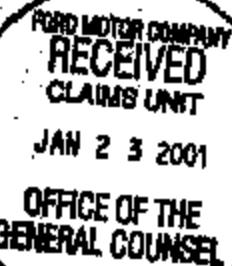


January 18, 2001

*Recd
435602
A.R.*

South Central Office
2800 Memorial Blvd.
P.O. Box 20725
Murfreesboro, TN 37129-0002

Ford Motor Co., Parkland Towers West,
Suite 300, Three Parkland Blvd
Dearborn, MI 48126



RE: Our Claim Number: [REDACTED]

Our Insured:

Date of Loss:

Amt. State Farm Paid:

Insured's Deductible:

November 1, 2000

\$7,946.50

\$250.00

Your Insured:

Ford Motor Co. Parkland Towers

West

Address:

Suite 300, Three Parkland Blvd

Dearborn, MI 48126

Claim Number:

Policy Number:

Dear Ford Motor Co. Parkland Towers West:

We have been informed that you are the insurance carrier for the party designated as your insured in the above caption.

Our investigation indicates that your insured is responsible for this loss.

Please accept this letter as a notice of our subrogation rights and communicate with us in regard to your position in this matter.

Sincerely,

[REDACTED]

Rep 1 Subrogation
Subrogation Department
(877) 236-5890

State Farm Fire And Casualty Company

Enclosure

ENTER VIN ==> 1LNLM81W1PY748802

NAME ==> NORTON

ZIP ==> [REDACTED]

MODEL YR ==>

OWNER NAME
STREET ADDR [REDACTED]

CITY : BOWLING GREEN

N/A YY-MM-DD 96-02-08

ST/PRV: KY CTRY:

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

MODEL YEAR : 93 PLANT: Y

SALE YY-MM-DD 93-06-04

BODY STYLE DESC: 4 DR SEDAN

PRODUCTION YY-MM-DD 93-05-20

VEHICLE DESC : 1993 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	88	D	F71	53	CC
FACING	3	25	C	729		
RESPONSIBLE	3	22	C	546		

CA EMISSION :	8	ENGINE TAG CODE :	3G812BA	CAMPAIGN COUNTS
NAVIS STATUS :	800	COMPANY CAR IND :		TOTAL CAMPAIGNS : 01
DSO DISTRICT :		FLEET CODE :		OPEN : 00 CLOSED : 01
DSO NUMBER :		FLEET STATUS :		ACTIVE: 01 HISTORY: 00

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

OGDB427

ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LNLM81W1PY748802 TYPE OF SEARCH: A
MODEL YEAR: 93 DEFECT: PASS AIR BAG BODY STYLE: 4 DR SEDAN

NEW STATUS CODE: _

REPAIR INFORMATION: TYPE CODE: _

REPAIR DATE: _____ DEALER P/A: _____

MICRO REF: _____ CLAIM NUM: _____

DELETE REASON: _____

RESP DEALER INFORMATION: NEW:

CURRENT: 3 22 546 ASSIGNED: 96-12-19 SOURCE: PX

***** 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				OL
M RELEASED FOR MAILING	97-02-25						
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

OGDB427

ENTER CAMPAIGN NBR => 96L12 VIN => 1LNLM81W1PY748802
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DR SEDAN
RESP DEALER : 322546 BEGINNING MAILED DATE: 97-03-08 YY-MM-DD
RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-03-21 YY-MM-DD
CAMPAIGN DIV : F FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : [REDACTED] INITIALS: DT
STREET ADDR1 : [REDACTED]
ADDR2 : [REDACTED]
CITY : BOWLING GREEN
ZIP/POSTAL CODE: [REDACTED]-A SOURCE: P N-A EFF DATE: 96-02-08 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 :
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
I048-LAST PAGE OGDB427

ENTER CAMPAIGN NUMBER-> 96L12 VIN-> 1LNLM81W1PY748802 TYPE OF SEARCH: A
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

OGDB427



PAUL DAVIS RESTORATION
When Minutes Count And Quality Matters.

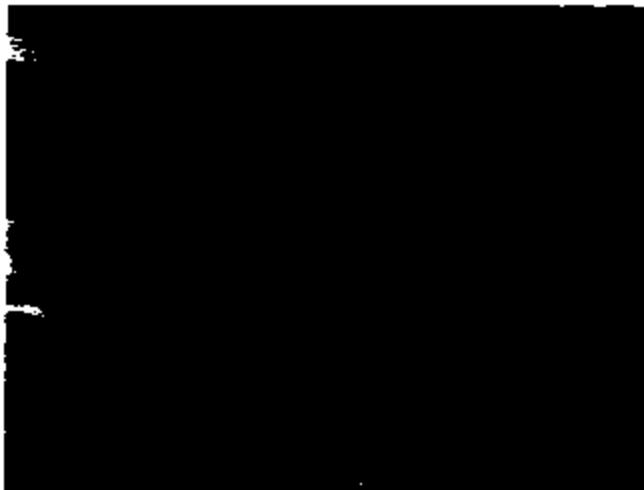
Photo Inspection Report

Claim # [REDACTED]

Insured name: [REDACTED]

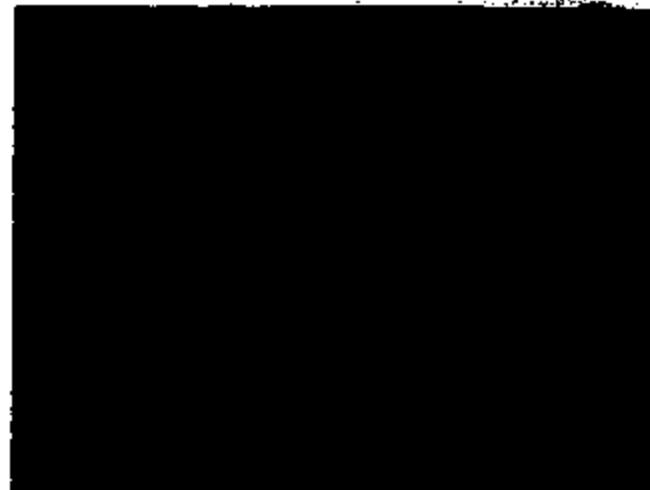
Photos taken on: NOVEMBER 3, 2000

THE INFERNO



CAUSE OF DAMAGE

GARAGE



THE FIRE DAMAGED THE VINYL SIDING AND EAVE WORK.

GARAGE



THE VINYL SIDING WAS DAMAGED DURING THE FIRE.

GARAGE



THE DIRT BANK WILL NEED TO BE MOVED TO PERFORM REPAIRS.



PAUL DAVIS RESTORATION
When Minutes Count And Quality Matters.

Photo Inspection Report

Claim # [REDACTED]

Insured name [REDACTED]

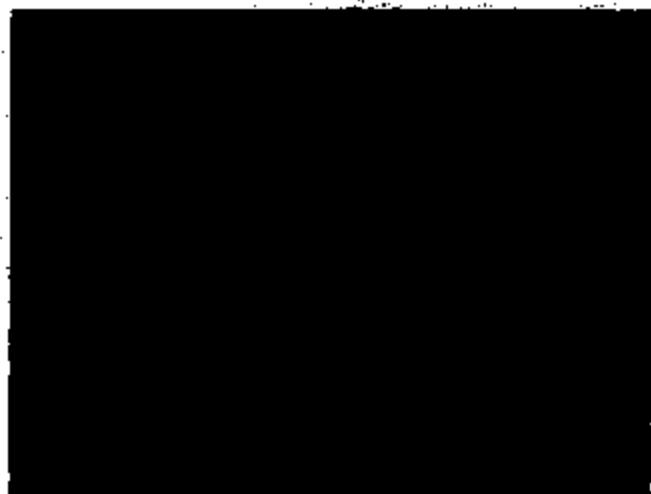
Photos taken on: NOVEMBER 3, 2000

GARAGE



OVERALL VIEW

GARAGE



**THE EXTERIOR WALL WAS EXPOSED TO HEAT
CAUSING THE MORTAR TO POP LOOSE**

GARAGE



**THE EXTERIOR WALL WAS EXPOSED TO HEAT
CAUSING THE MORTAR TO POP LOOSE.**

Tim G. Dunn, P.E.



TELEPHONE (770) 986-2228

FAX (770) 986-0784

November 27, 2000

State Farm Insurance Company
P.O. Box 24448
Chattanooga, TN 37422

Attention: Mr. Tim Oliver

RE: Investigation of Burned Automobile; Insured [REDACTED]
Claim [REDACTED]

Lab No.: 70019

CERTIFICATE OF ANALYSIS

Loss Identification:

Date: November 1, 2000

Vehicle: 1993 Lincoln Towncar Executive Series, 4-door sedan,
VIN 1LNLMB1W1PY748802, Date of Manufacturer - 5/93

Details: A fire occurred in the Eaves 1993 Lincoln Towncar, discovered after this
4-door sedan was parked.

My Investigation:

On November 18, 2000 I investigated this fire loss. Photographs, taken during my investigation, are attached with this report.

At the time of my investigation, the burned automobile was being stored at Sadiaco, in Chattanooga, Tennessee.

The fire was centered in the engine compartment, burning the engine block and attached components, then leaving scorch marks on the compartment walls and surrounding body. The engine hood has melted down. The fire spread into the passenger compartment, burning the seats, dashboard moulding and other interior finish. The front windshield and three of the four (3/4) door windows are broken out. The front tires have burned and melted down.

State Farm Insurance Company
November 27, 2000.
Page 2

Photographs #1-3 are overall views of this 4-door sedan, taken from the exterior, showing the fire buildup and damages at the auto's front end: there are scorch marks on the front quarter panels, beside the engine compartment, while the front bumper padding has melted down.

Photographs #4-6 were taken inside the passenger compartment, where the dashboard moulding has mostly burned and melted down. There are burn marks on the seats, especially the backrest, while the headliner is consumed.

Photographs #8-9 are better views of the dashboard area, also showing the melted down instrument panel. On the front seats, photographs #10-11 are taken of the fallen-in sun visors and rear view mirror; part of these visors have actually melted to the seat cover. The visors and rear view mirror exhibit more heat (rather than burn) damages, which would suggest the fire did not start in the passenger compartment.

At the steering column, I found no keys in the ignition switch. Photographs #12-13 are side and bottom views of the steering column, showing the key switch; from underneath, the exposed column wiring remains insulated (arrow, photograph #13). Photograph #14 is a top view of the steering column.

Photographs #15-17 are overall views of the engine compartment, while photographs #19-20 are taken of the engine block, also showing the fuel rail. In the engine compartment, the rubber belts and hoses are consumed, including the rubber hoses and tubing that were part of the fuel delivery and vapor recovery system. The vapor recovery canister has also completely burned. The steel fuel delivery lines remain in place, along with the metal components of the fuel rail. From the auto's left side, the arrows in photograph #18 point to the serrated ends of the steel delivery lines and fuel rail tube, where the rubber flex lines are no longer present. Between the fuel rail, the crossover flex lines are also totally consumed.

The battery was mounted at the engine compartment's right-front corner, and the battery has burned and melted down to its metal plates - see photograph #21. Photograph #22 is a better view of the now bare stranded copper battery cables. These battery cables exhibit no signs of electrical arcing.

I traced out the stranded copper wiring bundles running through the engine compartment, plus the exposed wiring bundles passing through the dashboard area, and observed no signs of electrical arcing - no copper beading or fusing was present. Within the dashboard's far-right end, the exposed wiring bundles are bare of insulation and broken off - these stranded copper wires are brittle and tarnished. Photographs #23-24 are two views of these bare, tarnished wire sections, taken from above the dashboard and through a firewall opening. Photographs #25-26 are closeups of these broken wire ends; the wires exhibit no copper beading or fusing. Perhaps, their brittle and tarnished condition can be

State Farm Insurance Company
November 27, 2000
Page 3

attributed to refrigerant exposure, from the air conditioner, that discharged during the fire.

The motor oil and transmission dipsticks have remained in place, and still register measurable fluid levels.

Earlier, photograph #7 was taken of the manufacturer's label, affixed along the edge of the left-front door. Checking the National Highway Traffic Safety Administration website (www.safercar.gov), I found no recall notices or technical service bulletin entries concerning fuel delivery line or fuel rail failure for this model vehicle.

Conclusion:

A fire occurred in the Eaves 1993 Lincoln Towncar, that started inside the engine compartment, burning the engine block and attached components, then leaving scorch marks on the compartment walls and surrounding body - the engine hood has melted down. The fire spread into the passenger compartment, burning the seats, dashboard moulding and other interior finish - the front windshield and three of the four door windows are broken out.

In the engine compartment, the rubber belts and hoses are consumed, including the rubber hoseing (flex line and tubing) that were part of the fuel delivery lines, fuel rail crossovers and the vapor recovery. On the incoming steel delivery lines and fuel rail stubs, I found no remnants of the rubber flex lines.

I examined the auto's electrical system, starting at the battery remains, checking the battery cables, then tracing out the wiring bundles running through the engine compartment and dashboard areas. I observed no signs of electrical arcing or shorting - the bare stranded copper wires exhibit no beading or fusing.

To summarize, based upon my investigation, I am of the opinion that the fire in the Eaves Lincoln Towncar started in the engine compartment, and further, I believe this fire was likely the result of a fuel leak, at a rubber hose, either on the fuel delivery lines or between the fuel rail.

In closing, if you have any questions concerning my investigation or this report, then please do not hesitate to contact me.

Respectfully submitted,

DUNN LABORATORIES, INC.

TIM C. DUNN, P.E.

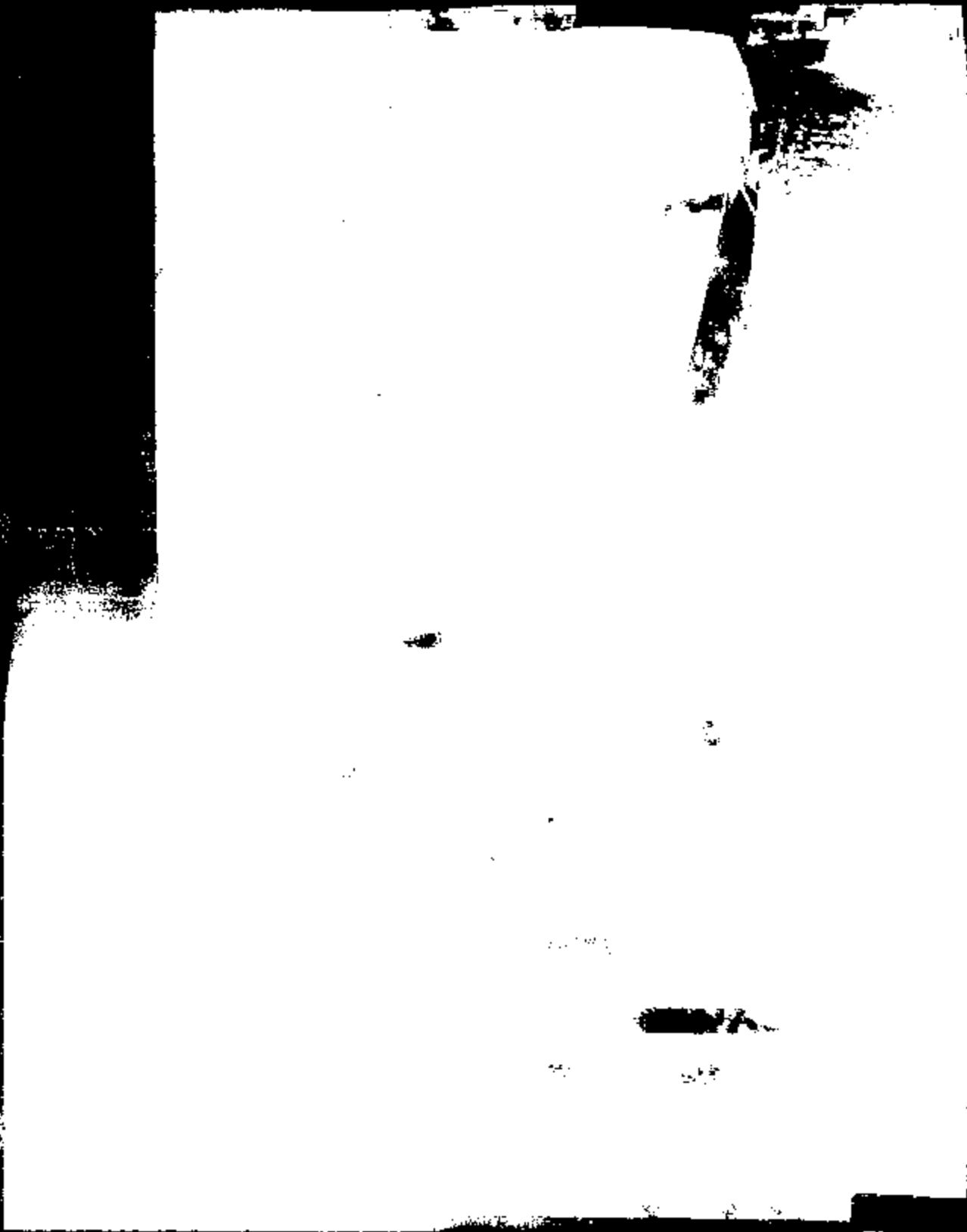
Email: timdunn@mindspring.com

PHOTOGRAPH DESCRIPTION SHEET

Eaves Automobile Fire Loss

1. Overall view of this 1993 Lincoln Towncar, taken from the auto's front end
2. Rear view, showing the vehicle's left side
3. Another rear view, showing the auto's right side
4. View inside the passenger compartment, taken from the left-front door
5. Front seat and dashboard area, taken from the right-front door
6. Rear seat, taken from the left-rear door
7. Manufacturer's label, affixed to the left-front door
8. Top view of the dashboard remains
9. Another view of the dashboard area, showing the burned and melted down moulding at the instrument panel
10. Driver's seat, with arrows pointing to the fallen sun visor and rear view mirror
11. Right-front (passenger's) seat, with the arrow pointing to the sun visor
12. Right side view of the steering column, with the arrow pointing to the ignition switch
13. Steering column's underside, another view of the ignition switch - the arrow points to the still-insulated wiring
14. Top view of the steering column
15. Overall view of the engine compartment, taken from the auto's front end
16. Engine compartment, taken from the auto's right side
17. Engine compartment, taken from the auto's left side
18. Top view of the engine block and fuel rail, taken from the auto's left side: arrows point to the steel delivery line ends and fuel rail stubs
19. Another view of the engine block and fuel rail, taken from the auto's right side
20. Battery remains, at the engine compartment's right-front corner
21. Better view of the bare stranded copper battery cables
22. Bare, broken apart stranded copper wiring bundle within the dashboard's far right side - views from above the dashboard and through the firewall opening
- 23-24. Closeups of these bare and broken off stranded copper wires - the tarnished wires are brittle, but exhibit no copper beading or fusing
- 25-26. Closeups of these bare and broken off stranded copper wires - the tarnished wires are brittle, but exhibit no copper beading or fusing

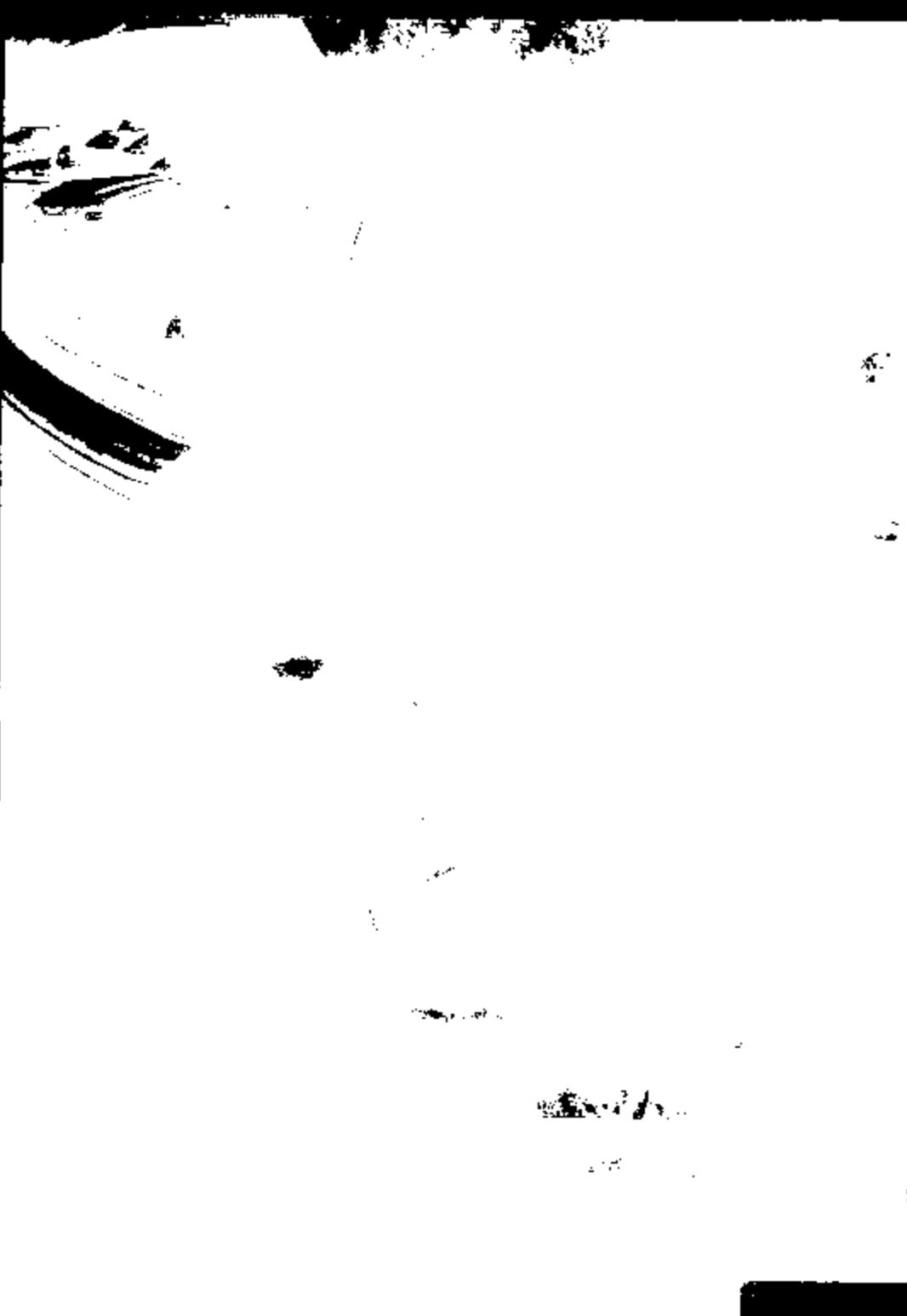
State Farm Insurance Company
November 27, 2000
Photograph Set



E982-825-B 11283

S
N
P

PRO2-325-8 11284



ENR2-625-B 11285

E F F

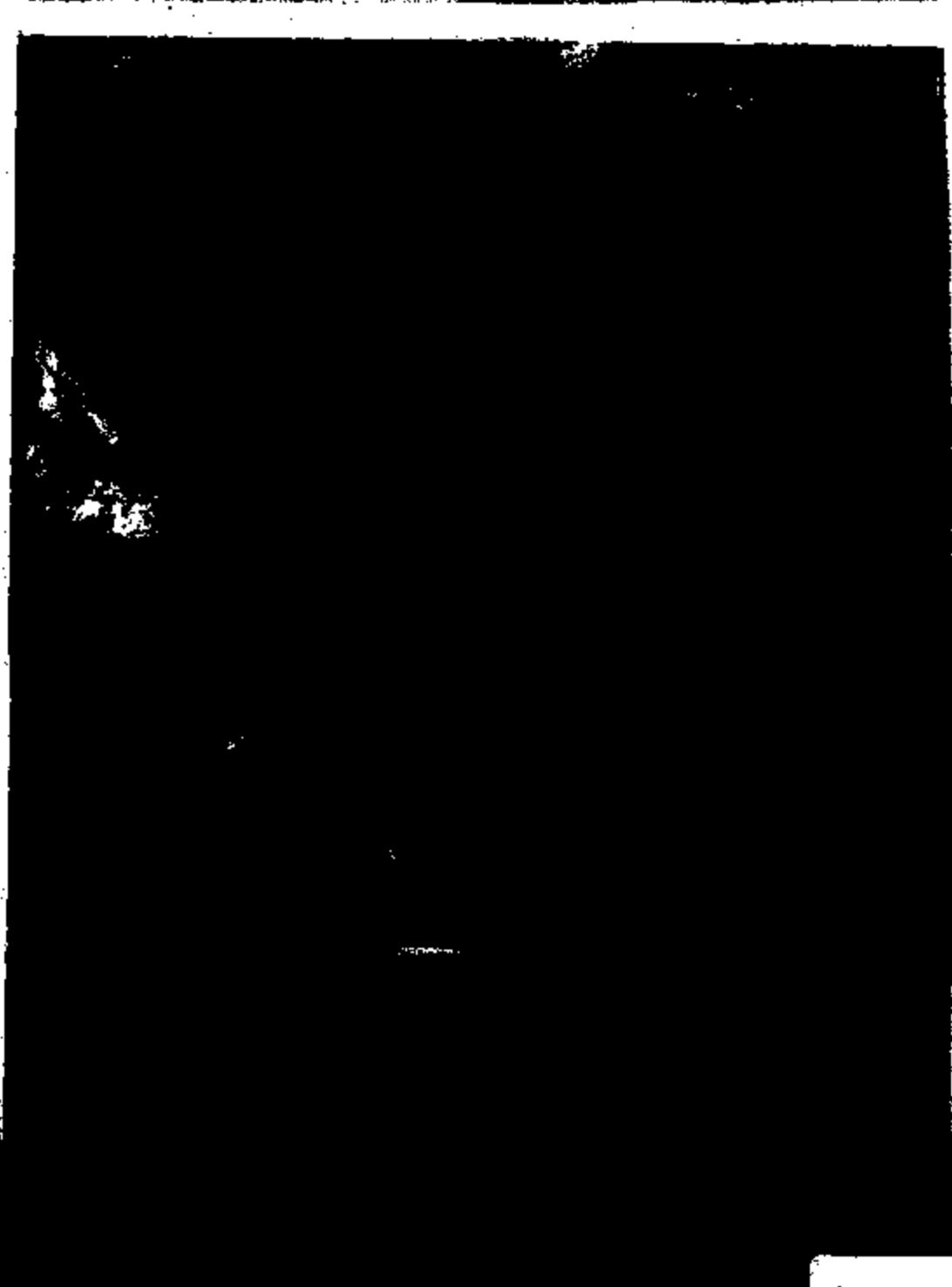


0002-025-B 11295

E F F

EP62-625-B 11297

REF



EAB2-025-B 11288

S P P

2002-025-5 11288



0002-025-5 11200

EE

2000-020-0 11201

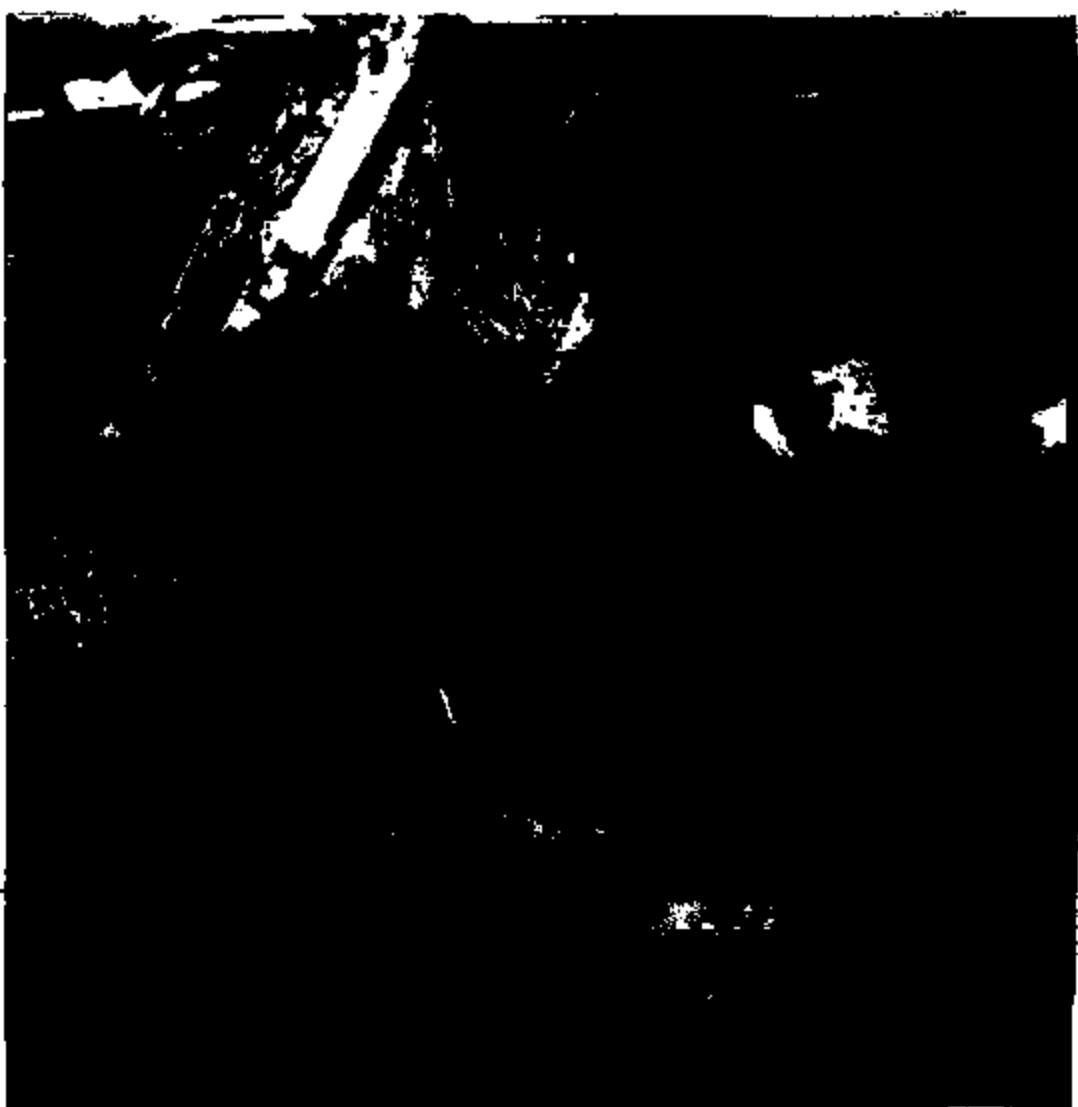
S P F

0902-020-3 11282

S P F



2000-025-0 11283



0002-028-8 11254



0962-928-5 11285

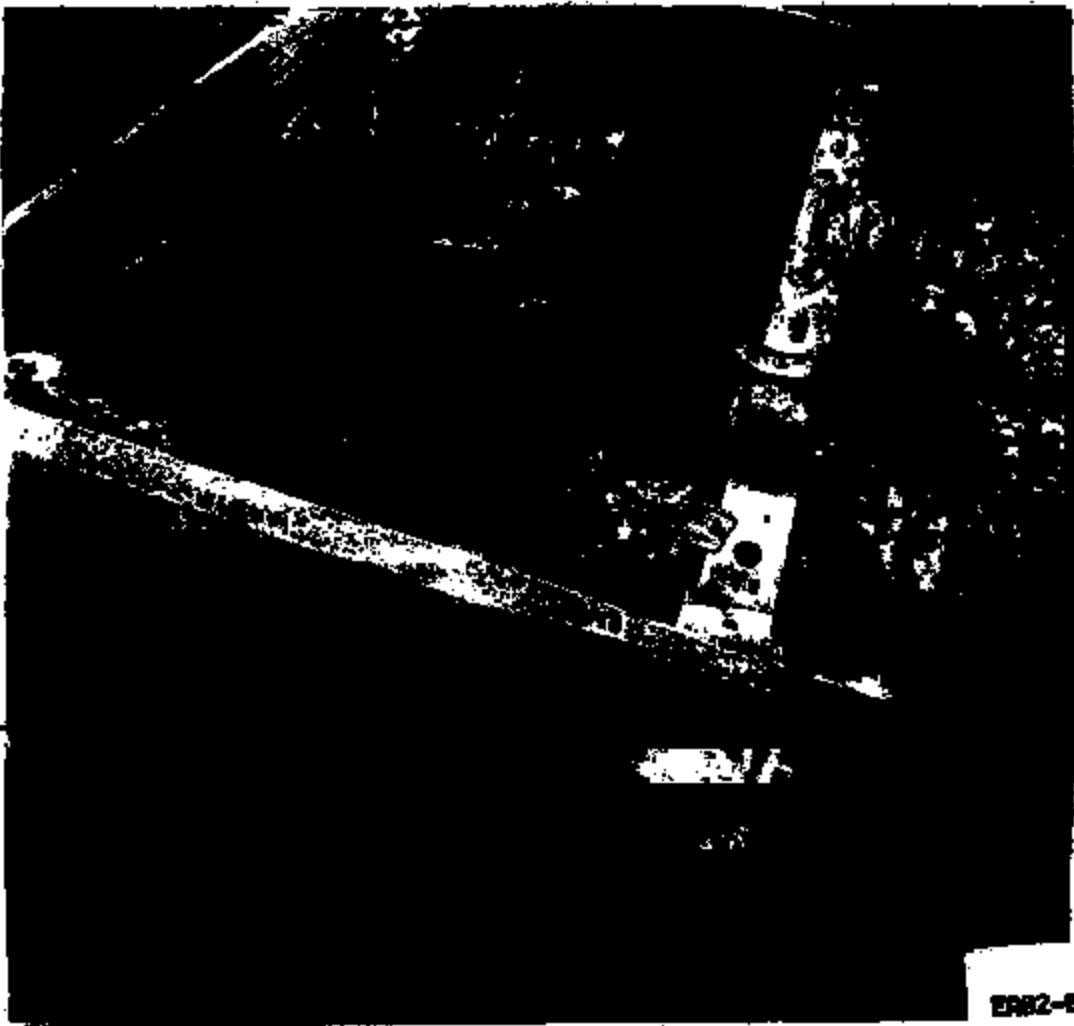


2002-028-0 31206

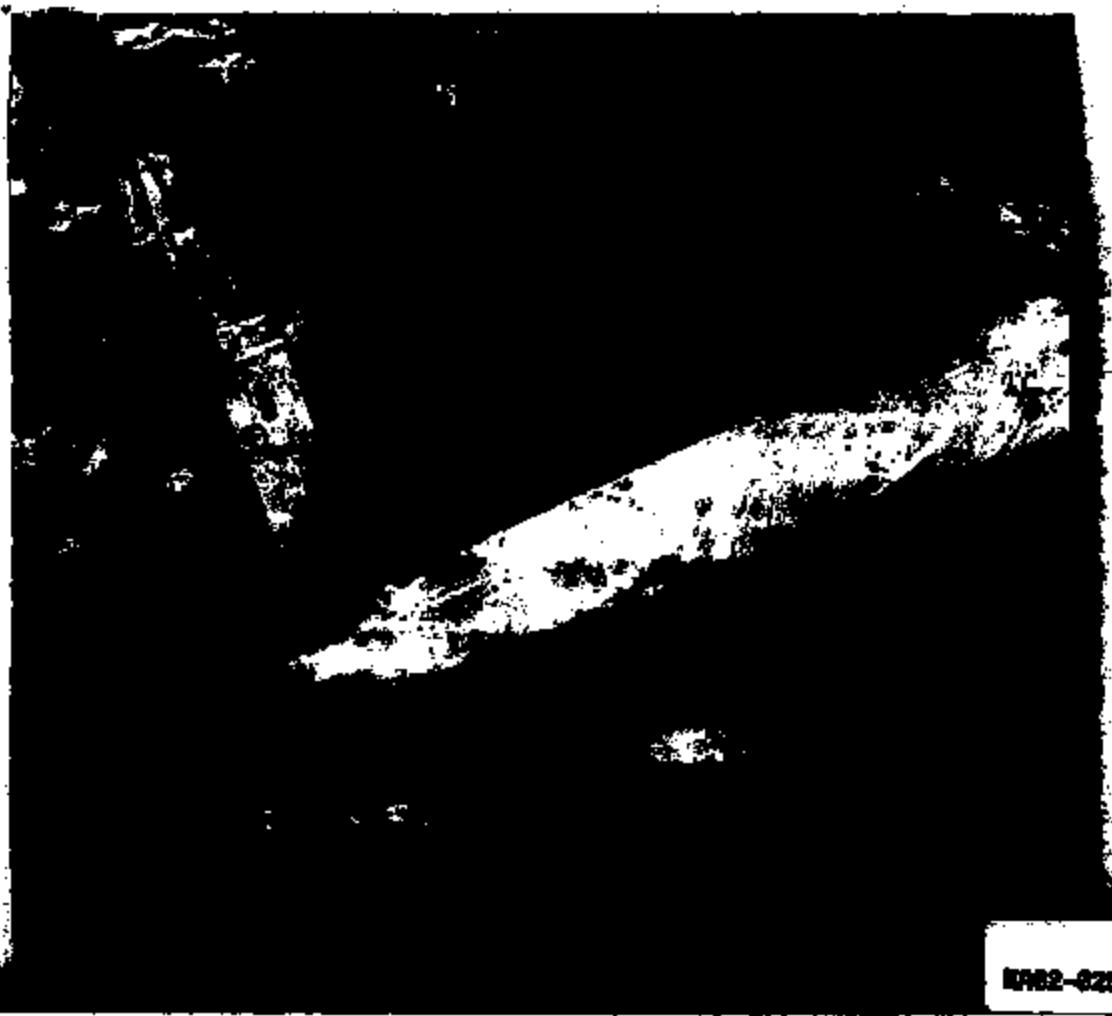
S A P



2002-020-0 11267



2002-025-5 11200



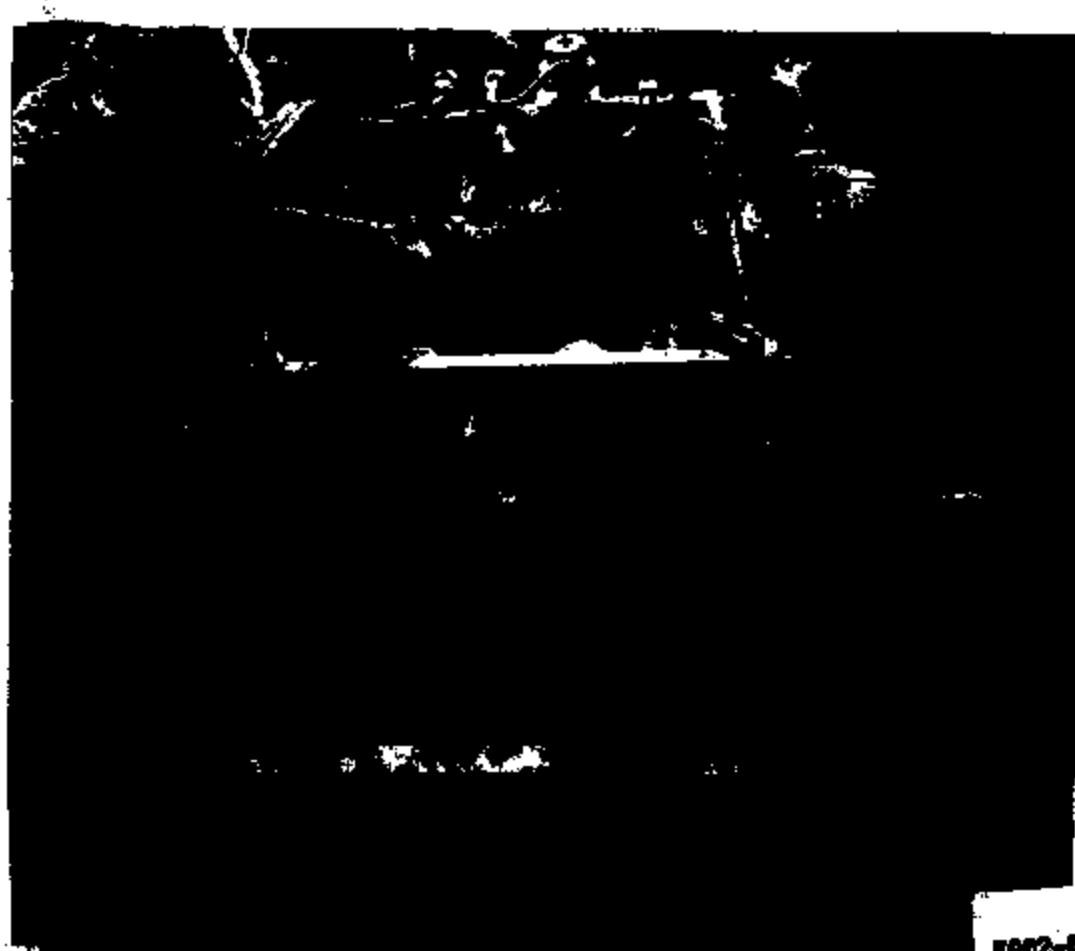
ME2-025-B 11200

S P P



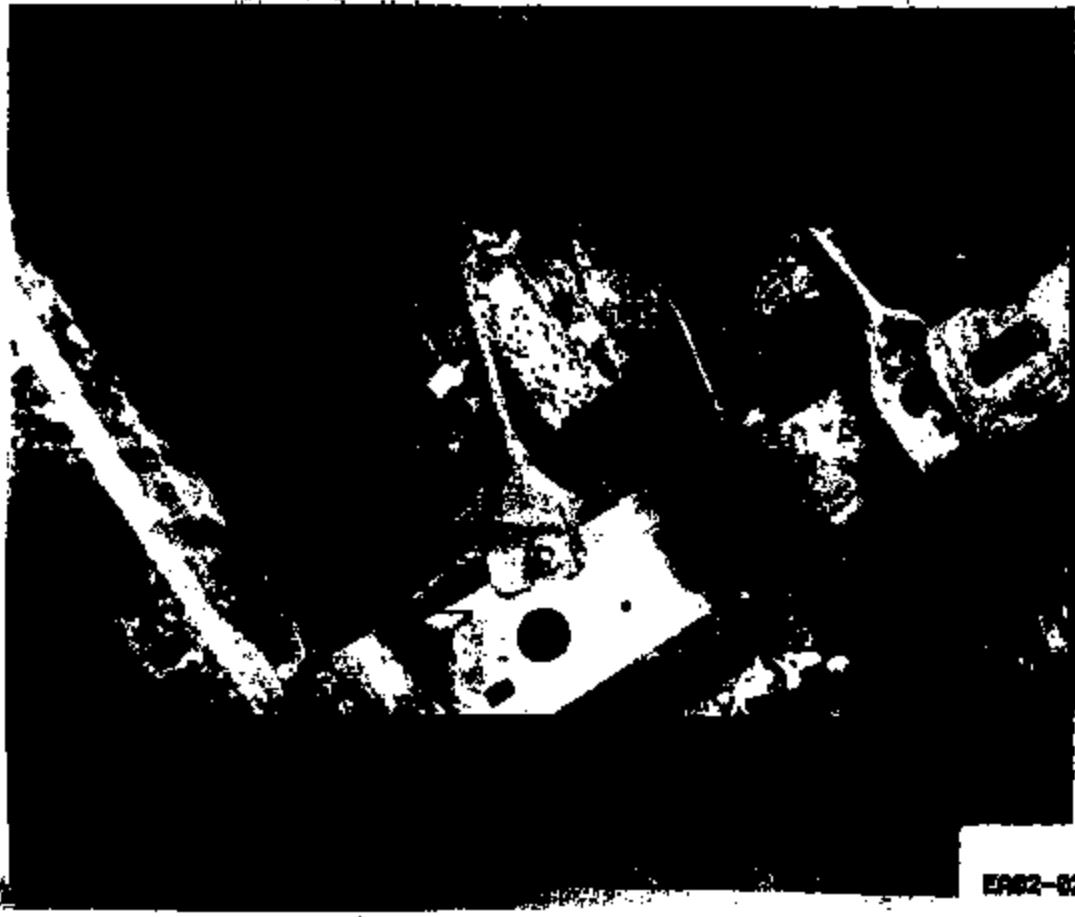
E982-828-B 11366

SECRET



SECRET 025-8 11381

PPF

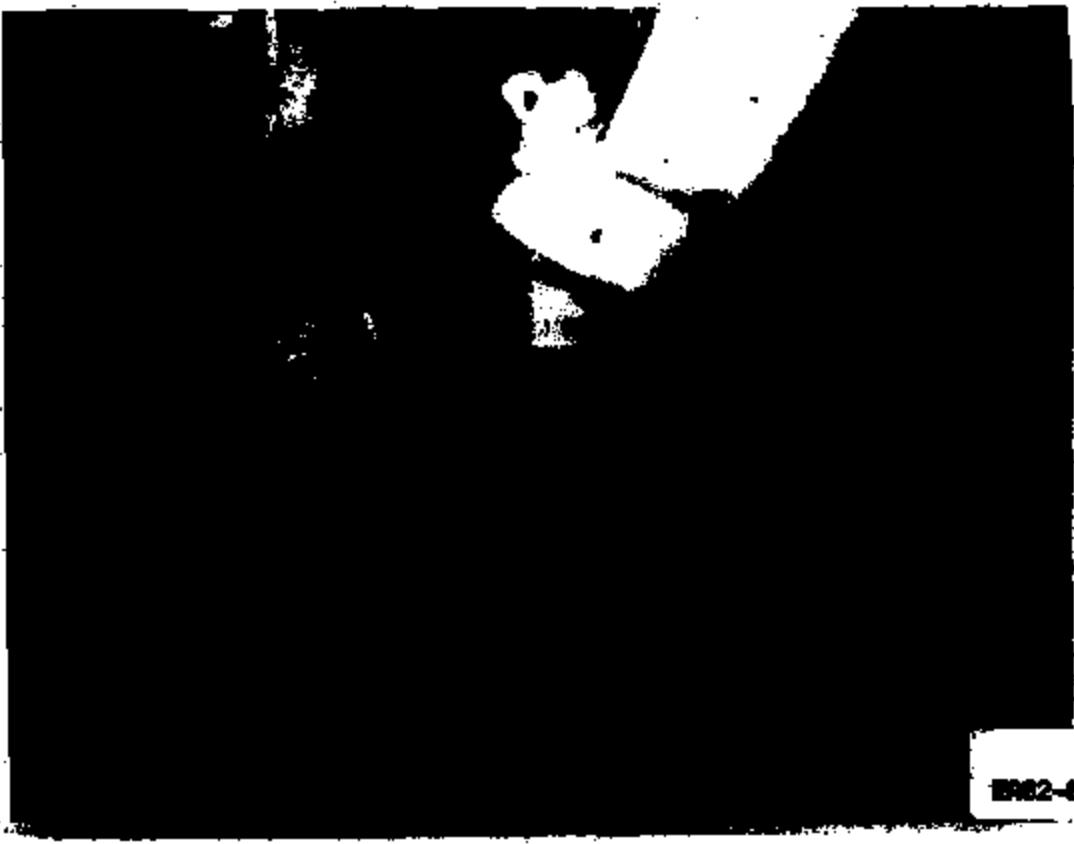


ER02-025-6 11362

6
F



6402-025-8 11383



8882-825-8 11364

E P F



5002-525-B 11365



2002-025-5 11386

MAP



2002-025-8 11387

Ch(6)

TX

2007-023 24045

Rio Grande City, Tx [REDACTED]

April 10, 2003

Certified Mail No. 70011940000305970408
Return Receipt Requested

FORD MOTOR COMPANY
RECEIVED

APR 16 2003

GRANADA, TEXAS
GENERAL AGENTS

CT Corporation Systems
Registered Agent for Ford Motor Company
350 N. Saint Paul Street
Dallas, Texas 75201

Re: Our Client: [REDACTED] REDACTED
Your Client: Ford Motor Company
Date of Loss: March 6, 2003 at 7:15 a.m.
Vehicle VIN No. 2FALP74W4RX134286, 1994 Ford Crown Victoria

Dear Sir/Madam:

On March 6, 2003, the Ford Crown Victoria purchased by my client was destroyed by fire. The fire fighters determined that the conflagration began in the engine compartment. It appears that the fire was caused by a faulty electrical system. The vehicle was parked in a garage adjacent to the [REDACTED] home. [REDACTED] lives at [REDACTED], Starr County, Texas.

The fire consumed the garage and its contents including irreplaceable antiques which were stored within. Family memorabilia in the form of generations of photographs including wedding pictures were completely burned...lost forever. Antique carpentry tools were also lost. The tools were handed down from generation to generation. The museum-class tools included block planes, hand saws, levels, pitch forks and framing squares of the type used by pioneer builders in South Texas. A list of my client's losses following the accident is inventoried in addendum number one.

We believe that a probable jury verdict in this case would not be less than \$50,000.00 and a probable verdict would be approximately \$100,000.00. In an effort to avoid the expenses and costs of trial, we are willing to accept and offer in the sum of \$35,000.00 in exchange for a full and final release from our client.

I looked forward to hearing from you regarding our proposal by April 28, 2003.

Sincerely,

OE: amf
XC [REDACTED]

AD PROVISIONAL INC.
V. FORD MOTOR COMPANY
CLAIM FILE 405494
JAMES Limber II



Vehicle: 1995 TOWN CAR Body: 4 DR SEDAN CARTIER Engine: 4.6L SOHC Cyls: 518JR00A
(ROMEO)
Trans: 4R70W 4 SPD AUTO Axle: AXLE CD: JY

There are no recalls associated with this vehicle

WARRANTY START DATE 08/28/1994

START ODOM

BUILD DATE 08/18/1994

Special Message: LESS THAN TWO DEALER APPROVED
AWA REPAIR VISITS PAID TO DATE

MORSE:

CODE: 759

USA 1994 NEW 72/075,000 PROMOTICARE

DED: \$50

ESF OWNER NAME: [REDACTED]

OPTIONS:

EXP DT 09/23/2000 & DIST 75,000 RMTL \$30 UP TO 5 DAYS TOWING \$45
CONTRACT SOLD BY: USA 11414

System Message:

NO REPAIR HISTORY ON VEHICLE

There are no ESR Parts associated with this request

End of OASIS report for 1LNLN1EW08Y601795

E982-025-3 6861

Vehicle Information Report

GENERAL VEHICLE INFORMATION:
(Related Claims)

VIN: 1HNLME3W5Y501795 Vin Line: CVB - TOWN CAR (PNGLPN116) [91-97] Eng Serial No.: *
 Model Year: 1995 Market District: GM - L-M DIVISION DERIVATIVE Body Style: *
 Vin Type: C Drive Code: GM - 2 WEL LAT REAR DRIVE Engine: GMN - GM 4.6L SOHC INTNA CIVS GMP
 Inv. Dealer: 11414 Body Cab Style: GMG - 4 DOOR SEDAN-6 LITE Transmission: GMU - 4 SPD AUTO TR. NANO AOD/EML/OW
 Vehicle Miles: GMG - GMTRK VER8KIN

BUILD INFORMATION:

Region: NA - MICHIGAN Plant: GM - WIXOM PLANT BUILD
 Country: USA - UNITED STATES Prod Date: 18-AUG-1994

SALE INFORMATION:

Region: NA - MICHIGAN Selling Dealer: 347111 - *
 Country: USA - MICHIGAN Selling Div: GM/Prov: TX
 Buyer DivProv: TX
 Arrival Date: 01-SEP-1994 Red Carpet Lease: *
 Sale Date: 23-SEP-1994 Fleet/MaintainCo. Lease #: *
 Warranty Start Date: 23-SEP-1994 Modified Vehicle: *
 Only Warranty Date: 23-SEP-1994 Enclosed Vehicle: * Vehicle Export Reg: N

VOC/ROD:

1	2	3	4	5	6	7	8	9
1HNLME3W5Y501795 A 3	3 0127487	MF 2	TEST 200A	3 12	A T	470111 2 10	10	11
10000 5 F 7000 700								

72000 9-22-2000

INSTALLED OPTION INFORMATION:

Air Conditioning	C/C - ATC AIR CONDITIONER	CVW Code	*
Alternator Amp Rating	* - [NA]	CVW Class Code	L
Audio Discs	* - [NA]	Instrumentation	* - [NA]
Axis Ratio	8.94:1 - 3.98 FINAL DRIVE RATIO	Mirror(Driver Side)	* - [NA]
Axis Type	BSAB - NON-LIMITED SLIP REAR AXLE	Mirror(Passenger Side)	* - [NA]
Battery Amp Rating	72	Paint	TMADIA - IVORY TRI-COAT
Brown Code	* - [NA]	Power Antenna	* - [NA]
Brown Code(Options)	* - [NA]	Radio	RF - BLU LIGHTING SIGNAL STRAIGHT
Coloration Code	SILVERIA	Sound System	* - [NA]
Color(Accent)	* - [NA]	Steering Tension Adjust	* - [NA]
Color(Tinted)	000AR -	Tire Brand	AJ - MICHELIN TIRE VENDOR
Delivery Type	S	Tire Size	050TQ - P225/60R-16 VSW
DriverSide Code	*	Traction Control	AB - ANTI-SPIN TRACT BRAKES W/O IVD
Front Disk	* - [NA]	Wheel Base	* - [NA]
Fuel Type	* - [NA]		

ESP INFORMATION: EMISSIONS INFORMATION:

ESP Code	K	Emissions Code	CNS-CNS
ESP Coverage(Miles)	075	Emissions Cert Type	P
ESP Coverage(Tires)	072	Emissions Doc Statistic	LZM
ESP Fins Year	1994	Engines Family	EP4679CPA
ESP Signature Date	27-03-1994		

Any comments? You can contact



STANDARD CLAIMS LIST

AWS Online Report

Run Date: 18-NOV-1999

Note: All Costs are in US Dollars

ILNLM3EWRSY601795	VB	CVB	CM	CFC	CBS	CB	BA	CDU	CVN	18-09-94	23-09-94	367111	USA	3	Q30	7W04	*	PKP	*	300	V30	NP		
AWS Claim Key:	455101	Date R:	094501	Tix Code:	1			Labor Hrs:	1		Labor Cost:	0			Material Cost:	0		Total Cost:	53.87					
Re-CI-Sub Cr:	11414-	Name:	NORTH HILLS L-M SALES INC				Plz:	817-3574488	St: TX	City: Cpl	USA			Reg Ctr:	NA		Expr Date:	23-NOV-1994		Dest IP:	601568			
Cost Comments:	1000 MPH RS SERVICE																							
ILNLM3EWRSY601795	VB	CVB	CM	CFC	CBS	CB	BA	CDU	CVN	18-09-94	23-09-94	367111	USA	8	Q30	7W04	*	15K501	*	306	V87	L20		
AWS Claim Key:	275421	Date R:	103441	Tix Code:	1			Labor Hrs:	.7		Labor Cost:	37.71			Material Cost:	0		Total Cost:	37.71					
Re-CI-Sub Cr:	11414-	Name:	NORTH HILLS L-M SALES INC				Plz:	817-3574488	St: TX	City: Cpl	USA			Reg Ctr:	NA		Expr Date:	09-MAY-1995		Dest IP:	601568			
Cost Comments:	KEYLESS ENTRY REMOTE INOP WILL NOT OPEN DOORS																							
Tech Comments:	KEYLESS ENTRY REMOTE INOP TEST AND REPROGRAMMED REMOTE KEYLESS ENTRY WORKS FINE																							
ILNLM3EWRSY601795	VB	CVB	CM	CFC	CBS	CB	BA	CDU	CVN	18-09-94	23-09-94	367111	USA	5	*	*	*	*	*	300	V08	*		
AWS Claim Key:	275422	Date R:	103441	Tix Code:	99812	Labor Hrs:	5			Labor Cost:	45.45			Material Cost:	1.49		Total Cost:	53.96						
Re-CI-Sub Cr:	11414-	Name:	NORTH HILLS L-M SALES INC				Plz:	817-3574488	St: TX	City: Cpl	USA			Reg Ctr:	NA		Expr Date:	09-MAY-1995		Dest IP:	601568			
Cost Comments:	RECALL 99812 FUEL GROWD																							
ILNLM3EWRSY601795	VB	CVB	CM	CFC	CBS	CB	BA	CDU	CVN	18-09-94	23-09-94	367111	USA	14	Q47	7H11	P9VY	19C306	A	312	V79	CIS		
AWS Claim Key:	329612	Date R:	1974894	Tix Code:	150	Labor Hrs:	2.3			Labor Cost:	132.19			Material Cost:	61.35		Total Cost:	213.54						
Re-CI-Sub Cr:	11467-	Name:	MAC CHURCHILL LINCOLN INC				Plz:	817-3674600	St: TX	City: Cpl	USA			Reg Ctr:	NA		Expr Date:	18-OCT-1995		Dest IP:	601553			
Cost Comments:	A-C NOT COOLING																							
Tech Comments:	ATC DIAG, A-C CHARGE, TEST EVAC, EXCHANGE, TEST EVAP CORE REPLACE ACCUMULATOR ASY, REPLACE ORIFICE AND REPL. O-RINGS																							
ILNLM3EWRSY601795	VB	CVB	CM	CFC	CBS	CB	BA	CDU	CVN	18-09-94	23-09-94	367111	USA	23	Q22	6L25	P9VY	5494HD70	C	300	V71	B61		
AWS Claim Key:	1256331	Date R:	2681314	Tix Code:	154	Labor Hrs:	.7			Labor Cost:	56.27			Material Cost:	190.24		Total Cost:	246.61						
Re-CI-Sub Cr:	11487-	Name:	MAC CHURCHILL LINCOLN INC				Plz:	817-3674600	St: TX	City: Cpl	USA			Reg Ctr:	NA		Expr Date:	11-OCT-1995		Dest IP:	601551			
Cost Comments:	SOP INSTRUMENT PANEL STRESS CRACKED ABOVE STEERING COLUMN PIN																							
Tech Comments:	LUGGAGE BACK, TAPETRIM DECALS APPEARANCE W/T REPLACED FRONT PANEL PIN																							

1LNLMOUW6Y501795 VB C/VB CRM CPC CMS OS BA CDU CVN 10-00-94 23-00-94 367111 USA 25 Q45 TM46 * 18004 * S22 V81 AIS
 AWS Claim Key: 1233282 Doc #: 26913102 Inv Order: BIS Labor Hrs: 1.2 Labor Cost: 65.61 Material Cost: 0 Total Cost: 65.61
 Mr. Cr-Sale CR: 11467 Name: MAC CHURCHILL
 LIND-MAC INC FAX: 813-36746998 Sta: DK City: USA Reg/Cat: NA Expr Date: 11-OCT-1996 DART/PMR#15914
 Case Comments: CUSTOMER STATES RADIO WORKS @ MM SENTINEL /
 Tech Comments: PCB CHECKS OK. POSSIBLE LOOSE CONNECTION ON REAR CONTROL UNIT SENTINEL YARD 26913102 W/BUMPER, 02 BIS AI IN45Q20H75

Any comments? You can contact:

macchurchill

Claim Detail Report

Note: All costs are in US dollars
 Model Year = 1995; Claim Key = 455191

Vehicle Information

Model Year: 1995
 Market Derived: C/M - L-M DIVISION DERIVATIVE
 Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE
 Version/Series: C/BS-CARTIER VERSION
 Drive Type: C/B-2 WHL L/H REAR DRIVE
 Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]
 Warranty Start Date: 23-SEP-1994
 Production Date: 18-AUG-1994
 VIN: 1LNLM23W0SY601795

Dealer Information:

Dealer Name: NORTH HILLS L-M SALES INC
 Dealer Code: 11414 - *
 Address: *
 City: HURST
 State: TX Zip Code: 76053
 Country: USA Region Code: NA
 Phone: (817)595-4488

Cust. Concern Code: N94 -
 Condition Code: 82 - FREIGHT/POSTAGE/MAINTENANCE

Technician Comment:

Customer Comment: 1000 MILES SERVICE

Claim Information

Document Number: 094521
 Repair Date: 23-NOV-1994
 Distance: 1503
 TTS: 3

Expense Information

Customer Paid Amount: 0
 Deductible Amount: 0
 Dealer Paid Amount: 0
 Labor Cost: 0
 Misc. Expense Amount: 53.87
 Part Markup Amount: 0
 Material Cost: 0
 Total Cost Gross: 53.87

A Detail

Labor Op Code Labor Op Description Labor Op Cost

PREP REPLACE 0

Control	Full Part Number	Part	Part Extended		
Flag	CPSC	Description	CPSC	Quantity	Amount
Y	* PREP *	1000 MILE POST-DLVRY 000001	0	0	

Any comments? You can contact:



7000 8-020-000

Claim Detail Report

Note: All costs are in US dollars

Model Year = 1995; Claim Key = 2734921

Vehicle Information

Model Year: 1995
 Market Derived: C/M - L-M DIVISION DERIVATIVE
 Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LSTE
 Version/Series: C/BS-CARTIER VERSION
 Drive Type: C/B-2 WHL L/H REAR DRIVE
 Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]
 Warranty Start Date: 23-SEP-1994
 Production Date: 18-AUG-1994
 VIN: 1LNLM83W0SY601795

Dealer Information:

Dealer Name: NORTH HILLS L-M SALES INC
 Dealer Code: 11414 - *
 Address: *
 City: HURST
 State: TX Zip Code: 76053
 Country: USA Region Code: NA
 Phone: (817)595-4488

Claim Information

Document Number: 1055461
 Repair Date: 09-MAY-1995
 Distance: 5043
 TIS: 8

Expense Information

Customer Paid Amount: 0
 Deductible Amount: 0
 Dealer Paid Amount: 0
 Labor Cost: 37.71
 Misc. Expense Amount: 0
 Part Markup Amount: 0
 Material Cost: 0
 Total Cost Gross: 37.71

F0850 00000000000000000000000000000000

A Detail

Cust. Concern Code: L20 - REMOTE/KEYLESS ENTRY TROUBLES

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: KEYLESS ENTRY REMOTES INOP TEST AND REPROGRAMMED REMOTES KEYLESS ENTRY WORKS
FINE>

Customer Comment: KEYLESS ENTRY REMOTE INOP WILL NOT OPEN DOORS>

Labor Op Code	Labor Op Description	Labor Op Cost
1400ID	KEYLESS ENTRY SYSTEM DIAGNOSIS	26.94
M		10.77

Cancel	Full Part Number	Part	Part Extended	
Flag	Description	OPSC	Quantity	Amount
Y	* 15K601 *	TRANSMITTER REM/CNTL	150602	0 0

Any comments? You can contact



Claim Detail Report

Note: All costs are in US dollars

Model Year = 1995; Claim Key = 2734920

Vehicle Information

Model Year: 1995
 Market Derived: C/M - L-M DIVISION DERIVATIVE
 Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LITE
 Version/Series: C/BS-CARTIER VERSION
 Drive Type: C/B-2 WHL L/H REAR DRIVE
 Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]
 Warranty Start Date: 23-SEP-1994
 Production Date: 18-AUG-1994
 VIN: 1LNLM83W0SY601795

Claim Information

Document Number: 1055441
 Repair Date: 09-MAY-1995
 Distance: 5043
 TIS: 8

Dealer Information:

Dealer Name: NORTH HILLS L-M SALES INC
 Dealer Code: 11414 - *
 Address: *
 City: HURST
 State: TX Zip Code: 76053
 Country: USA Region Code: NA
 Phone: (817)595-4488

Expense Information

Customer Paid Amount: 0
 Deductible Amount: 0
 Dealer Paid Amount: 0
 Labor Cost: 48.48
 Misc. Expense Amount: 5.39
 Part Markup Amount: .6
 Material Cost: 1.49
 Total Cost Gross: 55.96

Cost Concern Code: * -

Condition Code: * -

Technician Comment:

Customer Comment: RECALL 95S12 FUEL GROU(MNT>

Detail

Labor Op Code Labor Op Description Labor Op Cost

95S12B REPLACE 48.48

Cancel	Full Part Number	Part	Part Extended
Flag	Part Description	CPSC	Quantity Amount
N	* N806190 S1901	NANANA	1 .51
N	F4ZZ 9072 A SEAL-FUEL TNK FILLER	NANANA	1 .98

Any comments? You can contact:



webmaster

6262-6262-8 8811

Claim Detail Report

Note: All costs are in US dollars
 Model Year = 1995; Claim Key = 5240853

Vehicle Information

Model Year: 1995
 Market Derived: C/M - L-M DIVISION DERIVATIVE
 Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE
 Version/Series: C/B8-CARTIER VERSION
 Drive Type: C/B-2 WHL L/H REAR DRIVE
 Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]
 Warranty Start Date: 23-SEP-1994
 Production Date: 18-AUG-1994
 VIN: 1LNLM83W08Y601795

Claim Information

Document Number: 19746901
 Repair Date: 18-OCT-1995
 Distance: 9358
 TBS: 14

Dealer Information:

Dealer Name: MAC CHURCHILL LINC-MERC INC
 Dealer Code: 11467 - *
 Address: *
 City: FORT WORTH
 State: TX Zip Code: 761213049
 Country: USA Region Code: NA
 Phone: (817)367-4000

Expense Information

Customer Paid Amount: 0
 Deductible Amount: 0
 Dealer Paid Amount: 0
 Labor Cost: 132.19
 Misc. Expense Amount: 0
 Part Markup Amount: 24.54
 Material Cost: 61.35
 Total Cost Gross: 218.08

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

Condition Code: 49 - CONTAMINATED/FOREIGN

Technician Comment: ATC DIAG., A-C CHARGE, TEST EVAC. RECHARGE, TEST EVAP CORE REPLACE ACCUMULATOR ASSY. REPLACE ORIFICE AND REPL. O-RINGS

Customer Comment: A-C NOT COOLING

Labor Op Code	Labor Op Description	Labor Op Cost
19700D	AUTOMATIC TEMPERATURE CONTROL (ATC) DIAGNOSIS	26.44
19700A	PRESSURIZE, LEAK TEST, DISCHARGE, EVACUATE AND CH DIAGNOSES	37.01
19700C	EVAPORATOR CORE LEAKAGE TEST DIAGNOSIS	26.44
19700A18	ACCUMULATOR ASSEMBLY-AIR CONDITIONER REPLACE	15.86
19700A17	ORIFICE - AIR CONDITIONER EVAPORATOR CORE REPLACE	5.29
19700A3T	O-RING(S) OR O-RING KIT REPLACE	21.15

Causal	Full Part Number		Part	Extended	
Flag	ITEM BASED SUB	Description	CPSIC	Quantity	Amount
Y	F4VY 19C836	A ACCUMULATOR/HOSE	1203G3	1	32.49
N	F3KY 19D990	A ORIFICE-EXPANSION	1203XX	1	1.38
N	F2AZ 19577	AC A/C COMPRESSOR OIL	12XXXX	1	11.66
N	F3VY 19D690	A O RING-SEAL A/C CPLG	000000	1	3.66
N	YN 16 *		190101	38	12.16

Any comments? You can contact:



Webmaster

1992-929-3 885

Claim Detail Report

Note: All costs are in US dollars
 Model Year = 1995; Claim Key = 12565325

Vehicle Information

Model Year: 1995
 Market Derived: C/M - L-M DIVISION DERIVATIVE
 Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LITE
 Version/Series: C/BS-CARTIER VERSION
 Drive Type: C/B-2 WHL L/H REAR DRIVE
 Vehicle Line: C/VB-TOWN CAR (PN36/PN116) [91-97]
 Warranty Start Date: 23-SEP-1994
 Production Date: 18-AUG-1994
 VIN: 1LNLM83W0SY601795

Claim Information

Document Number: 26013101
 Repair Date: 11-OCT-1996
 Distance: 15515
 TIS: 23

Dealer Information:

Dealer Name: MAC CHURCHILL LINC-MERC INC
Dealer Code: 11467 - *
Address: *
City: FORT WORTH
State: TX Zip Code: 761213049
Country: USA Region Code: NA
Phone: (817)367-4000

Expense Information

Customer Paid Amount: 0
 Deductible Amount: 0
 Dealer Paid Amount: 0
 Labor Cost: 38.27
 Misc. Expense Amount: 0
 Part Markup Amount: 76.1
 Material Cost: 190.24
 Total Cost Gross: 304.61

Cust. Concern Code: B81 - TEARS, SNAGS, CRACKS - IP/DASHBOARD

Condition Code: 01 - BROKEN/CRACKED

Technician Comment: LUGGAGE RACK,TAPESTRYPE DECALS APPEARANCE FIT REPLACED FINISH PANEL FSN

Customer Comment: SOP INSTRUMENT PANEL STRESS CRACKED ABOVE STEERRING COLUMM FSN

Detail

<u>Labor Op Code</u>	<u>Labor Op Description</u>	<u>Labor Op Cost</u>
04470A	FINISH PANEL-INSTRUMENT CLUSTER REPLACE	38.27

Crusad	Full Part Number	Part	Part	Extended
Elas:	FREE BASE SUITE	Description	CPSC	Quantity Amount
Y	P5VY 54044D70	C PANEL-INST CLUS OP R 011201	1	190.24

Any comments? You can contact



webmaster

6708 0-920-7220

Claim Detail Report

Note: All costs are in US dollars
Model Year = 1995; Claim Key = 12592942

Vehicle Information

Model Year: 1995
Market Derived: C/M - L-M DIVISION DERIVATIVE
Body/Cab Type: C/F/C - 4 DOOR SEDAN-6 LITE
Version/Series: C/BS-CARTIER VERSION
Drive Type: C/B-2 WHL L/H REAR DRIVE
Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]
Warranty Start Date: 23-SEP-1994
Production Date: 18-AUG-1994
VIN: 1LNLM83W0SY601795

Claim Information

Document Number: 26013102
Repair Date: 11-OCT-1996
Distance: 15515
TIS: 25

Dealer Information:

Dealer Name: MAC CHURCHILL LINC-MERC INC
Dealer Code: 11467 - *
Address: *
City: PORT WORTH
State: TX Zip Code: 761213049
Country: USA Region Code: NA
Phone: (817)367-4000

Expense Information

Customer Paid Amount: 0
Deductible Amount: 0
Dealer Paid Amount: 0
Labor Cost: 65.61
Misc. Expense Amount: 0
Part Markup Amount: 0
Material Cost: 0
Total Cost Gross: 65.61

12592942

Cost. Concern Code: A15 - TAPE PLAYER/CD TROUBLES

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: FCU CHECKS OK. POSSIBLE LOOSE CONNECTION ON REAR CONTROL UNIT SBN Y N / NN C 000NN
YA0SB26013102 WBUMPERS 01 E83 A11N45Q20N15

Customer Comment: CUSTOMER STATES RADIO INOP N @ NN SBN Y N /

<u>Labor Op Code</u>	<u>Labor Op Description</u>	<u>Labor Op Cost</u>
18805B	RADIO REMOVE	16.4
18805C	RADIO - AFTER REPAIR INSTALL	21.87
14200A	WIRING ASSEMBLY REPAIR	27.34

<u>Cancel</u>	<u>Full Part Number</u>	<u>Part</u>	<u>Part</u>	<u>Extended</u>
Flag	FREE BASE SHFT	Description	CPSC	Quantity Amount
Y	*	18306	*	CHASSIS RADIO 150105 0 0

Any comments? You can contact



CSCW140

VEHICLE DATA

11/18/99 10:21:00

-->

OWNER VIN --> 1LMLN83W0SY601795

NAME --> FAILS

ZIP --> [REDACTED]

MODEL YR -->

OWNER NAME : [REDACTED]

STREET ADDR : [REDACTED]

CITY : FORT WORTH

N/A YY-MM-DD 97-12-12

ST/PRV: TX CTRY:

ZIP/POSTAL CODE: 76132 N/A SOURCE: M

MODEL YEAR : 95 PLANT: Y

SALE YY-MM-DD 94-09-23

BODY STYLE DESC: 4 DOOR SEDAN CARTIER

PRODUCTION YY-MM-DD 94-08-18

VEHICLE DESC : 1995 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	67	I	111	51	52
FACING	3	67	I	111		
RESPONSIBLE	3	67	I	111		

CA EMISSION : ENGINE TAG CODE : 5G812AA CAMPAIGN COUNTS

NAVIS STATUS : 800 COMPANY CAR IND : TOTAL CAMPAIGNS : 02

DSO DISTRICT : FLEET CODE : OPEN : 00 CLOSED : 02

DSO NUMBER : FLEET STATUS : ACTIVE: 02 HISTORY: 00

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

OGDB079

571
572
573
574
575
576
577
578
579

CSCN150

CAMPAIGN VEHICLE INFORMATION

11/18/99 10:21:06

ENTER CAMPAIGN NUMBER--> 95812 VIN--> 1LNLM83W0SY601795 TYPE OF SEARCH: A
MODEL YEAR: 95 DEFECT: FT PIPE SEAL BODY STYLE: 4 DOOR SEDAN CARTIER

NEW STATUS CODE:

CAMP DIV : 6

REPAIR INFORMATION:

SUPP CODE :

REPAIR DATE: DEALER P/A: -

KIT CODE : AA

MICRO REF: CLAIM NUM: -

OASIS DATE : 95-04-05

DELETE REASON:

VENDOR M/A INFORMATION:

RESP DEALER INFORMATION: NEW:

IND: MATCH CODE: 2

CURRENT: 3 67 111 ASSIGNED: 97-12-15 SOURCE: PX EXTRACT DATE: 96-12-13

***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC

C COMPLETE 95-09-20 B 95-05-09 11414 105544 LIO1E5E AC

M RELEASED FOR MAILING 95-07-10

M RELEASED FOR MAILING 95-04-05

R READY TO RELEASE 95-03-27

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

CGDB079

0700 0800 0900 0930 1000 1030 1100 1130 1200 1230 1300 1330 1400 1430 1500 1530 1600 1630 1700 1730 1800 1830 1900 1930 2000 2030 2100 2130 2200 2230 2300 2330 2400 2430 2500 2530 2600 2630 2700 2730 2800 2830 2900 2930 3000 3030 3100 3130 3200 3230 3300 3330 3400 3430 3500 3530 3600 3630 3700 3730 3800 3830 3900 3930 4000 4030 4100 4130 4200 4230 4300 4330 4400 4430 4500 4530 4600 4630 4700 4730 4800 4830 4900 4930 5000 5030 5100 5130 5200 5230 5300 5330 5400 5430 5500 5530 5600 5630 5700 5730 5800 5830 5900 5930 6000 6030 6100 6130 6200 6230 6300 6330 6400 6430 6500 6530 6600 6630 6700 6730 6800 6830 6900 6930 7000 7030 7100 7130 7200 7230 7300 7330 7400 7430 7500 7530 7600 7630 7700 7730 7800 7830 7900 7930 8000 8030 8100 8130 8200 8230 8300 8330 8400 8430 8500 8530 8600 8630 8700 8730 8800 8830 8900 8930 9000 9030 9100 9130 9200 9230 9300 9330 9400 9430 9500 9530 9600 9630 9700 9730 9800 9830 9900 9930

CSCN150

CAMPAGNE VEHICLE INFORMATION

11/18/99 10:21:11

ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LMLM83W08Y601795 TYPE OF SEARCH: A
MODEL YEAR: 95 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN CARTIER

NEW STATUS CODE:

REPAIR INFORMATION: TYPE CODE:

REPAIR DATE: DEALER P/A: -

MICRO REF: CLAIM NUM: -

DELETE REASON:

RESP DEALER INFORMATION: NEW:

CURRENT: 3 67 111 ASSIGNED: 97-12-15 SOURCE: PX EXTRACT DATE: 96-12-13

***** STATUS INFORMATION: ***** ***** REPAIR INFORMATION: *****

CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC

F FORCED COMPLETION 98-01-22 B 98-01-22 AUTOC OL

M RELEASED FOR MAILING 97-02-07

H AWAITING MAILING 96-11-24

CAMP DIV : 6

SUPP CODE :

KIT CODE : CR

OASIS DATE :

VENDOR W/A INFORMATION:

IND: MATCH CODE: 2

DELETE REASON:

F1=INQUIRY F2=G140 F3=EXIT F5=G130 F7-FIRST F9=NEXT F9=MORE STATUS

F10=ADD STATUS F11=REVISE (ALL DATA FIELD DATES YY-MM-DD)

I037=NO MORE DATA TO DISPLAY

OGOB079

5002-500-5 5002

CSCN150

CAMPAIGN VEHICLE INFORMATION

11/18/99 10:21:15

ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LMNB3W08Y601795 TYPE OF SEARCH: A
MODEL YEAR: DEFECT: BODY STYLE:

NEW STATUS CODE:

REPAIR INFORMATION:

TYPE CODE:

REPAIR DATE: _____

DEALER P/A: _____

MICRO REF: _____

CLAIM NUM: _____

CAMP DIV :

SUPP CODE :

KIT CODE :

OASIS DATE :

VENDOR N/A INFORMATION:

IND: MATCH CODE:

DELETE REASON:

RESP DEALER INFORMATION: NEW: _____

SOURCE: _____

EXTRACT DATE: _____

CURRENT: ASSIGNED: _____

***** 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

DEALER 67A 131

VIN 1CMAK29W09T501798

MANUFACTURE DATE

600007

SEARCH-ID #672000003 D ED AA

PRICE LEVEL 510015003 VEN 13000000001798

Buyer [REDACTED]

Car [REDACTED]

THE INSURER MAY NOT PAY THE FULL COST OF THE VEHICLE IF THERE IS A DEFICIENCY OF FUTURES INSURANCE AND/OR OTHER INSURANCE COVERS THE VEHICLE. THIS POLICY DOES NOT PROVIDE COVERAGE FOR LOSS TO SUPPORT REQUIREMENTS AND/OR OTHERS.					
AMOUNT	TYPE	AMOUNT	TYPE	AMOUNT	P/W

SELLER ROBERT KELLY L-N SALES INC P.O. BOX 487 SHAWNEE OK 74801	67A111 08/13/96 0034	SELLER ROBERT KELLY L-N SALES INC 3200 N BOONE CIR SHAWNEE OKLAHOMA OK 74801	67A111 08/13/96 0034	SELLER ROBERT KELLY L-N SALES INC 3200 N BOONE CIR SHAWNEE OKLAHOMA OK 74801	67A111 08/13/96 0034
67A111798 15-1003 10000000001798 THIS POLICY IS FOR THE EXCLUSIVE USE OF THE VEHICLE IDENTIFIED ABOVE. THIS POLICY IS NOT VALID FOR THE SALE OR LEASE OF THE VEHICLE.	67A111 08/13/96 0034	67A111 08/13/96 0034	67A111 08/13/96 0034	FORD MOTOR CREDIT 000001	67A111 08/13/96 0034

.00 NOT
DEALERS COPY

5002-625-B 0022

DEALER	VIN	AMOUNT
1995 TORE CAR CHARTER 4-DOOR PA. IVORY PERMAWHITE CC ME. 10V/2 SEDAN LWB HT SERVICE SW. 4.0L V6 16V 4WD, BLACK/WHITE XW90 G/D TRIM SLA. 102.0/102.0 165 ALL SEASON TIRES PAINT FINISHMENT - PALE-COAT 153 FRONT LICENSE PLATE BRACKET TOTAL VEHICLE & OPTIONS MANUFACTURER & DELIVERY	41200.00	36827.00
		<u>625.00</u>
TOTAL FOR VEHICLE	41825.00	

IS U.S. CAR CAR PROJECT
DEPARTMENT OF DEFENSE ADMINISTRATION
REF ID: 0073600003 D-3D PA
SCHOOL-B LEVEL: 00009
PRICE LEVEL: HIGHLEVEL
SHIPMENT NUMBER: 1297 LAR.
VIN: 1M1AB14417M

THE PURCHASE AND USE OF THIS VEHICLE IS IN VIEW OF THE POSSIBILITY OF FUTURE INTERNAL AUDITORS,
CONTROLS AND INSPECTORS CHECKING FOR DEFECTS OR DAMAGE TO THIS VEHICLE.
THE PURCHASER IS ADVISED THAT ALL REPORTS OF DEFECTS OR DAMAGE TO SUPPORT DOCUMENTS WILL BE WITHHELD.

AMOUNT	TYPE	AMOUNT	TYPE	AMOUNT	AMOUNT
41200.00	DEALER	1,000.00	OPTION	20.00	60.00
1044.00	STATE	.00	STATE	1044.00	1044.00

TO/TO NORTH KOREA L-N KALIN TIRI P.O. BOX 487 KALIN TE 76053	FROM/TO COUNTRY CODE TE 10100	PURCHASE DATE CODE TE 10100	EXPIRE DATE CODE TE 10100
SHIPPING INFORMATION			
TO/TO NORTH KOREA L-N KALIN TIRI 3005 KOREAN PEOPLE KOREAN PEOPLE TE 10100	FROM/TO COUNTRY CODE TE 10100	PURCHASE DATE CODE TE 10100	EXPIRE DATE CODE TE 10100
TERMS & CONDITIONS			

1120400396076037256 NICKEL STATE MOTOR CHEMIST 609002
THE INVOICE TO BE USED FOR THE PURCHASE OF VEHICLE ONLY

DEALER COPY

0002-023-3 6623

CSCN140

VEHICLE DATA

11/18/99 10:21:00

→ OWNER VIN → 1LNLM83W0SY601795
NAME → FAILS ZIP → [REDACTED] MODEL YR →
OWNER NAME [REDACTED]
STREET ADDR [REDACTED]

CITY : FORT WORTH
ST/PRV: TX CTRY: [REDACTED] N/A YY-MM-DD 97-12-12
MODEL YEAR : 95 PLANT: Y [REDACTED] N/A SOURCE: M
BODY STYLE DESC: 4 DOOR SEDAN CARTIER SALE YY-MM-DD 94-09-23
VEHICLE DESC : 1995 TOWN CAR PRODUCTION YY-MM-DD 94-08-18

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD	REGION
SHIP-TO	3	67	I	111	51		52
FACING	3	67	I	111			
RESPONSIBLE	3	67	I	111			

CA EMISSION : ENGINE TAG CODE : [REDACTED] CAMPAIGN COUNTS
NAVIS STATUS : 800 COMPANY CAR IND : TOTAL CAMPAIGNS : 02
DSO DISTRICT : FLEET CODE : OPEN : 00 CLOSED : 02
DSO NUMBER : FLEET STATUS : ACTIVE: 02 HISTORY: 00

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

OGDB079

CSCN150

CAMPAIGN VEHICLE INFORMATION

11/18/99 10:21:06

ENTER CAMPAIGN NUMBER--> 95S12 VIN--> 1LNLM83W0SY601795 TYPE OF SEARCH: A
MODEL YEAR: 95 DEFECT: FT PIPE SEAL BODY STYLE: 4 DOOR SEDAN CARTIER

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 : 95-04-05
DELETE REASON: VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 2
CURRENT: 3 67 111 ASSIGNED: 97-12-15 SOURCE: PX EXTRACT DATE: 96-12-13
***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC
C COMPLETE 95-09-20 B 95-05-09 11414 105544 LIOIESE AC
M RELEASED FOR MAILING 95-07-10
M RELEASED FOR MAILING 95-04-05
R READY TO RELEASE 95-03-27

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)

X037=NO MORE DATA TO DISPLAY

OGDB079

CSCN150

CAMPAIGN VEHICLE INFORMATION

11/18/99 10:21:11

ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LNLM83W0SY601795 TYPE OF SEARCH: A
MODEL YEAR: 95 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN CARTIER

NEW STATUS CODE:

CAMP DIV : 6

REPAIR INFORMATION: TYPE CODE:

SUPP CODE :

REPAIR DATE: DEALER P/A: -

KIT CODE : CK

MICRO REF: CLAIM NUM: -

OASIS DATE :

DELETE REASON:

VENDOR N/A INFORMATION:

RESP DEALER INFORMATION: NEW:

IND: MATCH CODE: 2

CURRENT: 3 67 111 ASSIGNED: 97-12-15 SOURCE: PX EXTRACT DATE: 96-12-13

***** STATUS INFORMATION: ***** ***** REPAIR INFORMATION: *****

CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC

F FORCED COMPLETION 98-01-22 B 98-01-22 AUTOC OL

M RELEASED FOR MAILING 97-02-07

H AWAITING MAILING 96-11-24

DELETE REASON:

F1-INQUIRY F2-G140 F3-EXIT F5-G130 F7-FIRST F8-NEXT F9-MORE STATUS

F10-ADD STATUS F11-REVISE (ALL DATA FIELD DATES YY-MM-DD)

I037-NO MORE DATA TO DISPLAY

OGDB079

CSCN150

CAMPAIGN VEHICLE INFORMATION

11/18/99 10:21:15

→ _____

ENTER CAMPAIGN NUMBER → 96L12 VIN → 1LNLM83W0SY601795 TYPE OF SEARCH: A
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)

X907-END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES

OGDB079

BOURLAND, KIRKMAN, SEIDLER & EVANS, L.L.P.

ATTORNEYS AND COUNSELORS
801 MAIN STREET, SUITE 1400
FORT WORTH, TEXAS 76108
1817 336-2600 METRO 429-0747
FACSIMILE 1817 277-1563

RICHARD L. BOURLAND, P.C.
WILLIAM L. KIRKMAN
DAVID R. SEIDLER
DAVID L. EVANS
JANETTE LIZZIE M. ZACH
LEWIS G. MELTON SPERBER

JAMES V. JAY IV
THOMAS N. MICHAEL
CLAUDINE T. GERMAIN
JENNIFER H. LITKE
HON. HAL N. LATIMORE, OF COUNSEL

January 19, 1998

Ma. Mary Skerington
Ford Motor Company
Office of General Counsel
Park Lane Towers West, Suite 400
3 Parklane Boulevard
Dearborn, Michigan 48126

Re: [REDACTED]

VIN #1LNLMR83W6SY601795

Dear Ma. Skerington:

On November 6, 1997, the enclosed DTPA was forwarded to Ford Motor Company regarding the above referenced matter. On January 14, 1998, I received a telephone call from Marianne of Ford Motor Company in the Litigation Prevention Department. She indicated that this matter, because is involved a subrogation claim, should be forwarded to your attention.

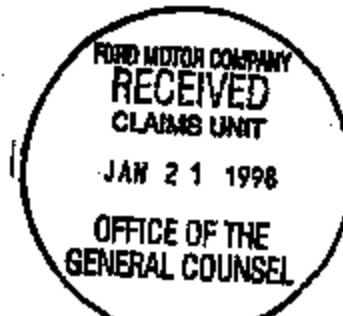
In addition, I have also enclosed for your information a copy of a correspondence to Michael A. Yonks, of North Hills Lincoln-Mercury Sales, Inc. This correspondence provides a more detailed account of the claim and the damages to my client's property. I have also provided substantial information, including repair invoices and auto valuations, to assist you in evaluating the damages which my client sustained as a result of his defective vehicle.

If any additional information is needed or if I can be of assistance to you, please do not hesitate to call. I am hopeful that we will be able to resolve this matter amicably without the need for additional litigation. I look forward to hearing from you shortly.

Sincerely yours,

Claudine Gre
Claudine Germain

CTG/ac
~~cc: [REDACTED]~~
Enclosures



405494 ED ✓

1802-028-5 6626

Office of the General Counsel

Ford Motor Company
Partitions Business West
Suite 300
Three Partitions Boulevard
Dearborn, Michigan 48126-2020

February 6, 1998

Claudine Germain
Bourland, Kirkman, Sakkier & Evans, L. L. P.
Attorneys and Counselors
201 Main Street, Suite 1400
Fort Worth, Texas 76102

Re: [REDACTED]
Vin: 1LNLMS8340SY001795

Dear Ms. Germain:

Thank you for the information submitted with your letter of January 19, 1998.

I have requested that a Design Analysis Engineer be assigned to this file for the purposes of inspecting the 1985 Lincoln Town Car. That individual will be contacting you so that arrangements can be made to conduct the inspection.

In the meantime can you please send us laser copies of the photos taken by your expert as well as the complete service history records on the vehicle to include any aftermarket additions or modifications that were made to the vehicle since purchase.

Once we are in receipt of the requested information and completion of the vehicle inspection we will evaluate your claim and you will be notified of our decision concerning your claim.

Sincerely,

Edward Drabonyk

E982-825-8 8829

BOURLAND, KIRKMAN, SEIDLER & EVANS, L.L.P.

ATTORNEYS AND COUNSELORS
801 HAAS STREET, SUITE 1400
FORT WORTH, TEXAS 76102
817) 336-6800 METRO 429-0747
FACSIMILE 817) 677-1963

RICHARD L. BOURLAND, P.C.
WILLIAM L. KIRKMAN
DAVID R. SEIDLER
DAVID L. EVANS
JAMES HYUNO H. ZADEH
LEWIS C. HALSTEDBERGEN

JAMES V. JAY IV
THOMAS H. MICHEL
CLAUDINE T. GERMAIN
JENNIFER H. LITKE

March 13, 1998

HORN, HALL, IN, LATIMORE, OF COUNSEL

Mr. Edward Drabczyk
Office of the General Counsel
Ford Motor Company
Parklane Towers West, Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

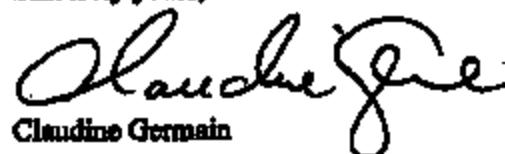
Re: [REDACTED]
VIN 1LNLMB34MSY601795

Dear Mr. Drabczyk:

In response to your letter dated February 5, 1998, I have obtained and enclosed laser copies of the photographs of [REDACTED] and [REDACTED] vehicle. I have spoke with [REDACTED] about any service history records which he may still have within his possession. He is unable to locate the records, but the only services performed on the vehicle involved routine oil changes and the one scheduled mileage checkup which he had reached during his ownership of the vehicle. All services, including oil changes, were performed at Lincoln Mercury dealerships. [REDACTED] also indicated that he may have the service records located with some income tax documents. If he is able to locate the records, I will certainly forward them to you as soon as possible.

In the meantime, if any additional information is needed, please do not hesitate to call. I appreciate your attention to this matter.

Sincerely yours,


Claudine Germain

CTG/ac

Enclosures

Mr. Edward Drabczyk

March 13, 1998

Page 2

cc: Michael A. Yonka, Esq. (w/encl.)
Bergman, Yonka, Stein & Bird, L.L.P.
4514 Travis Street
Travis Walk, Suite 300
Dallas, Texas 75205

FOR STAR BOND

BOURL, D., KIRKMAN, SEIDLER & EVANS, L.L.P.

ATTORNEYS AND COUNSELORS
801 MAIN STREET, SUITE F-400
FORT WORTH, TEXAS 76102
18177-330-8800 METRO 439-0747
FACSIMILE 18177-877-1863

RONALD L. BOURLAND, P.C.
WILLIAM L. KIRKMAN
DAVID R. SEIDLER
JAMES L. EVANS
JAMES T. GENE M. ZADEN
LEWIS G. WILFREDSOHN

JAMES V. DAY IV
THOMAS M. MICHEL
CATHERINE T. ODEHAN
JENNIFER H. LITKE

MICHAEL M. LATTPACHE, OF COUNSEL

November 6, 1997

North Hills Lincoln Mercury Sales, Inc.
401 Loop 820
Fort Worth, Texas 76053

CM:RRR # Z 263 627 943

Ford Motor Company
The American Road, Room 530
Dearborn, Michigan 48121

CM:RRR # Z 263 627 944

Re: My client : [REDACTED] and Prudential Property & Casualty
Insurance Company
Vehicle : 1995 Lincoln Towncar
Date of Loss : 01/20/97

Dear Sir or Madam:

Please be advised that this firm has been retained to represent [REDACTED] and Prudential Property and Casualty Insurance Company on behalf of a claim against North Hills Lincoln-Mercury Sales, Inc. and Ford Motor Company in the above referenced matter. The purpose of this letter is to formally advise you that it is our client's contention that North Hills Lincoln-Mercury Sales, Inc. ("North Hills Lincoln-Mercury") and Ford Motor Company ("Ford") have violated the Texas Deceptive Trade Practices and Consumer Act, TEX. BUS. & COM. CODE § 17.41 et. seq. (Vernon 1987 and Supp. 1996) ("DTPA") and TEX. BUS. & COM. CODE § 2.31 in the manner set forth below. This letter is also sent for the purpose of demand for payment under a breach of contract claim.

A summary of our legal position is as follows: In September of 1994, [REDACTED] and [REDACTED] purchased a 1995 Lincoln Towncar, vehicle identification number 1LNLM8WOSY601793 (the "Vehicle") from North Hills Lincoln-Mercury. The Vehicle was imported and sold by North Hills Lincoln-Mercury and Ford. At the time of purchase, the Vehicle was a new vehicle. On or around January 20, 1997, within approximately two years from the date of purchase, [REDACTED] vehicle caught fire in the garage in their home in Fort Worth, Texas. The fire was caused by a fuel leak at or near the forward connection of the right fuel rail to the front cross-over hose. As a result of the Vehicle's defects and subsequent fire, [REDACTED] experienced not only a total loss of their 1995 Lincoln, but also a total loss of their other family vehicle, a 1990 Lincoln Towncar, which

North Hills Lincoln Mercury Sales, Inc.

Ford Motor Company

November 6, 1997

Page 2

was in the garage at the time of the fire. In addition, [REDACTED] sustained damages to numerous personal items within the garage and incurred costs in restoring their home as a result of smoke damage.

North Hills Lincoln-Mercury and Ford have engaged in the following deceptive trade practices, which are declared unlawful by the DTPA:

- a. In causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services in violation of DTPA § 17.46(b)(2);
- b. In causing confusion or misunderstanding as to affiliation, connection, or association with, or certification by, another in violation of DTPA § 17.46(b)(3);
- c. In representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities which they do not have or that a person has a sponsorship, approval, status, affiliation, or connection which he/she does not in violation of DTPA § 17.46(b)(5);
- d. In representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another in violation of DTPA § 17.46(b)(7);
- e. In advertising goods or services with intent not to sell them as advertised in violation of DTPA § 17.46(b)(9);
- f. In knowingly making false or misleading statements of fact concerning the need for parts, replacement, or repair service in violation of DTPA § 17.46(b)(13); and
- g. In failing to disclose information concerning goods which was known at the time of the transaction if such failure to disclose such information was intended to induce the customer into a transaction into which the customer would not have entered had the information been disclosed in violation of DTPA § 17.46 (b)(23).

Furthermore, there was a gross disparity between the consideration paid by [REDACTED] and the value received. For this reason, the transaction was unconscionable as defined in DTPA § 17.45(5)(B) and is actionable under DTPA § 17.50(a)(3).

Based upon the information now available to us, and for purposes of this notice letter, we estimate that our client's damages are as follows:

North Hills Lincoln Mercury Sales, Inc.
Ford Motor Company
November 6, 1997
Page 3

Replacement value of the Vehicle	\$28,477.12
Replacement value of the 1990 Lincoln Towncar	\$13,173.08
Value of personal items destroyed	\$ 7,029.95
Costs of home repairs for damage from smoke/fire	\$37,785.87
Living expenses during time of repair	\$ 3,964.36
TOTAL AMOUNT OF ECONOMIC LOSSES:	\$90,430.38

We reserve the right to adjust this amount to conform to the information and evidence that will be available to us at the time of trial should litigation be necessary.

In addition, our client has incurred reasonable attorneys' fees in the pursuit of the claims stated in this letter. Of course, I am sure you understand that if this matter is not settled quickly, the amount of time spent on this claim and the amount of attorneys' fees will increase dramatically.

██████████ believe that such representations were made both knowingly and intentionally and seek recovery of treble damages as provided by the Deceptive Trade Practices Act. Under § 17.50(b)(1), a consumer who prevails may recover not only economic damages and mental anguish, but up to three times the amount of damages for mental anguish and economic damage for intentional acts of the defendant.

In the event you fail to respond to this letter with an offer of settlement that is acceptable to our client, we will have no alternative but to recommend to our client that a lawsuit also be filed against you. The lawsuit, among other authorities, will be filed under the Texas Deceptive Trade Practices and Consumer Protection Act.

In the event that you have insurance or a bond which you believe may cover all or any part of the claims made in this letter, you are requested to notify your insurance carrier or bonding company of this claim immediately.

If you are interest in resolving this matter without the necessity of litigation, please contact me within sixty (60) days of your receipt of this letter. Your cooperation is appreciated.

Sincerely yours,


Claudine Germain

CTG/ac
~~cc: [redacted]~~

CSCW140

VEHICLE DATA

98/03/26 14:44:47

OWNER VIN => 1LN1LMB3W0SY601795

NAME => FAILS

SIP => [REDACTED]

MODEL YR =>

OWNER NAME : [REDACTED]
STREET ADDR : [REDACTED]

CITY : FORT WORTH

ST/PRV: TX CTRY:

ZIP/POSTAL CODE: [REDACTED]

N/A DATE: 97-12-12

N/A SOURCE: N

MODEL YEAR : 95 PLANT: Y

BODY STYLE DESC: 4 DOOR SEDAN CARTIER

SALE DATE: 94-09-23

PRODUCTION DATE: 94-08-18

VEHICLE DESC : 1995 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	67	C	111	51	52
FACING	3	67	C	111		
RESPONSIBLE	3	67	C	111		

CA EMISSION :

ENGINE TAG CODE :

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 02

DSO DISTRICT :

FLEET CODE :

OPEN : 00 CLOSED : 02

DSO NUMBER :

FLEET STATUS :

ACTIVE: 02 HISTORY: 00

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

LPENJ82

E882-025-0 0000

CSCW150

CAMPAIGN VEHICLE INFORMATION

98/03/26 14:44:54

CAMPAIGN NUMBER--> 95812 VIN--> 1LNLM83W08Y601795 TYPE OF SEARCH: A
AL YEAR: 95 DEFECT: FT PIPE SEAL BODY STYLE: 4 DOOR SEDAN CARTIER
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 : 95-04-05
RESP DEALER INFORMATION: NEW: VENDOR N/A INFORMATION:
CURRENT: 3 67 111 ASSIGNED: 97-12-15 SOURCE: PX IND: MATCH CODE: 2
***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE DESCRIPTION	DATE	TYPE	DATE	P/A	CLAIM#	MICRO#	CL SRC
C COMPLETE	95-09-20	B	95-05-09	11414	105544	LIO1E5E	AC
M RELEASED FOR MAILING	95-07-10						
M RELEASED FOR MAILING	95-04-05						
R READY TO RELEASE	95-03-27						

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

LPENJ82

CSCN130

NOTIFICATION RECIPIENT HISTORY

98/03/26 14:44:57

==>

CAMPAIGN NBR => 95812 VIN => 1LMLMB3W05Y601795
EFFECT : FT PIPE SEAL BODY STYLE DESC: 4 DOOR SEDAN CARTIER
RESP DEALER : 378111 BEGINNING MAILED DATE: 95-07-18
RELEASE DESC : POSTCARD FOLLOWUP ENDING MAILED DATE : 95-07-18
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : [REDACTED] INITIALS: RL
STREET ADDR1 : [REDACTED]
ADDR2 : [REDACTED] ST/PRV: TX
CITY : FORT WORTH CTRY:
ZIP/POSTAL CODE: 761322029 N-A SOURCE: R N-A EFP DATE: 95-04-05

RESP DEALER : 378111 BEGINNING MAILED DATE: 95-04-28
RELEASE DESC : NEW ISSUE TOTAL ENDING MAILED DATE : 95-04-28
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : [REDACTED] INITIALS: RL
STREET ADDR1 : [REDACTED]
ADDR2 : [REDACTED] ST/PRV: TX
CITY : FORT WORTH CTRY:
ZIP/POSTAL CODE: 761322029 N-A SOURCE: R N-A EFP DATE: 95-04-05
F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140
X048=LAST PAGE LPENJ82

CSCN150

CAMPAIGN VEHICLE INFORMATION

98/03/26 14:45:04

CAMPAIGN NUMBER--> 96L12 VIN--> 1LMLM83W08Y601795 TYPE OF SEARCH: A
YEAR: 95 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN CARTIER

NEW STATUS CODE:

REPAIR INFORMATION:

TYPE CODE:

CAMP DIV : 6

REPAIR DATE: _____ DEALER P/A: _____

SUPP CODE :

MICRO REF: _____ CLAIM NUM: _____

KIT CODE : CR

DELETE REASON:

OASIS DATE :

RESP DEALER INFORMATION: NEW:

VENDOR N/A INFORMATION:

CURRENT: 3 67 111 ASSIGNED: 97-12-15 SOURCE: PX

IND: MATCH CODE: 2

EXTRACT DATE: 96-12-13

***** STATUS INFORMATION: ***** ***** REPAIR INFORMATION: *****

CODE DESCRIPTION

DATE

TYPE

DATE

P/A

CLAIM#

MICRO#

CL

SRC

OL

F FORCED COMPLETION 98-01-22 B 98-01-22 AUTOC

M RELEASED FOR MAILING 97-02-07

H AWAITING MAILING 96-11-24

DELETE REASON:

F1=INQUIRY F2=G140 F3=EXIT F5=G130 F7=FIRST F8=NEXT F9=MORE STATUS

F10=ADD STATUS F11=REVISE

I037=NO MORE DATA TO DISPLAY

LPENJ62

CSCN130

NOTIFICATION RECIPIENT HISTORY

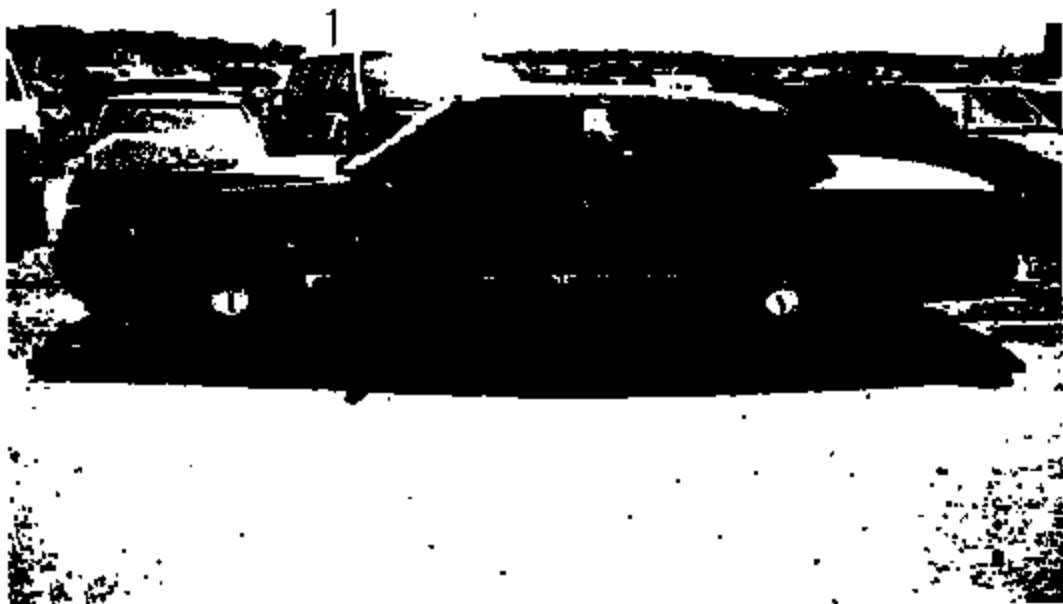
98/03/26 14:45:07

CARRIER CAMPAIGN NBR => 96L12 VIN => 1LNLM83W08Y601795
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DOOR SEDAN CARTIER
RESP DEALER : 367111 BEGINNING MAILED DATE: 97-02-21
RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-02-27
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS: RL
STREET ADDR1 :
ADDR2 : ST/PRV: TX
CITY : PORT WORTH CTRY:
ZIP/POSTAL CODE: 761322029 N-A SOURCE: R N-A EFF DATE: 95-04-05

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 :
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 LPENJ82



1. Front View of Vehicle Showing Extensive Fire/Heat Related Damage



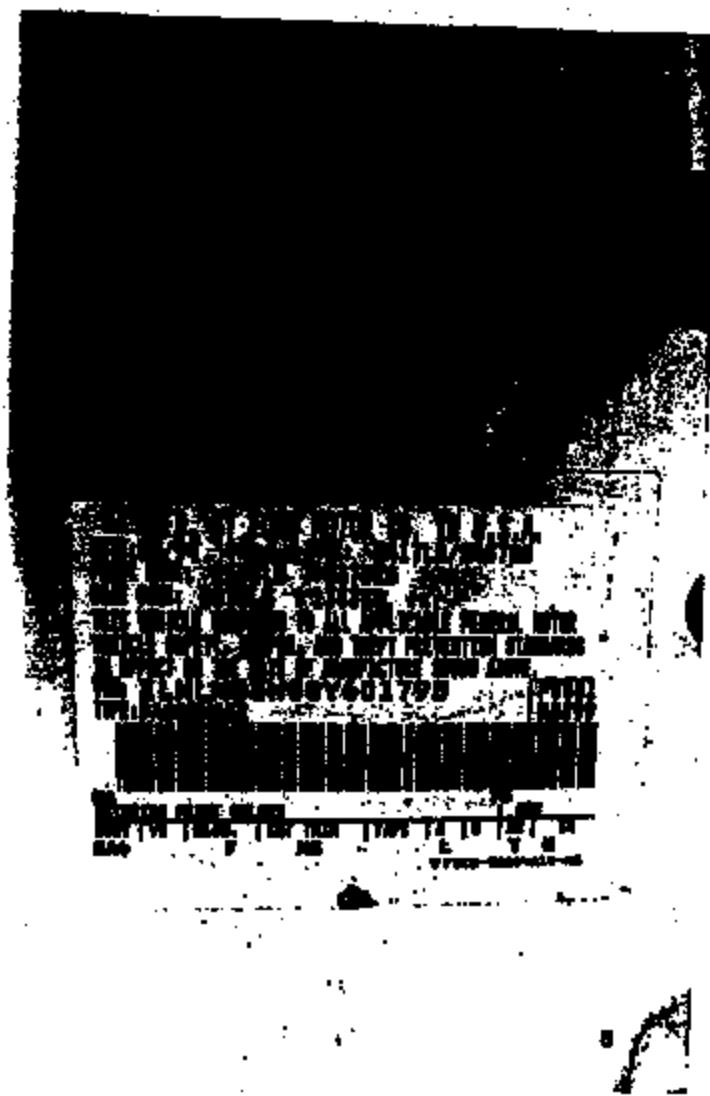
2. Left Side of Vehicle



3. Rear of Vehicle



4. Right Side of Vehicle



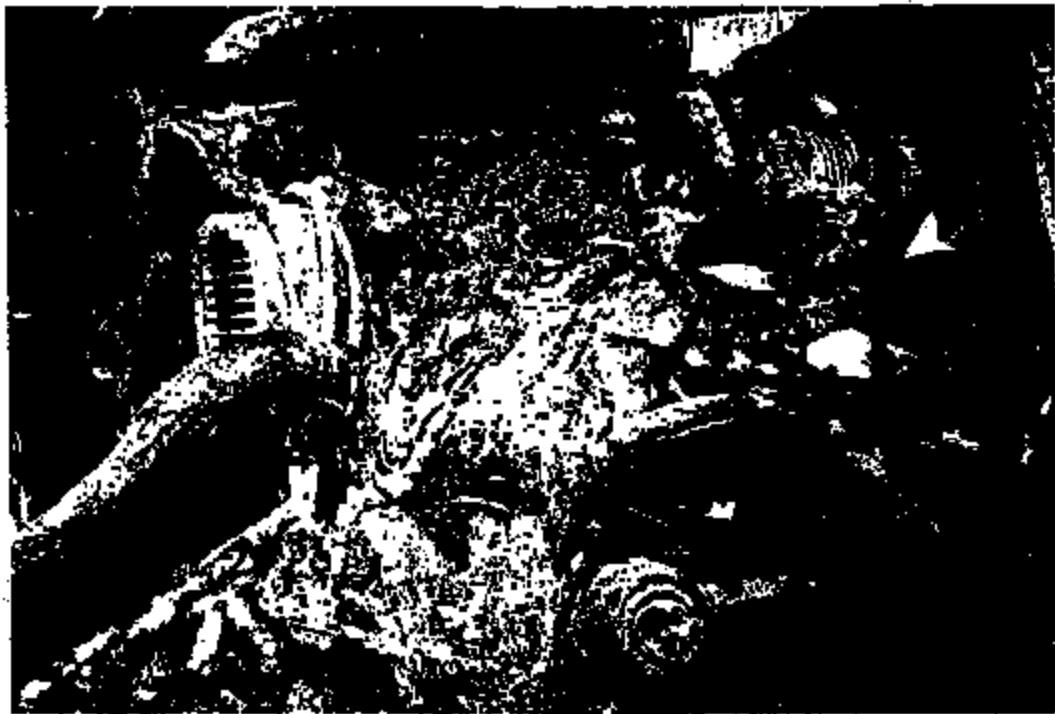
5. Vehicle Certification Label



6. Front Bumper,
Radiator, Front
Light Fixtures,
Engine Compart-
ment and Hood



7. Left Side of Engine Compartment



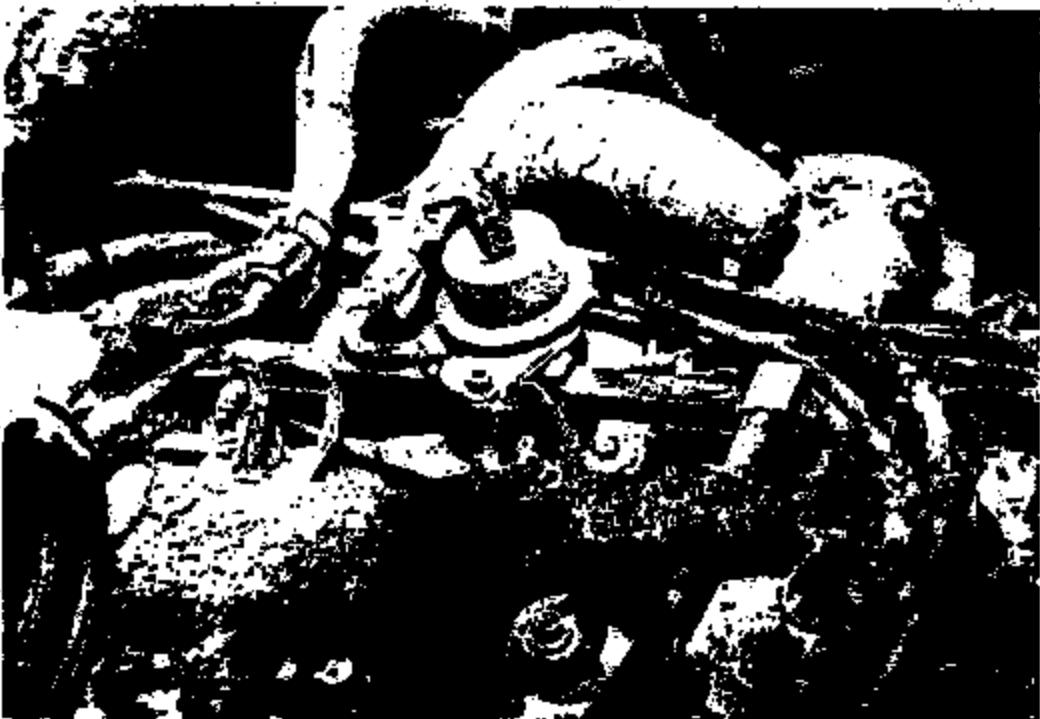
8. Close-up View of Melted Mass of Debris on Top of Engine,
and, Right Fuel Rail Front Hose Fitting (arrow)



9. Close-up View of Right Fuel Rail Front Hose Fitting



10. Damaged Right End of Front Cross-over Hose (arrow)



11. Front of Left Fuel Rail With
Left End of Front Cross-over
Hose Intact at Fitting



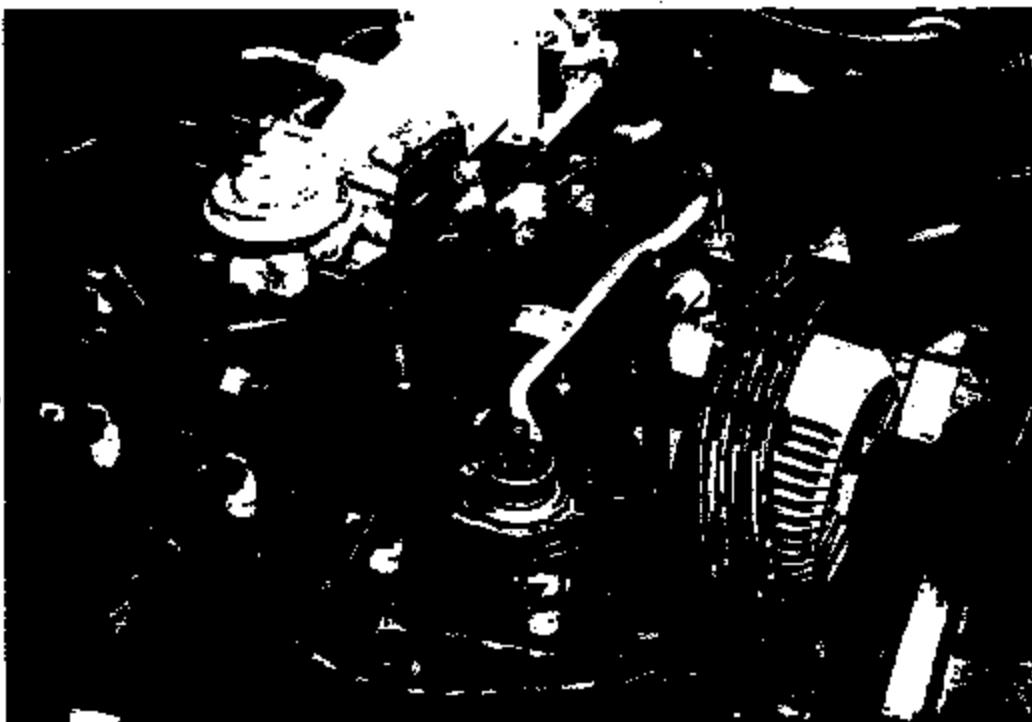
12. Rear of Left Fuel Rail With
Rear Cross-over Hose
Connected to Fitting, and
Crack in Hose (arrow)



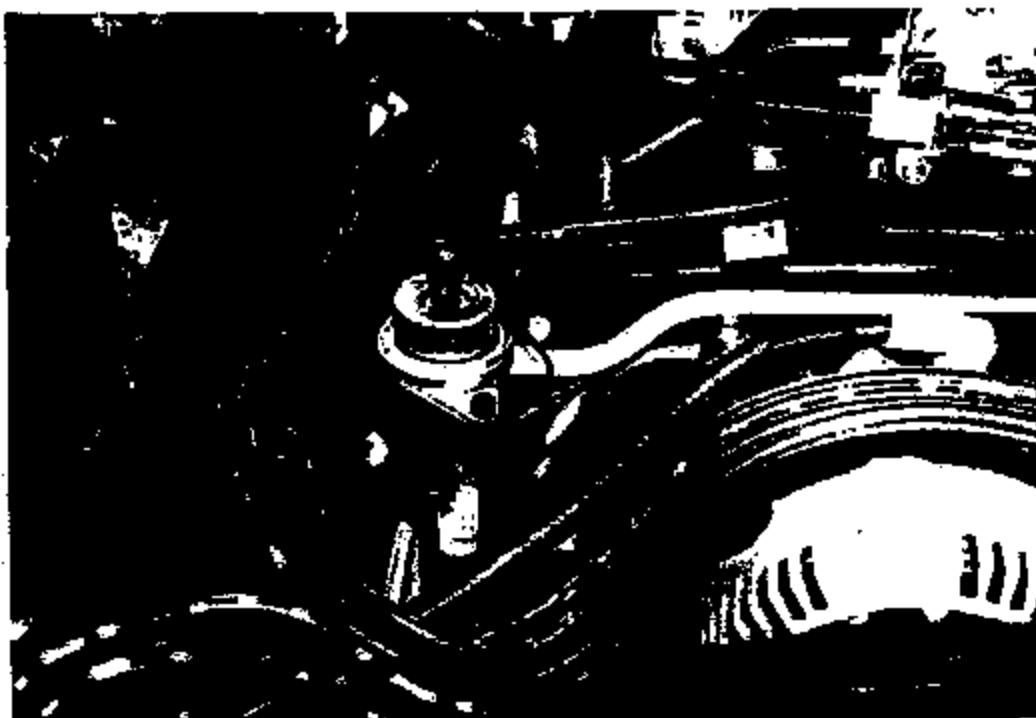
13. View of Right Fuel Rail Rear Cross-over Hose Connection



14. Severely Burned Right End of Front Cross-over Hose



17. Exemplar Vehicle Fuel Injection System



18. Close-up View of Fuel Pressure Regulator on Exemplar Vehicle



15. View of Right Rail of Fuel Injection Supply Manifold and Four Fuel Injectors Removed From Right Intake Manifold Placed Beside a New Fuel Injection Manifold and One New Fuel Injector



16. 1996 Lincoln Town Car Exemplar Vehicle

* GENERATED BY:
* FRANCIS KELLYR
*
* PHONE: 313-337-5881
*
* JOB: OGDB1911
*
* JOBDATE: 03/25/98
*
* TIME: 23:54:08
*

PRODUCTION VERSION 2.7

* VEHICLE HISTORY (BB-II) TYPE

* MODEL YEAR = 95
* CUT-OFF DATE = 13MAR98
* REPORT TITLE = FAILS
* VEHICLE TYPE = CARS

* REPORT CLAIM TYPE = ALL CLAIMS

* REPORT SORT SEQUENCE = PLANT CODE \ SERIAL NO

* PAGE ON PRIMARY SORTY= -
* PARETO MAX VALUE = -
* PLANT/SERIAL NUMBERS = Y601795

26MAR98
PAGE 2.01

1995 SE-II PARTS BY CONDITION CODE SUMMARY (19MAR98 C/O)
DATA ORDERED BY DECREASING PART NO. FREQUENCY
FAILS FRANCES KLEINSTR

PART NO	CD	COUNT
		1
MEED	82	1
15K601	42	1
18806	42	1
19CB36	49	1
7044D70	01	1

26MAR98
PAGE 3.01

1995 SE-II PARTS BY CUSTOMER CONCERN CODE SUMMARY (13MAR98 C/O)
DATA OWNED BY DESCENDING PART NO. FREQUENCY

PART NO	CCC	COUNT
PHFP	M99	1
15E601	L05	1
18806	A95	1
19CH36	C05	1
7044D70	B41	1

26MAR98
PAGE 4.01

1995 SE-II PART/CUSTOMER CODE DESCRIPTION SUMMARY (13MAR98 C/O)
DATA ORDERED BY DESCENDING REPAIR COUNT

NUMBER	PART DESCRIPTION	FAILS FRANCHES ELIGIBLE		COUNT	CUSTOMER CUSTOMER CODE DESCRIPTION (CCC)	COUNT
		COUNT	CD-DESCRIPTION			
PREP	1000 MILK PINT-OLIVE	1	43-DOME NOT OPERAT	2	MISSING CODE	1
15K601	TRANSMITTER REM/CONT	1	MISSING CODE	1	A05-RADIO/CD DOME NOT OPERATE PROPERLY	1
18806	CHASSIS RADIO	1	01-BROKEN/CRACKED	1	B41-APPEARANCE/FIT (BODY TRIM)	1
19C936	ACCOMULATOR/HOSE	1	49-CONTAMINATED	1	C05-AIR CONDITIONER-DOME NOT WORK PROPER	1
7044D70	PANEL-INST CLAS OP	1	82-BRIGHT/POSTAGE	1	L05-DOME NOT OPERATE PROPERLY (LATCHES)	1
		1+			M99-OWNER NOTIFICATION PROGRAM REPAIR	1

EM02-952-8 0005

 * CLAIMS LISTING FOR 1995 MODEL [REDACTED] *
 * SORTED BY: PLATCODE SERIALNO MILEAGE *

 REQUESTED BY: FRANCES KLEABIR 13MAR98 C/O:
 DATA SOURCE: PMSB SE-II

SUMMARY										RATIOS								
TOTALS				CLAIMS						CLAIMS		CLAIMS		MATERIAL		TOTAL		PCT CLAIMS
CLAIMS	W/COMENTS	IN TIS	VEHICLES	DEALERS	MATERIAL	TOTAL	* PER VEH	PER DEALR	TOTL/SAMP	COST/REP	COST/REP	TOTL/COST	COST/REP	TOTL/COST	W/COMENTS			
6	5	6	1	2	\$253.08	\$735.84	6.00	3.00	1.00	\$43.18	\$122.64	534						

-- CLAIMS LISTING TITLE ABBREVIATIONS --

SERIAL CAR B/S	ETS	PLT	PROD	WARR	SELL	CLAIM	MICRO C	WCC	PART	CC	CCC	CD	REPR	T	FACT	MILES	MAIL.	TOTL LSR	REPR	ST		
NUMBER LINE	CCN	NAM	DATE	DATE	DEALR	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	DATE	LG CODE	CODE	COAST	COST	HRS	DEALR			
[REDACTED]	BSC	3GT	BMW	WAY	03NOV94	04FEB95	11111	323456	JHM34001	7P04	17A553	46	C05	46	23MAR95	8*	806	10189	11.25	122	0.1	12345 MI

CARD SEQUENCE NO. -->
 CONCERN CODE (OLD CONDITION CODE) -->
 <-- SAMPLE INDICATOR (YES, NO) CUSTOMER CONCERN CODE -->
 CONDITION CODE -->
 TIME IN SERVICE --> <-- ACTUAL ODOMETER READING
 <-- TRANSACTION CODE-PRE PAYMENT EDIT

<-- ENGINE CODES -->		<-- TRANSMISSION CODES -->		<-- IF THIS ASTERISK APPEARS THEN CLAIM IS NOT USED IN TIS MATRIX.	
A = 2.0L-DOHC-PROBE	U = 3.0L	A = AX48 (AXOD)	C = ATX (4 SPD CD4E)	('CLAIMS IN TIS' TOTAL (IN SUMMARY ABOVE) EQUALS TOTAL CLAIM COUNT MINUS ASTERISK TIE CLAIMS)	
B = 2.5L-DOHC-PROBE	V = 4.0L-DOHC-FWD	B = ATX (4 SPD-4 RAT)	E = ATX (3 SPD ASPIRE)		
C = 5.0L-COBRA-R	W = 4.0L-DOHC	D = ATX (5 SPD)	F = AOD5 (ELECTRONIC)		
D = 5.0L-SEF COBRA	X = 4.0L-DOHC-FWD	G = MTX (5 SPD-MTX75)	G = MTX (5 SPD-MTX75)		
H = 1.3L-SOHC	Y = 3.0L-DOHC SHO	H = MTX (5 SPD-5 SPEED)	I = MTX (5 SPD)		
J = 1.9L-SOHC	Z = 2.0L-DOHC-EXPTRC	I = MTX (5 SPD-5 SPEED)	J = MTX (5 SPD)		
L = 2.5L-DOHC-DURATEC	1 = 3.0L-FLEX FUEL	K = AX48 (AXOD)	K = MTX (5 SPD)		
F = 3.0L-DOHC SHO	3 = 3.0L-FWD	L = 5 SPEED(T-5 MUSTANG)	L = MTX (5 SPD)		
R = 3.0L-SUPERCHARGED	4 = 3.0L-FWD	M = 5 SPEED(T-MUSTANG)	M = MTX (5 SPD)		
T = 5.0L-LOW PROFILE	5 = 1.8L-DOHC	N = 4L70W (WIDE-RATIO)	N = MTX (5 SPD)		
		O = 5 SPEED(T-BIRD S.C)	O = MTX (5 SPD)		
		P = 5 SPEED(T-BIRD S.C)	P = MTX (5 SPD)		
		Q = MTX 4 (5 SPEED)	Q = MTX (5 SPD)		
		R = MTX (3 SPD ASPIRE)	R = MTX (3 SPD)		

***** 1995 MODEL YEAR PASSENGER CAR BODY DESCRIPTIONS *****

VEHICLE	BODY DESCRIPTION	VEHICLE	BODY DESCRIPTION
MONTANA (MOS)	2-B 2 DOOR BASE 2BA 2 DOOR ALLOY BASE 1GT 2 DOOR GT 2GA 2 DOOR ALLOY GT 2GC 2 DOOR ALLOY CORSA	CVR CONVERT CVA CONVERT ALLOY BASE CGT CONVERT CGA CONVERT ALLOY INDY CGA CONVERT ALLOY GT	BASE ALLOY BASE GT INDY GT
PROBE	3-B 3 DOOR BASE (PRB)	3GT 3 DOOR GT	
RESCORT (ESC)	3-B 3 DOOR BASE 3GT 3 DOOR GT WXL STATION WAGON LX SLX 3 DOOR LX 4LX 4 DOOR LX SLX 5 DOOR LX	TRACER 4-B 4 DOOR BASE (TRA) 4LT 4 DOOR LWS W-3 4 DOOR BASE	BASE LWS BASE
COUVERTURE (CTR)	4-G 2 DOOR GL 4LX 4 DOOR LX 4SH 4 DOOR SH 4GL 2 DOOR ALLOY GL 4LL 4 DOOR ALLOY LX 4SL 4 DOOR ALLOY SH	MYSTIQUE 4GS 2 DOOR GS (MYS) 4LS 4 DOOR LS 4GL 2 DOOR ALLOY GS 4LL 4 DOOR ALLOY LS	GS LS ALLOY GS ALLOY LS
TAURUS (TAR)	4-P 4 DOOR POLICE 4PL 4 DOOR ALLOY POLICE 4SH 4 DOOR ALLOY SH 4-G 4 DOOR GL 4LX 4 DOOR LX 4GL 4 DOOR ALLOY GL 4LL 4 DOOR ALLOY LX W-G STATION WAGON GL WXL STATION WAGON LX WHL ST WAGON ALLOY BASE WHL ST WAGON ALLOY GL WLL ST WAGON ALLOY LX	SABLE (SAB) 4GS 4 DOOR GS 4LS 4 DOOR LS 4GL 4 DOOR ALLOY GS 4LL 4 DOOR ALLOY LS WGL ST WAGON ALLOY GS WGL ST WAGON ALLOY LS ALLOY - EQUIPPED WITH 4-WHEEL ANTI-LOCK DISC BRAKES.	POLICE ALLOY POLICE SH GL LX ALLOY GL ALLOY LX STATION WAGON GS STATION WAGON LS ST WAGON ALLOY BASE ST WAGON ALLOY GL ST WAGON ALLOY LX
T-BIRD (TBD)	2LL 2 DOOR ALLOY LX 2LK 2 DOOR LX 2GC 2 DOOR ALLOY SC	COUGAR 2XR 2 DOOR XR7 (CGR) 2XL 2 DOOR ALLOY XR7	
FORD	4-F 4 DOOR FLEET 4-B 4 DOOR BASE VICTORIA (FVD)	4PL 4 DOOR ALLOY POLICE MERCONY 4GS 4 DOOR GS GRAND 4LS 4 DOOR LS MARQUIS 4GL 4 DOOR ALLOY GS (MRC) 4LL 4 DOOR ALLOY LS 4-P 4 DOOR POLICE	FLEET BASE LX FLEET ALLOY BASE LX ALLOY LX POLICE
LINCOLN TOWN CAR (LNC)	4-L 4 DOOR EXECUTIVE 4-S 4 DOOR SIGNATURE 4DC 4 DOOR CARTIER	MARK VIII 28C 2 DOOR LSC CONTINENTAL 4-L 4 DOOR NAME	

***** 1995 LIGHT TRUCK BODY DESCRIPTIONS *****

VEHICLE	BODY DESCRIPTION	VEHICLE	BODY DESCRIPTION
F-AMERICA	15P 150 L.DUTY CONV. 4X2 (F82) 23P 250 L.DUTY CONV. 4X4 (F84) 2HP 250 H.DUTY CONV. 35M 350 H.DUTY NON-PICKUP 35P 350 H.DUTY CONV. 15S 150 L.DUTY SUPER 25C 250 H.DUTY CREW 2HS 250 H.DUTY SUPER	35B 350 H.DUTY SUPR 35C 350 H.DUTY CREW 452 450 H.DUTY CONV BRONCO S-L BASE 4X4 BLT ELT 4X4 BEE EDDIE BAUER 4X4	
VILLAGEWIR	VGB GS WAGON (VIL) VLS LS WAGON VAN BASE VAN	WINDSTAR WGL GL WAGON (WIN) WLX LX WAGON VAN BASE VAN	
RANGER	COM CONV CAB 4X2 (RA2) CSP CONV CAB SPLASH	SUP SUPER CAB 4X4 (RA4) SGP SUPER CAB SPLASH	
EXPLORER	2-B 2 DR BASE 4X2 (EX2) 2XL 2 DR XL 4X4 (EX4) 2XS 2 DR XLSPT 2SP 2 DR BAUER	4-B 4 DR BASE 4XL 4 DR XL 4LT 4 DR XLT 4KB 4 DR BAUER 4PR 4 DR PREM (LTD)	
AEROSTAR	REGULAR BODY 4X2 (AR2) RWH WINDOW WAGON XLT 4X4 (AR4) RCL CARGO VAN BASE	EXTENDED BODY SWH WINDOW WAGON XLT	
***** 1995 ECONOLINE/CLUB WAGON BODY DESCRIPTIONS *****			
(ECW)	<-- ECONOLINE --> 1HB 15G HINGED DOOR BASE 1HK 15G HINGED DOOR XL 2HR 250 HINGED DOOR BASE 2KX 250 HINGED DOOR XL 2SB 250 HINGED DR SUPR BASE 2XK 250 HINGED DR SUPR XL 3HB 350 HINGED DOOR BASE 3HK 350 HINGED DOOR XL 3KX 350 HINGED DR SUPR BASE 3XK 350 HINGED DR SUPR XL 3HB 150 SLIDING DOOR BASE 1HB 150 SLIDING DOOR BASE 1HK 150 SLIDING DOOR XL 2HB 250 SLIDING DOOR BASE 2XK 250 SLIDING DOOR XL 3HB 250 SLIDING DOOR XL 3CL 350 CUTAWAY BASE 3CM 350 CUTAWAY XL	<-- CLUB WAGON --> 1HB 150 HINGED DOOR CUST 1HK 150 HINGED DOOR ELT 1HP 150 HINGED DOOR CHAT 3HB 350 HINGED DOOR CUST 3HK 350 HINGED DOOR ELT 3HB 350 SLIDING DOOR CUST 1HB 150 SLIDING DOOR CHAT 1HK 150 SLIDING DOOR CHAT 3HB 350 SLIDING DOOR ELT 3HB 350 SLIDING DOOR CHAT 1HB 150 SLIDING DOOR CHAT 3HB 350 SLIDING DOOR CHAT 1HB 150 SLIDING DOOR CHAT 3HB 350 SLIDING DOOR CHAT 3HB 350 SLIDING DOOR CHAT 3HB 350 SLIDING DOOR CHAT	

13MAR98 CLAIMS LISTING FOR 1995 MODEL FAIR
PAGE 2 REPORTED BY POSTCODE SERIAL 100 MILLETS

13MAR98 C/O REQUESTED BY:
DATA SOURCE: PMS 2H-11 X53400

NOTE: IF THE VALUE HAS (*) THEN CLAIM NOT USED IN THIS MATRIX

VEHICLE INFORMATION		REPAIR INFORMATION																						
SERIAL CAR B/S	STN PLT	PERIOD	MAKE	SKILL	CLAIM	MICRO C	WCC PART	OC CCC CD	REFR	T	FACT MILES	MATL.	TOTL LBR REPR	ST										
NUMBER	LIN	OCT MM	DATE	INATE	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	IS	CODE	COST	COST	HRS DHLR										
601795	LNC	4DC	W4Y	WIK	18AUG94	23SEP94	11414	094521	RJF39201	SY05	P22HP	82	W99	82	23NOV94	3	1	1503	0.00	54	1.0	11414	TX	
** COMMENTS-CLAIM #1					CCOM-1000 MILES	SHUT OFF																		
601795	LNC	4DC	W4Y	WIK	18AUG94	23SEP94	11414	105544	LJ01R5E0							09MAY95	8	9581	5043	1.49	56	0.9	11414	TX
601795	LNC	4DC	W4Y	WIK	18AUG94	23SEP94	11414	105546	LJ01R5E0	7W04	15K601	L05	42	09MAY95	8	1	5043	0.00	38	0.7	11414	TX		
** COMMENTS-CLAIM #3					CCOM-KEYLESS ENTRY REMOTE INOP WILL NOT OPEN DOORS																			
601795	LNC	4DC	W4Y	WIK	18AUG94	23SEP94	11414	197469	DMLPSKD	7H11	19C836	C05	49	18OCT95	14	E83	9358	61.35	218	2.5	11467	TX		
** COMMENTS-CLAIM #4					CCOM-A-C NOT COOLING																			
601795	LNC	4DC	W4Y	WIK	18AUG94	23SEP94	11414	260131	JV2ME6KD	6L03	7044D70	B41	01	11OCT96	25	E84	15515	190.24	305	0.7	11467	TX		
** COMMENTS-CLAIM #5					CCOM-SOP INSTRUMENT PANEL STRESS CRACKED ABOVE STEERING COLUMN											PNM	Y	N						
601795	LNC	4DC	W4Y	WIK	18AUG94	23SEP94	11414	260131	JV2ME6KD	7W45	18806	A05	42	11OCT96	25	E83	15515	0.00	66	1.2	11467	TX		
** COMMENTS-CLAIM #6					CCOM-CUSTOMER STATES RADIO INOP											PNM	Y	N						
					TECH-PCU CIRCUITS OK. POSSIBLE LOOSE CONNECTION ON REAR CONTROL UNIT																			
					+ THIS LISTING CONTAINED 6 TOTAL CLAIMS																			

000-000-000

BATCH-ID S572000005 D TO AA

PRICE LEVEL 510010M83 VIN: 1LNLM83M0SY601795
REQUESTOR: KLEASIR CASE: FAILS

THIS INVOICE MAY NOT BE A COPY OF THE ORIGINAL IN VIEW OF THE POSSIBILITY OF PICTURE REDUCTION, ALTERNATING DISCOUNTS AND PRICE CHANGES FROM FORD MOTOR COMPANY TO THE DEALER.					
# THIS POSITION OF THE VEHICLE CREDIT VALUE APPLICABLE TO THE APPROPRIATE FORD FINANCIAL SUPPORT FINANCIAL DEALER ADJUSTMENT.					
ADJUSTMENT AMOUNT	INVOICE TOTAL	ADJUSTMENT AMOUNT	ADJUSTMENT AMOUNT	ADJUSTMENT AMOUNT	A PLAN

SOLD TO NORTH HILLS L-M SALES INC P.O. BOX 487 HURST TX 76055		67A111	FURTHER TERMS ON RECEIPT NAME PLT RLSE DTE 08/19/94 RK54
SHIP TO IF OTHER THAN ABOVE NORTH HILLS L-M SALES INC 3925 BOOTHIE CALLOWAY RICHLAND HILLS TX 76180		67111	SHIP THROUGH 09/15/94 67-7487 MS DC B622-825-8 8888
SALES & DATE IDENTIFICATION NO. 1LNLM83M0SY601795	FINAL ASSEMBLY POINT NTXOM	PURCHASE ORDER NUMBER THIS INVOICE TO BE USED FOR THE BILLING OF VEHICLE ONLY	FORD MOTOR CREDIT 000001 DEALER COPY

		DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1998	TOWN CAR CARTIER 4-DOOR		1	41200.00	41200.00
H6	IVORY PEARLESCENT OC				
H5	IVY/M SADDLE LTH ST SURFACE				
99H	4.6L 24V V8 ENGINE				
44U	ELECTRONIC AUTO O/D TRANS				
T2A	P22B/40B 145 ALL SEASON MSH				
155	PAINT TREATMENT - TRI-COAT				
	FRONT LICENSE PLATE BRACKET				
	TOTAL VEHICLE & OPTIONS		1	41200.00	41200.00
	DESTINATION & DELIVERY				
					625.00
					625.00

TOTAL FOR VEHICLE **41825.00**

13 U.S. GAL GAS FACTORY
DUPLICATE INVOICE ADJUSTMENT
BATCH-ID 3572000003 D TD AA
SCHEDULE-# LEVEL 00000
PRICE LEVEL \$10010M08
SHIPPING WEIGHT 3997 LBS. VIN: 1LNLM83W0SY601795

20 00
24 00-

THIS PRICE IS NOT A LIST PRICE OF THE VEHICLE IN VIEW OF THE POSSIBILITY OF FUTURE MARKETING ALLOWANCES, DISCOUNTS AND PROMOTIONAL OFFERS FROM FORD MOTOR COMPANY TO THE DEALER.					
* THIS PORTION OF THE VEHICLE PRICE WILL BE ADDED TO THE APPROPRIATE FOB ADDRESS TO SUPPORT FUTURE DEALER ADVERTISING.					
AMOUNT	INVOICE TOTAL	ADJUST	DISCOUNT	NET AMT	A PLAN
487.00	46,933.00	1,245.00		35,688.00	35,248.00
1245.00	9.00	.00	.00	1254.00	35467.00

SHIPTO # OTHER THAN ABOVE		FURTHER TERM& ON PAYMENT CODE	PLT RLSCE DTG
NORTH HILLS L-M SALES INC 67111 P.O. BOX 487 HURST TX 76053			08/19/94 RK34
NORTH HILLS L-M SALES INC 67111 3925 BOOTNE CALLOWAY RICHLAND HILLS TX 76180		SHIP THROUGH	ER62-025-3 0600

1LNLM83W0SY601795 NIXUM FORD MOTOR CREDIT 000001
TERMS PAYABLE IN 30 DAYS AFTER PURCHASE DATE OR 60 DAYS
IF PURCHASED ON CREDIT

STANDARD EQUIPMENT

- POWER DOORS
- POWER SEAT
- POWER REAR WINDOW DEFROSTER
- POWER SEDAN DOOR
- POWER LUMINATED DASH LAMPS
- POWER STEERING
- ACCESSORY POWER OUTLET
- AIR CONDITIONING
- ELECTRICAL
- POWER BRAKES
- POWER STEERING
- POWER DOORS

OPTIONAL EQUIPMENT

- POWER HEADLAMP
- POWER REAR WHEEL
- POWER FRONT DOOR
- POWER BACKUP LIGHTS
- POWER FRONT AND REAR CASSETTE
- POWER OUTLETS
- POWER COMFORT LOUNGE
- ELECTRONIC DIGITAL CLOCK
- POWER COOLING
- POWER REAR WINDSHIELD WIPER

PRICE INFORMATION

STANDARD VEHICLE PRICE \$41,295.00
OPTIONAL EQUIPMENT
PAINT TREATMENT - TRI-COAT NO CHARGE
TOTAL VEHICLE PRICE \$41,295.00
DESTINATION & DELIVERY \$200.00

This vehicle is equipped with
an engine that has a
100,000 mile tune-up interval.

1000-220-0000

SOLD TO
JOHN DEERE LAW OFFICES INC
12170000

DELIVERED TO
JOHN DEERE LAW OFFICES INC
12170000

1000-220-0000

1000-220-0000

1000-220-0000

1000-220-0000

1000-220-0000

CSOR0004

MORE II Contact History Summary by VIN

03/25/1998 11:48:44

VIN: 1LNLM83W0SY601795 Year: 95 Model: TOWN CAR

To TRANSFER contact information: Type a "T" in the "A" column and Press ENTER
To VIEW contact information: Type a "X" in the "A" column and Press ENTER

Contact A Number	Form/ File Type	Open Date	Last Close Date	Hdlg Date	Status	O.R. Customer
- 109259647	LEGAL	12/12/1997	01/14/1998	02/09/1998	CLOSED	FAILS
- 108138281	IMQ	02/25/1997	02/25/1997	02/25/1997	CLOSED	GRAY ENGINEERIN

F1=HELP F3=EXIT F7=FIRST F8=NEXT
I020 FIRST VIN SUMMARY SCREEN DISPLAYED

OGDB191

CSOR0016

MORES III Legal Contact

03/25/1998 11:48:58

DALLAS 52 Zn/Tr: C2 M/A: CONTACT NBR: 109259647 Opened: 12/12/1997
VIN: 1LNLM83W0SY601795 **VLC** Closed: 01/14/1998
Last Name: [REDACTED] First Name: [REDACTED] Status: CLOSED
Title: [REDACTED] MI:
Address: [REDACTED]
City: FORT WORTH ST/PV: TX Zip/PC: [REDACTED] CC: USA
Home Phone: NOT PROVIDED Business Phone: NOT PROVIDED Ext:
Year: 95 Model: TOWN CAR
Mileage/Km: 15515 WSD: 09/23/1994

Dealer Name: NORTH HILLS L-M SALES Sales Code: 367111 P&A: 11414
Causal Code: 0721 Symptoms: 404100 Trans Date:
Serv Sales: 1 (1 or 2) Origin: GO
Veh Repl:
Case Type: 4 FIRES - FUEL PFD Means Code: A LGL INVEST-PROD LIABILITY
Atty Name: CALUDINE GERMAINE Atty Memo: 817/336-2800
Claimed Amt:
CANADA ONLY:
Court Code: Award Code:

F1=HELP F3=EXIT F4=COMMENT F5=ADD F6=UPD F9=CLOSE F12=CANC
I053 REQUESTED COMPLCT DISPLAYED

CGDB191

CSOR0010

MORS II Contact Comments

03/25/1998 11:49:04

Last Name: [REDACTED] VIN: 1LNLM83W0SY601795
Home Phone: NOT PROVIDED Bus. Phone: NOT PROVIDED Ext:
Dealer: NORTH HILLS L-M SALES Dist/Reg: 52

CONTACT NBR: [REDACTED] Date: 12/12/1997 Analyst Code: 3700DG
File Type: LEGAL Time: 15:33:21 Analyst Name: GARRISON
Comm Type: M MAIL Micro: Letter Code:
VLC VERY LOYAL CUSTOMER - IMMEDIATE ATTENTION REQUESTED ***

Comments: More?: Y
ATTORNEY DEMAND LETTER RECEIVED 12/8/97

NAVIS:ORIGINAL
*

ATTORNEY LETTER STATES THAT HIS CLIENT'S VEHICLE CAUGHT FIRE WHILE SITTING IN THE GARAGE. HIS CLIENT IS REQUESTING TO BE REIMBURSED FOR THE LOSS OF THE VEHICLE, DAMAGES TO HIS GARAGE, AND PERSONAL ITEMS LOST IN FIRE.

*

LEGAL ANALYST (LPA) ACK ATTY LETTER.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
E196 FIRST COMMENTS FOR CONTACT OGDS191

652-2888
1-1-8
1-1-8
1-1-8

CSOR0010

MORS II Contact Comments

03/25/1998 11:49:08

Last Name: [REDACTED] VIN: 1LNLM83W0SY601795
Home Phone: NOT PROVIDED Bus. Phone: NOT PROVIDED Ext:
Dealer: NORTH HILLS L-M SALES Dist/Reg: 52

CONTACT NBR: [REDACTED] Date: 01/14/1998 Analyst Code: 7652MM
File Type: LEGAL Time: 09:18:22 Analyst Name: MINNIS
Comm Type: O OUT CALL Micro: Letter Code:
VLC VERY LOYAL CUSTOMER - IMMEDIATE ATTENTION REQUESTED ***
Comments: More?: Y

*
-LPA MADE OUTBOUND CALL AND LEFT MESSAGE ON THE VOICE MAIL OF ATTORNEY
REQUESTING RECONTACT.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
1002 REQUESTED INFORMATION DISPLAYED OGDB191

5000 5-022-2285

CSOR0010

MORS II Contact Comments

03/25/1998 11:49:12

Last Name: [REDACTED] VIN: 1LNLM83W0SY601795
Home Phone: NOT PROVIDED Bus. Phone: NOT PROVIDED Ext:
Dealer: NORTH HILLS L-M SALES Dist/Reg: 52

CONTACT NBR: [REDACTED] Date: 01/14/1998 Analyst Code: 7652MM
File Type: LEGAL Time: 10:14:16 Analyst Name: MINNIS
Comm Type: O OUT CALL Micro: Letter Code:
VLC VERY LOYAL CUSTOMER - IMMEDIATE ATTENTION REQUESTED ***

Comments: More?: Y

##THIS IS THE CLOSING COMMENT

*

-ATTORNEY ADVISED THAT THE INSURANCE COMPANY HAS ALREADY PAID OFF THE CLAIM
FOR DAMAGES. THEREFORE, LPA PROVIDED ADDRESS FOR SUBROGATION.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
Z002 REQUESTED INFORMATION DISPLAYED OGDB191

CSOR0010

MORES II Contact Comments

03/25/1998 11:49:16

Last Name: [REDACTED] VIN: 1LNLM83W0SY601795
Home Phone: NOT PROVIDED Bus. Phone: NOT PROVIDED Ext:
Dealer: NORTH HILLS L-M SALES Dist/Reg: 52

CONTACT NBR: [REDACTED] Date: 02/09/1998 Analyst Code: 7020RH
File Type: LEGAL Time: 14:15:44 Analyst Name: HARRIS
Comm Type: M MAIL Micro: 5202168 Letter Code:
VLC VERY LOYAL CUSTOMER - IMMEDIATE ATTENTION REQUESTED ***
Comments: More?: N
ADDED MICRO

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
1002 REQUESTED INFORMATION DISPLAYED OGDB191

CSOR0062

MORS II Inquiry Contact

03/25/1998 11:49:24

DALLAS 52 Zn/Tr: C2 M/A: CONTACT NBR: 108138281 Opened: 02/25/1997
VIN: 1LNLM83W0SY601795 Analyst: 1599KC Closed: 02/25/1997
Last Name: [REDACTED] Status: CLOSED
Title: [REDACTED] First Name: [REDACTED]
Address: [REDACTED] MI: [REDACTED]
City: GRAND PRAIRE ST/PV: TX Zip/PC: [REDACTED] CC: USA
Home Phone: Business Phone: Ext:
Year: 95 Model: TOWN CAR
Mileage/Km: WSD: 09/23/1994

Dealer Name: NORTH HILLS L-M SALES SALES CODE: 367111 P&A: 11414
Causal Code: Symptoms:
Inquiry Code: 100 RECALL/CNP

Follow Up?: N Comm Type: P Micro Nbr: More Comments?: N
Letter Code:

* CUSTOMER SEEKS:

- RECALL INFORMATION

F1=HELP F3=EXIT F4=CMTS F5=ADD F6=UPD F9=CLS F10=CRN UP F11=REGN UP F12=INFO UP
I053 REQUESTED CONTACT DISPLAYED OGDB191

CSOR0010

MORS II Contact Comments

03/25/1998 11:49:33

Last Name: [REDACTED]
Home Phone: Bus. Phone:
Dealer: NORTH HILLS L-M SALES

VIN: 1LMLM83W0SY601795
Ext:
Dist/Reg: 52

CONTACT NBR: 108138281 Date: 02/25/1997
File Type: INQ Time: 12:23:42
Comm Type: P PHONE Micro:

Analyst Code: 1599KC
Analyst Name: CASHMORE
Letter Code:

Comments:

More?: N

*

CUSTOMER SEEKS:

- RECALL INFORMATION
*

CAC ADVISED:

- THERE ARE NO CURRENT RECALLS ON THE VEHICLE

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
OGDB191

5552-322-5 5556

CSOR0021

MORS II Recall Inquiry

03/25/1998 11:49:42

VIN: 1LNLM83W0SY601795
Year: 95 Model: TOWN CAR

Build Date: 08/18/1994
WSD: 09/23/1994

Campaign Number	Campaign Type	Description	Campaign Status	Status Date	Dealer Code
95S12	S	FT PIPE SEAL	COMPLETE	05/09/1995	11414
96L12	L	PASS AIR BAG	FORCED COMPLETION	01/22/1998	AUTOC

F3-EXIT
1002 REQUESTED INFORMATION DISPLAYED

OGDB191

CS0R0023

MORS II ESP Inquiry

03/25/1998 11:49:59

VIN: 1LNLM83W0SY601795 Year: 95 Model: TOWN CAR

Contract Selling Dealer P&A Code: 11414 Name: NORTH HILLS L-M SALES INC

Contract Owner

Street

City

zip/PC

ESP INFORMATION: Plan Option Expiration Signature								
YR	Code	Date	Mi/Km	Date	Rent	Days	Tow	Ded
94		09/23/2000	75000	09/27/1994	30	5	45	50

COVERAGE DESCRIPTION: EN1994 NEW 72/075,000 PREMIUMCARE

Cancel Date	Processing Date	Dealership Credited Name	P&A	W&P Statement	Percentage of Refund
-----	-----	-----	-----	-----	-----

F3=EXIT F7=FIRST F8=NEXT

F112 LAST RECORD DISPLAYED - FORWARD SCROLL NOT ALLOWED

OGDB191

MVHP510

=>

MAVIS Vehicle Inquiry

03/25/98 11:47:09

VEHICLE ID: 1LSY601795 (WWVPMXXXX) vln: 1LNLM83W0SY601795 Div: 3 Status: 800
Vehicle Line: CVB Convoy Deliv: 090194 Orig P-Lvl: 500 Selling Dlr: 67A111
Order Recpt: 062394 ShipTo Stat: Carr P-Lvl: 510 Sale Date: 092394
Orig Sched: 080194 Rls-To Stat: TX Order Dlr: 67111 Demo Date:
Inv Prep: 090794 Orig Int St: 090994 Orig Rls Dlr: 67111 Deliv Type: 0
Prod Date: 081894 Curr Int St: 090994 Rls Dlr PAA: 11414 Sales Prd: 094093
Rls Date: 081994 Dlrfin Ext: 101094 Warr Start: 092394 Cancel Sl:
Memo Consign: PAC Ext: 101094 WarrS-Ind: Sale Status: G
Orig Pltbus: 081994 Advert Ext: 101094 -Date- -Dealer-
Curr Pltbus: 090894 Shspn Sht: 3537 Shipped: 082494
T/HName: 4 RAYMOND L FAILS Curr Stock: 092294 67A111
Addr: 4800 WENTWORTH CT 1st-Prior: 091594 67336
City: FT WORTH State: TX 2nd-Prior: 081994 67111
Zip: 76132 M/A-Recpt: 092694 3rd-Prior: 081994 67111
V.O.: 1 2 3 4 5 6 7 8
1234523456789012345678901234567890123456789012345678901234
M83SY A 3 2 01H7487 NF E U17 2A 3 LL A T 67A111 2 HA
8 9 0 1 2 3 4 5 6
567890123456789012345678901234567890123456789012345678901234567890
M5 WILNL0 5 F 760A 7NU
F1=Help F3=Exit F4=Primary Menu F5=Financial Screen F9=Screen #3

OGDB191

582-828-8872

MVNP530

MAVIS Inquiry Screen #3

03/25/98 11:47:27

=>

VEHICLE ID: 1LSY601795 (MVNP530) VIN: 1LNLM83W0SY601795 Div: 3 Status: 800

Ordering Name:

Distr Status: P

Secondary Name:

Last MAVIS St: 092694

Ordering FIRM:

Distr Stat Dt: 090194

Order-For FIRM:

Last Activity: 013098

Orig Ord'r Type: 2

Serialized Dte: 062494

Scheduled Dte: 080194

Mexico Status:

Component Data - - - - -

Dr Post/Calib: MTJ

Tire Brand: A

Brake Cntl Lbl: L2M

EMC:

Engine Tag Cd: 5G812AA

Engine Serial:

Driver Airbag: FCAR833UCQP

Pasngr Airbag: T420720468

Axle: JY

F1=Help F3=Exit F4=Primary Menu F5=Financial Screen F6=Screen #1

OGDB191

522-225-6 0573

WVMP520

MAVTS Financial Screen

03/25/98 11:47:34

=>

VEHICLE ID: 1LSY601795 (WWYPRBMMB) VIN: 1LNLM83W0SY601795 Div: 3 Status: 800

Financial Data - - - - -

Orig Totl Inv:	37182.80	A-Plan Price:	35243.80	Predel Invoice:	.00
Curr Totl Inv:	37182.80	Total Adj:	-249.00	Sched-A GST:	.00
Base Vehicle:	35432.00	Base Adj:	.00	FOC GST:	.00
Options:	258.00	Option Adj:	-249.00	Price Protect:	.00
Base Holdback:	1236.00	Base Hb Adj:	.00	Chargeback Amt:	
Optyn Holdback:	9.00	Option Hb Adj:	9.00	30-Day FP Amt:	406.68
Misc Charges:	.00	Gas Amt:	20.80	Floor Plan:	.00
Finance Charge:	360.00	Sched-B Amt:	625.00	P&C Charge:	134.68
WDAF/LMDA:	487.00	Mktng Contrib:	390.00	Pre-Dlvry Amt:	.00

Financing Data - - - - -

Finance Source:	0000001	O-Warr Start:	092394	Release Date:	081994
Orig Int St-Sw:	N	Co Tag Number:		Transit Time:	17
Ret Draft Ind:		Pre-del Date:		Rls Plns Trans:	090594
Floor Pln Date:	101094	Prdlyv S.Code:		Ramp Code:	10
Advt Comm Code:	A	Lease Code:		Method Shipped:	7
Upfront FP Ind:		Invoice In-Proc:	012998	Memo Comm Loc:	

F1=Help F3=Exit F4=Primary Menu F6=Screen #1 F9=Screen #3

OGDB191

NO. 342-176924-99

[REDACTED]
VS.

FORD MOTOR COMPANY;
NORTH HILLS LINCOLN MERCURY
SALES, INC.

IN THE DISTRICT COURT OF
TARRANT COUNTY, TEXAS

JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME [REDACTED], Plaintiff ("Plaintiff") complaining of Defendants Ford Motor Company and North Hills Lincoln Mercury Sales, Inc. ("Defendants") and for cause of action would show the Court and jury as follows:

1.

PARTIES AND DISCOVERY CONTROL PLAN

- 1.01 This case is to be governed by the Level Two Discovery Control Plan.
- 1.02 Plaintiff is a resident of Tarrant County, Texas.
- 1.03 Defendant, Ford Motor Company is a foreign corporation doing business in Tarrant County, Texas and may be served through its registered agent, C.T. Corporation Systems, 350 N. St. Paul Street, Ste. 2800, Dallas, Texas 75201.
- 1.04 Defendant, North Hills Lincoln Mercury Sales, Inc. is a foreign corporation doing business in Tarrant County, Texas and may be served through its registered agent at C.T. Corporation Systems, 350 N. St. Paul Street, Ste. 2800, Dallas, Texas 75201.
- 1.05 Whenever in this petition it is alleged that Defendants did or made any act, representations, or omissions, it is meant that these named Defendants, their predecessors in interest, their previous

PLAINTIFF'S ORIGINAL PETITION

Page 1

or current holding companies, their current parent companies, or any of Defendants' officers, agents, servants, employees, or representatives did such an act, representation, or omission, and that at the time such act, representation, or omission was done, it was done with the full authorization or ratification of Defendants, or was done in the normal and routine course and scope of employment of Defendants' officers, agents, servants, employees, or representatives.

II.
VENUE

2.01 Venue is proper in Tarrant County as all or a substantial part of the events or omissions giving rise to the claim occurred in Tarrant County.

III.
JURISDICTION

3.01 The damages sought by Plaintiff, exclusive of interest and costs, exceed the minimum jurisdictional limits of Court.

IV.
STATEMENT OF FACTS

4.01 Defendants, are engaged in the business of designing, manufacturing, selling and marketing automobiles. Plaintiff owned a 1995 Lincoln Town Car manufactured by Ford, vehicle identification number 1LNL M83W08Y601795, Texas Licen [REDACTED] (the "Vehicle"). The vehicle was imported and sold by North Hills Lincoln Mercury Sales, Inc. On January 20, 1997, Plaintiff parked his car in the garage at his home located at [REDACTED], Fort Worth, Texas [REDACTED]. After entering his home, the Plaintiff saw smoke coming from under the door to the garage. Plaintiff opened the door and saw that the engine compartment of the vehicle was on fire with flames coming out of the grill towards the ceiling. Plaintiff called 911 to report the fire.

4.02 The Fire Department responded quickly to the alarm which was reported at 5:16 p.m. on January 20, 1997. The Fire Department report indicates that the fire started in the engine area of the vehicle. The Fire Department also reported that the evidence indicates that there was some type of fuel leak or malfunction on the top of the engine. The Fire Department indicated that the fire extended out of the engine area and throughout the garage and that the heat and smoke went up throughout the residence. As a result of the smoke and fire, the Plaintiff suffered damages including the loss of the other family vehicle, a 1990 Lincoln Town Car, and damage to their home in an amount in excess of the minimum jurisdictional limits of the Court.

V.
CAUSES OF ACTION
DTPA

5.01 This suit is filed in part pursuant to the Texas Deceptive Trade Practices and Consumer Act, TEX. BUS. & COM. CODE § 17.41 et. seq. (Vernon 1987 and Supp. 1996) ("DTPA") and TEX. BUS. & COM. CODE § 2.31 in the manner set forth below.

5.02 Defendants have engaged in the following deceptive trade practices, which are declared unlawful by the DTPA:

- a. In causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services in violation of DTPA § 17.46(b)(2);
- b. In causing confusion or misunderstanding as to affiliation, connection, or association with, or certification by, another in violation of DTPA § 17.46(b)(3);
- c. In representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities which they do not have or that a person has a sponsorship, approval, status, affiliation, or connection which he/she does not

- In violation of DTPA § 17.46(b)(5);
- d. In representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another in violation of DTPA § 17.46(b)(7);
- e. In advertising goods or services with intent not to sell them as advertised in violation of DTPA § 17.46(b)(9);
- f. In knowingly making false or misleading statements of fact concerning the need for parts, replacement, or repair service in violation of DTPA § 17.46(b)(13); and
- g. In failing to disclose information concerning goods which was known at the time of the transaction if such failure to disclose such information was intended to induce the customer into a transaction into which the customer would not have entered had the information been disclosed in violation of DTPA § 17.46 (b)(23).

5.03 Furthermore, there was a gross disparity between the consideration paid by Plaintiff and the value received. For this reason, the transaction was unconscionable as defined in DTPA § 17.45(5)(B) and is actionable under DTPA § 17.50(a)(3).

5.04 Plaintiff believes that such representations were made both knowingly and intentionally and seek recovery of treble damages as provided by the Deceptive Trade Practices Act. Under § 17.50(b)(1), a consumer who prevails may recover not only economic damages and mental anguish, but up to three times the amount of damages for mental anguish and economic damage for intentional acts of the defendant.

5.05 Written notice of the claims made herein have been given to Defendants.

VI.
NEGLIGENCE

6.01 The damages suffered by Plaintiff are direct and proximate result of the negligence of Defendants in that Defendants produced, sold and/or otherwise put into the stream of commerce a vehicle in which the Defendants knew, or if they had exercised ordinary care, should have known was defective. Defendants were negligent in one, some and/or all of the following respects, among others, same being proximate cause of Plaintiff's damages: (a) failing to timely and adequately warn Plaintiff of the dangerous characteristics associated with the vehicle; (b) in failing to place timely and adequate warnings on the vehicle to warn of the potential dangers with the vehicle; (c) in failing to develop and utilize a substitute product or products which would have prevented the fire in the vehicle; (d) in failing to properly design and manufacture the vehicle for safe use under conditions of use that were reasonably anticipated; (e) in failing to properly test said vehicle or machinery before it was released for consumer use; and (f) in failing to recall and/or remove from the stream of commerce said vehicle despite knowledge of the unsafe and dangerous nature of such vehicle. The damages of Plaintiff are a direct and proximate result of Defendants' negligence.

VII.
DESIGN DEFECT/MARKETING DEFECT

7.01 All the allegations contained in the previous paragraphs are alleged herein.

7.02 Plaintiff would show that the defective condition of the vehicle rendered the vehicle unreasonably dangerous and that the vehicle was in its defective condition at the time it left the hands of Defendants. Defendants were engaged in the business of selling the vehicle without substantial change in the condition it was sold which was the proximate cause of the injuries of Plaintiff.

7.03 Defendants knew that the vehicle would be used without inspection for defects and, placing it in the market, represented that it was safe to do the job for which it was intended. Plaintiff was unaware of the hazards and defects in the vehicle which made it unsafe for purposes of which it was intended. During the period that Plaintiff utilized the vehicle, the vehicle was being utilized in a manner in which it was intended by Defendants.

VIII.
BREACH OF EXPRESS AND IMPLIED WARRANTIES UNDER THE UCC.

8.01 For further cause of action, Plaintiff's allege that at all times material to this action, Defendants held itself out to the public as having knowledge or skills peculiar to the business of manufacturing, designing, marketing and selling automobiles. Accordingly, Defendants impliedly warranted that their manufacturing, designing, marketing and selling of automobiles would be performed pursuant to the provisions of Sections 2.313, 2.314 and 2.315 of the Texas Business and Commerce Code. At the time Defendants made such warranties and all times thereafter, the goods were not as warranted, but rather defective as set forth above.

8.02 As a proximate result of Defendants' breach of warranty, Plaintiff sustained actual, incidental, and consequential damages in excess of the minimum jurisdictional limits of the Court.

IX.
BREACH OF CONTRACT

9.01 The conduct of Defendants constitutes a breach of the contract. As a result of this breach, Plaintiff has suffered damages, all of which were reasonably foreseeable. Accordingly, Plaintiff engaged the undersigned attorney to seek collection of the amounts due and owing. The undersigned attorney sent Defendants a letter requesting the sums due and owing to Plaintiff.

9.02 Defendants have refused to pay Plaintiff. Accordingly, Plaintiff is entitled to a reasonable

and necessary attorney's fee for having to engage an attorney to seek collection of this matter.

X.
ATTORNEYS' FEES

10.01 The undersigned attorneys have been retained by Plaintiff to pursue the cause of action alleged herein. Pursuant to DTPA § 17.50, and Tex. Civ. Prac. & Rem. Code § 16.001, *et seq.*, all attorneys' fees that are reasonable and necessary in this cause may be recovered by Plaintiff. These attorneys' fees are in an amount in excess of the minimum jurisdictional limits of the Court.

XL
SUBROGATION

11.01 Suit is brought in part by Prudential Property and Casualty Insurance Company, Subrogee to all recovery who prays for a judgment in its name.

XII.
PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully pray that Defendants be cited according to the law to appear and answer herein, and that after trial of this cause, Plaintiff and Prudential Property and Casualty Insurance Company have judgment against Defendants in an amount in excess of the minimum jurisdictional limits of the Court, together with pre-judgment and post-judgment interest on such amount at the legal rate.

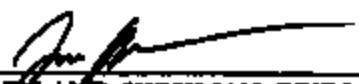
Plaintiff prays for additional damages pursuant to Section 17.50 of the DTPA in an amount not to exceed three times that amount of actual damages which exceed \$1,000.00.

Plaintiff prays for attorneys' fees that are reasonable and necessary in this case, as set forth above, and for costs of court.

Plaintiff also served on Defendants, pursuant to Texas Rules of Civil Procedure, Plaintiff's Request for Disclosure.

Respectfully submitted,

Jenshyd (Jim) M. Zadeh
State Bar No. 22239000


~~BOLTLAND, KIRKMAN, SEIDLER~~
& EVANS, L.L.P.

201 Main Street, Suite 1400
Fort Worth, Texas 76102
Telephone: (817) 336-2800
Facsimile: (817) 877-1863

ATTORNEYS FOR PLAINTIFF

JURY DEMAND

Plaintiff demands that all issues of fact in this case be tried to a properly empaneled jury.