

EA02-025

FORD 10/27/03

LETTER TO ODI

APPENDIX M

BOOK 8 OF 22

PART A-D

PART A

COURT OF WHITE COUNTY

ARMED FORCES

V. FORD

94-5045

LAWSON

ER02-0725 24278

IN THE CIRCUIT COURT OF WHITE COUNTY, ARKANSAS

vs.

NO. 97-170

FORD MOTOR CORPORATION

COMPLAINT



Comes now the Plaintiff, [REDACTED], by and through his attorney, Lisabeth Lockadoo, P.A., and for his cause of action against the Defendants states as follows:

1. Plaintiff is a resident of White County, Arkansas; Defendant is a company in the business of manufacturing, designing, and selling automobiles in the State of Arkansas with its principal place of business in Michigan; and the equipment malfunction that occurred which Plaintiff alleges was due to the negligence and breach of warranties by the Defendants occurred in Pulaski County, Arkansas.

COUNT I
NEGLIGENCE

2. On or about September 25, 1994, Plaintiff was operating a vehicle made at the St. Thomas plant in Canada by the Defendant as a 1992 Crown Victoria LTD LX 4-door sedan. The vehicle had a VIN of 2FACT74W4NX117322. The Plaintiff was traveling in Jacksonville on that date when the vehicle caught fire and was destroyed.

3. The incident which caused the damages to the Plaintiff was caused by electrical arcing and subsequent overcurrents originating in the conductor from the wiring harness in the dash down to a connector located on the left side panel to the left of the driver.

4. At all times maintained herein, Plaintiff used the vehicle in a manner for which it was intended and in a reasonable and foreseeable manner.

5. The vehicle, as placed in the stream of commerce by the Defendant, was unreasonably dangerous in that it exposed the Plaintiff to the likelihood of fire. This danger was unknown to the Plaintiff until the incident occurred.

6. That Defendant knew or with exercise of ordinary care should have known, that the failing of the conductor would cause electrical arcing and overcurrents which could cause fire was extremely dangerous, and that Plaintiff would not have known of such danger.

7. In the alternative, the automobile, as supplied by the Defendant was unreasonably dangerous in that it exposed the Plaintiff to the likelihood of fire. This danger was unknown to the Plaintiff until the incident occurred.

8. The damages suffered by Plaintiff were a direct and proximate cause of the negligence of Defendant in that:

a) Defendant failed to adequately insure that the conductor would not allow electrical arcing and subsequent overcurrents.

b) Defendant failed to supply the vehicle with the necessary safe guards to stop electrical arcing and subsequent overcurrents when purchased by the Plaintiff.

c) Defendant failed to take reasonable care in placing this vehicle in the stream of commerce.

d) Defendant failed in other acts which are not presently ascertainable, but will become apparent during pretrial discovery.

9. As a direct and proximate result of the foregoing acts of negligence, the Plaintiff suffered damages for property damage in the amount of \$14,952.13.

COUNT II
BREACH OF WARRANTIES

10. Plaintiff adopts all of the allegations contained in Count I above.

11. In connection with the manufacturing, distribution, and sale of the vehicle to the Plaintiff, Defendant expressly and impliedly warranted to the general public and to Plaintiff in particular that said product was safe, merchantable, and fit for the use for which it was intended, and that it contained no undisclosed, latent defects.

12. The said product breached said warranties to the Plaintiff because said product was unsafe, not of merchantable quality, and was unfit for the purposes and uses for which it was intended.

13. Timely and reasonable written notice of the breaches of warranties has been given to Defendant in conformity to the requirements of Arkansas law, including the Uniform Commercial Code.

14. Plaintiff relied on the warranties made by Defendant and was caused to suffer the damages described above as the direct and proximate result of the breach of said warranties by the Defendant.

COUNT III
STRICT LIABILITY

15. Plaintiff adopts all the allegations contained in Count I and Count II, above.

16. At all times pertinent, Defendant was engaged in the business of designing, testing, manufacturing, advertising, and selling the vehicle used by the Plaintiff.

17. At all times pertinent, Defendant was engaged in the business of distributing and offering for sale said vehicle purchased and used by the Plaintiff.

18. The vehicle was defective and unreasonably dangerous at the time it was sold to the Plaintiff and used by the Plaintiff.

19. The Defendant, by manufacturing, distributing, and selling the said vehicle in a defective condition which was unreasonably dangerous to the users thereof, are strictly liable to the Plaintiff for any and all damages resulting from said defective product.

20. As a direct and proximate result of the sale by Defendant to the Plaintiff of said defective and unreasonably dangerous product, the Plaintiff sustained the damages more particularly set forth in Count I, hereof.

WHEREFORE, Plaintiff prays that he have and recover from the Defendant the sum of \$14,952.13, pre-judgment interest at the highest rate allowed by law, his costs herein expended and all other proper relief.

LIZABETH LOOKADOO, P.A.
Attorney at Law
P. O. Box 251354
Little Rock, AR 72225-1354
(501) 663-9441

Lizabeta Lookadoo

LIZABETH LOOKADOO
Ark. Bar No. 88042

WV00510

NAVIS Vehicle Inquiry

08/12/97 15:51:11

-->

VEHICLE ID: 2FMX117322 (WV00510) Vin: 2FACP74W4N117322 Div: 1 Status: 800
Vehicle Line: CFB Convoy Deliv: 030891 Orig P-Lvl: 210 Selling Dlr: 23B205
Order Receipt: 011691 Ship-to Stat: Curr P-Lvl: 210 Sale Date: 051092
Orig Sched: 022591 Rls-To Stat: AR Order Dlr: 23582 Demo Date:
Inv Prep: 021491 Orig Int St: 022291 Orig Rls Dlr: 23582 Deliv Type: 0
Prod Date: 022091 Curr Int St: 022291 Rls Dlr Pd: 05820 Sales Prd: 092052
Rls Date: 022191 Dlr/Fin Ext: 032591 Warr Start: 051092 Cancel St:
Memo Consign: PAC Ext: 032591 Warr End: Sale Status: G
Orig Pitbus: 022191 Advert Ext: 032591 -Date- -Dealer-
Curr Pitbus: 022191 Shipped St#: 4176 Shipped: 022291
T/Memo: 4 Curr Stock: 060491 23B205
Addr: 1st-Prior: 022191 23582
City: BALD KNOB State: AR 2nd-Prior:
Zip: M/A-Recpt: 051492 3rd-Prior:
V.O.: 1 2 3 4 5 6 7 8
1234567890123456789012345678901234567890123456789012345678901234
P74MX3 4 L J2 25B1027 GA D T3 J37 Q7 KH B 23X582 0 ER
8 9 0 1 2 3 4 5 6
567890123456789012345678901234567890123456789012345678901234567890
CI3H 3 W2FAC4 61D 1 113A 9WT A
F1=Help F3=Exit F4=Primary Menu F5=Financial Screen F9=Screen #3

OGDB191

*
* GENERATED BY:
* FRANCIS KIMBER
*
* PHONE: 215-937-8681
*
* JOB: CHECKLIST
*
* DATE: 04/19/97
*
* TIME: 21:14:56
*

PRODUCTION VERSION 2.7

* VEHICLE HISTORY (MH-11) TYPE

* MODEL YEAR : 92
* CUT-OFF DATE : 12/31/97
* REPORT TITLE : CHARGE FOR ALLEN KIMBER
* VEHICLE TYPE : CAR

* REPORT CHAIN TYPE : ALL CHAINS

* OUTPUT FILE NAME : ODEB191.CHARGE.HISTORICAL.REPORT

* REPORT SORT Sequence = PLANT CODE \ SERIAL NO

* PAGE ON PRIMARY SORT:-
* PLANT NO. VALUE

* PLANT/SERIAL SEPARATE = N117822

L139597
PAGE 2.81

1953 KH-11 PARTS BY CONDITION CODE SEGMENT (L139597-270)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FOR ANALYTIC ROUTINE FRANCIS HARRAH

PART NO	CD	COUNT
178578	XL	1
178476	XX	1
19634	XX	1
5230	XX	1
723942	XX	1
723834	XX	1
82242	XX	1

1992-06-11
PAGE 1.01

1992-06-11 PARTS BY CUSTOMER CIRCUIT CODE SUMMARY (1992-06-11)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FOR ALLEN BRADLEY FRANCIS KELLY

PART NO	CCC	COUNT
1780474	AB5	1
1780476	W06	1
19934	CB5	1
22350	W02	1
723942	BA3	1
723954	LB5	1
399423	X93	1

1992-06-11

1882
1882

1882 GM-II PART/CUSTOM CODE DESCRIPTION SUMMARY (188277 C/D)
PARTS ORDERED BY REPAIRING REPAIR CENTER
FOR ALLEN BOYD/FRANCIS KIRKET

NUMBER	PART DESCRIPTION	COUNT	CD-DESCRIPTION	COUNT	CUSTOMER CUSTOM CODE DESCRIPTION (CCD)	COUNT
178678	COMBINED ASY-O/S WIPER	1	40-OPENING/UNKNOWN	1	400-OTHER ELECTRICAL ACCESSORY TROUBLES	1
170476	ACTUATOR W/S WIPER	1	31-DOOR SHUTTER	1	943-DOORS/DOOR FRT/REAR/RH/UNKNOWN-DOOR	1
188276	WINDSHIELD WIPER A/	2	41-UNKNOWN/UNKNOWN	2	410-WINDOWS/WINDSHIELD/AIR CONDITION SYSTEM	2
8220	WINDSHIELD WIPER	1	36	1	140-DOOR NOT OPERATE PROPERLY (LATCHES)	1
703242	RELAY-PT DR TRIM	2	36	1	102-DOOR-UNDR MODE/THROG OF VEHICLE	1
703243	ACTUATOR ASY DR DR	2			105-WINDOWSHLD WIPER TROUBLE	1
800245	SWITCH-FUEL IN LOCK	1			X10-NO APPROPRIATE CUSTOMER CUSTOM CODE	1

1900697 CLAIMS RELATING FOR 1993 MODEL FOR ALVIN RONINSON
PAGE 1 REPORTED BY PLATINUM INSURANCE 10/06/02

1900700 C/O REQUESTED BY:
INSURANCE: PLATINUM 10/06/02 X02400

NOTE: IF THE VALUE HAS (-) THEN CLAIM NOT USED IN THE MATRIX
----- REPAIR INFORMATION -----
4. VEHICLE INFORMATION -----
SERIAL CH# 1/A 2000 FWD NAME KELL CHAIN MFGNO C WCO PART # OF CGC CD REVW TIP RATE MILAGE MILE. TOTAL LBS HRS PT
NUMBER LSC CCI HAN DATE DATA REPAIR NUMBER HOURS E HOURS HOURS CGH COST CGRT HRS MILE
117322 FWD 4LX FWD 8TH 10/06/93 055230|552301 170472 05 772 170472 06 772 06 204003 16 772 23972 37.34 210 3.5 86035 AR
** COMMENTS-CLAIM 61 CGM-605 - REPAIR TIME - INTERMITTENT
TECH-REPAIR SWITCHES REMOVE SWIVELING COLUMN TO REPAIR LOOSE CONNECTION AT SWITCH REPLACE SWIVEL FUNCTION SET
TECH-SWITCH AND REPAIR GOVERNOR.
117322 FWD 4LX FWD 8TH 10/06/93 055230|552301 170472 06 772 170472 06 772 06 204003 16 772 26135 4.00 22 0.0 86035 AR
** COMMENTS-CLAIM 62 CGM-643 - PARK. DOOR PANEL REPAIRS REPAIR SWIVEL - LOOSE
117322 FWD 4LX FWD 8TH 10/06/93 055230|552301 170472 06 772 170472 06 772 06 184003 16 772 26155 61.57 187 1.6 86035 AR
** COMMENTS-CLAIM 63 CGM-626 REAR DOOR BOLT UNLOCK
TECH-REMOVE DOOR BARREL TO REPLACE
117322 FWD 4LX FWD 8TH 10/06/93 055230|552301 170472 06 772 170472 06 772 06 204003 17 772 29841 4.00 45 0.0 86035 AR
** COMMENTS-CLAIM 64 CGM-625 REAR DOOR COMING FROM DASH WHEN DO BLOWN UP
TECH-CHECK FOR BOTTLE IN DASH REMOVE BLOWER MOTOR TO CHECK WHEEL REMOVE AND REPLACE CRACKED BLOWER WHEEL
117322 FWD 4LX FWD 8TH 10/06/93 055230|777711 17067511 0406 17067511 01 772 17067511 04 772 34937 22.98 46 0.5 86035 AR
** COMMENTS-CLAIM 65 CGM-646--REPAIR BLOWING FUSE FOR EXTERIOR LIGHT & DOME LIGHTER--WT
TECH-CHECKED OPERATION OF SOME LIGHTS, FUSE KEEPS BLOWING, FUSE #4-CHEKED POWER MIRROR SWITCH FOR TWO 9214
TECH-92, AND REPLACED SHORTED SECTION.
117322 FWD 4LX FWD 8TH 10/06/93 055230|777711 17067511 01 772 01 17067511 02 772 34937 4.00 13 0.2 86035 AR
** COMMENTS-CLAIM 66 CGM-626--FUEL DOOR RELEASE SWITCH CAME APART
TECH-REPLACED DEFECTIVE FUEL DOOR RELEASE SWITCH
117322 FWD 4LX FWD 8TH 10/06/93 055230|777711 17067511 0406 17067511 02 772 06 17067511 02 772 34937 128.44 370 0.0 86035 AR
** COMMENTS-CLAIM 67 CGM-605--REPAIR SWIVEL-POSS MISC
TECH-WHEEL BURNED IN SWIVEL REPLACED SWIVEL.

THIS LISTING CONTAINS 7 TOTAL CLAIMS

CSOR0097

ModeL II O.R. VIN Customer Selection

06/19/1997 08:29:16

VIN: 2FACP74W4NX117322

Model: CROWN VI

Model Year: 92

To SELECT an O.R. Customer: Type an "X" in the "A" column and Press ENTER

A S Acqd	Last Name	First Name MI	Address	City	St Zip
-	C NEW			BALD KNOB	AR [REDACTED]

F1=HELP F3=EXIT F7=FIRST F8=NEXT
INFO REQUESTED INFORMATION DISPLAYED

OGDB191

CSOR0007

MORE II Dealer Information

06/19/1997 08:36:04

To SELECT a dealer: Type an "X" in the "A" column and press ENTER

A Dealer Name	FD/ LM Address	City	SL Sales St ZN	FCSD Code	SV M Regn P&A	SV N ZN A
X NORIE POINT FOR FD		N LITTLE ROCK AR B	123205	23	06033	A1

F1=HELP F3=EXIT F6=SEARCH F7=FIRST F8=NEXT
I228 SELECT CURRENT DEALER OR F6 FOR SEARCH CRITERIA OR EXIT

OGDB191

CG000027

CG000027 Dealer Personnel Information

06/19/1997 08:36:21

Name: NORTH POINT FORD, INC.
Street:
City: N LITTLE ROCK
State: AR
Zip/PC: 72231 CC: USA

P&A Code: 06033
Sales Code: 123205
SRV/SLS ZM: A1 / B MA:
FCSD Region: 23
MEMPHIS

Dealer Phone: 501 945 1260 Service Phone: 501 945 8240
Service Hours: 7 AM TO 6 PM MON - FRI (FAX) 501-945-8286
Dealer Principal: GERRY RISER
Dealer Principal (Co-Owner) THOMAS F. (MACK) MCCLARTY
General Manager: ASSISTANT GENERAL MANAGER--PAUL RISER
Sales Manager: PHIL MAYFIELD
F and I Manager: MATTHEW PIERI
Customer Relations Manager: DAVID LYNCH
Parts and Service Manager: DAVID LYNCH DEALER MAILING ADDRESS:
Service Manager: DAVID LYNCH P.O.BOX 16090
Parts Manager: JIM LINDSEY NORTH LITTLE ROCK, AR 72231
Special Comments: LSG ENROLLED TOWING (501)988-1684**STREET ADDRESS 4400 LAND

F3=EXIT F6=UPDATE

F66-PRESS "ENTER" TO VERIFY DEALER SELECTION

CG000191

CS000003

MORE II Basic Information

06/19/1997 08:36:42

File Type:

CONTACT NBR: _____

VIN: 2FACP74NANX117322

Last Name:

Title:

Address:

City: BALD KNOB

Home Phone: _____

Year: 92

Mileage/Km: _____

Dealer Name: NORTH POINT FORD, INC.

Sales Code: 123205

Causal Code: _____

Symptoms: _____

Inquiry Code: _____

Serv Sales: (1 or 2)

Arch Code: _____

Comm Type: _____

Micro Nbr: _____

KEYS: 1=HLP 2=VLC 3=EXT 4=CDB 5=ADD 7=CST 8=RCLL 9=ESP 10=OASIS 11=WTY 12=DLR

OGDB191

CSOR0021

NHTSA II Recall Inquiry

06/19/1997 08:37:03

VIN: 2FACP74W4NX117322
Year: 92 Model: CROWN VICTORIA

Build Date: 02/20/1991
WSD: 05/10/1992

Campaign Number	Campaign Type	Description	Campaign Status	Status Date	Dealer Code
		1864			

F3+EXIT
2000 NO RECALLS FOR THIS VEHICLE

OGDS191

CSOR0024

MOSS II OADS Inquiry

06/19/97 08:37:13

VIN: 2FACV4N4NX117322

Year: 92 Model: CROWN VICTORIA

Name: [REDACTED]

Calib: 218AR00

Build Date: 02/20/1991

Recall Description

Axle: NOT AVAILABLE

WSD: 05/10/1992

NO RECALLS

Engine: 4.6L SOHC (MODULAR)

Trans: AUTOMATIC OD 4 SPEED OMP Count: 0

Message:

ESP INFORMATION: Plan Option		Expiration	Signature					
YR	Code	Date	Mi/km	Date	Rent	Days	Tow	Ded
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EXPIRED								

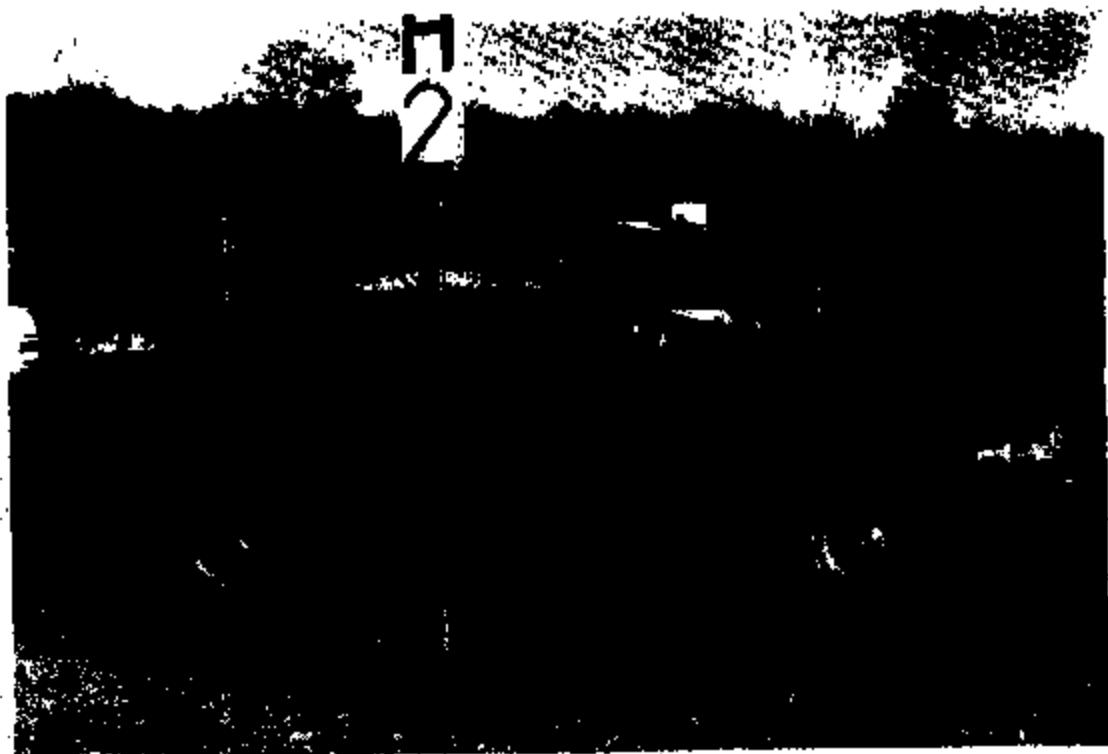
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ER02-028-2002



2000-020 20220



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1st April

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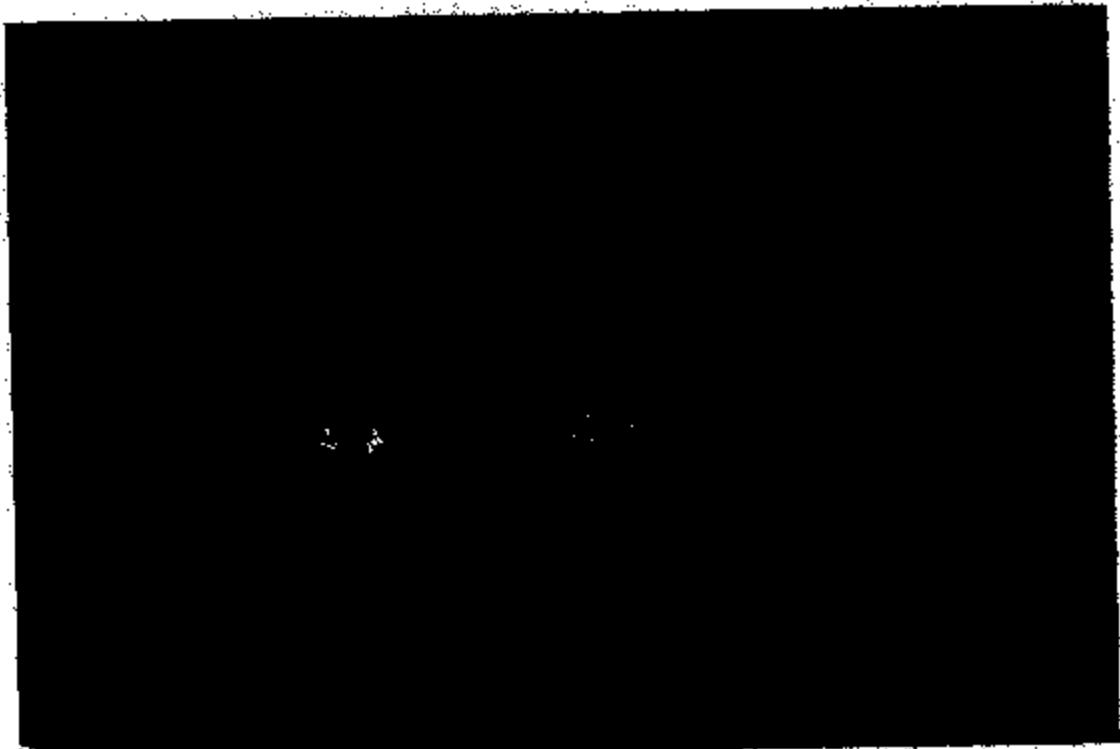
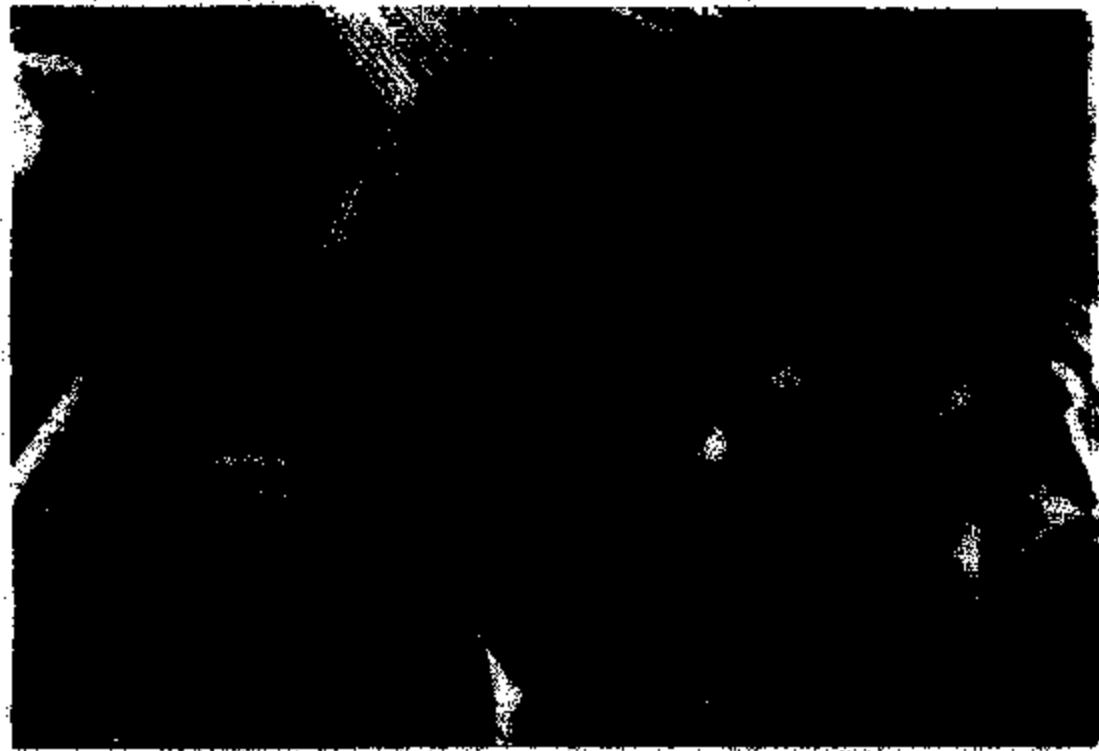


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2002-025 28381



0002-025 20002



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E982-826 26382



ENR-625 25364



0002-025 20205



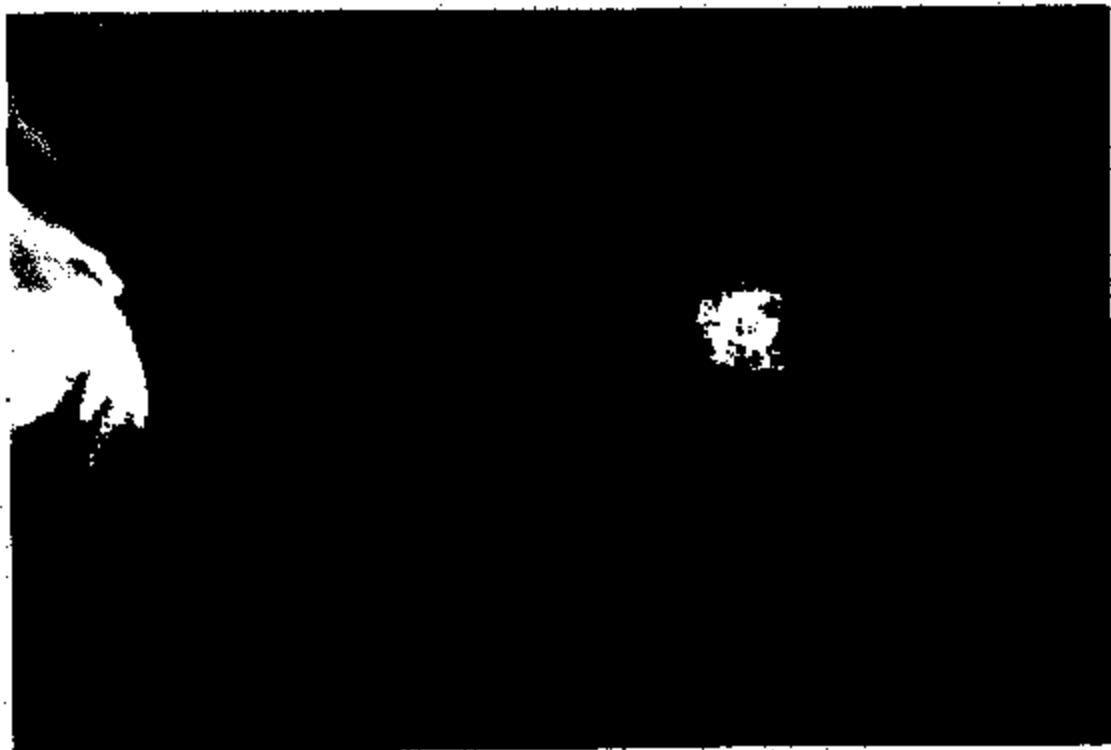
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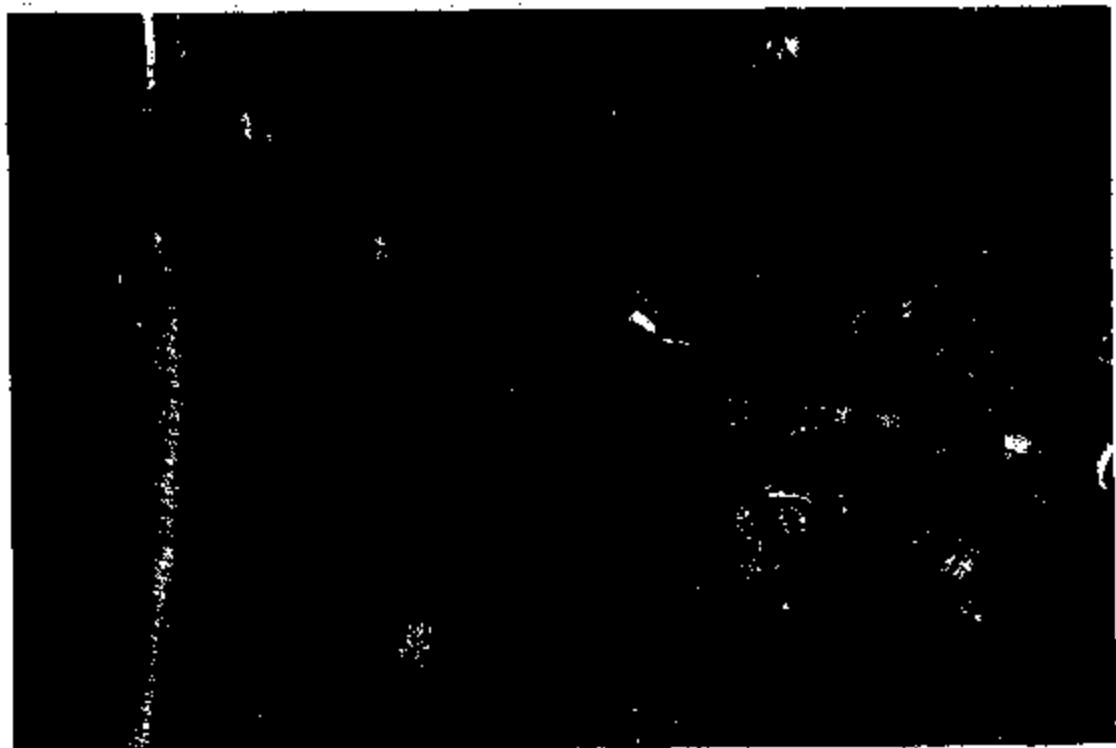
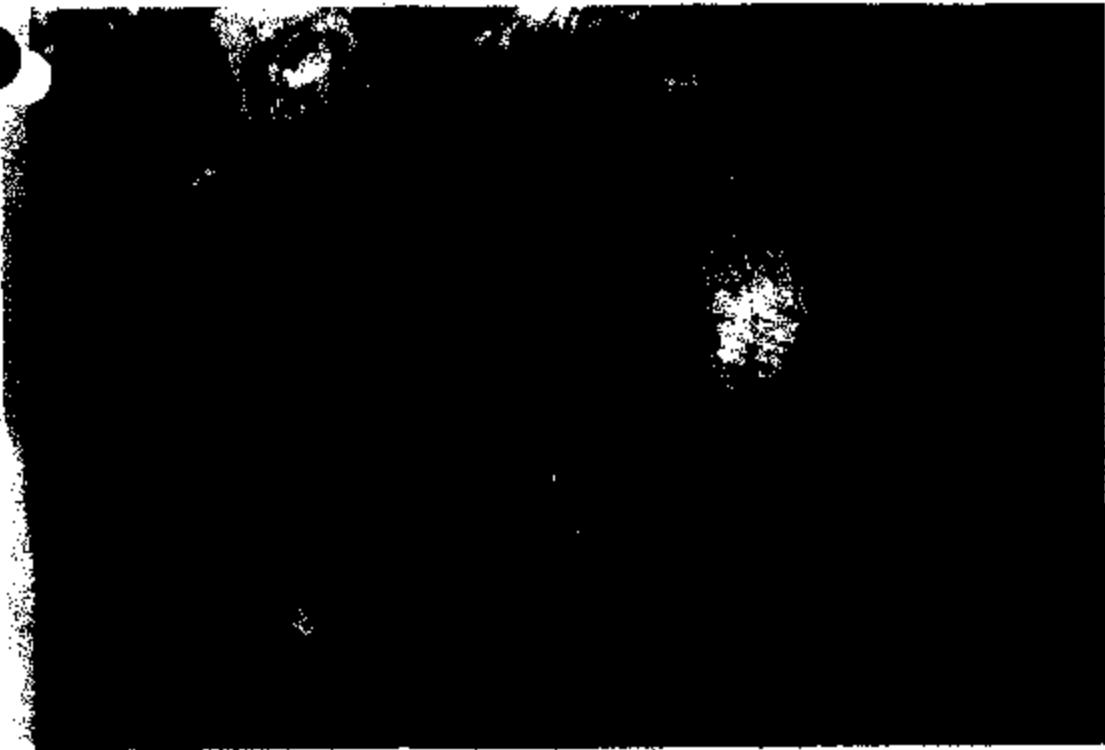


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EMB-625 24300



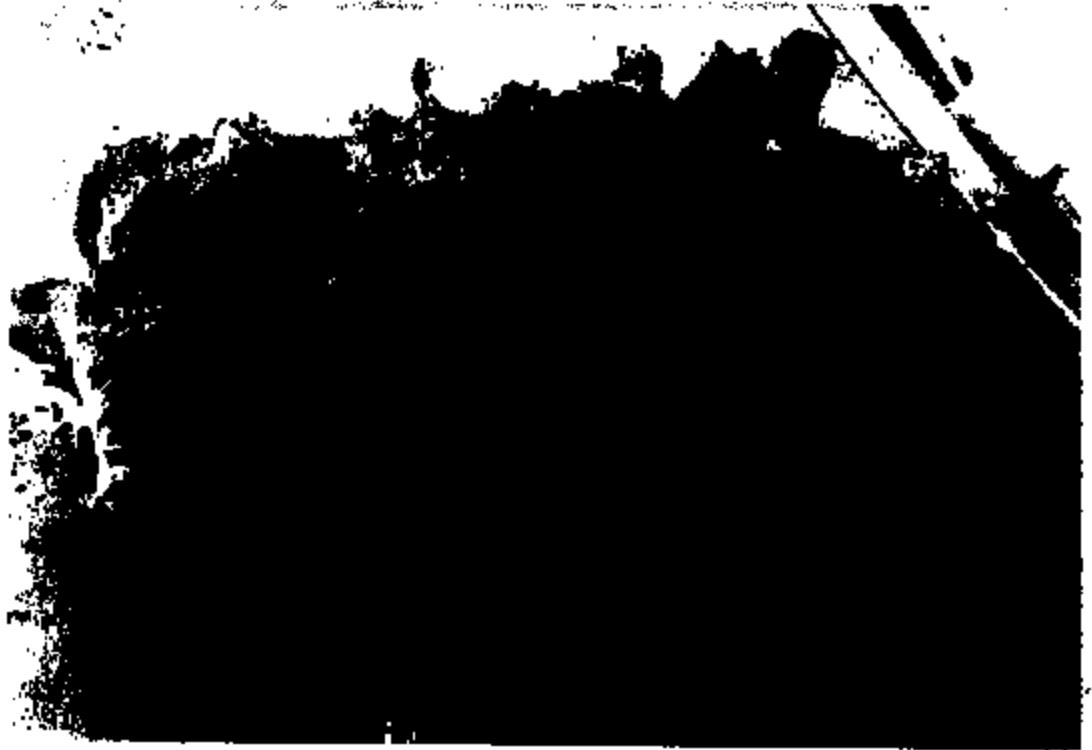
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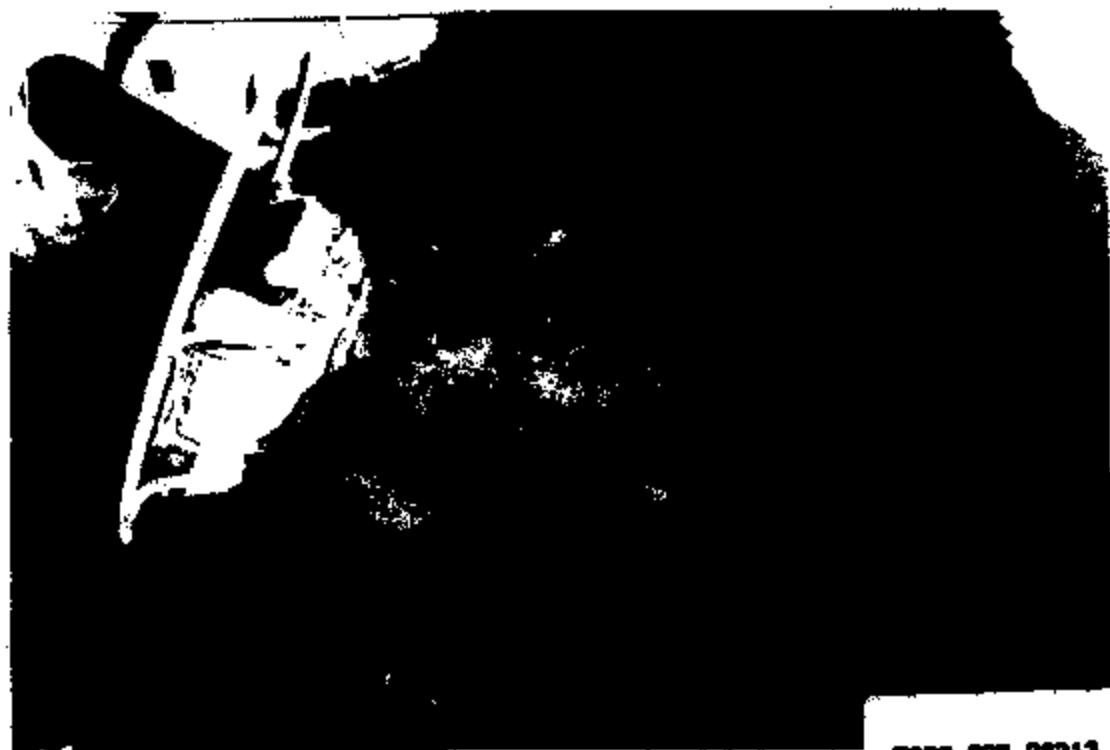
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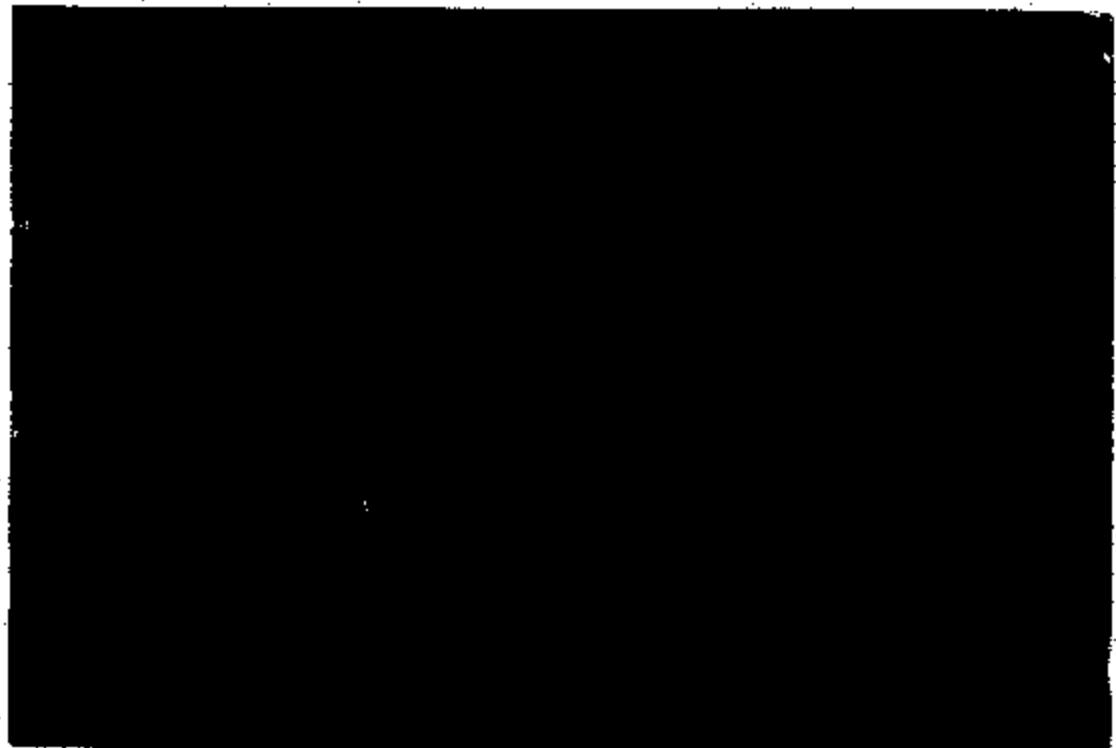
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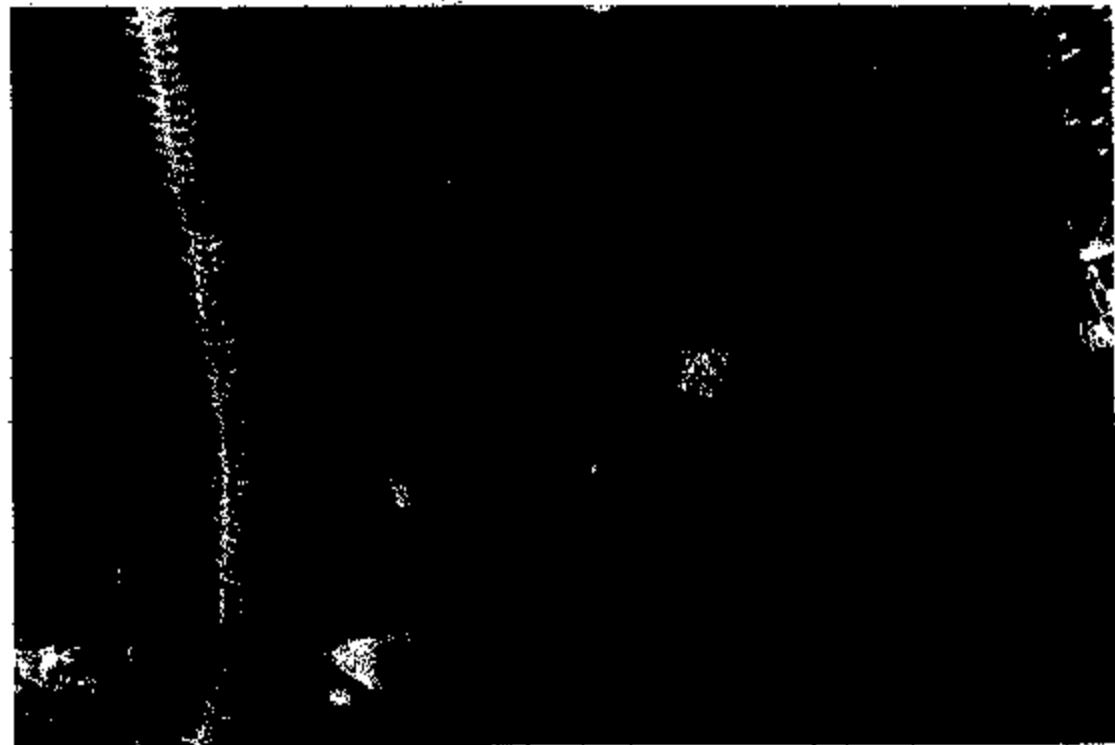
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2002-025 20313



2002-025 28314



36

ER02-025 28315



2002-025 23310



40

E982-828 28317



E002-025 26316



ENR-625 20310



46



ENR2-025 26021

BOSWELL TUCKER & BREWSTER

ATTORNEYS AT LAW

BRYANT CENTER

POST OFFICE BOX 788

BRYANT, ARKANSAS 72022-0788

TELEPHONE
LITTLE ROCK AND BRYANT
(501) 647-3031

BRYTON
(501) 778-8873

FAX (501) 647-4284
DONNA HOLLOWAY, PLS
ADMINISTRATOR

April 3, 1995

file

Helmman Management Services, Inc.
P.O. Box 8001
Novi, Michigan 48376-8001

Attn: Laurie Shotwell

Re: Claim No.: [REDACTED]
DOL: 9/25/94
Our Insured: [REDACTED]
Your Customer: Ford Motor Company
Your File No.: P 440-063603-01

Dear Ms. Shotwell:

Because of Ford Motor Company's delay in paying for the damages to their insured's vehicle as a result of the malfunction that caused the fire, State Farm Mutual Automobile Insurance Company has retained this law firm to represent them in this matter and to pursue their legal rights in the name of their insured under all applicable legal theories.

Your February 15, 1995, letter to Mr. Joe Langley at State Farm indicated that you had submitted your file to Ford for review and evaluation. Please let me know if Ford intends to honor State Farm's claim. Also, please be aware that pursuant to Arkansas Code Annotated § 4-2-607, we are giving notice that the damages to the insured's vehicle were the proximate result of a breach of implied warranty of merchantability and implied warranty of fitness for a particular purpose.

Thank you for your prompt attention in this matter.

Sincerely yours,


David E. Dawson

.DBD/jo

cc: Ford Motor Corporation
Office of General Counsel
Park Lane Tower W, Suite 1513
Dearborn, Michigan 48121

800-925 2832

George H. Price, Jr., P.E.
President

John A. Price, P.E.
Vice President
Howard E. Gammie
Vice President
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John R. Morris, Jr.
Larry W. White



PETTIT & PETTIT
Consulting Engineers, Inc.

Hollings West Building, Suite 400
201 East Markham Street
Little Rock, Arkansas 72201-1001
Telephone (501) 374-5751
Faxline (501) 374-1002

January 6, 1995

Mr. Joe Langley
State Farm Insurance Companies
#215 Branch Drive
Little Rock, Arkansas 72212

RE: Our Job No. 95-01

Your Claim No. [REDACTED]

Insured: [REDACTED]

Bald Knob, Arkansas

Date of Loss: September 25, 1994

Dear Mr. Langley:

Pursuant to your request, on January 5, 1995, I visited Mid-Ark Salvage Company on Highway 64 East, Vilonia, Arkansas, and inspected a 1982 Crown Victoria vehicle involved in a fire. The vehicle identification number was 2FACT74W4NX117322. The vehicle was made at the St. Thomas plant in Canada by Ford as a Crown Victoria LTD LX 4-door sedan. The vehicle was equipped with air bags; active belts; and a 2.8 liter V-6, fuel-injected engine. The sequential production number was 117322.

The Insured reported that he was driving down the road when burning plastic dripped on or near his left foot. He reported he had taken the vehicle three or four times to North Point Ford due to electrical problems, and they had only replaced a fuse during those times. The blown fuse went to the keyless entry, dome light, vanity light, and power doors. He reported that this fuse had been blowing, and all they did was replace the fuse.

The interior of the passenger's compartment was heavily burned by the fire. There was no or little burning within the engine compartment itself. The battery was in fair condition with some corrosion at the battery terminals. The battery voltage was measured to be 12 volts, indicating that it was somewhat in a discharged state apparently from a short circuit. The tires were unburned on the vehicle. The right rear tire was flat but unburned. The top of the passenger's compartment was

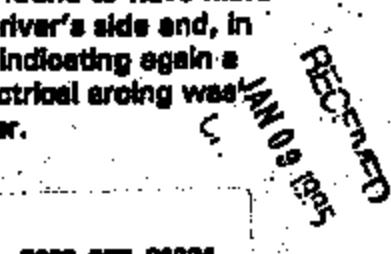
Mr. Joe Langley
Page 2

Our Job No. 95-01
January 6, 1995

heavily oxidized near the front. The windshield trim was more heavily damaged on the driver's side than on the passenger's side, as was the top of the passenger's compartment above the driver's side. All glass around the passenger's compartment was broken. Heavy soot accumulation was on the inside of the glass, indicating a smoldering-type fire inside the vehicle with the windows rolled up. There was a low burn apparent from the outside on the driver's door. The passenger's front door did not have a similar burn. The trunk was inaccessible; however, it appeared that the trunk was unburned, and there was no evidence of fire originating in the trunk spreading out to the vehicle.

The fire-flow patterns were from the driver's side of the interior back toward the rear seats. The rear seats were partially burned but were not completely burned as the front seats were. All doors were closed at the time of the fire, except the front right door was open at the time of the fire, as evidenced by the lack of burning on the front right door and the amount of adjacent burning on the door frame. There were more remnants of combustible products on the passenger's side of the dash than on the driver's side, again, indicating a fire origin on the driver's side. The front fiberglass on the hood had been busted by someone apparently to gain entrance to the hood latch. The dash metal support was more oxidized on the driver's side than on the passenger's side. There was a low burn down to the left side panel on the driver's side. The driver's door was only partially burned. The conductors within that door had a lot of insulation left on them, while conductors in the area of the origin had the insulation totally consumed, indicating the fire did not originate within the door. There was no evidence of electrical arcing on the conductors within the driver's door.

The electrical equipment within the driver's seat was examined. There was no evidence of electrical arcing within the electrical equipment within the driver's seat. The steering wheel combustibles were more consumed on the driver's left than on the right side of the steering wheel, indicating a fire origin to the left of the steering wheel. More remnants of combustible products of the dash appeared on the passenger's side than on the driver's side, indicating a fire origin at the driver's side. The floor was mostly unburned, except it was scorched by molten products falling down. The engine wall insulation was more consumed to the left of the steering wheel than in other areas, again, indicating a fire origin to the left of the driver. The emergency brake pedal, brake pedal, and accelerator pedal were heavily oxidized by the fire. The driver's mirror was partially burned, while the passenger's mirror was not. The main dash wiring harness was examined for any possible evidence of electrical arcing. The wiring harness was found to have more insulation on conductors on the passenger's side than on the driver's side and, in particular, more than on the right side of the steering wheel, indicating again a fire origin to the left of the steering wheel. No evidence of electrical arcing was found within the main wiring harness, except as mentioned later.



Mr. Joe Langley
Page 3

Our Job No. 95-01
January 8, 1995

All other electrical components within the dash were examined for any possible evidence of arcing. The fuse panel was heavily burned by the fire, such that the fuses were melted and the circuit breakers were heavily oxidized. There was no evidence of electrical arcing or other failure within the fuse panel. The instrument panel was examined. It was heavily burned on the front and back. There was no evidence of electrical arcing or other electrical failure on the metallization circuit of the instrument panel.

On the side kick panel to the left of the driver was found a stranded copper conductor that was approximately a No. 18 AWG conductor that had evidence of beading and arcing. The conductor was severed with beaded ends, indicating electrical arcing had occurred at this location. The conductor that had failed came from the wiring harness in the dash down to a connector located on the left side panel to the left of the driver. The electrical arcing was located near the low point of the fire and near the origin of the fire.

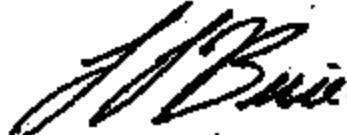
In conclusion, it is my professional opinion that the most probable cause of the fire is the electrical arcing and subsequent overcurrents found on the aforementioned conductor. Enclosed for your use are my photographs.

I have the failed conductor in my possession. Please be advised that this evidence will remain in storage at our facility for a fee of \$15.00 per month, billed quarterly, until we receive your written instruction regarding its disposition. Because this detail is often overlooked, please let us have your advice promptly.

Please call if you have questions or need additional information.

Sincerely yours,

PETTIT & PETTIT



L. L. Bule, Jr., P.E.

LLB/db
Enclosures

RECEIVED
JAN 09 1995

1062-625 28325

FEB-16-96 WED 09:51

NORTH POINT SUPERSTORE

P.07

912033

01-63-286-6

P.O. BOX 1010
005001

2400 LARSON DR.

HOME:

2085

PAGE 1

4400 LARSON RD. • R. L. B. AP: 2077 0010 0404000

SERVICE ADDRESS: 3620 PARK ROAD

	92	1992 FORD F150 VICTORIA	29841/29842/117122		29841/29841	
--	----	-------------------------	--------------------	--	-------------	--

1000192	2000001	WMT 2984093	45.13	LABOR	2984093
---------	---------	-------------	-------	-------	---------

OPTION: STK:1912093	ILE:21M01	MP:4.60			
---------------------	-----------	---------	--	--	--

07-06 2984093 08:53 2984093	LND: 21M02	05-10-97/78020 MILES 3.100H 145			
-----------------------------	------------	---------------------------------	--	--	--

TIME: DRIVING 1.770 3.700	S/HR	COST: HRS 0.500 TIME 1.770			
---------------------------	------	----------------------------	--	--	--

BLower OR					
-----------	--	--	--	--	--

CODE: 01-A	PC: 0.50 0.50	945 1000	48.42	48.42	
------------	---------------	----------	-------	-------	--

A/C BLOWER	351 456	0 5.85 6.85 6.85			
------------	---------	------------------	--	--	--

CLAIM TYPE:					
-------------	--	--	--	--	--

ITEM CODE: 01-A	PC: 0.50 0.50	945 1000	48.42	48.42	
-----------------	---------------	----------	-------	-------	--

REASON: 1. CRACKED BLOWER WHEEL REMOVE AND REPLACE BLOWER MOTOR TO CK WHEEL REMOVE AND REPLACE					
--	--	--	--	--	--

VERSION: 2 (REV: 3, 1984093 08:37); PC 08 PZ 19834 REV: MT 29841 M: 0.9					
---	--	--	--	--	--

REASON: 2. CRACKED BLOWER WHEEL REMOVE AND REPLACE CRACKED BLOWER WHEEL					
---	--	--	--	--	--

VERSION: 3 (REV: 3, 1984093 08:37); PC 08 PZ 19834 REV: MT 29841 M: 0.9					
---	--	--	--	--	--

REASON: 4. CRACKED BLOWER WHEEL REMOVE AND REPLACE CRACKED BLOWER WHEEL					
---	--	--	--	--	--

*** WARRANT CLAIM #41523 LINE (S) :A

DATE : START : FINISH : DURATION : TYPE : TIME : LINE (S)

09-29-95 140730 140930 01:53:00 01:53:00 01:53:00 01:53:00
--

AMOUNT: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00
--

PARTS: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00

LABOR: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00

TOTAL: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00

COST: SALES & COMP: TOTAL: 1296 4518 0
--

SERVICE INSTALLED PARTS: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00

SALES TAX: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00

AMOUNT: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00
--

AMOUNT: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00
--

AMOUNT: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00
--

AMOUNT: CASH: 0.00 0.00 0.00 0.00 0.00 0.00 0.00
--

ACCOUNTING COPY

5902-025 28386

FEB-15-95 WED 09:55

NORTH POINT SUPERSTORE

P.08

912035

77771

TWO USE ONLY
006001

TWO USE ONLY

BALD KNOB AR

BUS:

DUPLICATE

PAGE 200

4499 VINYL NO. C-P-L-A-AP-2007-0001-000-000



SUB-ADVISOR



SERVICE ADVISOR: 8493 KATE SMITH

SR.	92 FORD CROWN VICTORIA	WEACP74M00X117322	34937/34937	TSC
SR. DATE	0405-BATTY TONY-0405-0405-0405-0405	ITEM NO. 4062-214-40-62-0405	ITEM NO. 4062-214-40-62-0405	ITEM NO. 4062-214-40-62-0405
1004892	2078801	WATE 1204A94	45.13	BAR
VERSION 1 (EMW 103,1204A94,17:20):	OPTION: BTM:912035 DLB:231205 EBG:4.6L SONIC	218AR00A TRN: AUTO CD AXL:3 1) 92 EXP. PREMIUM \$50		
07142, 1204A94, 16:22, 1004892	CDG: 21EXP DE-10-97/75000 MILES 3) TOW \$65 (More)			
LINIE OCCIDE TWO TYPE A/MRS S/EPS . COST SAW. COUP LIST	VERSION 1, (EMW 103,1204A94,17:20):			
9-03: REPLACED BROKEN FUEL DOOR RELEASE SWITCH	VERSION 2 (EMW 103,1204A94,17:20):	34937 REPLACED BROKEN FUEL DOOR RELEASE SWITCH		
REPLACE SWITCH	VERSION 3 (EMW 103,1204A94,17:20):	34937 REPLACED BROKEN FUEL DOOR RELEASE SWITCH		
EMW 1002 -- EXHAUST MANIFOLD	EMW 103,1204A94,17:20: 34937			
CAUSE: 56				
EMW 5230A MUFFLER (45230) REPLACE, ONE				
28 T.5 LIC# 7648				
0405-BATTY TONY-0405-0405-0405-0405				
PF: 56				
PARTS: 9957 12944 TP015				
COINT: 9957 12944 TP015				
CLAIM TYPE: 4499				
ATTN CODE: D				
7648				
VERSION 1. (EMW 25,1204A94, 17:20): HOLES RUSTED INTO MUFFLER. 5230A 0.9				
#40-62-94-937 REPLACED MUFFLER				
VERSION 2 (EMW 103,1204A94, 17:20): 34-937 REPLACED MUFFLER.				
VERSION 3 (EMW 6303,1204A94,16:21): 34-937 REPLACED MUFFLER. NOISE.				
IF WARRANTY REPAIRS WERE PERFORMED ON YOUR VEHICLE, YOU MAY BE RECEIVING A SURVEY FROM FORD MOTOR CO. WE WOULD APPRECIATE YOU TAKING THIS TIME TO COMPLETE AND RETURN THIS SURVEY, AS THIS IS OUR REPORT CARD. PLEASE CHECK JO IF FOR SOME REASOS YOU CANNOT CONTACT YOUR SERVICE ADVISOR. THANK YOU FOR YOUR BUSINESS.				
*** WARRANT CLAIM #50594 LINE(S): AMERIC				
DURUS START FINISH DURATION TYPE TECH LINE(S)				
SERVICE INSTALLED PARTS			AMOUNT COLLECTED	AMOUNT APPLICABLE TO PURCHASE
DESCRIPTION	AMOUNT RECEIVED	AMOUNT APPLICABLE		
0405-BATTY TONY-0405-0405-0405-0405				
STATEMENT OF CHARGES			LABOR AMOUNT	
0405-BATTY TONY-0405-0405-0405-0405			PARTS AMOUNT	
0405-BATTY TONY-0405-0405-0405-0405			GAS, OIL, LUBE	
0405-BATTY TONY-0405-0405-0405-0405			FREIGHT AMOUNT	
0405-BATTY TONY-0405-0405-0405-0405			ENVIRONMENTAL AMOUNT	
0405-BATTY TONY-0405-0405-0405-0405			TOTAL CHARGES	
0405-BATTY TONY-0405-0405-0405-0405			LINE INSURANCE	
0405-BATTY TONY-0405-0405-0405-0405			BADGE TAX	
0405-BATTY TONY-0405-0405-0405-0405			POLICE TAX	
0405-BATTY TONY-0405-0405-0405-0405			CHARGE PAY THIS AMOUNT	

ACCOUNTING COPY

5902-025 28332

4

N-1-3-0

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE

03 JUL 31 PM 3:28

Plaintiff, }
v. }
FORD MOTOR COMPANY, }
Defendant. }

NO. 113-C-1309

PLED IN OFFICE
PAULA E. THOMPSON, CLERK
BY A.C.D. DC

COMPLAINT

COMES now the Plaintiff, [REDACTED] through counsel, and for its cause of action against Ford Motor Company, and states to the court as follows:

1. The Plaintiff, [REDACTED] is a resident of Chattanooga, Tennessee.
2. The Defendant, Ford Motor Company, is in the business of manufacturing, sale and distribution of automobiles. The Defendant is incorporated in Michigan with its primary place of business in Dearborn, Michigan. The Defendant's registered agent is listed as CT Corporation System, 530 Gay Street, Knoxville, TN 37902

JURISDICTION

3. Jurisdiction in Tennessee is proper under T.C.A. §20-2-214 effecting personal service on those parties not located within the state of Tennessee.

Further jurisdiction is proper in this case as the claim exceeds \$100,000.00. The amount is One Hundred Dollars and No Cents (\$100,000.00), exclusive of costs and interests, and all parties are residents of or do business in Hamilton County, Tennessee.

5. Venue in this matter is proper under T.C.A. §20-4-104 because Defendant, Ford Motor Company, has offices which transact business within Hamilton County, Tennessee.

FACTS

6. At all times relevant to this action, Plaintiff Insured, [REDACTED], resided at [REDACTED] Chattanooga, Tennessee [REDACTED]
7. On the evening of August 9, 2002, [REDACTED] home suffered severe smoke and heat damage resulting from a fire in the carport of his home.
8. [REDACTED] 1993 Lincoln Town Car, which was parked in the carport at the time, appeared to be in good working order, and had undergone routine service checks within six (6) months of the accident.
9. An investigation on August 14, 2002, revealed that the fire originated in the engine compartment area of the 1993 Lincoln Town Car on the left side of the vehicle.
10. Further investigation indicated that the cause of the fire was a faulty speed control deactivation switch, and that the ignition source within the vehicle was electrical.
11. Defendant Ford Motor Company previously issued a voluntary safety recall of the 1993 Lincoln Town Car, because the cruise control or speed-deactivation switch was prone to short circuit, creating a potential for fire, whether the car was running or shut off.
12. Ford Motor Company was to issue recall notifications via U.S. Postal Service beginning May 24, 1999.
13. Upon its purchase in 2000, this deactivation switch in Mr. Glenn's 1993 Lincoln Town Car had not been replaced, nor had [REDACTED] been notified of the defect.
14. Upon information and belief, Defendant Ford Motor Company failed to issue a product defect warning or recall notice to any owner of the 1993 Lincoln Town Car with VIN No. 1LNLMB1W9PY724232.
15. The proximate cause of the fire and the resulting damages was Defendant's manufacturing of a defective product, to wit: faulty speed control deactivation switch, and

negligent failure to warn Plaintiff of the potential hazards associated with the 1993 Lincoln Town Car speed control deactivation switch.

16. As a direct and proximate result of the Defendant's conduct, Plaintiff suffered severe damage to his real and personal property and suffered other losses, all in an amount in excess of Fifty Thousand, Five Hundred Thirty-Nine Dollars and Thirty Cents (\$50,539.30).

COUNT I - STRICT PRODUCT LIABILITY

17. Plaintiff incorporates by reference each and every allegation set forth in Paragraph Nos. 1 - 16.

18. The Defendant is a manufacturer of the 1993 Lincoln Town Car in that it is the designer, fabricator, producer or assembler of the product or its component parts.

19. Defendant Ford Motor Company is liable for the defect in the 1993 Lincoln Town Car because the product was in a defective condition and/or unreasonably dangerous at the time it left the control of the manufacturer.

20. Plaintiff's vehicle was unreasonably dangerous to an extent beyond that which would be contemplated by the ordinary user who purchased the vehicle.

21. The 1993 Lincoln Town Car was in a condition that rendered it unsafe for anticipatable handling by [REDACTED]

22. As a direct and proximate result of the defective condition and/or unreasonable safety of the vehicle, the Plaintiff sustained the aforementioned damages, all in an amount not less than Forty-Seven Thousand, One Hundred Thirty-One Dollars and Twenty Cents (\$47,131.20).

COUNT II - NEGLIGENCE

23. Defendant Ford Motor Company had a duty to warn its customers and the purchasers of its products of the potential safety hazard involved with the 1993 Lincoln Town Car, and to explain the procedure for remedying such.

24. Defendant, by and through its agent and employees, failed to inform Plaintiff of the defect in the speed control deactivation switch installed in the 1993 Lincoln Town Car.

25. As a proximate result of Defendant's negligence, the faulty speed control deactivation switch on the 1993 Lincoln Town Car was not replaced, and the defective vehicle was driven until the fire on August 9, 2002.

26. As a direct and proximate consequence of Defendant's negligent failure to warn, the Plaintiff suffered damages in an amount not less than Forty-Seven Thousand, One Hundred Thirty-One Dollars and Twenty Cents (\$47,131.20) when the defective part ignited a fire which damaged the home of the insured.

WHEREFORE, Plaintiff prays for judgment against the Defendant in the amount of Forty-Seven Thousand, One Hundred Thirty-One Dollars and Twenty Cents (\$47,131.20) together with prejudgment interest, the cost of this action, attorney's fees, treble damages, and such other and further relief as this court deems necessary and proper.

Respectfully submitted,

LUTHER-ANDERSON, PLLP

By: Christi R. Satterfield
CHRISTI R. SATTERFIELD, BPR #21289
Attorneys for Plaintiff
1101 Market Street, Suite 600
Chattanooga, TN 37401
(423) 755-5034

CSCN140

VEHICLE DATA

08/13/03 10:38:53

==>
ENTER VIN ==> 1LNLM81W9PY724232
NAME ==> SMITH ZIP ==> 373984035 MODEL YR ==>
OWNER NAME : [REDACTED]
STREET ADDR :

CITY : WINCHESTER

N/A YY-MM-DD 96-06-27

ST/PRV: TN CTRY:

N/A SOURCE: P

MODEL YEAR : 93 PLANT: Y

SALE YY-MM-DD 93-03-30

BODY STYLE DESC: 4 DR SEDAN

PRODUCTION YY-MM-DD 93-03-12

VEHICLE DESC : 1993 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	PCSD REGION
SHIP-TO	3	88	H	206	45	CC
FACING	3	25	J	731		
RESPONSIBLE	3	26	J	412		

CA EMISSION : ENGINE TAG CODE : 3G812AA 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

OGDB432

EM2-025-5 15575

CSCN150

CAMPAIGN VEHICLE INFORMATION

08/13/03 10:39:01

REC>

ENTER CAMPAIGN NUMBER-->
MODEL YEAR: DEFECT:VIN--> 1LNLM81W9PY724232 TYPE OF SEARCH: A
BODY STYLE:

NEW STATUS CODE:

CAMP DIV :

REPAIR INFORMATION:

SUPP CODE :

REPAIR DATE:

TYPE CODE:

KIT CODE :

MICRO REP:

DEALER P/A:

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)

CGDB432

EAB2-525-3 100775

CSCN130

NOTIFICATION RECIPIENT HISTORY

08/13/03 10:39:04

ENTER CAMPAIGN NR >> VIN ==> 1LNLM81W9PY724232
DEFECT : BODY STYLE DESC:
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 : ST/PRV:
CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE: 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 : ST/PRV:
CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE: YY-MM-DD
F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140
E504-CAMPAIGN FOR THIS VIN NOT FOUND OGDH432

CSCN150

CAMPAIGN VEHICLE INFORMATION

08/13/03 10:39:07

ENTER CAMPAIGN NUMBER=> 96L12 VIN=> 1LNLM81WSPY724232 TYPE OF SEARCH: A
MODEL YEAR: 93 DEFECT: PASS AIR BAG BODY STYLE: 4 DR SEDAN

NEW STATUS CODE:

CAMP DIV : 6

REPAIR INFORMATION: TYPE CODE:

SUPP CODE :

REPAIR DATE:

DEALER P/A:

KIT CODE : CI

MICRO REF:

CLAIM NUM:

OASIS DATE :

DELETE REASON:

VENDOR N/A INFORMATION:

RESP DEALER INFORMATION: NEW:

IND: MATCH CODE: 2

CURRENT: 3 26 412 ASSIGNED: 96-12-19 SOURCE: PX

EXTRACT DATE: 96-12-19

***** 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

CGDB432

CSCN130

NOTIFICATION RECIPIENT HISTORY

08/13/03 10:39:09

ENTER CAMPAIGN NBR ==> 96L12 VIN ==> 1LNLM81W9PY724232
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DR SEDAN
RESP DEALER : 326412 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 : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS: TC
STREET ADDR1 : ST/PRV: TN
ADDR2 :
CITY : WINCHESTER CTRY:
ZIP/POSTAL CODE: ***** N-A SOURCE: P N-A EFF DATE: 96-06-27 YY-MM-DD

RESP DEALER : BEGINNING MAILED DATE: YY-MM-DD
RELEASE DESC : ENDING MAILED DATE : YY-MM-DD
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 : ST/PRV:
ADDR2 :
CITY : CTRY:
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 CGDB432

CSCN150

CAMPAIGN VEHICLE INFORMATION

08/13/03 10:39:12

==> ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LNLM81W9PY724232 TYPE OF SEARCH: A
MODEL YEAR: DEFECT: PASS AIR BAG 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)

E607-END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES

OGDB432

CUSTOMER NAME/PHONE NUMBER
[REDACTED]

Previous Owner:

CUSTOMER LIST

ADDRESS
[REDACTED]

WINCHESTER TN [REDACTED]

STATUS
No Open Issues

Customer Info

Customer: [REDACTED] Primary Phone: [REDACTED] Secondary Phone: [REDACTED]

Address: [REDACTED] TN: [REDACTED]

Country: USA Language: EN

Cell Phone: Pager:

Preferred Contact method: Fax:

Preferred Contact Time: Email: TOMSMITH@CAFAS.NET

Vehicle List				
VIN	Year	Model	Sales Type	Owner Status
1LNLM81W0PY724232	1993	TOWN CAR	INDIVIDUAL RTL	Subsequent Owner
2MEFM75W7X0727912	1999	GRAND MARQUIS	INDIVIDUAL RTL	Original Owner

No Open Issues
No Open Issues

Vehicle Info
Oasis
Warranty History
Oasis
Warranty History

04/13/2003
10:40:26**OASIS RESULT:****1LNLM81W9PY724232**

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► Errors

VIN OUTSIDE OF SUPPORTED MODEL YEAR RANGE
ALL APPLICABLE F.S.A. WILL DISPLAY

► FIELD SERVICE ACTIONS

NO CAMPAIGN MESSAGE(S) FOUND

► EXTENDED COVERAGES

NO ESP INFORMATION AVAILABLE

► REPAIR HISTORY

NO REPAIR HISTORY ON VEHICLE

END OF OASIS REPORT FOR 1LNLM81W9PY724232

ESP / Recall Information

VIN: 1LNLM81W9PY724232

No ESP Information for this VIN

Recall Information:

Number	Type	Description	Campaign	Status	Date	Dealer Code
92B64	O	RANGE SENSOR		COMPLETE		
93L12	L	PASS AIR BAG		FORCED COMPLETION	1998-01-22	12045 AUTOC

Vehicle Information Report

GENERAL VEHICLE INFORMATION: (Related Claims)

VIN:	1G1LM4WV9Y72432	Vehicle:	CIV - TOWN CAR (PN342PN16) [91-97]	Eng Serial No:	W
Model Year:	1993	Market Dev/Prod:	CM - MERCURY DIVISION DERIVATIVE	Body Style:	*
Vehicle Type:	C	Drive Code:	CB - 2 WHL LH REAR DRIVE	Options:	CVN - 8-10 4.6L SONIC BPI NA CTV GNP
Inv. Dealer:	11661	Body Cab Style:	CPC - 4 DOOR SEDAN-4 LITE	Transmission:	CDE - 4 SPD AUTO TRANS NA/NO MODE
		Variant/Series:	CAB - BASE VERSION - CAR		

BUILD INFORMATION:

Region: NA - WIXOM Plant: BA - WIXOM PLANT BUILD
Country: USA - WIXOM Plant Date: 12-MAR-1993

SALE INFORMATION:

Region: NA - WIXOM Sales Dealer: 325731 - *
Country: USA - WIXOM Sales Div: SALES PL
Sales Div: NY
Arrival Date: 23-MAR-1993 Bed Carpet Lease: *
Sale Date: 30-MAR-1993 Fleet/Business Lease: *
Warranty Start Date: 30-MAR-1993 Merchant Vehicle: *
Orig Warranty Date: 30-MAR-1993 Unspecified Vehicle: * Vehicle Export Flag: N

VOC/EOC:

1 2 3 4 5 6 7 8 9
M1257314323 CL 1419C7108 0X 0 TWT 32 4 3000 0 325731 0 AXE 32 X X

1419C7108 0X 0 TWT 32 4 3000 0 325731 0 AXE 32 X X

INSTALLED OPTION INFORMATION:

Air Conditioning	CIC - ATC AIR CONDITIONER	GVM Code	
Antenna Amp Rating	* - [N/A]	GVM Class Code	L
Audio Data	* - [N/A]	Instrumentation	AC - ELECTRONIC INSTRUMENTATION
Auto Rader	EQACC - 3.04 FINAL DRIVE RATIO	Driver(Driver Side)	* - [N/A]
Auto Trans	EQIAC - LIMITED SLIP BEAR AXLE	Driver(Passenger Side)	* - [N/A]
Battery Amp Rating	72	Pilot	PNEER - MID CLANBERRY CIC
Breake Code	PEAAB - 4 WHEEL ANTI-LOCK BRAKES	Power Antennac	* - [N/A]
Brake Code(Options)	* - [N/A]	Radio	AQ - E3 STR PREMIUM AM/FM STRO/CSTE
Calibration Code	318DR31A	Sound System	* - [N/A]
Color(Assort):	* - [N/A]	Stanga Treadon Axle	
Color(Title):	* - [N/A]	Tire Brand	AJ - MICHELIN
Delivery Type:	N	Tire Size	030SF - P215/70R15 WWW
Drivetrain Code	*	Traction Control	* - [N/A]
Frost Seats	* - [N/A]	Wheel Base	
Fuel Type:	* - [N/A]		

TIRE DOT INFORMATION:

LR	* - RR:	*
LR	* - RR:	*
LR	* - RR:	*
REAR:	*	

ESP INFORMATION; EMISSIONS INFORMATION:

ESP Code	* - Electronic Code:	C9 - C9
ESP Coverage(ABW)	* - Electronic Ctrl Type:	F
ESP Coverage(TWY)	* - Electronic Dens Shift:	JY
ESP Max Year:	* - Engine Family:	PPM4CVSDP3
ESP Signature Date:		

1234567890

Standard Claims List For Model Year 1993

VIN	FRT LNU	MKT DERIV	BODY CAB	VER SELBS	DRIVE TYPE	FLT CD	TRS CD	ENG CD	PROD DATE	WARR DATE	SELLING DEALER	SELL CNT	TIS	WCC CPSC_6	PREF BASE	SURF CCC	CD	DBST (Mile)
1LNLM81W9PY724232 CVB	CM	CPC	CVAB	CB	BA	COK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	8	SVII 066301	*	1102	*	N27 14 24228	
AWS Claim Key: 5228861 Trx Order: 884 Labor Hrs: 3.4																		
Mr Chk-Sub Cd: 12045-P Name: RAY PEARMAN LINCOLN MERCURY, INC																		Rep Date 20-SEP-1993 Doc # 019869
Prob Cause/Cmt: REPAIR BRAKE NOISE AND SHIMMY																		
1LNLM81W9PY724232 CVB	CM	CPC	CVAB	CB	BA	COK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	9	IP09 038304	*	18A16	*	N11 08 25245	
AWS Claim Key: 5228861 Trx Order: 8 Labor Hrs: 4.6																		
Mr Chk-Sub Cd: 12045-P Name: RAY PEARMAN LINCOLN MERCURY, INC																		Rep Date 23-DEC-1993 Doc # 033697
Prob Cause/Cmt: CL NOSE UNDER HOOD (PART IN)																		
1LNLM81W9PY724232 CVB	CM	CPC	CVAB	CB	BA	COK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	10	2B03 03000X	*	59715	*	N11 08 26546	
AWS Claim Key: 5228861 Trx Order: 887 Labor Hrs: 6.1																		
Mr Chk-Sub Cd: T2045-P Name: RAY PEARMAN LINCOLN MERCURY, INC																		Rep Date 11-JAN-1994 Doc # 034911
Prob Cause/Cmt: CL BUMMING ROLL ON DEC UNDER HOOD AREA (PART IN)																		
1LNLM81W9PY724232 CVB	CM	CPC	CVAB	CB	BA	COK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	10	6C01 026591	*	5413208	*	T13 01 26546	
AWS Claim Key: 5228861 Trx Order: 884 Labor Hrs: 1.5																		
Mr Chk-Sub Cd: 12045-P Name: RAY PEARMAN LINCOLN MERCURY, INC																		Rep Date 11-JAN-1994 Doc # 034911
Prob Cause/Cmt: CL CARPET HAS BAD SPOTS (PART IN)																		
1LNLM81W9PY724232 CVB	CM	CPC	CVAB	CB	BA	COK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	10	6A02 010501	*	5413208	*	T33 01 26884	
AWS Claim Key: 5228861 Trx Order: 884 Labor Hrs: 3																		
Mr Chk-Sub Cd: T2045-P Name: RAY PEARMAN LINCOLN MERCURY, INC																		Rep Date 20-JAN-1994 Doc # 034923
Prob Cause/Cmt: CL PAT SKID PLATE TRIM BROKEN (PART IN)																		
1LNLM81W9PY724232 CVB	CM	CPC	CVAB	CB	BA	COK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	17	6P17 NANANA	*	763160	*	R21 08 41919	

AWS Claim Key:	11133914	Tire Order:	894	Latent Date:	3		
Inv Cr-Shp Cde:	12045-A	Name:	RAY PEARMAN LINCOLN MERCURY, INC.	Pn:	256-5367451	St: AL	City Cd:
CostComments: NOISE AT SIDE, HIGH SPEED SIDE ROV							
TechComments: SEAL TOP WINDSHIELD SEALER, SKIP SEAL TOP WINDSHIELD SEALER, SEPR							
AWS Claim Key:	11133912	Tire Order:	894	Latent Date:	4		
Inv Cr-Shp Cde:	12045-A	Name:	RAY PEARMAN LINCOLN MERCURY, INC.	Pn:	256-5367451	St: AL	City Cd:
CostComments: WASHER NOSEY, & WASHERS BREAKING							
TechComments: REPL. WIPER MOTOR, WIPER MOTOR - WINDSHIELD (17306)							
AWS Claim Key:	11133911	Tire Order:	894	Latent Date:	5		
Inv Cr-Shp Cde:	12045-A	Name:	RAY PEARMAN LINCOLN MERCURY, INC.	Pn:	256-5367451	St: AL	City Cd:
CostComments: LUG NUT ON LEFT REAR BROKEN							
TechComments: REPLACED STUD ON AXLE, STUD ON AXLE REPLACED STUD ON AXLE							
AWS Claim Key:	11133910	Tire Order:	894	Latent Date:	27		
Inv Cr-Shp Cde:	12045-A	Name:	RAY PEARMAN LINCOLN MERCURY, INC.	Pn:	256-5367451	St: AL	City Cd:
CostComments: FULL TO LEFT WHEN BRAKING & PAD WEAR MORE ON LEFT							
TechComments: OVERHAUL CALIPERS, REPL. PRT BRKE OVERHAUL CALIPERS, REPL. PRT BRAKE PADS, MACH PRT ROTORS							
AWS Claim Key:	11133912	Tire Order:	893	Latent Date:	3		
Inv Cr-Shp Cde:	12045-A	Name:	RAY PEARMAN LINCOLN MERCURY, INC.	Pn:	256-5367451	St: AL	City Cd:
CostComments: OK WINDSHIELD WASHERS INOP HEATTI							
TechComments: REPL. WIPER SWITCH, REPL. WIPER SWITCH							
AWS Claim Key:	11133911	Tire Order:	893	Latent Date:	8		
Inv Cr-Shp Cde:	12045-A	Name:	RAY PEARMAN LINCOLN MERCURY, INC.	Pn:	256-5367451	St: AL	City Cd:
CostComments: NOISE AT HWY. SPEED							

Tech Comment:	SEAL TOP & SIDES OF WINDSHIELD SEAL, TOP & SIDES OF WINDSHIELD																				
IUNLM81W9PY724232 CVB	CM	CPC	CAB	CB	BA	CDK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	19	7E13	120303	* 19864 *	CS5 42 45457					
AWS Claim Key:	1175967	Tire Order:	884	Labor Hrs:	1																
Mr. CH-Sub Cds:																					
Mr. CH-Sub Cds:	12045*	Name:	RAY PEARMAN LINCOLN MERCURY, INC	Pn:	256-4367451	St: AL	Ctry Cd:			USA Reg Cd:	NA	Beg Date: 29-SEP-1994			End:	Dec #406612					
Tech Comment:																					
Tech Comment:																					
IUNLM81W9PY724232 CVB	CM	CPC	CAB	CB	BA	CDK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	21	5A01	030204	5PA2 4208 D	N81 08 49157					
AWS Claim Key:	1182215	Tire Order:	884	Labor Hrs:	3.4																
Mr. CH-Sub Cds:	12045*	Name:	RAY PEARMAN LINCOLN MERCURY, INC	Pn:	256-4367451	St: AL	Ctry Cd:			USA Reg Cd:	NA	Beg Date: 01-DEC-1994			End:	Dec #401152251					
Tech Comment:																					
Tech Comment:																					
IUNLM81W9PY724232 CVB	CM	CPC	CAB	CB	BA	CDK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	21	5W01	060808	FIVY 1C006 A	N17 14 49157					
AWS Claim Key:	1182215	Tire Order:	884	Labor Hrs:	3.7																
Mr. CH-Sub Cds:	12045*	Name:	RAY PEARMAN LINCOLN MERCURY, INC	Pn:	256-4367451	St: AL	Ctry Cd:			USA Reg Cd:	NA	Beg Date: 01-DEC-1994			End:	Dec #401152252					
Tech Comment:																					
Tech Comment:																					
IUNLM81W9PY724232 CVB	CM	CPC	CAB	CB	BA	CDK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	28	3A08	070100	PSZZ 7982	ARM P99 30 84877					
AWS Claim Key:	1184061	Tire Order:	901	Labor Hrs:	4.5																
Mr. CH-Sub Cds:	12045*	Name:	RAY PEARMAN LINCOLN MERCURY, INC	Pn:	256-4367451	St: AL	Ctry Cd:			USA Reg Cd:	NA	Beg Date: 05-JUL-1995			End:	Dec #402451001					
Tech Comment:																					
Tech Comment:																					
ELUNLAE1W9PY724232 CVB	CM	CPC	CAB	CB	BA	CDK	CVN	12-MAR-1993	30-MAR-1993	325731	USA	33	*	*	*	*	*	*	*	*	74664
AWS Claim Key:	1181740	Tire Order:	938H4	Labor Hrs:	3																
Mr. CH-Sub Cds:	12045*	Name:	RAY PEARMAN LINCOLN MERCURY, INC	Pn:	256-4367451	St: AL	Ctry Cd:			USA Reg Cd:	NA	Beg Date: 05-JUL-1995			End:	Dec #402451000					
Tech Comment:																					
Tech Comment:																					

Claim Detail Report

Model Year = 1993; Claim Key = 8228801

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 029869

Repair Date: 20-SEP-1993

Distance: 24228

TIS: 6

Dealer Information

Dealer Name: RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cust. Concern Code: N27 - VIBRATION OR SHUDDER WHILE BRAKING

Condition Code: 14 - SURFACE ROUGH/UNEVEN

Technician Comment: REPAIR BRAKE NOISE AND SHIMMY

Customer Comment:

Labor Op. Code

Labor Op. Description

1102DT DISC BRAKE ROTOR - FRONT MACHINE

2026AT DISC BRAKE ROTOR - REAR MACHINE

Causal Full Part Number	Part	Part	
Flag	FREE BASE SUFF.	Description	CPSC Quantity
Y	*	1102 * HUB & ROTOR ASY FRONT	060301

Claim Detail Report

Model Year = 1993; Claim Key = 8228802

Vehicle Information

Model Year: 1993	Claim Information
Market Derived: C/M - MERCURY DIVISION DERIVATIVE	Document Number: 033697
Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE	Repair Date: 23-DEC-1993
Version/Series: C/AB-BASE VERSION - CAR	Distance: 25245
Drive Type: C/B-2 WHL L/H REAR DRIVE	TIS: 9
Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]	
Warranty Start Date: 30-MAR-1993	
Production Date: 12-MAR-1993	
VIN: 1LNLM81W9PY724232	

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I
Dealer Code: 12045 - *
Address: 2501 BOB WALLACE
City: HUNTSVILLE
State: AL Zip Code: 35805
Country: USA Region Code: NA
Phone: (205)745-7451

Cust. Concern Code: N11 - UNUSUAL ENGINE NOISE AT IDLE

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

Technician Comment: CK NOISE UNDER HOOD (PART IN)

Customer Comment:

Labor Op Code	Labor Op Description
8616A	FAN DRIVE CLUTCH REPLACE

Comal Full Part Number	Part	Part			
Flag	FREE BASE SUEF	Description	CPSC	Quantity	
Y	*	8A616	*	CLUTCH ASY-FAN A/C 030306	0
N	YB	478	*	NANANA	1

Claim Detail Report

Model Year = 1993; Claim Key = 8228803

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 034311

Repair Date: 11-JAN-1994

Distance: 26546

TIS: 10

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cust. Concern Code: N11 - UNUSUAL ENGINE NOISE AT IDLE

Condition Code: 08 - OTHER/UNKNOWN(No appropriate cond. code)

Technician Comment: CK HUMMING NOISE ON DEC/UNDER HOOD AREA (SEE KOV)

Customer Comment:

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Labor Op. Code **Labor Op. Description**

12650D	EBC - (QUICK TEST) DIAGNOSIS
12650D3	VALVE ASSEMBLY (IDLE AIR CONTROL) - IAC REPLACE
12650DX1	EXTRA TIME TO REPEAT FINAL QUICK TEST

Causal Full Part Number **Part** **Part**

Flag	PREF	BASE	SURF	Description	CPSC	Quantity
Y	*	9F715	*	VALVE-AIR BYPASS	0300XX	0
N	F1VY	5413000	ARA	CARPET/MAT,FRT FLR R	010501	1
N	F2AZ	9F715	A	VALVE-AIR BYPASS	030001	1

Claim Detail Report

Model Year = 1993; Claim Key = 8228804

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 034311

Repair Date: 11-JAN-1994

Distance: 26546

TIS: 10

Dealer Information

Dealer Name RAY PHARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (205)745-7451

Cust. Concern Code: T13 - CARPET/FLOOR COVERING - FADED, DISCOLORED

Condition Code: 81 - TARNISHED/FADED

Technician Comment: CK CARPET HAS BAD SPOTS (PART IN)

Customer Comment:

Labor Op Code Labor Op Description

13000A MAT OR FLOOR CARPETS REPLACE

Current Part Number	Part	Part	
Flag	FREE BASE SURF	Description	CPSC Quantity
Y	* 5413000	CARPET/MAT,FRT FLRR	010501

8228804

<https://web.svcwesupp.ford.com/cgi-bin/jls/dlr-detailclm20.cgi?svr=eccdb2x&modelyr=1993&clmkey=8228804>

8/13/2003

Claim Detail Report

Model Year = 1993; Claim Key = 8228805

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Serial: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 034623

Repair Date: 20-JAN-1994

Distance: 26886

TIS: 10

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cust. Concern Code: T53 - INTERIOR MOLDINGS-LOOSE, POOR FIT, WARPED, WRINKLED

Condition Code: 01 - BROKEN/CRACKED

Technician Comment: CK FRT SKID PLATE TRIM BROKEN (PART IN)

Customer Comment:

Labor Op Code Labor Op Description

13208A DOOR SCUFF PLATE REPLACE

Category	Full Part Number	Part	Part
Flag	FREE BASE SUPP.	Description	CPS/C Quantity
Y	* 5413208	SCUFF PLATE-DOOR R 010501	0
N	FOVY 5413208	K SCUFF PLATE-DOOR R 010507	2

Claim Detail Report

Model Year = 1993; Claim Key = 11133814

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 066681

Repair Date: 10-AUG-1994

Distance: 41919

TIS: 17

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (205)743-7451

Cost Center Code: R21 - WIND NOISE AROUND WINDSHIELD

Condition Code: 68 - SEALER MISSING/SKIPPED

Technician Comment: SEAL TOP WINDSHIELD-SEALER SKIP SEAL TOP WINDSHIELD-SEALER SKIP

Customer Comment: NOISE RT. SIDE, HWY SPEED SEE KOV

Labor Op Code Labor Op Description

M

Current Part Number	Part	Part	
Flag	Description	CESC	Quantity
Y	* 703100 * WINDSHIELD GLASS NANANA	0	

Claim Detail Report

Model Year = 1993; Claim Key = 11133813

Vehicle Information

Model Year: 1993
Market Derived: C/M - MERCURY DIVISION DERIVATIVE
Body/Cab Type: C/F/C - 4 DOOR SEDAN-6 LITE
Version/Series: C/AB-BASE VERSION - CAR
Drive Type: C/B-2 WHL L/H REAR DRIVE
Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]
Warranty Start Date: 30-MAR-1993
Production Date: 12-MAR-1993
VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 006681
Repair Date: 10-AUG-1994
Distance: 41919
TIS: 17

Dealer Information

Dealer Name: RAY PEARMAN LINCOLN MERCURY, I
Dealer Code: 12045 - *
Address: 2501 BOB WALLACE
City: HUNTSVILLE
State: AL **Zip Code:** 35805
Country: USA **Region Code:** NA
Phone: (256)745-7451

Cust. Concern Code: W10 - OTHER WIPER/WASHER TROUBLES (INCLUDING LEAKS)

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

Technician Comment: REPL. WIPER MOTOR WIPER MOTOR - WINDSHIELD (17508)

Customer Comment: WIPERS NOISY, & WASHERS ERRATIC

Labor Op Code

Labor Op Description

17508A WIPER MOTOR-WINDSHIELD REPLACE

Causal Fall Part Number	Part	Part			
Flag	FREE BASE SURF	Description	CPSIC	Quantity	
Y	*	17508	*	WINDSHIELD WIPER MOT 011603	0
N	WM	436	*	NANANA	1

2000-02-01 00:00:00

Claim Detail Report

Model Year = 1993; Claim Key = 11133816

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 006685

Repair Date: 10-AUG-1994

Distance: 41919

TIS: 17

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cust. Concern Code: C50 - OTHER STEERING/HANDLING AND RIDE TROUBLES

Condition Code: 01 - BROKEN/CRACKED

Technician Comment: REPLACED STUD ON AXLE-BROKE REPLACED STUD ON AXLE

Customer Comment: LUG NUT ON LEFT REAR BROKEN

 Labor Op Code Labor Op Description

 1107A BOLT(S) - FRONT HUB REPLACE

Category	Part Number	Part	Part
Flag	PREF BASE SUPP Description	CPSC	Quantity
Y	* 1107 *	HUB BOLT 06XXXX	0
N	POVY 1107 A	HUB BOLT NANANA	1

Claim Detail Report

Model Year = 1993; Claim Key = 11133815

Vehicle Information

Model Year: 1993
Market Derived: C/M - MERCURY DIVISION DERIVATIVE
Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE
Version/Series: C/AB-BASE VERSION - CAR
Drive Type: C/B-2 WHL L/H REAR DRIVE
Vehicle Line: C/VB-TOWN CAR (FN36/PN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 006685
Repair Date: 10-AUG-1994
Distance: 41919
TIS: 17

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I
Dealer Code: 12045 - *
Address: 2501 BOB WALLACE
City: HUNTSVILLE
State: AL Zip Code: 35803
Country: USA Region Code: NA
Phone: (256)745-7451

Cust. Concern Code: H25 - CONSTANT PULL TO LEFT

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: OVERHAUL CALIPERS,REPL. FRT BRKE OVERHAUL CALIPERS,REPL. FRT BRAKE PADS,MACH FRT ROTORS

Customer Comment: PULL TO LEFT WHEN BRAKING & PADS WORN MORE ON LEFT

Labor Op CodeLabor Op Description

2001AF BRAKE SHOES / PAD ASSEMBLIES - HYDRAULIC REMOVE AND INSTALL OR REPLACE
2001A9FT CALIPER ASSEMBLY - DISC BRAKE OVERHAUL
2001A11T DISC BRAKE ROTOR - FRONT MACHINE

Causal	Full Part Number	Part	Part
Flag	PREF BASE SUFF	Description	CPS/C Quantity
Y	*	2221 *	KIT-FRT BRAKE CYL RE 060302 0
N	D9AZ	2221 A	KIT-FRT BRAKE CYL RE 060302 1
N	C6AZ	19542 AA	BRAKE FLUID 190103 1
N	F4AZ	2001 A	KIT-BRAKE SHOE LININ 060302 1

65001 8-2003-00000

Claim Detail Report

Model Year = 1993; Claim Key = 11133817

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 006708

Repair Date: 10-AUG-1994

Distance: 41919

TIS: 17

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cost Concern Code: W05 - FRONT WIPERS TROUBLES

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: REPL. WIPER SWITCH REPL. WIPER SWITCH

Customer Comment: CK WINDSHIELD WASHERS INOP BRAITT

Labor Op Code

Labor Op Description

13300D STEERING COLUMN/DASH SWITCH ASSEMBLIES DIAGNOSIS

13300D4 SWITCH-MULTI-FUNCTION/WINDSHIELD WIPER REPLACE

Current Part Number	Part	Part	
File #	Description	CRSC	Quantity
PREB BASE SUFF	SWITCH T/S& W/W	110501	0
Y * 13K359 *			
N SW 2469 *	BRACKET BRAKE PEDAL INNER NANANA		1

Claim Detail Report

Model Year = 1993; Claim Key = 11133818

Vehicle Information

Model Year: 1993

Market Derived: CM - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/FC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 007670

Repair Date: 01-SEP-1994

Distance: 43992

TIS: 18

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cust. Concern Code: R21 - WIND NOISE AROUND WINDSHIELD

Condition Code: 68 - SEALER MISSING/SKIPPED

Technician Comment: SEAL TOP & SIDES OF WINDSHIELD SEAL TOP & SIDES OF WINDSHIELD

Customer Comment: NOISE AT HWY. SPEED

Labor Op Code Labor Op Description

B

Category	Full Part Number	Part	Part	
Flag	PREF BASE SUET	Description	CPSIC	Quantity
Y	* 703100 *	WINDSHIELD GLASS NANANA	0	

1002-020-0 1002

Claim Detail Report

Model Year = 1993; Claim Key = 11759497

Vehicle Information

Model Year: 1993

Market Derived: CM - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (PN36/PN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 008811

Repair Date: 29-SEP-1994

Distance: 45457

TIS: 19

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cost/Concern Code: C05 - A/C DOES NOT WORK

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: REPL BLOWER SPEED MOTOR CONTROLL REPL BLOWER SPEED MOTOR CONTROLL ER

Customer Comment: AC WONT CUT OFF

Labor Op Code

Labor Op Description

19624A BLOWER MOTOR SPEED CONTROLLER REPLACE

Control	Full Part Number	Part	Part
Flag	PREF BASE SUFF	Description	CPSC Quantity
Y	* 19E624 *	CONTROLLER BLUR SPD 120303	0
N	FOVY 19E624 B	CONTROLLER BLUR SPD 120303	1

Claim Detail Report

Model Year = 1993; Claim Key = 12427518

Vehicle Information

Model Year: 1993

Market Derived: CM - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/F/C - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Claim Information

Document Number: 01152251

Repair Date: 01-DEC-1994

Distance: 49157

TIS: 21

Cust. Concern Code: N11 - UNUSUAL ENGINE NOISE AT IDLE

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

Technician Comment: REPL. RING GEAR & PINION,PINION BREPL. RING GEAR & PINION,PINION BRGS,AXLE BRGS & SEAL & AXLES>

Customer Comment: CK FOR A NOISE FROM THE REAR END AREA>

FBI - MEMPHIS

<u>Labor Op Code</u>	<u>Labor Op Description</u>
----------------------	-----------------------------

4204A	DIFFERENTIAL CARRIER ASSEMBLY -IN CHASSIS- INTEGR DIAGNOSIS
4204A3	RING GEAR AND PINION SET -IN CHASSIS- INTEGRAL CA REPLACE
4204A7	PINION BEARINGS REPLACE
4204A10	BEARING - REAR WHEEL REPLACE

<u>Crane Full Part Number</u>	<u>Part</u>	<u>Part</u>		
<u>Flag</u>	<u>PFER BASE SUER</u>	<u>Description</u>	<u>CPSC</u>	<u>Quantity</u>
N	E8TZ 4676	C SEAL ASY-DRIVE PINIO	NANANA	1
Y	B7AZ 4209	D GEAR & PINION	030204	1
N	B7A 4621	A CONE & ROLLER-DR PIN	NANANA	1
N	C7AZ 4630	A PINION BEARING	NANANA	1
N	B7A 4616	A CUP-DRIVING PINION B	NANANA	1
N	C7AZ 4628	A CUP DRIVING PINION B	NANANA	1
N	F2AZ 4234	B SHAFT&BRG ASY REAR A	NANANA	2
N	E1AZ 1177	B SEAL ASY RR WHL BRG	NANANA	2
N	E5SZ 1225	A BEARING ASY REAR WHE	NANANA	2

STOKE 1-8220-2000

Claim Detail Report

Model Year = 1993; Claim Key = 12427519

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724332

Claim Information

Document Number: 01152252

Repair Date: 01-DEC-1994

Distance: 49157

TIS: 21

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)743-7451

Cust. Concern Code: N17 - BRAKES NOISY

Condition Code: 14 - SURFACE ROUGH/UNEVEN

Technician Comment: REPL. REAR BRAKE PADS,MACH 4 RTRS>REPL. REAR BRAKE PADS,MACH 4 RTRS>

Customer Comment: OK REAR BRAKES SKEM NOISY>

Labor Op CodeLabor Op Description

- | | |
|----------|--|
| 2001AB | BRAKE SHOES / PAD ASSEMBLIES - HYDRAULIC REMOVE AND INSTALL OR REPLACE |
| 2001A11T | DISC BRAKE ROTOR - FRONT MACHINE |
| 2001A12T | DISC BRAKE ROTOR - REAR MACHINE |

Current Full Part NumberPartPart

Flag	FREIGHT BASE SURF	Description	CPSC	Quantity
N	F2VY 2200 A	SHOE LINING REAR BRA	06XXXX	1
Y	F1VY 2C206 A	PLATE VACUUMPUMP MNTG	060900	0

S10001-000-00000

Claim Detail Report

Model Year = 1993; Claim Key = 16440661

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claim Information

Document Number: 02051051

Repair Date: 05-JUL-1993

Distance: 64877

TIS: 28

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cust. Concern Code: P59 - OTHER AUTOMATIC TRANSMISSION TROUBLES

Condition Code: 30 - CHAFED,EXCESSIVE WEAR,FRAYED

Technician Comment: REPL. TORQUE CONVERTER,FRT PUMP SREPL. TORQUE CONVERTER,FRT PUMP SEAL>

Customer Comment: CK FOR A CHATTER IN THE TRANS AROUND 45 MPH (P01)>

Labor Op Code	Labor Op Description
7000F	ELECTRONIC TRANSMISSION DIAGNOSIS DIAGNOSIS
7000A	TRANSMISSION ASSEMBLY REMOVE AND INSTALL OR REPLACE
7000A7	SEAL - FRONT PUMP, OR CONVERTER REPLACE

Consel	Full Part Number	Part	Part	
Flag	PREF BASE SURF	Description	CPSC	Quantity
Y	F52Z-7902-ARM	CONVERTER ASY	070100	1
N	F2VY-7A248-A	OIL SEAL FRT OIL PUM	NANANA	1
N	F2VY7 A098A *		NANANA	1
N	XT 2	QDX MOTORCRAFT BATTERY	NANANA	12

65001 9-2002-02003

Claim Detail Report

Model Year = 1993; Claim Key = 18335250

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

Body/Cab Type: C/PC - 4 DOOR SEDAN-6 LITE

Version/Series: C/AB-BASE VERSION - CAR

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

Vehicle Line: C/VB-TOWN CAR (FN36/FN116) [91-97]

Warranty Start Date: 30-MAR-1993

Production Date: 12-MAR-1993

VIN: 1LNLM81W9PY724232

Claims Information

Document Number: 02789250

Repair Date: 30-NOV-1995

Distance: 74664

TIS: 33

Dealer Information

Dealer Name RAY PEARMAN LINCOLN MERCURY, I

Dealer Code: 12045 - *

Address: 2501 BOB WALLACE

City: HUNTSVILLE

State: AL Zip Code: 35805

Country: USA Region Code: NA

Phone: (256)745-7451

Cust. Concern Code: * -

Condition Code: * - [N/A]

Technician Comment: INSPECT OK INSPECT OK

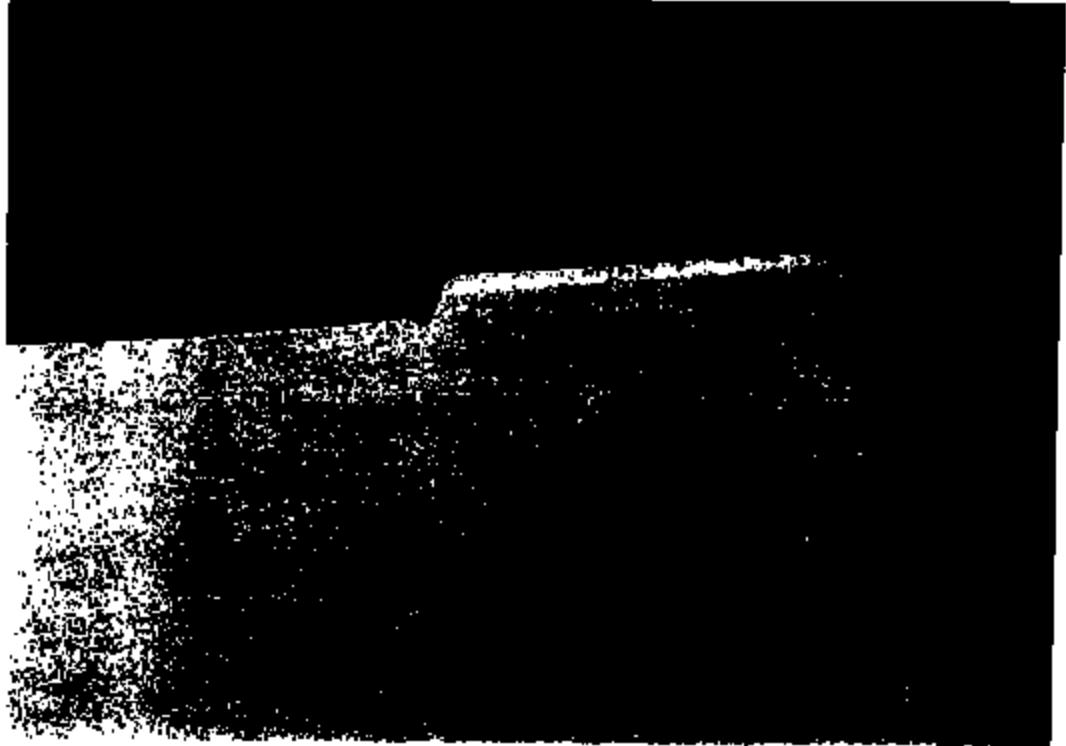
Customer Comment: PERFORM 95B64

Labor Op Code Labor Op Description

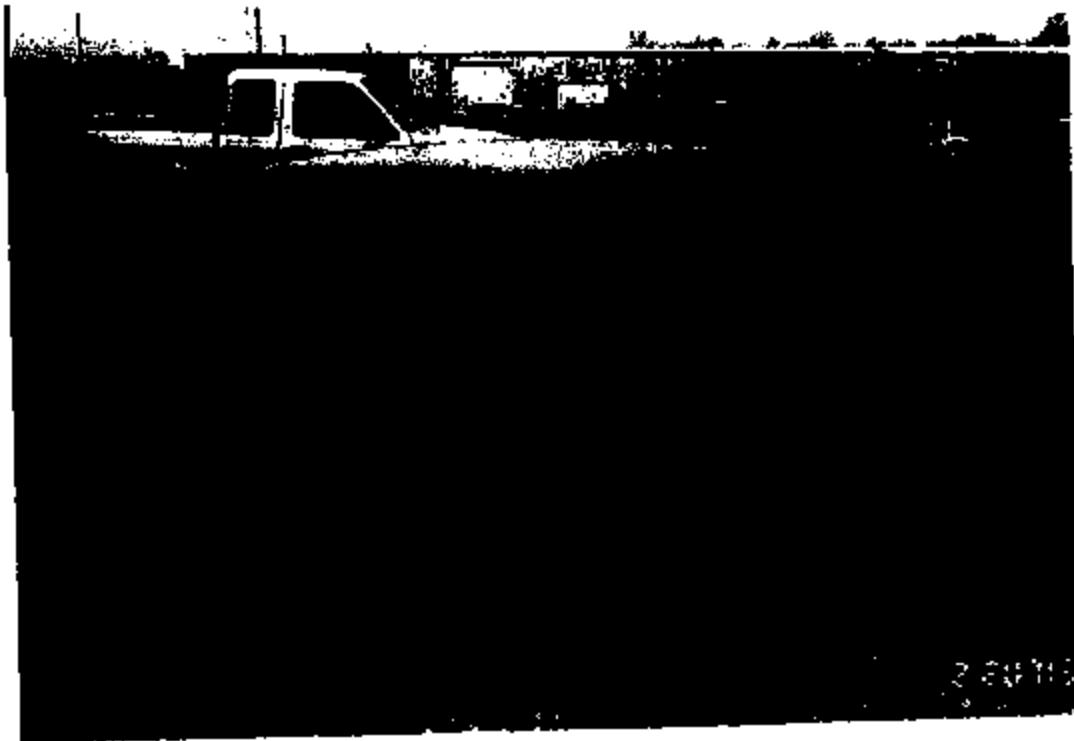
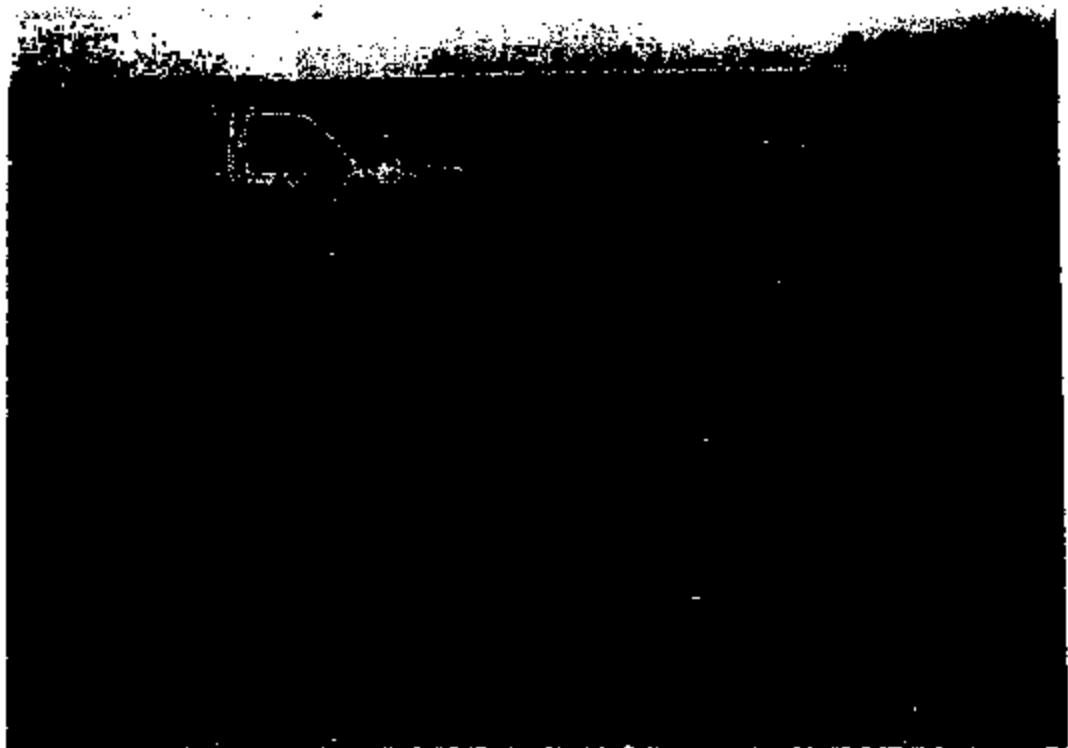
B64A REPLACE

Causal Part Part Number: Part Part
Flag: PREP BASE SURF Description: CPSC Quantity:

22001-0-000-000

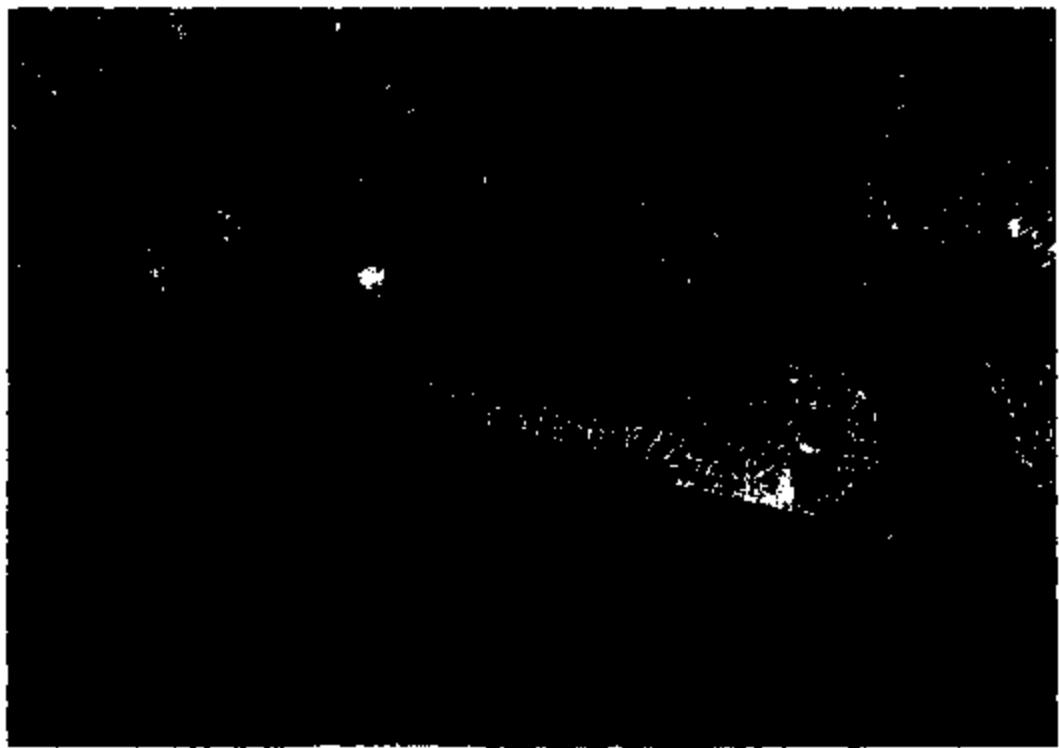


E902-025-B 10023



280105

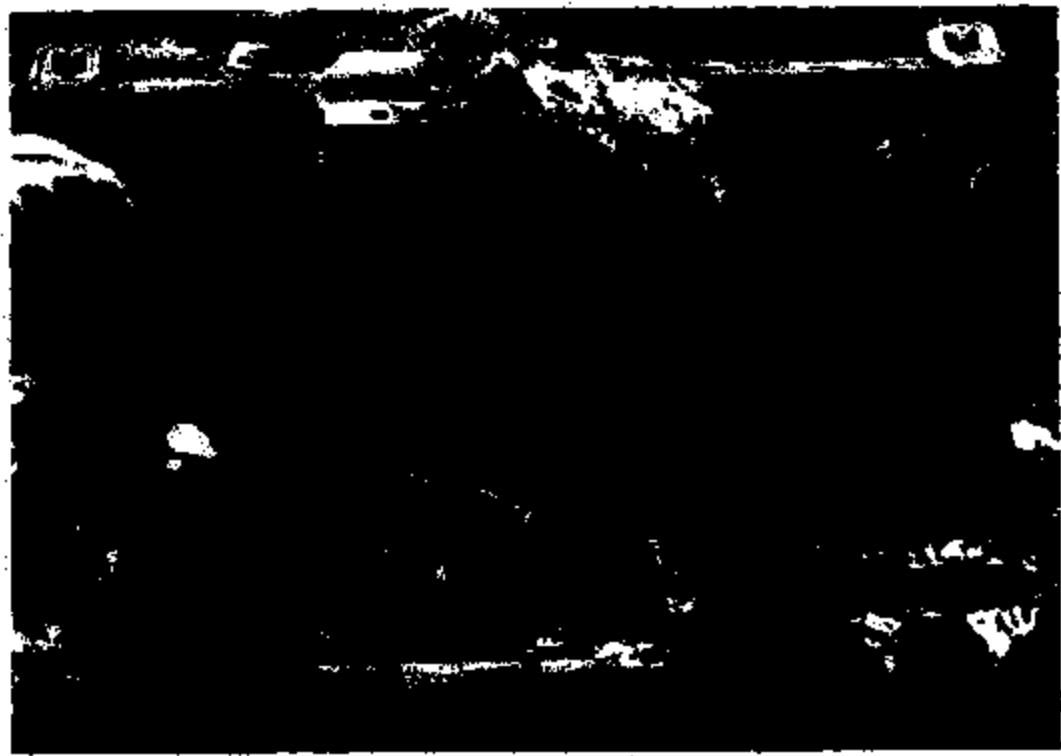
2002-525-B 1002



5982-825-B 10625



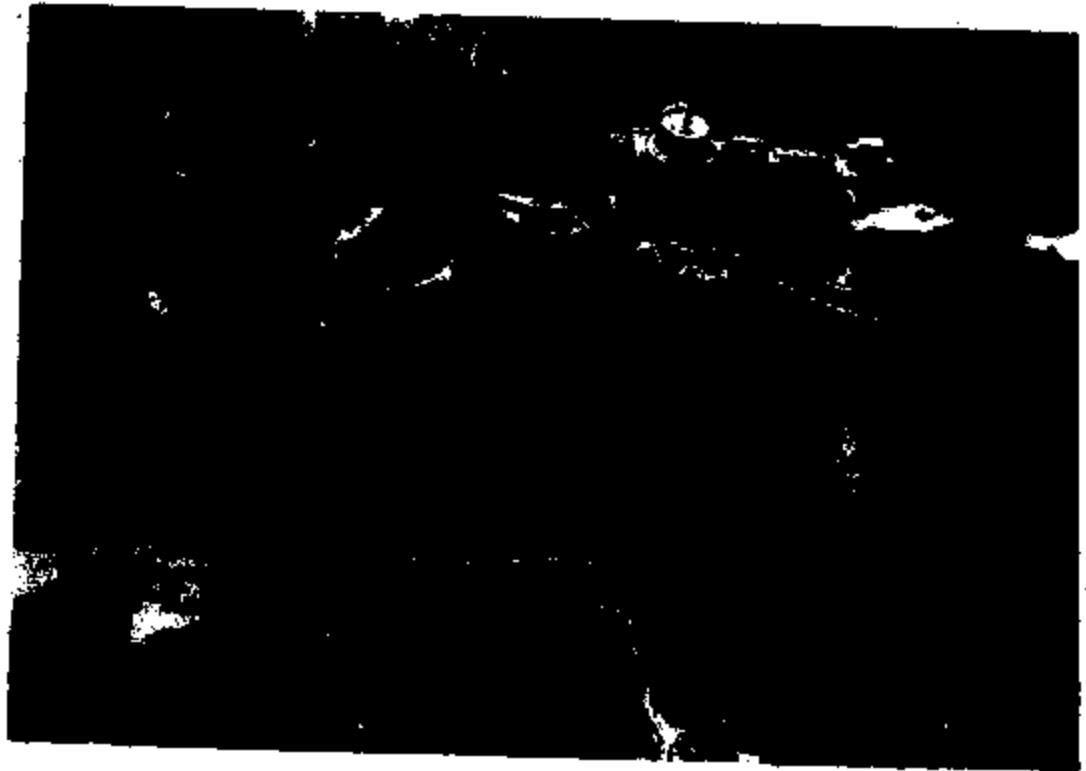
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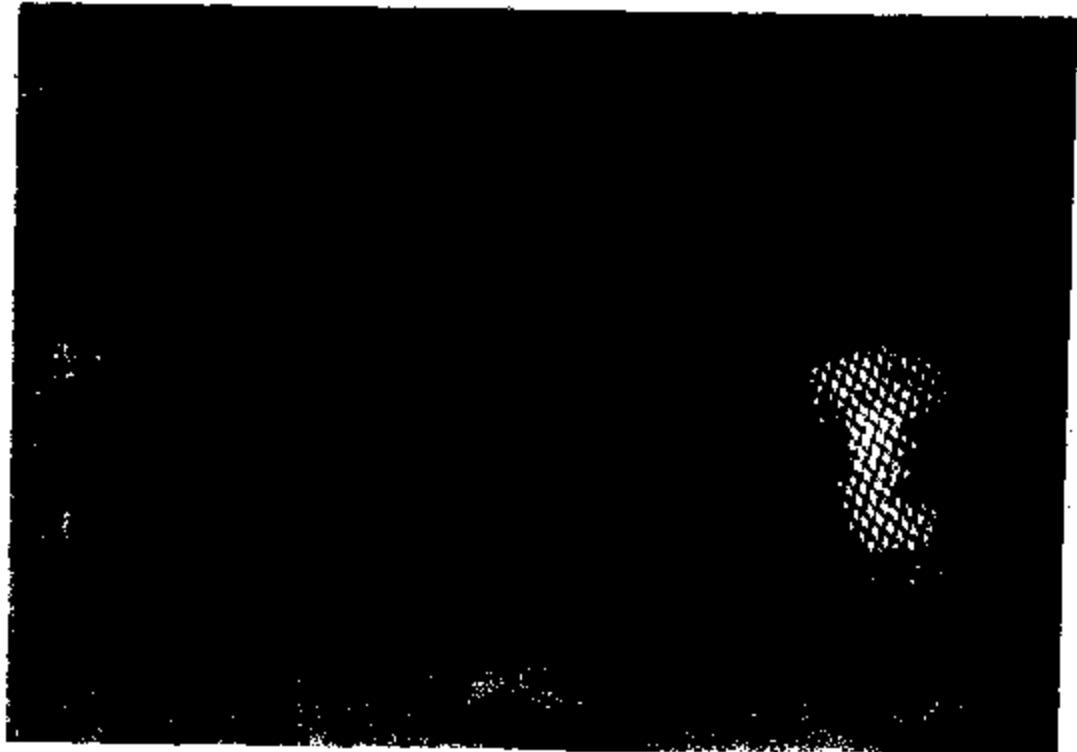
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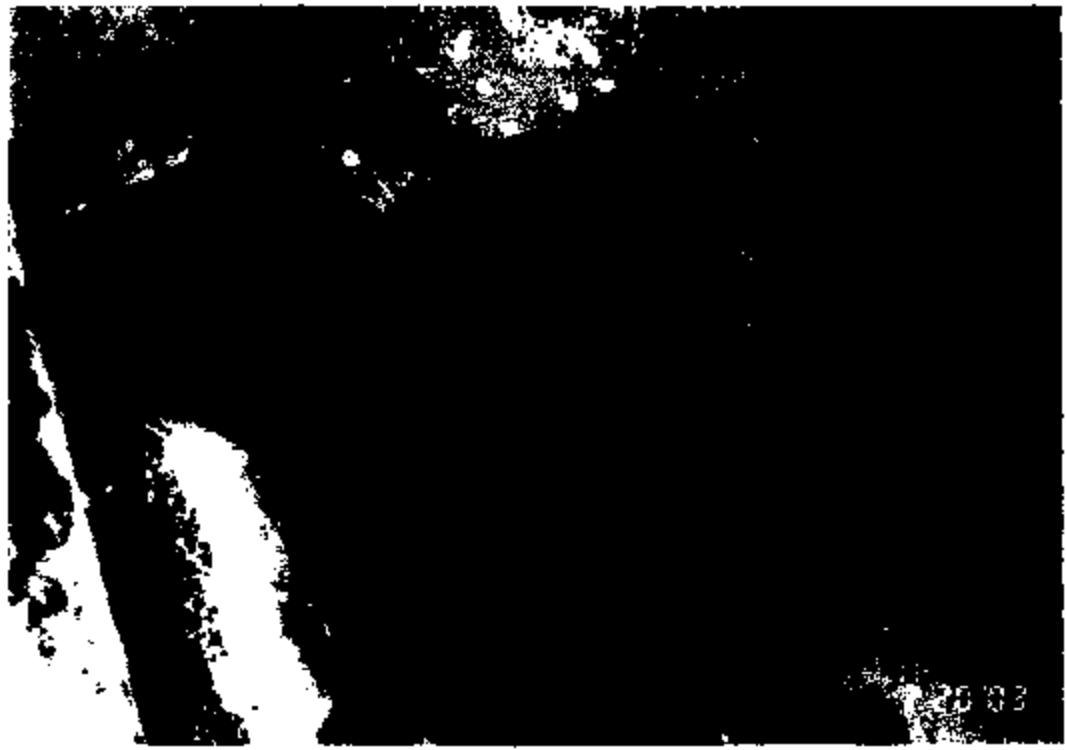
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5002-020-2 10029



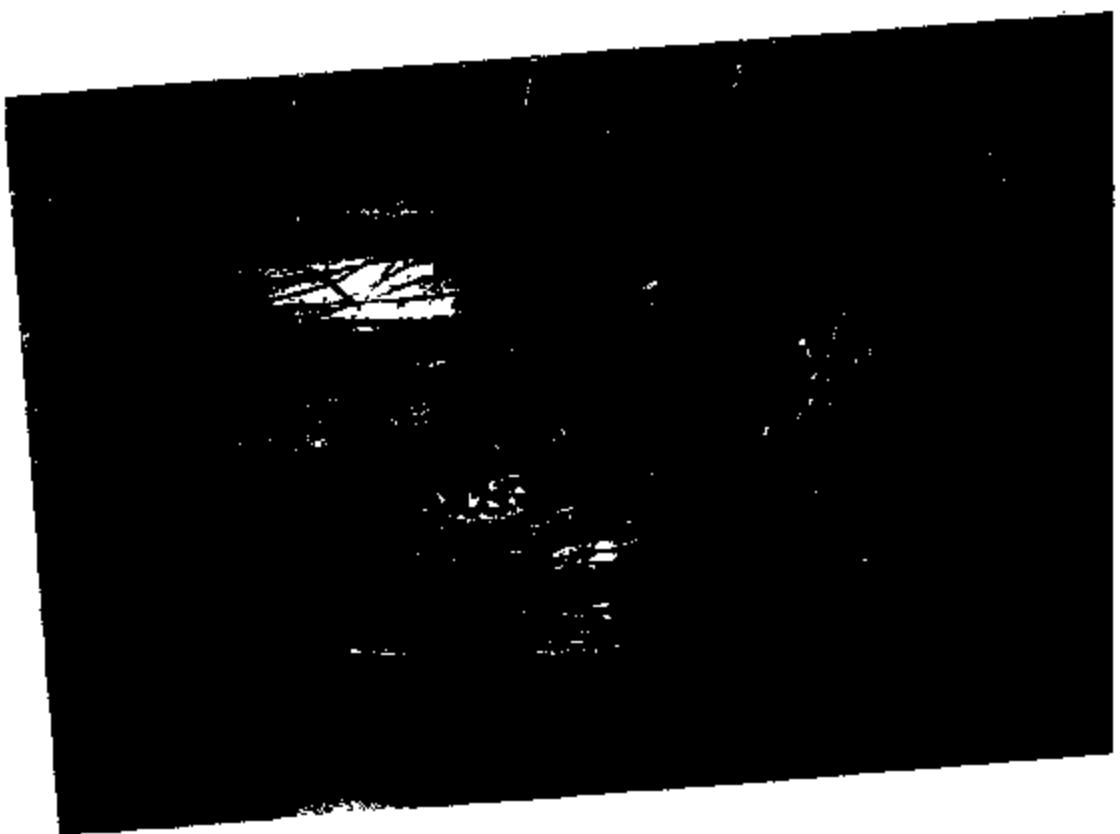
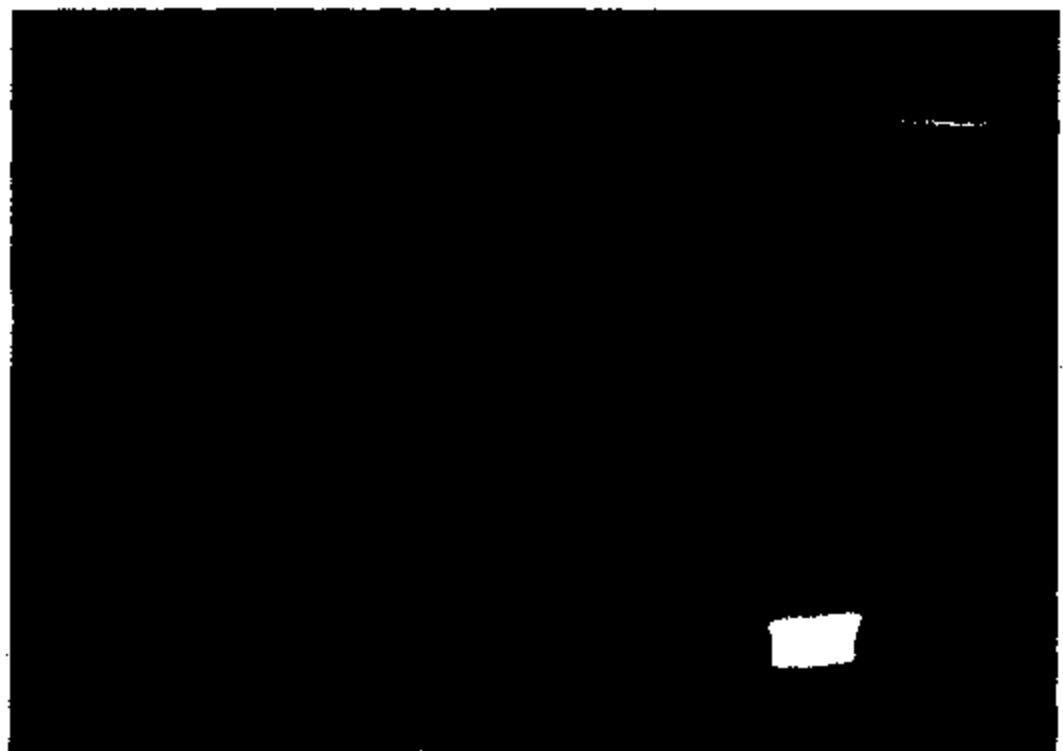
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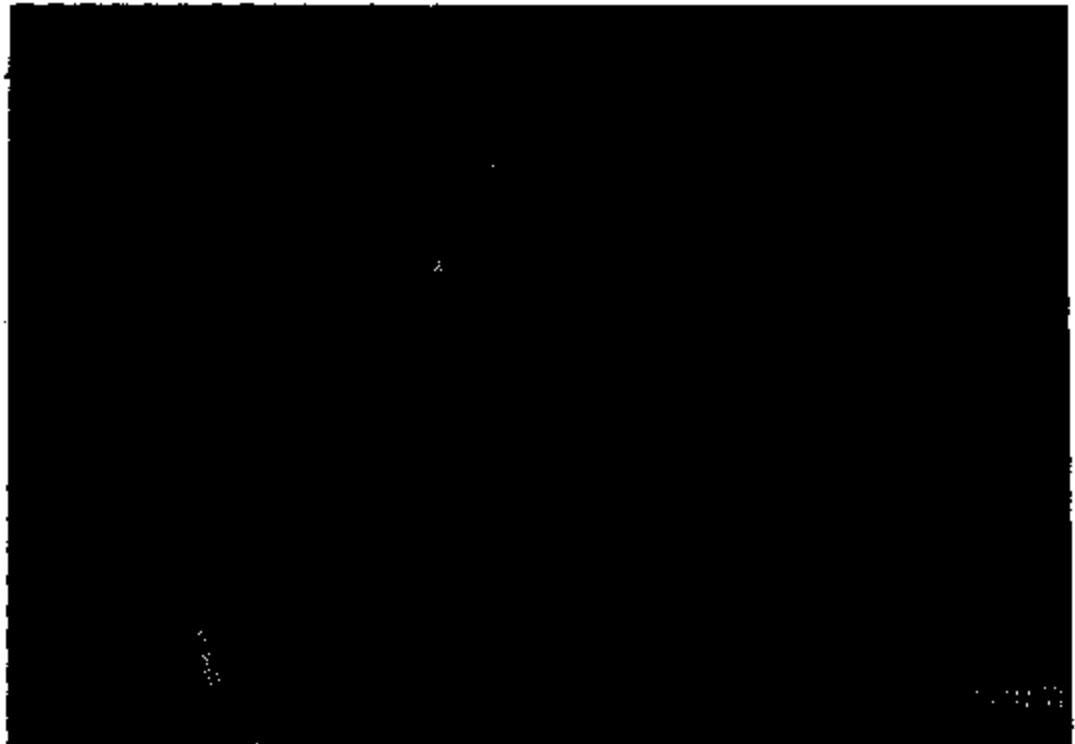
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5002-025-6 10012



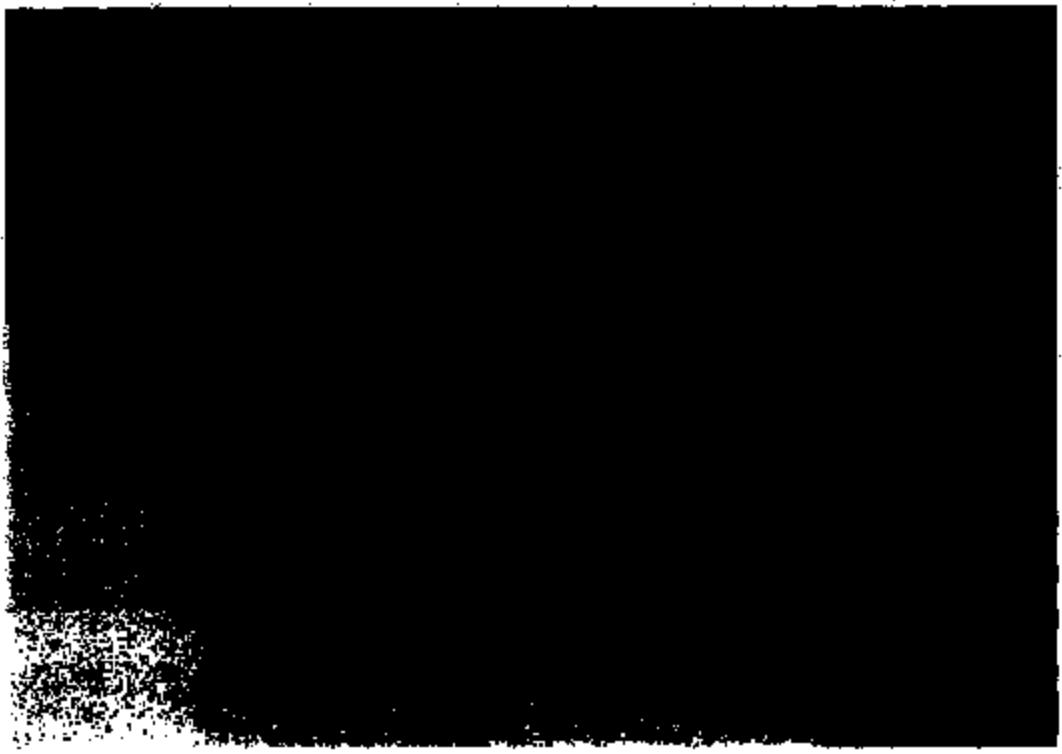
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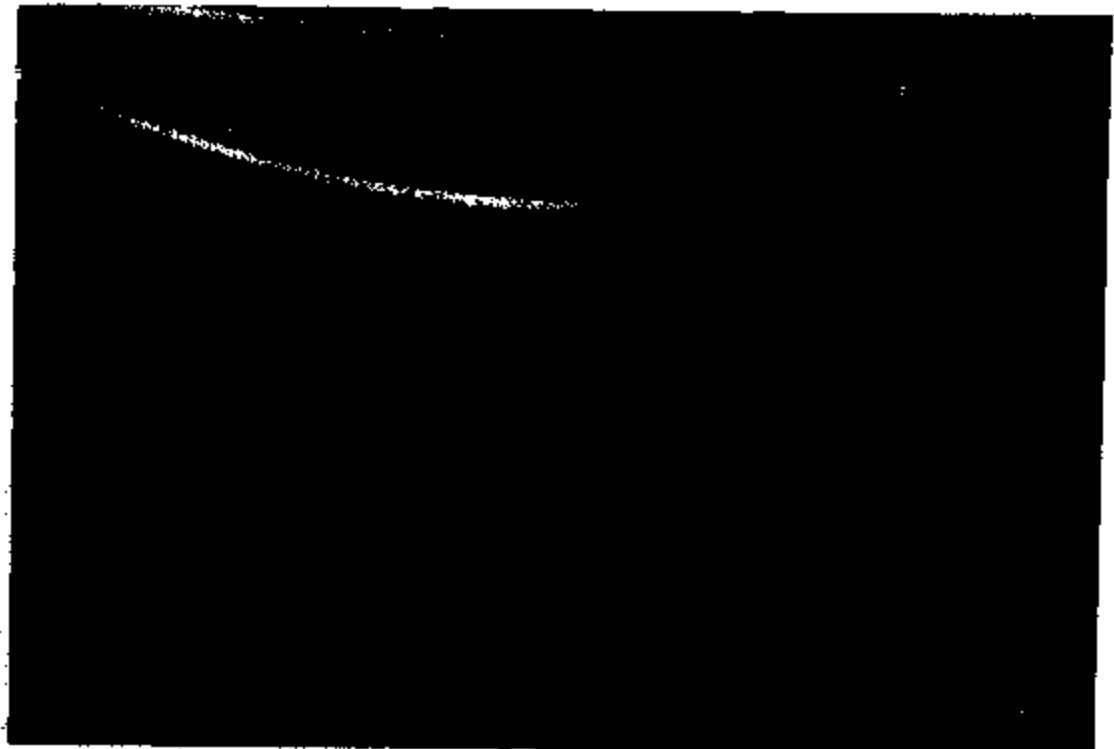
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2002-025-0



2002-025-0 10035



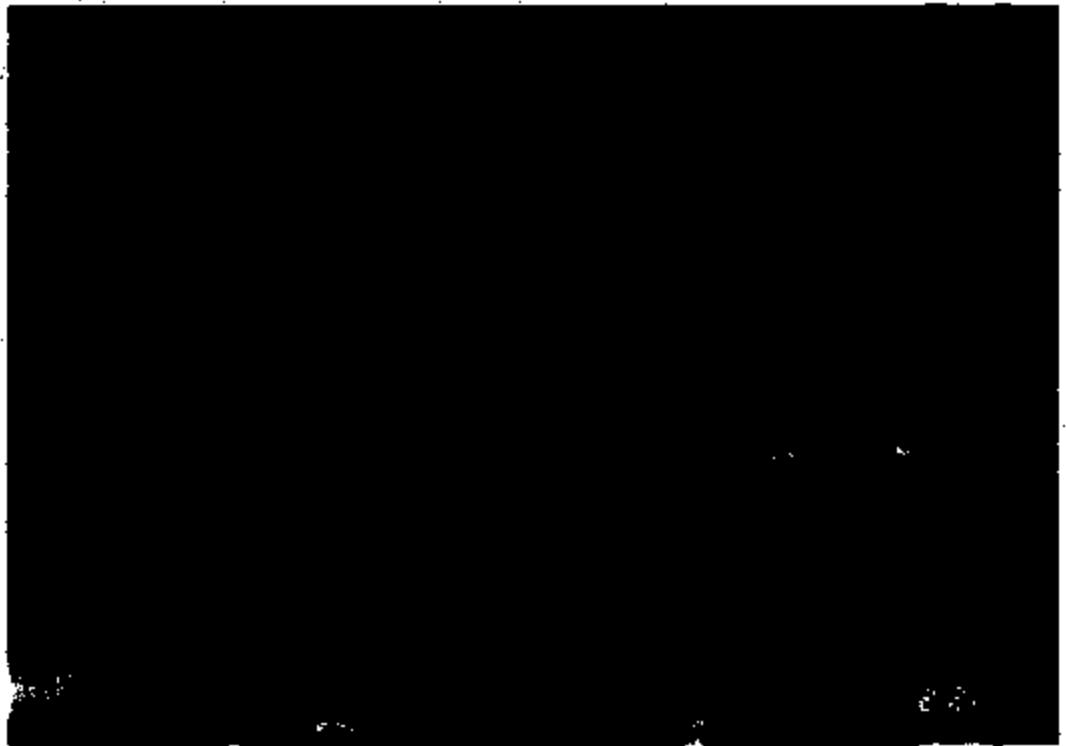
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0002-025-5 10037



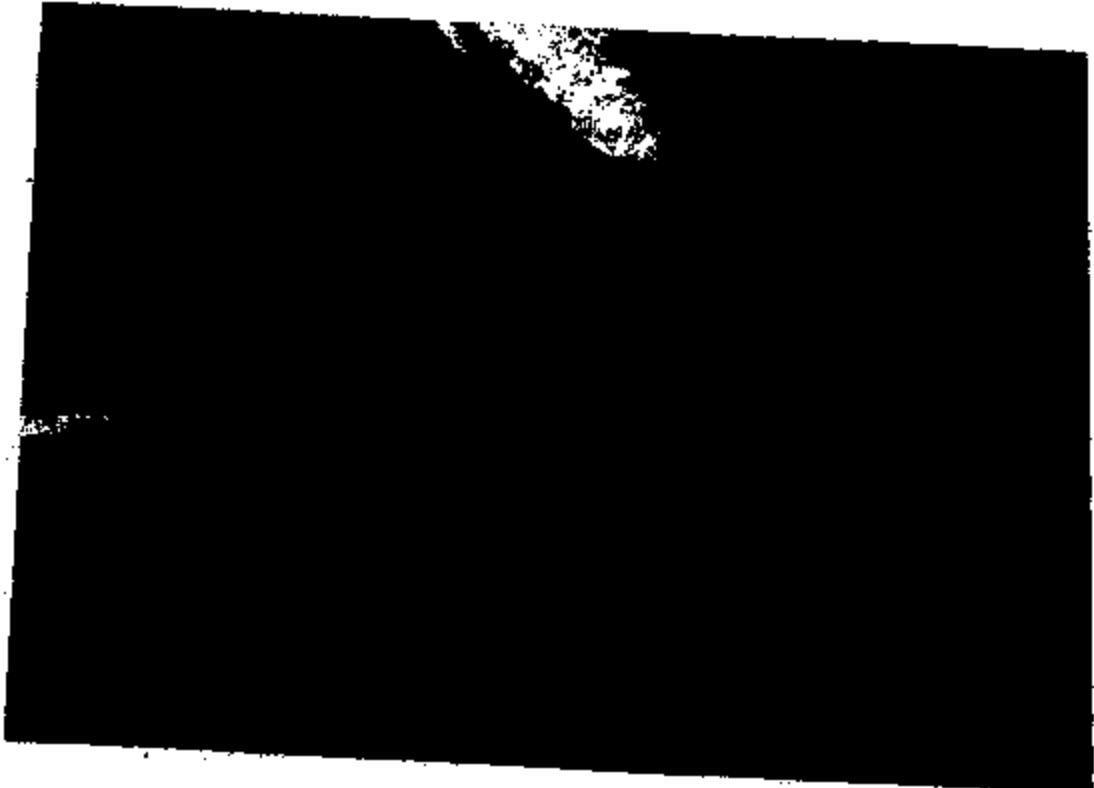
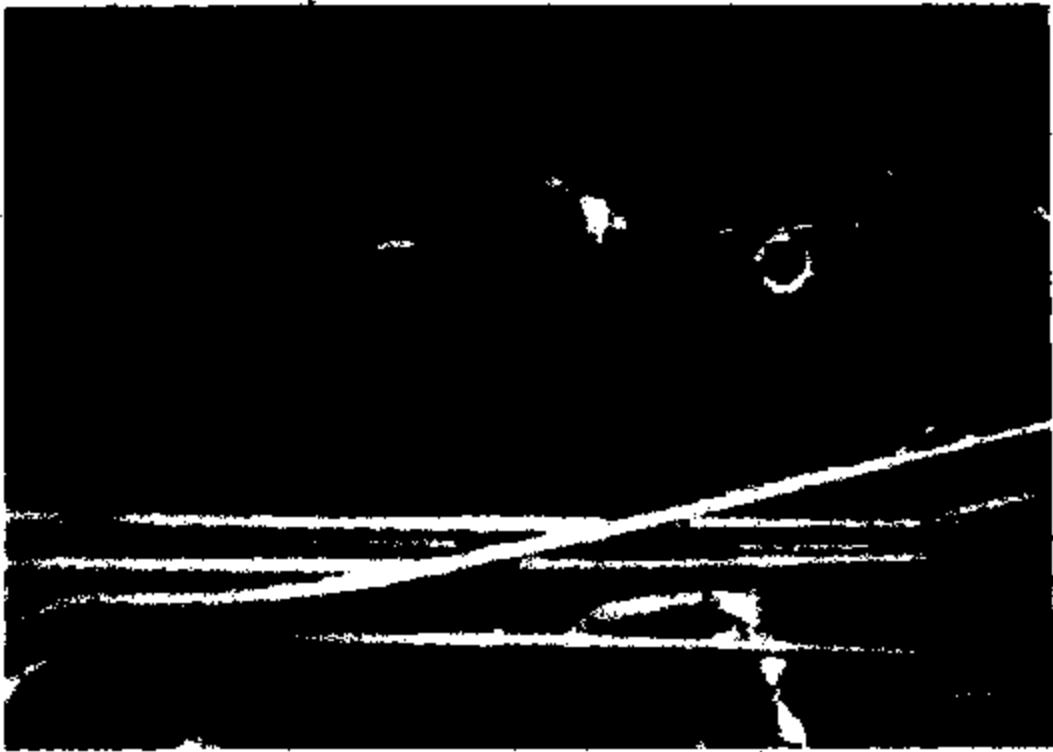
ENR2-025-B 16638



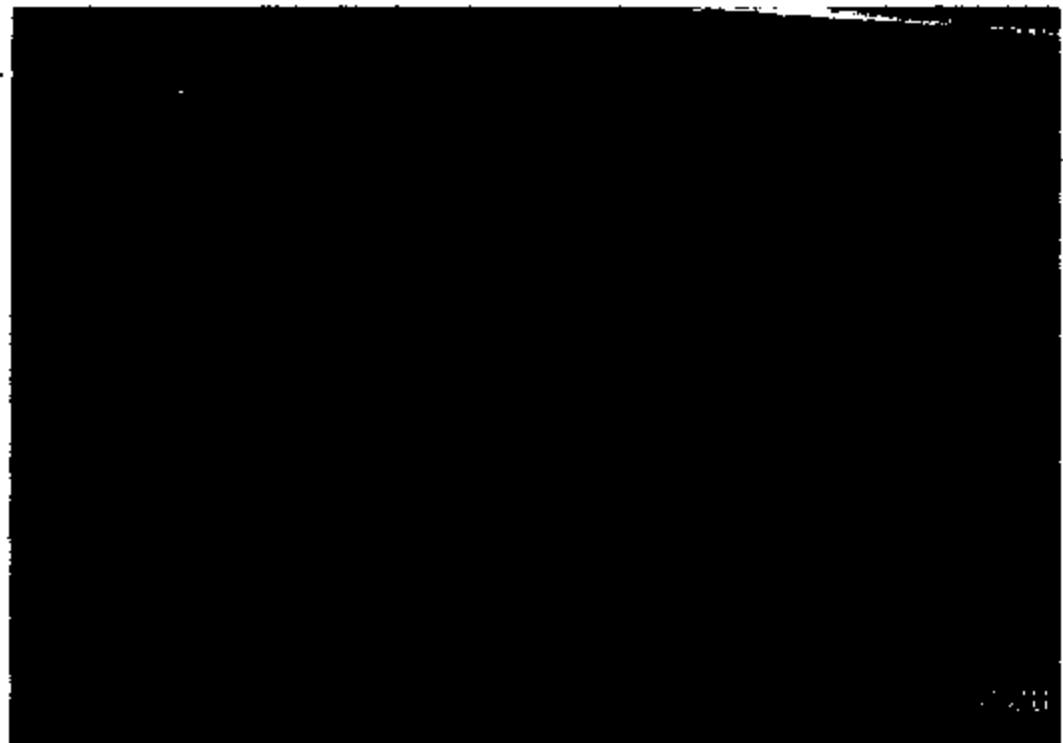
2002-025-5 10539



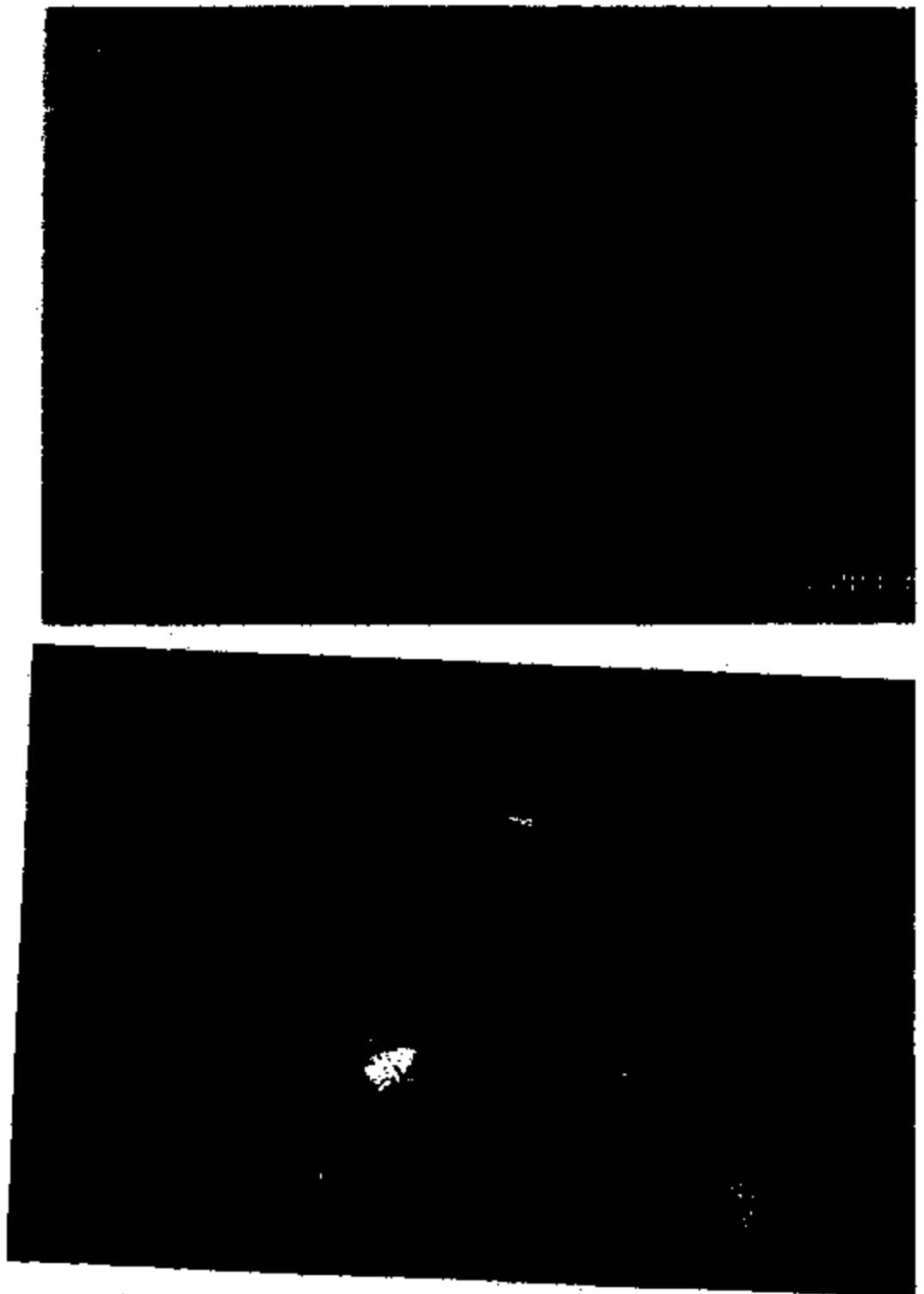
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E982-025-B 10641



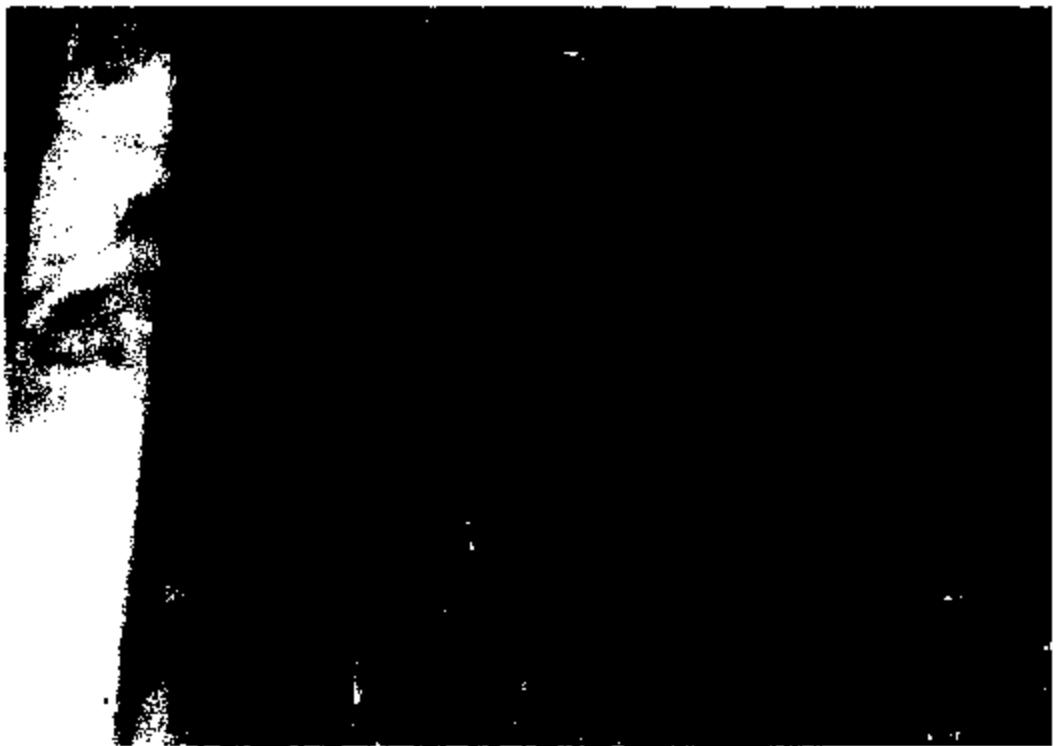
EM2-025-B 10042



PHS2-825-8 10843



2002-025-B 18644



E082-025-B 10645



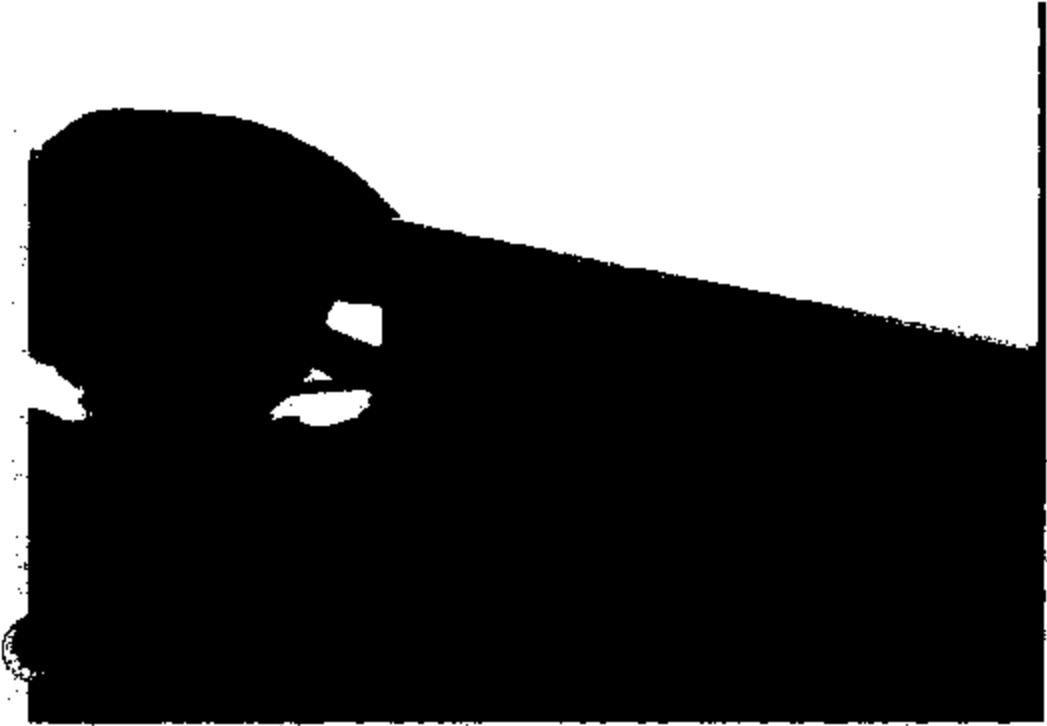
EP62-825-6 10046



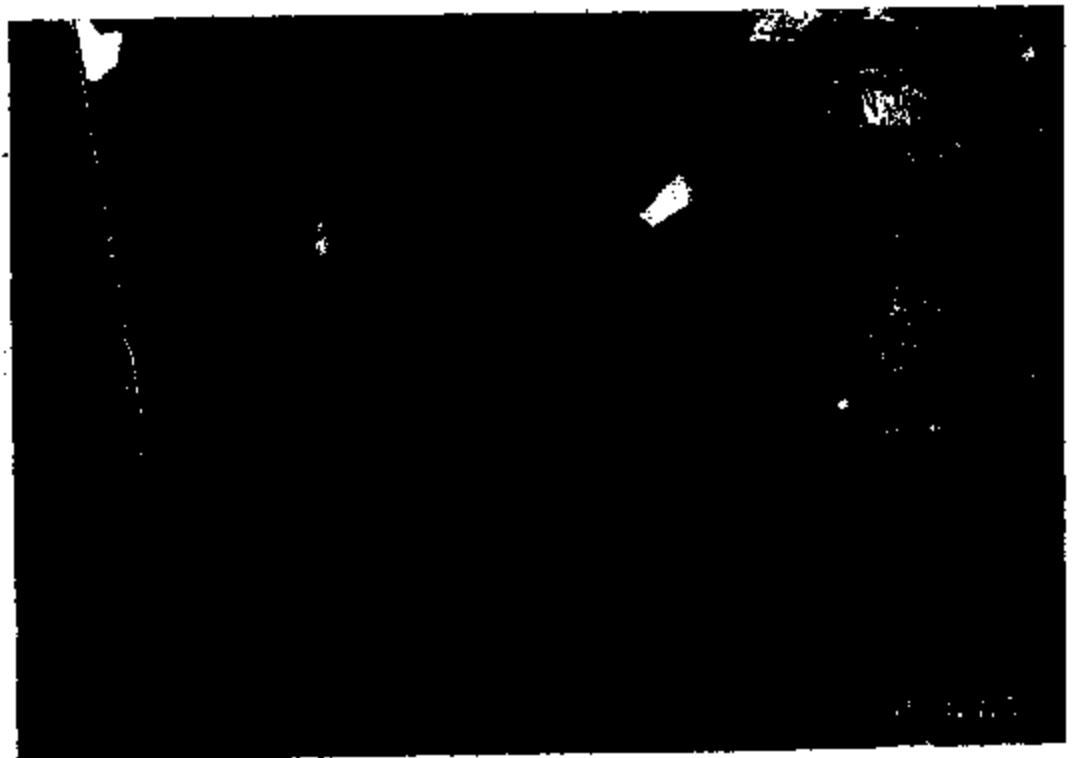
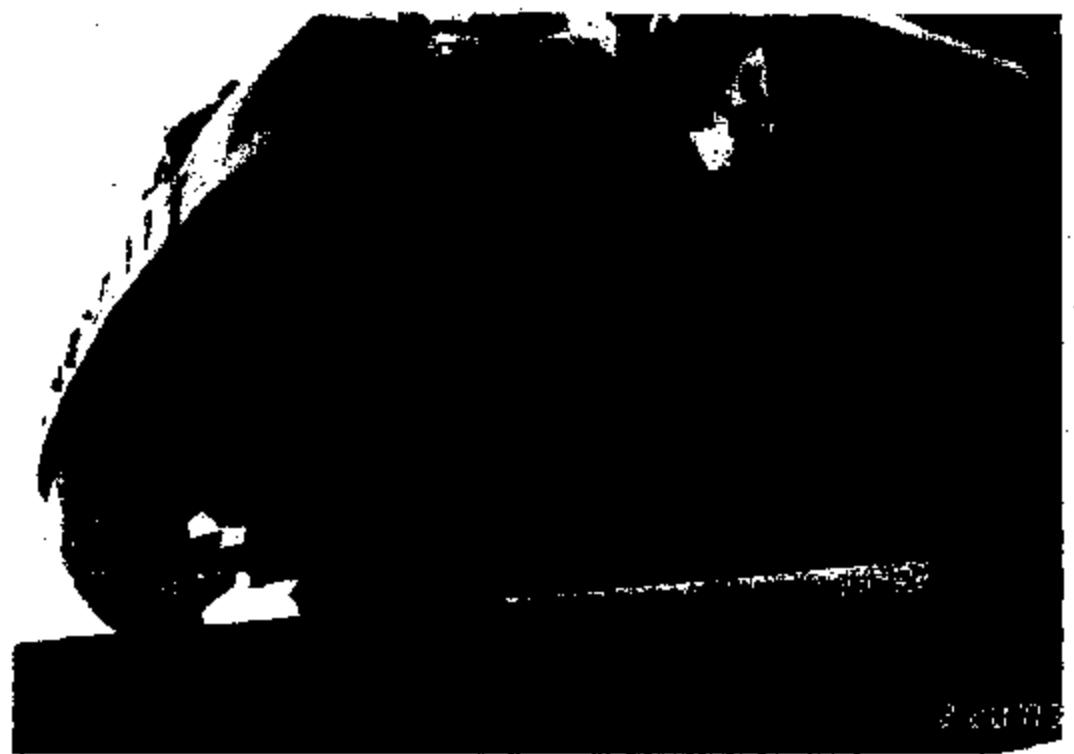
EM2-825-B 16847



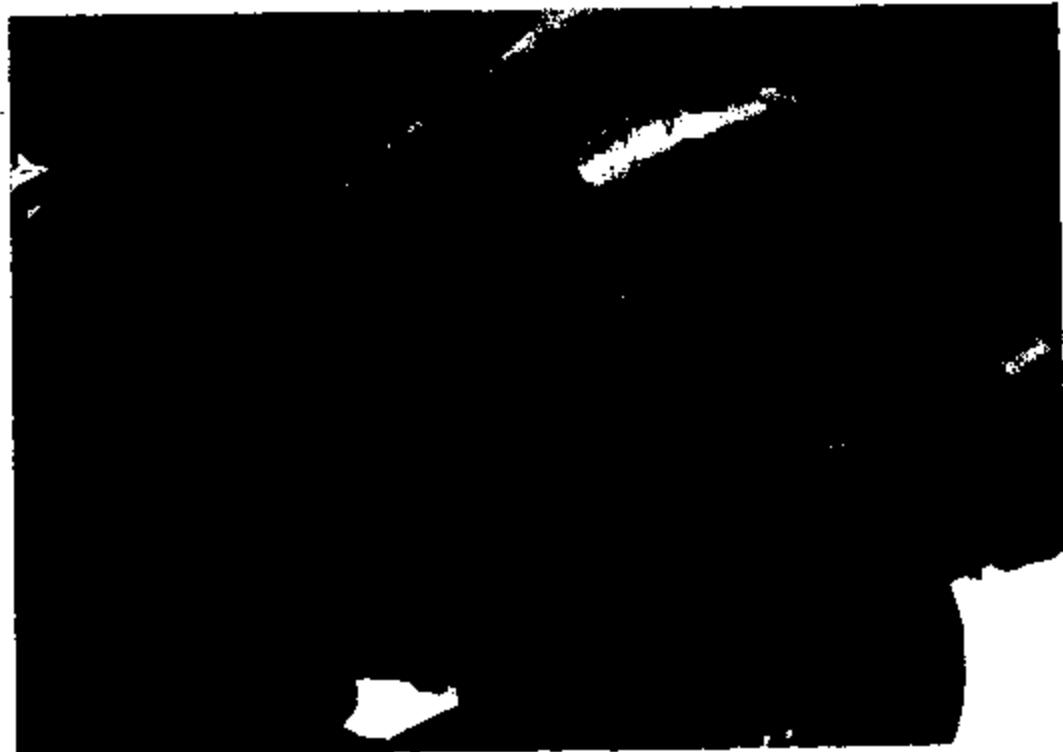
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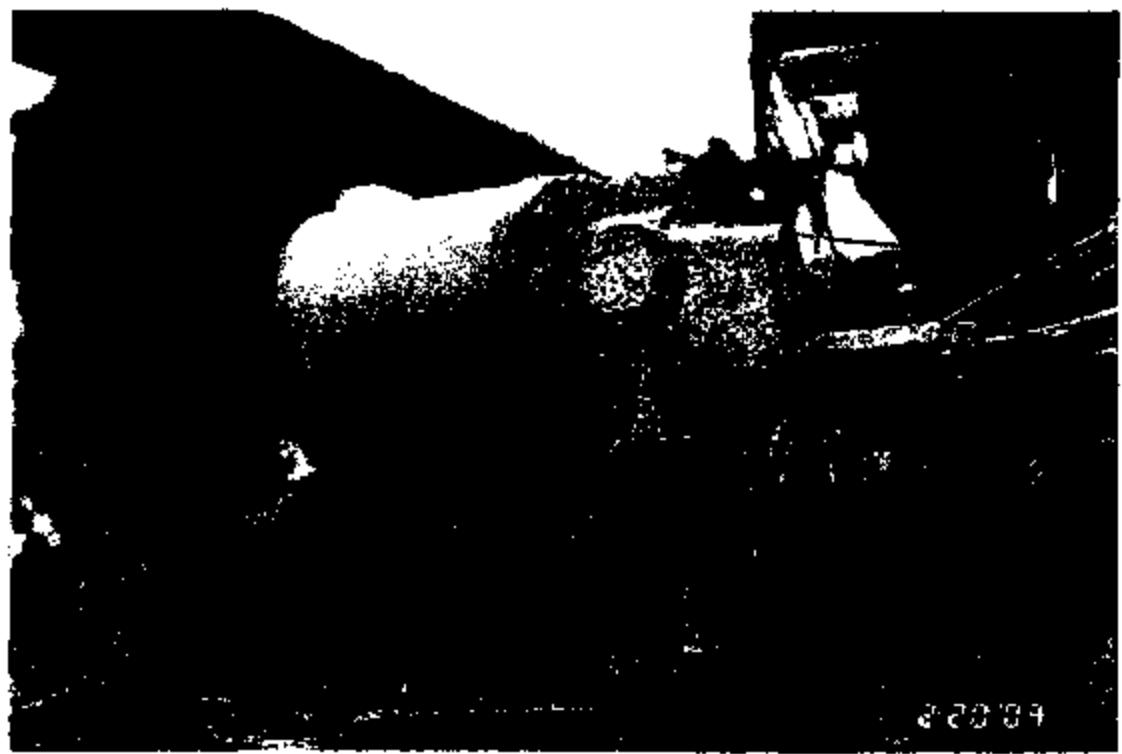
2002-025-B 10040



0902-025-6 10000



8002-025-8 16651



2002-028-8 18882



ENR2-025-B 10683

LAW OFFICES
LUTHER-ANDERSON
Professional Limited Liability Partnership
1110 Market Street, Suite 500
P.O. Box 161
Chattanooga, Tennessee 37401-0161
Telephone: (423) 758-5284
Facsimile: (423) 265-9805

Reply to:
Christi R. Satterfield

e-mail address:
cra@lutheranderson.com

February 11, 2003

VIA FAXSIMILE (313/248-7727)

Ms. Shawn Norton
Ford Motor Company
Parklane Towers West, Suite 300
Three Parklane Boulevard
Dearborn, MI 48126-2688

RE: Allstate Claim No.: [REDACTED]
Insured: [REDACTED]
Date of Loss: 06/09/02
Our File No.: 3202.28070

471119
J

Dear Ms. Norton:

Our firm has been retained to represent Allstate Insurance Company as subrogee for [REDACTED] as a result of an incident which occurred on August 8, 2002.

The purpose of this letter is to inform you that the vehicle involved in the above referenced incident, the 1993 Lincoln Towncar, is currently located at Verestar of Chattanooga, confirmation number 29033888, phone number (423)624-2102, where it will remain for the next two weeks. In two weeks, the vehicle will be turned over to [REDACTED], the owner of the vehicle. Therefore, a representative from Ford Motor Company will need to inspect the car within the next two weeks or, thereafter, coordinate any such efforts with [REDACTED].

Please let me know if I can be of further assistance to you. If you have any questions or concerns, please feel free to contact me. Thank you for your time and attention in this matter.

Sincerely,

Christi R. Satterfield
CHRISTI R. SATTERFIELD

CRS:kma

cc: Ms. Jeannette Burns (Via Email)

ENR2-625-B 10004

Ford Motor Company

ENVIRONMENTAL AND CONFIDENTIAL

Office of the General Counsel

Ford Motor Company
Partners Tower West
Suite 300
Three Partners Boulevard
Dearborn, Michigan 48125-2660

April 28, 2008

Law Offices
Luther-Anderson
1110 Market Street, Suite 500
P.O. Box 161
Chattanooga, TN 37401-0161
ATTENTION: CHRISTI R. SATTERFIELD

Re: Claimant: [REDACTED]
D/E: August 9, 2002
Y/Claim #: [REDACTED]

Dear Ms. Satterfield:

As you may be aware our expert completed his inspection. His inspection revealed no evidence of a design or manufacturing defect present, which would have caused the accident to occur as alleged.

Therefore, we must respectfully deny this claim.

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

Sincerely,

Shawn L. Norton
Claims Analyst

Allstate®

ALLSTATE INSURANCE COMPANY
P.O. BOX 21169
ROANOKE VA 24019

12/21/02



FORD MOTOR CO.
3 PARK LANE BLVD 300
DEARBORN MI 48126

IN REPLY REFER TO:

CLAIM NUMBER: [REDACTED]

OUR INSURED:

ACCIDENT DATE: 08/08/02

LOCATION: 2907 KENDALE DR

AMOUNT OF LOSS: \$ 47,131.20

CHATTANOOGA TN

OUR INVESTIGATION OF THE LOSS IN WHICH YOU WERE INVOLVED
INDICATES THAT YOU ARE RESPONSIBLE FOR THE DAMAGES SUSTAINED
BY OUR POLICYHOLDER.

WE HAVE MADE A SETTLEMENT WITH OUR INSURED AND OUR INSURED'S
CLAIM AGAINST YOU HAS BEEN ASSIGNED TO US.

IF YOU ARE NOT INSURED FOR THIS LOSS, PLEASE CONTACT THIS
OFFICE TO NEGOTIATE PAYMENT.

IF YOUR INSURANCE DOES COVER THIS LOSS, JUST FILL IN THE
INFORMATION ABOUT YOUR INSURANCE COMPANY BELOW AND RETURN THIS
LETTER IN THE ENCLOSED ENVELOPE. WE WILL THEN GET IN TOUCH
WITH YOUR INSURANCE COMPANY.

SINCERELY,
RECOVERY DEPARTMENT
ALLSTATE INSURANCE COMPANY

REDACTED

CAO:H

I CARRY INSURANCE POLICY NO. _____

WITH

NAME OF COMPANY _____

AGENT

MY ADJUSTER (CHOOSE ONE) IS _____

MY CLAIM NO IS _____

ADDRESS _____

I HAVE REPORTED (OR WILL REPORT) THIS LOSS TO MY INSURANCE
COMPANY ____ YES ____ NO

SIGNED: _____ DATE: _____

000-020-0 10000-0

Nashville Property MCO
301 Plus Park Blvd., Ste. 400
Nashville, TN 37217
1-877-840-7291

10/11/02

Ford Motor Co.
Park Lane Towers, West #300
3 Park Lane Blvd
Dearborn, MI 48126

Re: Claim Number: [REDACTED]
Our Insured:
Date of Loss: 8/9/2002
Type of Loss: Vehicle fire causing damage to home
Loss Location: 2907 Kendale Dr. Chattanooga, TN. 37411



INITIAL NOTICE OF OUR SUBROGATION CLAIM AGAINST YOU OR COMPANY

Our investigation indicates that you (or your company) were responsible for the above loss.

Upon making payment of our insured's damages, Allstate will have the legal right to seek reimbursement from you for our damages. Please accept this letter as initial notice of our forthcoming claim and promptly present it to your "liability" insurance carrier, so they may protect your interest as well as Allstate's in this matter. If you are not insured for the loss, please contact me to negotiate payment.

Please direct your reply or correspondence to my attention while we are concluding the investigation and payment aspects of our insured's claim. Subsequently, we will be forwarding copies of our claim details, documents, and paid estimates to you (or you carrier) for consideration. At that time, you will note that our collection activity will transfer to our Property Subrogation Department:

Allstate Insurance Company
National Property Subrogation Service Center
P.O. Box 21169
3800 Electric Road, Suite 401
Roanoke, VA 24018

Please give this letter your immediate attention.

REDACTED

Sincerely,

Darl Gray
Allstate Insurance Company
301 Plus Park Blvd., Ste 400
Nashville, TN 37217
1-877-840-7291

* Please call me at 423-332-0501
so I can advise where the
vehicle is (for you all to
inspect).

Ford Motor Company

PRIVILEGED AND CONFIDENTIAL

Office of the General Counsel

Ford Motor Company
Pentagon Towers West
Suite 300
Three Postcard Boulevard
Dearborn, Michigan 48126-2556

April 28, 2003

Law Offices
Luther-Anderson
1110 Market Street, Suite 500
P.O. Box 151
Chattanooga, TN 37401-0151
ATTENTION: CHRISTI R. SATTERFIELD

Re: Claimant: [REDACTED]
D/E: August 8, 2002
Y/Claim #: [REDACTED]

Dear Ms. Satterfield:

As you may be aware our expert completed his inspection. His inspection revealed no evidence of a design or manufacturing defect present, which would have caused the accident to occur as alleged.

Therefore, we must respectfully deny this claim.

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

Sincerely,

Shawn L. Norton
Claims Analyst

E902-026 02012

Nashville Property MCO
301 Plus Park Blvd. Ste. 400
Nashville, TN 37217
1-877-840-7291



David Gray
Staff Claims Analyst
Allstate Insurance Company
301 Plus Park Blvd. Suite 400
Nashville, TN 37217
Phone: 615.844.7291 ext. 6231
Cell: 423.332.0126
Fax: 423.332.0608
Email: dgray@allstate.com

10/11/02

Ford Motor Co.
Park Lane Towers, West #300
3 Park Lane Blvd
Dearborn, MI 48126

Re: Claim Number:
Our Insured:
Date of Loss:
Type of Loss:
Loss Location:

[REDACTED]
8/9/2002

Vehicle fire causing damage to home
2907 Kendale Dr. Chattanooga, TN. 37411



INITIAL NOTICE OF OUR SUBROGATION CLAIM AGAINST YOU OR COMPANY

Our investigation indicates that you (or your company) were responsible for the above loss.

Upon making payment of our insured's damages, Allstate will have the legal right to seek reimbursement from you for our damages. Please accept this letter as initial notice of our forthcoming claim and promptly present it to your "liability" insurance carrier, so they may protect your interest as well as Allstate's in this matter. If you are not insured for the loss, please contact me to negotiate payment.

Please direct your reply or correspondence to my attention while we are concluding the investigation and payment aspects of our insured's claim. Subsequently, we will be forwarding copies of our claim details, documents, and paid estimates to you (or your carrier) for consideration. At that time, you will note that our collection activity will transfer to our Property Subrogation Department:

Allstate Insurance Company
National Property Subrogation Service Center
P.O. Box 21169
3000 Electric Road, Suite 401
Roanoke, VA 24018

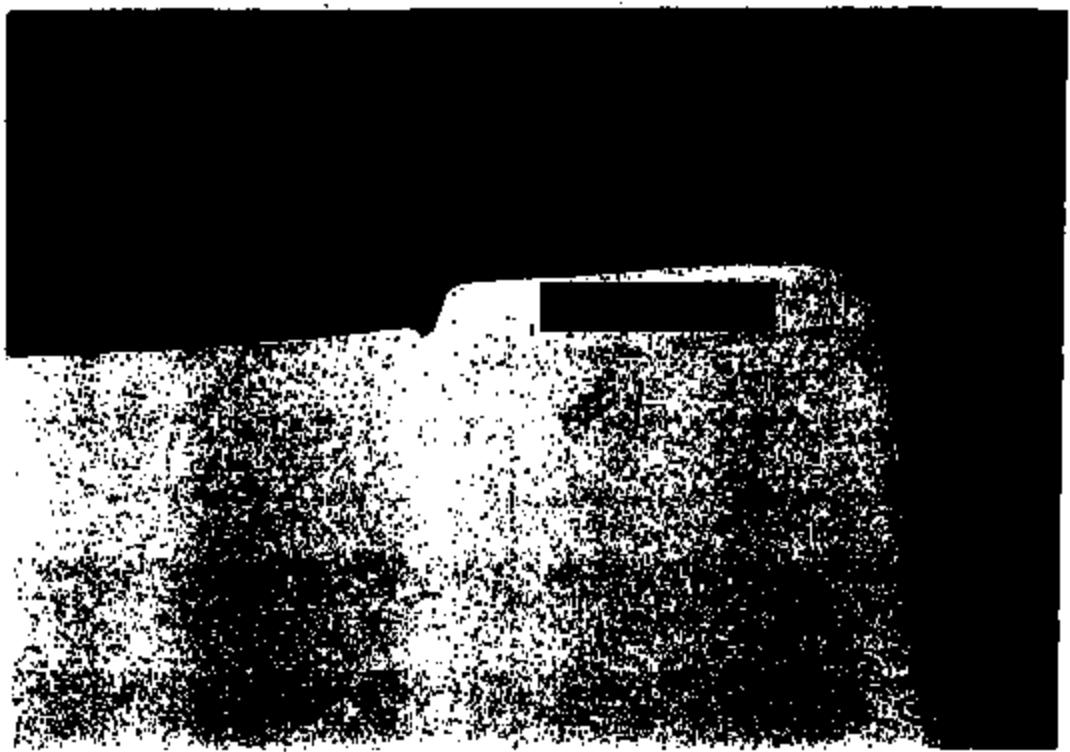
REDACTED

Please give this letter your immediate attention.

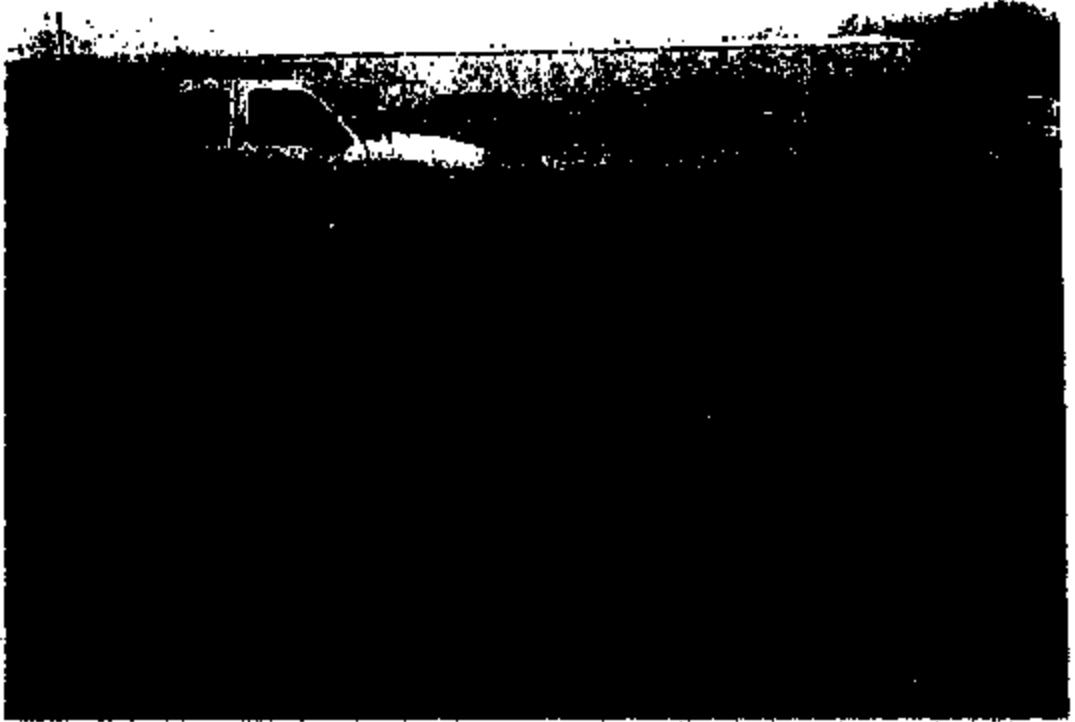
Sincerely,

David Gray
Allstate Insurance Company
301 Plus Park Blvd., Ste 400
Nashville, TN 37217
1-877-840-7291

* Please call me at 423-332-0501
so I can advise where the
vehicle is for you all to
inspect.



2002-025 52014



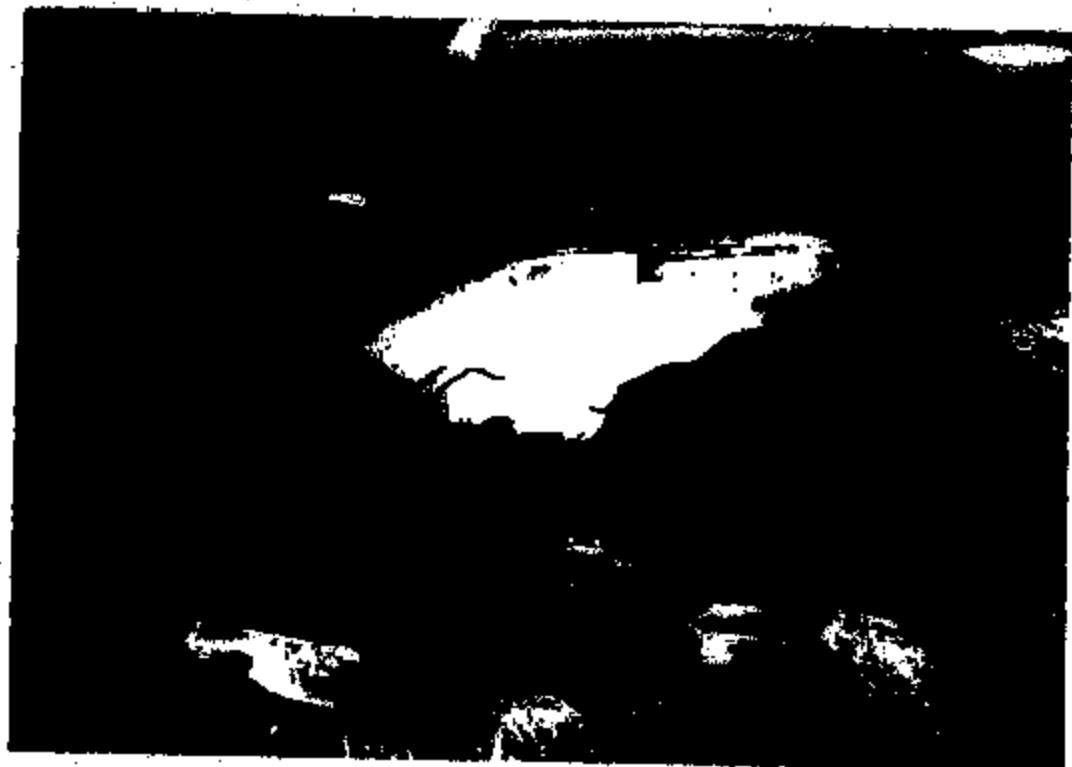
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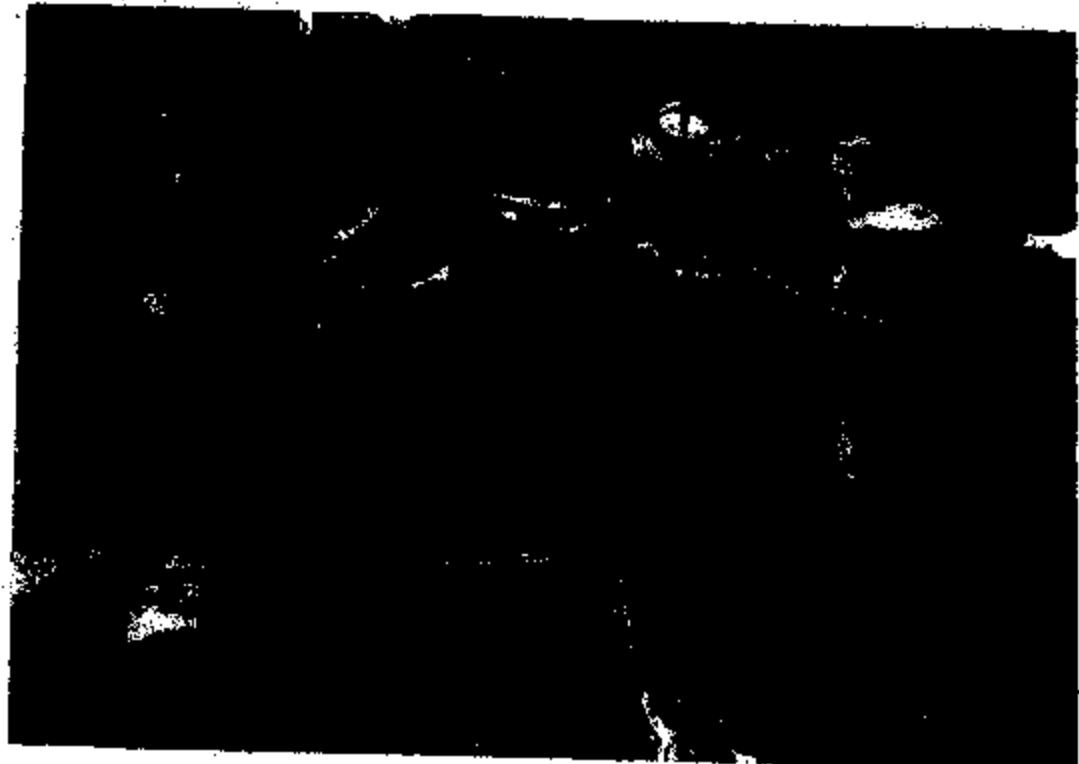
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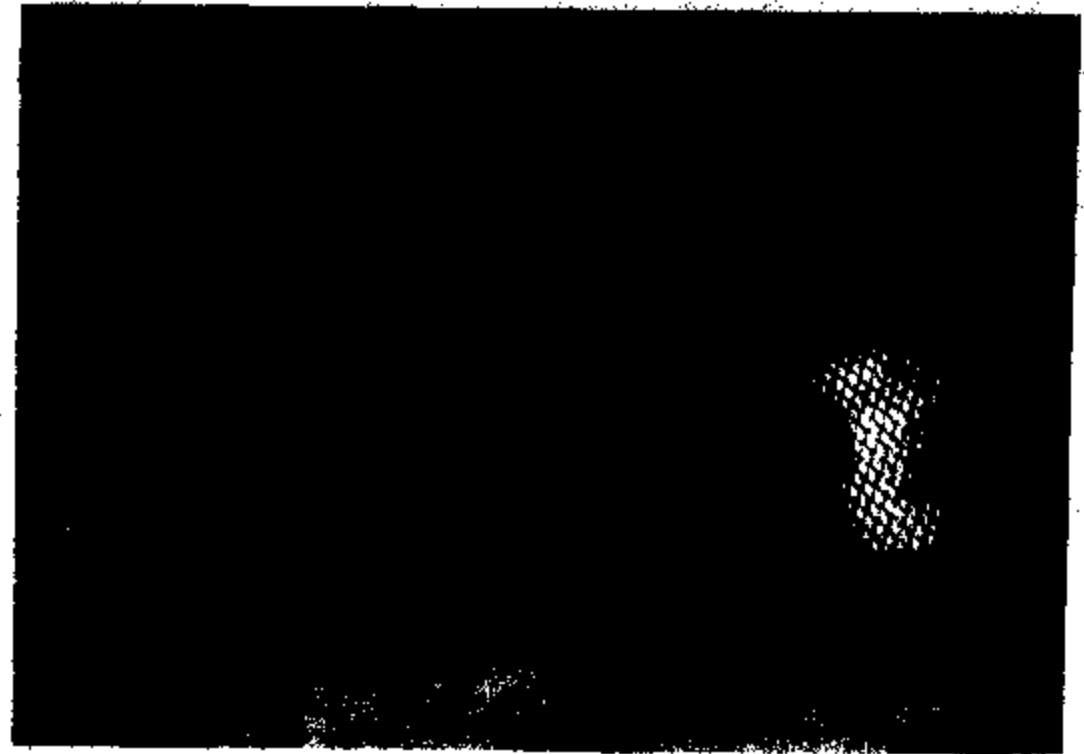
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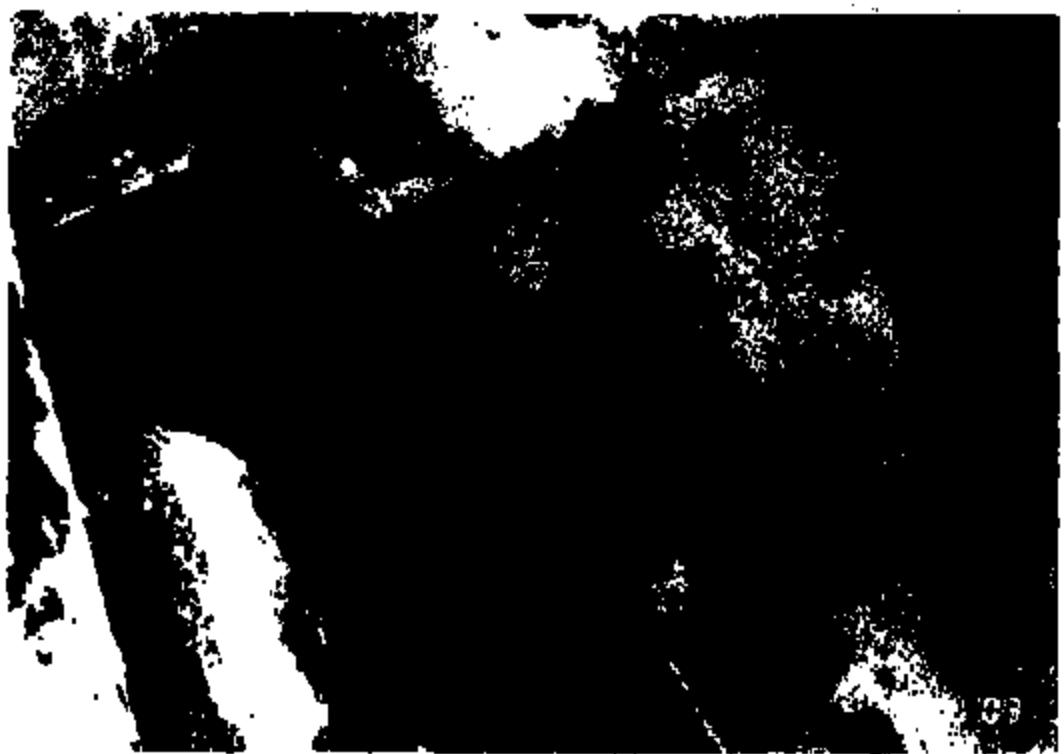
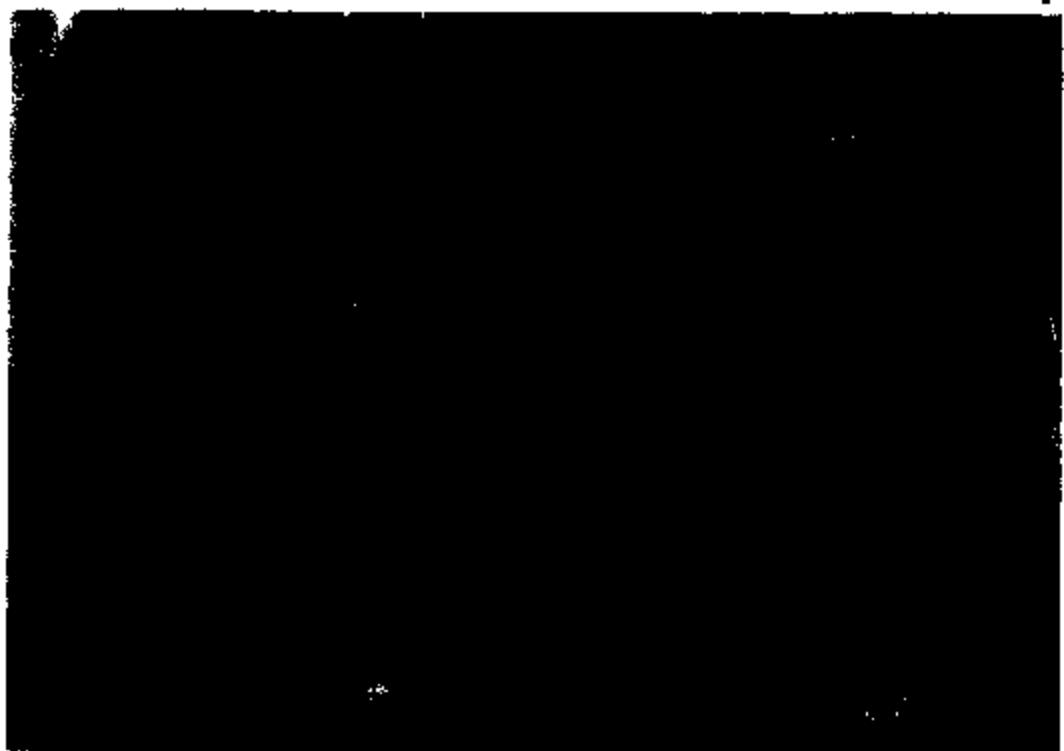
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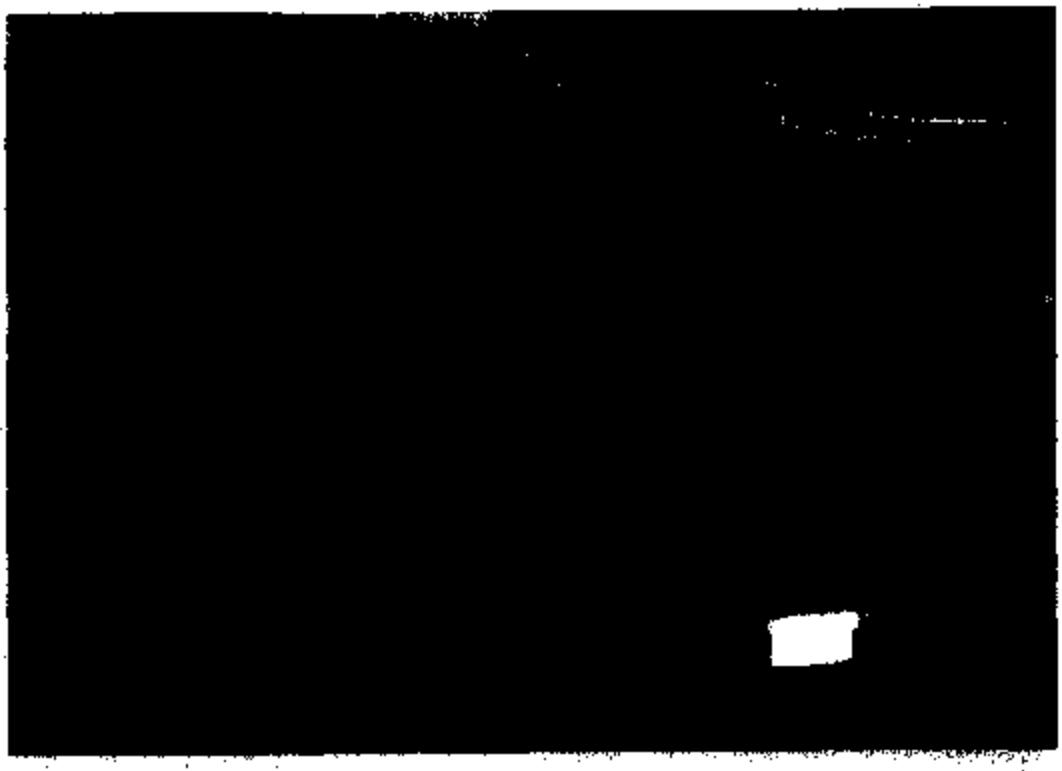
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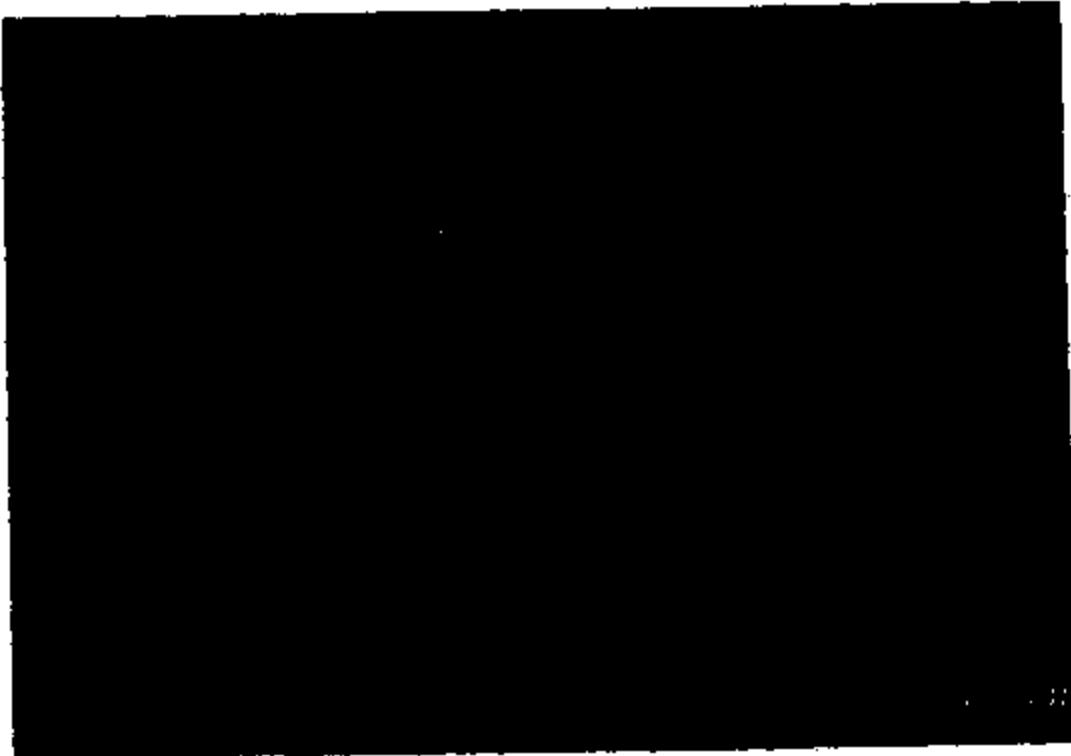
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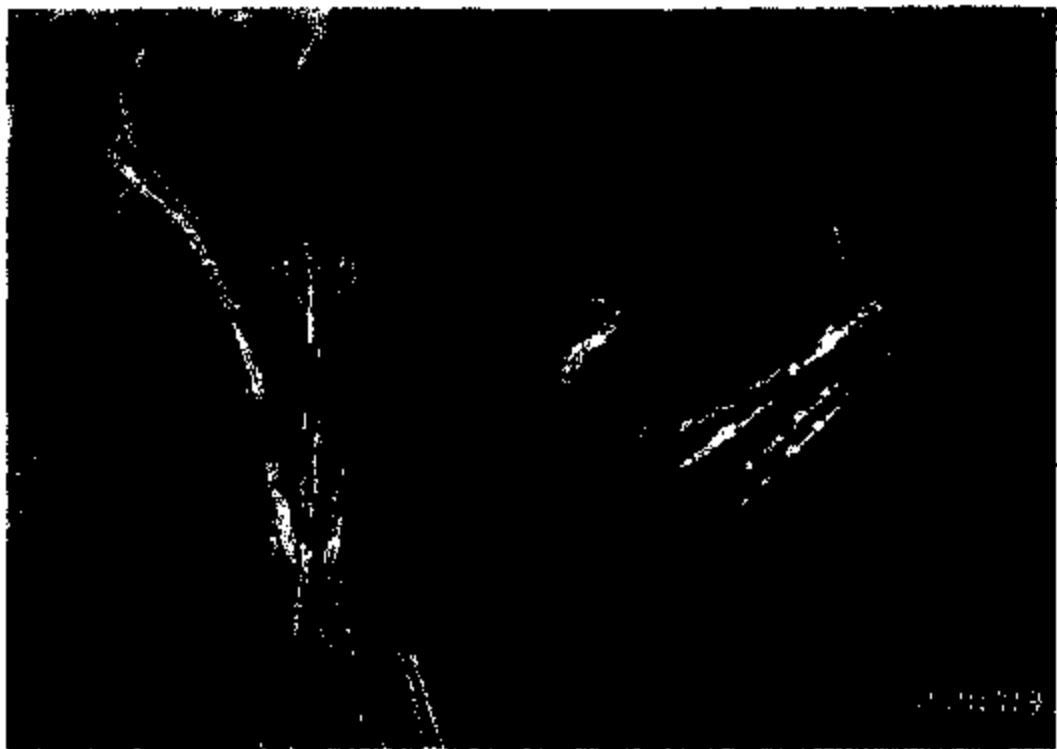
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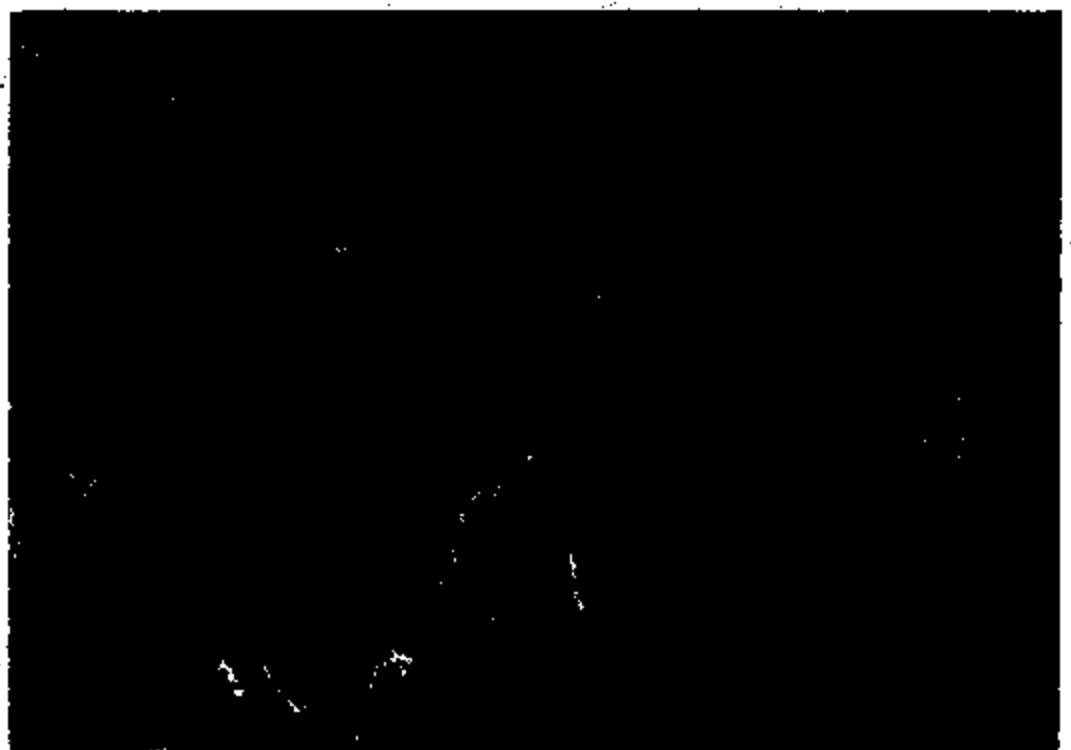
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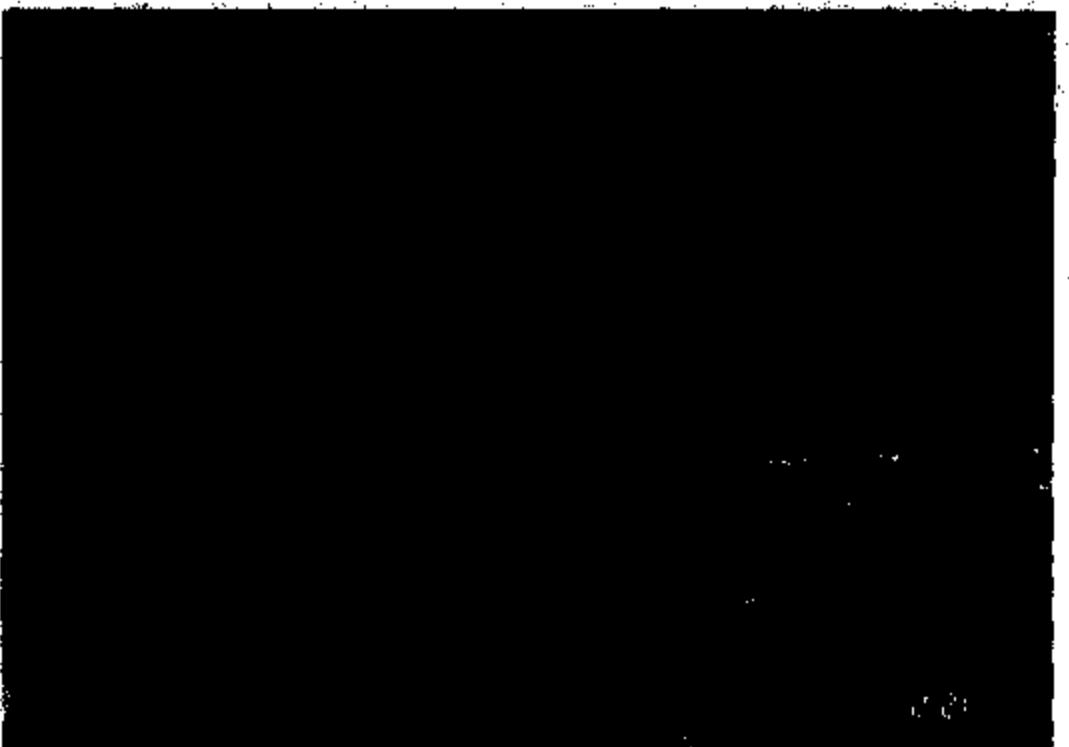
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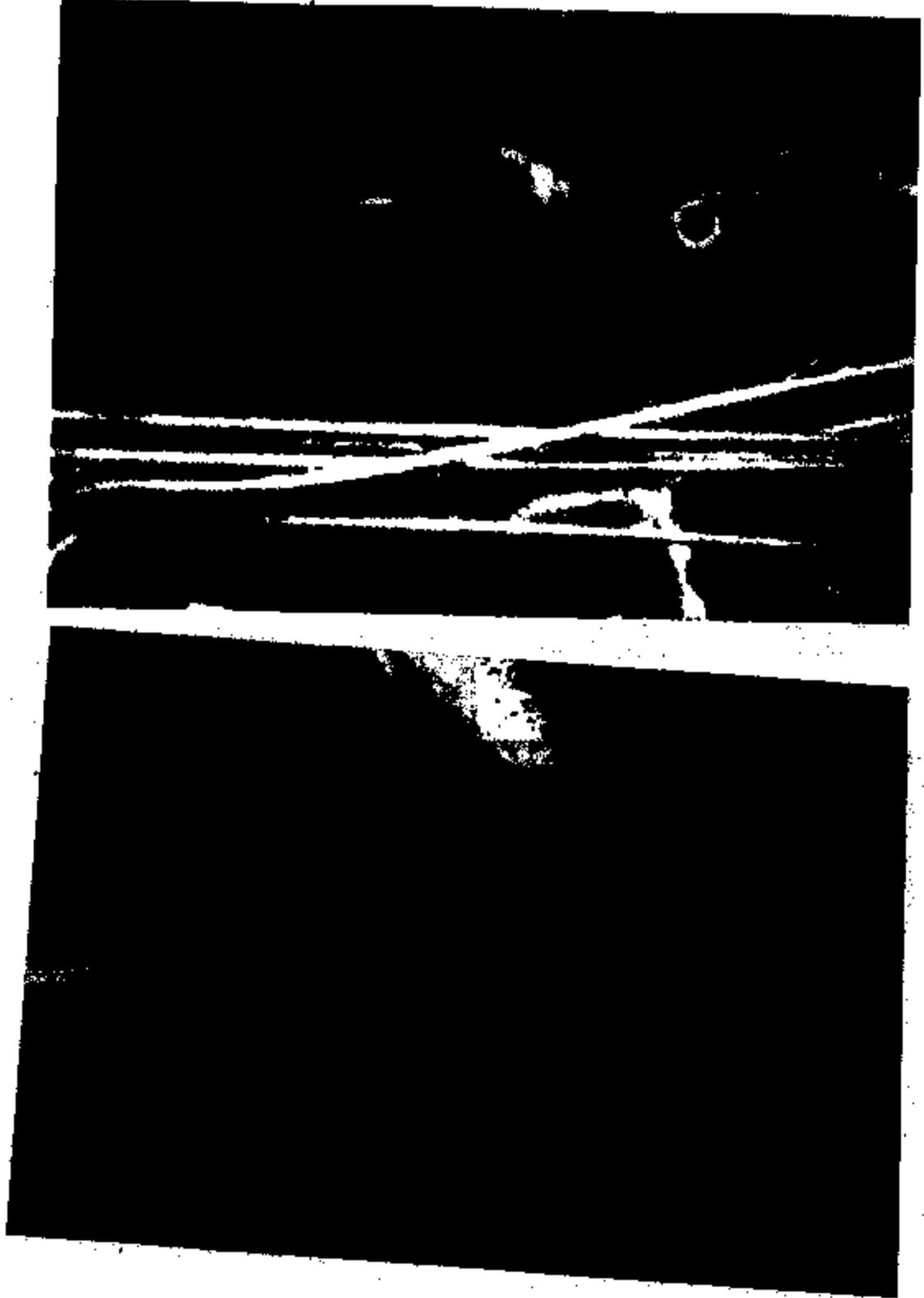
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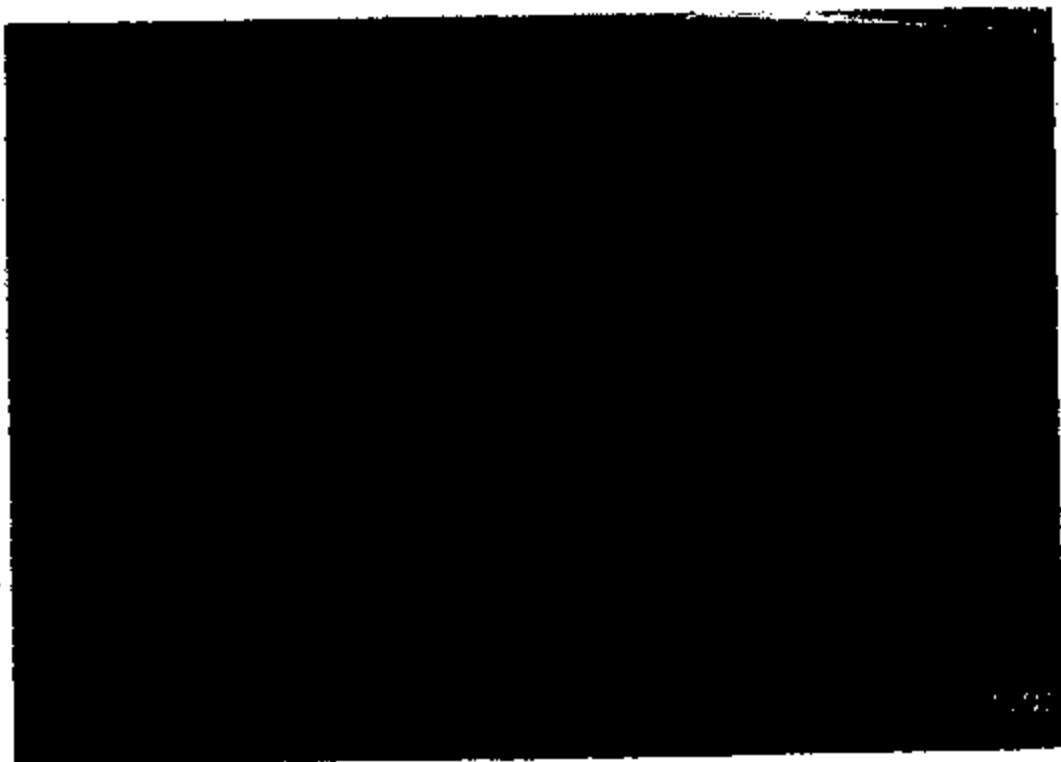
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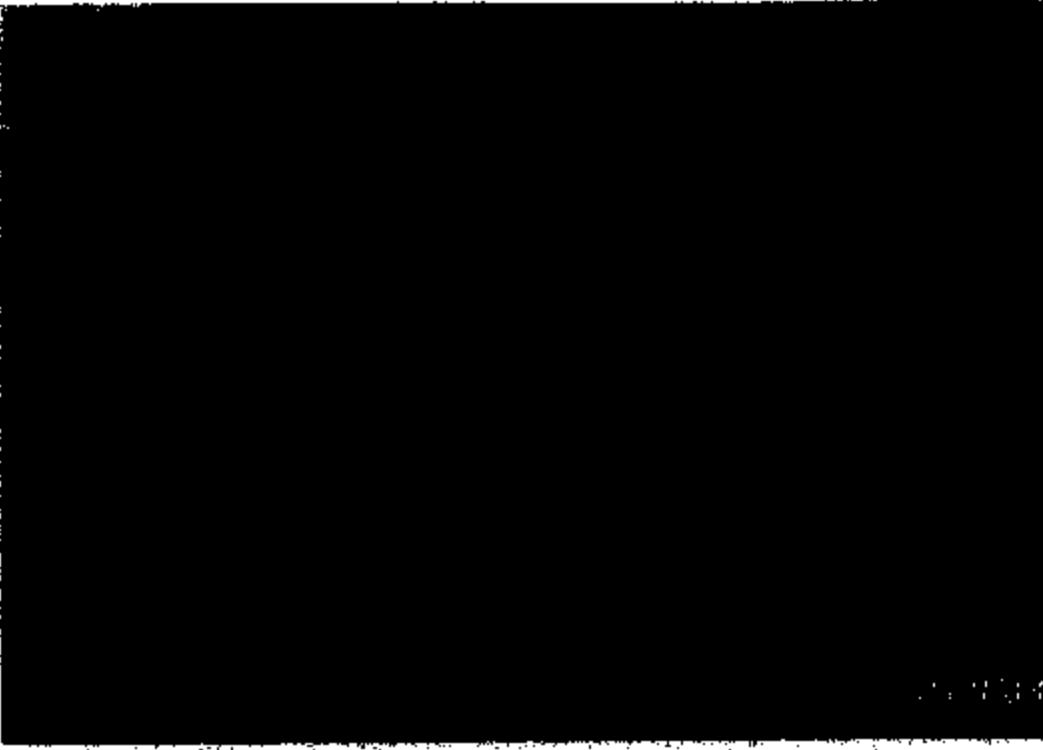
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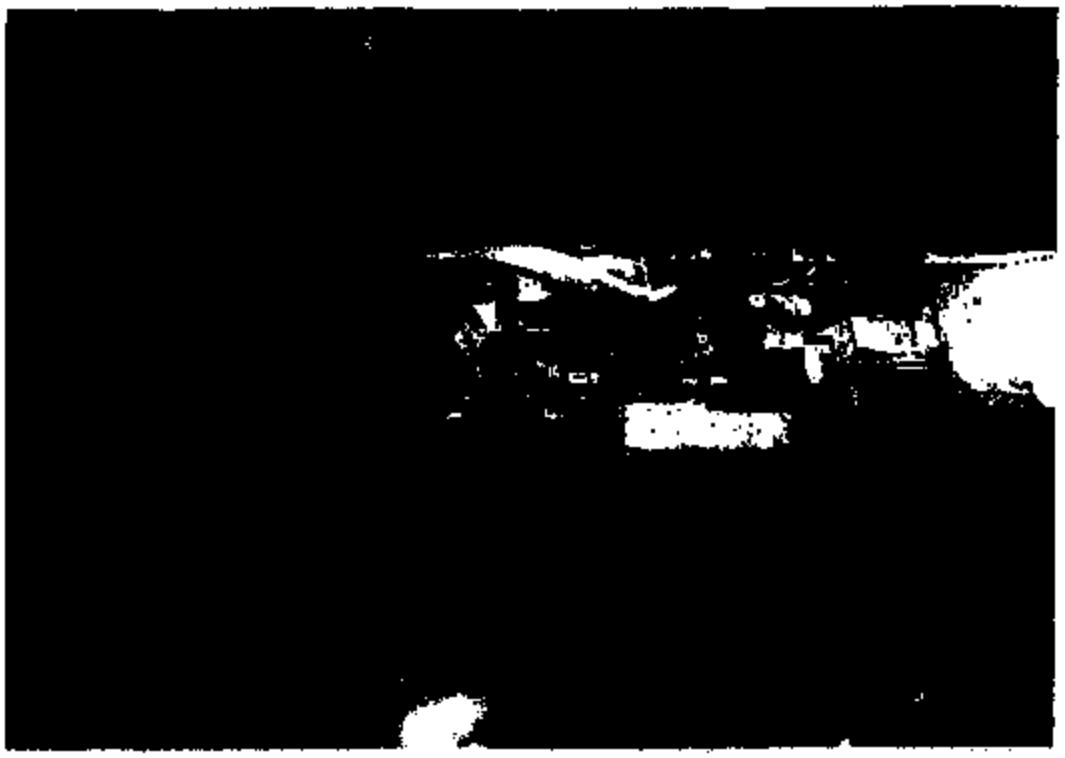
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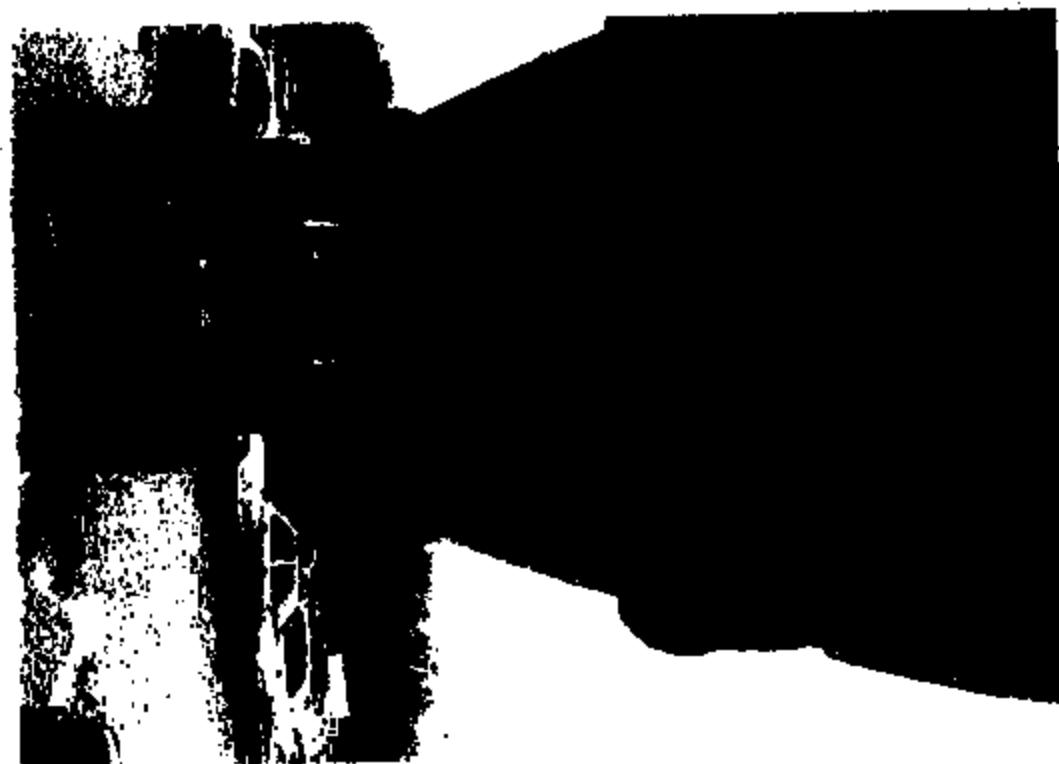
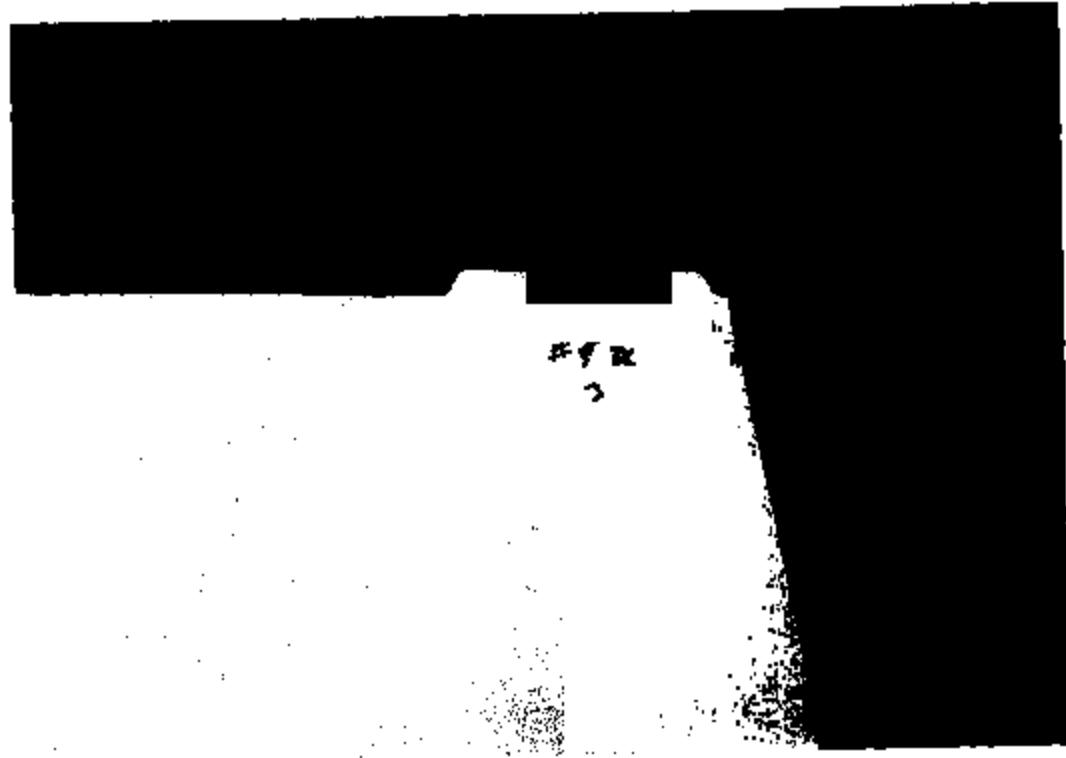
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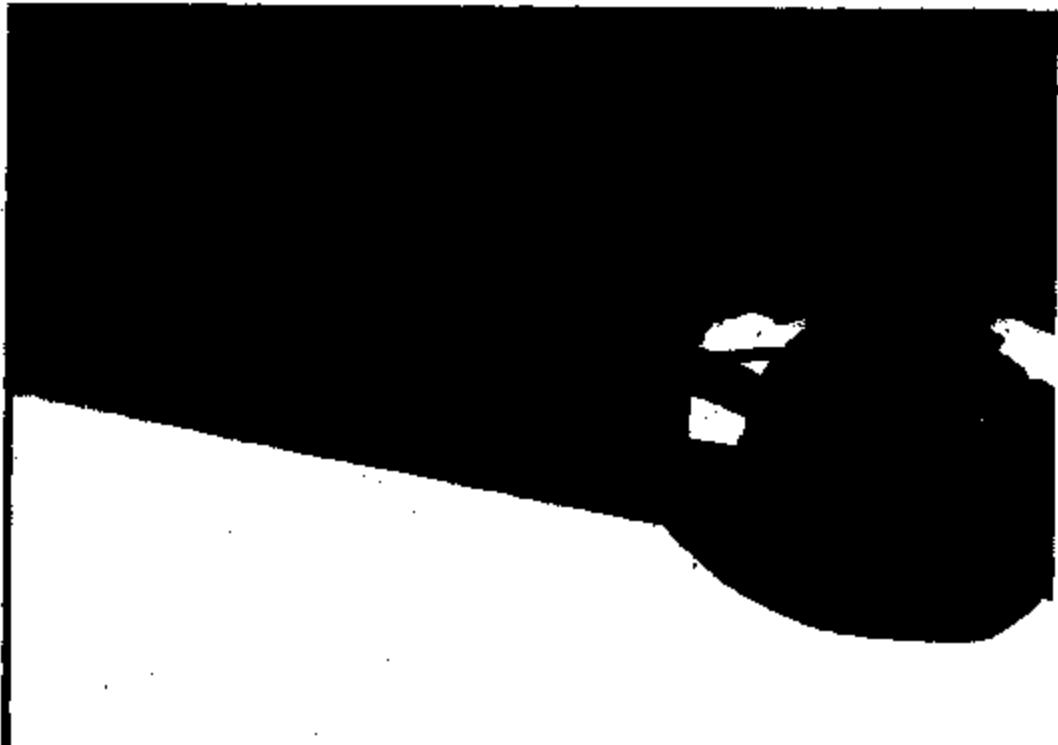
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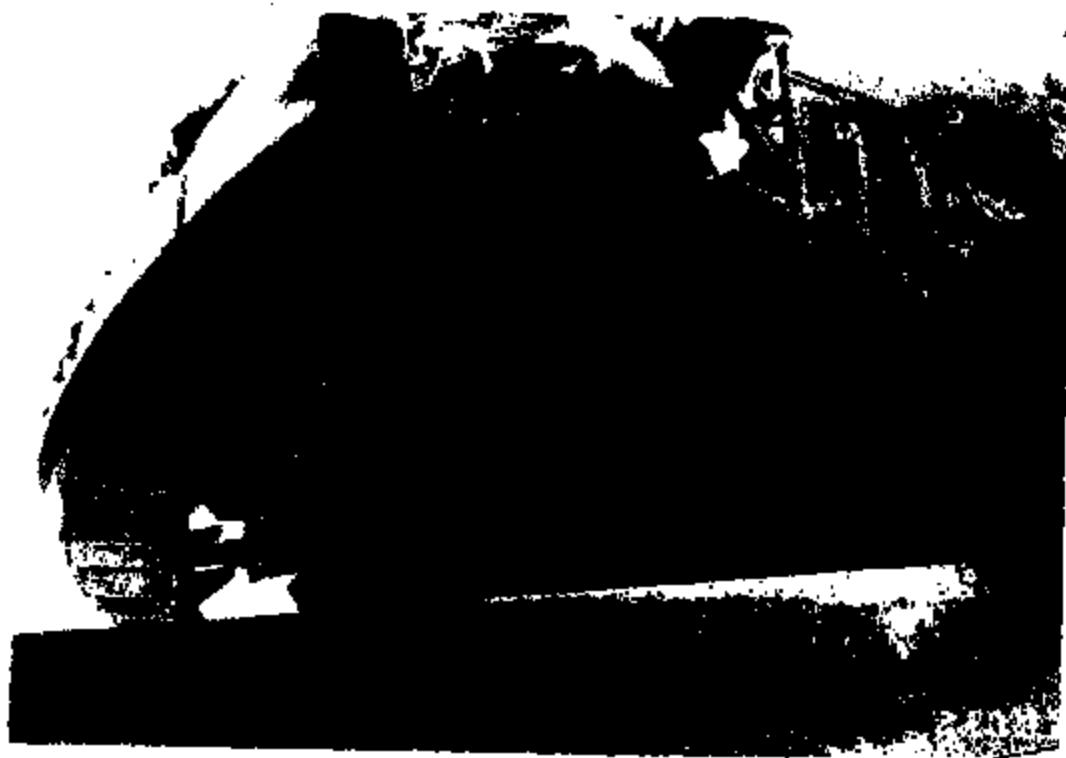
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