

**EA02-025**

**FORD 10/27/03**

**LETTER TO ODI**

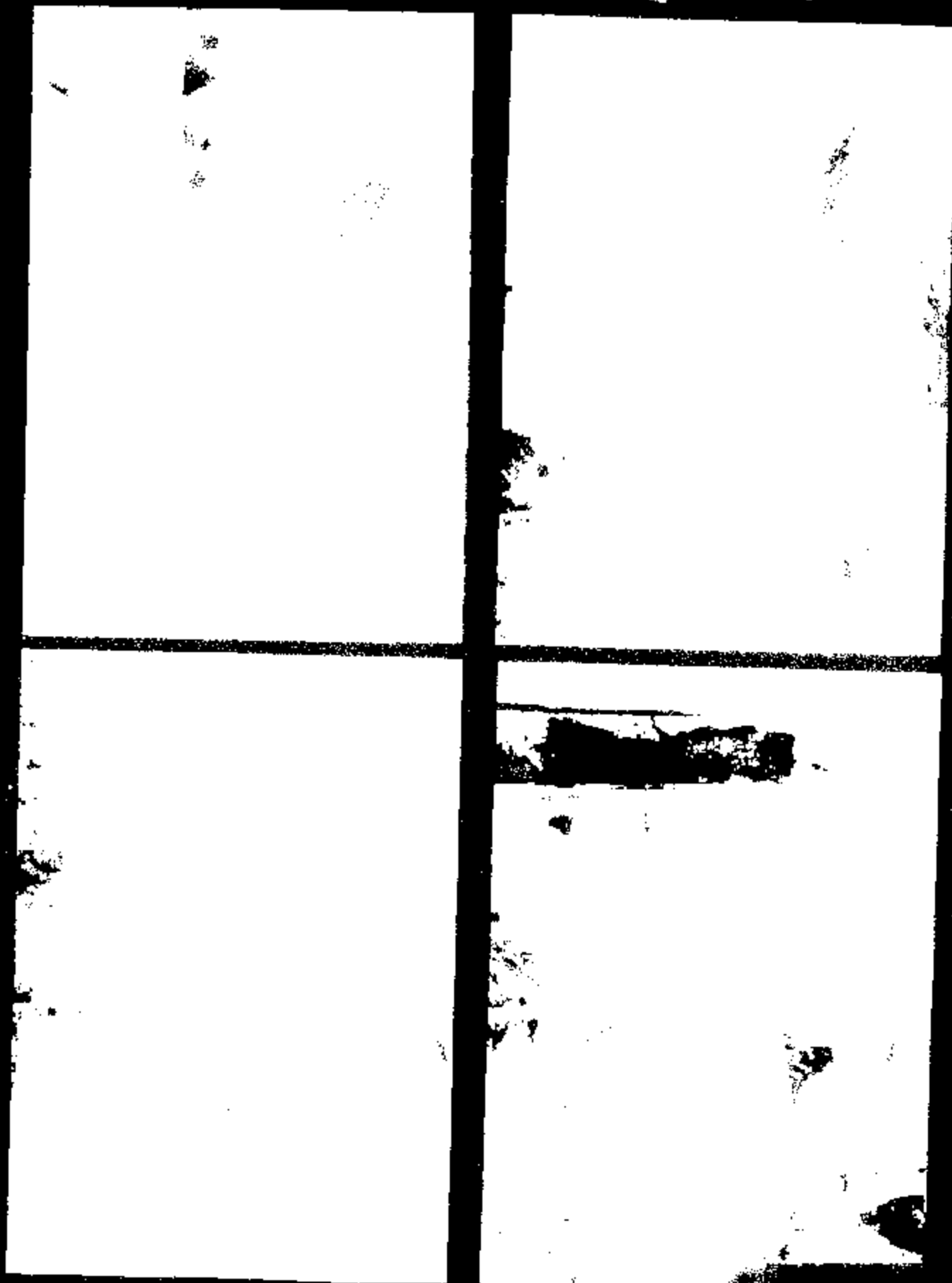
**APPENDIX M**

**BOOK 11 OF 22**

**PART A-D**

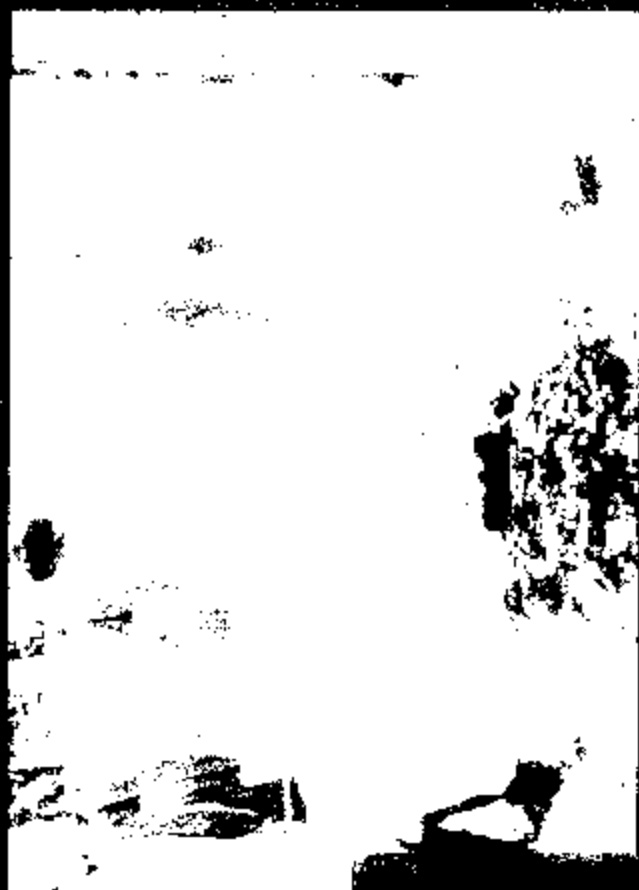
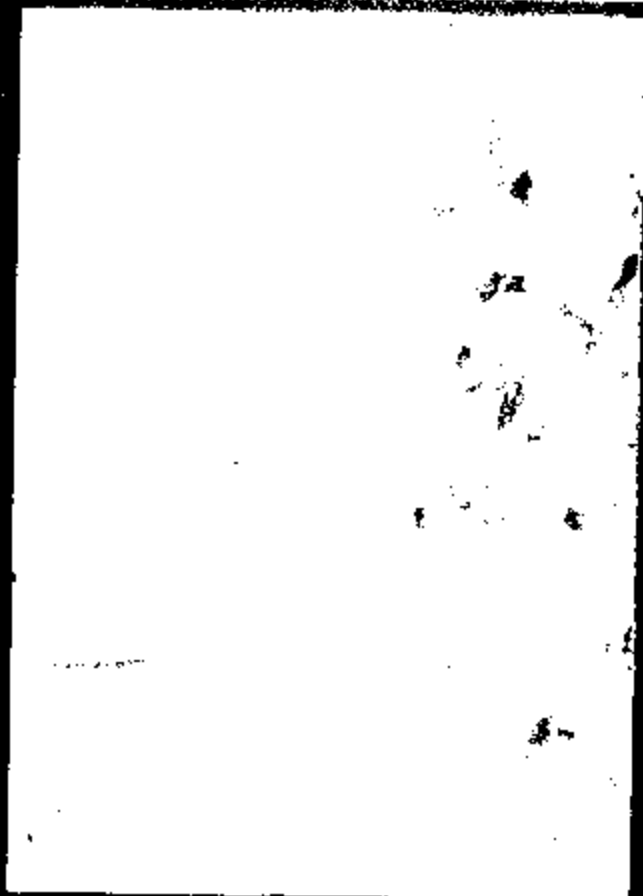
**PART D**

18 2035 171



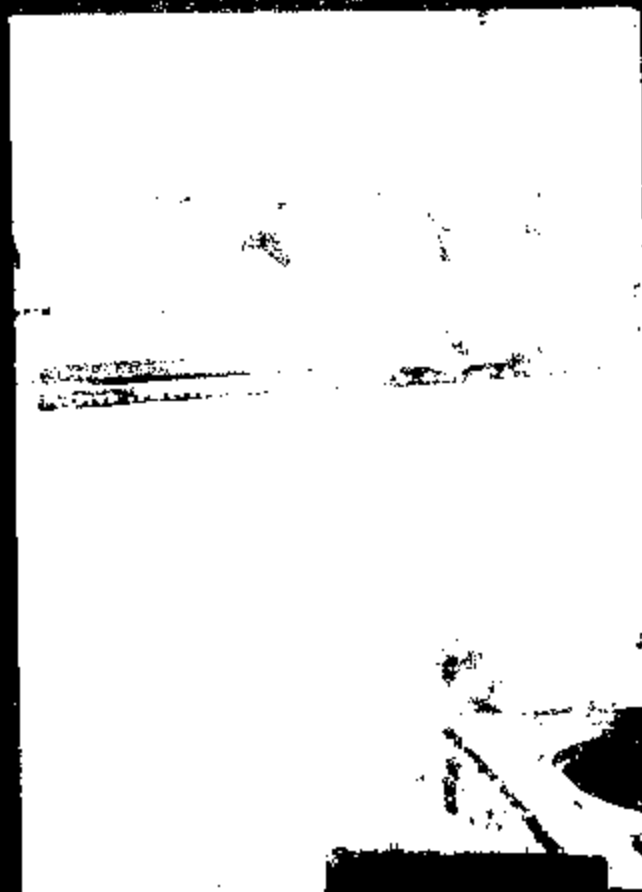
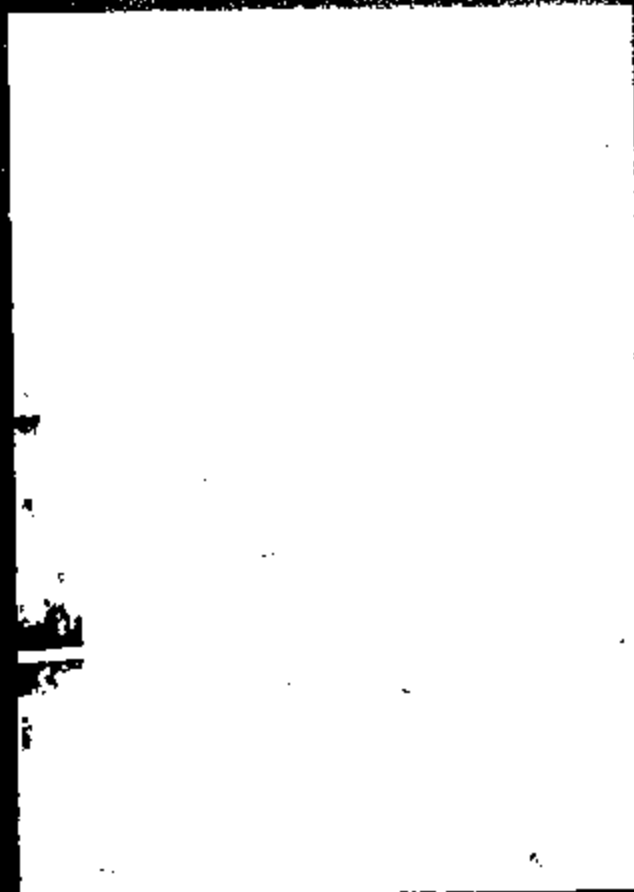
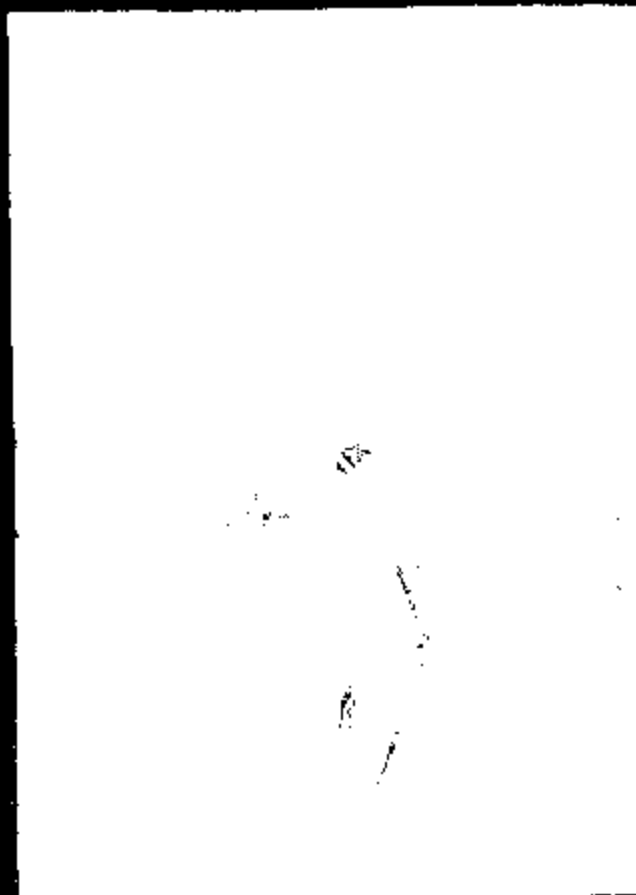
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18 2035 171



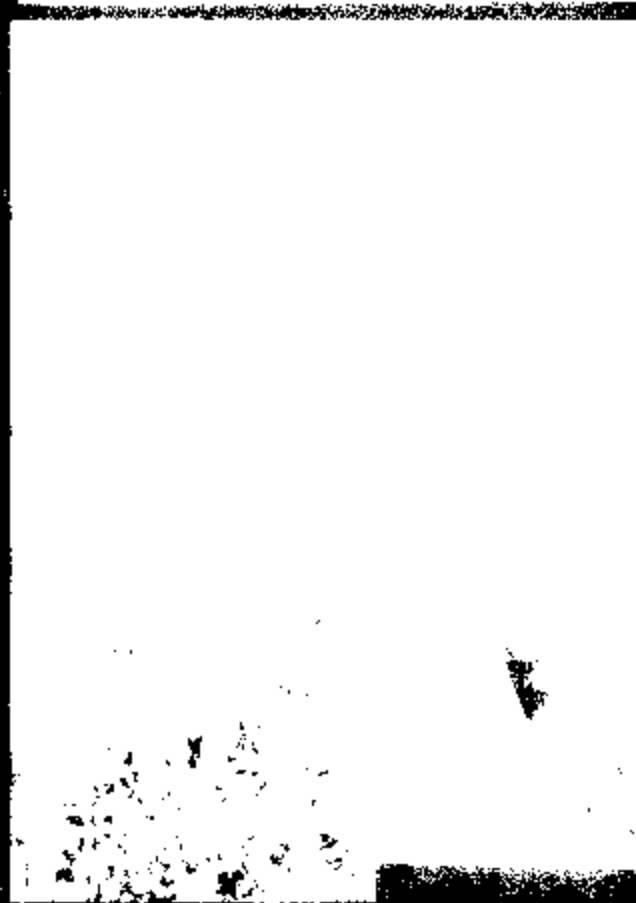
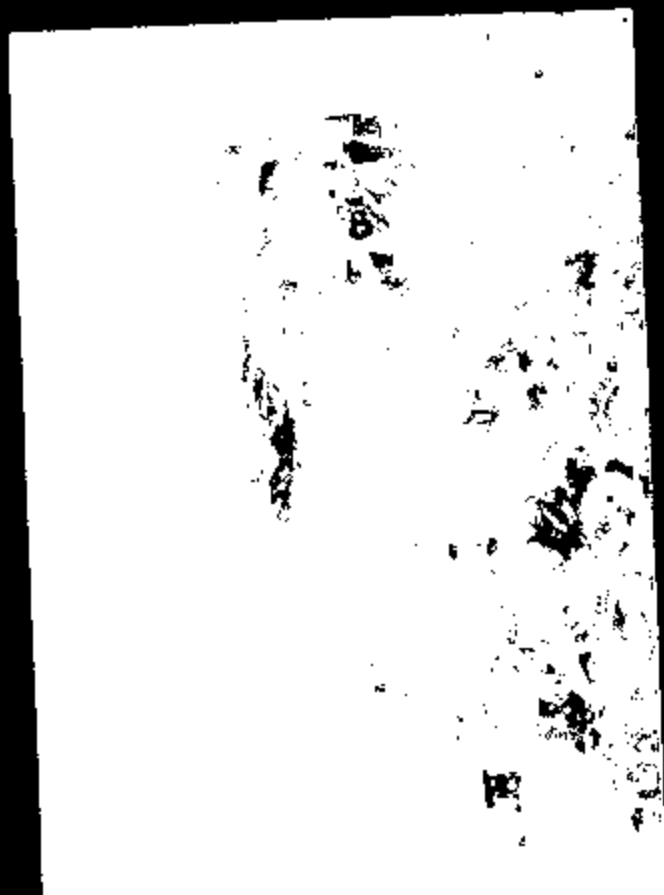
8002-025 31000

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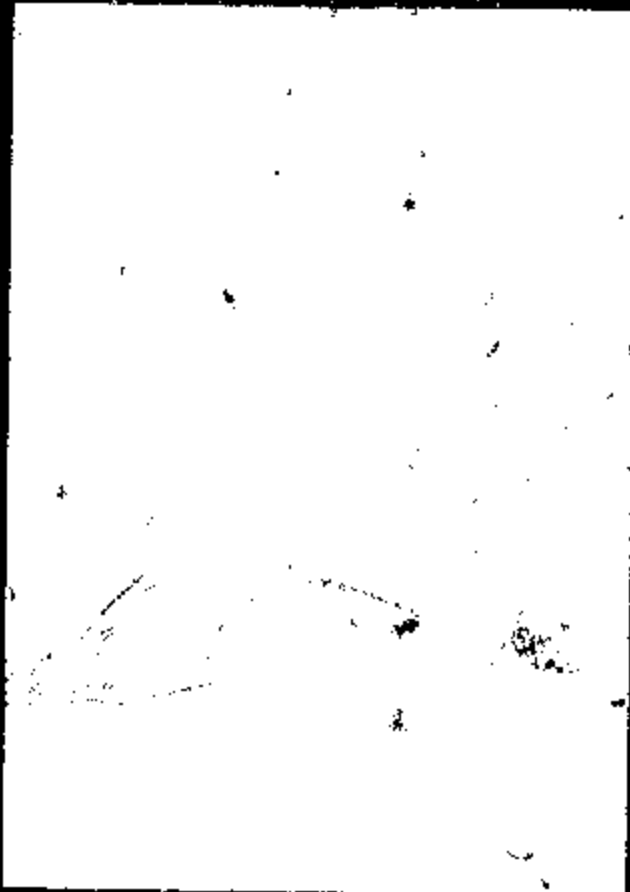
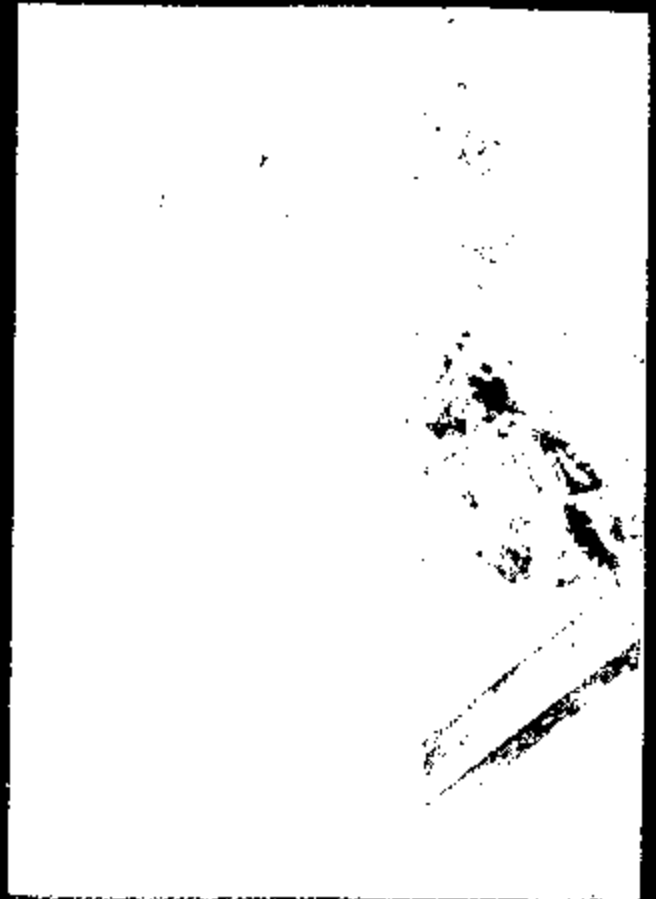
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18 2035 171



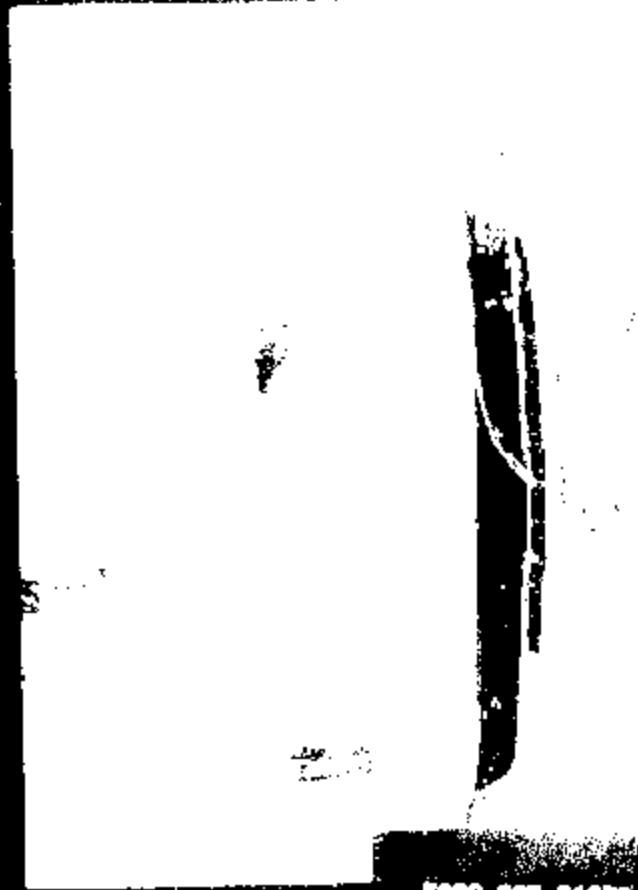
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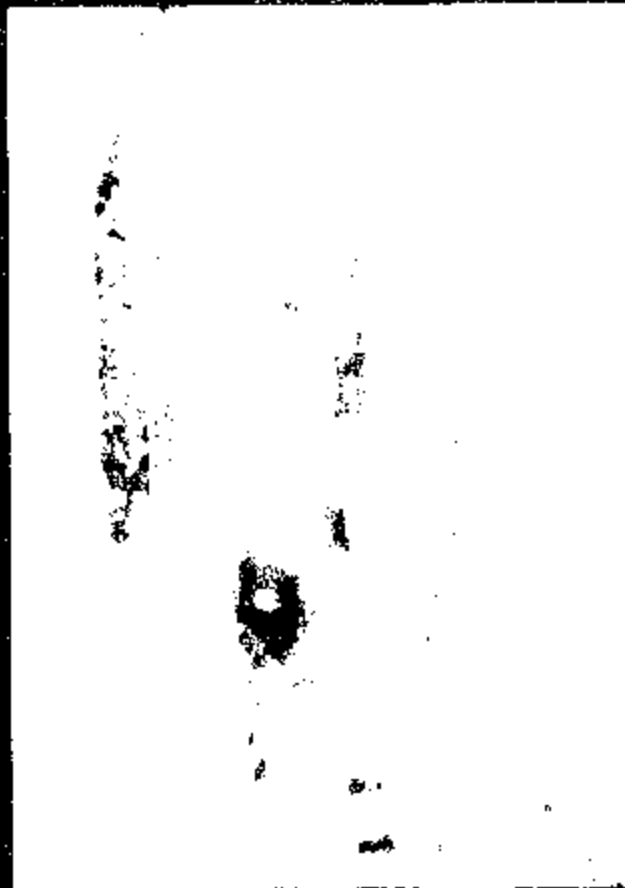
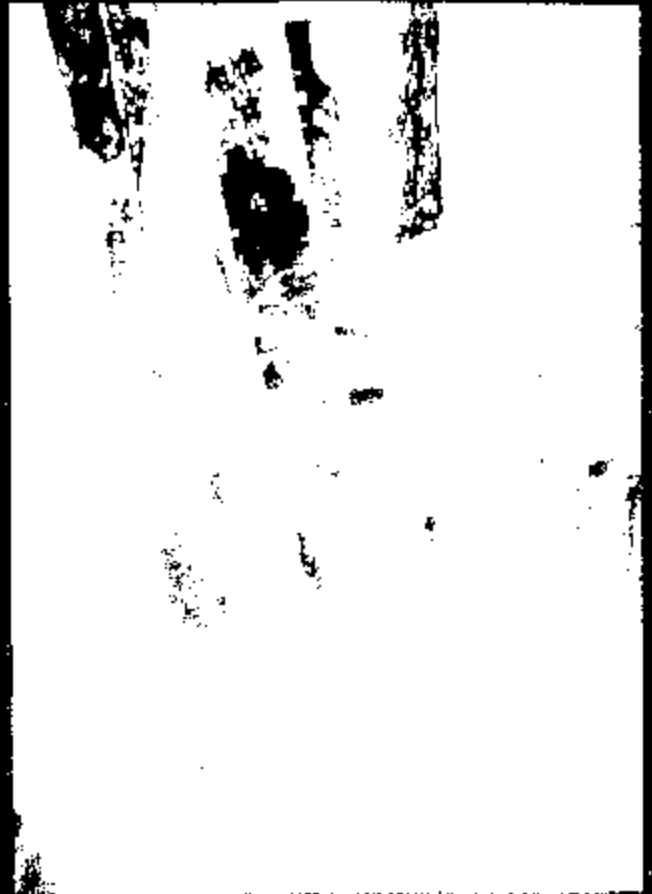
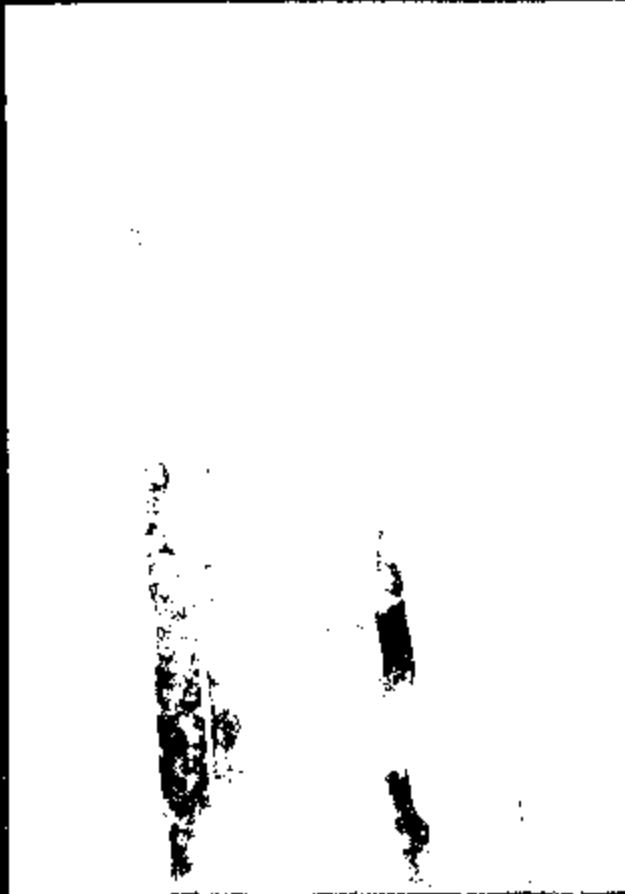
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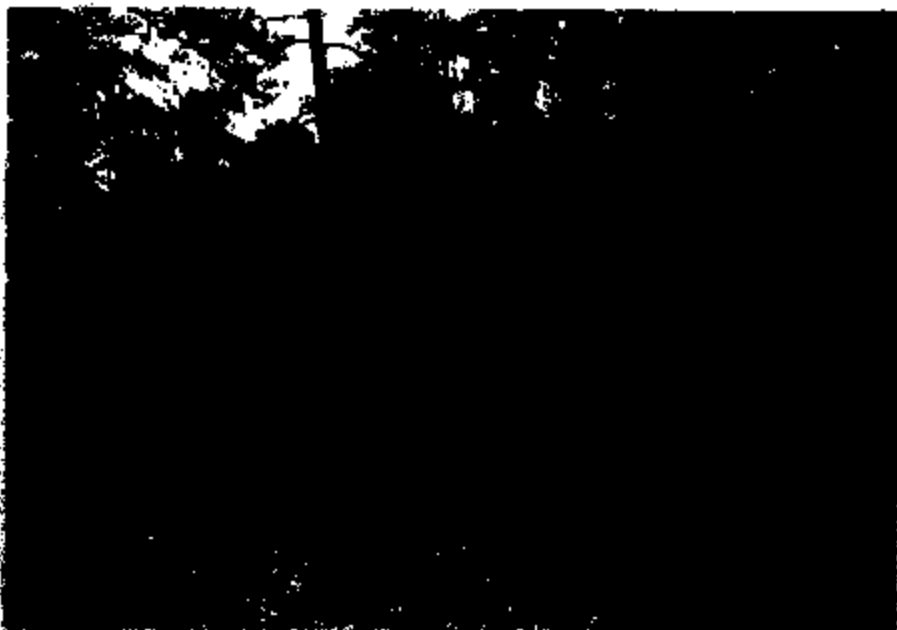


2002-025 31000

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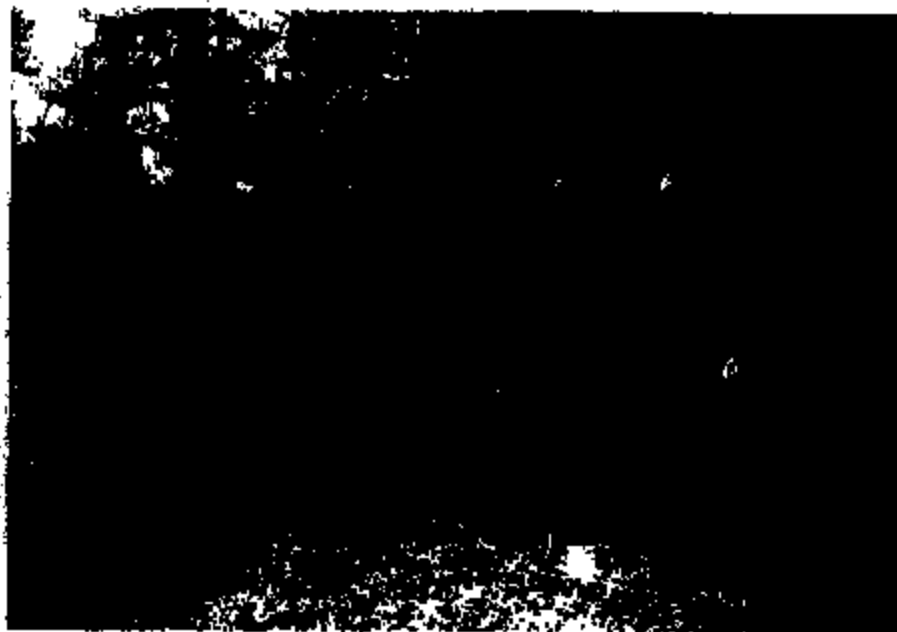
NO. 1

Front and end of dwelling shown from southeast corner.

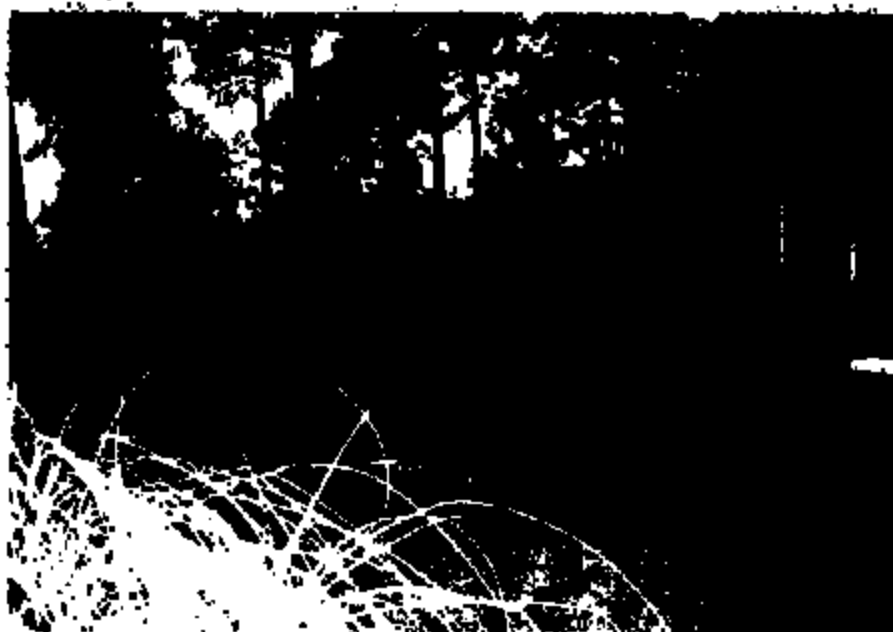


NO. 2

Rear view of dwelling shown from southwest corner.



**NO. 3**  
Rear of dwelling shown from northwest corner.



**NO. 4**  
Remains of dwelling and remains of the vehicle shown from the north end of the dwelling



NO. 5

Dwelling and vehicle shown from the front northeast corner.



NO. 6

Dining room shown from the foyer.



NO. 7

Living room which was being utilized as a game room shown from the foyer.



NO. 8

This shows the middle bedroom on the south end of the dwelling.



NO. 9  
Den area shown from the south.



NO. 10  
Master bedroom shown from the doorway.



NO. 11  
Den shown from the breakfast room.



NO. 12  
Kitchen shown from breakfast room. Arrow shows  
the Lincoln 4 door Sedan where the fire originated.



NO. 13

Utility room shown from the office door. The 1994  
Lincoln is visible in the center background.



NO. 14

Front wall of garage showing the vehicle where the fire originated.



**NO. 15**  
Garage shown from the north. Vehicle where the fire originated is visible in the left side of the photograph.



**NO. 16**  
Vehicle and garage shown after removal of debris in the garage.





NO. 17

Engine compartment shown from the front of the vehicle.



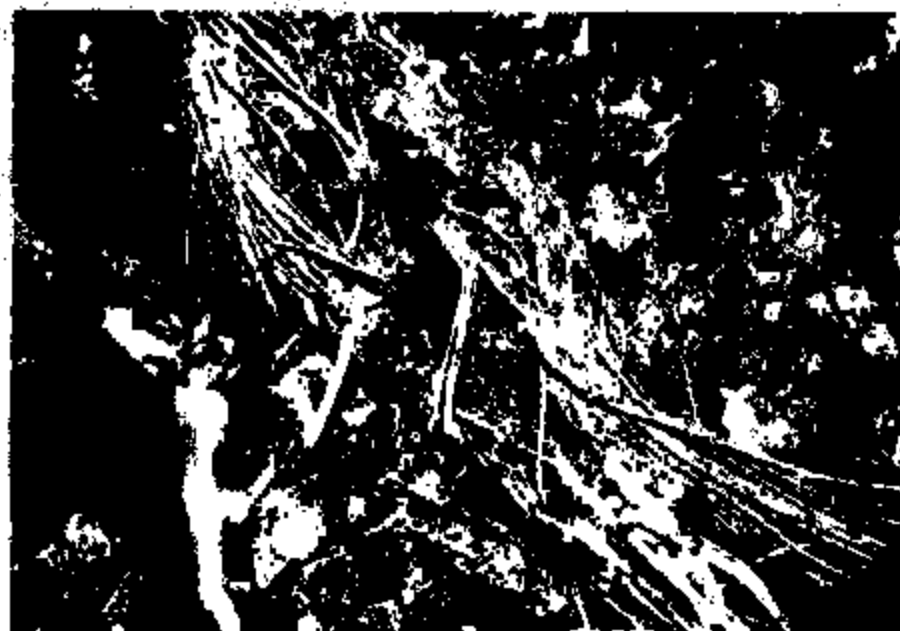
NO. 18

Dash and front seat area shown through windshield opening.



NO. 19

Close up view showing the wiring where the fire originated.



NO. 20

Close up view showing the fused and beaded wiring where the fire originated.



NO. 21

Overall view of the dash with the arrow showing the short circuit wiring on a contrasting background.



NO. 22

Top view of dash area with short circuit wiring on a contrasting background.



NO. 23

Close up view showing the fused and beaded electrical wiring on a contrasting background.



NO. 24

This is the fused and beaded electrical wiring where the short circuit occurred.



NO. 25

Close up view showing the short circuit wiring where the fire originated.



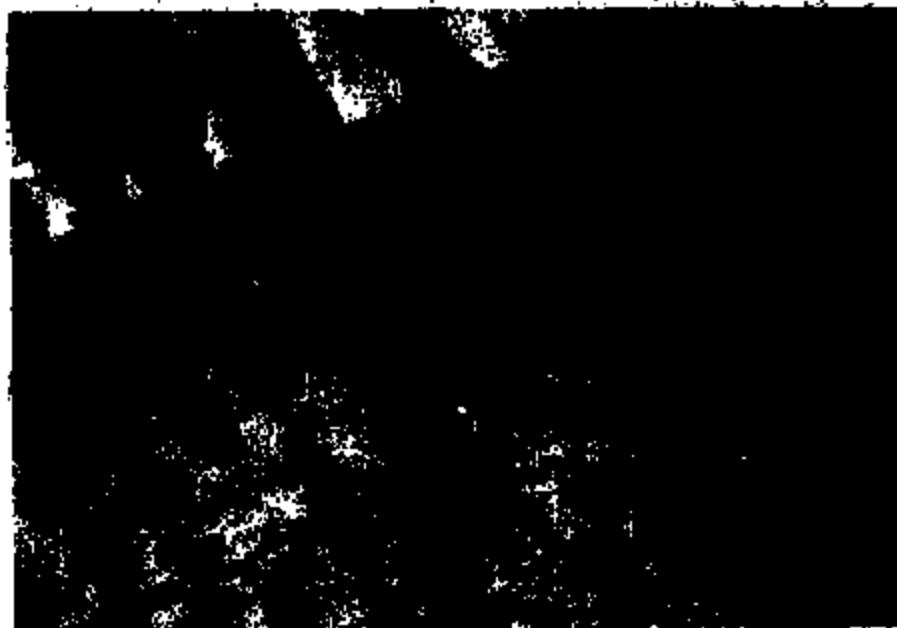
NO. 26

Close up view showing the copper beads and the fused and beaded wiring.



NO. 27

Close up view showing the fused and beaded electrical wiring on a contrasting background.

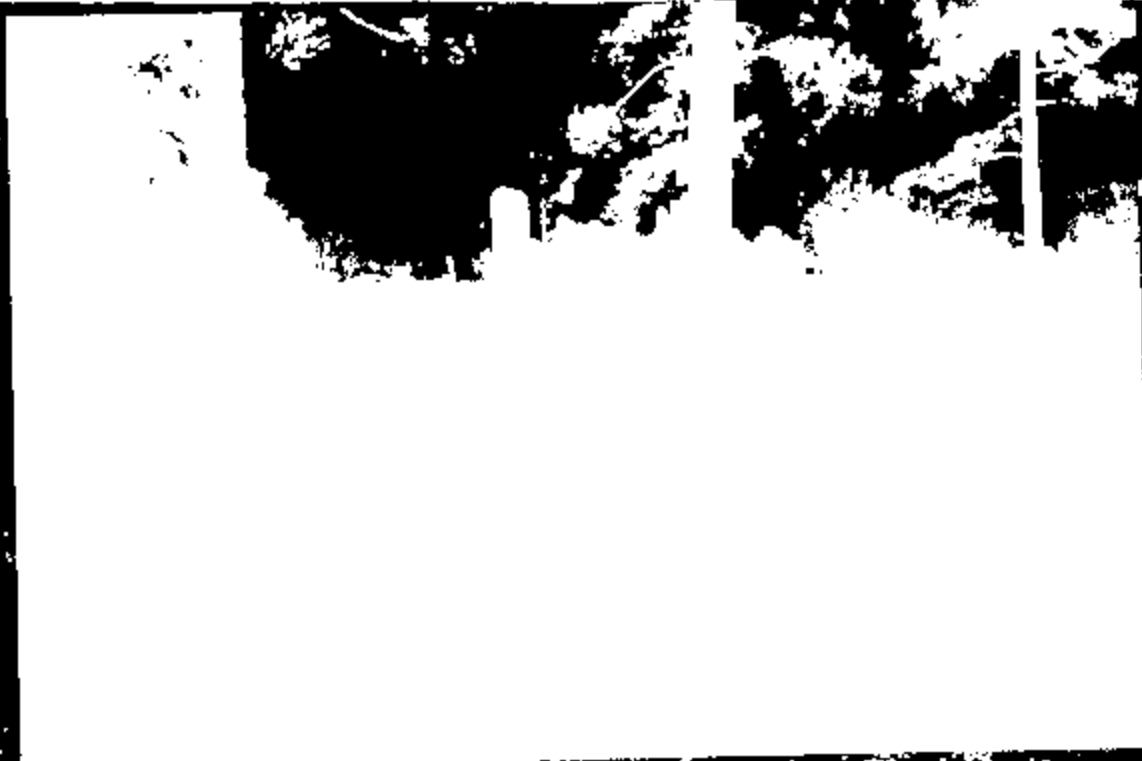


NO. 28

Close up view showing the fused and beaded electrical wiring on a contrasting background.

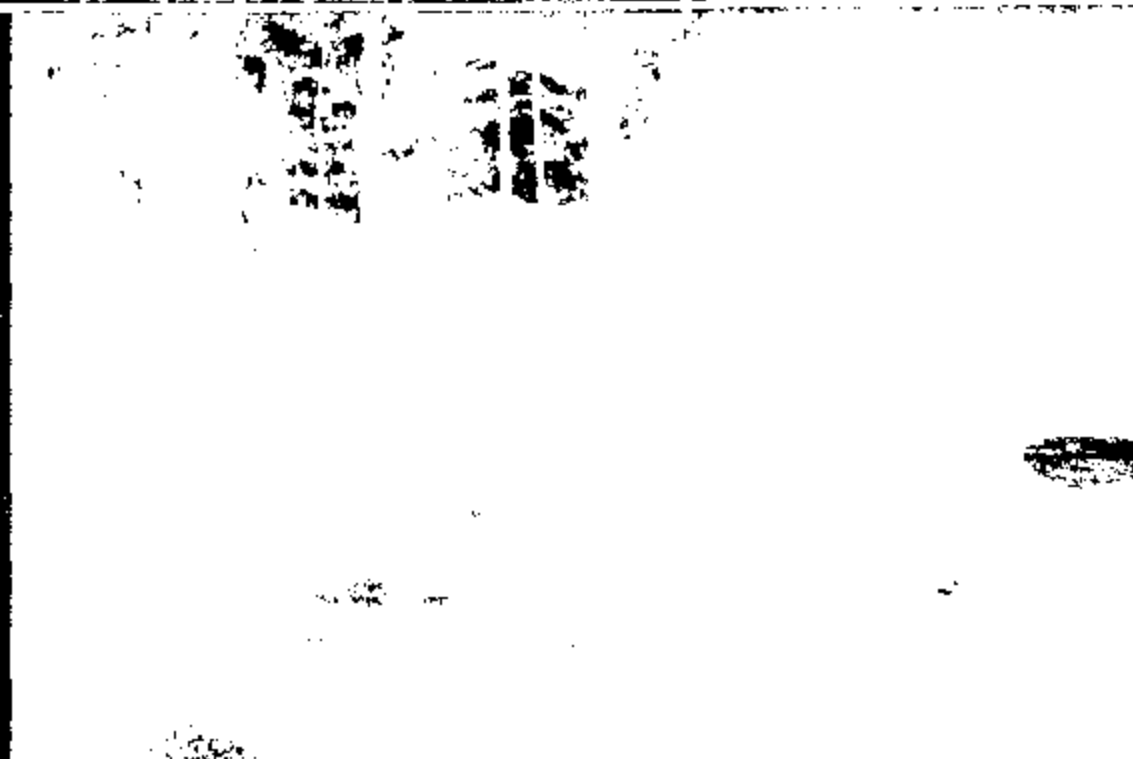
# CLAIM PHOTO TRANSMITTAL

13-2075-171



Scene Location View

Scene Location View



Scene Location View

2nd of 23K

Scene Location View

Claim Entry By

Vehicle Photos

Vehicle Owner

Date 1-27-58

Is this the Insured Vehicle



or Claimant Vehicle



Please indicate  
Vehicle Photos taken

8782-825 31876

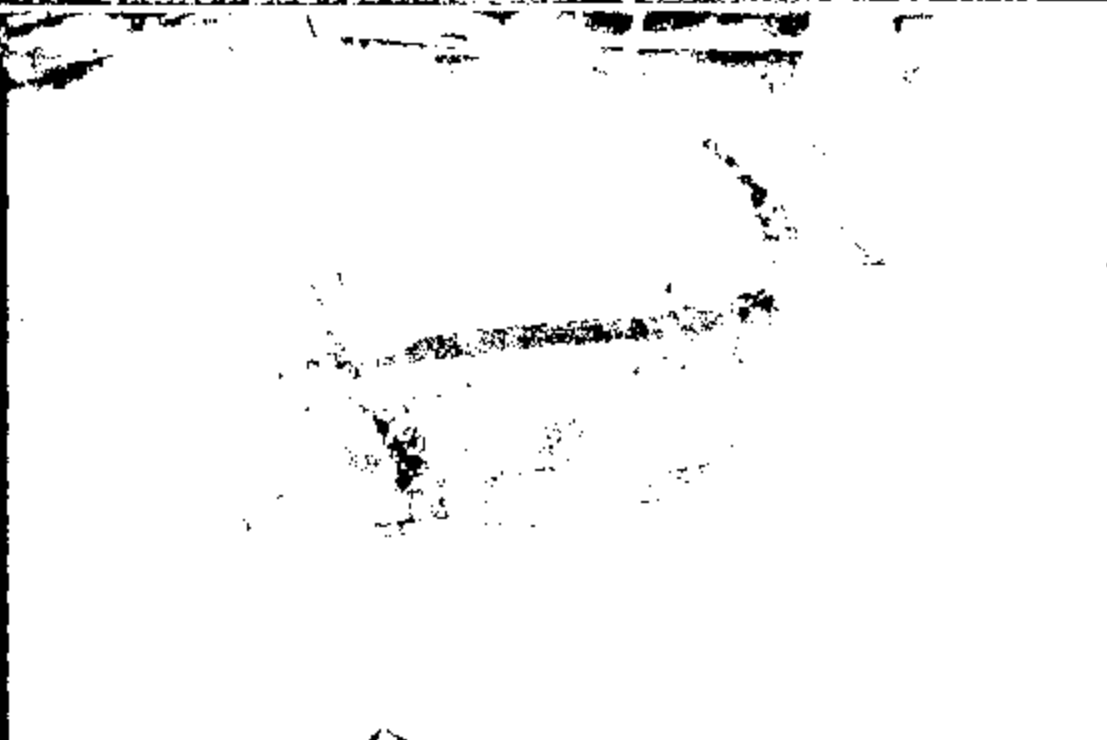
# CLAIM PHOTO TRANSMITTAL

Claim  
Number



Scene Location View

Scene Location View



Scene Location View

Scene Location View

Vehicle Taken By

Time Taken

Cost

If Vehicle Photos

Yr. & Month

Vehicle Owner

Place where  
Vehicle Photos taken

Is this the Insured Vehicle ☐ or Claimed Vehicle ☐

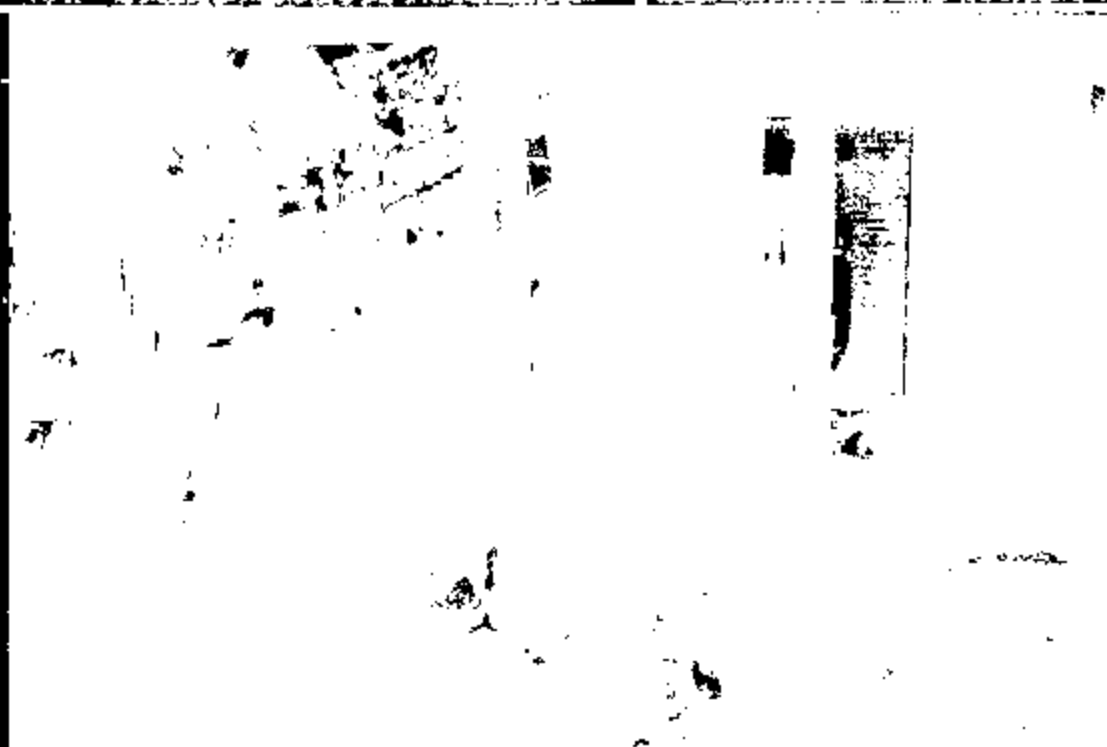


## CLAIM PHOTO TRANSMITTAL

Claim  
Number

Scene Location/View

Scene Location/View



Scene Location/View

Family Area

Scene Location/View

Photo Taken By

Ken [Signature]

Time Taken

Date

If Vehicle Present

Vehicle Color

Yr. &amp; Model

Is this the injured vehicle

☐

or Claimant Vehicle

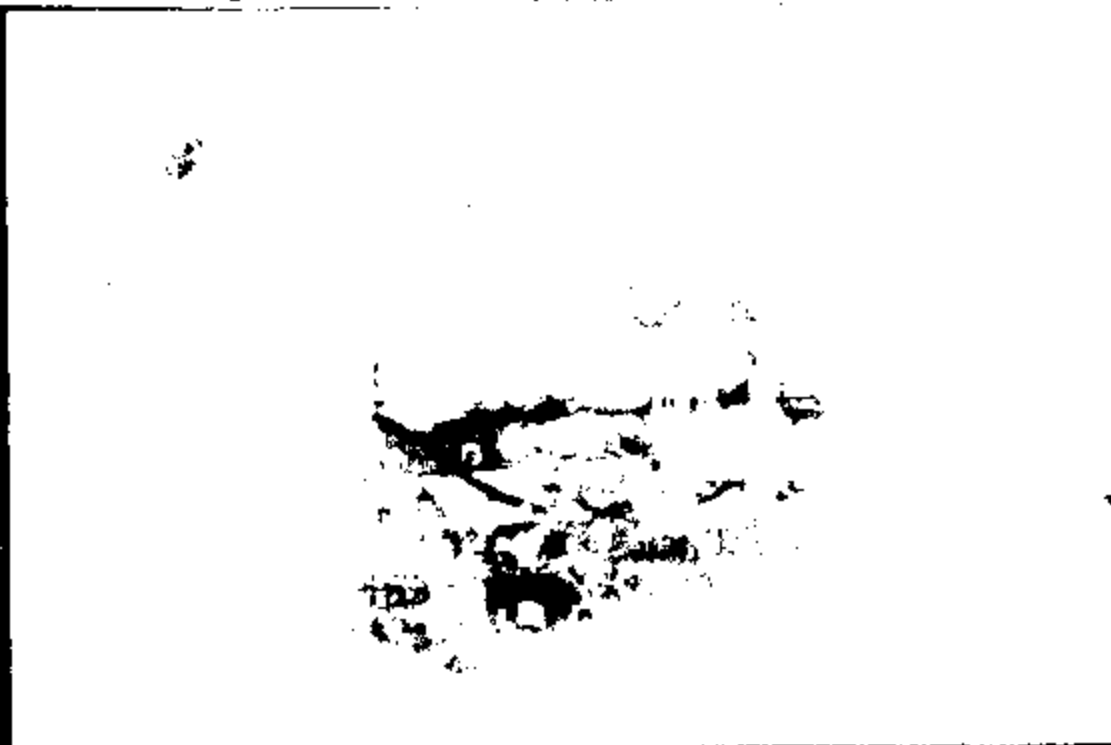
☐

Place where

Vehicle Photos taken

2002-025 31678

# CLAIM PHOTO TRANSMITTAL



Scene Location View

Scene Location View



Scene Location View

Scene Location View

Photo Taken By

Time Taken

Date

Vehicle Make

Vehicle Model

Vehicle Color

Is this the Insured Vehicle

☐

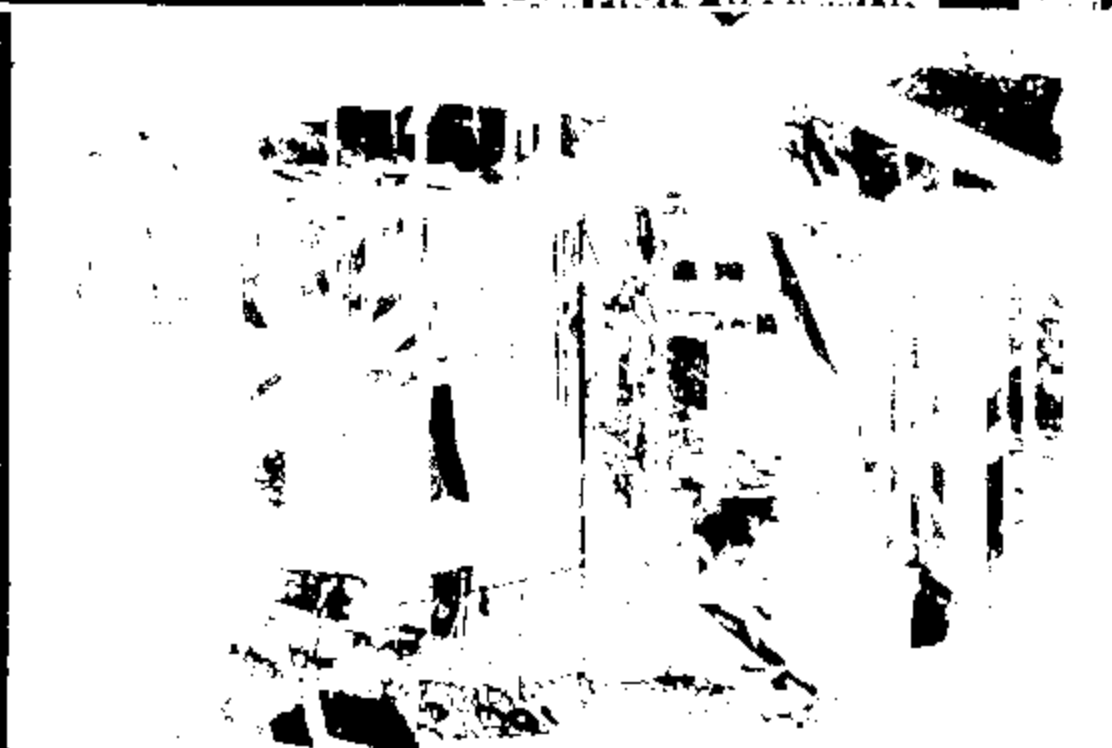
or Claimant Vehicle

☐

Please attach Vehicle Photos when

EP02-025 31877

# CLAIM PHOTO TRANSMITTAL



Name Location View

Name Location View



Name Location View

Kitchen Area

Name Location View

Name Title Co.

Name Title

Date

If Vehicle Present

Vr. & Model

Vehicle Color

Is this the Insured Vehicle ☐

or Claimed Vehicle ☐

Please attach  
Vehicle Photos taken

180-2-72, Rev. 7-88 Printed in U.S.A.

ER02-025 31075

# CLAIM PHOTO TRANSMITTAL



Scene Location/View



Scene Location/View

*Downing Road*

Scene Location/View

Claim Title/Ref

Time Taken

Date

Vehicle Photos  
Vehicle Color

Yr. & Model

Is this the Insured Vehicle ☐

or Claimed Vehicle ☐

Please attach  
Vehicle Photos to this

5002-025 31670

# CLAIM PHOTO TRANSMITTAL



Scene Location/View

Scene Location/View



Scene Location/View

Scene Location/View

Police Ticket No.

Time Taken

City

Is Vehicle Photos

Yr. & Model

Vehicle Owner

Is this the Insured Vehicle ☐ or Claimant Vehicle ☐ Place where Vehicle Photos taken

5002-025 31000

# CLAIM PHOTO TRANSMITTAL

Case  
Number



Scene Location/View

BL 1

Scene Location/View



Scene Location/View

BL 1

Scene Location/View

Picture Taken By

Time Taken

Date

If Vehicle Photos

Yr. & Model

Vehicle Color

Is this the Intended Vehicle

☐

or Other than Vehicle

☐

Please indicate  
Vehicle Photos taken

ERG2-825 31551

# CLAIM PHOTO TRANSMITTAL

Claim  
File #



Scene Location/View

Scene Location/View



Scene Location/View

Scene Location/View

Picture Taken By  
If Vehicle Present  
Vehicle Owner

Time Taken  
Yr. & Month

Date

Is this the Insured Vehicle ☐ or Other Vehicle ☐ Place where  
Vehicle Photo Taken

0962-628 31682

# CLAIM PHOTO TRANSMITTAL

Date  
Time



Scene Location/View

Scene Location/View

Scene Location/View

Scene Location/View

Photo Taken By

Time Taken

Date

If Vehicle Photos

Yr. & Model

Vehicle Owner

Is this the Insured Vehicle

or Claimant Vehicle

Place where  
Vehicle Photos taken

ENR2-025 31883



**HANNAH, COLVIN & PIPES, L.L.P.**

ATTORNEYS AT LAW  
2051 SILVERSIDE DRIVE, SUITE 200  
BATON ROUGE, LOUISIANA 70808  
TELEPHONE: (225) 766-8240  
FACSIMILE: (225) 766-5546  
E-mail: hcp@hannaf.com

MICHAEL P. COLVIN  
W. HANSON PIPES  
WILLIAM J. MITCHELL, II

ISABEL HANNAH  
(225) - 7595

December 30, 1999

VIA CERTIFIED MAIL  
Z 188 056 747

Mr. Jessie Hollingsworth  
Product Claims Department  
Ford Motor Company  
Parklane Tower West, Suite 400  
3 Parklane Blvd.  
Dearborn, Michigan 48126

Re: State Farm (Fire) Claim No.:  
State Farm (Auto) Claim No.:  
Insureds:  
Date of Loss:  
Claimant:  
Our File No.:

[REDACTED]  
January 27, 1999  
Ford Motor Company  
821-1923

Dear Mr. Hollingsworth:

Please be advised that I have been retained by State Farm Fire & Casualty Company and State Farm Mutual Automobile Insurance Company, in connection with damages sustained as a result of a fire which occurred on January [REDACTED] in Deville, Louisiana. As a result of the fire, a 1994 Lincoln Town Car and the residential dwelling owned by State Farms' insureds [REDACTED], sustained substantial property damage totaling approximately \$177,010.86.

According to our expert's report, the fire originated in the 1994 Lincoln Town Car that was parked inside the garage of the above mentioned residential dwelling. The fire was caused by a defect in the electrical wiring which resulted in a short-circuit and ignition of nearby combustibles.

Enclosed is a copy of our report with attached photographs and a copy of invoices and checks issued by State Farm Fire & Casualty Company and State Farm Mutual Automobile Insurance Company, payable to or on behalf of their insureds [REDACTED] and [REDACTED]. As you will note, State Farm Fire paid its insured a total of \$163,315.86 for the damage to the [REDACTED] residence and State Farm Auto paid its insured a total of \$13,594.00 for the damage to the [REDACTED] 1994 Lincoln Town Car. In addition [REDACTED] and [REDACTED] suffered a loss in the form of a deductible in the amount of \$100.00. State Farm Fire & Casualty Company and State Farm Mutual Automobile Insurance Company are looking to Ford Motor Company for full reimbursement of this claim totaling \$177,010.86.

EP22-025 31084

Mr. Jessie Hollingsworth  
Products Claims Department  
Ford Motor Company  
December 30, 1999  
Page 2

Please note that this claim prescribes on January 27, 1999. Therefore, I would appreciate your calling me immediately upon receipt of this letter to discuss this matter. If I do not hear from you within the next fifteen (15) days, I will be forced to file legal proceedings against Ford Motor Company, on behalf of my clients, State Farm Fire & Casualty Company and State Farm Mutual Automobile Insurance Company.

I look forward to hearing from you soon.

With kind personal regards, I remain

Sincerely,

HANNAH, COLVIN & PIPES

*W. Ransom Pipes / ff*  
W. Ransom Pipes

Enclosure  
WRP/ff

cc: Barbara Smith  
Lia Chain

8002-825 31885

Dennis Investigation

1617 GOLDEN ROAD • TYLER, TX 75701 • (903) 592-6900

FD-202-625 31855

**Death Investigation**

**RECEIVED**

**REPORT NUMBER: ONE**

**DATE: FEBRUARY 18, 1999**

**FEB 22 1999  
ALEX FIRE CLAIMS**

**PREPARED FOR: STATE FARM INSURANCE CO.  
P. O. BOX 12070  
ALEXANDRIA, LA 71315**

**ATTENTION: MR. Keri Landry**

**INSURED:**

**LOSS LOCATION:**

**DEVILLE, LOUISIANA**

**DATE OF LOSS:**

**WEDNESDAY, JANUARY 27, 1999  
AT APPROXIMATELY 2:30 A.M.**

**POLICY NUMBER:**

**CLAIM NUMBER:**

**182035171**

**FILE NUMBER:**

**99-JAN-3039**

**PRIVILEGED AND CONFIDENTIAL**

**1617 GOLDEN ROAD • TYLER, TX 75701 • (903) 592-6900**

**8062-825 31897**

FEBRUARY 18, 1999

99-JAN-3039

INSURED: [REDACTED]

### ASSIGNMENT

The assignment was received Wednesday, January 27, 1999, from Mr. Karl Landry, with instructions to conduct an Origin and Cause Fire Investigation. The fire occurred Wednesday, January 27, 1999, at approximately 2:30 P.M. The investigation into the origin and cause of this fire was commenced Friday, January 29, 1999.

### DESCRIPTION OF INSURED PROPERTY

The dwelling was a one story, owner occupied, brick veneer construction. It was built on a concrete slab foundation with a composition shingle roof. This house was heated and air conditioned with a central electric unit. The electricity to the all electric house was connected and operational at the time the fire occurred. This dwelling was in good condition before the fire occurred. It was built in 1974 and is located near Deville, Louisiana. Fire protection for the area is from the Deville Volunteer Fire Department with the Holiday Village sub-station being the closest.

### DESCRIPTION OF VEHICLE

The vehicle which was also destroyed in the fire was a 1994 Lincoln 4 door Sedan with Louisiana license plate number [REDACTED]. It was powered with a V8 engine and automatic transmission. The vehicle was purchased as a program car with approximately 19,000 miles and at the time of the fire, it had approximately 80,000 miles.

### FIRE SCENE EXAMINATION

A fire scene was conducted Friday, January 29, 1999, starting at 9:00 A.M. The scene was photographed, measured and a field diagram was drawn. The scene had not received significant alterations since the

FEBRUARY 12, 1999

99-JAN-3039

INSURED: [REDACTED]

occurrence of the fire, therefore enabling an accurate fire cause determination. A survey of the perimeter did not show any evidence of an explosion in connection with this fire. [REDACTED] was at home when the fire occurred and there was no forced entry prior to or during the fire. A survey of the damage revealed the garage had been totally gutted by the fire and the roof was burned off. The entire dwelling including the attic received very extensive fire destruction. A 1994 Lincoln 4 door Sedan which was parked in the garage, also received what would be considered total fire destruction.

A visual inventory of the contents indicated there was an average amount located in this dwelling. These contents appeared to have been of good quality and in good condition before the fire occurred. The contents within the north end of the dwelling received near total destruction from the fire and the heat. The contents which were located within the south end of the dwelling received very extensive destruction from the fire, heat and smoke.

A study was undertaken to establish the origin and cause of this fire. A comparative analysis of the heat and burn pattern revealed a zone of concentrated burning within the garage. This is the location where the fire had been burning for the longest period of time. It was further verified by [REDACTED] that this was the location of the fire at the time of discovery. Closer examination revealed that the deepest sooted burning was in the vehicle which was parked in the garage. The thermal discoloration and distortion to the vehicle indicate the fire had originated within the vehicle and had extended to the garage area. The engine compartment, passenger compartment and trunk area were examined. It was established that the fire had originated within the passenger compartment and had extended to the engine compartment and trunk area. The electrical wiring throughout this Lincoln 4 door Sedan was closely examined. The electrical wiring within the center portion of the dash was fused and beaded. There were numerous copper beads recovered from this area. These conditions are consistent with results of an electrical short circuit or an electrical malfunction. It is my professional opinion, that an electrical short circuit occurred within one of the

FEBRUARY 12, 1999

INSURED: [REDACTED]

99-JAN-3039

wiring harnesses near the center of the dash. The insulation on the wiring and the surrounding combustible materials were ignited by the heat and sparks from the short circuit. The ensuing fire traveled throughout the passenger compartment, entered the engine compartment and trunk area causing what would be considered total fire destruction to this vehicle. This fire scene examination and investigation did not establish any other reasonable cause for this fire. There was no evidence whatsoever, which would indicate the cause of the fire was incendiary in nature.

#### SUMMARY REPORT OF INVESTIGATION

It was learned in an interview with [REDACTED] that she discovered the fire at approximately 2:00 A.M., Wednesday, January 27, 1999. She was sleeping in the master bedroom when she heard popping and heard the doorbell ringing. She turned on all the lights from her bedroom to the utility room on the opposite end of the dwelling. She went to the utility room door which opens into the garage. When she opened the door, there was a wall of flames coming up from the Lincoln 4 door Sedan. She ran to her neighbors house and asked them to call 9-1-1. She went back to her dwelling and her Lincoln 4 Door Sedan was totally on fire and the flames were rolling up across the ceiling coming out through the garage door. The Deville Volunteer Fire Department responded to the alarm. By the time they could control and extinguish the fire the vehicle had received total fire destruction. The garage was totally destroyed and the fire had extended throughout the majority of the dwelling. By that time, the majority of the roof had been consumed by the blaze.

#### CONCLUSION

In conclusion, it is my professional opinion this fire originated within this 1994 Lincoln 4 Door Sedan. The fire was caused by an electrical short circuit or malfunction in the wiring harness near the center of the dash. This fire scene examination and investigation did not establish any other reasonable cause for this fire.

FEBRUARY 18, 1999

99-JAN-3639

INSURED: [REDACTED]

**COMMENTS**

I recommend that this report be evaluated by your subrogation department.

If you should need additional assistance regarding this matter, please do not hesitate to call.

Sincerely,

Bob Dennis  
DENNIS INVESTIGATIONS

BD/hr



# State Farm Insurance Companies



August 2, 1999

*Rec'd  
4/4/803  
J.H.*



State Farm Insurance Claim Office  
2141 N. Main Drive  
Alhambra, Louisiana 71215  
Phone: 484-4300

Howard Keyes  
Ford Motor Credit  
3 Parklane Blvd  
Dearborn, MI 48126

RE: Claim Number: 18-0161-649  
Date of Loss: January 27, 1999  
Our Insured: [REDACTED]

Dear Mr. Keyes:

The identified vehicle, 1994 Lincoln Town Car, VIN #1LNLM82W9RY676183, is insured by State Farm Automobile Insurance Co. This vehicle experienced a fire. State Farm would like to give you an opportunity to inspect the vehicle in advance notice of our potential subrogation claim.

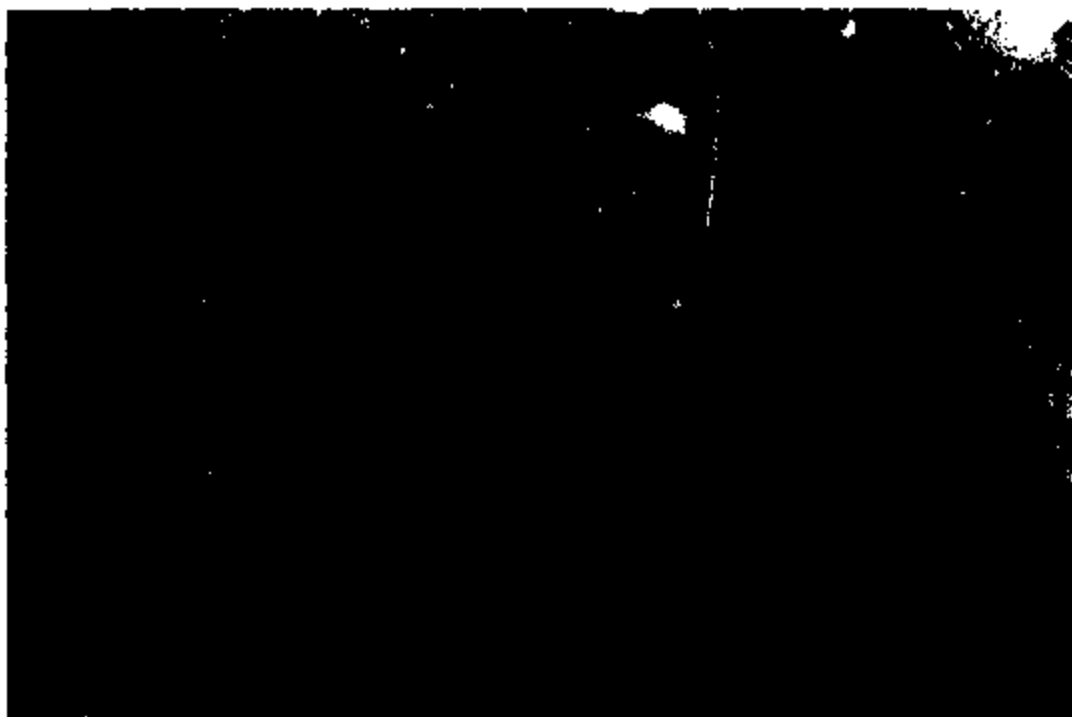
Please contact me at 318-484-4311 to set up a time for your inspection.

Sincerely,

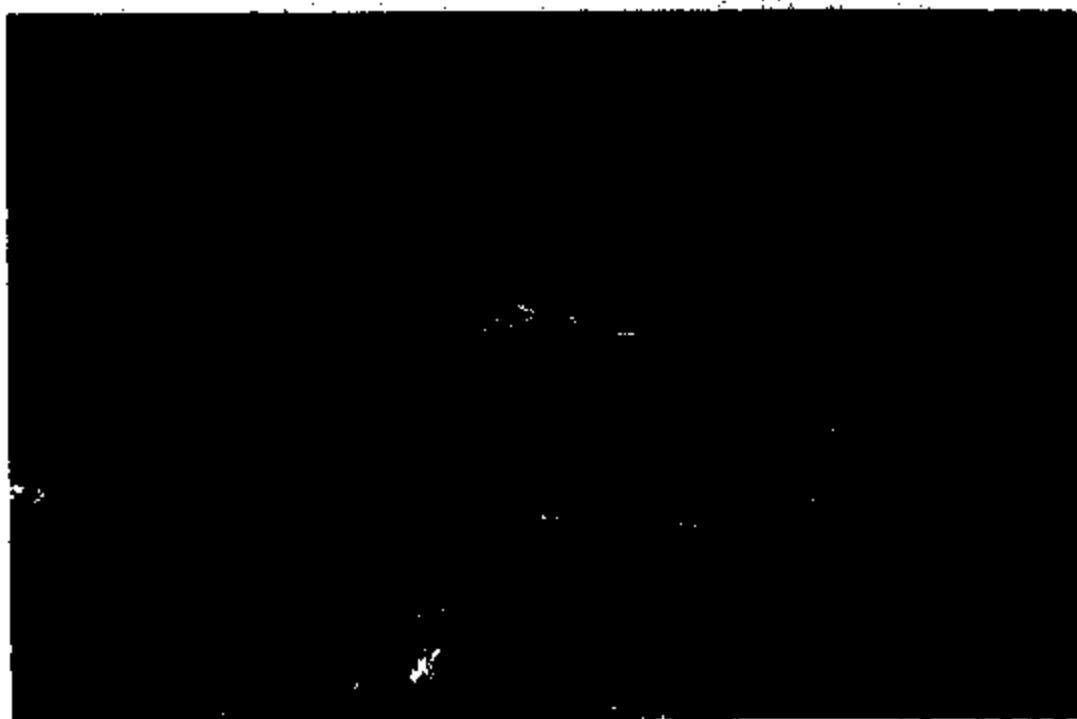
*Marcia M. Corvillion*  
Marcia Corvillion  
Claim Representative  
(318) 484-4311

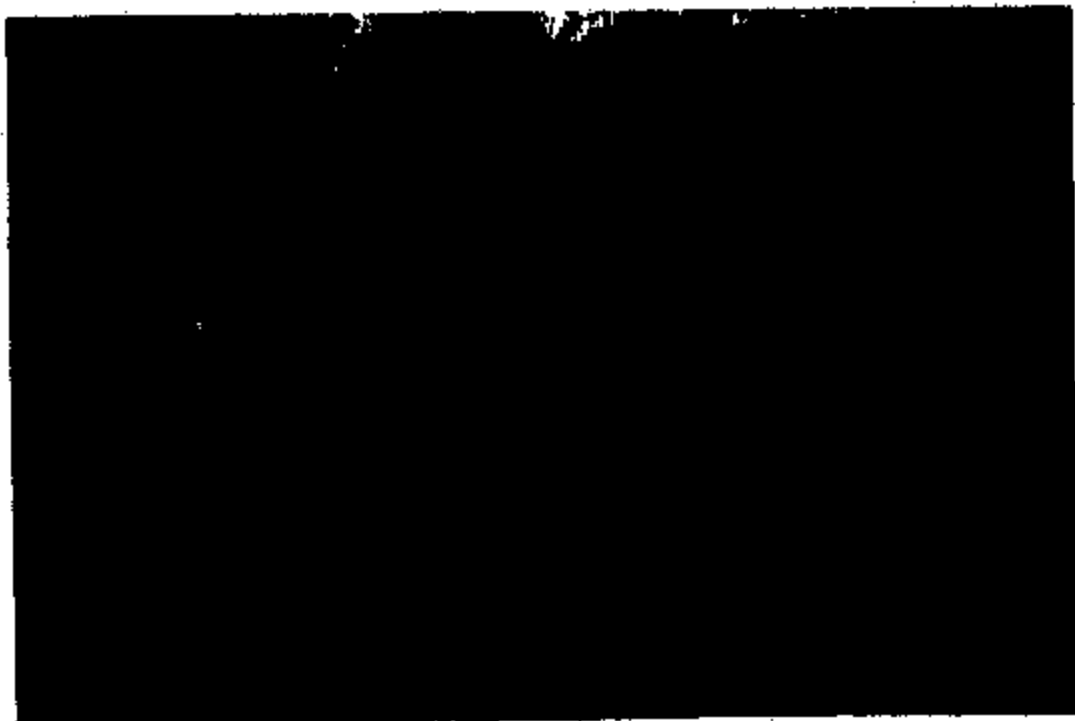
State Farm Mutual Automobile Insurance Company

P.S. To expedite service, please use the above claim number in all written and oral correspondence.

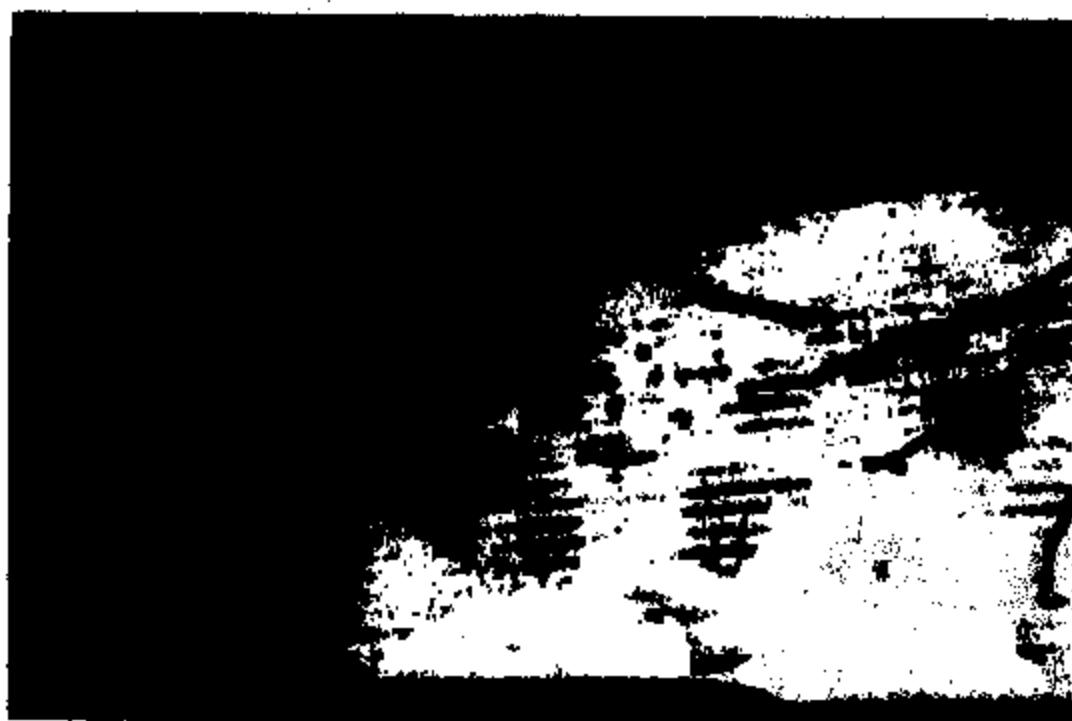


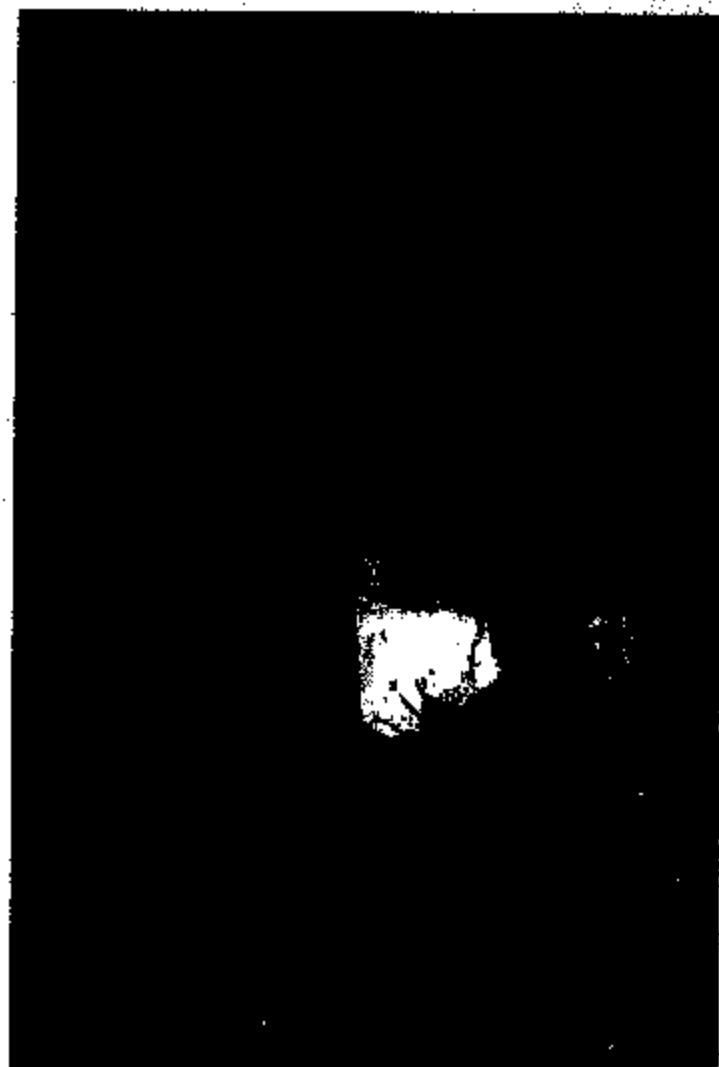
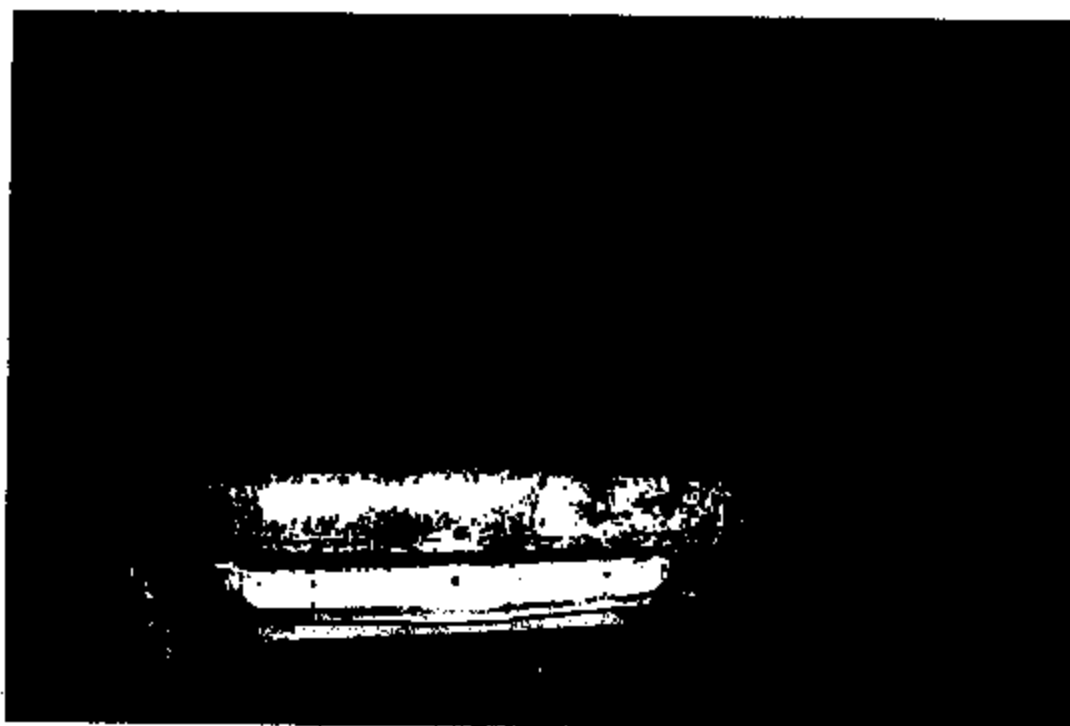








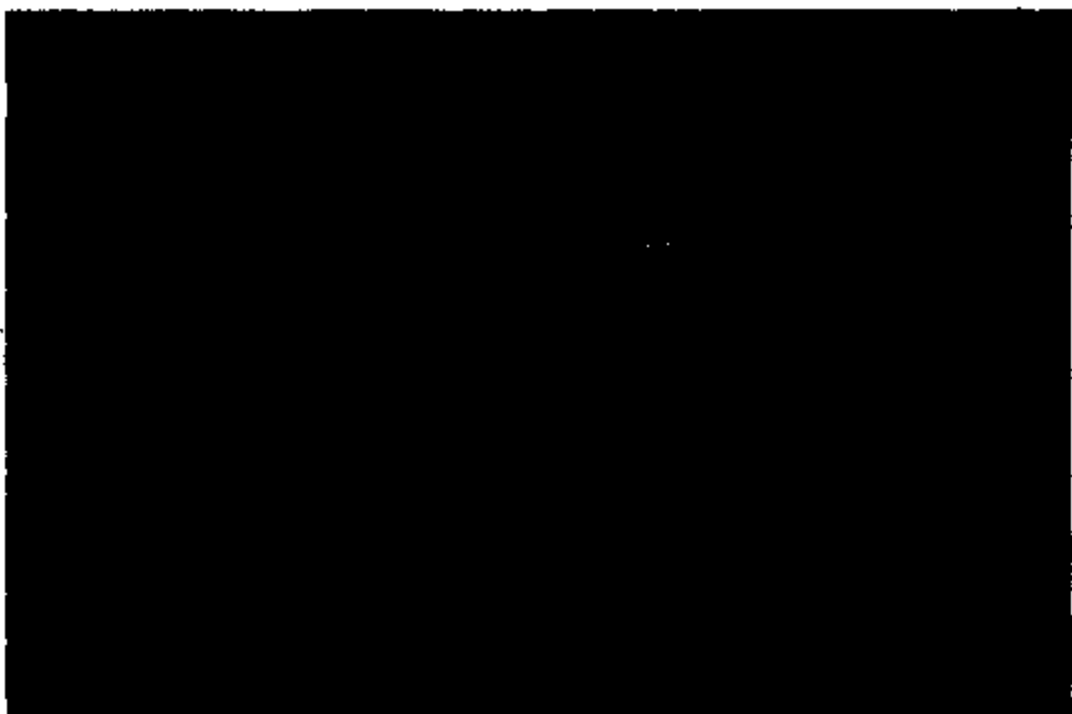


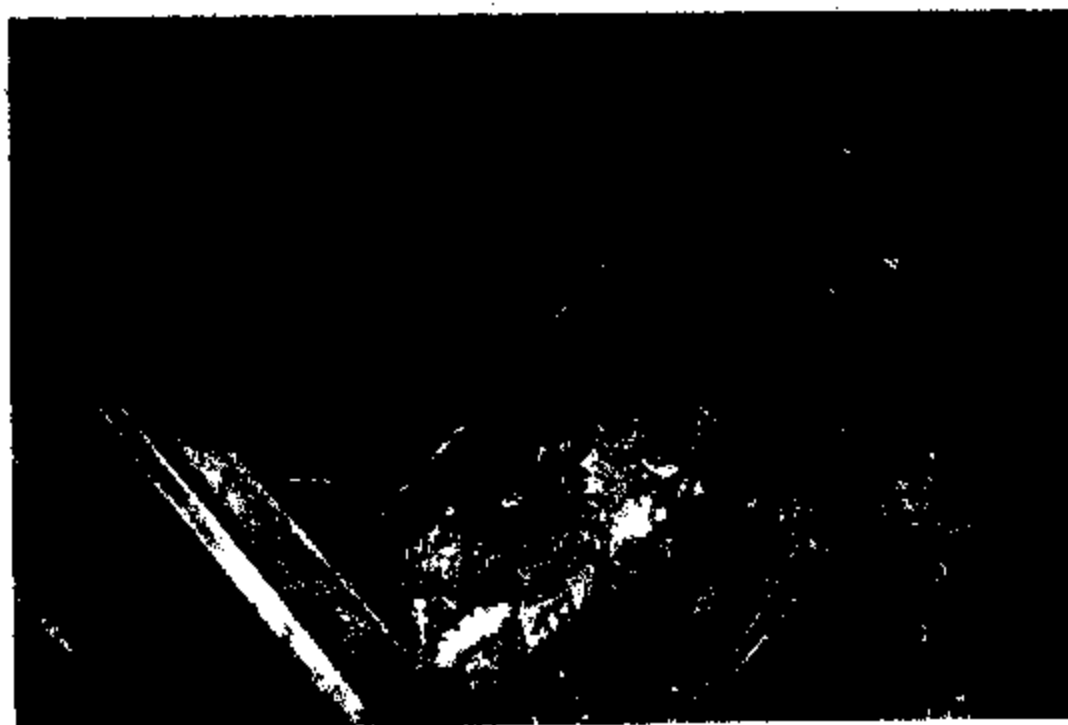
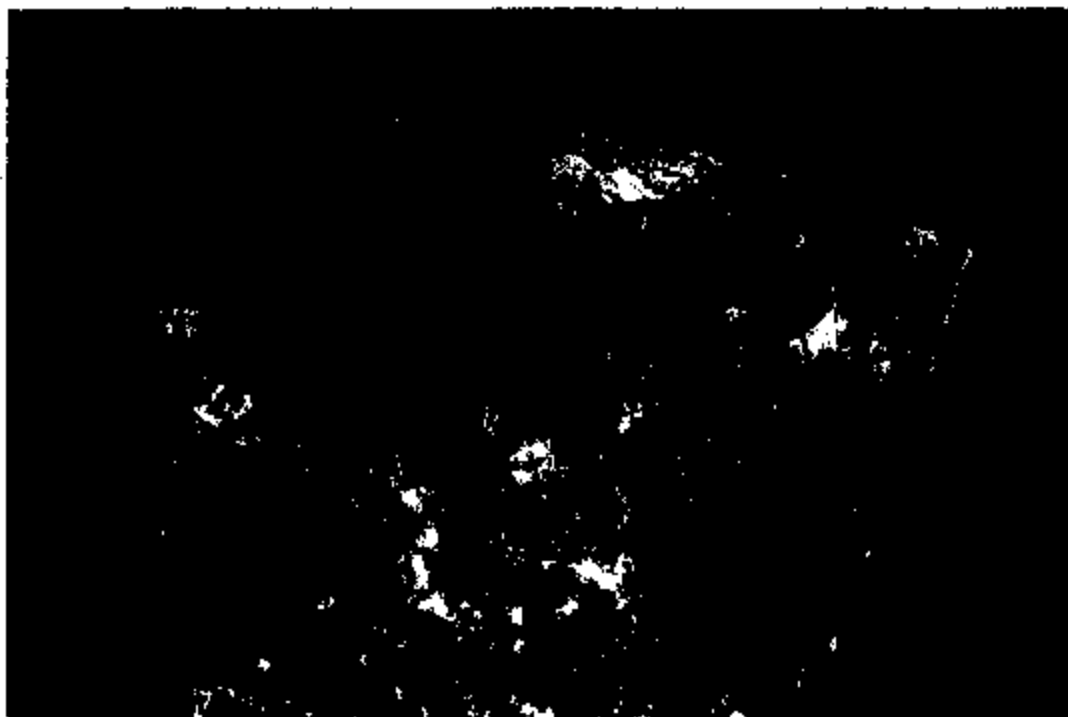


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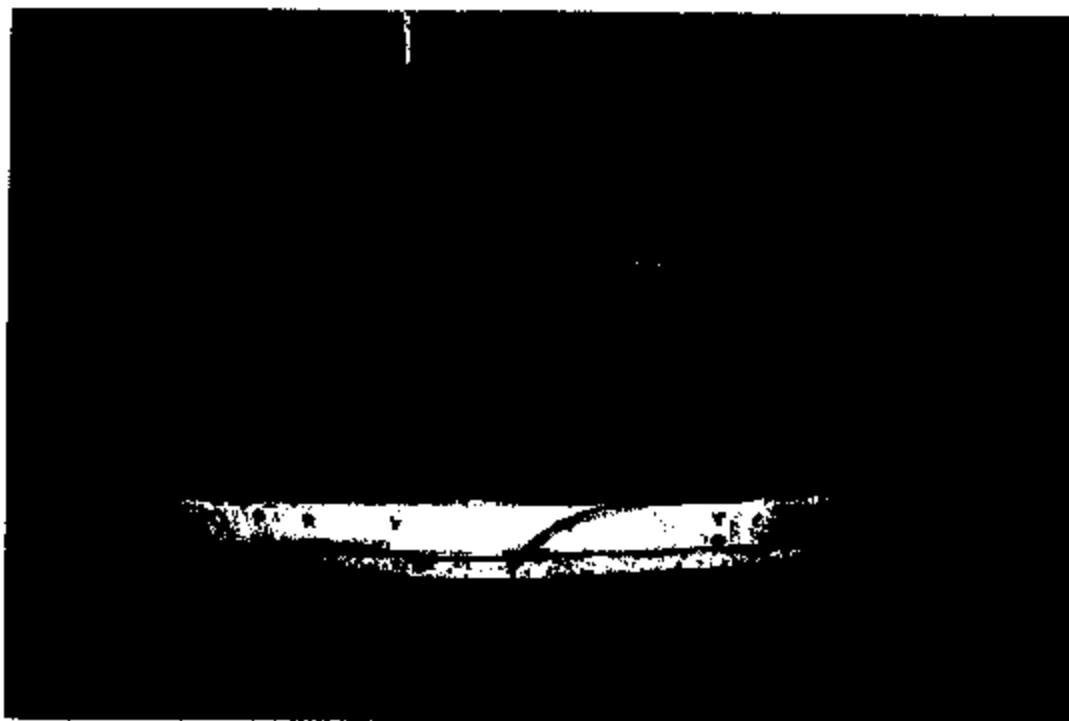












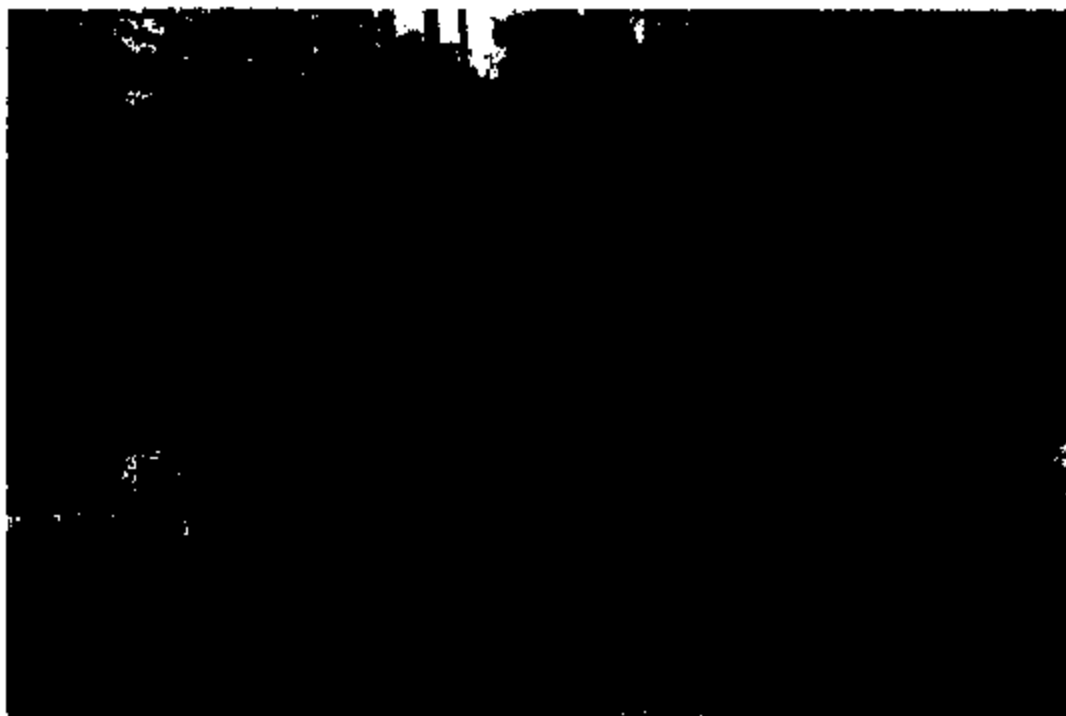
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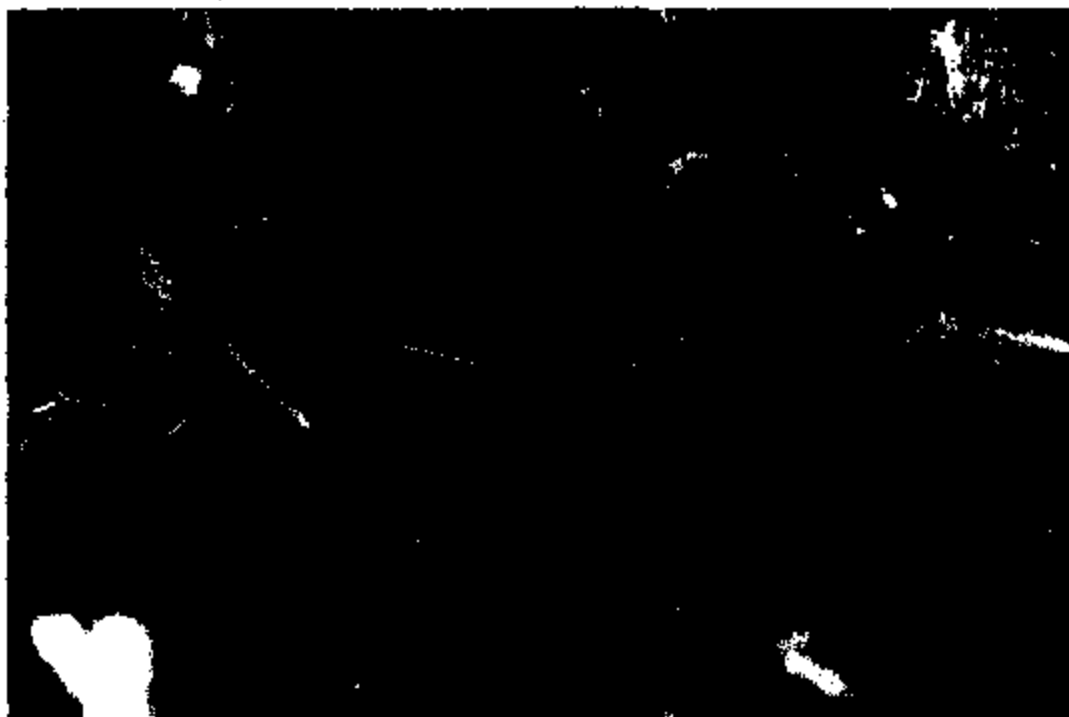


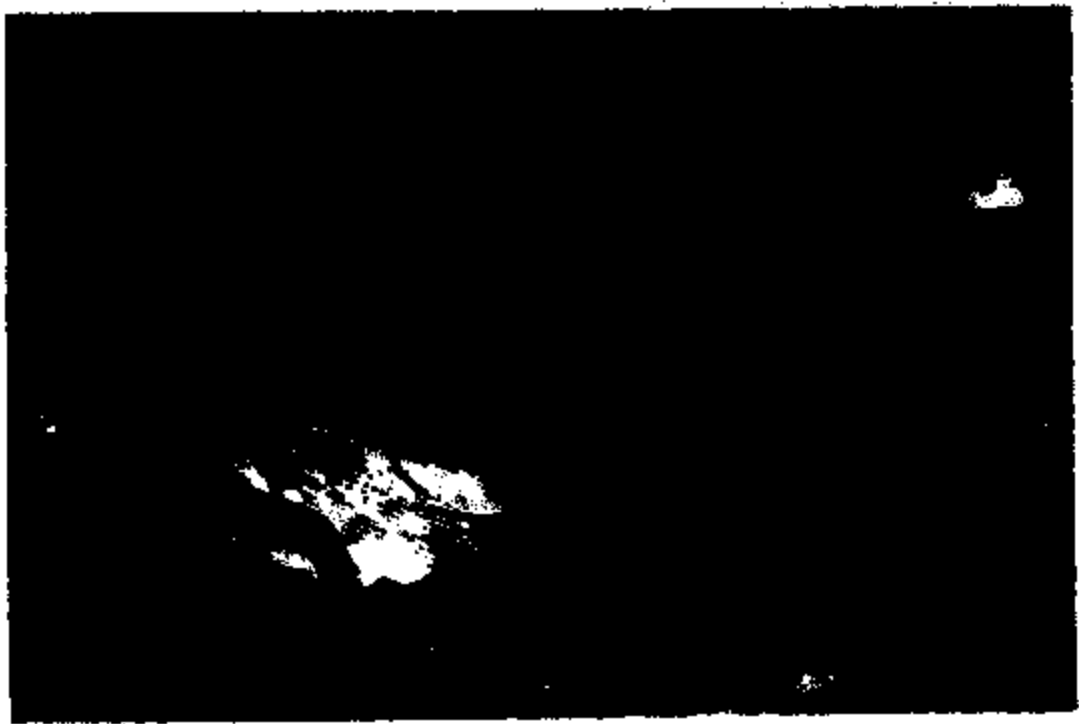




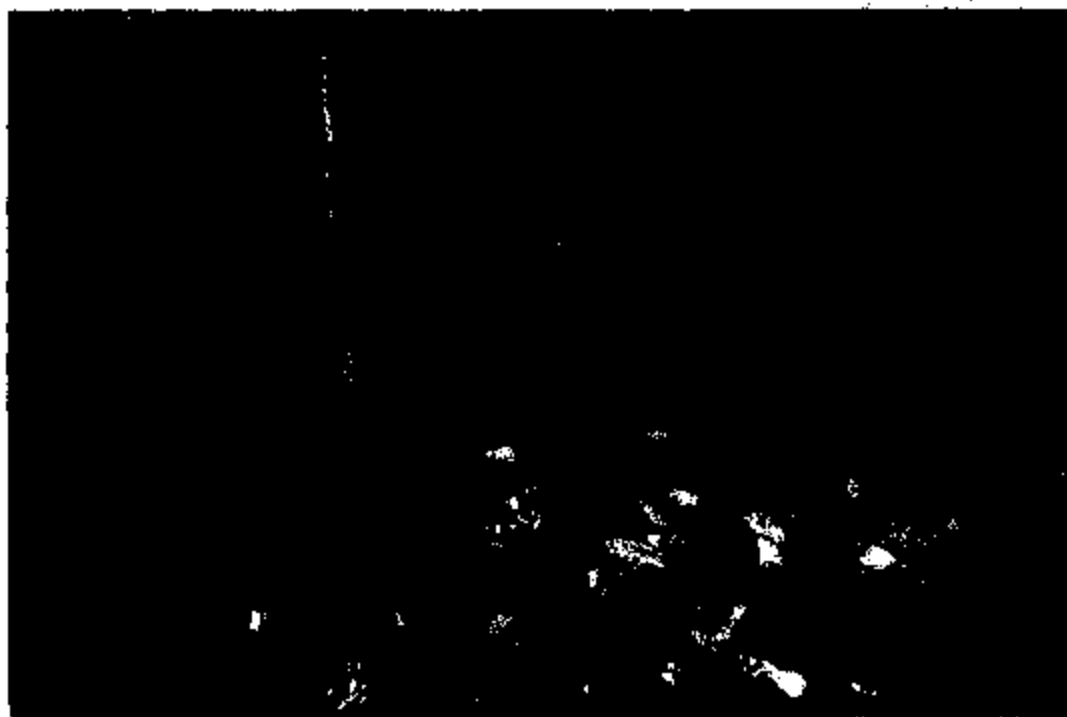


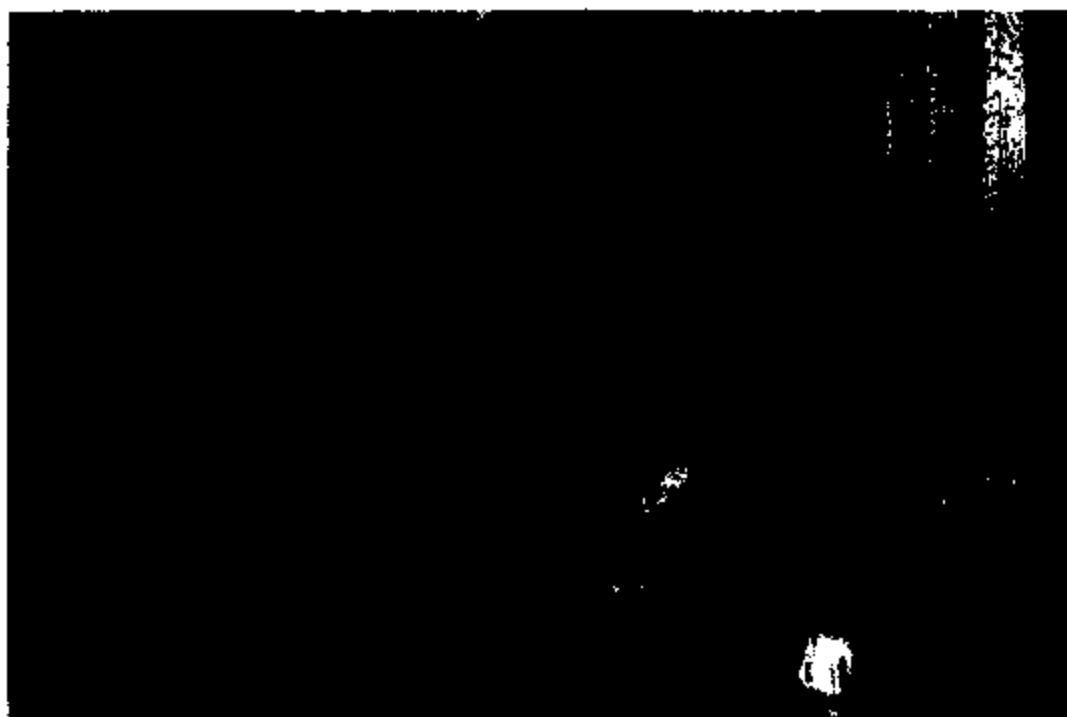




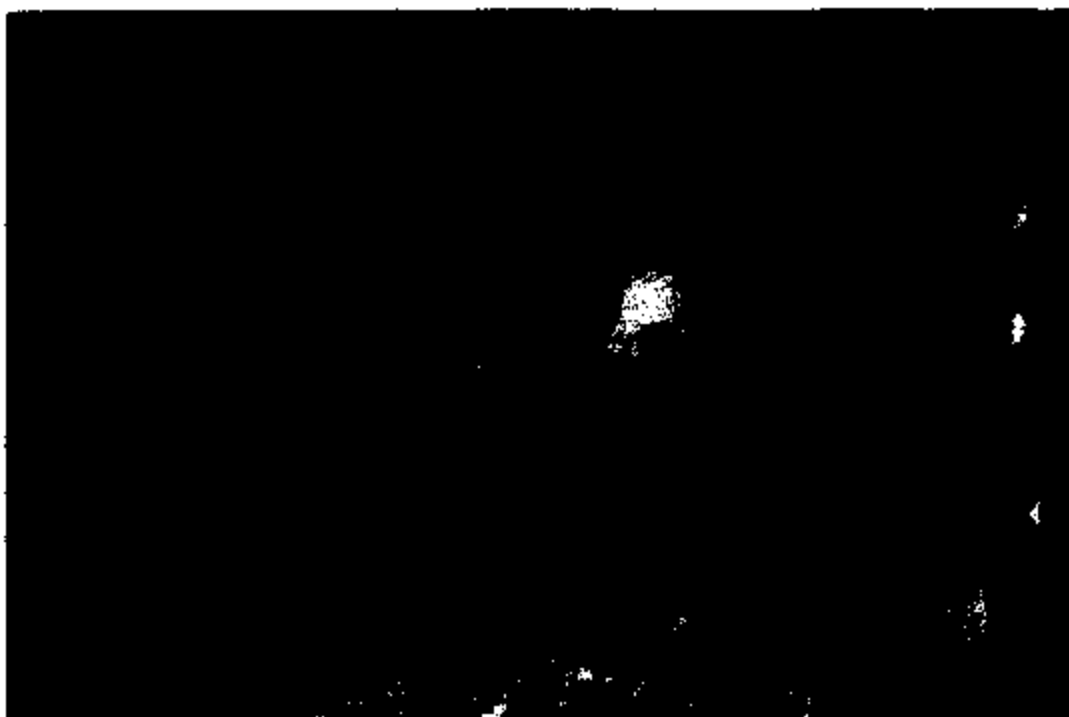






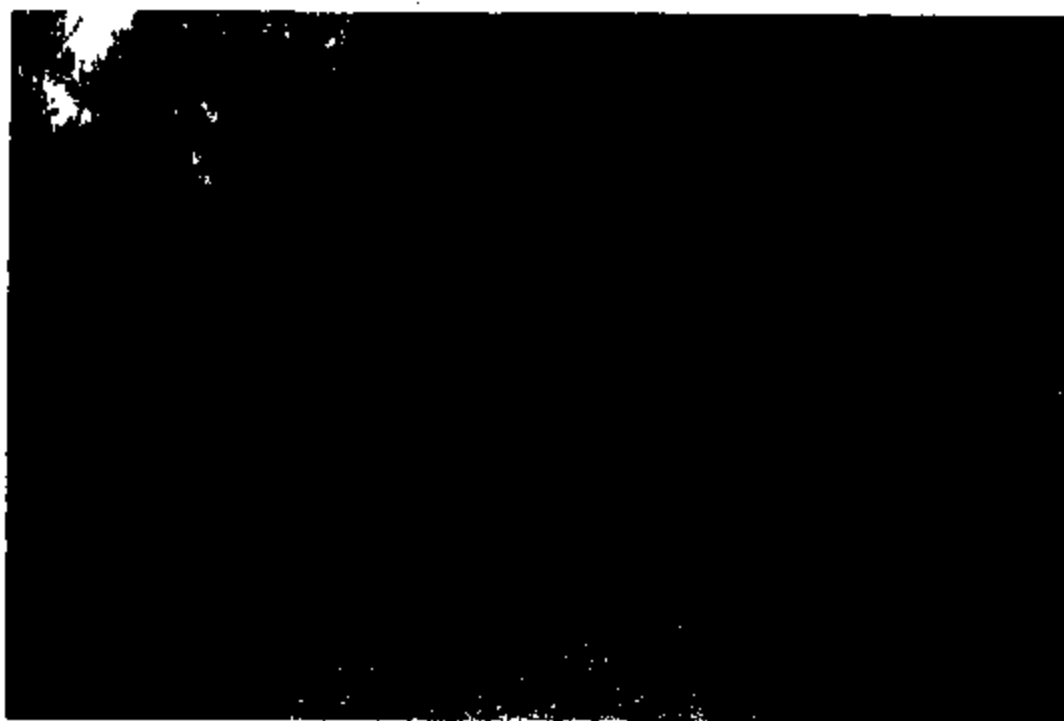






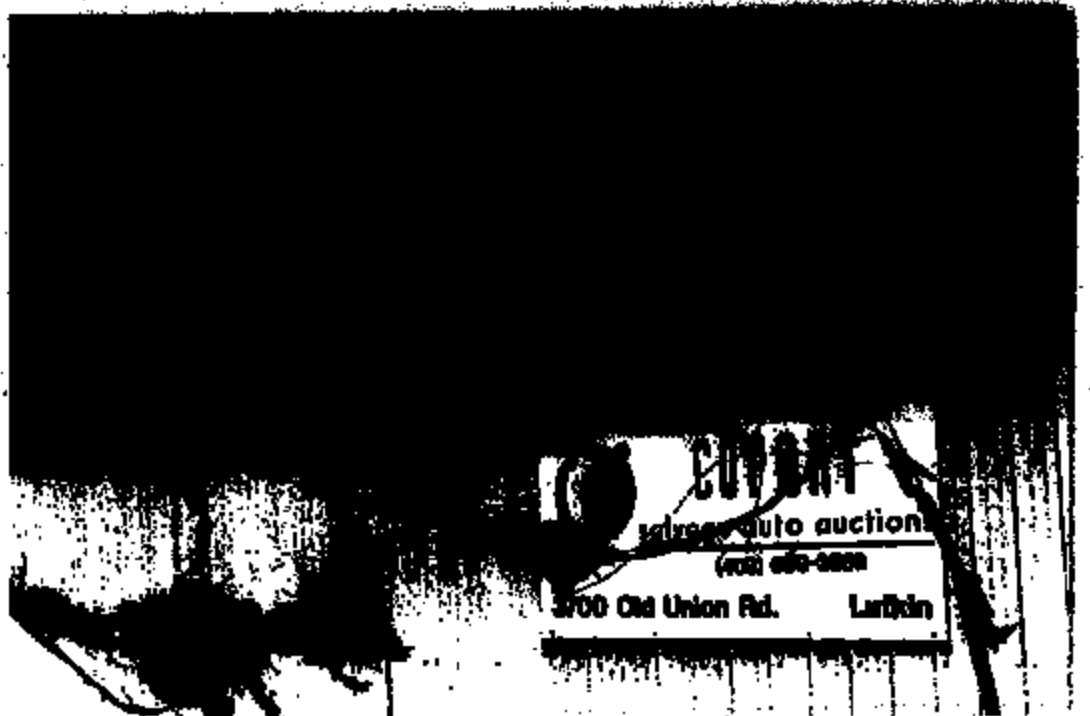
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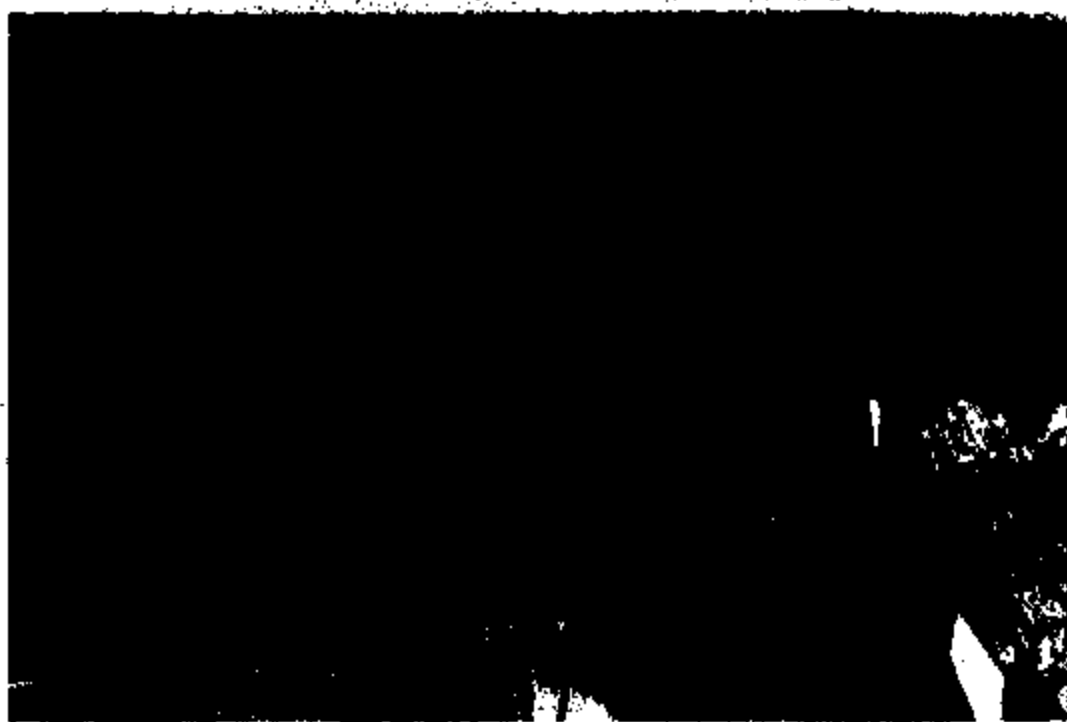






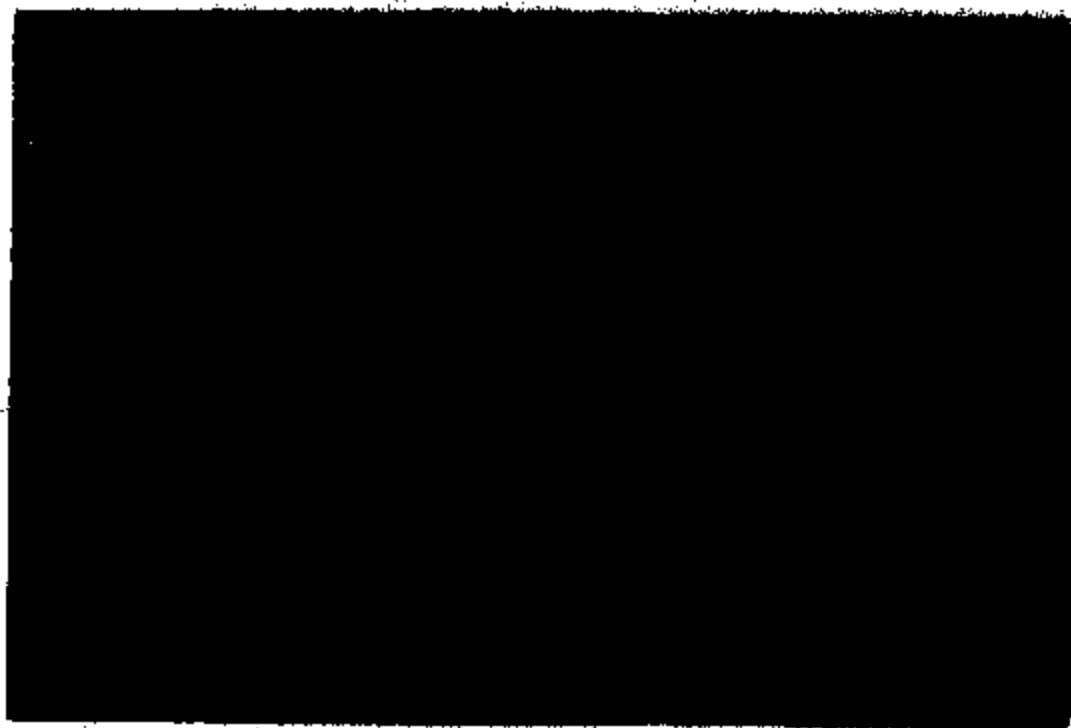
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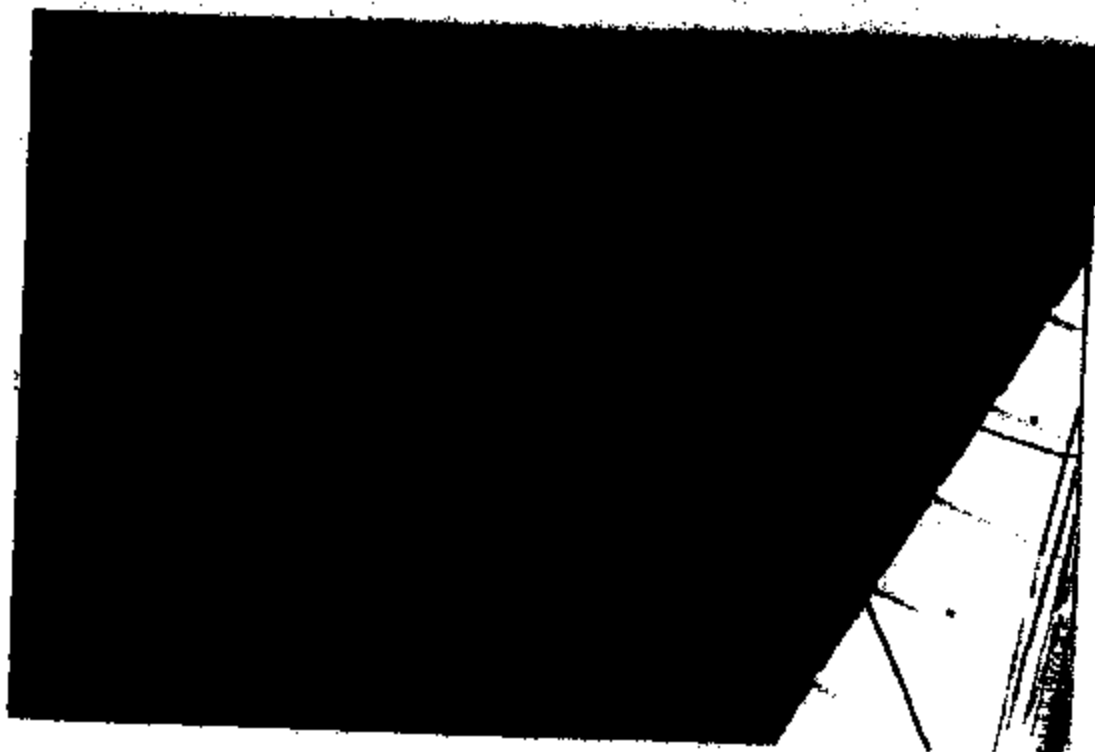
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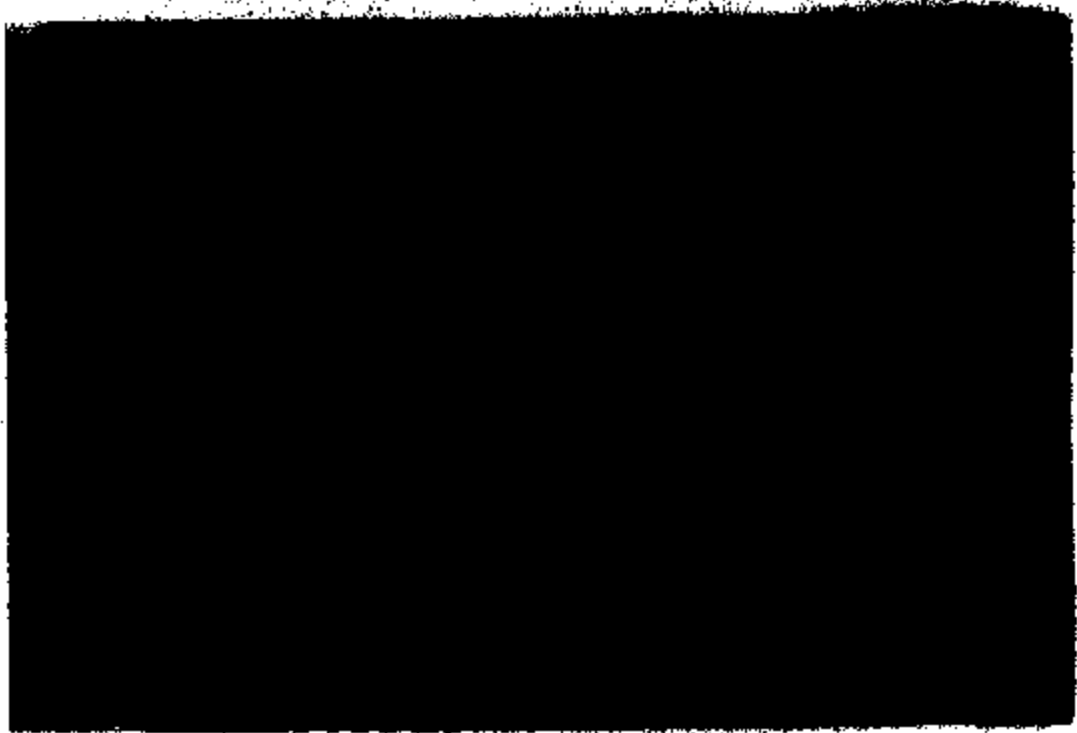


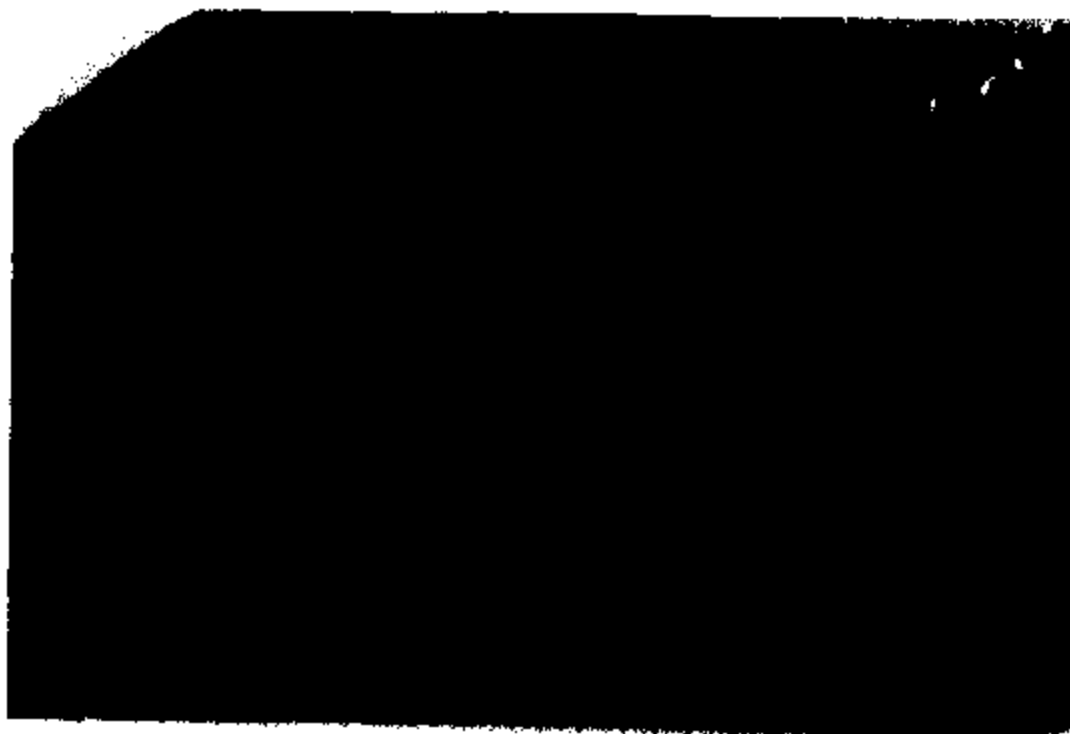




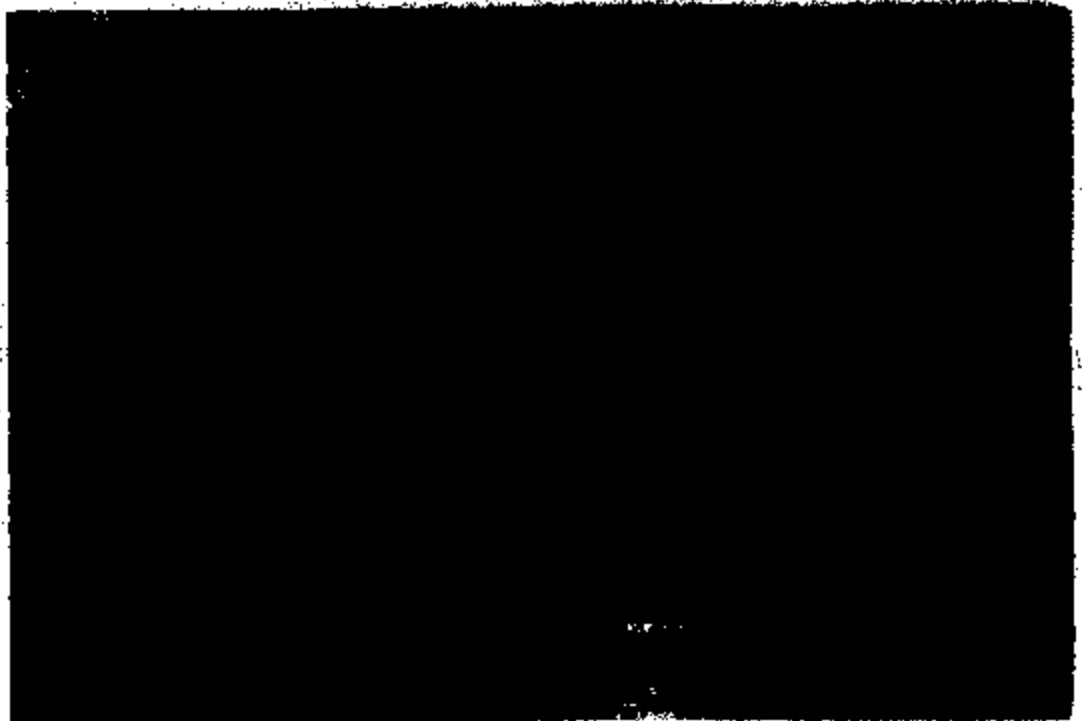


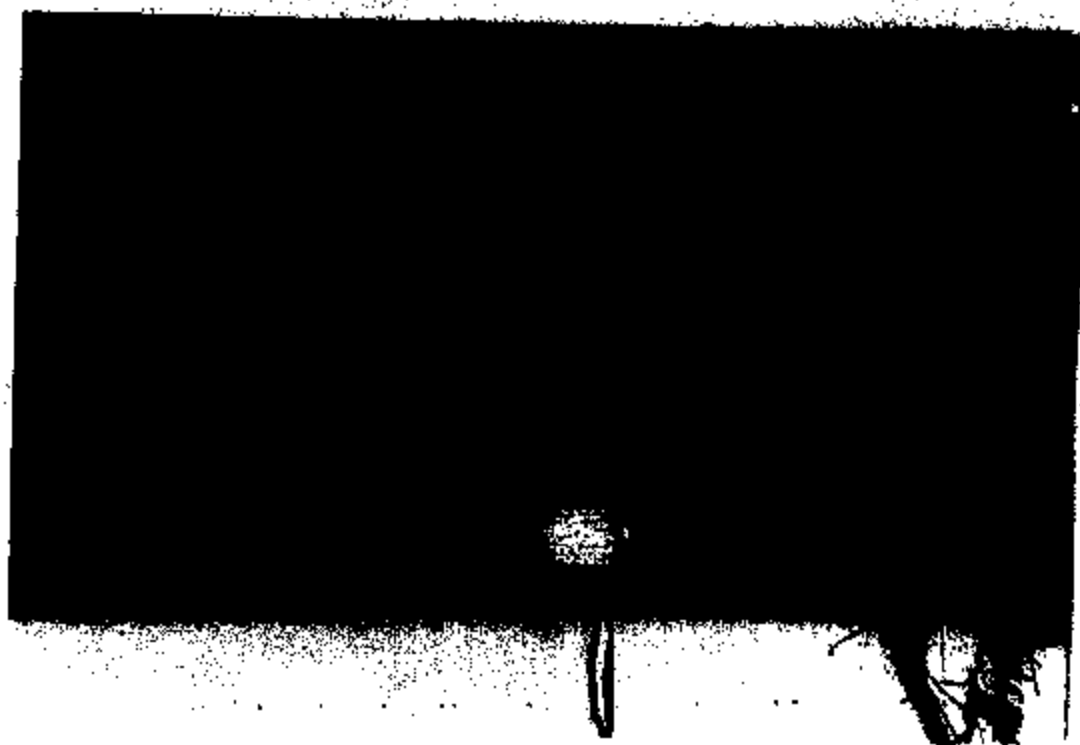
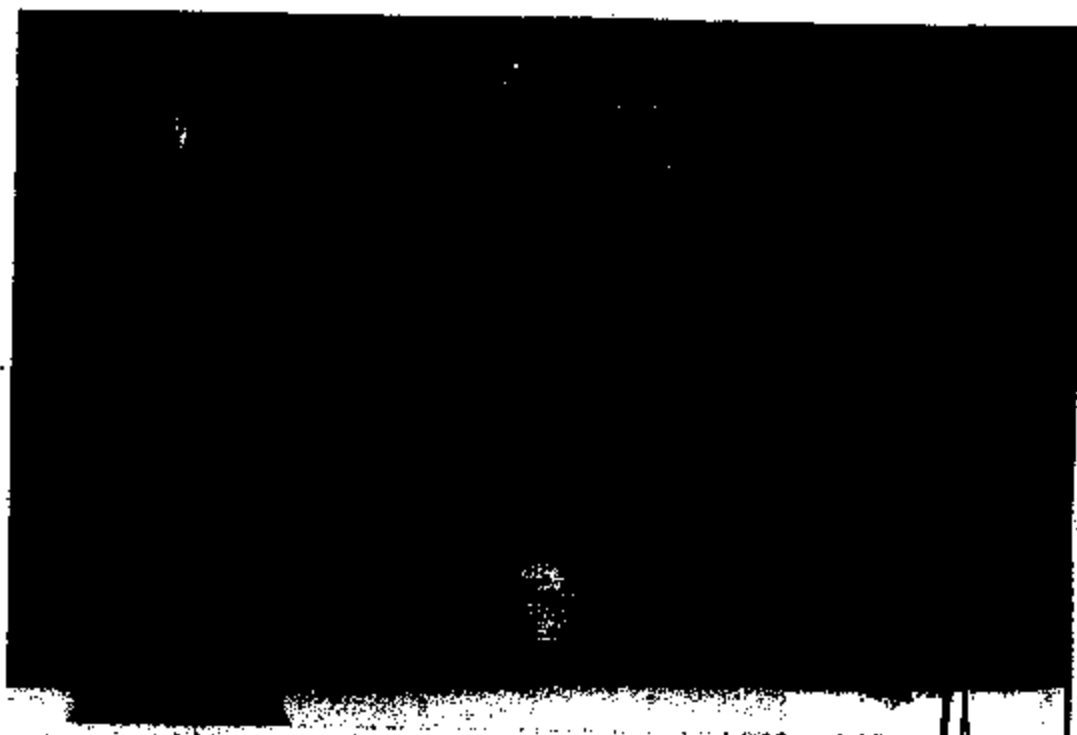




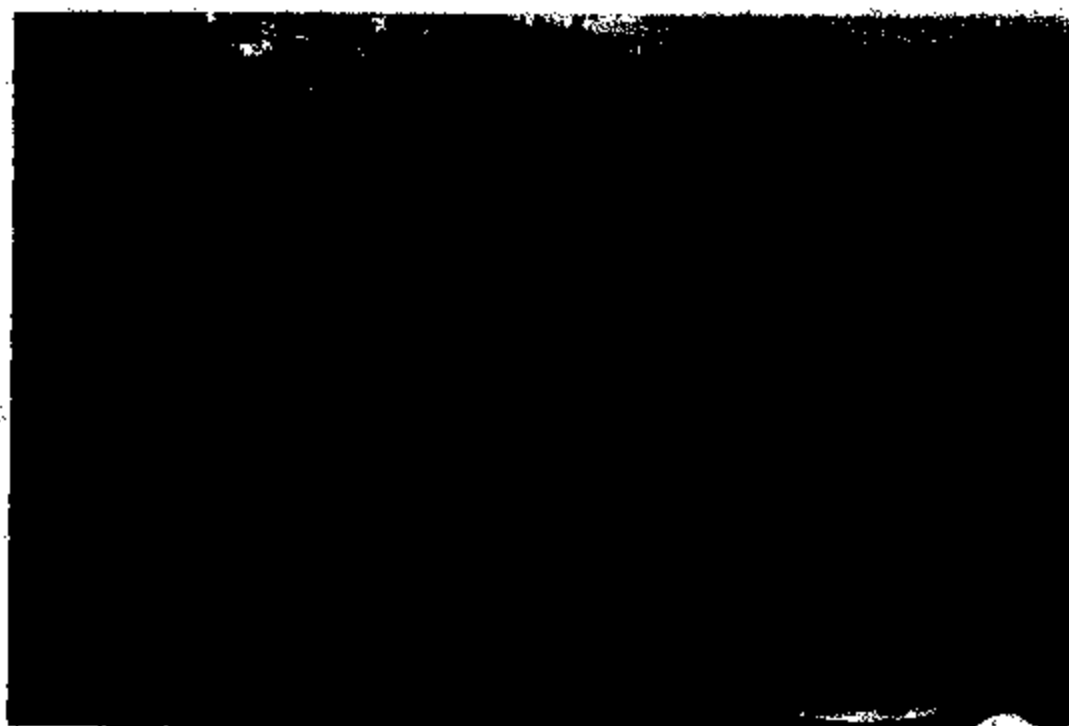


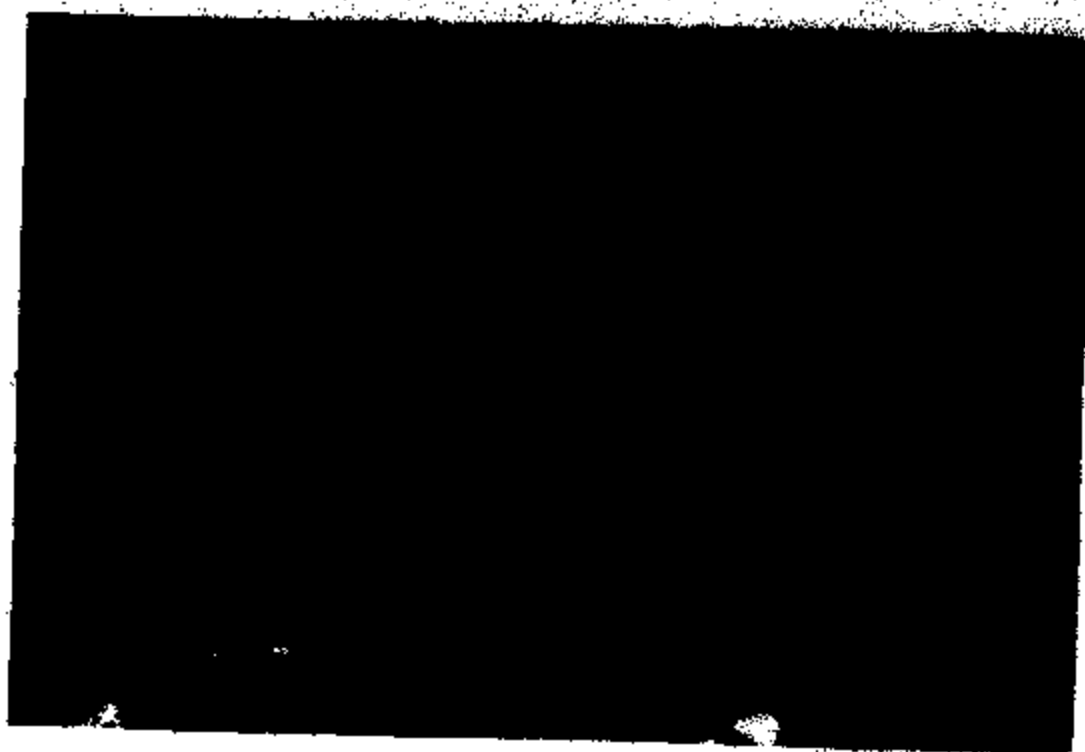
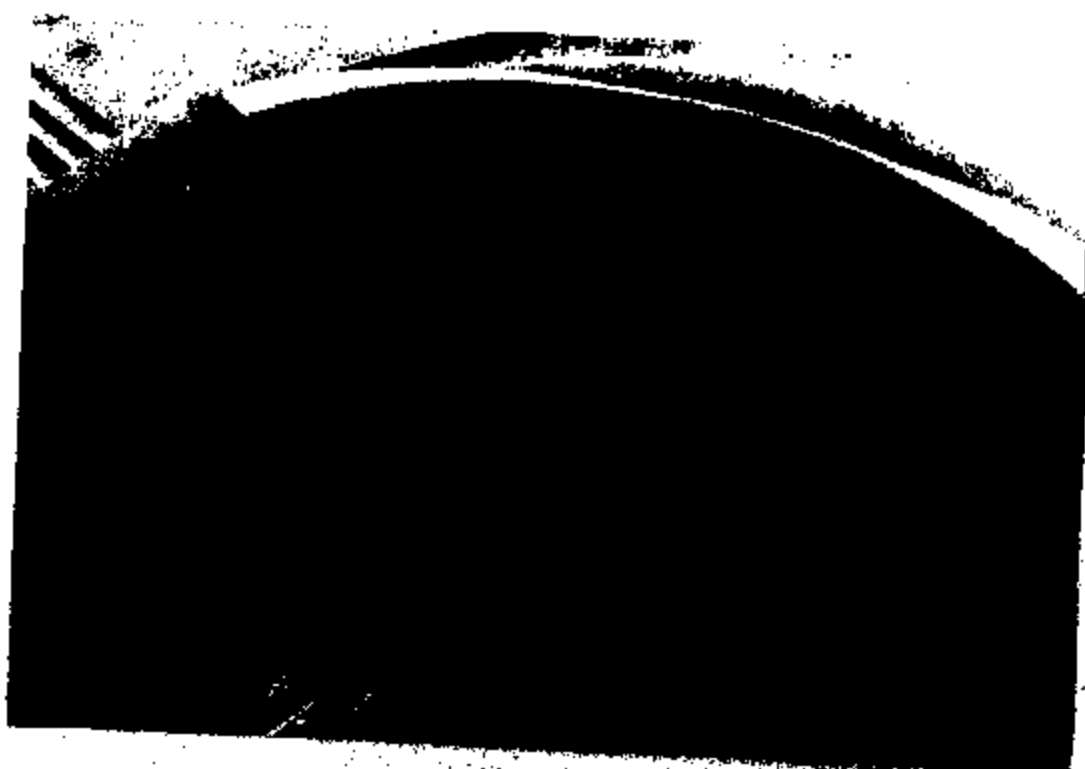


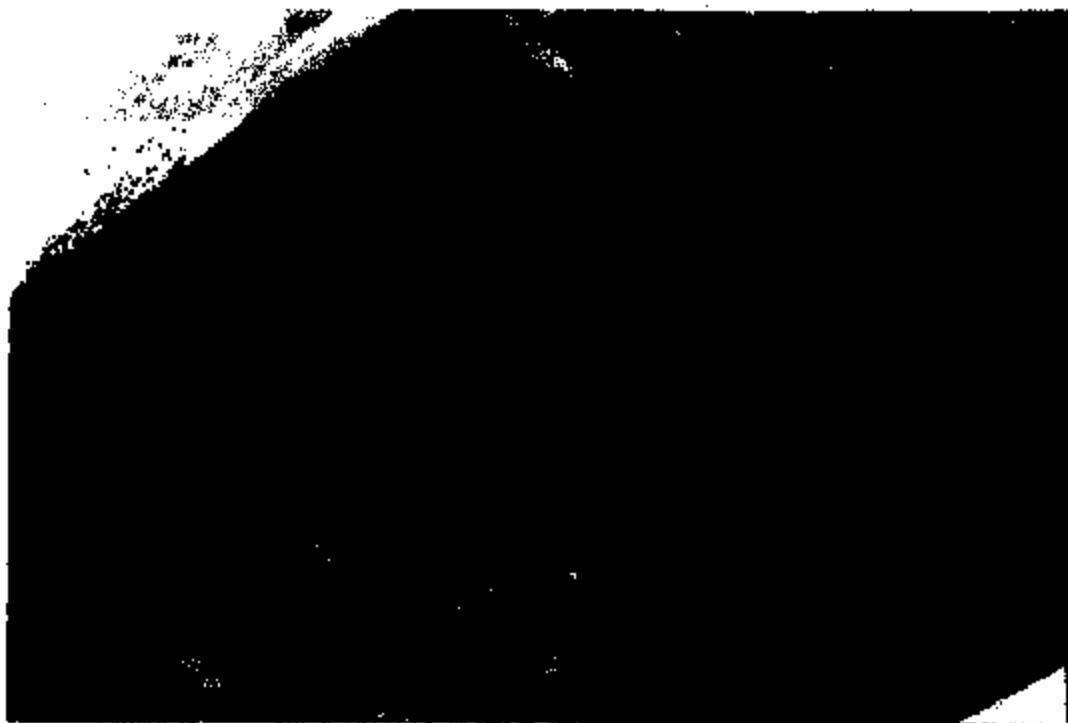


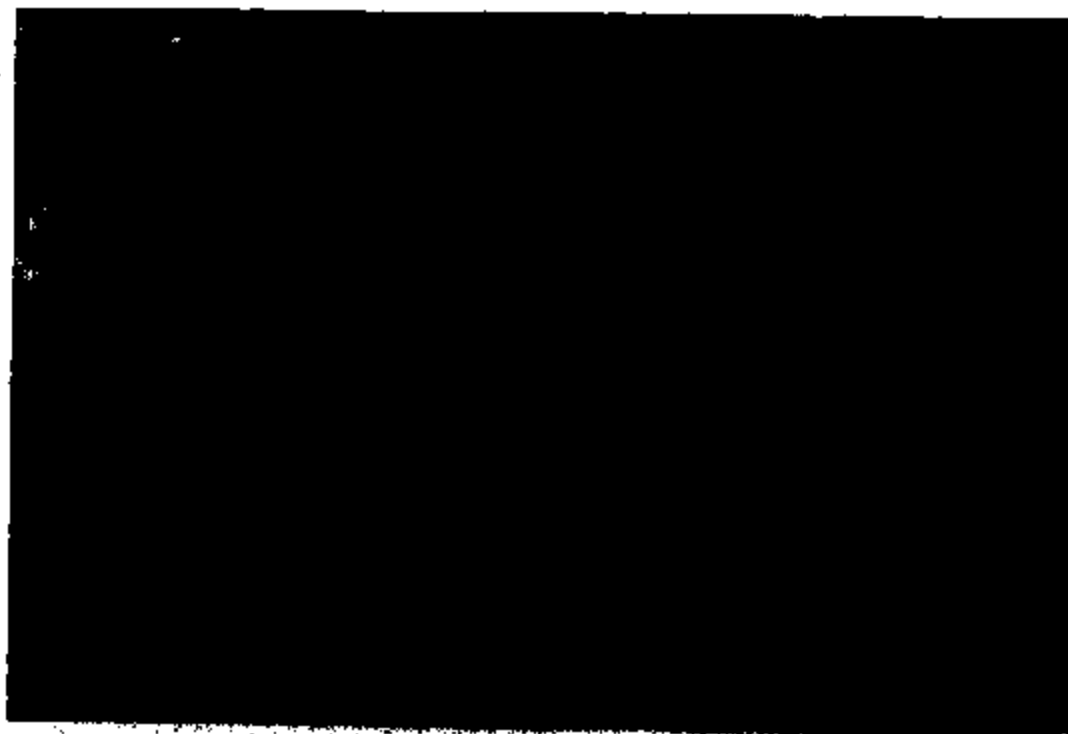




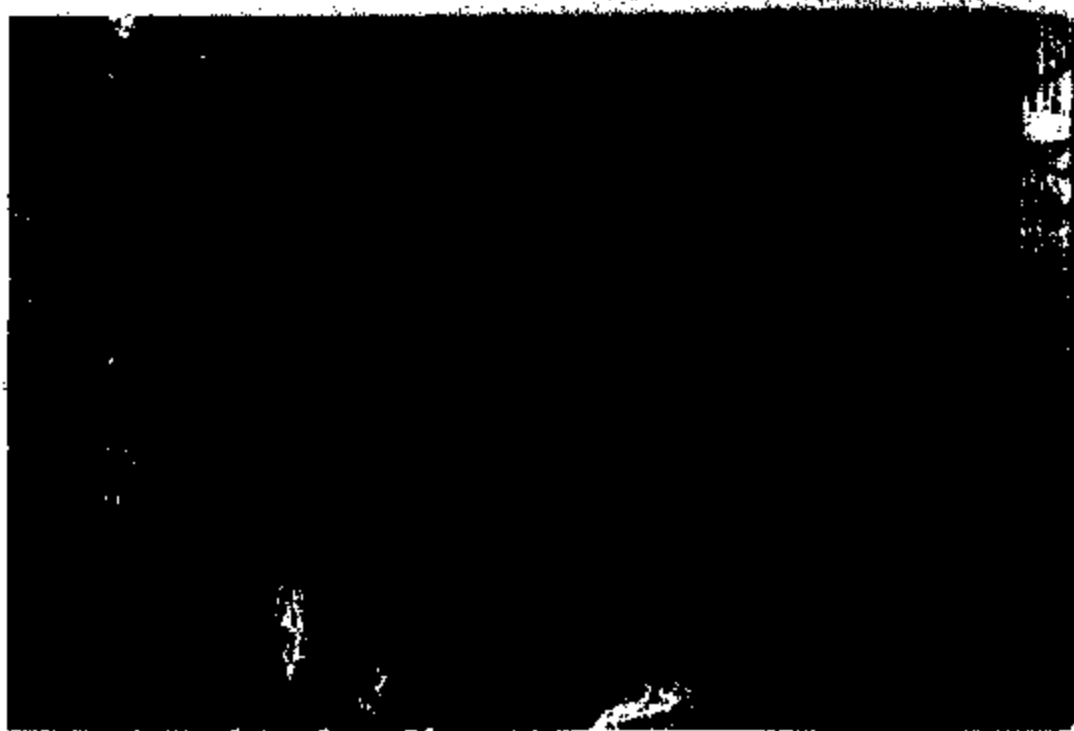
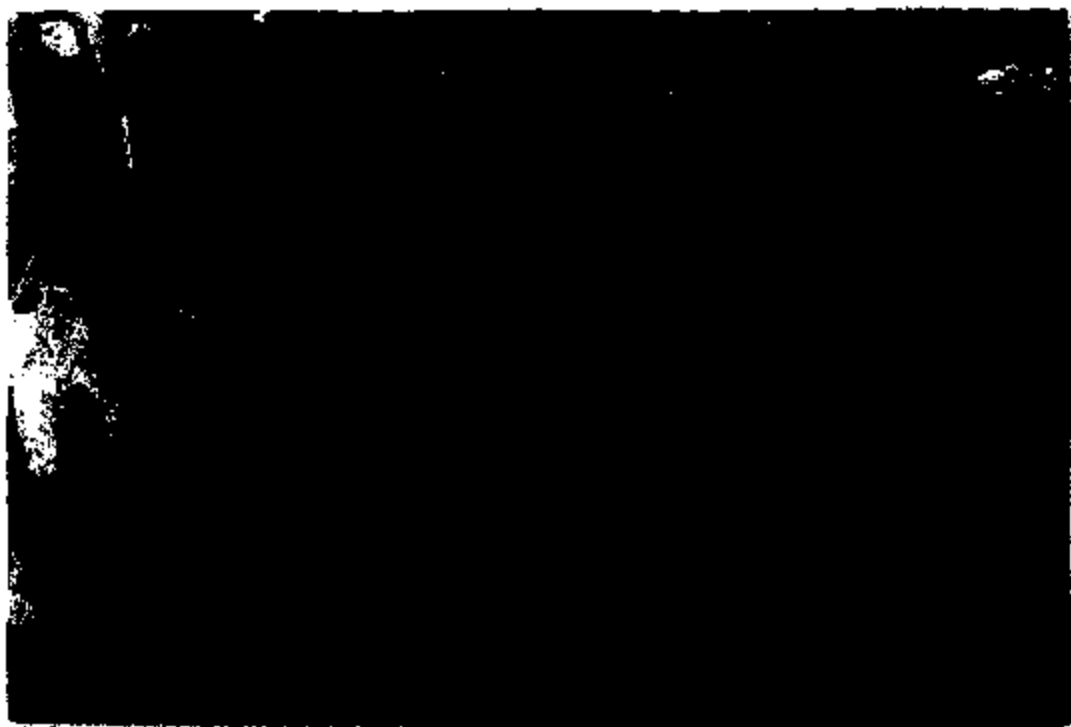




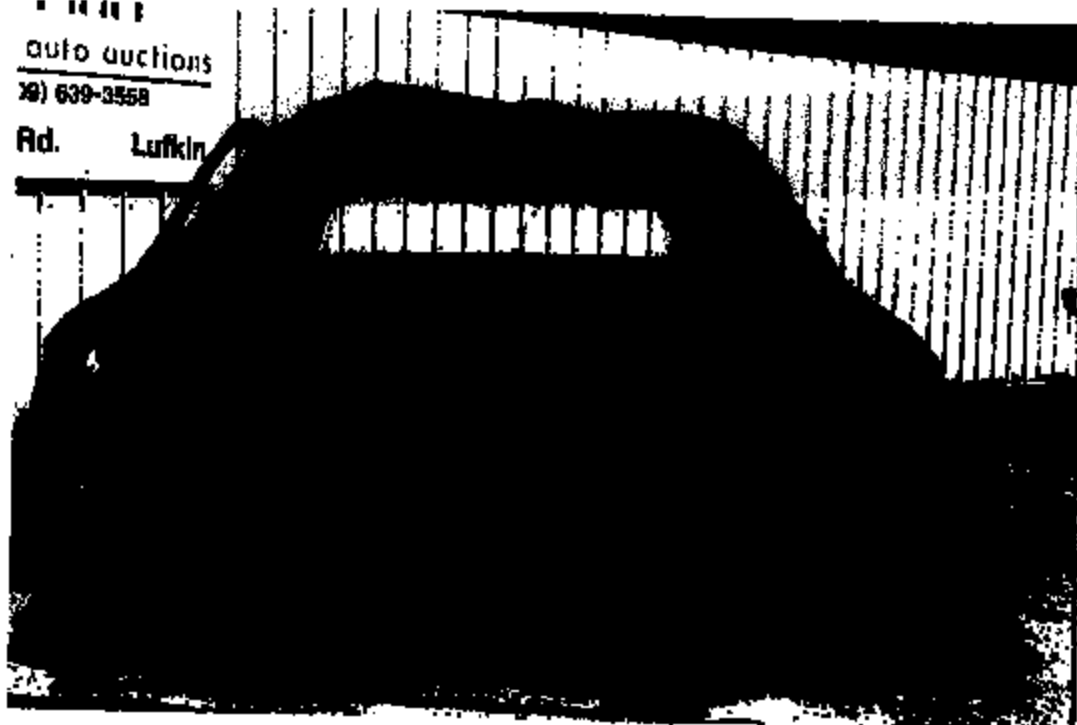




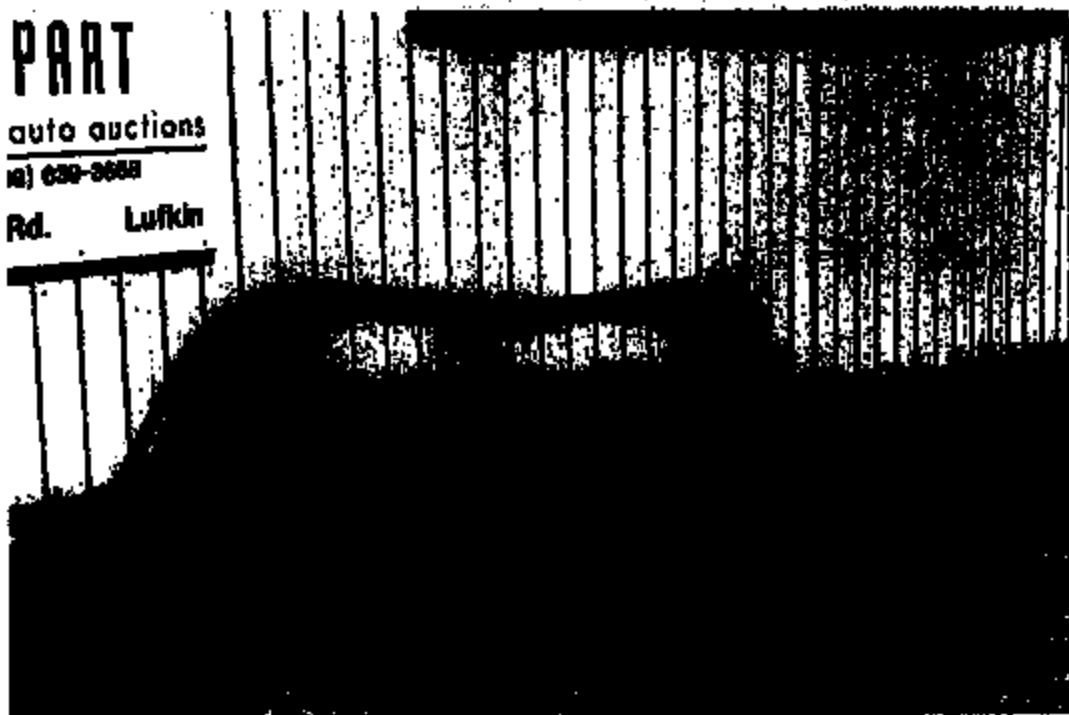


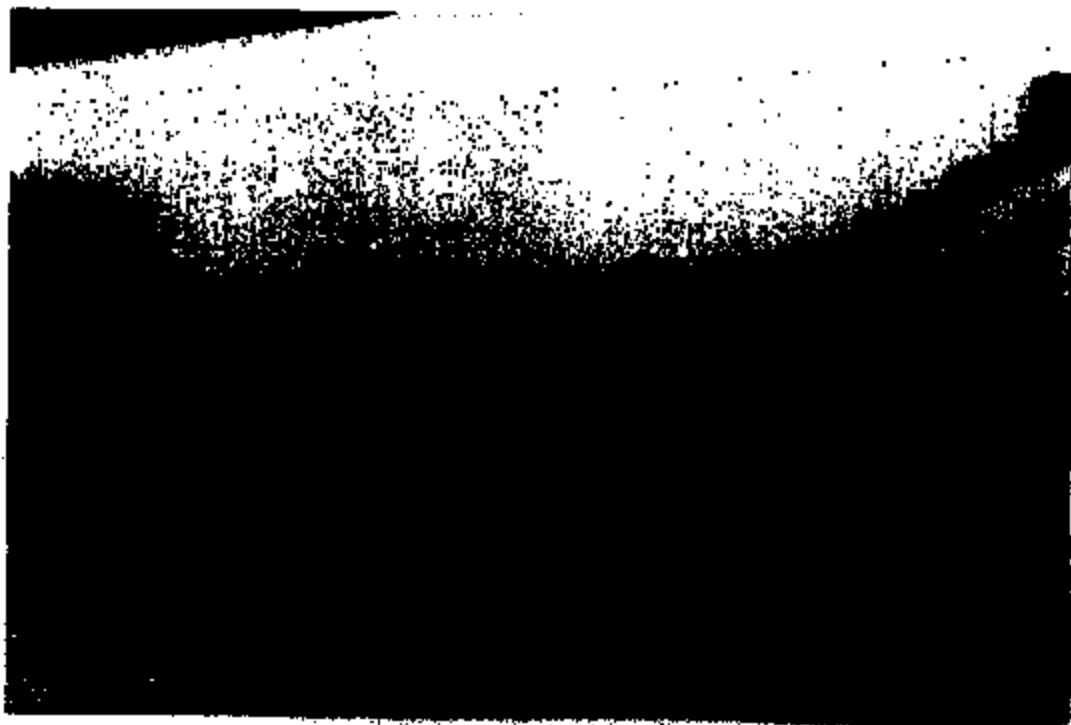


auto auctions  
90) 639-3558  
Rd. Lufkin

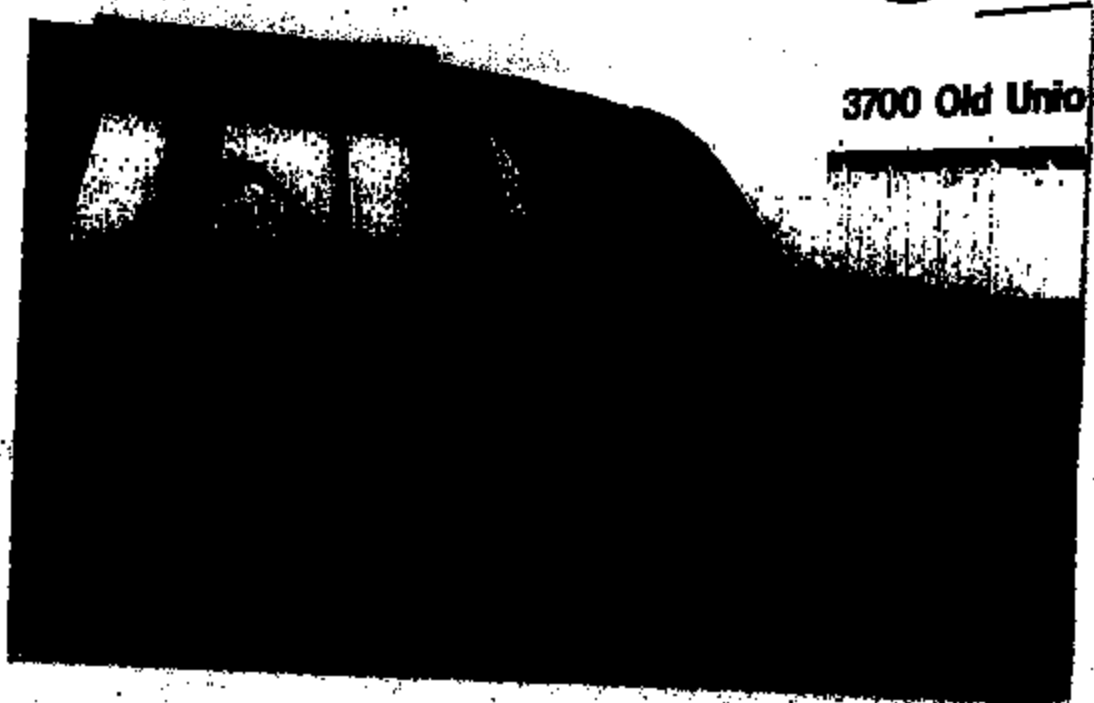


PART  
auto auctions  
90) 639-3558  
Rd. Lufkin

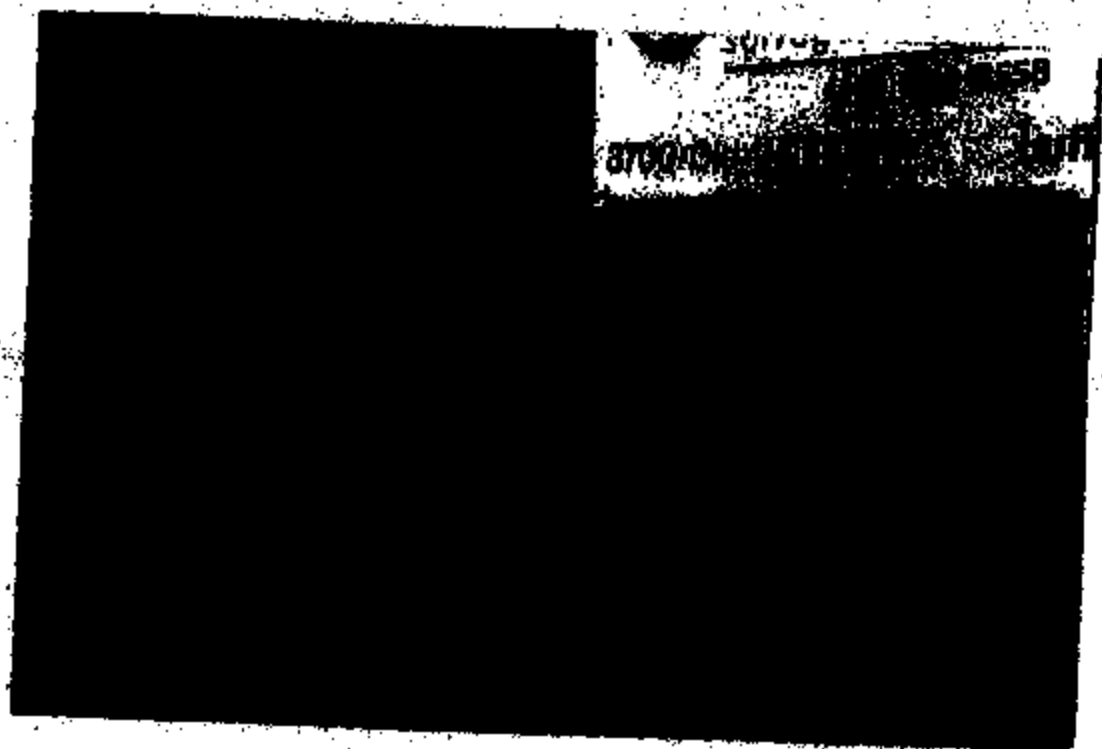




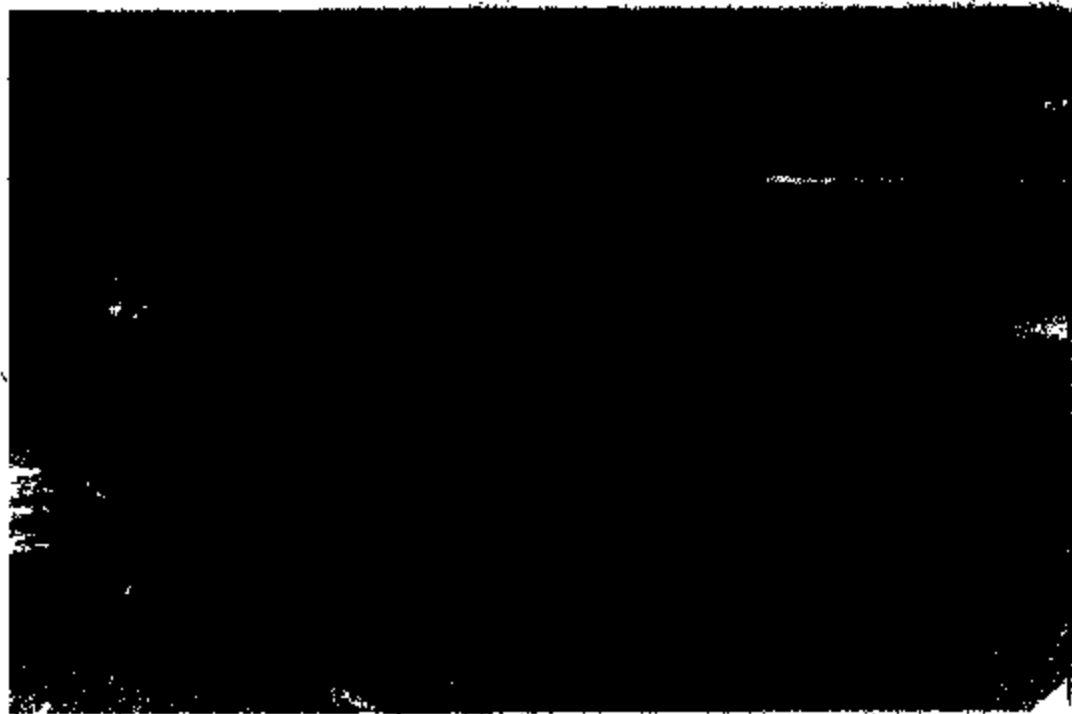
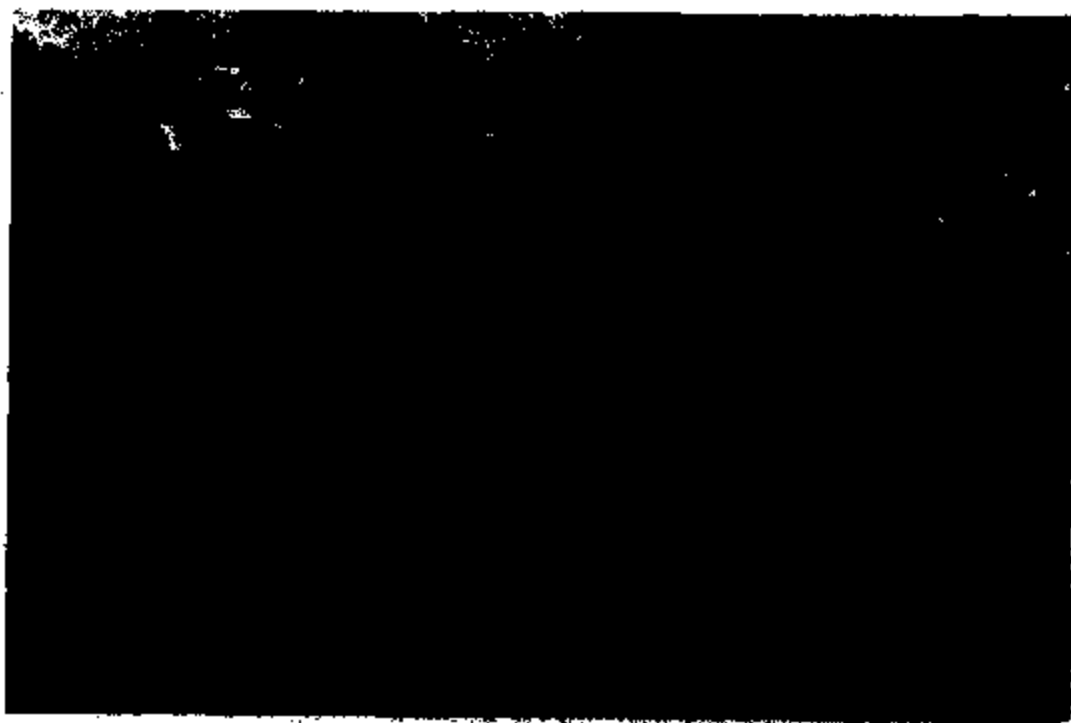


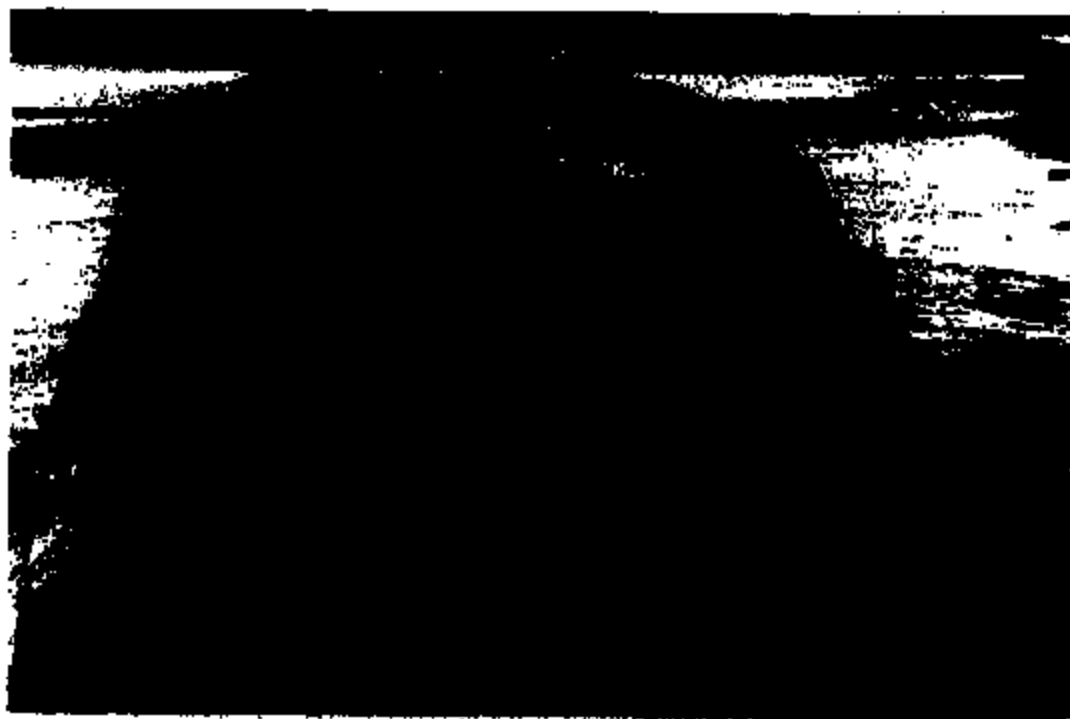


3700 Old Union



3700 Old Union

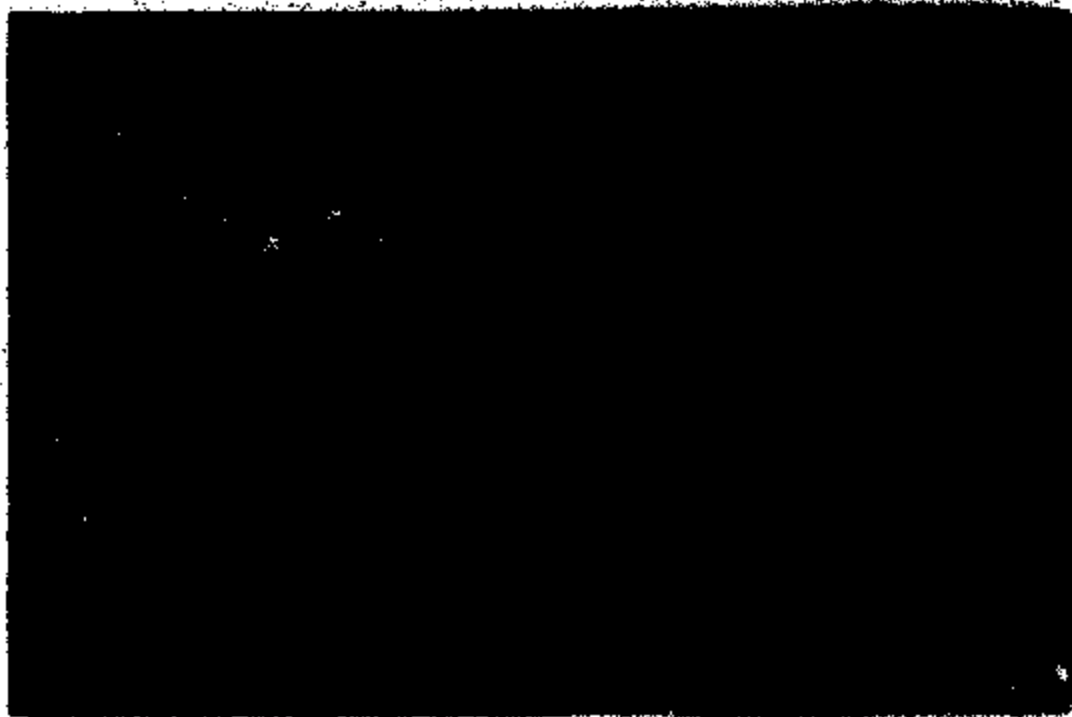




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ERM2-826 31151

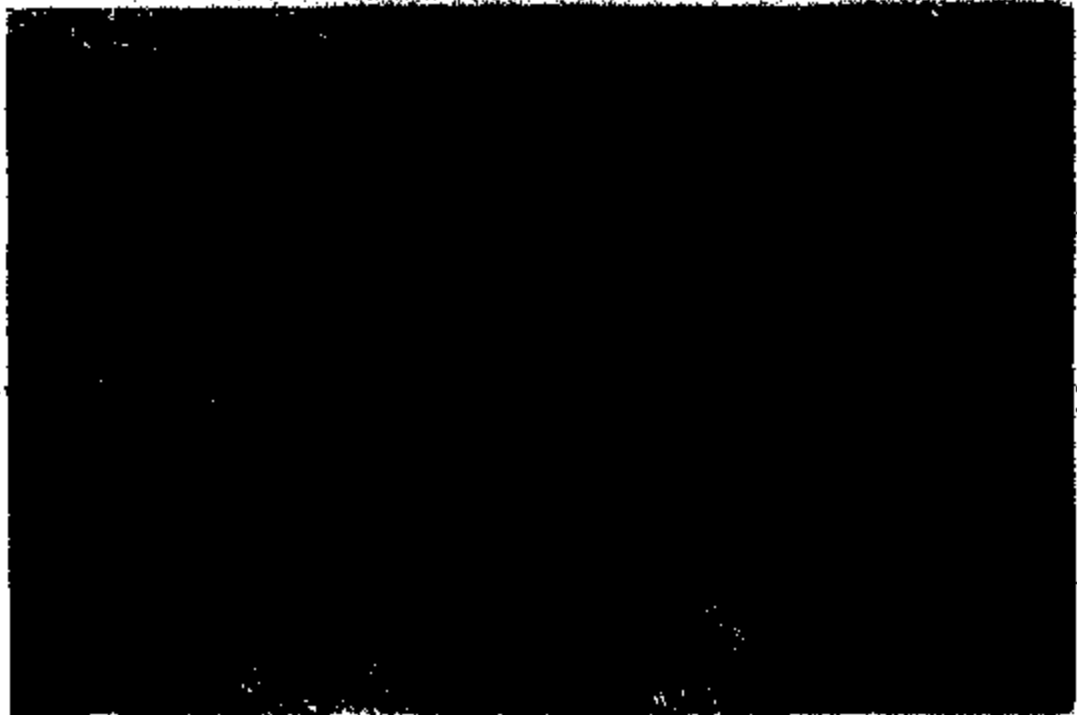


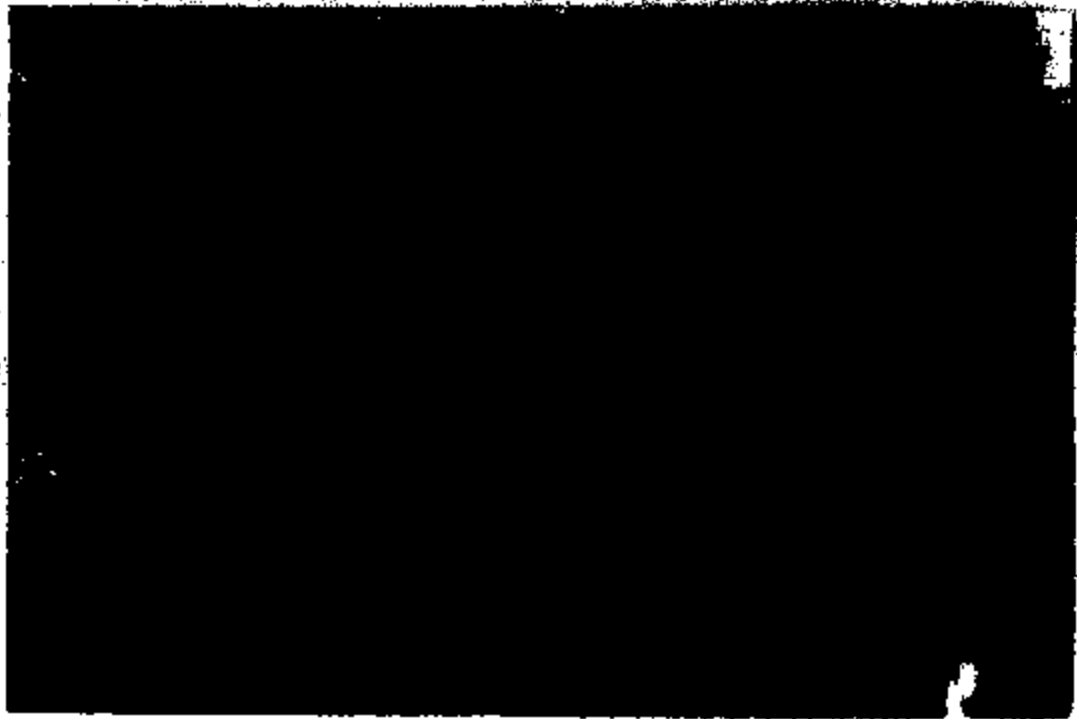
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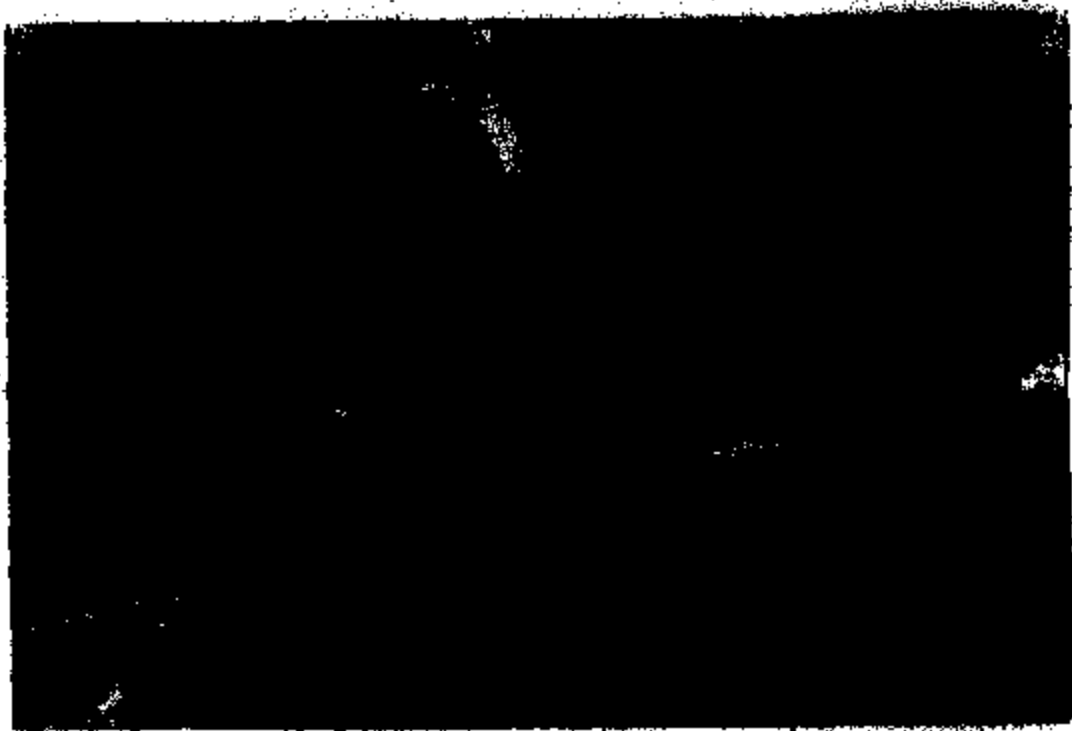






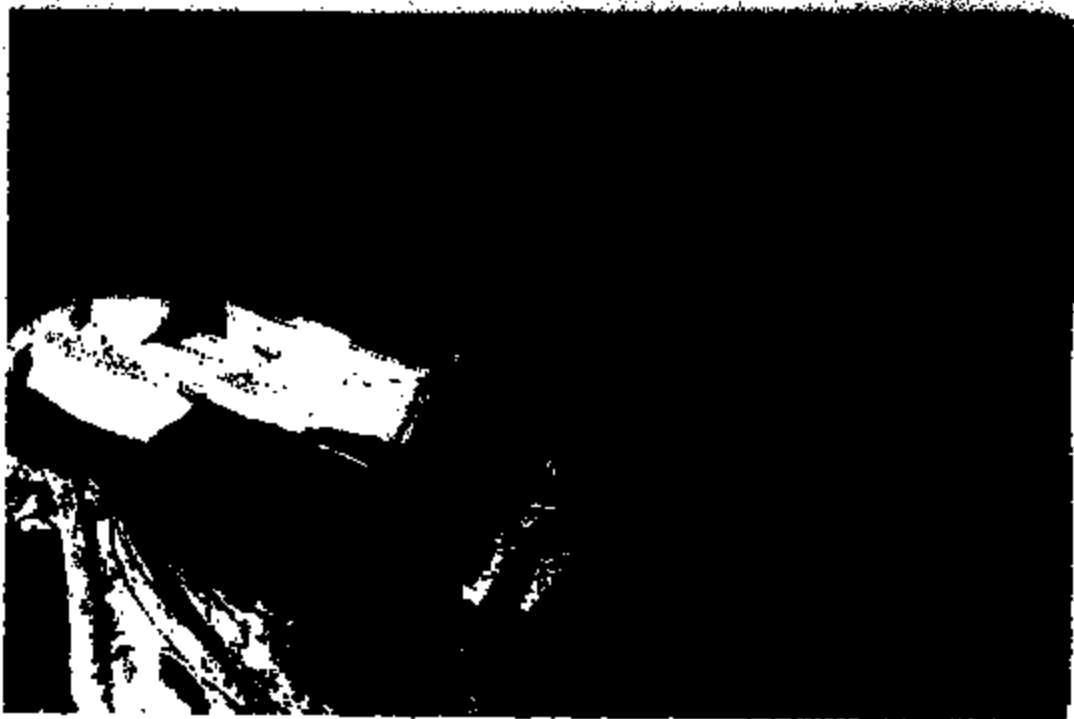






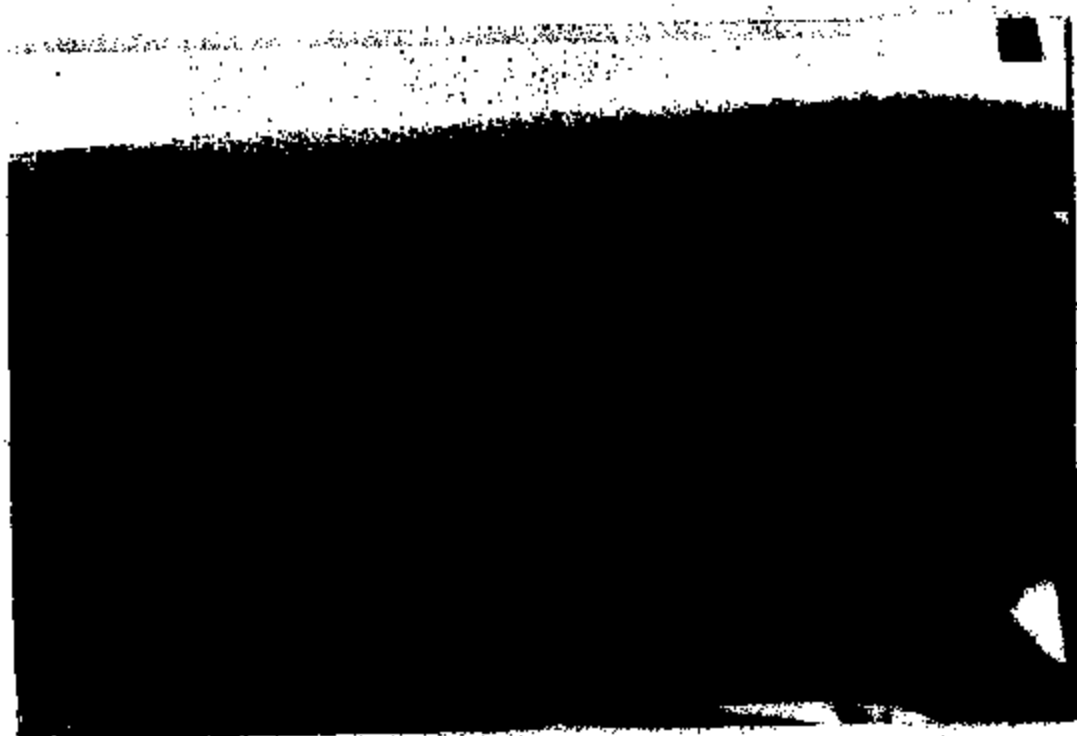


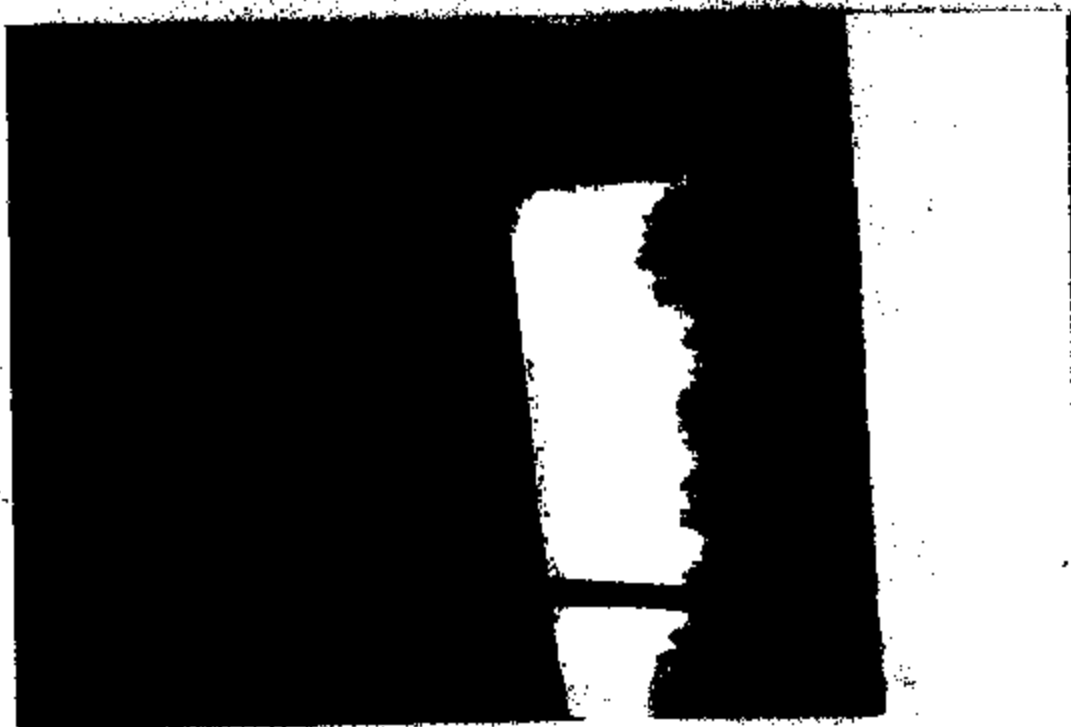
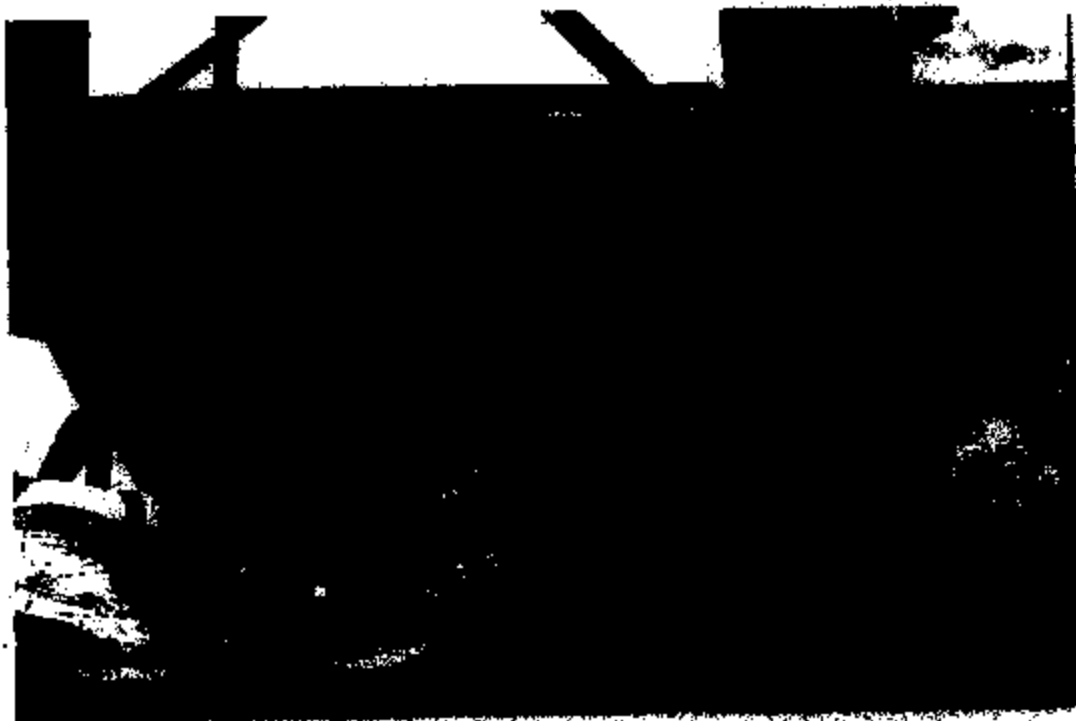








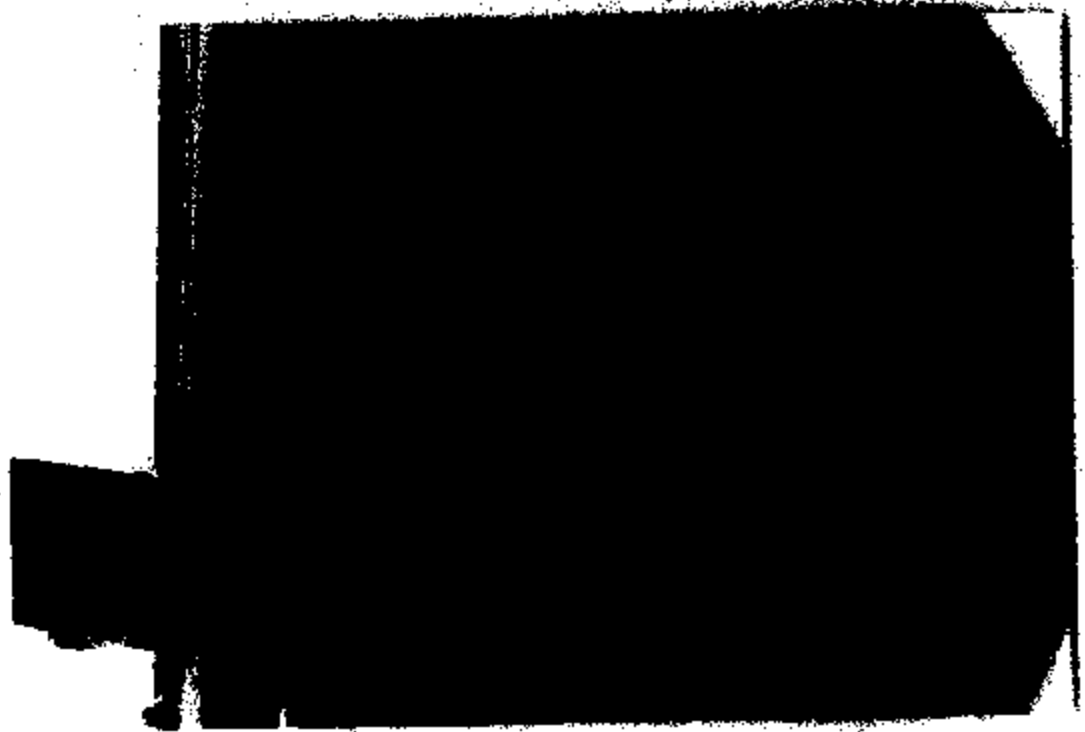
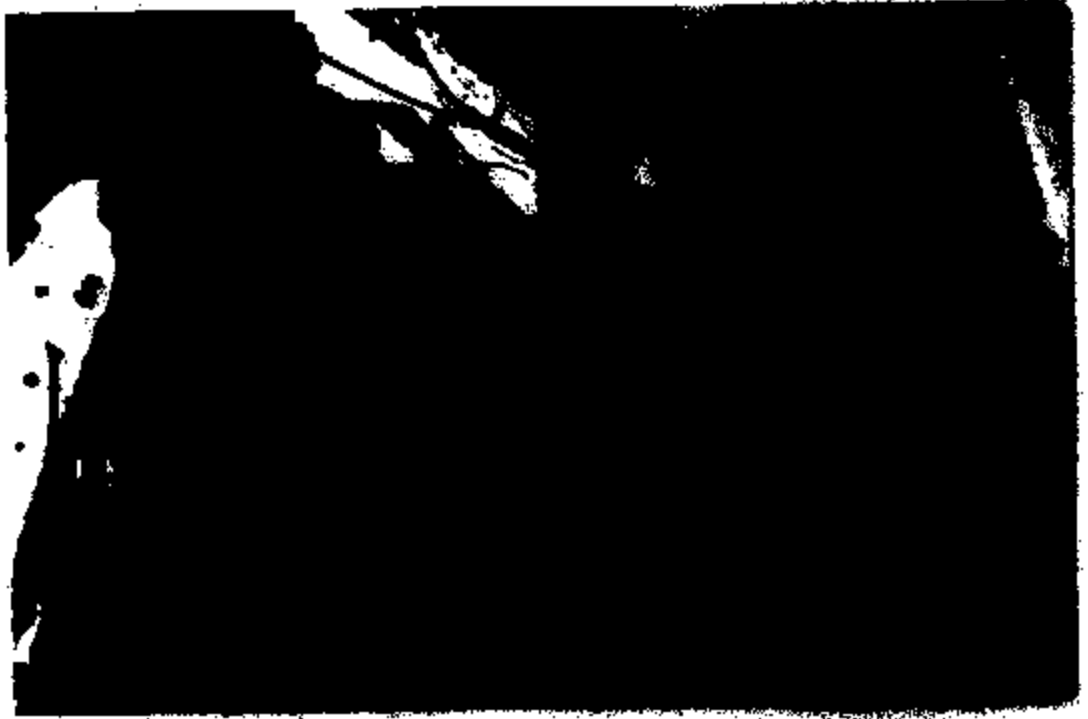




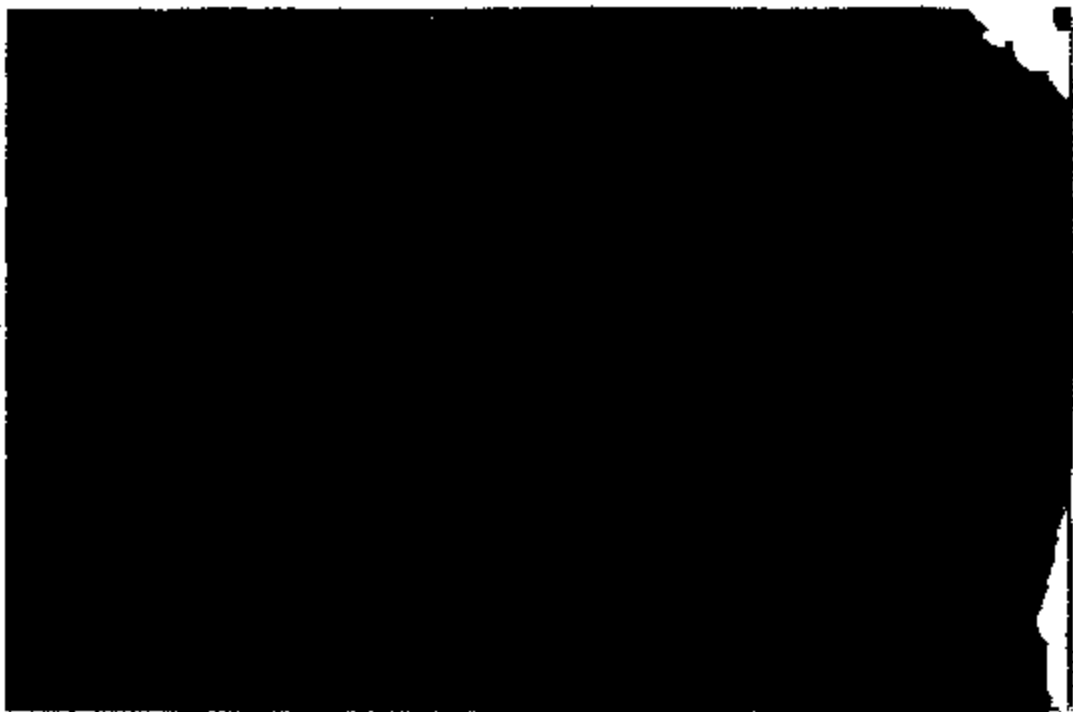


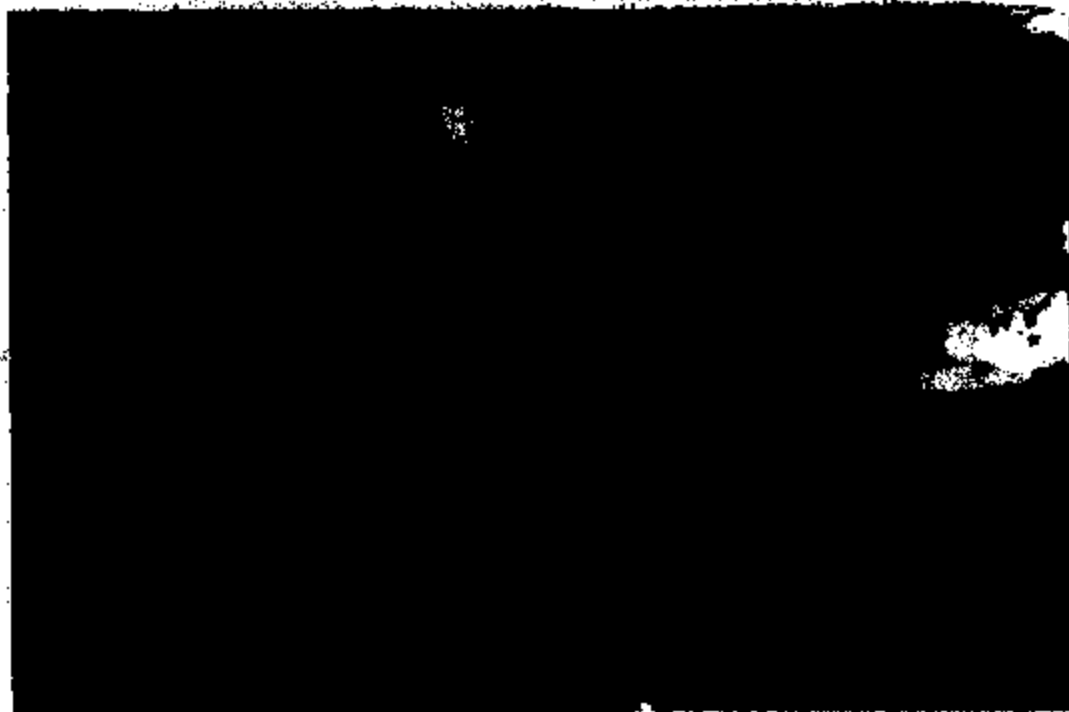


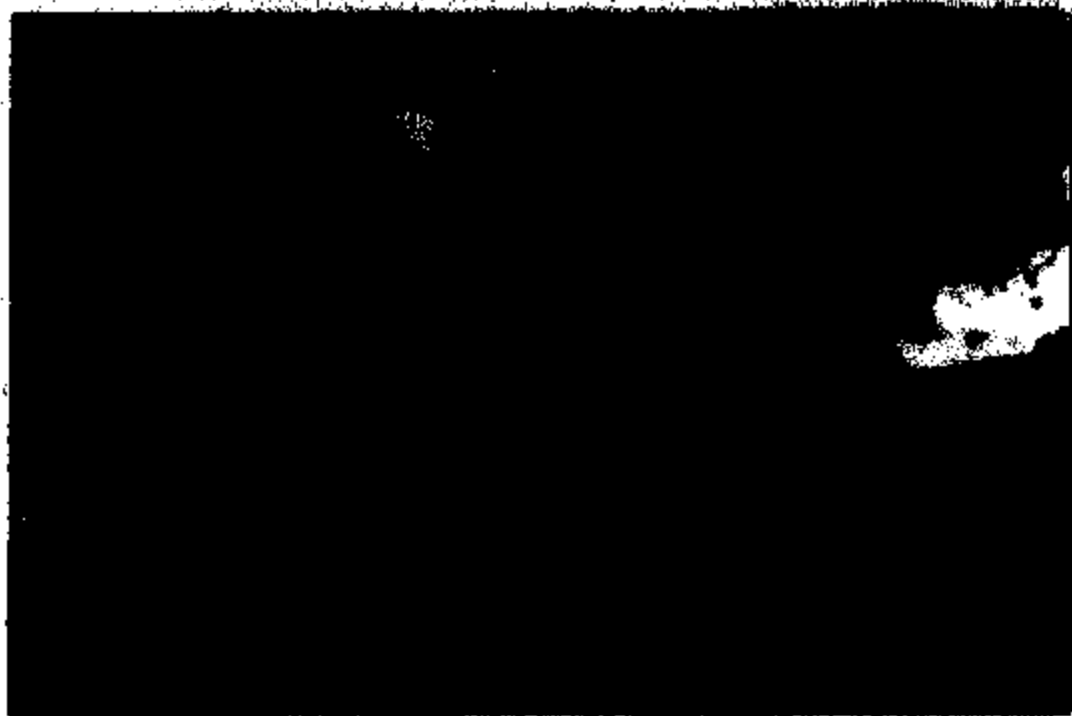


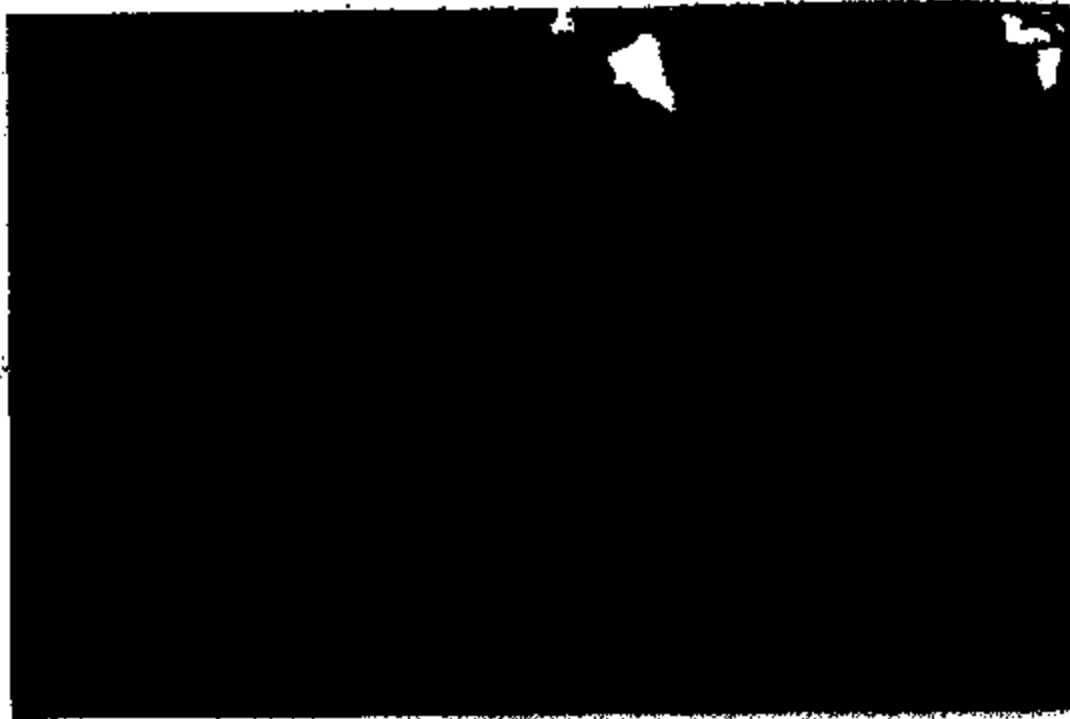




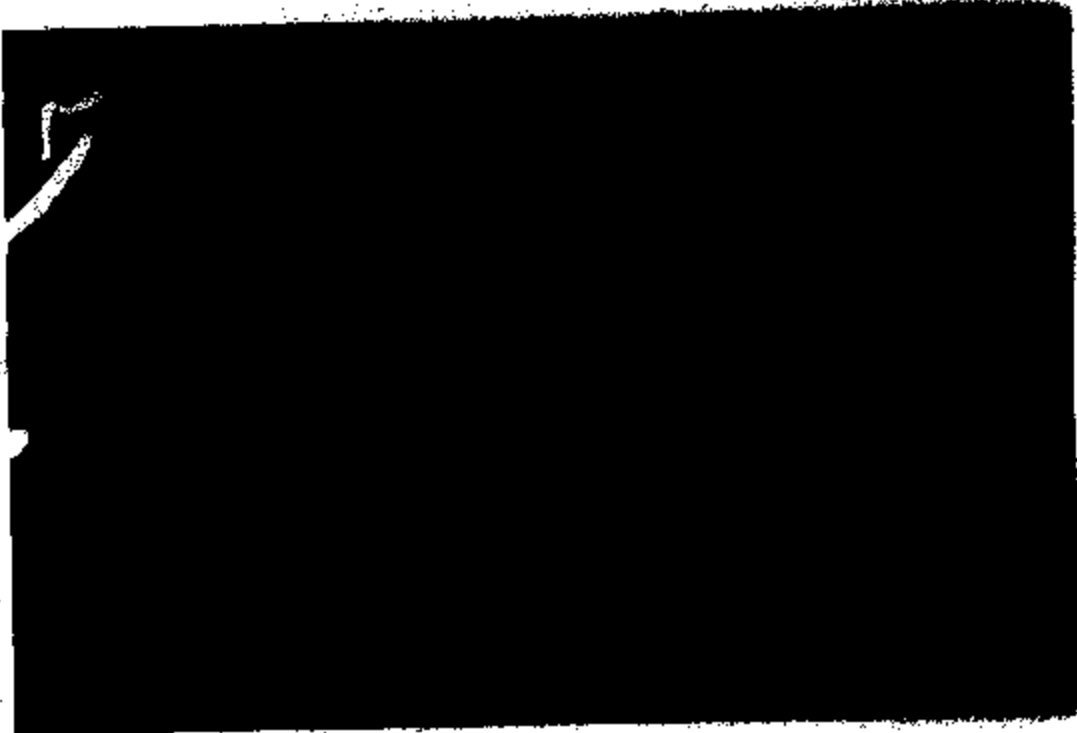
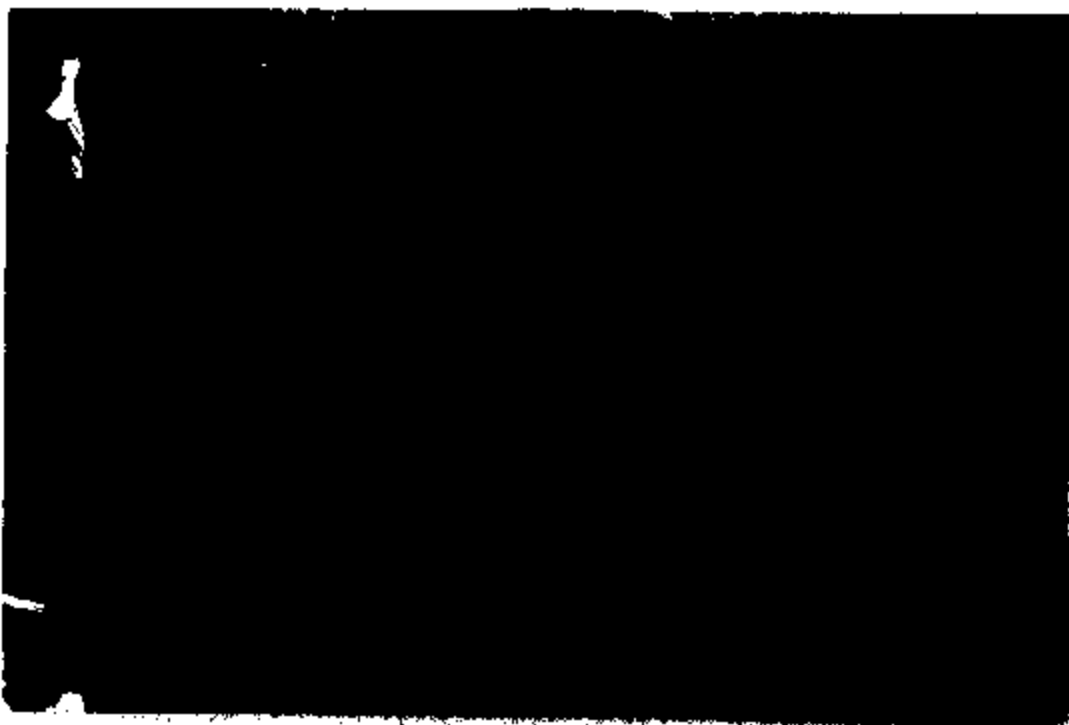












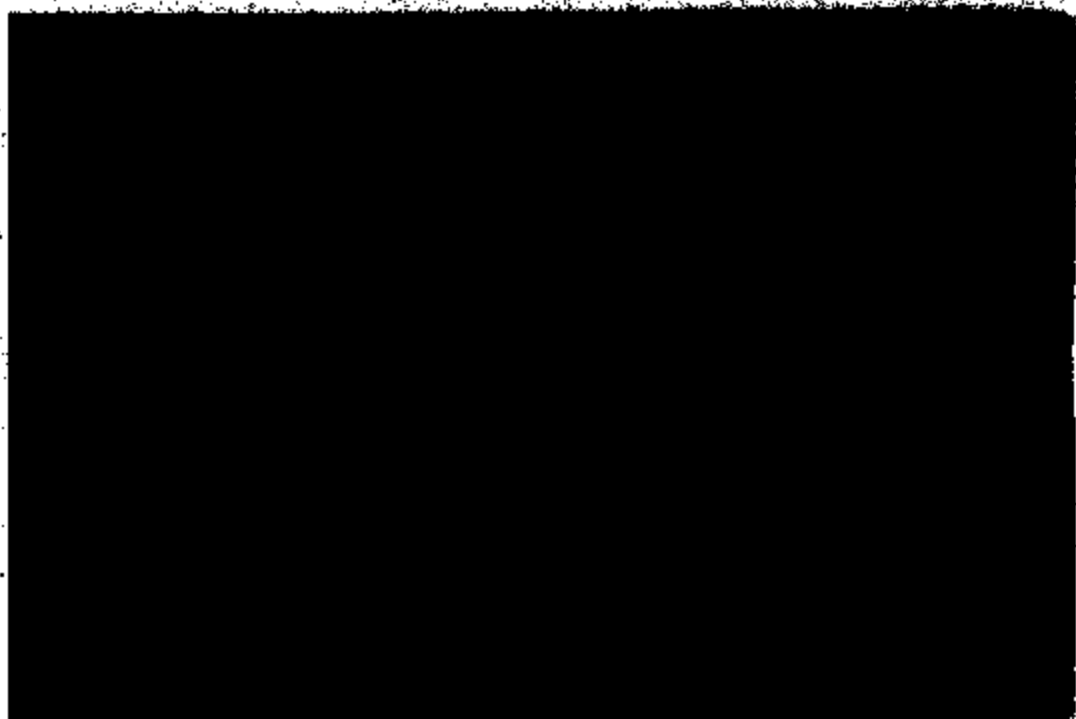


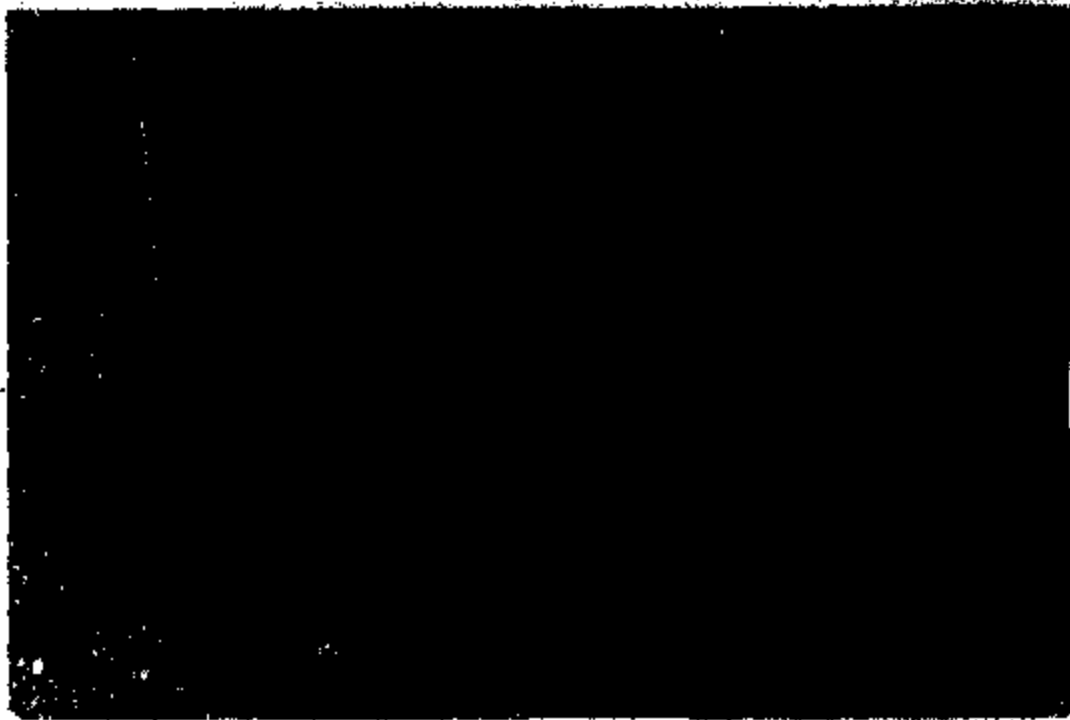


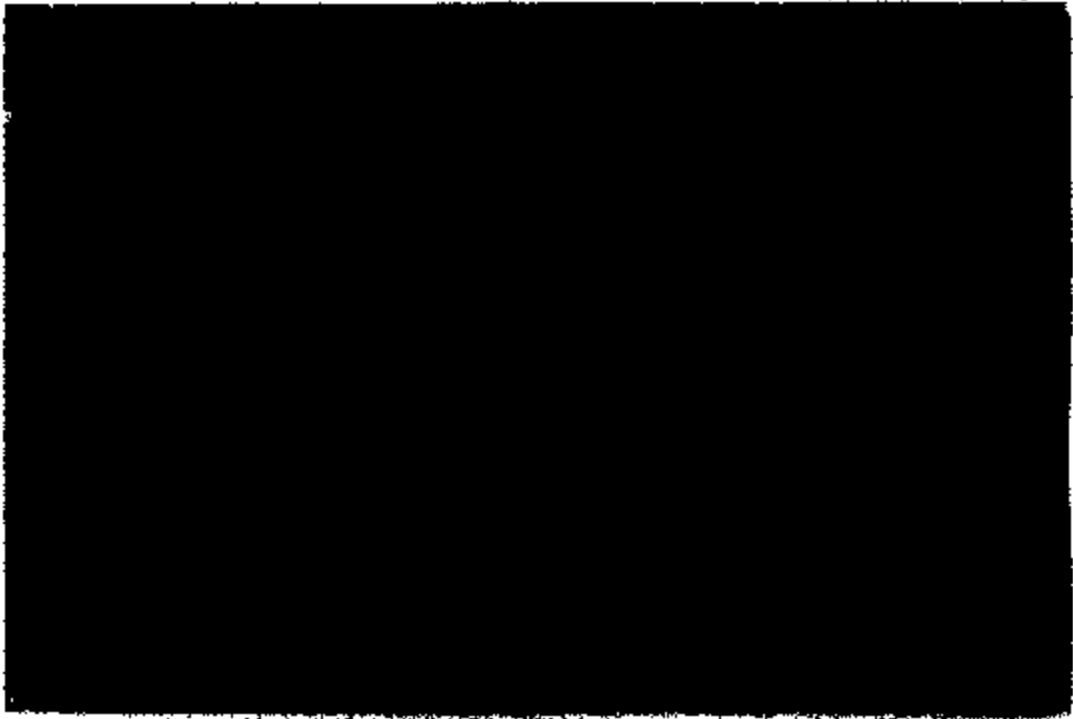


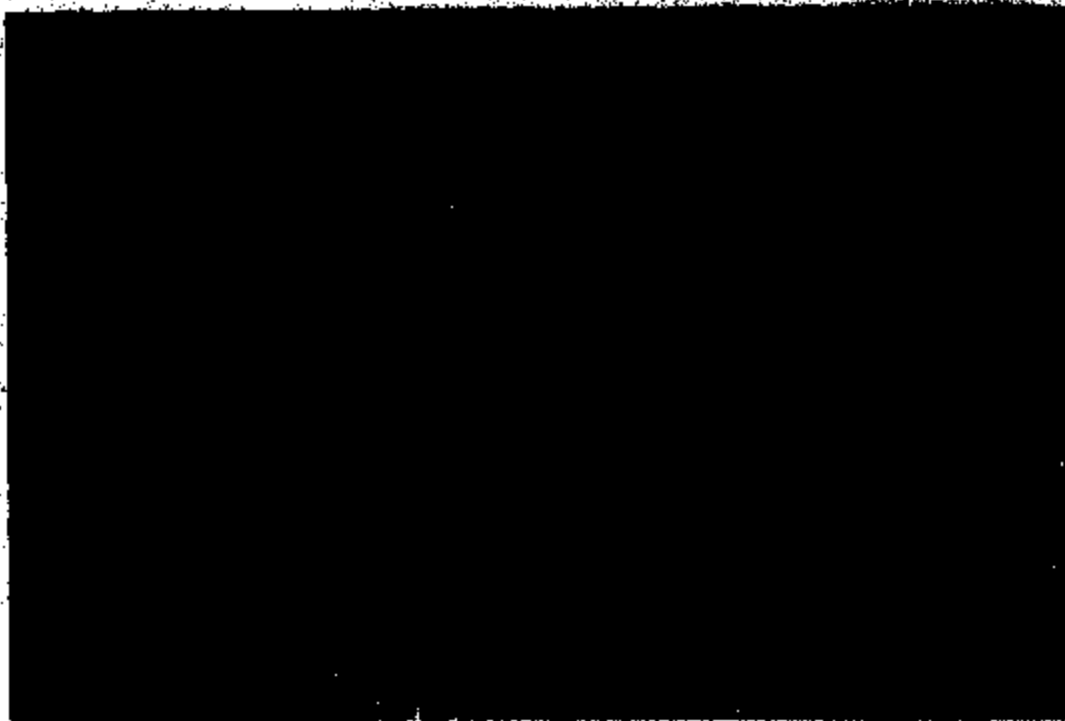






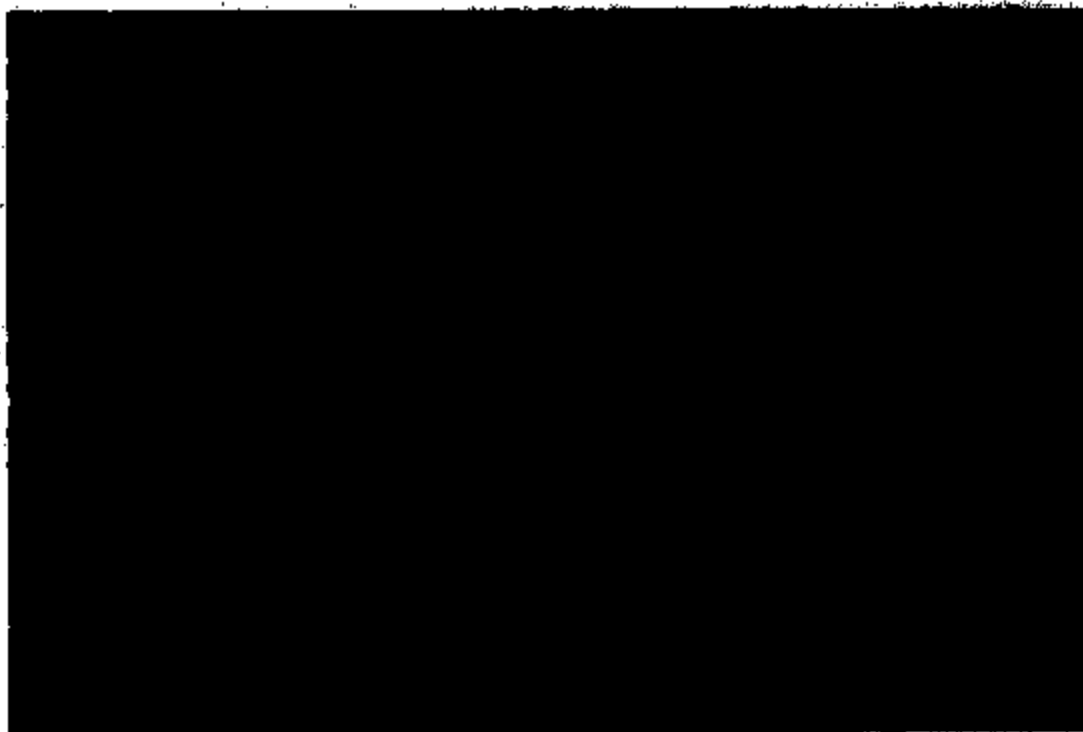


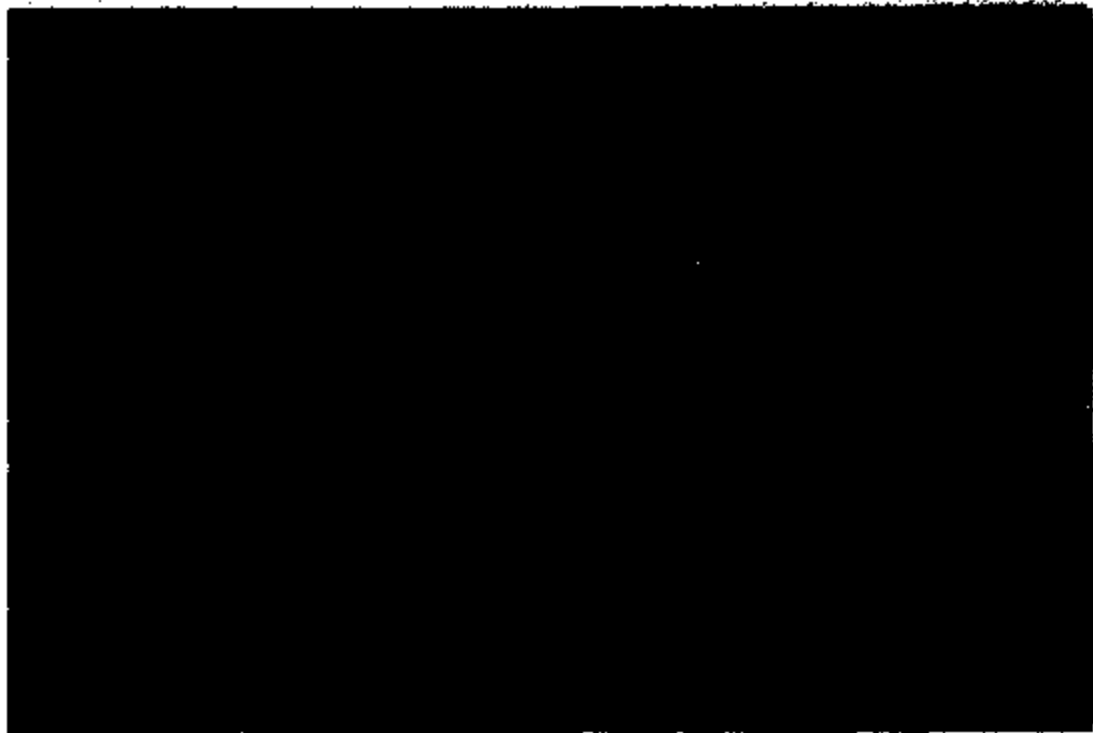


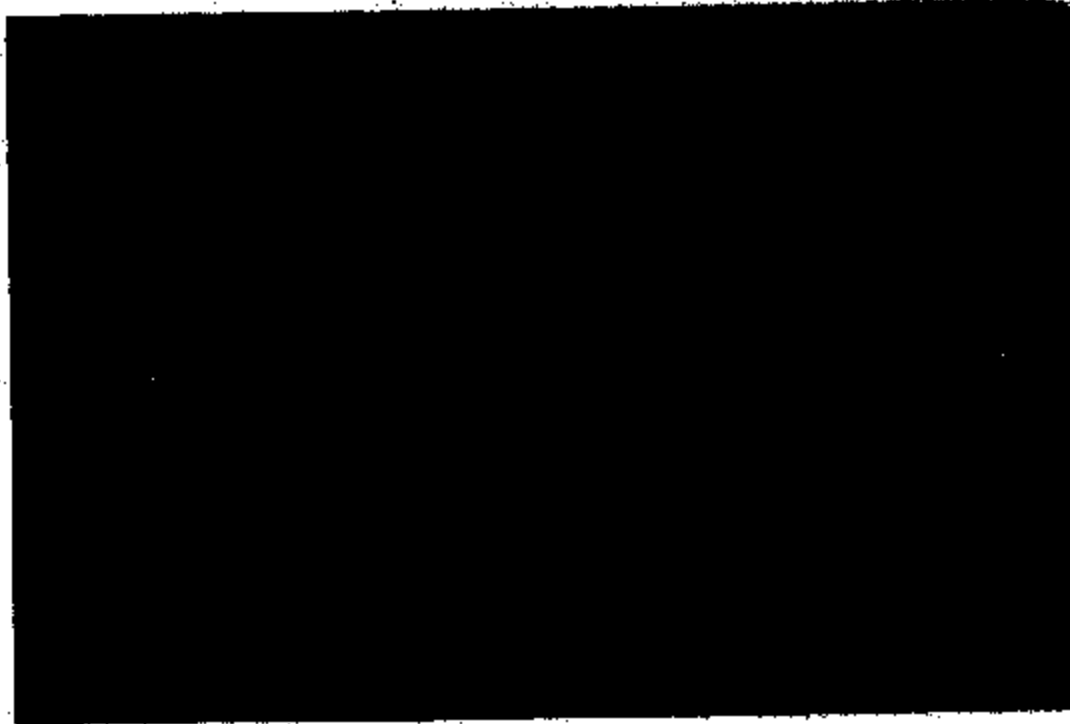
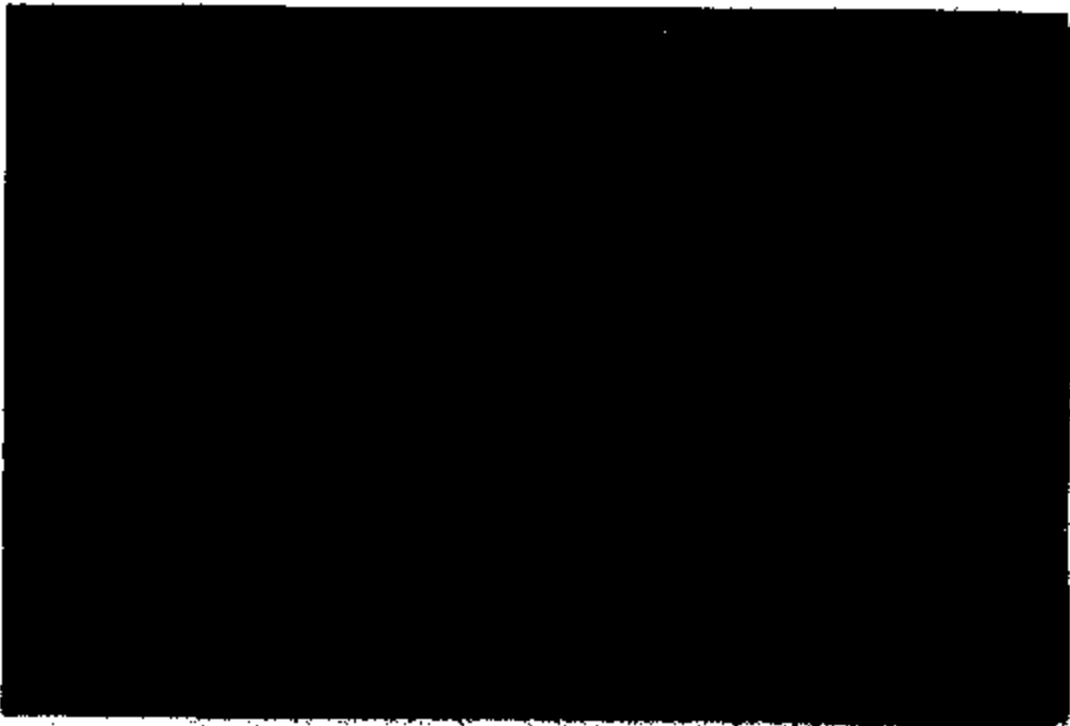


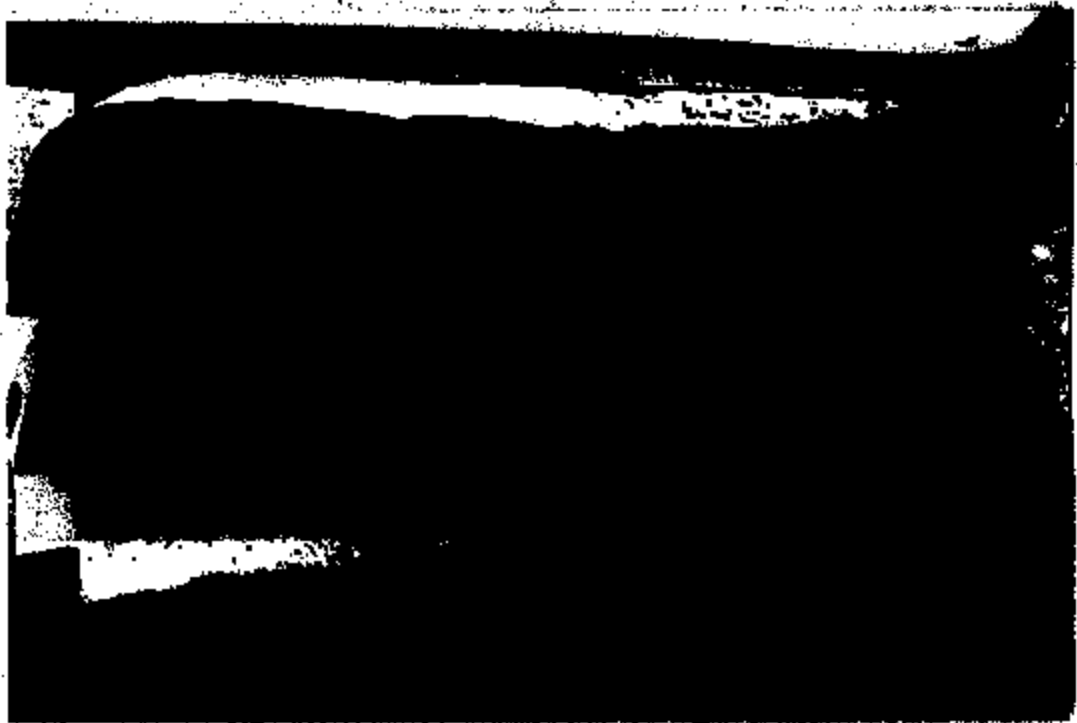


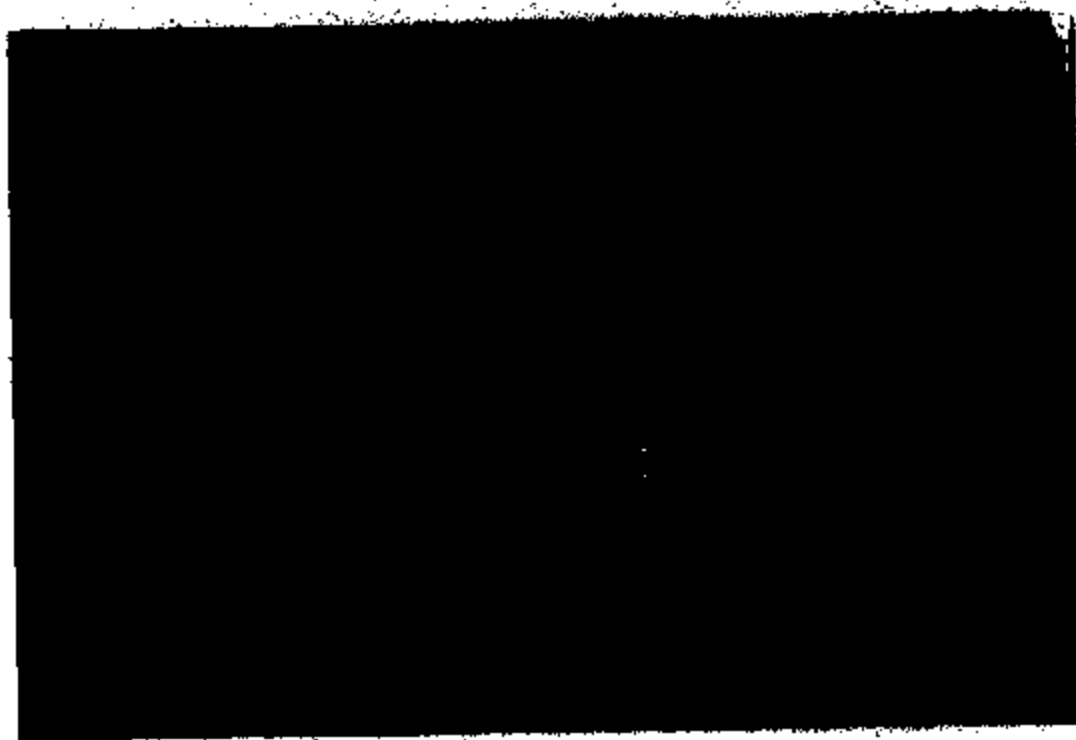
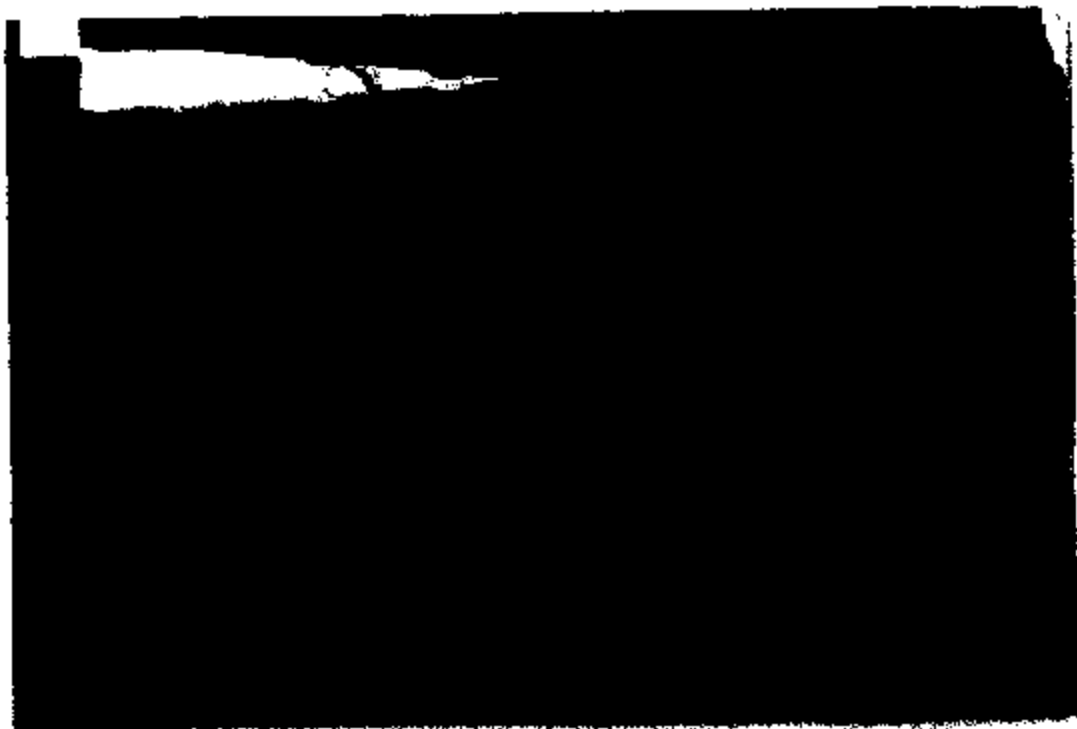


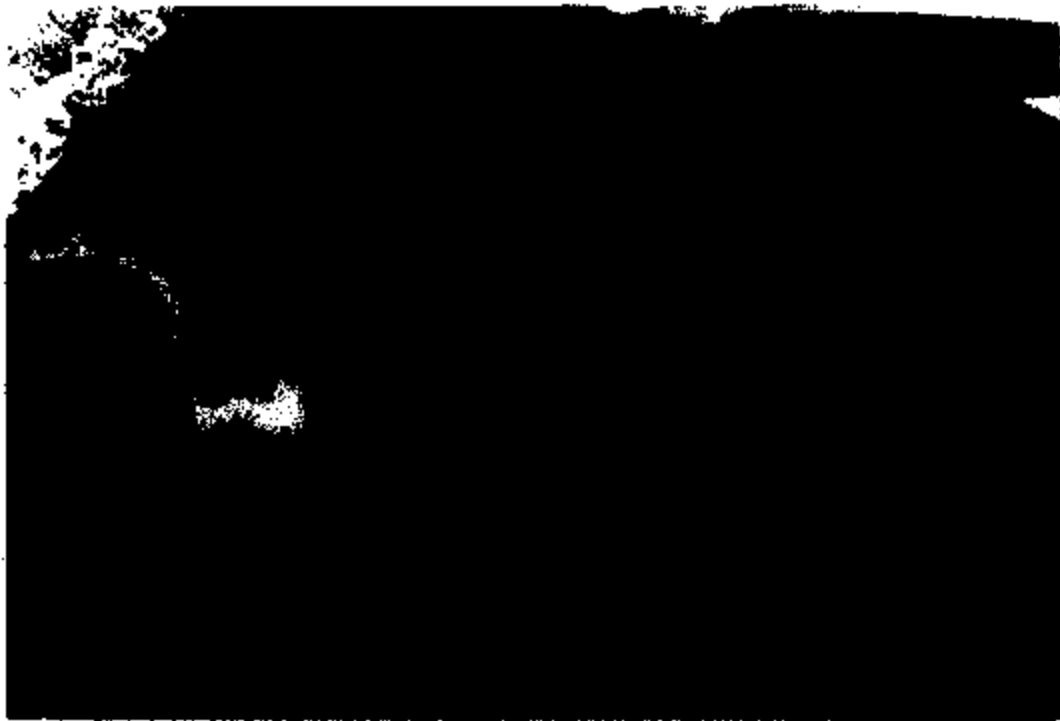


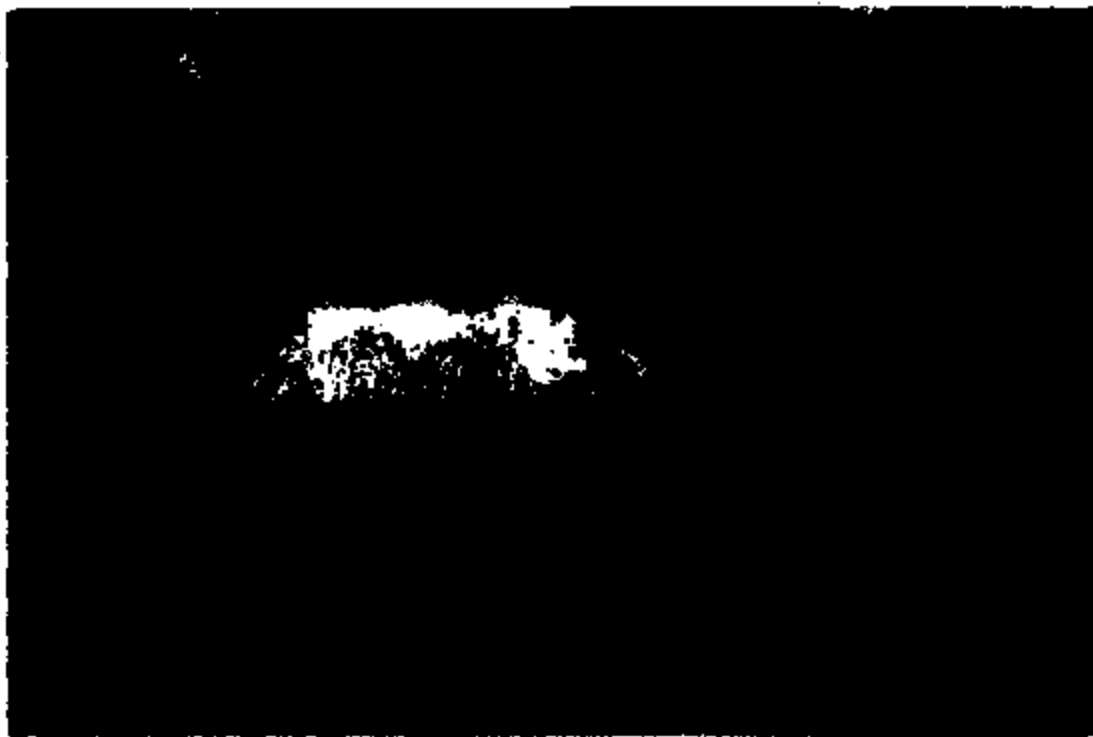






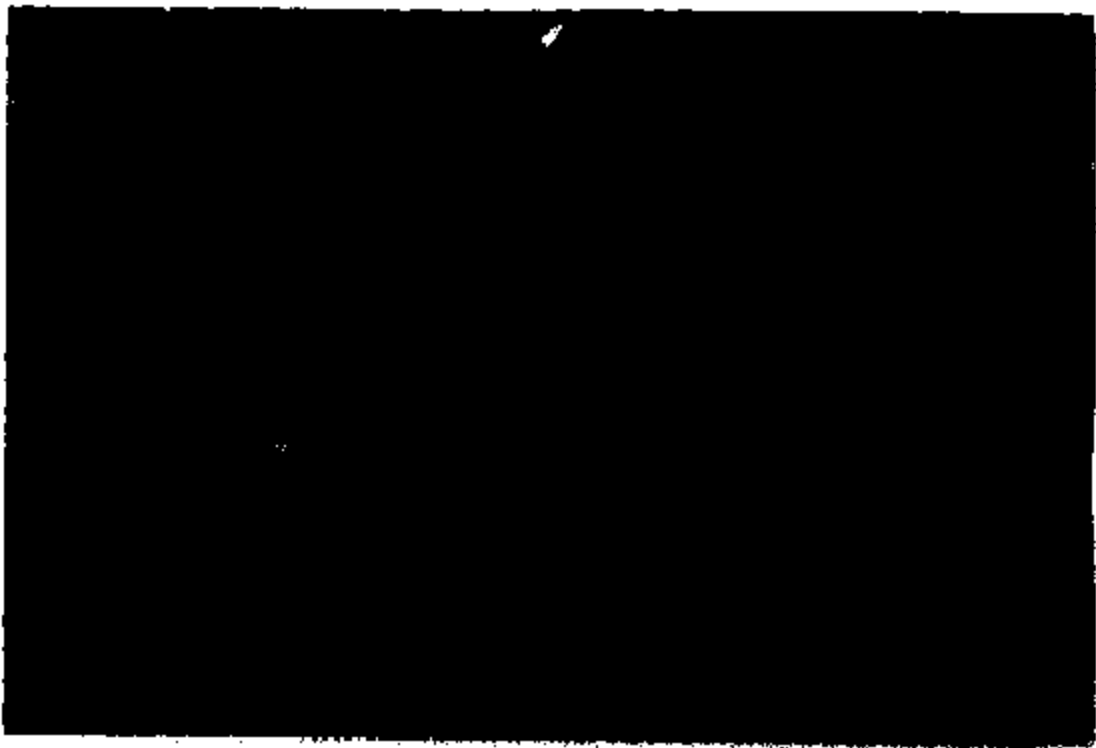


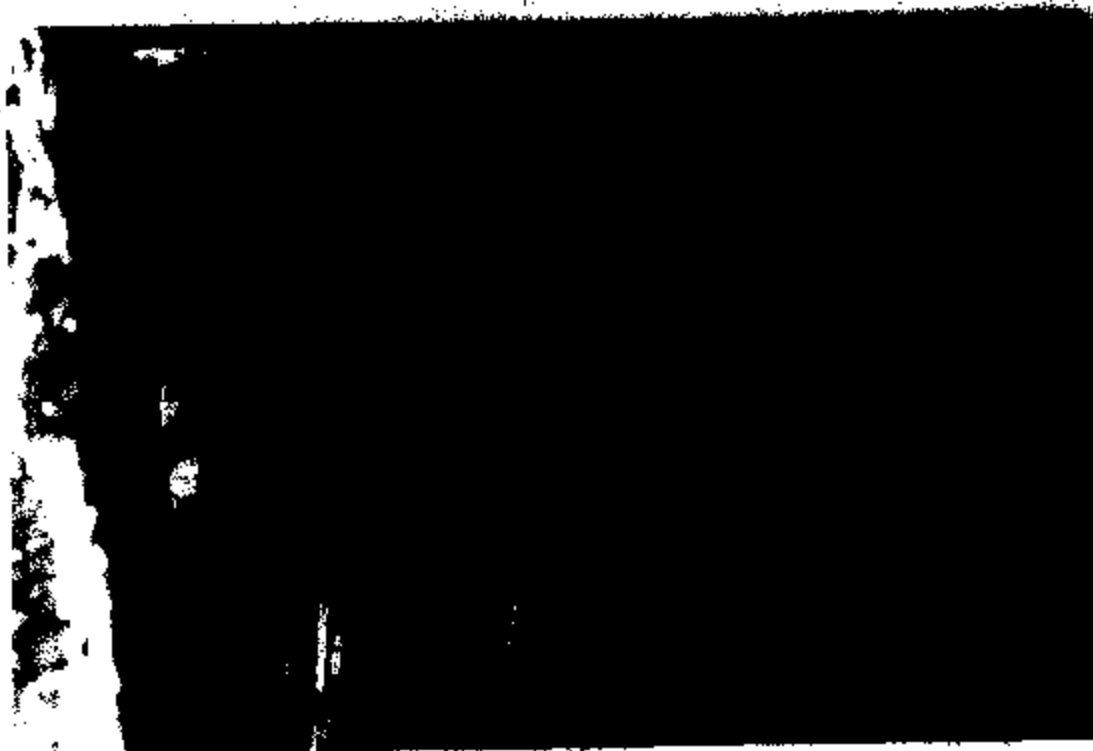
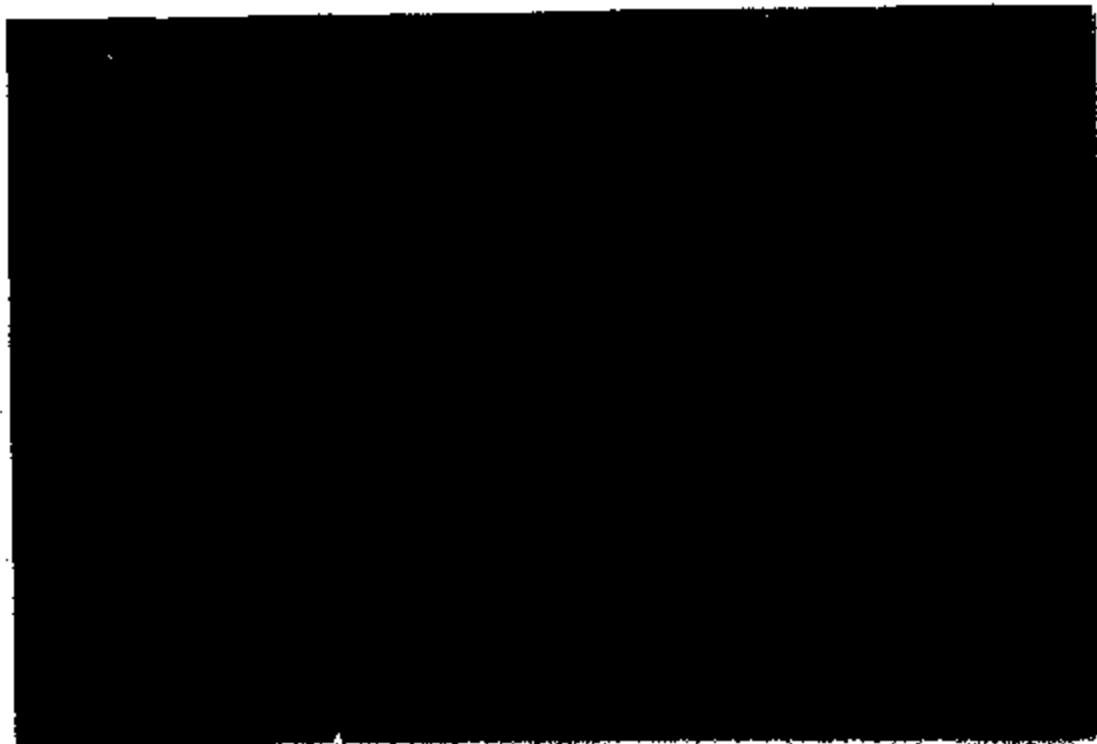


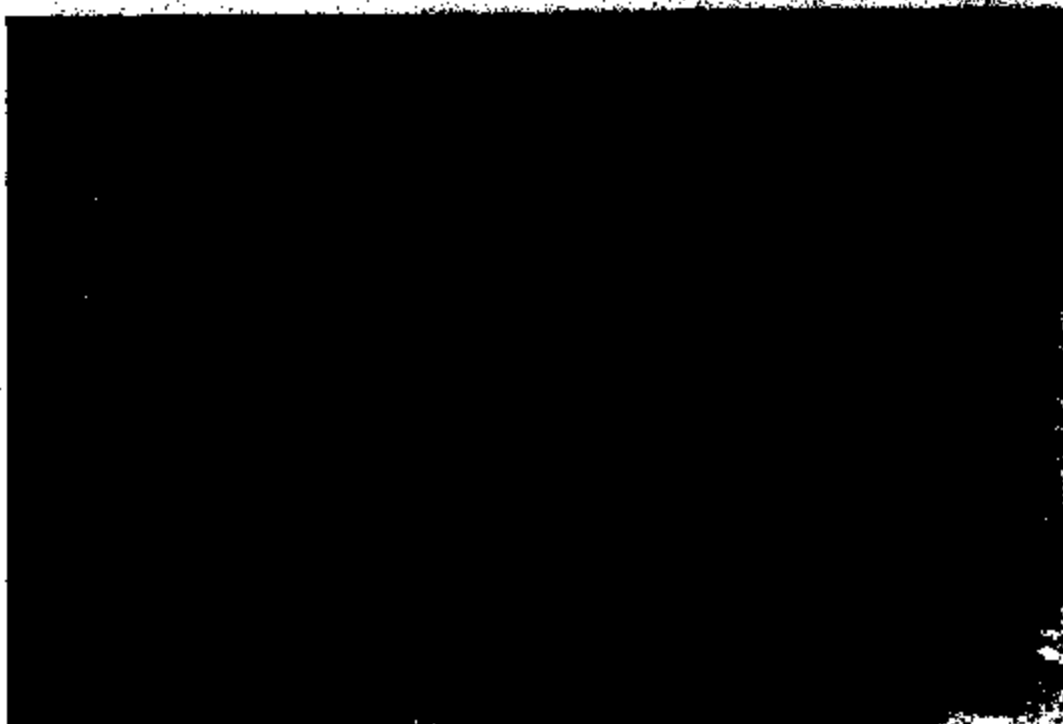












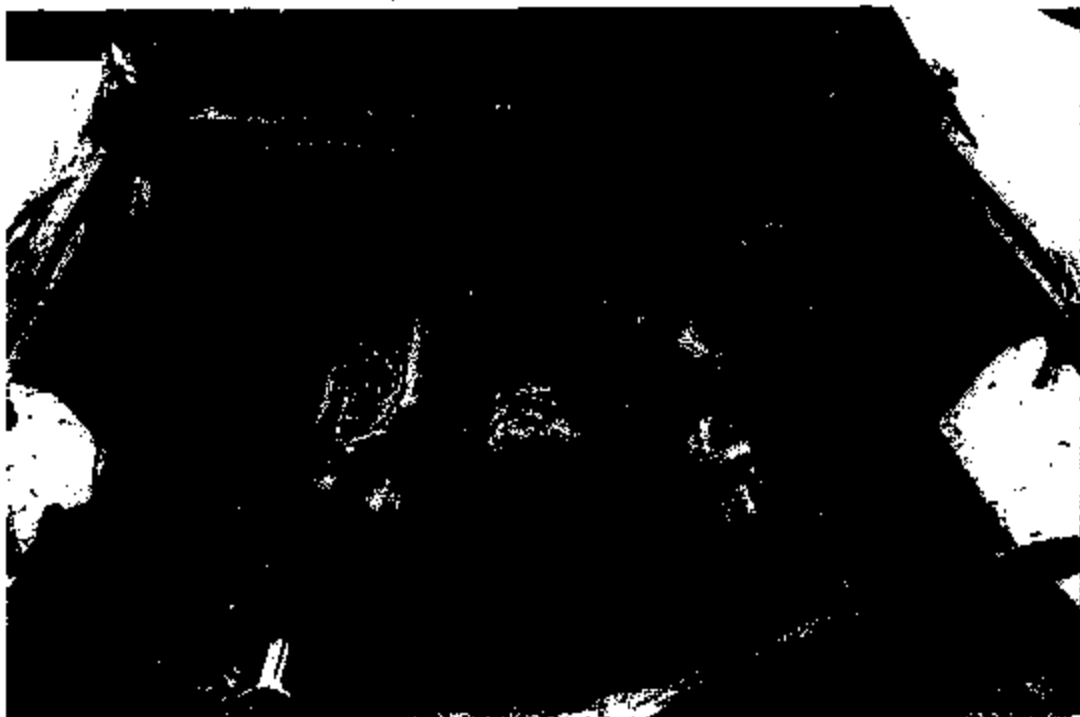


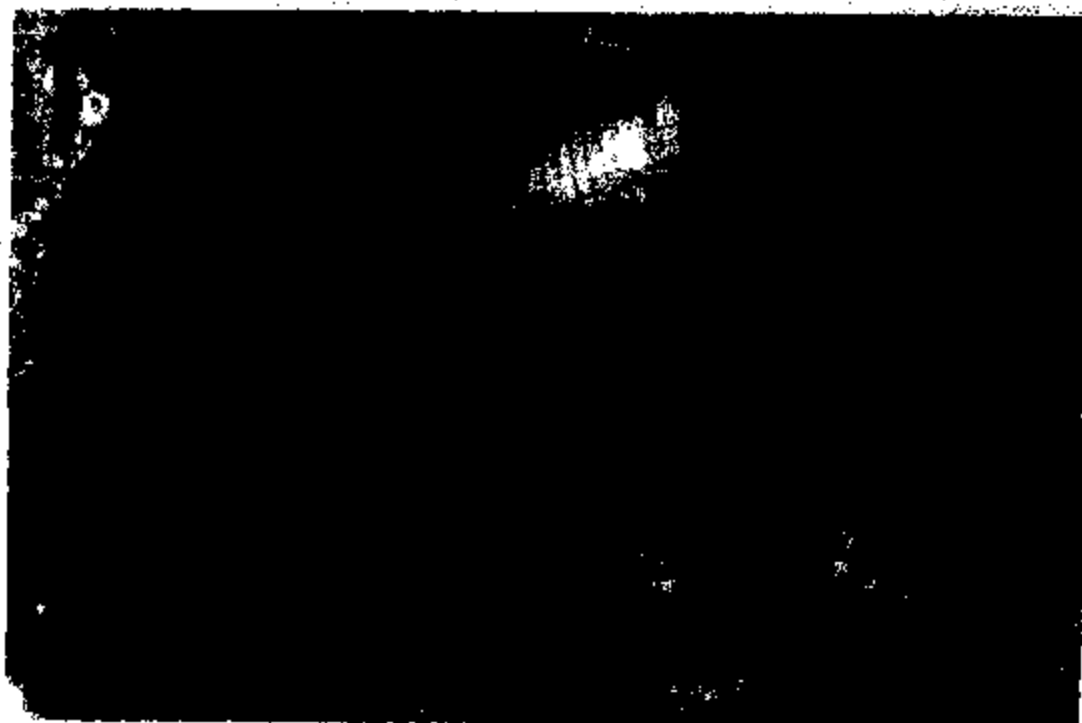




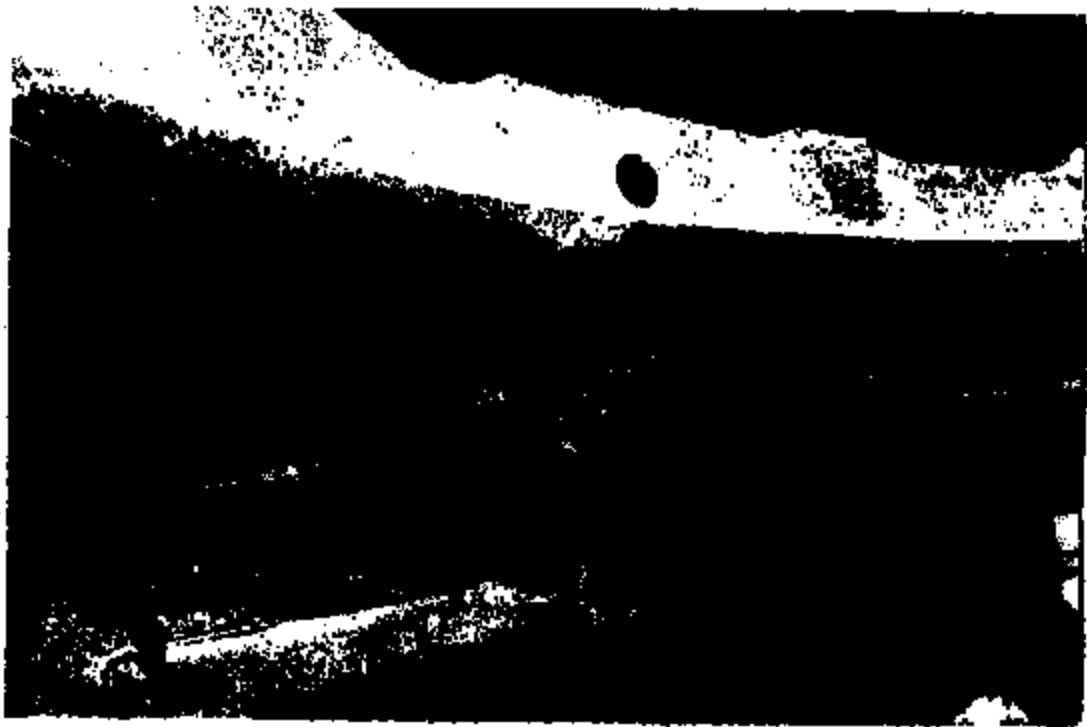


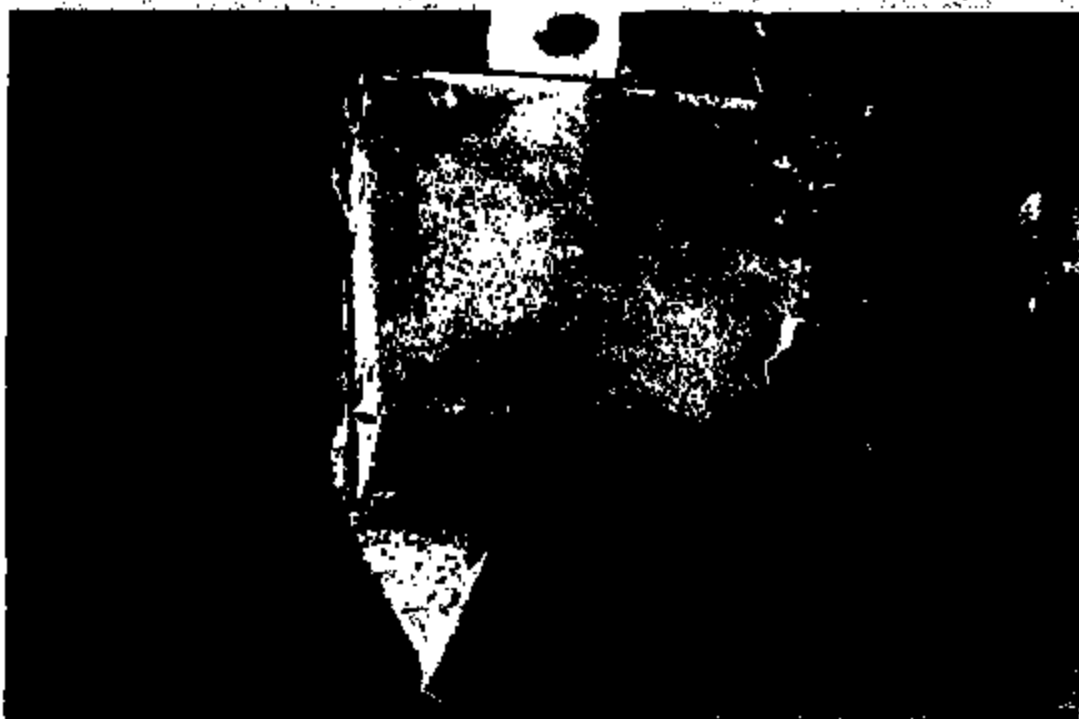
















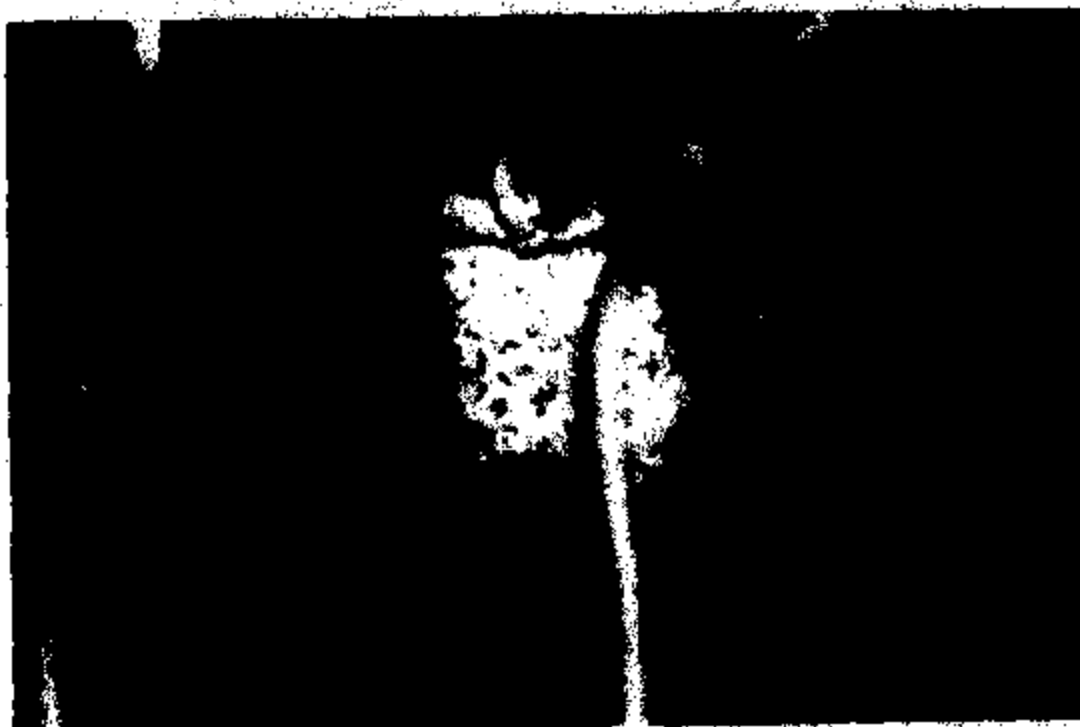
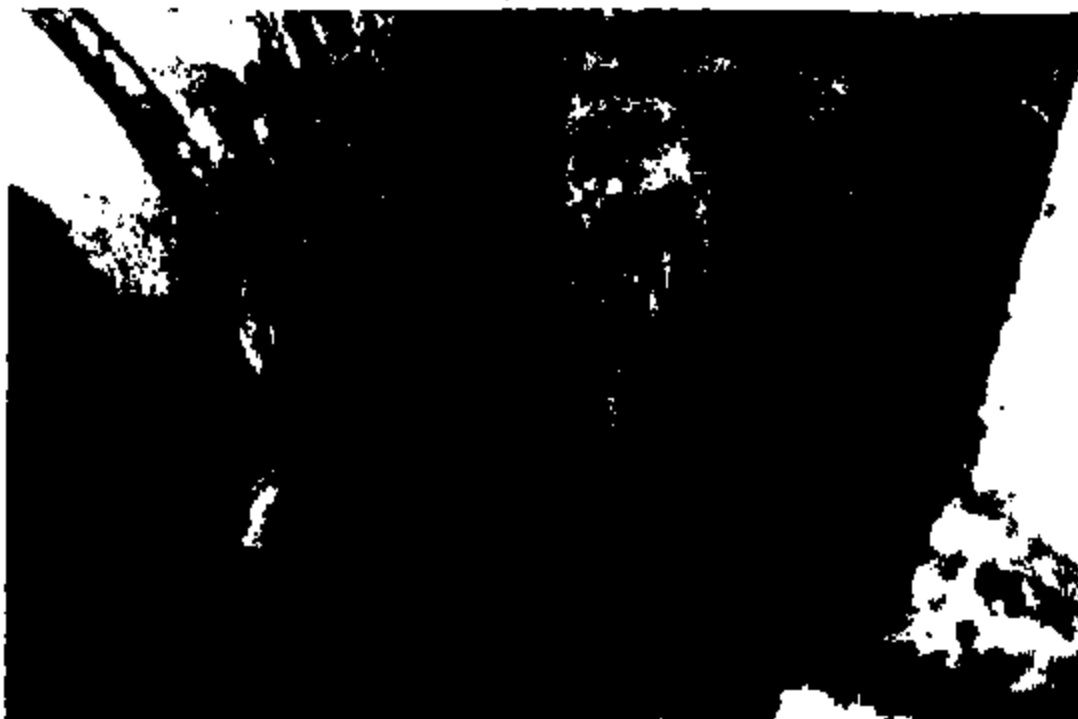


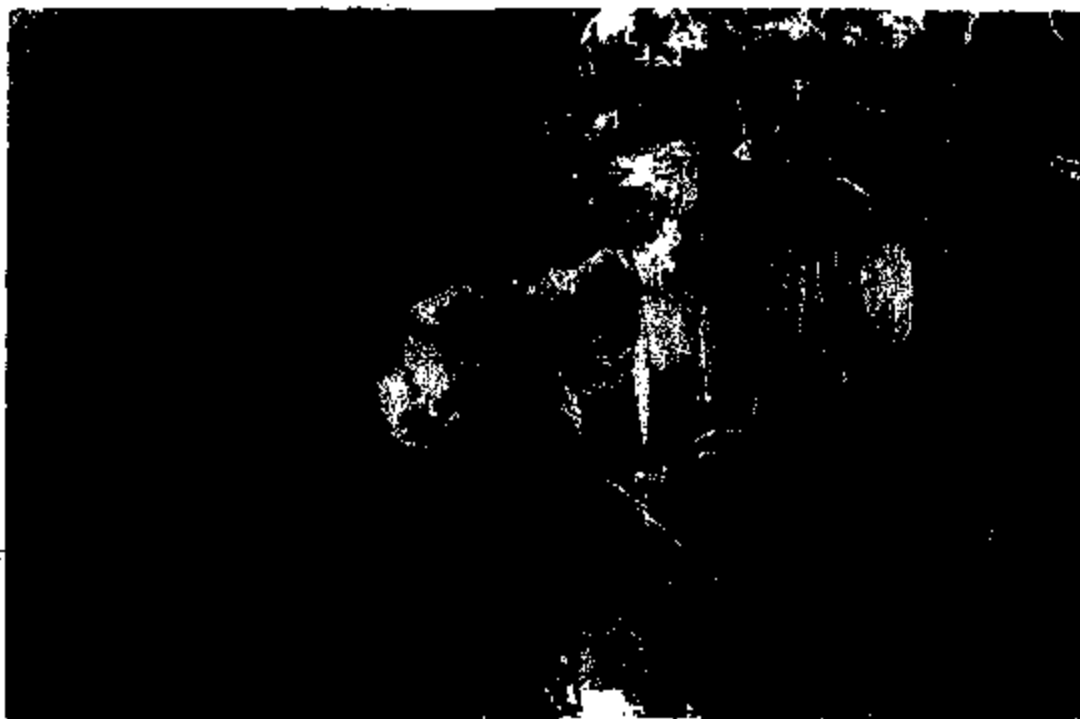


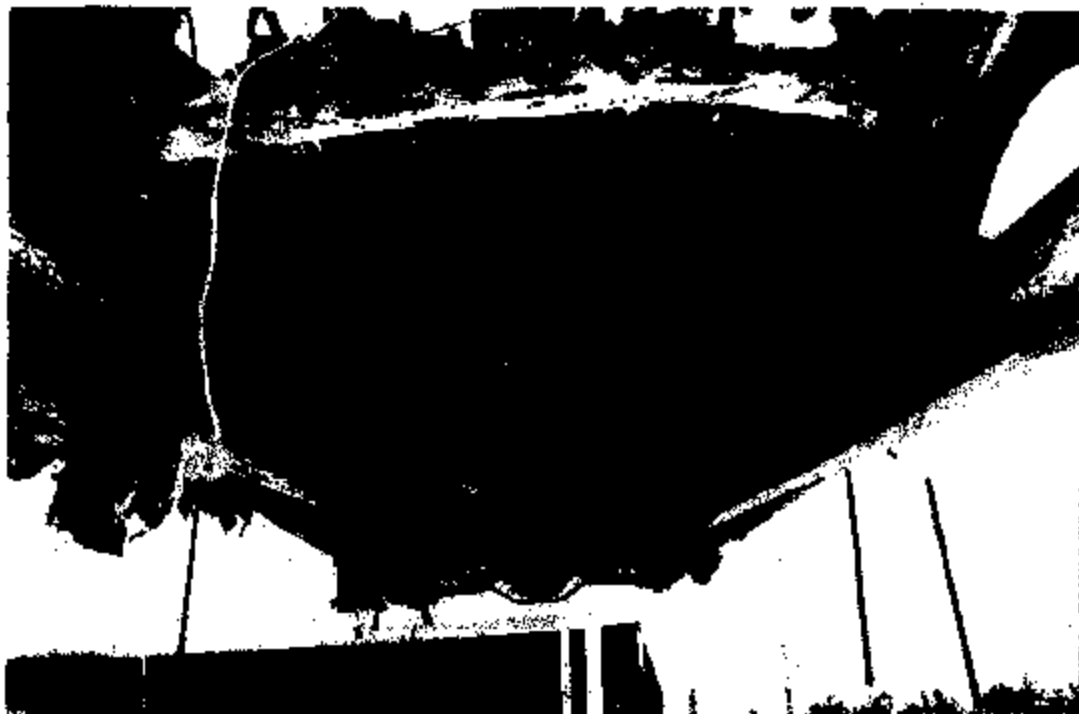


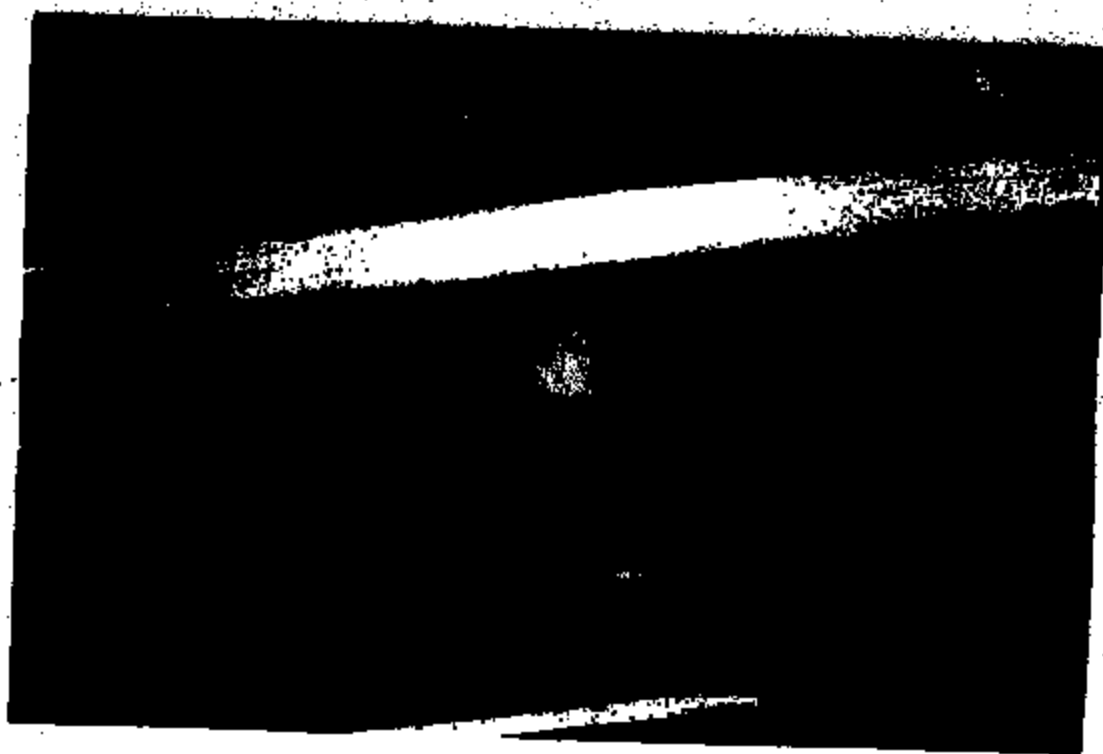










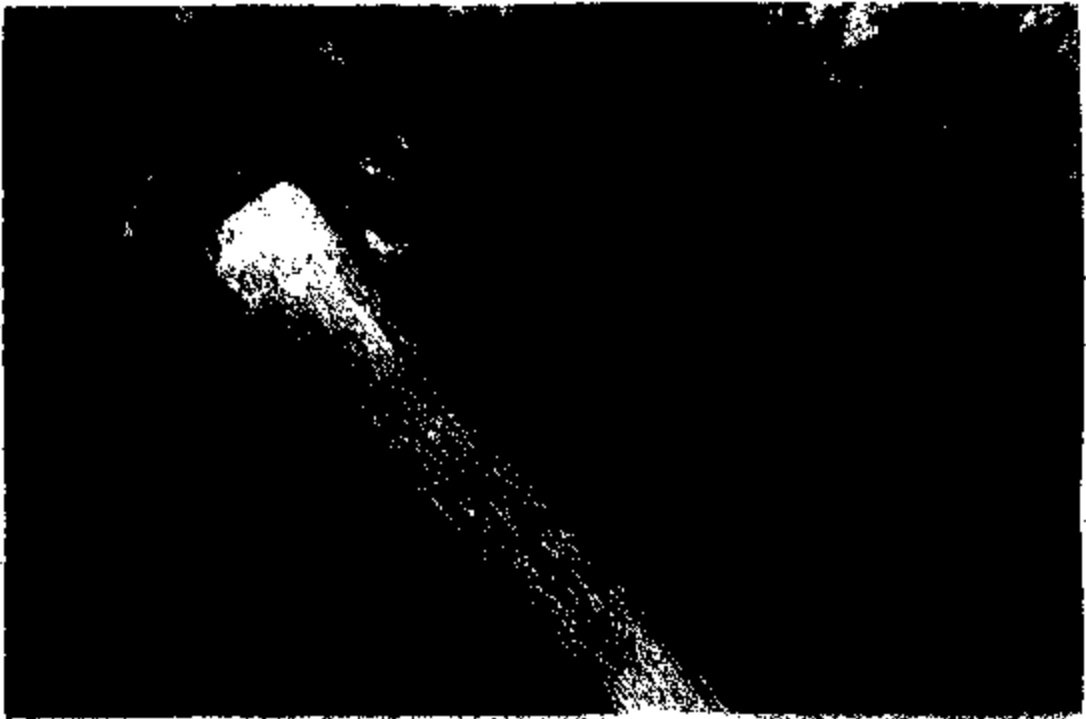


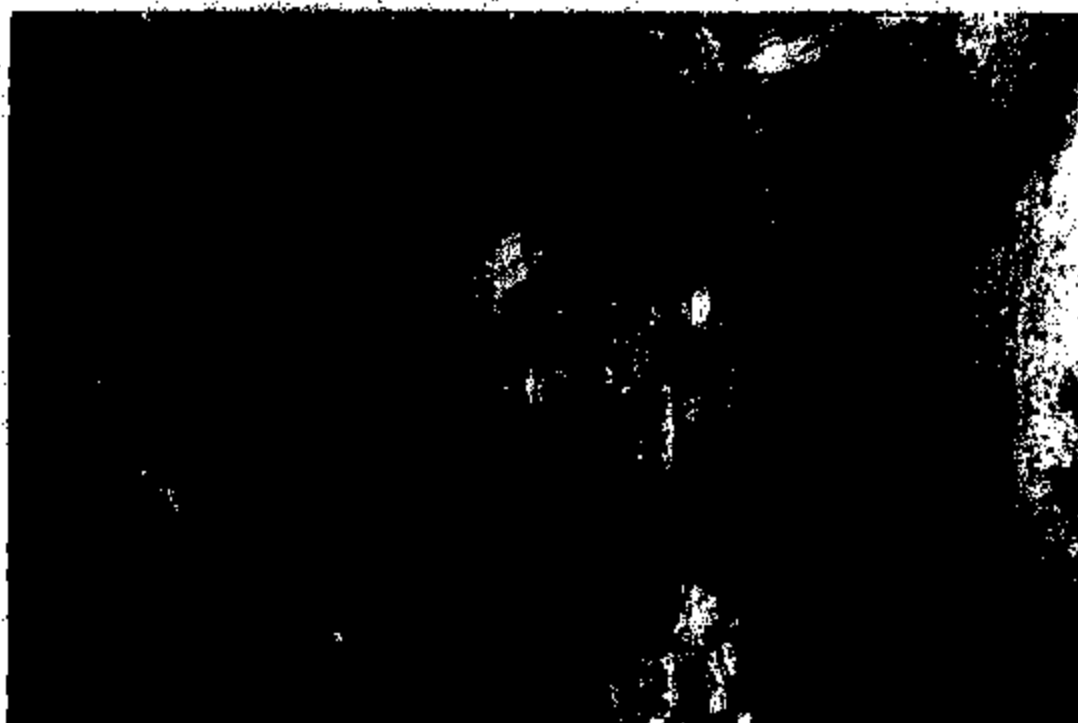
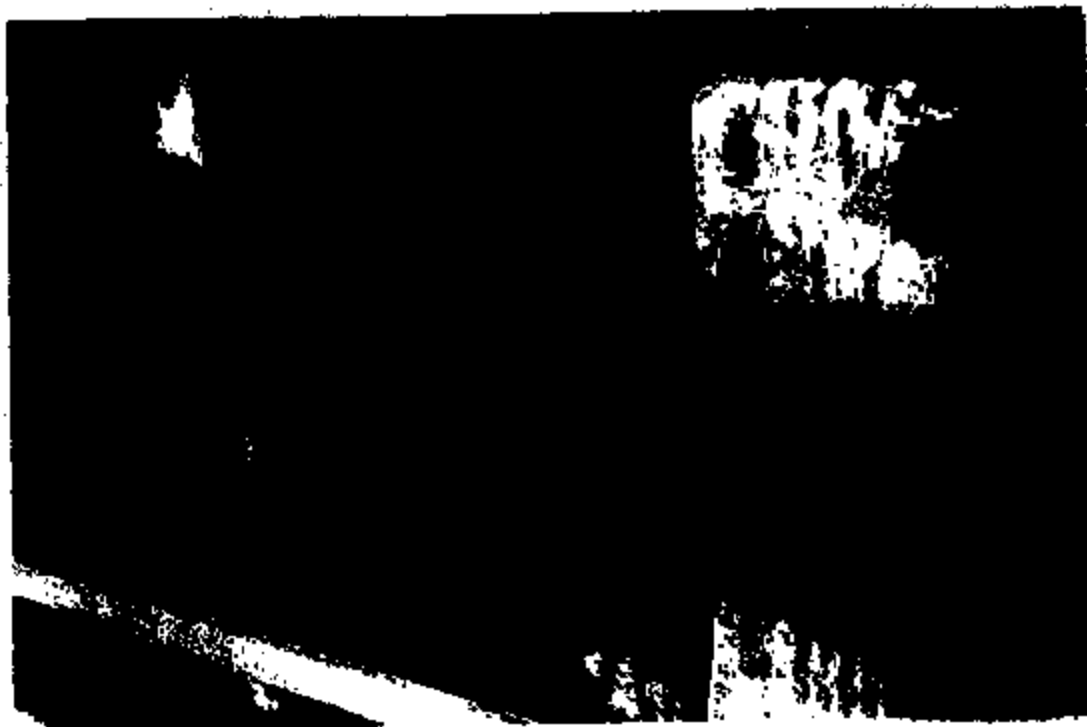
8702-025 31213















**Surrogate for Video:**

**EA02-025 31220**

**Titled:**

**Video of After – Fire Damage**