EA02-025

FORD 10/27/03 LETTER TO ODI

APPENDIX M

BOOK 12 OF 22

PART A-D

PART B

[redacted]

SHORTONL
OH

[redacted]

Ford Motor Company

Office of the General Counsel

Ford Motor Company
3 Parklane Boulevard
Parklane Towers West, Suite 309
Dearborn, Michigan 48126-2568

August 28, 2002

Steven J. Jacobson, P.A.
5701 North Pine Island Rd., Suite 320
Fort Lauderdale, FL 33321
ATTENTION: STEVEN JACOBSON

Re: Claimant: [redacted]
D/O/R:
Your Claim #: NA

Dear Mr. Jacobson,

Following a review of the facts and circumstances surrounding this event, Ford Motor Company finds no evidence of a manufacturing or design defect; therefore, we must deny liability for this claim. Additionally, we believe that the Economic Loss Doctrine would prohibit you from any recovery under these circumstances.

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 in the event you elect to litigate this matter. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

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

Sincerely,

Shawn Norton
Claims Analyst

ER62-625 43777

Ford Motor Company

Office of the General Counsel

Ford Motor Company
3 Parklane Boulevard
Parklane Towers West, Suite 330
Dearborn, Michigan 48126-2568

May 23, 2002

Law Offices
Steven J. Jacobson
5701 North Pine Island Road, Suite 320
Fort Lauderdale, FL 33321
ATTENTION: STEVEN J. JACOBSON

Re: Claimant: [redacted]

D/O/E: 08-26-1998 ; 07-24-2001
Your Claim #:Hunter-981900381 [redacted]

Dear Mr. Jacobson,

Following a review of the facts and circumstances surrounding this event, Ford Motor Company finds no evidence of a manufacturing or design defect; therefore, we must deny liability for this claim. Additionally, we believe that the Economic Loss Doctrine would prohibit you from any recovery under these circumstances.

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 in the event you elect to litigate this matter. Ford Motor Company has the right to inspect the vehicle and remove and test any component part that you claim to be defective, and to be presented with the vehicle and the subject component part(s) at the time of trial, should litigation ensue from this informal claim.

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

Sincerely,

Shawn Norton
Claims Analyst

** TX STATUS REPORT ** FR OF MAY 15 2002 11:39 PAGE.01

OSC 408 4097

	DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	JOB	STATUS
02	05/15	11:37	954 728 9582	EC—S	09'32"	001	183	OK

Ford Motor Company

[redacted]

Office of the General Counsel

Ford Motor Company
[redacted]
Suite 800
[redacted]
Dearborn, Michigan [redacted]

May 15, 2002

Law Offices
Steven J. Jacobson, P.A.
5701 North Pine Island Road, Suite 320
Fort Lauderdale, FL 33321
ATTENTION: STEVEN J. JACOBSON

FAX 954/728-9582

Re.: Claimant: [redacted]
DOL: August 28, 1999
DOL: July 24, 2001

Your Claim #: Progressive [redacted]
Progressive [redacted]

Dear Mr. Jacobson:

Thank you for your recently submitted materials dated May 13, 2002. Please be advised that these files were forwarded to our Engineering Department for review. As soon as I hear from them regarding their findings I will contact you with our decision. I recommend a 10 day diary.

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

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

If you have any further questions please contact me at the above indicated address.

Sincerely,

Sharon L. Hutton
Claims Analyst

ER62-625 43779

Ford Motor Company

PRIVILEGED AND CONFIDENTIAL

Office of the General Counsel

Ford Motor Company
Parklane Towers West
Suite 360
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

May 15, 2002

Law Offices
Steven J. Jacobson, P.A.
5701 North Pine Island Road, Suite 320
Fort Lauderdale, FL 33321
ATTENTION: STEVEN J. JACOBSON

FAX 954/720-6962

Re: Claimant: [redacted]

DOL: August 26, 1998
DOL: July 24, 2001

Your Claim #: [redacted]

Dear Mr. Jacobson:

Thank you for your recently submitted materials dated May 13, 2002. Please be advised that these files were forwarded to our Engineering Department for review. As soon as I hear from them regarding their findings I will contact you with our decision. I recommend a 15 day diary.

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

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

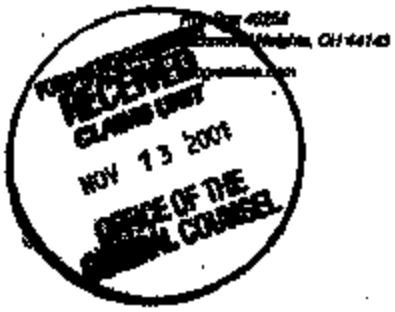
If you have any further questions please contact me at the above indicated address.

Sincerely,

Shawn L. Norton
Claims Analyst

E982-623 43788

PROGRESSIVE



November 6, 2001

Ford Motor Co.
Office of General Counsel
Parklane Towers West, Suite 300
3 Parklane Blvd.
Dearborn, MI 48126-2568

Re:

VIN:	1LNLM82W7PY745577
Year:	1993
Make:	Lincoln
Model:	Townear
Our Insured:	[redacted]
Address:	[redacted] Naples, FL 34112
Phone:	[redacted]
Our Claim No:	016829837
Date of Loss:	7-24-01
Damages:	$5,386.92

REDACTED

Please accept this letter as formal notice of our subrogation rights in regard to the above-captioned claim. Demand is hereby made upon you for payment of Progressive's damages and those of Progressive's insured.

Our investigation indicates damages to our insured's vehicle was a direct result of a manufacturer's defect or negligence on your behalf.

Please acknowledge receipt of my subrogation demand and forward your payment of $5,386.92 to my attention, payable to "Progressive Insurance Company, as subroge of [redacted]", and mail to my attention at PO Box 43258, Richmond Hts., OH 44143.

You can contact me at the number listed below should you need additional documentation or care to discuss this claim.

Thank you for your anticipated cooperation.

PROGRESSIVE INSURANCE COMPANY

William P. Kienzl
Subrogation Representative
(440) 609-5339

REDACTED

5982-82 43782 M

VEHICLE DESCRIPTION	BODY STYLE	ENGINE	ENGINE CALIBRATION
1993 TOWN CAR	4 DR SEDAN SIGNATURE	4.6L SOHC (ROMEO)	318DR11A
TRANSMISSION	**AXLE CODE**		
4 SPD OD AODE	JY		

WARRANTY START DATE	BUILD DATE	START ODOM
05/20/1993	05/05/1993	

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

NO ESP INFORMATION AVAILABLE

NO REPAIR HISTORY ON VEHICLE

END OF OASIS REPORT FOR 1LNLM82W7PY745577

EA02-025 43783

Vehicle Information Report

GENERAL VEHICLE INFORMATION:

(Related Claims)

VIN:	1LNLM82W1PY743377	Veh Line:	C/VB - TOWN CAR (FN36/FN116) [91-97]	Eng Serial No:	W
Model Year:	1993	Market Derivat:	C/M - L-M DIVISION DERIVATIVE	Body Shells	*
Veh Type:	C	Drive Code:	C/B - 2 WHL L/H REAR DRIVE	Engine:	C/VN - R-44 4.6L SOHC EFI NA
Inv. Dealer:	09037	Body Cab Style:	C/TC - 4 DOOR SEDAN-4 LITE	Transmission:	C/DK - 4 SPD AUTO TRANS NA
		Version/Series:	C/SR - SIGNATURE VERSION		

BUILD INFORMATION:

Region:	NA - [illegible]	Plant:	BA - WIXOM PLANT BUILD
Country:	USA - [illegible]	Prod Date:	15-MAY-1993

SALE INFORMATION:

Region:	NA - [illegible]	Selling Dealer:	143741 - *
Country:	USA - [illegible]	Selling Dlr St/Prov:	MI
		Buyer St/Prov:	OK

Arrival Date:	14-MAY-1993	Red Carpet Lease:	*		
Sale Date:	20-MAY-1993	Fleet/Retail/Co. Lease:	F		
Warranty Start Date:	20-MAY-1993	Modified Vehicle:	*		
Orig Warranty Date:	20-MAY-1993	Reacquired Vehicle:	*	Vehicle Export Flag:	N

VOC/EOC:

---------1---------2---------3---------4---------5---------6---------7---------8---------9---------0

[illegible] 4L [illegible] PC F 1 [illegible] 2P 4 [illegible] P [illegible] [illegible] [illegible] [illegible] [illegible]

[illegible] [illegible] A

EA02-025 42784

INSTALLED OPTION INFORMATION:

Air Conditioning:	C/C - ATC AIR CONDITIONER	GVW Code:	-
Alternator Amp Rating:	*	GVW Class Code:	L
Audio Disc:	* - [N/A]	Instrumentation:	AC - ELECTRONIC INSTRUMENTATION
Axle Ratio:	BGACC - 3.06 FINAL DRIVE RATIO	Mirror(Driver Side):	* - [N/A]
Axle Type:	BGJAC - LIMITED SLIP REAR AXLE	Mirror(Psngr Side):	* - [N/A]
Battery Amp Rating:	72	Paint:	PNYCJ - OPAL FROST C/C
Brake Code:	FRAAB - 4 WHL ANTI-LOCK BRAKES	Power Antenna:	* - [N/A]
Brake Code(Service):	* - [N/A]	Radio:	AQ - ELETR PREMIUM AM/FM STRO/CSTE
Calibration Code:	330R11A	Sound System:	* - [N/A]
Color(Accent):	* - [N/A]	Susp Tandem Axle:	* - [N/A]
Color(Trim):	000YD -	Tire Manufacturer:	AJ -
Delivery Type:	H	Tire Brand:	* -
Driveshaft Code:	*	Tire Size:	D3GSP - P215/70R15 WSW
Front Seat:	* - [N/A]	Traction Control:	* - [N/A]
Fuel Type:	* - [N/A]	Wheel Base:	* - [N/A]

TIRE DOT INFORMATION:

LF:	*	RF:	*
LR:	*	RR:	*
Li:	*	Ri:	*
SPARE:	*	DOT Plant Manufacturer:	* - *

ESP INFORMATION: EMISSIONS INFORMATION:

ESP Code:	*	Emission Code:	C/D - C/D
ESP Coverage(Miles):	*	Emission Cert Type:	F
ESP Coverage(Time):	*	Emission Decal Suffix:	DY
ESP Plan Year:	*	Engine Family:	FFM4.6V5FDF2
ESP Signature Date:			

Any comments? You can contact

webmaster

E002-028 43765

STANDARD CLAIMS LIST

AWS Online Report

Run Date: 10-JUN-2002
Note: All Costs are in US Dollars

1LNLM82W7PY745577 VB C/VB C/M C/FC C/SR C/B BA C/DK C/VN 05-05-93 20-05-93 345741 USA 9 Q23 7Z04 FOVY 14A701 A S08 V83 S15 42
AWS Claim Key: 8224584 Doc #: 063645 Trx Code: E70 Labor Hrs: .3 Labor Cost: 13.73 Material Cost: 19.01 Total Cost: 32.74
Dlr Cd-Sub Cd: 10062-* Name: HERITAGE LINCOLN-MERCURY Ph: 864-2346400 St: SC Ctry Cd: USA Reg Cd: NA Repr Date:25-JAN-1994 DIST(Mile):20598
Cust Comments: DRIVERS SEAT WILL NOT ADJUST PROPERLY
Tech Comments: SWITCH ASSY INOP

1LNLM82W7PY745577 VB C/VB C/M C/FC C/SR C/B BA C/DK C/VN 05-05-93 20-05-93 345741 USA 12 Q20 6C01 * 731790 * S08 V74 T99 04
AWS Claim Key: 8284506 Doc #: 067744 Trx Code: E84 Labor Hrs: .4 Labor Cost: 18.3 Material Cost: 4.21 Total Cost: 22.51
Dlr Cd-Sub Cd: 10062-* Name: HERITAGE LINCOLN-MERCURY Ph: 864-2346400 St: SC Ctry Cd: USA Reg Cd: NA Repr Date:09-MAY-1994 DIST(Mile):25164
Cust Comments: CARPET LOOSE BOTH REAR QTRS.
Tech Comments: CARPET BOTH QUARTER PANELS BOND FAILURE-REGLUE CARPET

1LNLM82W7PY745577 VB C/VB C/M C/FC C/SR C/B BA C/DK C/VN 05-05-93 20-05-93 345741 USA 13 T05 2E03 * 9F715 * S11 V49 N11 08
AWS Claim Key: 8284505 Doc #: 534011 Trx Code: 807 Labor Hrs: .9 Labor Cost: 37.4 Material Cost: 42.51 Total Cost: 79.91
Dlr Cd-Sub Cd: 00945-* Name: BOB HARRIS FORD L-M INC Ph: 803-5273461 St: SC Ctry Cd: USA Reg Cd: NA Repr Date:02-JUN-1994 DIST(Mile):26476
Cust Comments: CHECK HUMMING NOISE ON DECCELERATION AND JERKING FROM 57 MPH
Tech Comments: SBDS TESTYED CODES CLEAR FOUND AIR BYPASS VALVE MAKING NOISE REPLACED VALVE AND RECHECK GOOD

1LNLM82W7PY745577 VB C/VB C/M C/FC C/SR C/B BA C/DK C/VN 05-05-93 20-05-93 345741 USA 17 T09 2A01 PSAZ 9H308 A S11 V49 N11 08
AWS Claim Key: 11764510 Doc #: 077140 Trx Code: 807 Labor Hrs: .3 Labor Cost: 14.14 Material Cost: 6.29 Total Cost: 20.43
Dlr Cd-Sub Cd: 10062-* Name: HERITAGE LINCOLN-MERCURY Ph: 864-2346400 St: SC Ctry Cd: USA Reg Cd: NA Repr Date:03-OCT-1994 DIST(Mile):1
Cust Comments: NOISE UNDER HOOD
Tech Comments: REPAIRED PER SER MSG 8676

1LNLM82W7PY745577 VB C/VB C/M C/FC C/SR C/B BA C/DK C/VN 05-05-93 20-05-93 345741 USA 17 Q23 6B06 FOOY 5461748 A S08 V03 S10 01
AWS Claim Key: 11764508 Doc #: 077140 Trx Code: E84 Labor Hrs: .8 Labor Cost: 37.7 Material Cost: 13.15 Total Cost: 50.85
Dlr Cd-Sub Cd: 10062-* Name: HERITAGE LINCOLN-MERCURY Ph: 864-2346400 St: SC Ctry Cd: USA Reg Cd: NA Repr Date:03-OCT-1994 DIST(Mile):1

Cust Comments: BOTH DRIVER SEAT TRACK COVERS WILL NOT STAY ATTACHED
Tech Comments: PAINT AND REPLACE BROKEN COVERS

1LNLM82W7PY745577 VB C/VB C/M C/FC C/BR C/B BA C/DK C/VN 05-05-93 20-05-93 345741 USA 17 Q42 7D02 F5VY 13404 A SXX V99 A59 01
AWS Claim Key: 11264589 Doc #: 077140 Trx Code: B04 Labor Hrs: .6 Labor Cost: 28.27 Material Cost: 94.06 Total Cost: 122.33
Dlr Cd-Sub Cd: 10062-* Name: HERITAGE LINCOLN-MERCURY Ph: 864-2346400 St: SC Ctry Cd: USA Reg Cd: NA Repr Date:03-OCT-1994 DIST(Mile):1
Cust Comments: GASKET PULLING OUT AT RIGHT REAR SIGNAL LENSE
Tech Comments: REAR LENS GSKET BROKEN

1LNLM82W7PY745577 VB C/VB C/M C/FC C/BR C/B BA C/DK C/VN 05-05-93 20-05-93 345741 USA 17 T10 3A11 * 7003 * 811 V48 P66 49
AWS Claim Key: 11264511 Doc #: 077438 Trx Code: E70 Labor Hrs: 2 Labor Cost: 94.24 Material Cost: 85.56 Total Cost: 179.8
Dlr Cd-Sub Cd: 10062-* Name: HERITAGE LINCOLN-MERCURY Ph: 864-2346400 St: SC Ctry Cd: USA Reg Cd: NA Repr Date:07-OCT-1994 DIST(Mile):31201
Cust Comments: SHIFTS ROUGH (WASHBOARD EFFECT)
Tech Comments: REPAIRED PER BULL 94-14-08 AND SER MESSAGE E305

Any comments? You can contact

webmaster

```
CSCM140                          VEHICLE DATA                    06/10/02 07:35:27
==>
  ENTER  VIN ==> 1LNLM82W7PY745577
  NAME ==>[redacted]                    ZIP ==>[redacted]  MODEL YR ==>
  OWNER NAME  :[redacted]
  STREET ADDR :[redacted]

  CITY          : GREENVILLE                              N/A YY-MM-DD 96-02-08
  ST/PRV: SC  CTRY:                  ZIP/POSTAL CODE:[redacted]  N/A SOURCE: P
  MODEL YEAR    : 93      PLANT: Y                        SALE YY-MM-DD 93-05-20
  BODY STYLE DESC: 4 DR SEDAN SIGNATURE          PRODUCTION YY-MM-DD 93-05-05
  VEHICLE DESC  : 1993 TOWN CAR
                 DIVISION   DISTRICT    ZONE   DEALER  PDC CODE  FCSD REGION
  SHIP-TO           3          88         A     925        45          CC
  FACING            3          45         F     741
  RESPONSIBLE       3          26         F     192

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

F1=INQUIRY  F3=EXIT  F4=G160  F5=G150  F8=CONTINUE SEARCH  F9=G130
                                                                  OGDB166
```

```
CSCN150              CAMPAIGN VEHICLE INFORMATION              06/10/02 07:35:30
==>

ENTER CAMPAIGN NUMBER==> 96L12    VIN==> 1LNLM82W7PY745577  TYPE OF SEARCH: A
MODEL YEAR: 93 DEFECT: PASS AIR BAG BODY STYLE: 4 DR SEDAN SIGNATURE
   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 M/A INFORMATION;
   RESP DEALER INFORMATION:     NEW:                         IND:   MATCH CODE: 4
     CURRENT: 3 26 192 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                                        OGDB166
```

```
CSCN130                  NOTIFICATION RECIPIENT HISTORY          06/10/02 07:35:32
==>

ENTER CAMPAIGN NBR ==> 96L12     VIN ==> 1LNLM82W7PY745577
  DEFECT        : PASS AIR BAG   BODY STYLE DESC: 4 DR SEDAN SIGNATURE
  RESP DEALER   : 326192              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     : [redacted]                                  INITIALS: WS
  STREET ADDR1  : [redacted]
        ADDR2   :                                             ST/PRV: SC
  CITY          : GREENVILLE                            CTRY:
  ZIP/POSTAL CODE:[redacted]   N-A SOURCE:  P N-A EFF DATE: 96-02-08 YY-MM-DD
**********************************************************************
  RESP DEALER   :                     BEGINNING MAILED DATE:          YY-MM-DD
  RELEASE DESC  :                     ENDING MAILED DATE   :  ..      YY-MM-DD
  CAMPAIGN DIV  :                 FLEET CODE:         FLEET MGMT LOC CODE:
  LAST NAME     :                                             INITIALS:
  STREET ADDR1  :
        ADDR2   :                                             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
I048-LAST PAGE                                                      OGDB166
```

RICHARD SCHWARTZ INVESTIGATIONS INC.

RSIS Investigative Engineering Inc.
4600 S.W. 64th Avenue Suite 107
Davie, FL 33314
(954) 327-8901 • 1-800-FIRE-103 • Tele Fax (954) 327-8908

PROGRESSIVE
SEP 07 2001
FT. MYERS

Attn: Donna Perkins, Claims Adjuster
PROGRESSIVE INSURANCE COMPANY
4200 Cleveland Avenue, #C3
Fort Myers, FL 33907

RE: Insured: [redacted]
1993 Lincoln Town Car
Claim No.: [redacted]
Date of Loss: 07-24-01
Our File No.: 01-2048

FIRE INVESTIGATION REPORT

Date of Report: September 4, 2001

Lead Investigator: Richard M. Schwartz, CFEI, CFEII
Florida Licensed Investigator #C8600879

Investigator: Steven G. Lowman Jr., CFEI #6732-2353
Florida Licensed Investigator #C9900465

Table of Contents

I. Origin and Cause Report

RICHARD SCHWARTZ INVESTIGATIONS INC.

RMS Investigative Engineering Inc.
4800 S.W. 64th Avenue Suite 107
Davie, FL 33314
(954) 327-9009 • 1-800-FIRE-183 • Tele Fax (954) 327-9966
http://www.rsifire.com e-mail: rsifire@aol.com

Ms. Deana Perkins, Claims Adjuster
PROGRESSIVE INSURANCE COMPANY
4300 Cleveland Avenue, #C3
Fort Myers, FL 33907

RE: Insured: [redacted]
1993 Lincoln Town Car
Claim No.: [redacted]
Date of Loss: 07-24-01
Our File No.: 01-2048

September 4, 2001

Dear Ms. Perkins:

PURPOSE OF THE ASSIGNMENT

We received the assignment to inspect the 1993 Lincoln passenger automobile to determine the origin and cause for the fire occurrence. The assignment included instructions to issue a written report detailing our inspection findings.

The following are the results of our inspection:

PRELIMINARY REMARKS

The assignment was received on August 16th, 2001. An inspection of the subject vehicle was conducted on August 16th, 2001 at Auto Pride of Naples Body Shop, 4241 Corporate Square, Naples, FL 34104. The body shop manager showed up to the vehicle.

DESCRIPTION OF THE VEHICLE

The vehicle is described as a:

1993 Lincoln Town Car
4-door passenger automobile
Color: White
Vehicle Identification No.: 1LNLM82W7PY745577

Insured: [redacted]
Our File:

It should be noted that a partial vehicle identification number could be read from the identification plate remains that were on the windshield cowling. There was no license tag on the vehicle at the time of our inspection.

An additional sticker was found on the rear trunk lid indicating that the car had been purchased from Classic Cars of Naples.

INSPECTION OF THE EXTERIOR

Inspection of the exterior of the vehicle revealed this vehicle was equipped with front and rear metal bumpers. The vehicle was also equipped with an electric powered radio antenna that was located on the left rear quarter panel.

The fuel filler neck is located on the left rear quarter panel and was not damaged from the fire occurrence.

Continued examinations made of the exterior of the vehicle revealed the vehicle was equipped with left and right side view mirrors that were attached to each of the front passenger compartment door openings. The roof was constructed of normal roof materials with no sunroof noted.

The vehicle was equipped with four tires and wheels at the time of the fire occurrence. At the time of our inspection the two front tires had been almost totally consumed with the exception of a portion of the tire beds that would have remained underneath each of the front wheel rims. The front right wheel and the left front wheel remains exhibited of a greater degree of heat induced damage to the interior portion of the rim. Both of the rear tires and rims were undamaged from the fire occurrence.

Overall observations made of the exterior of the vehicle indicate fire patterns emanated from the left rear quadrant of the engine compartment and firewall area, including the dashboard area on the opposite side of the firewall. Fire patterns indicate an avenue of travel, from this area of origin, communicating laterally into the remainder of the vehicle.

INSPECTION OF THE INTERIOR

Inspection of the interior of the vehicle revealed that it was constructed with a full powered split bench seat with individual controls located on each side of the vehicle. The rear seat was a full bench style seat. The vehicle was equipped with a driver's side airbag and an automatic transmission that utilized a column mounted shift lever.

Examinations of the dashboard area revealed that it was heavily damaged in the fire occurrence. The resulting damage had consumed almost all of the dashboard area.

Additional examinations made within the interior of the automobile revealed that it was equipped with standard powered windows on all four-door openings. The vehicle was also equipped with factory air conditioning, a tilt steering wheel, cruise control and an AM/FM stereo radio. The vehicle was also equipped with carpet and pad on the floor.

Examinations made of the interior of the passenger compartment revealed fire patterns emanated from the driver's side of the vehicle in the area of the dashboard. Close examinations revealed a high amount of heat damage occurred on the inside of the dash in the area of the steering column and dashboard juncture.

ENGINE COMPARTMENT

Inspection of the engine compartment revealed that the vehicle was equipped with an 8-cylinder fuel injected engine. The transmission fluid and engine oils were both noted to be full. The brake fluid and power steering fluid reservoirs had been consumed during the occurrence and therefore were unable to be checked. The battery for the vehicle was located in the right front corner of the engine compartment. The remains of the battery were heavily damaged by heat from the fire occurrence.

Continued observations made of the engine compartment revealed the transmission, air conditioning compressor, the vehicle's radiator, power steering pump and alternator were all present although heavily damaged during the fire occurrence. The vehicle's fan belt was not present but would have been consumed during the occurrence.

OTHER RELEVANT INFORMATION

Information provided to this firm indicated that the insured had recently installed shocks on the front and rear of the vehicle, as well as front brakes and had had all four tires rotated and balanced. This work was reportedly done on June 11th, 2001.

No other mechanical history was provided other than the vehicle had purportedly been parked at the insured's residence in the carport for a period estimated to be a minimum of 18 hours prior to discovery of the fire occurrence.

Insured: [redacted]
Our File: [redacted]

CONCLUSION

Based upon our inspection and investigation, it is the opinion of this investigator that the fire occurrence is the result of an electrical malfunction within the dashboard area of the vehicle in the area where the steering column joins the dashboard assembly. Fire patterns indicate an avenue of travel from this area of origin laterally into the engine compartment and into the remainder of the passenger compartment.

II. Photographic Documentation

Photograph #1: View of the right side of the vehicle.

Photograph #2: View of the left side of the vehicle.

Photograph #3: View of the rear of the vehicle.

Photograph #4: Close-up view of the Classic Car of Naples label.

Photograph #5: View of the interior of the trunk.

Photograph #6: View of the left side of the vehicle.

Photograph #7: View of the engine compartment.

Photograph #8: View of the engine compartment taken from the left side.

Photograph #9: Another view of the left side of the engine compartment.

Photograph #10: View of the right side of the engine compartment.

Photograph #11: View of the top center of the engine.

Photograph #12: View of the vehicle's alternator and the top front of the engine.

Photograph #13: View of the dashboard area.

Photograph #14: View of the headlight switch.

Photograph #15: Another view of the headlight switch.

Photograph #16: View of the dashboard area and firewall.

Photograph #17: View of the partial Vehicle Identification Number.

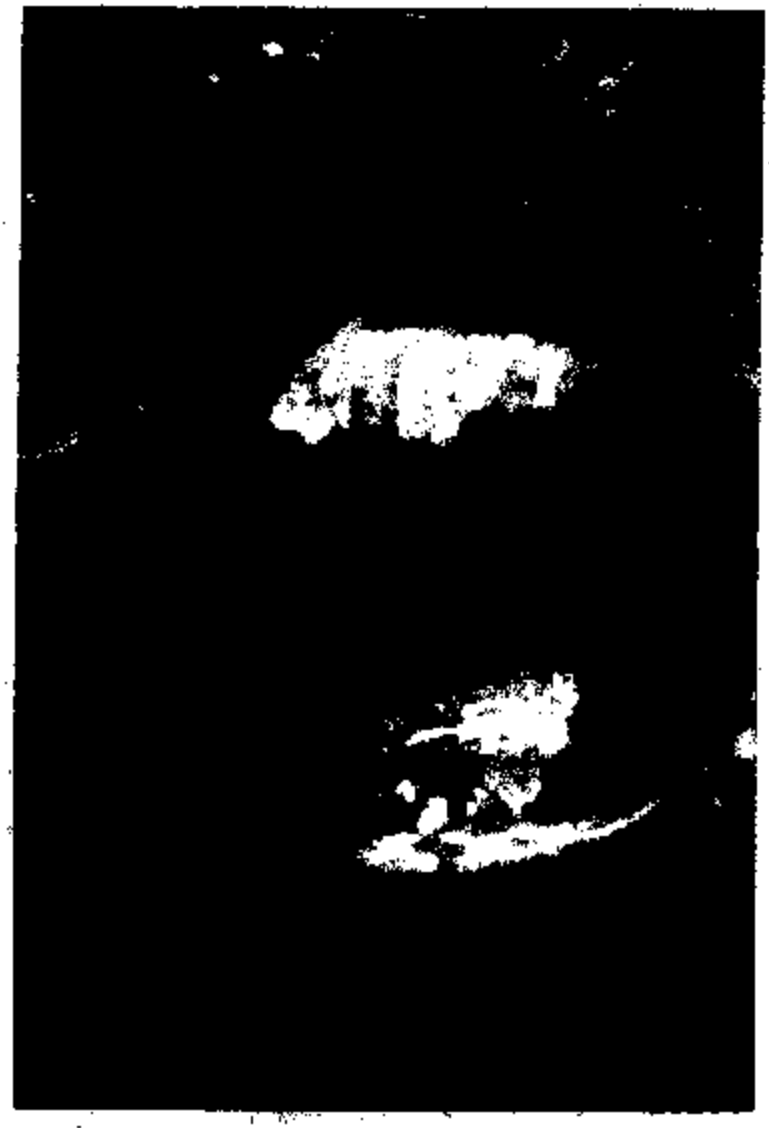
Photograph #18: View of the rear seat area.

Photograph #19: View of the front passenger compartment.

Photograph #20: View of the vehicle's wiring harness near the center of the dash assembly.

Photograph #21: Another view of the vehicle's wiring harness.

Photograph #22: View of the steering column remains at the point it meets the dash.



Photograph #23: Another view of Photograph #22.

OFFENSE INCIDENT REPORT

Agency ORI Number: FL 0110000

01C98F9837 ORD

SHERIFF'S OFFICE
COLLIER COUNTY PROGRESSIVE
NAPLES, FLORIDA

AUG 0 8 2001

FT MYERS V2

Report Number: 0100022742

Date of Incident:	Time:	Day:	Date of Report:	Related Incident:
FM: 07/23/2001	1530	MON	07/24/2001	
TO: 07/24/2001	0345		Dispatch Date: 07/24/2001	
Dispatched: 0345	Arrival: 0349		In-Service: 0830	Case Suspended? Yes: ☒ No: ☐

Location of Incident: [redacted] NAPLES FL

District: [redacted] Grid: [redacted]

Location Code/Type:
25 PARKING LOT/GARAGE

Area:
1 UNINCORPORATED

Children Present? NO

DCF Contacted? NO

Weapon Code/Type:
88 UNKNOWN OD

Forced Entry? 2-NO O

Special Circumstances:

Number:
Of Premises: 0
Offenders: 0
Arrested: 0

Investigator - Name/ID:
JOHN OBST ID #31

Notified: YES
Responded: YES

Referred To: Rec
Assigned To:

#	Clearance:	Commit: Fel/ Attempt: Misd.	Incident Code:	Occ:
1	90-95011	FIRES - ALL OTHERS NOT ARSON		
	2-Exception 05		04391	0800

ORIGINAL

DLB

LM-C800-10

Summary: [redacted] Victims: 2 Suspects/Arrested: 0 Drugs: 0
Witnesses: 0 Missing: 0 Property Items: 1 Vehicles: 2

Reporting Officer: ID: District/Section: Unit: Date Printed:

ER02-625 43813

Incident Report

Report Number: 0100022742

PERSONS - VICTIM

VICTIM: | Charges/Offenses: 1

Name (Last, First Middle) [redacted] | Height Weight Hair Eyes Ethnic Origin [redacted]

Race Sex Date of Birth Age SSN: [redacted] | Drivers License No.: | St: Expires:

Place of Birth:

Address: [redacted] Apt# [redacted]

NAPLES, FL [redacted]

Phone: [redacted]

Residence Status:

Employer/School:
SELF
FINANCIAL CONSULTANT

Phone: ( ) -

Victim Type: 3 ADULT | Victim Relationship To Suspect: 00 N/A

Injury: 0 NONE | Treatment Received: NOT TREATED

Injury Type: 00 N/A 00 N/A

Photos Of Injuries Taken: | Photo Type:

Victim Demeanor: UPSET

Other Data:

VICTIM: | Charges/Offenses: 1

Name (Last, First Middle) [redacted] | Height Weight Hair Eyes Ethnic Origin

Race Sex Date of Birth Age SSN: | Drivers License No.: | St: Expires:

/ / 0

Place of Birth:

Address:
FORT MYERS AIRPORT
FORT MYERS,

Phone: ( ) -

Residence Status:

Employer/School:

Phone: ( ) -

Victim Type: 4 BUSINESS | Victim Relationship To Suspect: 00

Injury: | Treatment Received:

Injury Type:

Photos Of Injuries Taken: | Photo Type:

Victim Demeanor:

Other Data:

Reporting Officer:
CPL THOMAS M MILLER

ID: | District/Section:
District District 3

Collier County Sheriff's Office Naples, FL

Date Printed:
07/24/2001

Page 2 of 7

EXHIBIT 43814

Incident Report

Report Number: 0100022742

PERSONS - VICTIM

VICTIM:	Charges/Offenses: 1
Name (Last, First Middle): [redacted]	Height Weight Hair Eyes Ethnic Origin
Race Sex Date of Birth / / Age 0 SSN:	Drivers License No.: St: Expires:
Place of Birth:	Residence Status:
Address: [redacted] NAPLES, FL	Employer/School:
Phone: [redacted]	Phone: ( ) -
Victim Type: 4 BUSINESS	Victim Relationship To Suspect: NO
Injury:	Treatment Received:
Injury Types:	
Photos Of Injuries Taken:	Photo Type:
Victim Demeanor:	
Other Data:	

Reporting Officer: CPL THOMAS M MCLAIN

ID: District/Section: District 3

Collier County Sheriff's Office Version: 07

Date Printed: 07/24/2041

Page Of

BSO-020 42015

Incident Report

REPORT NUMBER: 0100022742

PROPERTY REPORT

Item Number: 1

Type Article: X MISCELLANEOUS

Status:

Recovery Code:

Damage Engaged By: 4 OTHER

Description: APPROX 10 FT OF ALUMINUM CEILLING

Quantity: 1

Brand	Model	Serial
UNK	UNK	NONE

Color	Age	Owner Applied Id:	Value when stolen:	Recovery value:	Recovery Date:
WHI	UNK	UNK	9000.00	0.00	/ /

Reporting Officer: CPL THOMAS M MULLEN

ID: 1281

District/Section: District 3

Date Printed: 07/24/2001

2002-022 43815

Incident Report

VEHICLES

Report Number: 0100022742

Status VICTIM — Vehicle type AUTO — Used in Felony? NO

Owners Name [redacted]

Race	Sex	Dob	Age
W	M	11/10/1921	79

City: NAPLES — St: FL — Home phone: ([redacted]) -

Other Contact Information

Business phone: ( ) -

Vin	Year	Make	Model
1LNLM82W7PY745577	1993	LINCOLN	TOWNCAR

Style: HARD TOP, 4 DR. — Colors: Primary GRY, Second GRY, Interior

NCIC/FCIC Entry?

Vehicle Characteristics

Tag [redacted] — Decal — State FL — Year [redacted]

Odometer: 158465 — Loss Value: 8,000.00

Remarks

Time — Method — Code

Driver/Last Person in Possession — Altered VIN? — Odometer Reading

Recovery Location — VIN Check w/REMS? — Recovery Value: 0.00

Recovery Condition — Date: / /

Remarks

Wrecker — Phone

Date Stored: / /

Original Reporting Agency — Case Number — Contact

Hold Reason — Authority — Release? — Release To

Owner Notified By — Release Date: / / — Time — Wrecked? — Drivable?

Damage Code

NCIC/FCIC Removal?

Inventory

Reporting Officer: [redacted] — ID: — District/Section: [redacted] — [redacted]

2002-025 43817

Incident Report

VEHICLES

Report Number: **0100022742**

Status VICTIM | Vehicle type AUTO | Used in Felony? NO

Owners Name [redacted] | Race | Sex | Dob / / | Age 0

Address | City | St | Home phone ( ) -

Other Contact Information | Business phone ( ) -

Vin	Year	Make	Model
4A3AA46G11E125068	2001	MITSUBISHI	GALLANT

Style: HARD TOP, 4 DR. | Colors: Primary RED, Second RED | Interior TAN | NCIC/FCIC Entry?

Vehicle Characteristics | Tag [redacted] | Decal | State FL Year [redacted]

Odometer | Loss Value 18,000.00

Remarks

Time | Method | Code

Driver/Last Person in Possession | Altered VIN? | Odometer Reading

Recovery Location | VIN Check w/RMV? | Recovery Value 0.00

Recovery Condition | Date / /

Remarks

Wrecker | Phone

Date Stored / /

Original Reporting Agency | Case Number | Contact

Hold Reason | Authority | Release? | Release To

Owner Notified By | Release Date / / | Time | Wrecked? | Driveable?

Damage Code

NCIC/FCIC Removal?

Inventory

Reporting Officer: CPL THOMAS M MULLEN | ID: 1283 | District/Section: District 3 | Date Printed: 07/24/2001

2002-02S 43818

Incident Report

REPORT NUMBER: 0100022742

NARRATIVE

ON 7-24-2001 I RESPONDED TO 200 PEBBLEBEACH BLVD IN REFERENCE TO A FIRE. UPON ARRIVAL I OBSERVED A LINCOLN TOWN CAR ON FIRE.

ONCE I OBTAINED THE INFORMATION ON THE OWNER, [redacted] HE STATES THAT HE PARKED HIS VEHICLE AT 1530 HRS IN HIS PARKING SPACE. JOHN FURTHER ADDED THAT THE VEHICLE A 1993 LINCOLN TOWN CAR BEARING FL TAG D70BMU WAS IN GOOD CONDITION.

A 2001 MITSUBISHI 4 DOOR BEARING FL[redacted] WAS PARKED NEXT TO THE 1993 LINCOLN TOWN CAR. THE MITSUBISHI'S DRIVER SIDE OF THE VEHICLE HAD BEEN DAMAGED BY THE FIRE. THE FRONT TIRE HAD CAUGHT FIRE AND DAMAGED THE FRONT OF THE VEHICLE. THE VEHICLE BELONGS TO ALAMO RENT A CAR.

FIRE INSPECTOR JOHN OBST ID #31 RESPONDED AND TOOK OVER THE INVESTIGATION. THE ESTIMATED DAMAGE OF THE LINCOLN $8000. THE ESTIMATED DAMAGE OF THE MITSUBISHI $18,000. THERE IS NOTHING SUSPICIOUS AT THIS TIME.

WHILE THE VEHICLES WERE BURNING UNDER THE CARPORT THE FIRE CAUSED A 10 FT WHOLE THROUGH THE ROOF OF THE CARPORT. APPROX DAMAGE $9000.

Reporting:	0	Victims:	3	Suspects/Arrested:	0	Other:	0	NARRATIVE
Witnesses:	0	Missing:	0	Property Items:	1	Vehicles:	2	

Reporting Officer:	ID:	District/Station:	Date Printed:
CPL THOMAS M MULLEN	1281	District 3	07/24/2001

Page 2 of 2

ENS2-825 43819

SUPPLEMENT NARRATIVE REPORT

Agency ORI Number: FL 0110000

SHERIFF'S OFFICE
COLLIER COUNTY
NAPLES, FLORIDA

ORIGINAL

v2.1

Report Number: 0100022742

Date: 07/30/2001

Time:

Victim's Name: [redacted]

Crime Type: VEHICLE FIRE

Original Offense: 1 SO-95011
FIRES - ALL OTHERS NOT ARSON

Incident Code: 04391

Clearance Code: 2-Exception #5

Committed/Attempted: N

Felony/Misdemeanor: O

New Charge:

New UCR Code:

Clearance Code:

Committed/Attempted:

Felony/Misdemeanor:

Narrative:

NOTIFICATION: ON 07-24-01 I WAS ASSIGNED THIS CASE.

DETAILS OF INVESTIGATION: [redacted] I MADE CONTACT WITH THE VICTIM. THE VICTIM ADVISED THAT HIS CRUISE CONTROL HADN'T BEEN WORKING IN ABOUT 90 DAYS, AND THAT HE NEVER RECEIVED A RECALL NOTICE. VICTIM BOUGHT HIS VEHICLE APPROXIMATELY 2 YEARS AGO FROM CLASSIC CARS IN NORTH NAPLES.

INV. JOHN OBTS FROM EMFD ADVISED THAT THIS FIRE DEFINITELY STARTED IN THE ENGINE COMPARTMENT OF THE VEHICLE. [redacted]

STATUS: CASE CLEARED.

Reporting Officer: INV [redacted]

ID: 0479

District/Section: PCB

Unit ID: B231

Supervisor:

1 of 1

Collier County Sheriff's Office, Naples, FL

Date Printed: 07/30/2001

Summary: Reporters: 0 Victims: 0 Suspects/Arrestees: 0 Drugs: 0
Witnesses: 0 Missing: 0 Property Items: 0 Vehicles: 0

10-24-02

ER02-028 430184

INCIDENT REPORT

East Naples Fire Control & Rescue District
Chief Robert Schenk

Delete Change

FDID	Incident No	Exp No	Mo	Day	Yr	Day of Week	Alarm Time	Arrival Time	Time in Service
04012	004144	00	07	24	01	3	3:50	3:51	5:44

Type of Situation Found: Vehicle Fire 13
Type of Action Taken: Extinguishment 1
Mutual Aid Rec'd / Given
Fixed Property Use: Residential Parking Garage 881
Ignition Factor: Undetermined or Not 00
Correct Address: [redacted]
Zipcode
Census Tract
Occupant Name (Last,First,MI)
Telephone
Room or Apt
Owner Name (Last,First,MI): [redacted]
Address: [redacted]
Telephone: [redacted]
Business / Building Name
Method of alarm from public: Telephone Tie-Line 7
District 20
Shift C
No.Alarms 1

Number Fire Service Personnel Responded	Number of Engines Responded	Number Aerial Apparatus Responded	Number Other Apparatus Responded
006	001	001	002

Number of Injuries: Fire Service	Other	Number of Fatalities: Fire Service	Other
000	000	000	000

Complex: [redacted]
Mobile Property Type: Automobile 11
Area of Fire Origin: Eng Area, Running Gear, Wheel 53
Equipment Involved in Ignition: Undetermined or Not Reported 00
Form of Heat Ignition: Undetermined or Not 00
Type of Material Ignited: Undetermined or Not 00
Form of Material Ignited: Undetermined or Not 00
Method of Extinguishment: Preconnected Hose Tank 5
Level of Fire Origin: Grade Level to 9 Feet 1
Estimated Dollar Loss: 6,000.00
Number of Stories
Type of Construction
Extent of Flame Damage
Extent of Smoke Damage
Detector Performance
Sprinkler Performance
If Smoke Spread Beyond Room of Origin
Type of Material Generating Most Smoke
Avenue of Smoke Travel
Form of Material Generating Most Smoke

If Mobile Property Type	Year	Make	Model	Serial Number	License No.
	1993	Lincoln	Town Car	1LNLM82W7PY748877	070-BMU
If Equipment Involved in Ignition	Year	Make	Model	Serial Number	

Officer in Charge (Name, Position,Assignment): Esparra — Date: 7/24/200
Member making Report if different from above: Quintanilla — Date: 7/24/200

E982-028 43528

Aerial Apparatus

☐ L20 ☒ L21

Engines

☐ E20 ☐ P20 ☒ E21

Other Equipment

☐ CH50 ☐ CH52 ☐ CH54 ☐ C20B ☐ LT25 ☐ U20 ☐ U22 ☐ U24 ☒ I2
☐ CH21 ☐ CH23 ☐ C20A ☒ C20C ☐ B21 ☐ U21 ☐ U23 ☐ I20 ☐ I2

Personnel

☐ E4	☐ E5	☐ E12	☐ E17	☐ E21	☐ E27	☒ E31	☐ E36	☒ E45	☐ E50	☐ E55	☐ E62	☐ E68
☐ E5	☐ E9	☒ E13	☐ E18	☐ E24	☐ E28	☐ E32	☐ E37	☐ E47	☐ E52	☐ E56	☐ E63	☐ E69
☐ E6	☒ E10	☐ E15	☐ E19	☐ E25	☐ E29	☐ E33	☐ E39	☒ E48	☐ E53	☐ E57	☐ E65	☐ E70
☐ E7	☐ E11	☐ E16	☐ E20	☐ E26	☒ E30	☐ E34	☐ E43	☐ E49	☐ E54	☐ E60	☐ E67	☐ E71

FDID	Incident No	Exp No	Mo	Day	Yr	Day of Week	Alarm Time	Arrival Time	Time In Service
64112	064144	00	07	24	01	3	3:50	3:51	5:44

Dispatched to dumpster fire, upgraded to vehicle fire. On scene we found a fully involved vehicle fire with another car partially involved in flames under a car port that had vented through the roof. Command was set by Captain 20 and an 1 3/4 hand line was stretched. Initial attack was started on the fully involved Lincoln Town car. Fire was knocked down, then on the adjacent car a Mitsubishi ES. fire was discovered in the engine area fire was knocked down. The attack line was then used to extinguish the aluminum car port. We opened the hood on the Mitsubishi ES and completely extinguished the fire. We then opened the trunk of the town car and checked for extension. Captain 20 requested a fire inspector be turned out. Inspector Obst arrived on scene. Both vehicles had Florida tags.
We discovered the fire had burned through the aluminum car port at the engine area of the Lincoln and also at the rear of the Lincoln where fire had burned through the rear window for a total of 2 vented areas.
SO Case # 01-22742

C% [redacted] Snorto
433907 AZ

01-21933-25
4-10WA-83

EM82-823-B 1228

Fireman's Fund

Fireman's Fund Insurance Company

September 13, 2000

Attn: Consumer Affairs Dept./Ford Motor Co.
16800 Executive Plaza Dr. MD#3NE-B
Dearborn, MI 48126-4207

RE: FFIC Claim Number : 680 99 214780
Our Insured(s) : [redacted]
Date of Loss : [redacted]
Type of Loss : Automobile Accident
Location of Loss : Phoenix, AZ
Claimant/Debtor(s) : Ford Motor Company
Amount of Damages : $17,662.89

To Whom It May Concern:

We insure [redacted] and have paid for the damages resulting from this loss. By the terms of our policy, our insured's right of claim is assigned to us.

Our investigation confirms that you are responsible for this loss, and we are seeking reimbursement of our damages from you or your insurance company. If you have insurance to cover this loss, please report this to them immediately. If you do not have insurance and can not afford to pay the balance in full, we will consider a monthly installment arrangement. However, a signed Promissory Note will be required.

Please respond within 15 days by completing the applicable sections on the next page and returning in the enclosed envelope, or by calling 1-800-621-3899 ext. 5137. If we do not receive a response from you, we will assume you have no intentions of negotiating this matter and we will proceed accordingly.

Sincerely,

REDACTED

John O'Brien
Sr. Claims Representative
National Surety Corporation

FSC-DPD-

Right side of engine block.

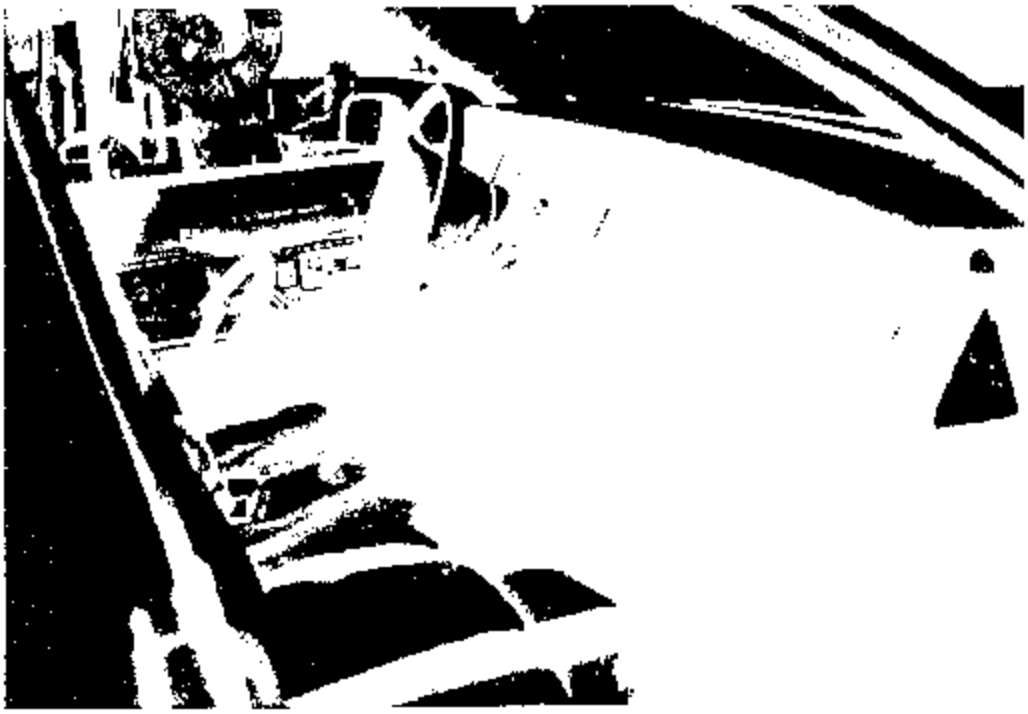
-5-

Left side of engine block showing concerned fuel lines. (circled)

-6-

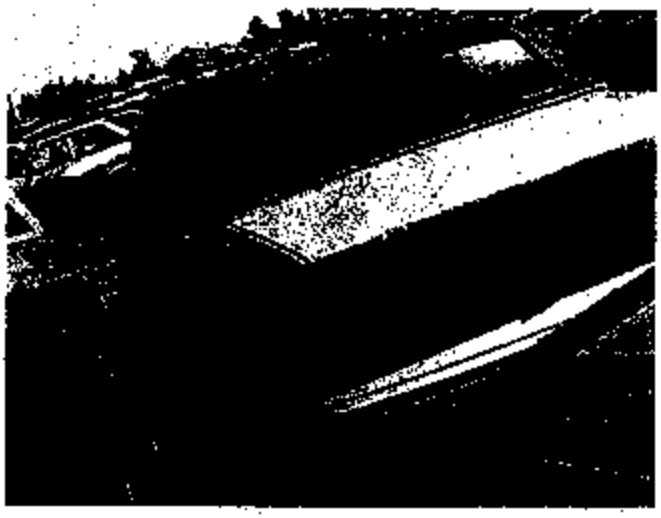
Close-up of fuel lines. (circled)

-7-



Interior of vehicle.

-8-



Insurance Appraisal Services

P.O. Box 54909 • Phoenix AZ 85078-4909 • Phone 480-609-9575 • Fax 480-609-9577

VIN: 1LNLM83W2RY727201 Client [redacted]

Date: 9/15/99 Estimator: RAY HEYS

Job No: J28832FD

PFIC

[redacted]



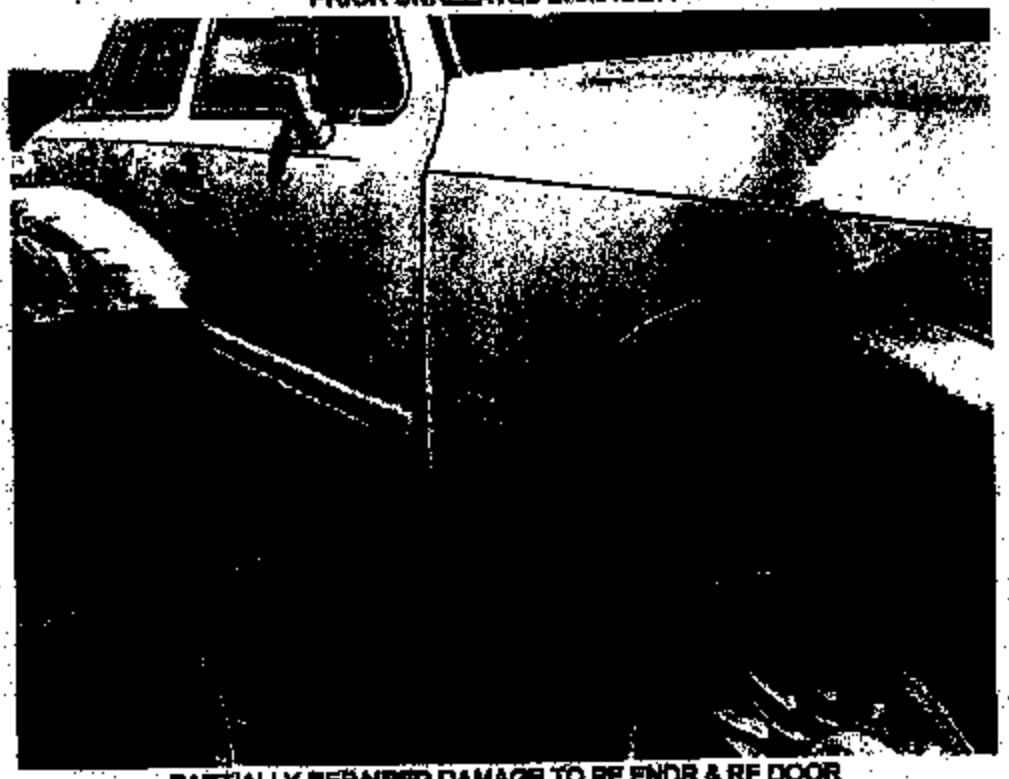



Insurance Appraisal Services
P.O. Box 54909 • Phoenix AZ 85078-4909 • Phone 480-609-9575 • Fax 480-609-9577

VIN: 1LNLM83W2RY727201 Clien[redacted]
Date: 9/15/99
Job No: J28332FD
[redacted]

Estimator: RAY HEYB

PRIOR UNRELATED DAMAGE??



PARTIALLY REPAIRED DAMAGE TO RF FNDR & RF DOOR

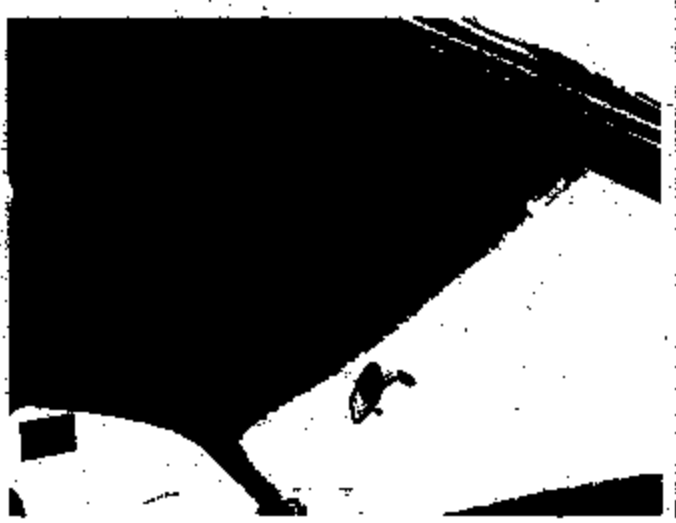
Insurance Appraisal Services
P.O. Box 54909 • Phoenix AZ 85078-4909 • Phone 480-609-9575 • Fax 480-609-9577

VIN: 1LNLM83W2RY727201 Client: [redacted]
Date: 9/15/99
Job No: J26332PD
PFIC

Estimator: RAY HEYS

ER02-625-B 1225

[redacted]

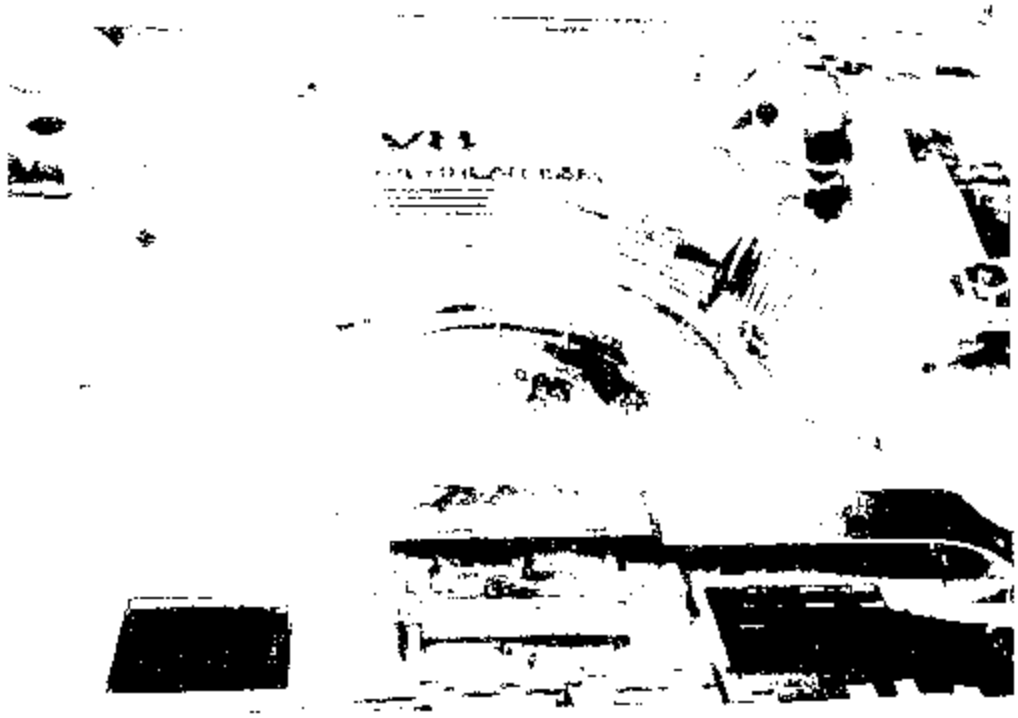


Insurance Appraisal Services
P.O. Box 54909 • Phoenix AZ 85078-4909 • Phone 480-609-9575 • Fax 480-609-9577

VIN: 1LNLM83W2RY727201 Client: [redacted]
Date: 9/15/99
Job No: J28332FD

Estimator: RAY HEYS

[redacted]



Over-all view of simular engine compartment.

-1-

View of high-pressure and return fuel lines at left side of engine

-2-

High-pressure fuel line in contact with brake line. (circled

-3-

Close-up of fuel and brake line. (circled)

-4-

MOORE-KENT, INC.
P.O.BOX 28323
TEMPE, ARIZONA 85285-8323
(480) 491-0979
(480) 491-5954 Fax

PRIVILEDGED/CONFIDENTIAL REPORT

Fireman's Fund Insurance Company
7887 East Belleview Avenue
Denver, Colorado 80111

February 22, 2000

ATTENTION: Shannon Schmidt

INSURED: [redacted]

DATE OF LOSS: September 8, 1999

LOSSS LOCATION:

POLICY NUMBER:

CLAIM NUMBER: [redacted]

M-K FILE NUMBER: 00-7349

OWNER/OCCUPANT: [redacted] vehicle owner)

INCIDENT: The fire was caused by ignition of leaking fuel from a ruptured fuel line inthe engine compartment.

00 FEB 25 AM 9:28

This report is priviledged and confidential. Release to any other company, concern or individual is the responsibility of addressee.

SPECIAL INVESTIGATIONS & CONSULTANTS

8982-026-5 8725

ASSIGNMENT

On February 17, 2000 our office received an assignment to examine and determine the cause of a fire involving a 1994 Lincoln Towncar owned by the insured [redacted]. The said fire had occured on September 8, 1999 while being driven by one of the principals of the company. An examination of the concerned vehicle was conducted on February 18th at the I.A.I. Salvage Yard, 2299 West Broadway Road Phoenix, Arizona.

EXAMINATION OF VEHICLE

The concerned vehicle is a 1994 Lincoln Towncar, Cartier Model. This is a 4dr sedan with identification number 1LNLM83WXRY727[illegible]. The vehicle has an electronic type instrument panel and the odometer could not be read. We did find a service repair order in the vehicle dated September 6, 1999 which indicated the mileage on that date to be 48510. The vehicle is fully powered including door locks, windows, seats, etc. Door entry is made through a combination pad on the door. The transmission is automatic. The engine is a V8, fuel injected. The seats are a combination of cloth and leather. The roof is vynal covered.

At the time of our examination we observed fire damage contained to the front end. Heat transfer patterns were observed on the hood and front fenders. The heaviest damage was at the left side. All four tires remained inflated. No glass was broken nor cracked. No damage was noted to the vynal top. The gas tank was not involved. The only fire damage noted to the interior was when there was

ignition of the plastic A/C vents at the center of the dash resulting with heat transfer to the leather covered visors and small portions of the burning visors falling onto the front seat. There was no evident damage to the dash, steering collumn nor controls.

Fire is burning freely in the engine compartment with every indication that this is a fuel fed fire. There was surface burning of the radiator and heater hoses. The serpentine fan belt was partially consumed. The battery on the right front side had deformed on top exposing the cells. The battery cables had been cut. No electrical malfunction were observed in this area that could have caused the fire. The wiring harness along the fenders and fire wall had the outer plastics deformed, but no arcing was observed. The radiator corehad not deformed. There was deformity of the brake fluid reservoir. Plastic materials had melted on top of the engine block. No leakage was noted in the area of the fuel injectors. We found damage to the fuel line that run to the injector rod. A portion of the neoprene of the return line was missing and heavy damage noted to the high-pressure line feeding fuel to the injectors. Both the high-pressure line and return line are metal from the rear of the vehicle to the engine compartment. There is then an approximate 12" neoprene line to the injector rod.

CAUSE AND ORIGIN

The fire is originating in the engine compartment and was caused by ignition of fuel coming from a ruptured neoprene fuel line. All fire patterns indicate the fire to be caused and fed from a fuel leak. We found no evidence of an electrical malfunction.

ENCLOSURES

Photographs mounted. Unmounted photographs. Service Order Invoice.

COMMENTS

The fire involving the insured's 1994 Lincoln Towncar was accidental and caused by ignition of leaking fuel from a ruptured neoprene fuel line. Damage was noted to both the high-pressure and return lines. Either of which could have been the source of leaking fuel. The fuel appears to have been ignited either from an electrical spark in the engine compartment or from the hot exhaust manifold.

In examing simular type vehicles we did observe that the neoprene portion of the high-pressure fuel line comes in direct contact with the metal power brake line. Movement of the engine could cause these lines to rub together causing deterioration of the neoprene. This is not a sound manufacturing practice.

We found no electrical malfunction that caused the fire.

Leaking power brake or brake fluid ignition was also ruled out.

Fire damage was contained to the engine compartment and front exterior portion of the vehicle.

The said vehicle was serviced three (3) days before the fire. However, the invoice does not indicate work on the fuel lines. It should be determined if additional work was performed. We had attempted to contact the insured, but to date have not returned our calls.

At this time we will hold our file open unless we hear different from you.

MOORE-KENT, INC.

Thomas J. Bugh

MOORE-KENT, INC.
P.O.Box 28323
Tempe, Arizona 85285-8323
(480) 491-0979
(480) 491-5954 (Fax)

Fireman's Fund Insurance Company
7887 East Belleview Avenue
Denver, Colorado 80111

March 24, 2000

Attention: Shannon Schmidt

Insured: [redacted]
D/Loss:
Claim No.:
Our File: oo-7349

ADDITIONAL INVESTIGATION

We had advised you in our report of February 22, 2000, that the cause of the fire involving the insured's 1994 Lincoln Towncar was caused by ignition of leaking fuel from a rupture of the high pressure fuel line. During examinations of simular type vehicles we observed where the said fuel line is installed at the factory in direct contact with the metal power brake line. Since the fuel line is neoprene, it is possible that rubbing of the two lines could cause a rupture. We are enclosing photographs of this condition.

During our interview of [redacted] of [redacted], he had advised us that there was no problems with the said vehicle and that it ran very well prior to the fire. The only work done on it was routine maintenance. As previously reported, the last maintenance was three (3) days prior to the fire. In order to do the said maintenance, it would have required the mechanic to work in the area of the fuel line, but not on it.

At this time we will continue to maintain an open file.

W.LEACHMAN
MAR 30 2000

Special Investigations & Consultants

8982-625-8 8736

MOORE-Kent, Inc.

Thomas J. Pugh

W. LEAL/mmf
MAR 30 2000

[redacted] Arobinso TX 1709

E862-425 42795

A Robinson

1229-E1
1-10WC-53

MARKET CLAIM OFFICE
P. O. BOX 12[illegible]
TYLER TX 75713-2940

PHONE NUMBER: 903-535-4000
OFFICE HOURS: MONDAY-FRIDAY 8:00-4:30

OK

Allstate
You're in good hands.

August 10, 2000

FORD MOTOR COMPANY
P O BOX 1904
DEARBORN MI 48121

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
AUG 15 2000
OFFICE OF THE
GENERAL COUNSEL

CUSTOMER SUPPORT
CENTER
2000 AUG 16 A 8:21

Allstate Indemnity Company
Claim Number: 4852454828 MDE
Our Insured: [redacted]
Date of Loss: July 8, 2000

To Whom It May Concern:

This letter serves to give notice of the subrogation rights of Allstate Insurance Company regarding damages to a 1992 Mercury Grand Marquis due to a vehicle fire. Further documentation will be transmitted separately.

Evidence has been retained regarding this fire and is in the custody of System Engineering and Laboratories in Tyler, Texas. If you wish to inspect this evidence, you will need to contact this office to make the appropriate arrangements. This evidence will be available for inspection for 90 days from the date of this letter.

Sincerely,

D English

DEBORAH R. ENGLISH
Allstate Property-Casualty Claim Service Organization

SM07/0/02/1

OFFICE OF THE
GENERAL COUNSEL
00 AUG 16 A8:46
LITIGATION
PRACTICE GROUP

G52-1

ER02-625 42787

[redacted] AC —

SUPREME COURT
COUNTY OF NASSAU, NEW YORK

—93-2667 — 9/93

[redacted] August 19, 1993

9/93

94-208784-12
4-17w255

DISPOSE of Copies (Blank Diskette) by:
RETAIN Record Copy (Hard Copy or Diskette)
Schedule Number: 10-6 (5)
2003

[redacted] 4891

P.O. Box 660168 • Dallas, TX 75266-0168
(214) 541-6070 • (214) 541-6085-FAX • 1 (800) 543-7941

July 2, 1993

PREV. - AC - LAWSUIT
93-2667
MATEUS, JOSE

Office of General Council
Ford Motor Company
#900 Parklane Tower West
Dearborn, MI 48126

RE: Claim # : PDP-14414
Insured : [redacted]
Plaintiffs : Aetna Casualty & Surety Co. a/s/o [redacted]
Type of Loss : Product Defect

To Whom It May Concern:

Attached is a summons and complaint that was served on our insured [redacted] in relation to a fire which totalled a 1992 Ford Crown Victoria purchased by the plaintiff [redacted] from our insured. The plaintiffs allege that product defects involving the battery and the electrical system of the vehicle were the cause of the fire.

We are formally requesting your full indemnification of our insured [redacted]. in this case. Please contact me at 1/800-543-7941, extension 6054 at your earliest convenience to advise of your position in this loss.

Sincerely,

Joan Hunter

Joan Hunter
PDP Claim Center

cc: Bellavia & Kassal
Attorneys at Law
200 Old Country Rd.
Mineola, NY 11501

cc: [redacted]

5982-825-8 4832

212 686 7417 FEDERAL CONT NY P.01

Arnie Dad Burns

358-32[illegible]

STATEMENT OF FIRE CLAIM

(Please Answer All Questions)

Return to:
Aetna Life & Casualty
[illegible] Claims
[redacted]

Name of Insured [redacted] 3000

Address [redacted] ccess, N.Y. [illegible]

Drivers Lic # [redacted] (Home) [redacted]

Date of Loss [illegible] [redacted] (Bus.)

Was the car parked at the time? Yes ✓ No ___ Vehicle [illegible] Yes X No ___

Date vehicle last seen 8/16/92 Time ___ (AM)/PM (Circle One)

Was the vehicle being driven at the time? Yes ___ No X

Name of Driver ___

Address ___ Phone No (Home) ___

Drivers Lic # ___ (Bus.) ___

Name and address of others present ___

Did police respond? Yes X No

Precinct Mineola Case Number ___

Did the Fire Dept. respond? Yes X No Which Dept.? Mineola, N.Y.

Dept. address Mineola N.Y. Case # ___

VEHICLE INFORMATION

Year 1991 Make Ford Model Crown Victoria

Mileage [illegible] Vehicle ID # 2FAC[illegible] Body Type 4 Door Color Dark [illegible]

State Registered New York Plate # [redacted]

Any recent servicing? Yes X No ___ Reason [illegible]

If bills or receipts are available, please submit.

Name and address of Shop Mineola Ford

Date car was purchased [illegible] New X Used ___ Purchase Price $2?,??7.68

Trade-in car ___ Seller-Dealer Name Mineola Ford / Individual

Lien Holder [illegible] Balance Due [illegible] How Long [illegible]

Please describe events that occurred prior to the loss.

[illegible]

The above is true to the best of my knowledge and recollection.

Policyholder's Signature [illegible]

Notary Rafael Beaumont Date 8/17/92

"Any person who knowingly and with intent to defraud any insurance company or other person files a statement of claim containing any materially false information, or conceals for the purpose of misleading, information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime."

(SEE OVER)

RAFAEL BEAUMONT
Notary Public, State of New York
No. [illegible]
Qualified in [illegible] County
Commission Expires August [illegible], 19[illegible]

ATTN: MS. D. BURNS

[redacted]

Driver Lic # M01716-25718-092357-25

ER62-025-8 4633

MINEOLA FORD
SALES, LTD.

311 Jericho Turnpike

MINEOLA, NEW YORK 11501

SALES [illegible] | SERVICE [illegible] | PARTS [illegible]

ALL PARTS ARE NEW EXCEPT AS NOTED

CONTROL NO.

[illegible]

23124	ROBERT PACE 61		407	08/12/92	FOCS66047
[redacted]	70.00		3500	RD/RD	
	92/FORD/CROWN VIC/LX 4DR			06/08/91	
	2[illegible]A[illegible]P[illegible]4[illegible]4[illegible]X[illegible]0[illegible]5[illegible]B[illegible]				
MINEOLA, NY [redacted]				08/06/92	
[redacted]					

LABOR & PARTS
JB 1 05/02 MISC/3 HOURS: 0.00 TECH(S):35 — 0.00
CAR WENT UP IN FLAMS

JOB # 1 TOTAL LABOR & PARTS — 0.00

SUBLET—PO#—VEND INV#-INV DATE-DESCRIPTION
JOB # 1 66047 28932 08/02/92 TOWING — 123.00
TOTAL - SUBLET — 123.00

TECHNICIAN CERTIFICATION
35 JAMES CONNELLY 7274

TOTALS

TOTAL LABOR..	0.00
TOTAL PARTS..	0.00
TOTAL SUBLET.	123.00
TOTAL G.O.G..	0.00
TOTAL MISC...	0.00
TOTAL TAX....	10.46
TOTAL INVOICE $	133.46

CUSTOMER SIGNATURE

Ford

EA02-025-B 4634

PAGE 1 OF 1 [END OF INVOICE]

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

----------X

Aetna Casualty & Surety Co. a/s/o [redacted]

Plaintiff(s), COMPLAINT

-against-

Ford Motor Company and Mineola Ford Sales Ltd.,

Defendant(s),

----------X

PLAINTIFF, Aetna Casualty & Surety Company, by its attorney, ALLEN D. WERTER, complaining of the defendant alleges upon information and belief:

AS AND FOR A FIRST CAUSE OF ACTION

1. At all times hereinafter mentioned plaintiff, Aetna Casualty & Surety Company, was and still is a corporation organized under the laws of the State of Connecticut and authorized to do business in the State of New York.

2. At all times hereinafter mentioned defendant, Ford Motor Company, was a corporation organized under the laws of a foreign state and authorized to do business in the State of New York.

3. At all times hereinafter mentioned defendant, [redacted]., was a corporation organized under the laws of the State of New York with its principal place of business in the County of Nassau, State of New York.

4. That on or about August 5, 1992 plaintiff's subrogor, [redacted], was the owner of a certain 1992 Ford

EH02-625-8 4635

Crown Victoria automobile.

5. That said automobile had been purchased by plaintiff's subrogor from defendants on June 8, 1991.

6. That on August 5, 1992 while the vehicle was not in use, the said vehicle burst into flames and was destroyed by fire.

7. That said fire occurred as a result of a defect in the battery and electrical system said system having been manufactured with a defect and sold with a defect by defendants.

8. That said defect and the resultant fire gave rise to a claim for strict liability and tort against defendants.

9. That on August 5, 1992 plaintiff's subrogor's motor vehicle was insured by plaintiff under a policy of comprehensive automobile insurance.

10. That due to the aforementioned loss, plaintiff was compelled to pay to plaintiff's subrogor the sum of $16,193.03.

11. That following said payment plaintiff became subrogated to the rights of [redacted] against defendants herein.

AS AND FOR A SECOND CAUSE OF ACTION

12. Plaintiff repeats and reiterates all of the allegations set forth in paragraphs one through eleven (1-11) as if set forth more fully herein.

13. That on July 27, 1992, plaintiff's subrogor did have the said battery recharged by defendant, Mineola Ford

14. That defendant, Mineola Ford Sales Ltd., was negligent and careless in charging the aforementioned battery resulting in the fire of August 5, 1992.

WHEREFORE, plaintiff demands judgment against the defendant on the First Cause of Action in the sum of $16,193.03 and judgment against the defendant on the Second Cause of Action in the sum of $16,193.03 plus interest from August 5, 1992 and the costs and disbursements of this action.

Dated, Carle Place, N.Y.
May 24, 1993

Yours, etc.,
ALLEN D. WERTER, ESQ.
One Old Country Rd.,
Carle Place, N.Y. 11514
(516) 742-6611
Our file: A5357

98-5521

MAXWELL, CARL

FL

VK

06/19/96 MASTER OWNER RELATIONS SYSTEM II 02.50.21

YEAR: 17 SOURCE: INQUIRY CONTACT VEH TYPE: CAR
ORLANDO 24 ZN/TR: 81 CONTACT NBR: 107084361 OPENED: 06/18/1996
VIN: 1LNLM81W1HY624221 CLOSED: 06/18/1996

LAST NAME: [redacted] FIRST NAME: [redacted] STATUS: CLOSED
TITLE: MI: [redacted]
ADDRESS:
CITY: LOXAHATCHEE STATE: FL ZIP: [redacted]
HOME PHONE: - - BUS. PHONE: - -
MODEL YEAR: 92 MODEL: TOWN CAR
MILEAGE: 59500 MAKE:

DEALER NAME: PALM BEACH LINCOLN-MSALES CODE: 325202 PA CODE:11606
CAUSAL CODE: SYMPTOMS:
INQUIRY CODE: 1420 ALLEGED PERSONAL INJURY - INQUIRY

FOLLOW UP:N COMM TYPE:P MICRO NBR: LETTER CODE:

COMMENTS:
1996/06/18
ALLEGED PERSONAL INJURY
CUSTOMER SAYS:
-VEHICLE CAUGHT FIRE WHILE IN MOTION ON FRIDAY, JUNE 7, 1996
-CAUSE OF FIRE UNKNOWN
-HUSBAN[redacted] - RECEIVED A CONCUSSION
-AND HE[redacted] FRACTURED HIS LEFT ARM
[redacted] WENT TO PALM BEST HOSPITAL, IN LOXAHATCHEE, FL, THE SAME NIGHT
[redacted] WENT TWO DAYS LATER
-GARDEN FIRE AND POLICE DEPARTMENTS WERE CONTACTED - REPORT NUMBERS
UNAVAILABLE
-INSURANCE CO. HAS BEEN CONTACTED - CLAIM WITH FIRE HAS BEEN SETTLED(WINDSOR
GROUP INSURANCE, MIKE-(1-800-521-5858 EXT.187) CLAIM# [redacted]
*
CAC ADVISED:
-INFORMATION HAS BEEN DOCUMENTED AND WILL BE FORWARDED TO THE APPROPRIATE
OFFICE FOR REVIEW
-NO TIME FRAME AVAILABLE FOR RECONTACT

96-5521

E982-828 81285

OWNER RELATIONS ANALYSIS AND ADMINISTRATION 06/19/96 FAXINQTG

[redacted] SNORTON1
PA

[redacted]

EH82-626 22422

[redacted]
462814 ACHABOT FL

1229-22
1-10WC-53

E903-028 42708

State Farm Insurance Companies

P. O. Box 5613
Winter Haven, FL 33883-5613
1-800-301-7350

April 2, 2002

Ford Motor Company
Parklane Powers W., Ste. 400
3 Parklane Boulevard
Dearborn, MI 48126-2568

Claim Number:
Our Insured: [redacted]
Date of Loss: March 20, 2002
Make, Model and Product Year: 1993 Mercury Grand Marquis, VIN #2MELM75W3PX653228

Dear Sir or Madam:

The identified Mercury Grand Marquis is insured by State Farm Mutual Automobile Insurance Company. This vehicle experienced a fire.

State Farm® would like to give you the opportunity to inspect the vehicle and give you advance notice of our potential subrogation claim.

Please contact me at 1-800-301-7350, extension 8567 to set up a time for your inspection.

Sincerely,

Daphine A. Gillum

Daphine Gillum
Senior Claim Representative
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
1-800-301-7350 Ext. 8567

DG/039/0402010.122