

EA02-025

FORD 10/27/03

LETTER TO ODI

APPENDIX M

BOOK 14 OF 22

PART A-D

PART D

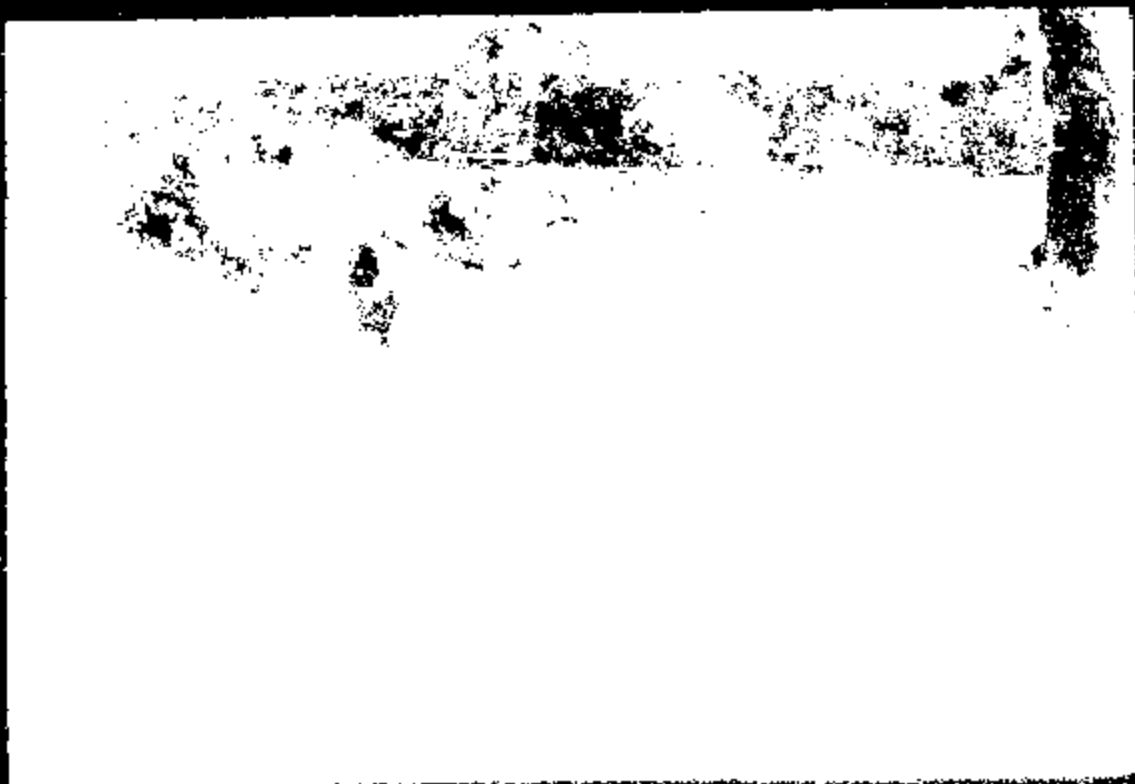


EP62-025 34430





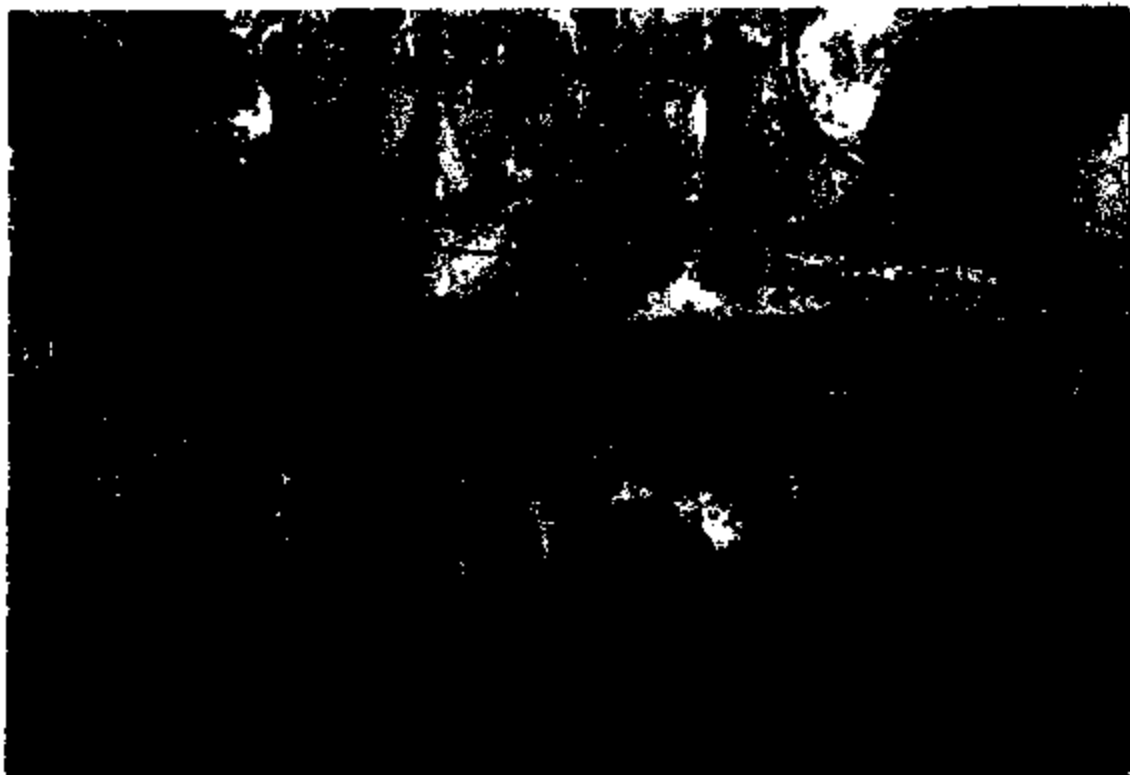




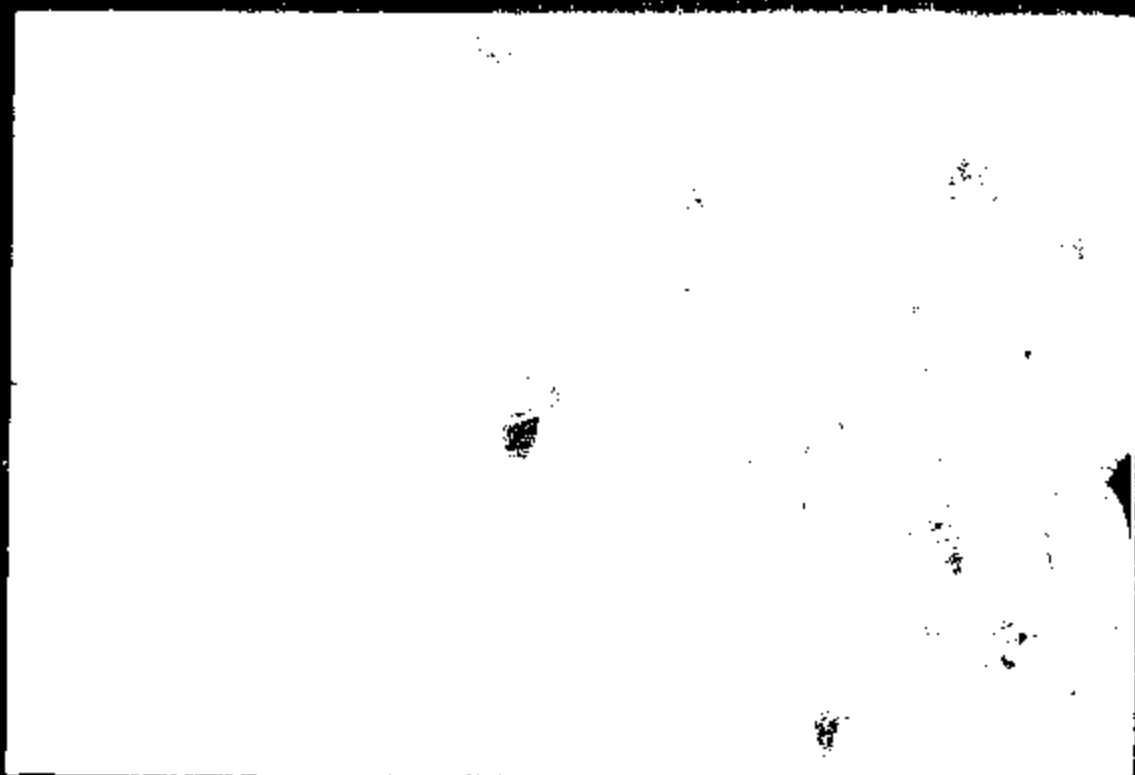
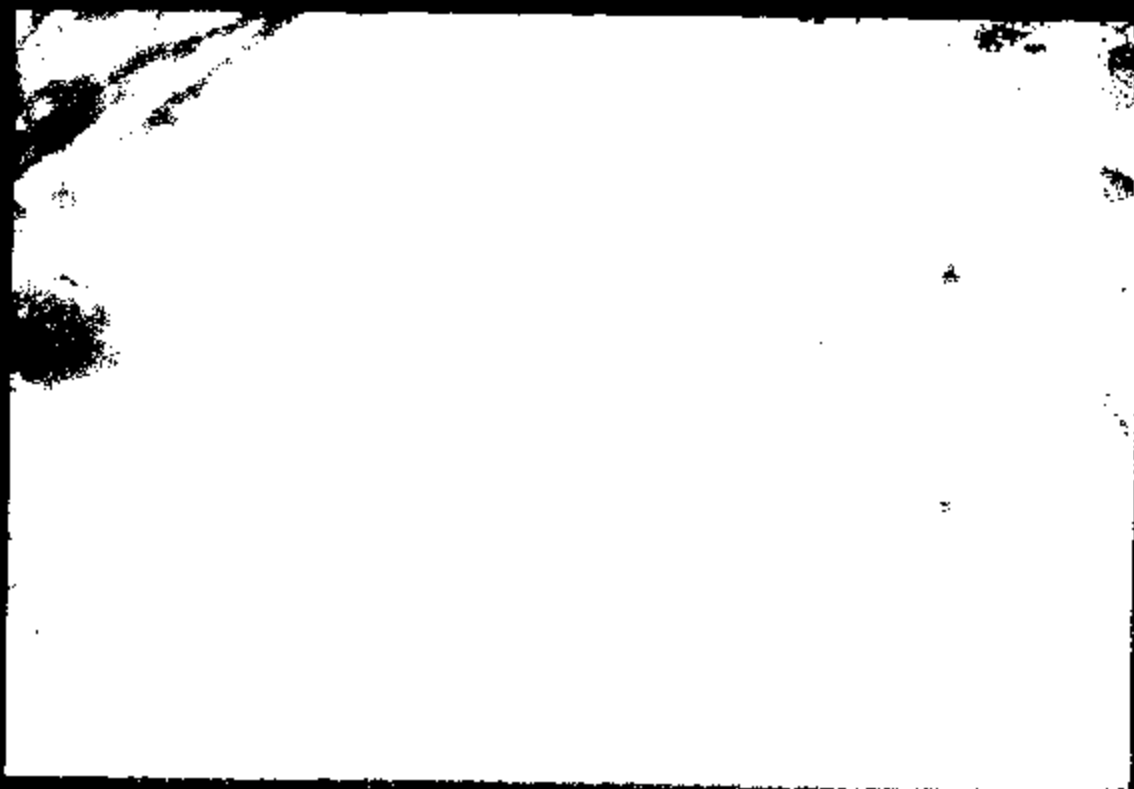
2002-020 34443



0002-020 34444



IR62-628 34445





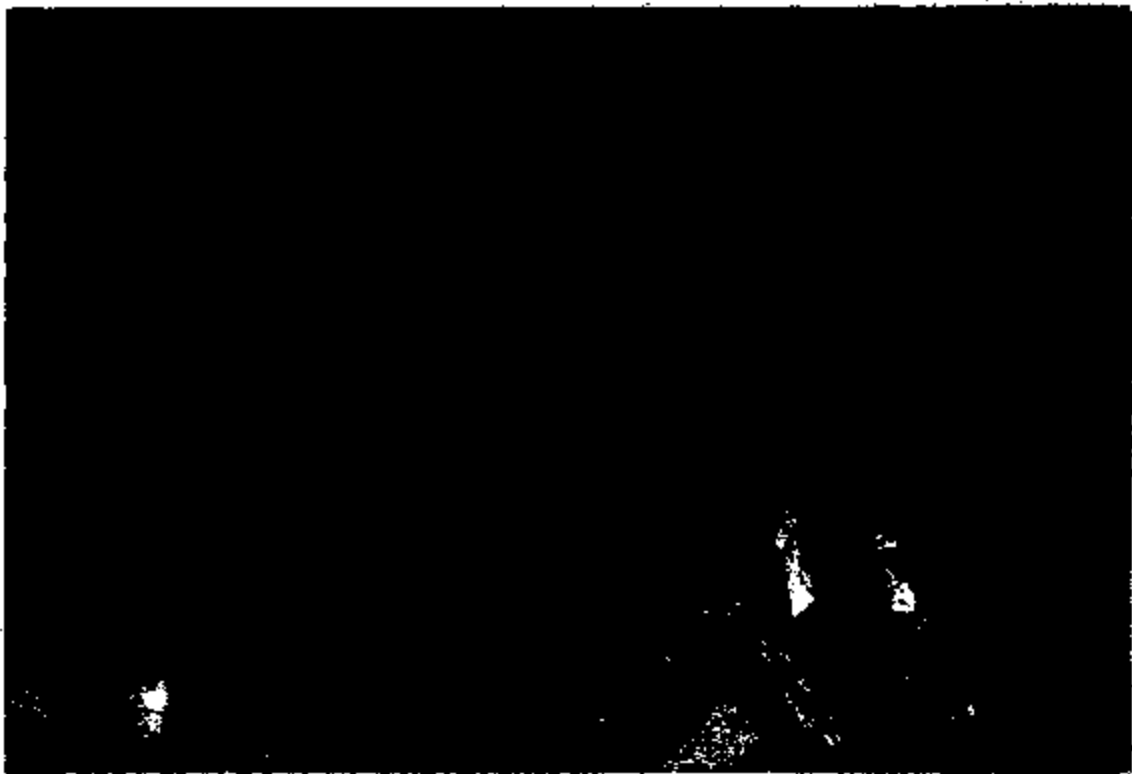


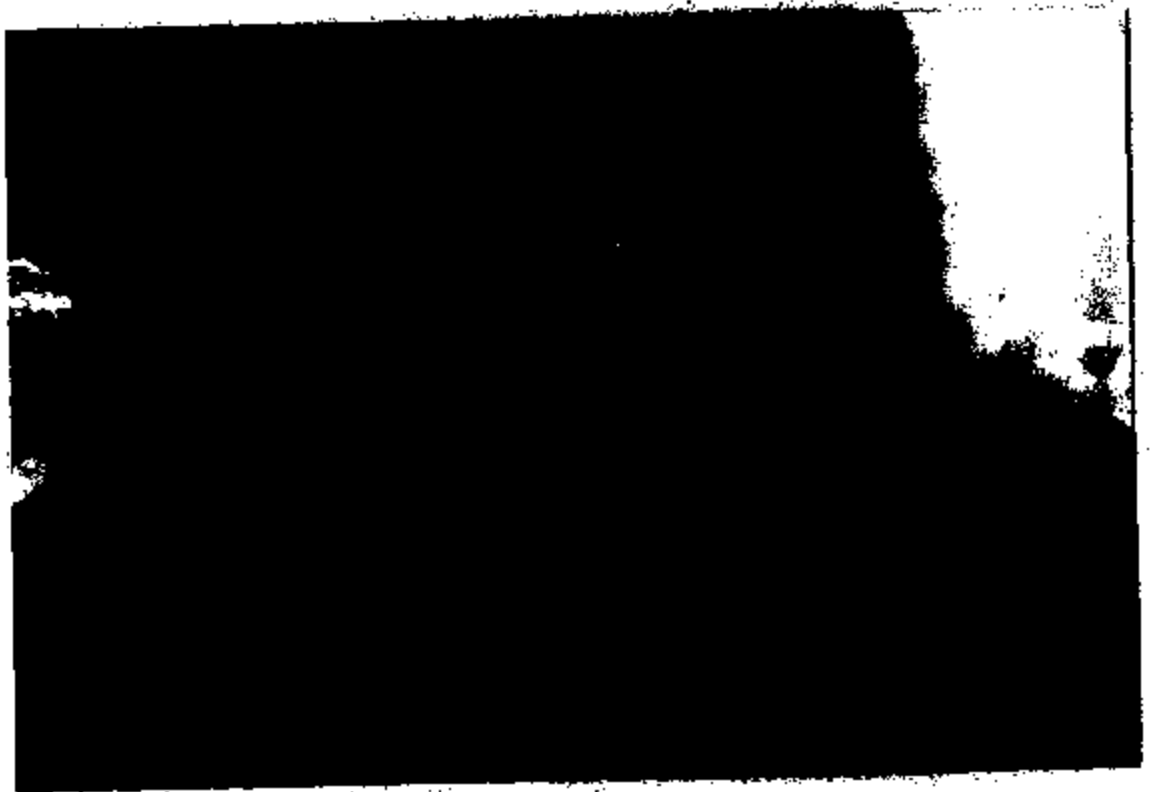
ER02-025 34448

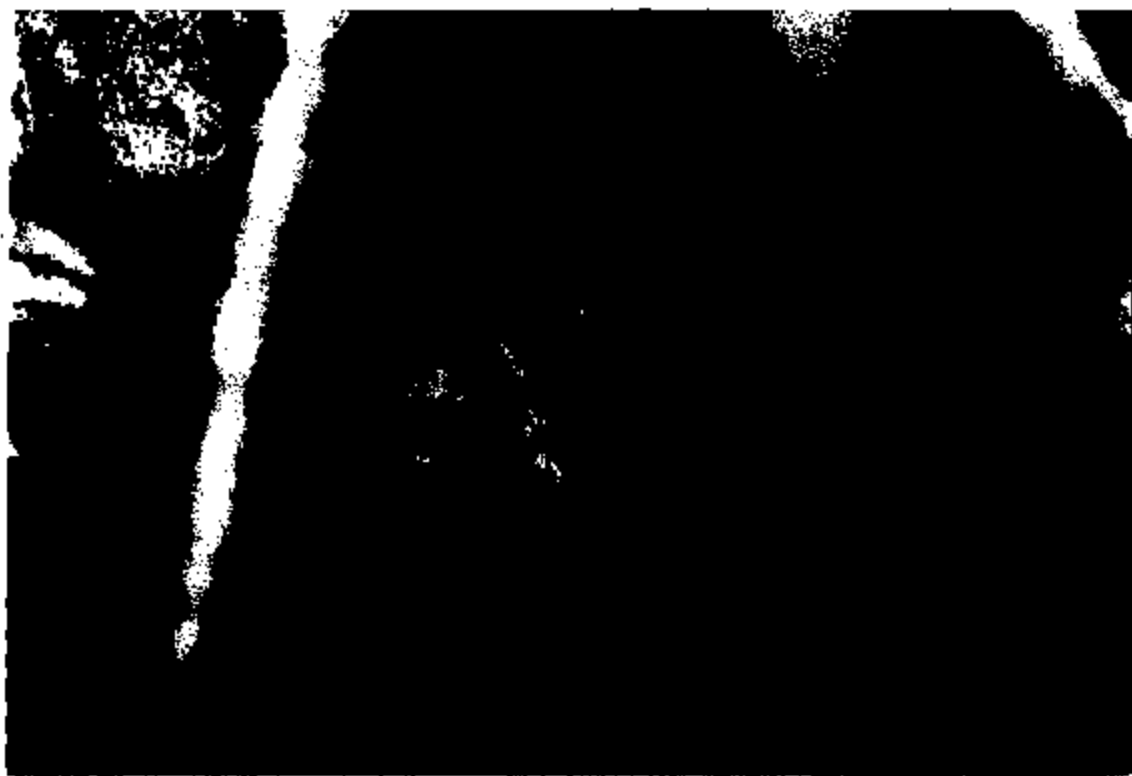


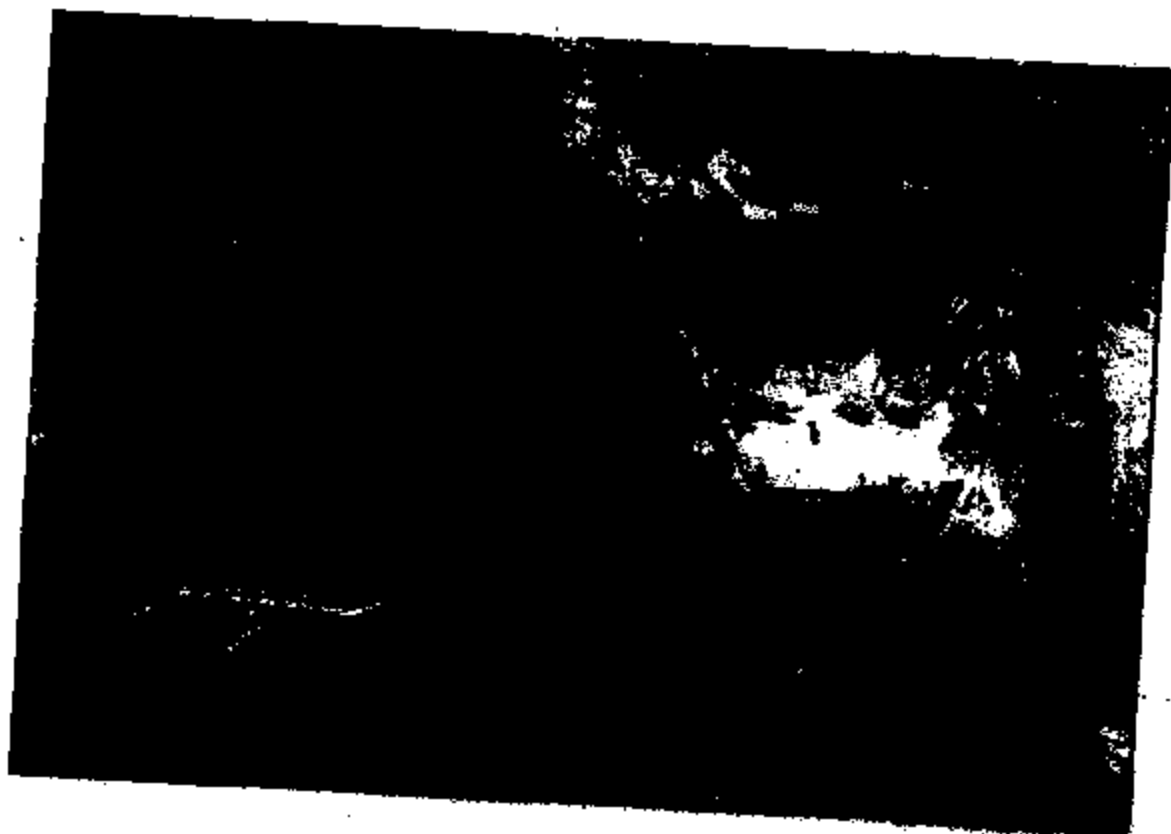
0002-025 34440



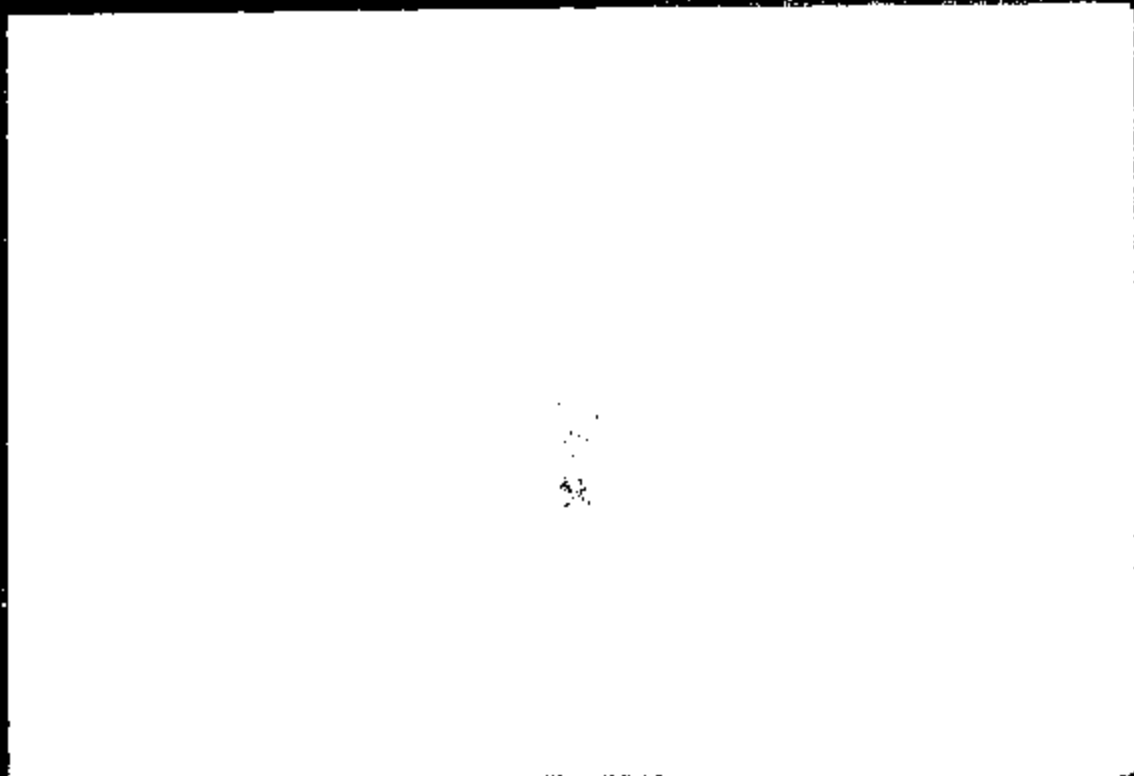


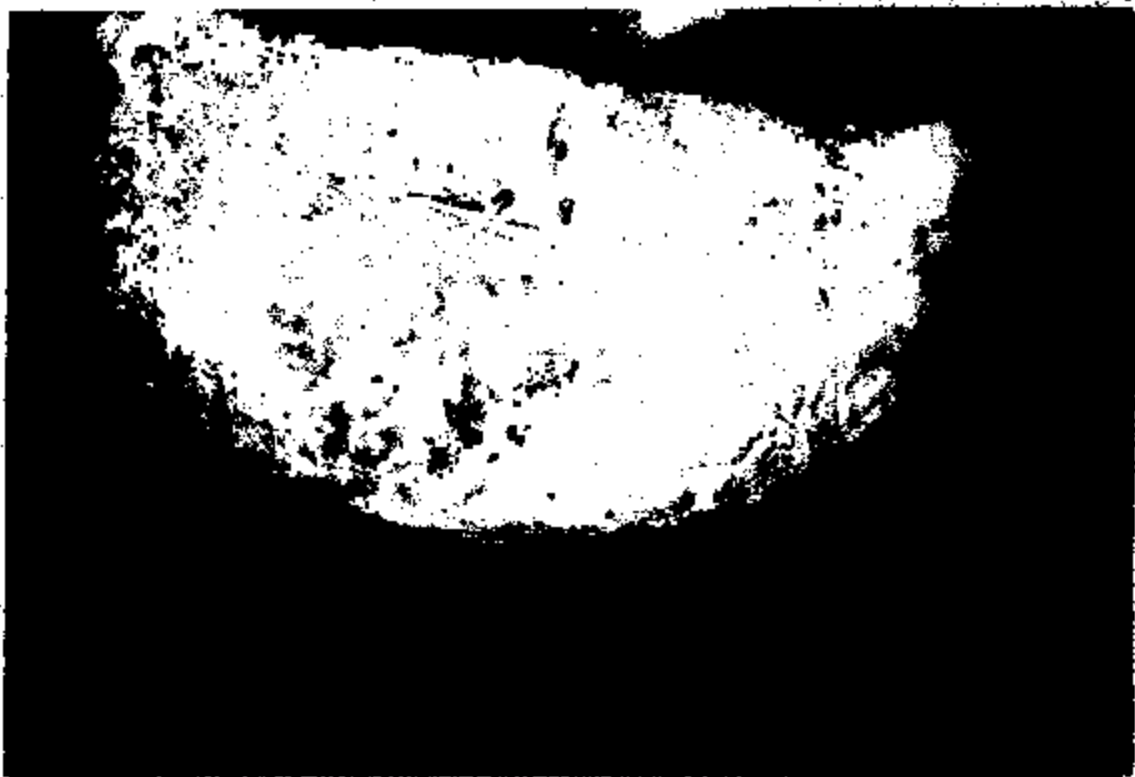


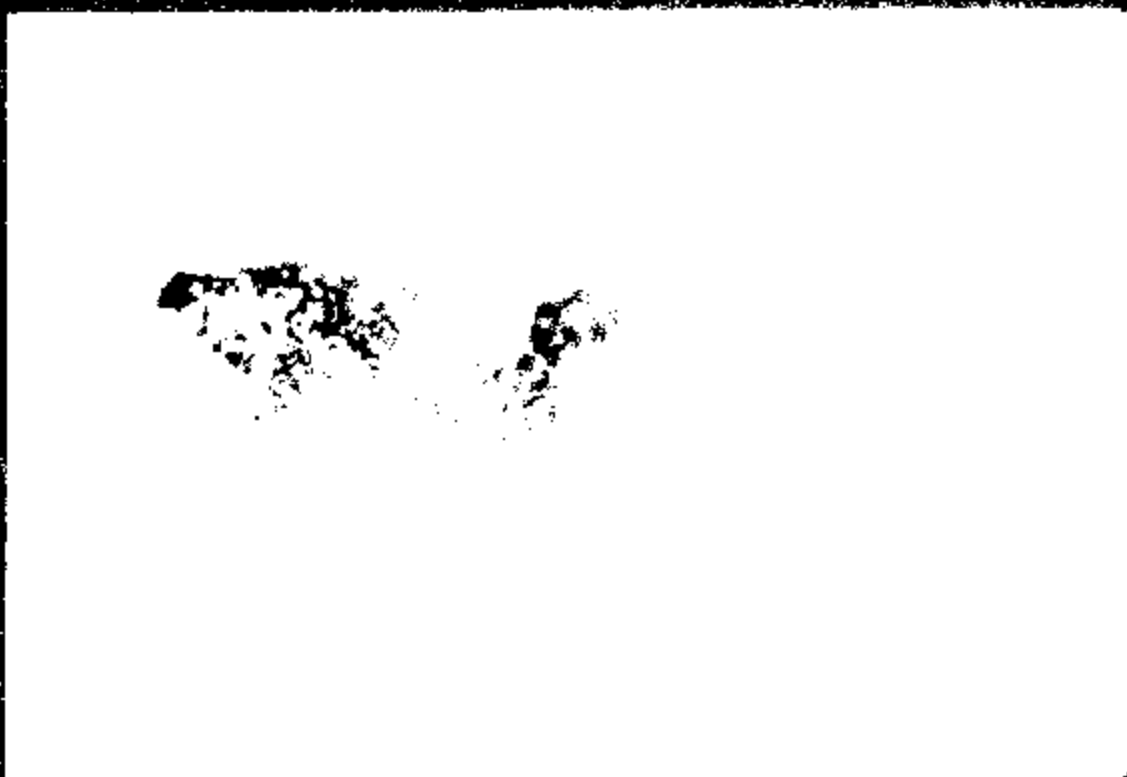




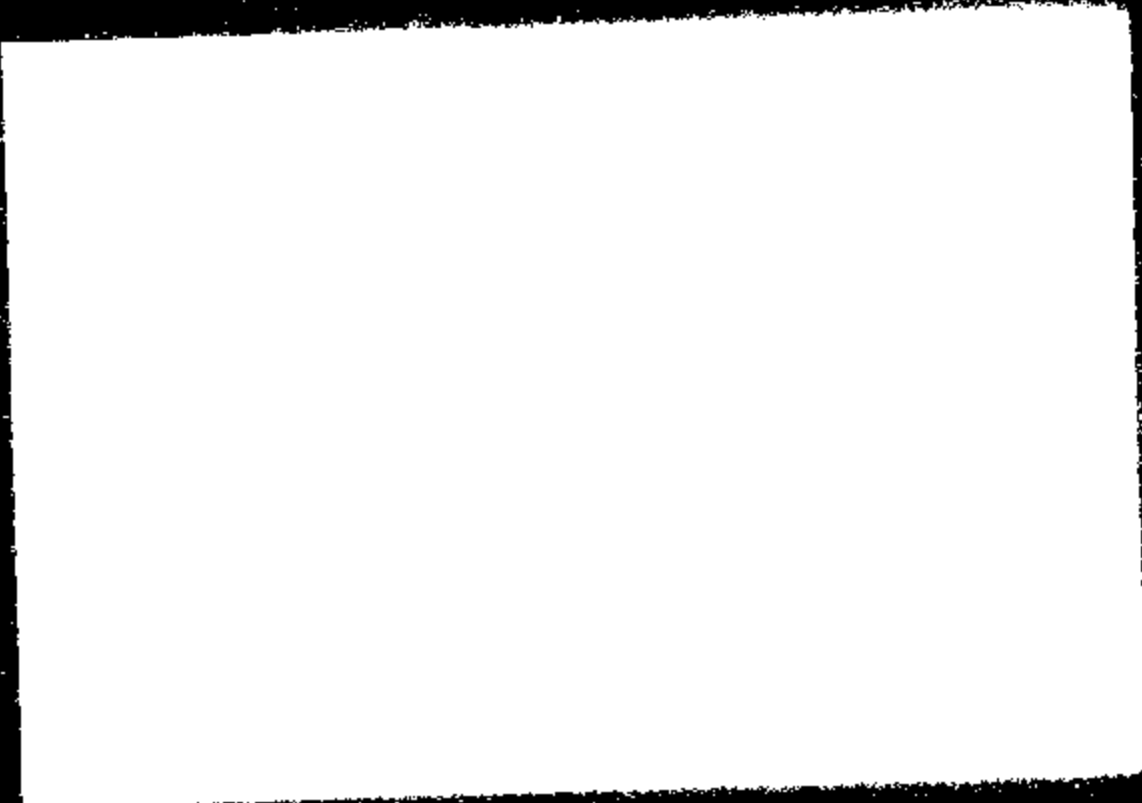


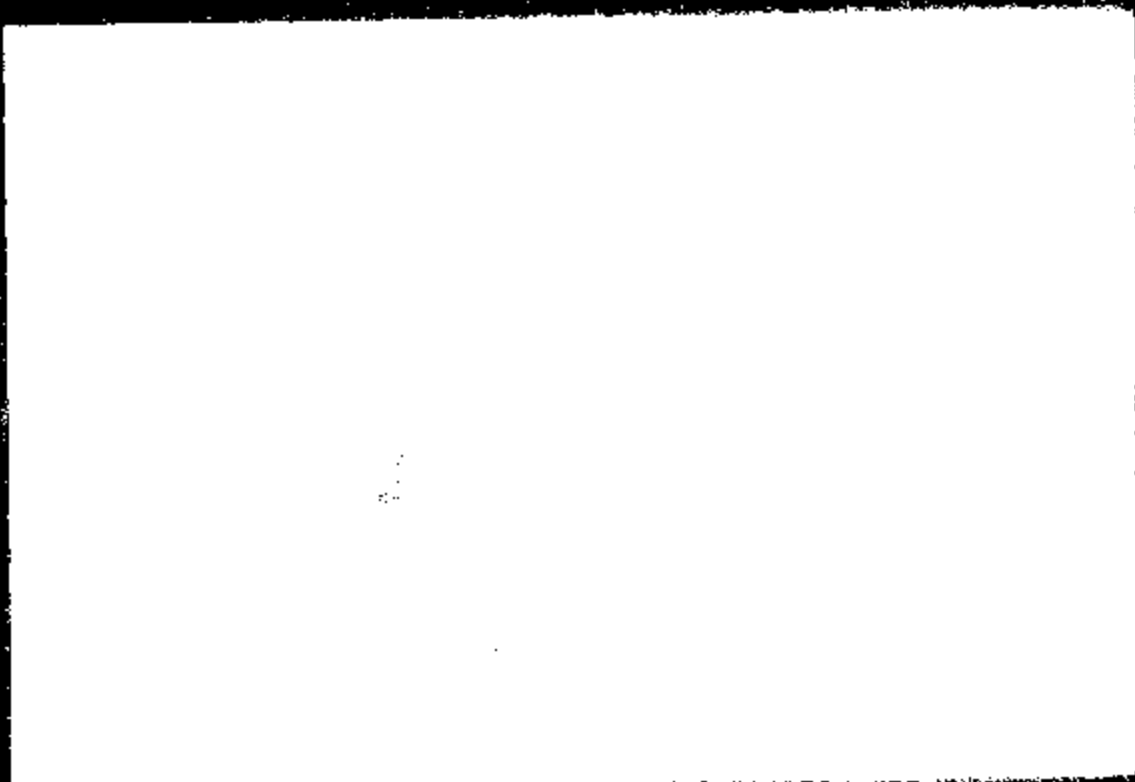
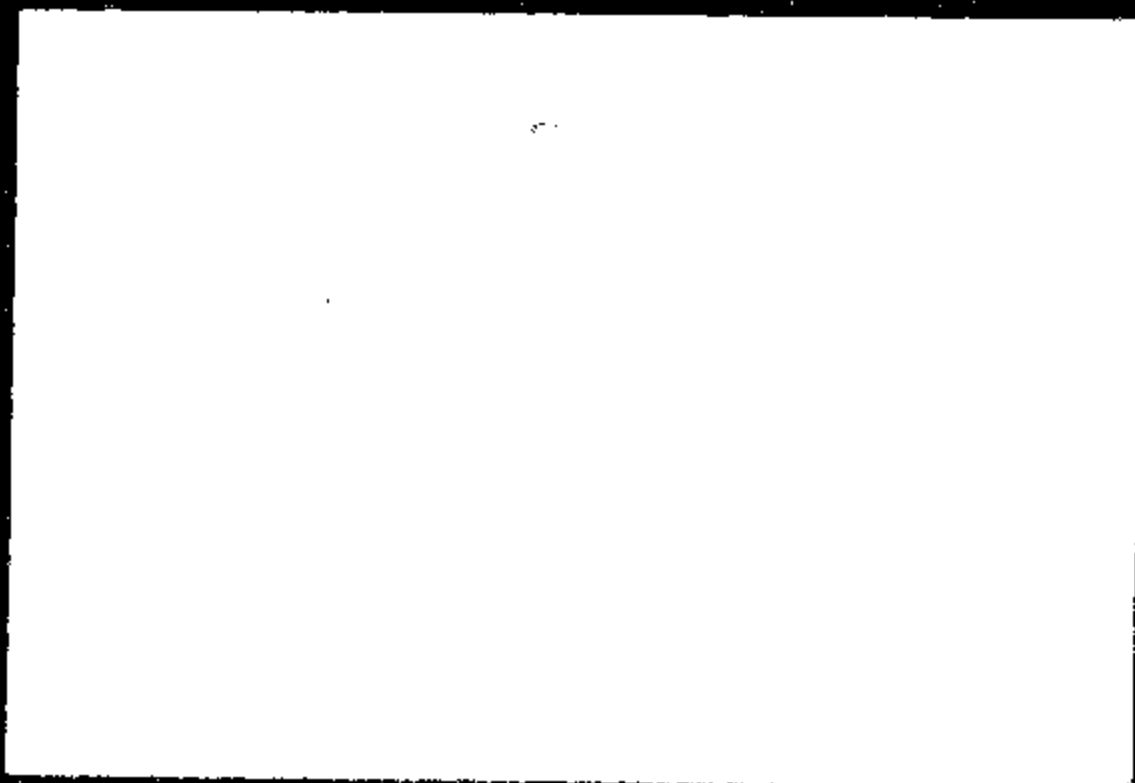


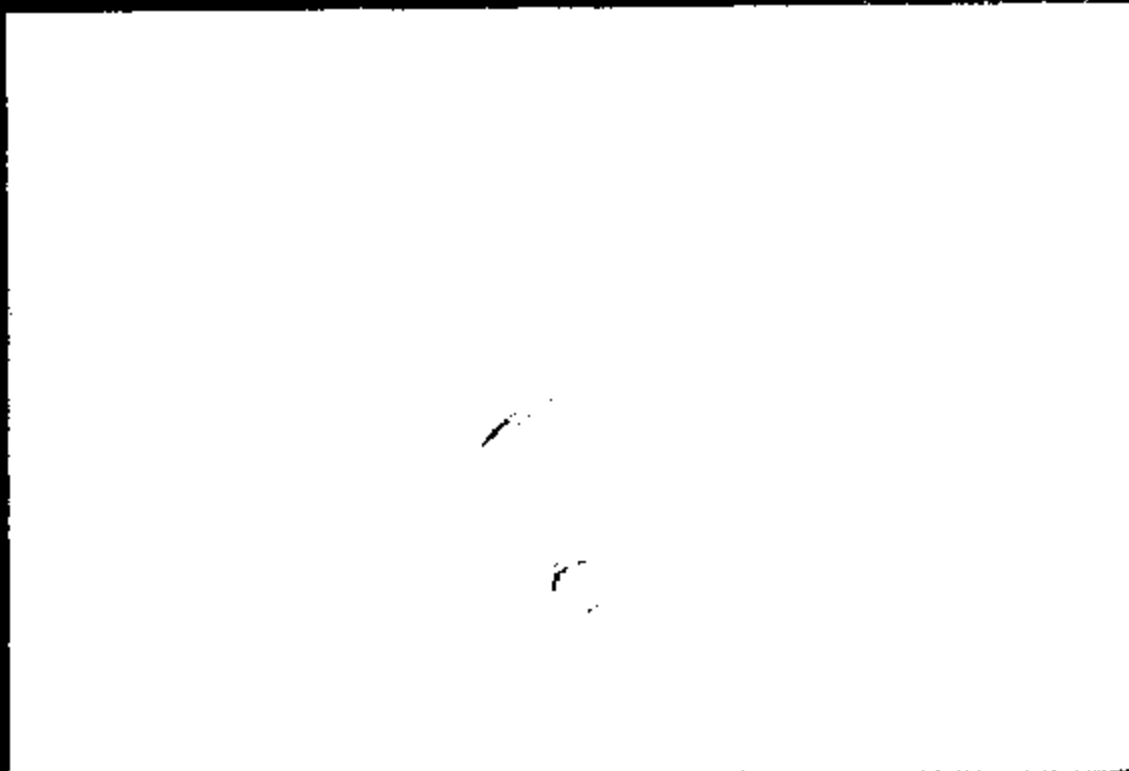




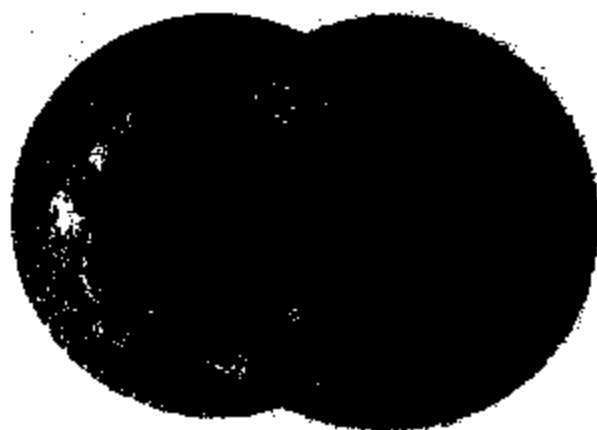


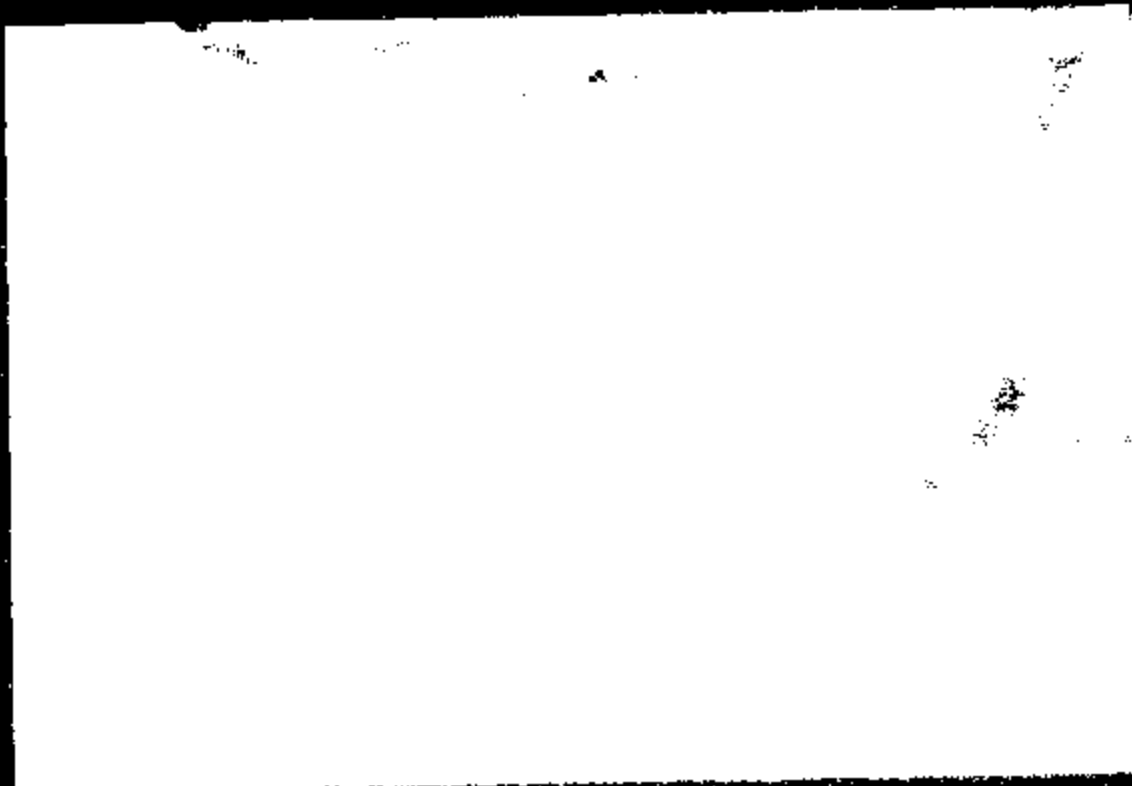


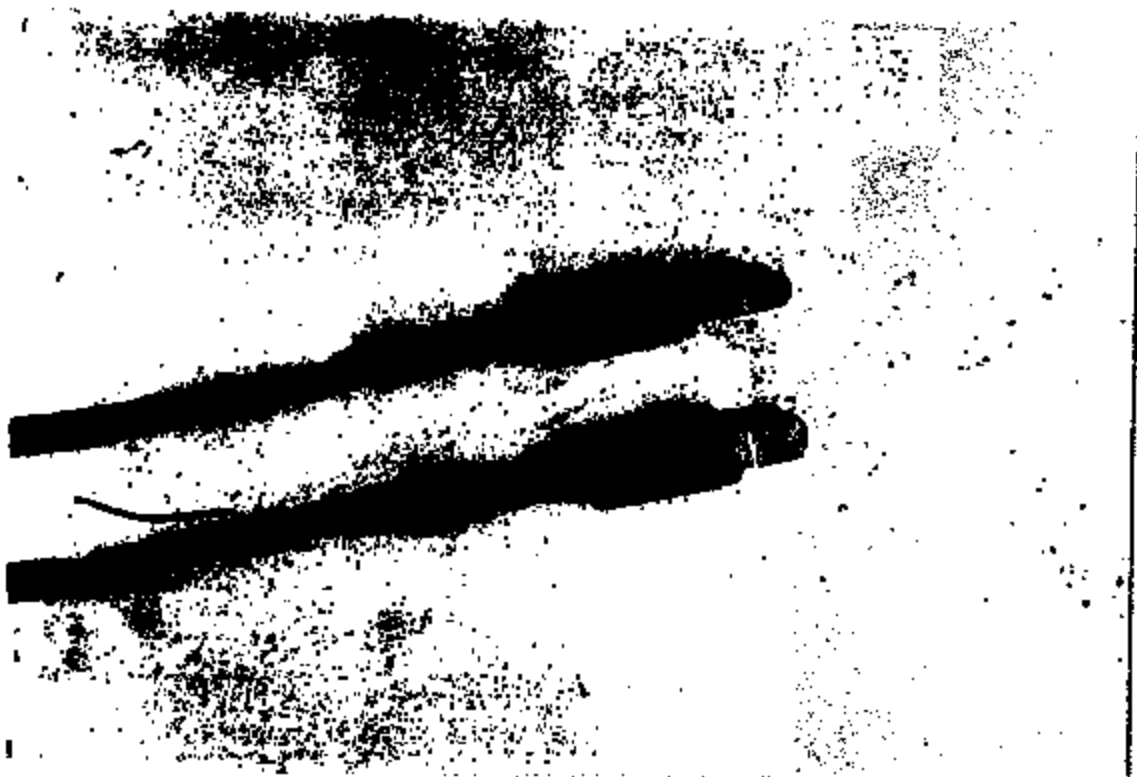






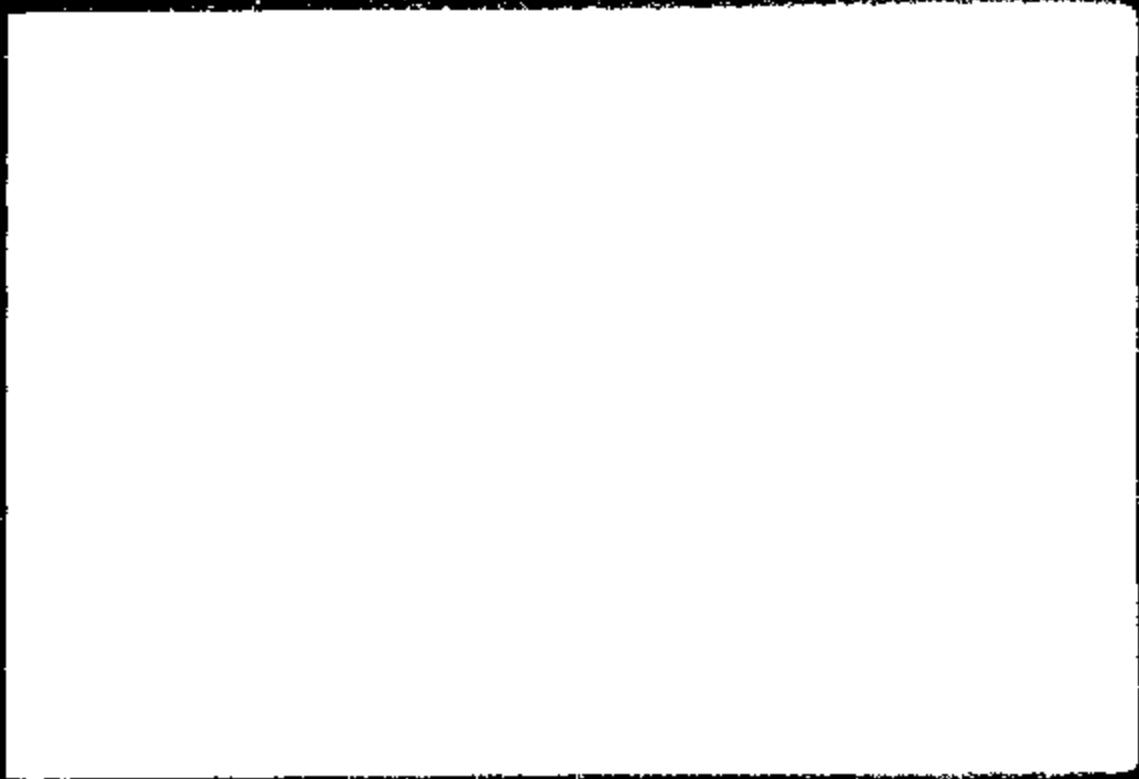
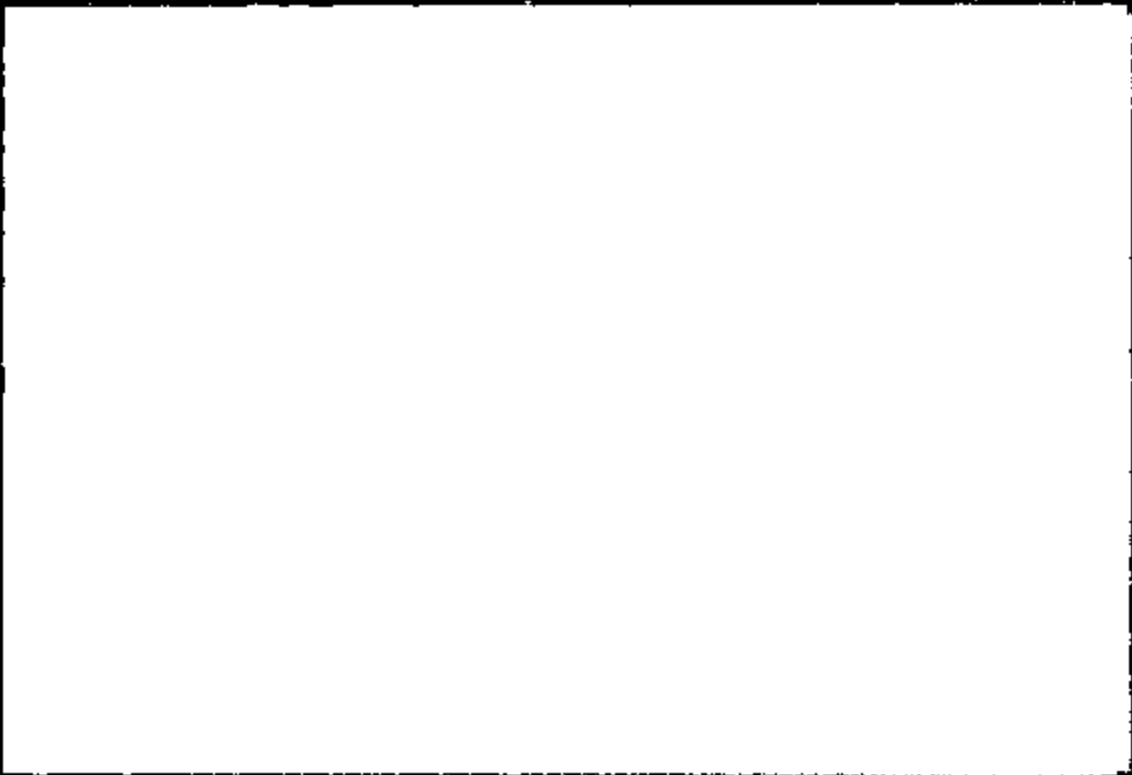


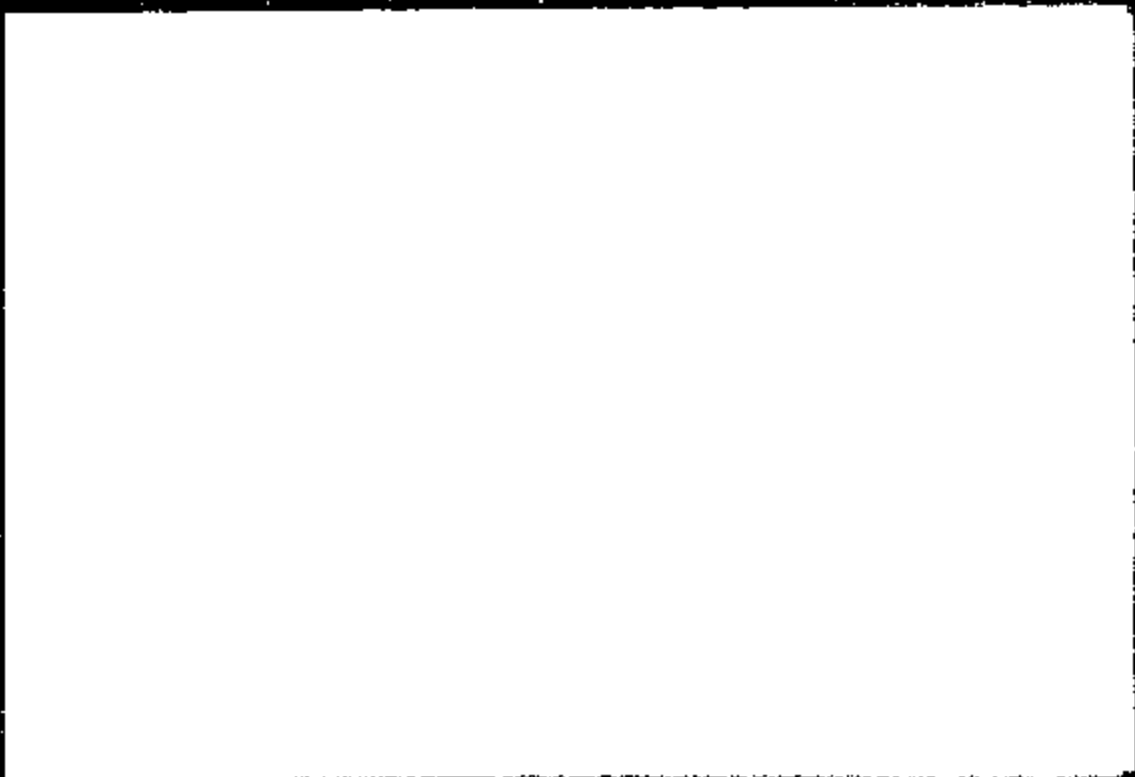






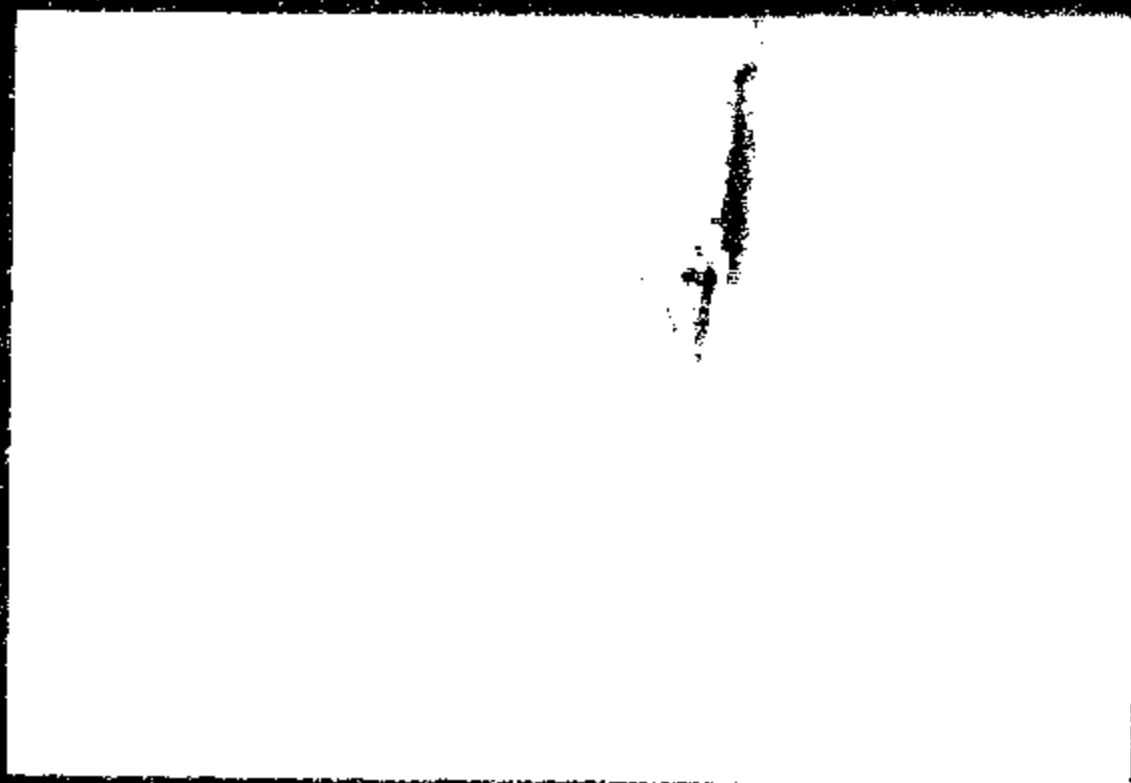




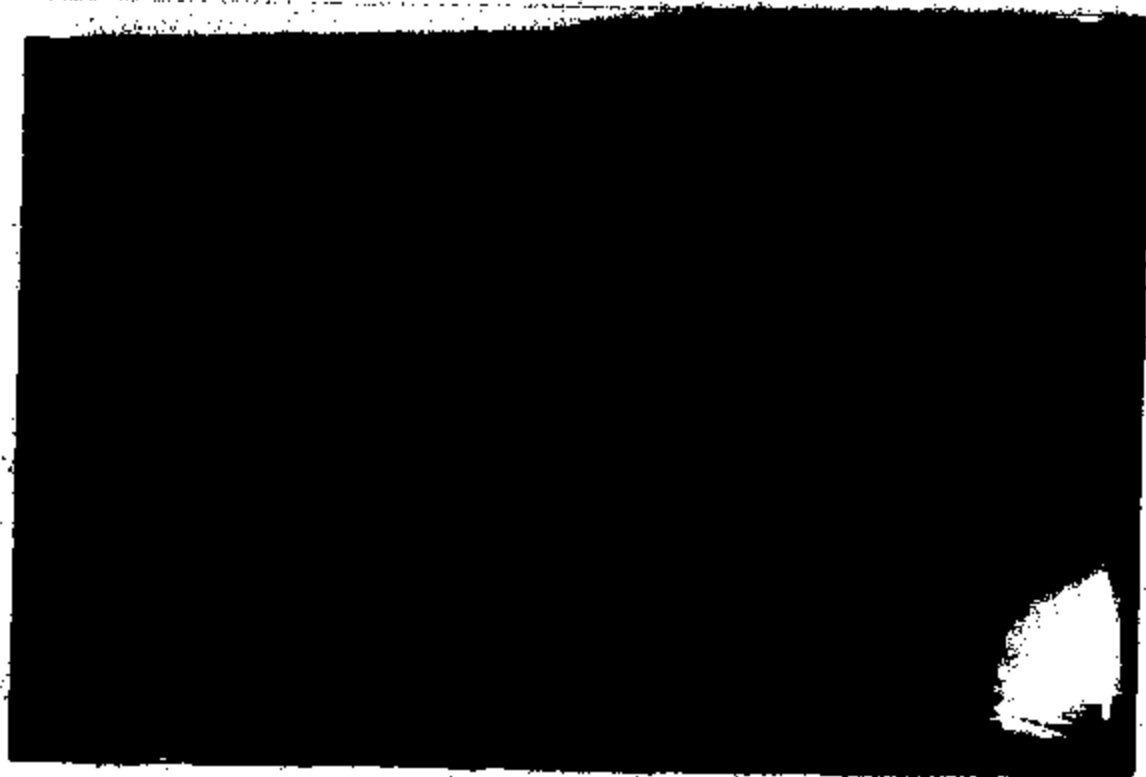




ERG-828 34471

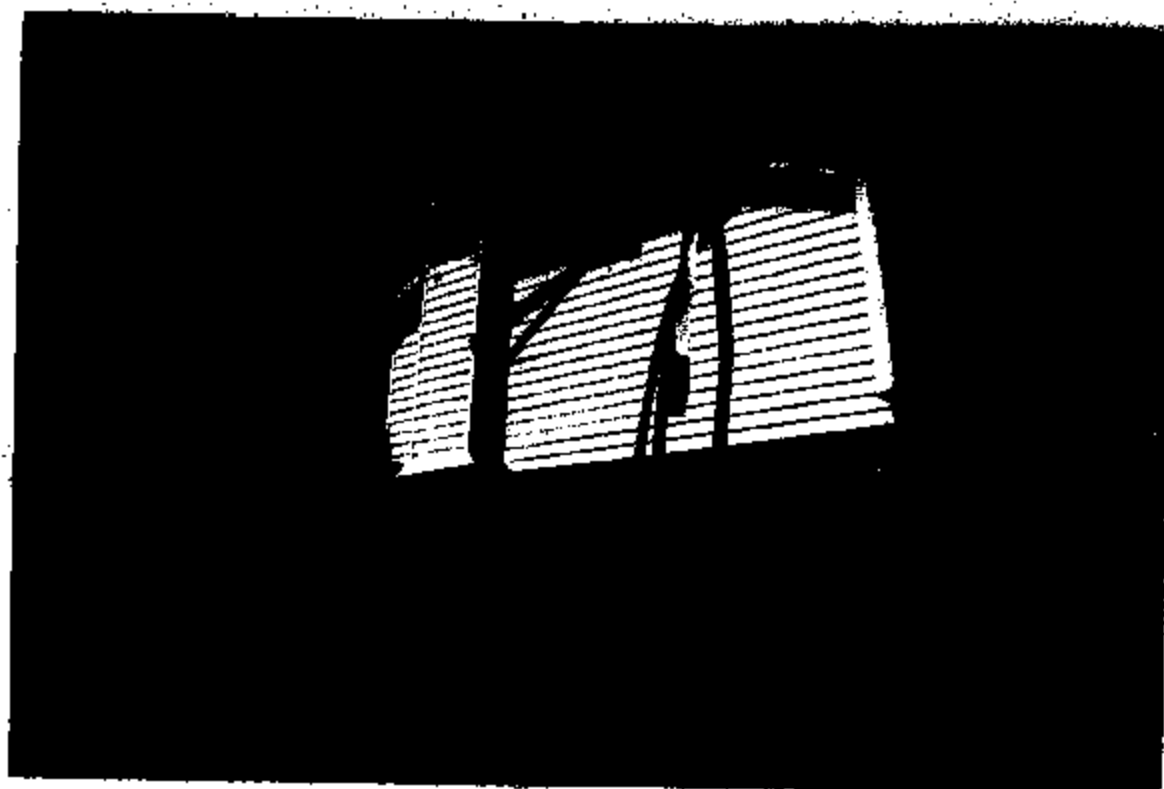




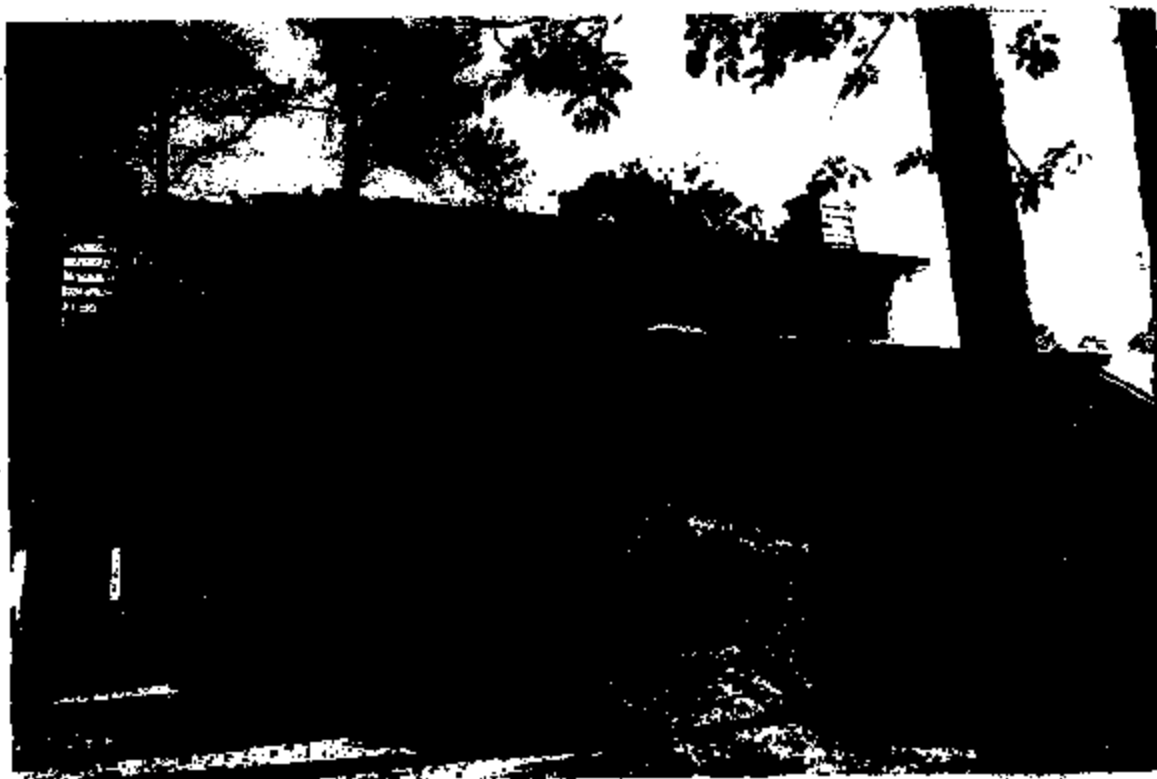
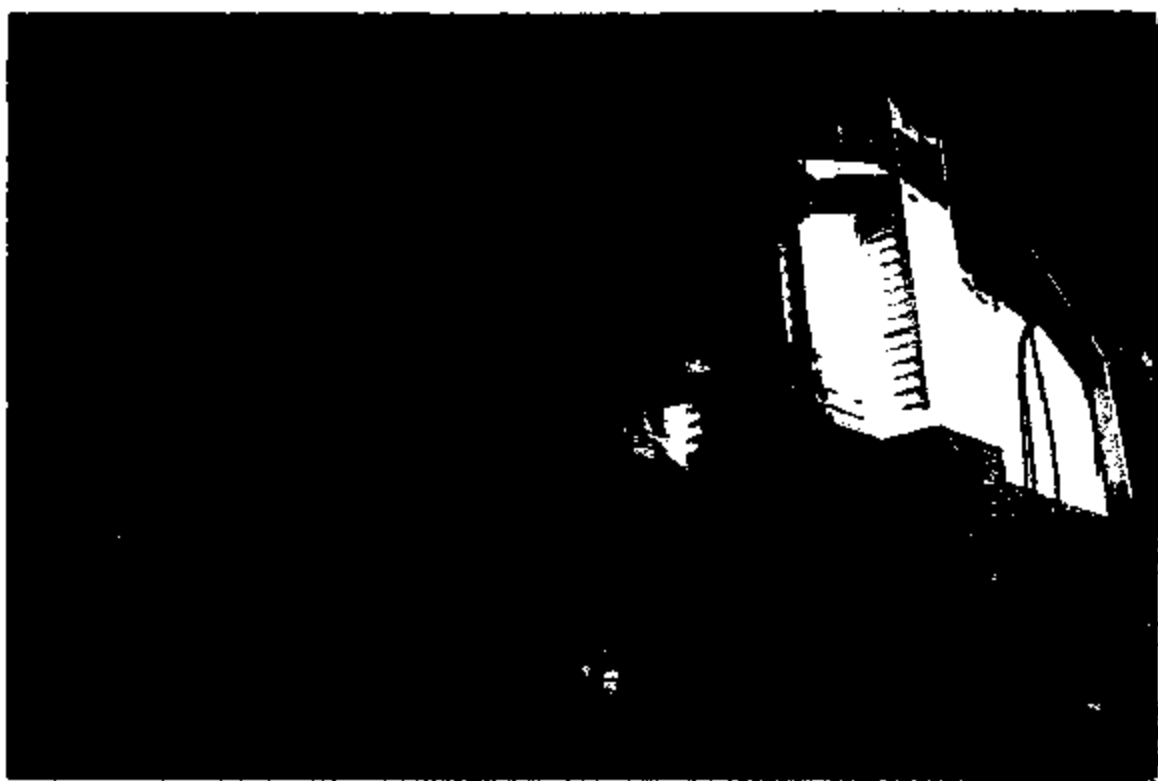






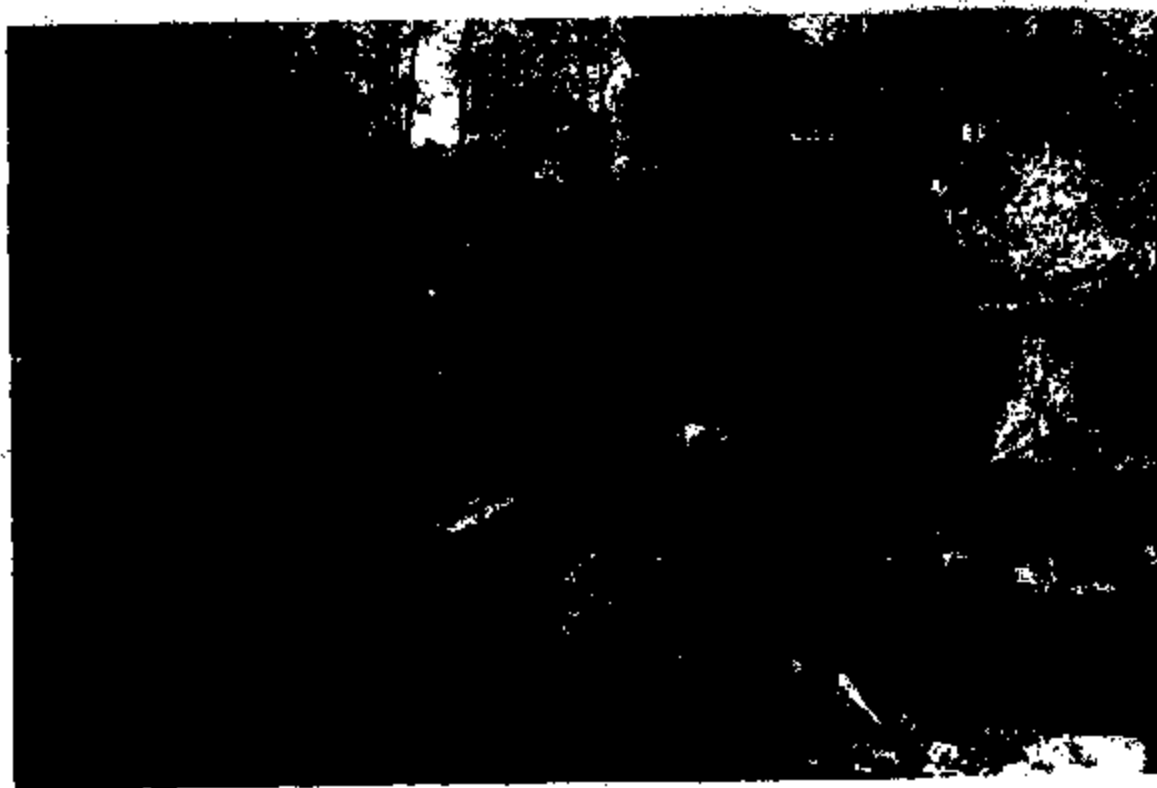


BR62-625 34477



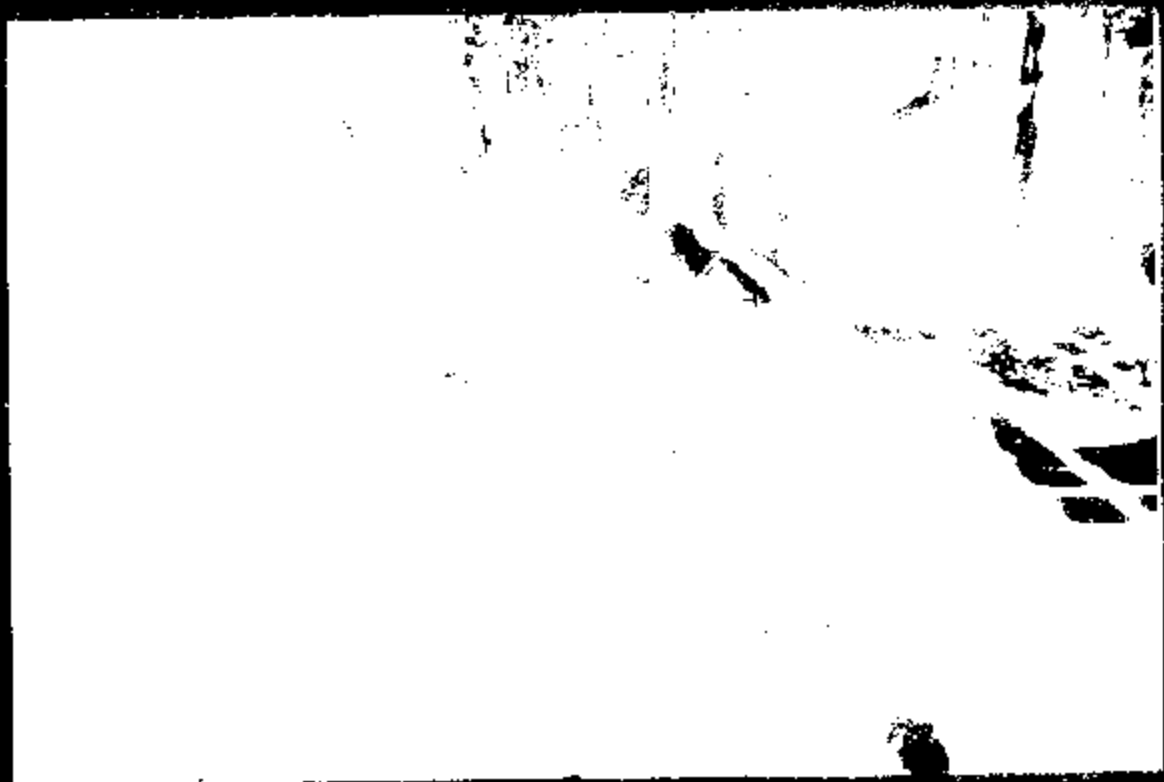


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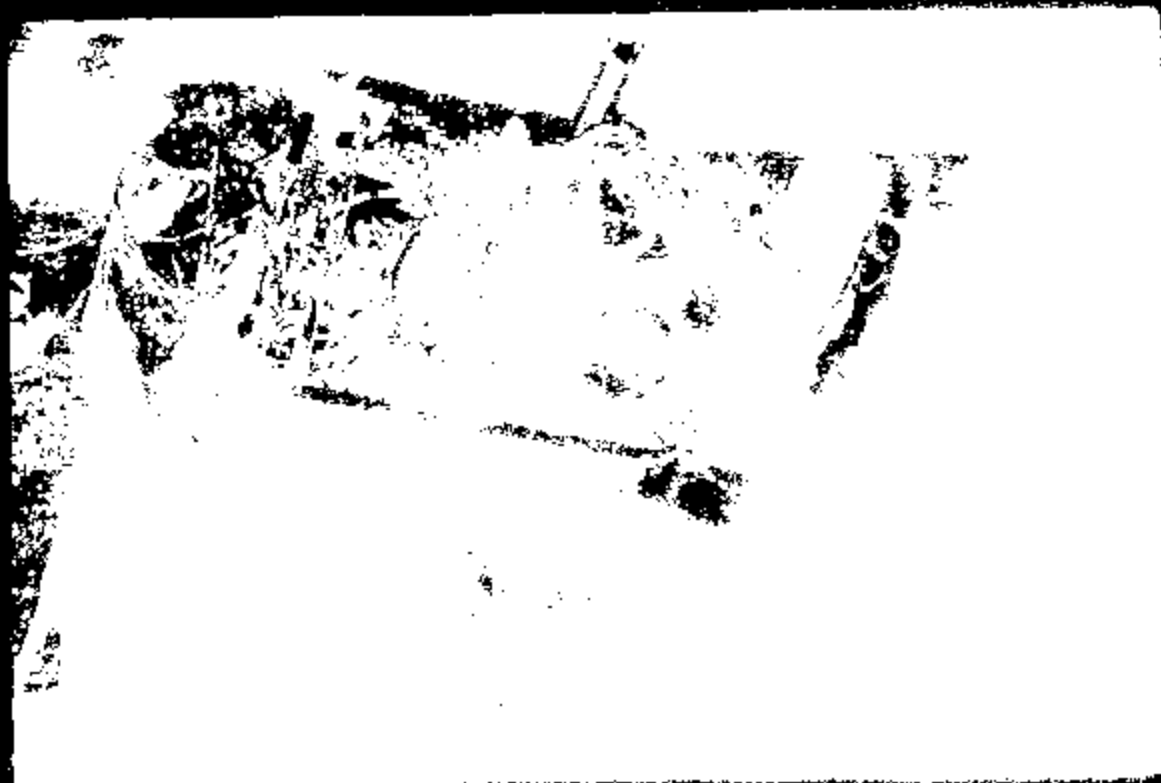


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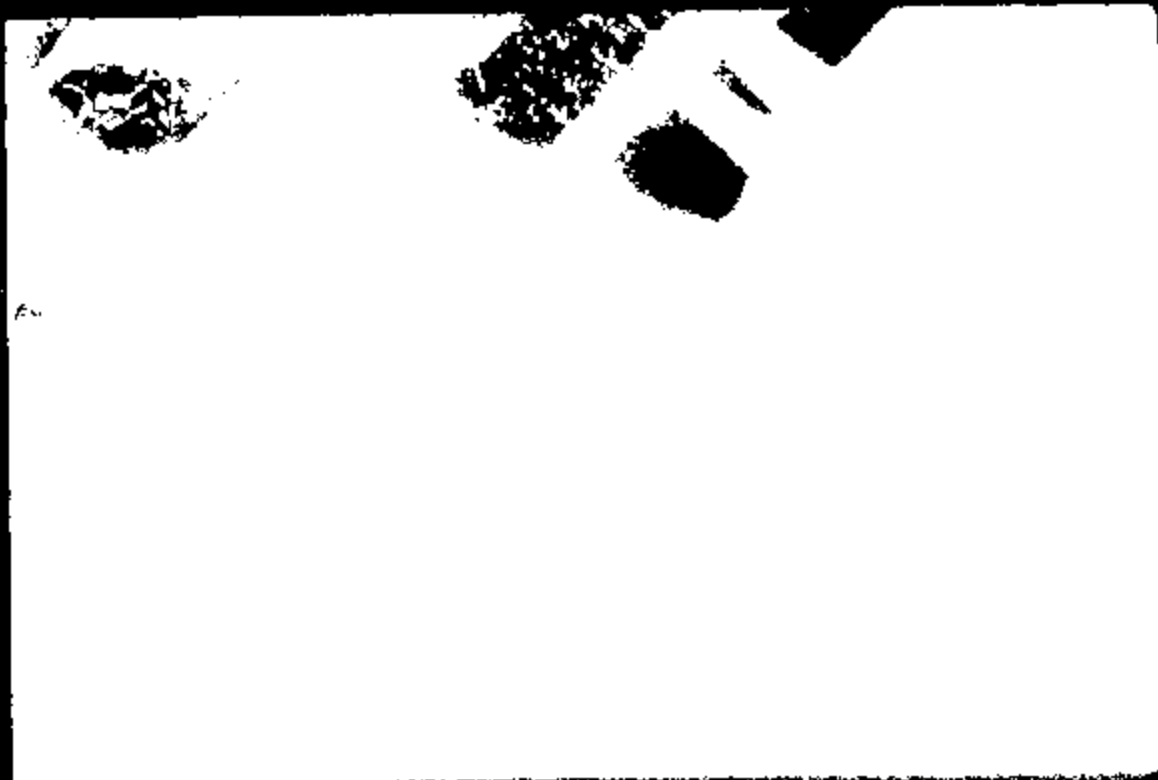




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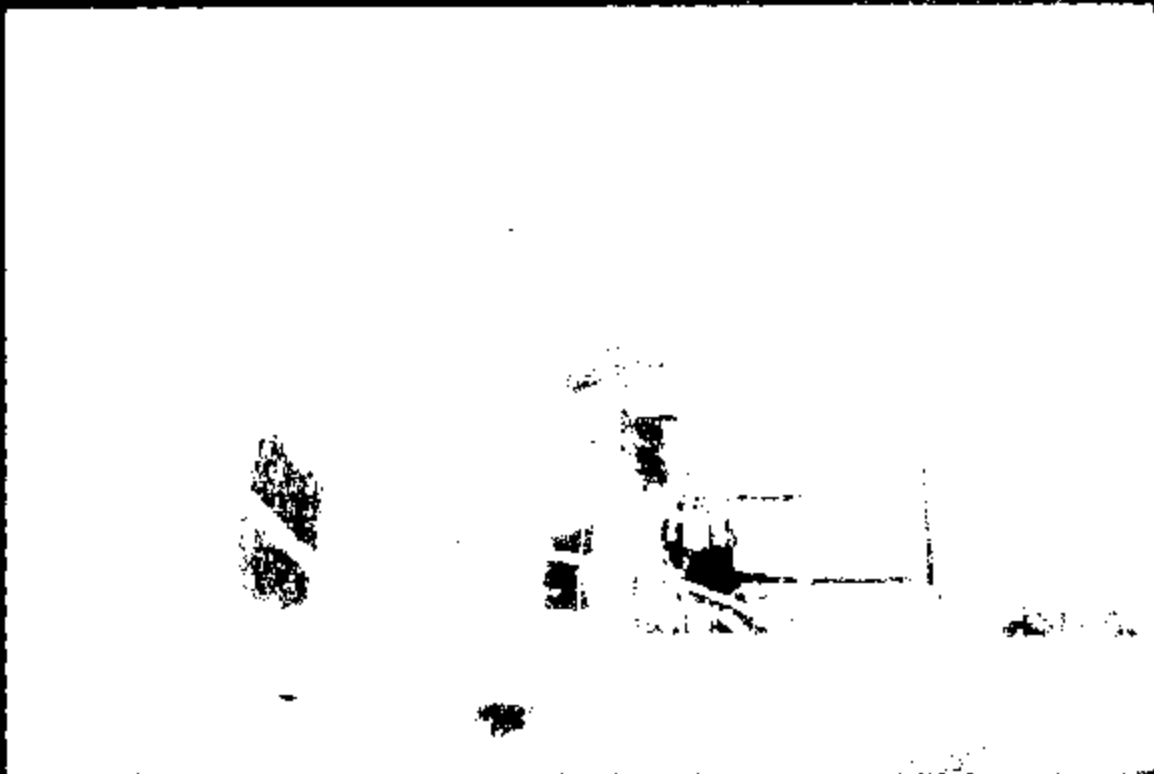
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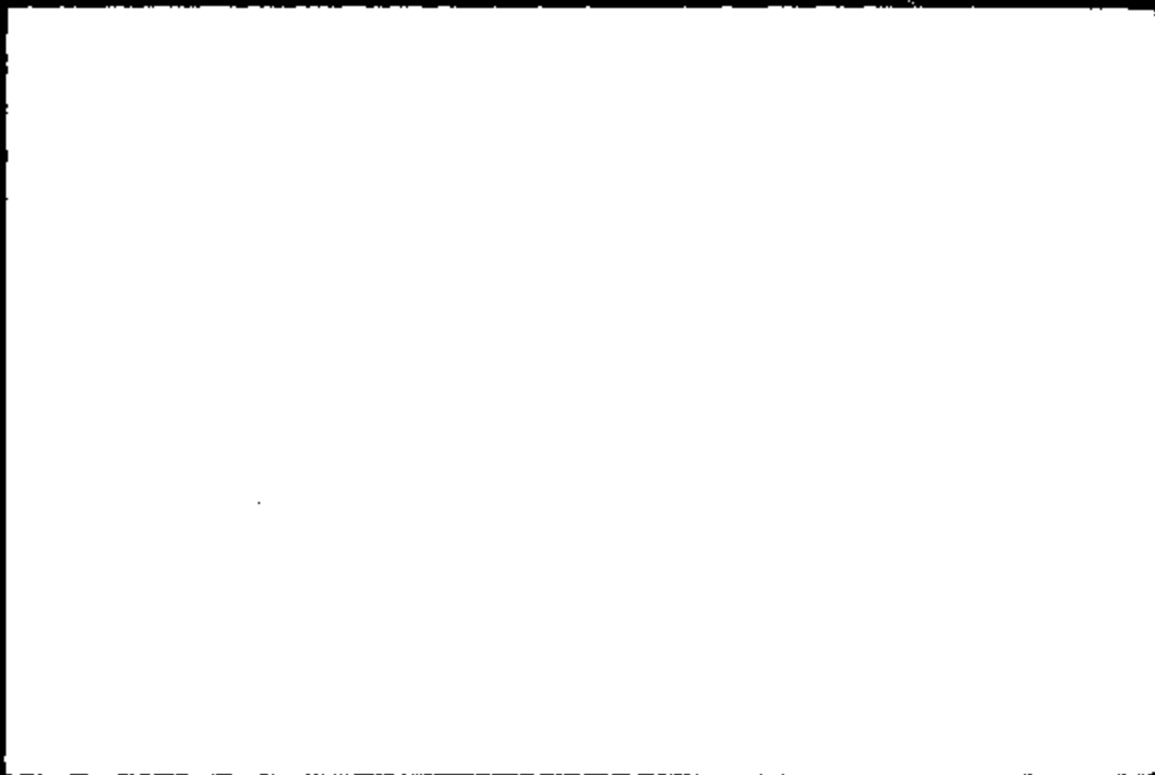


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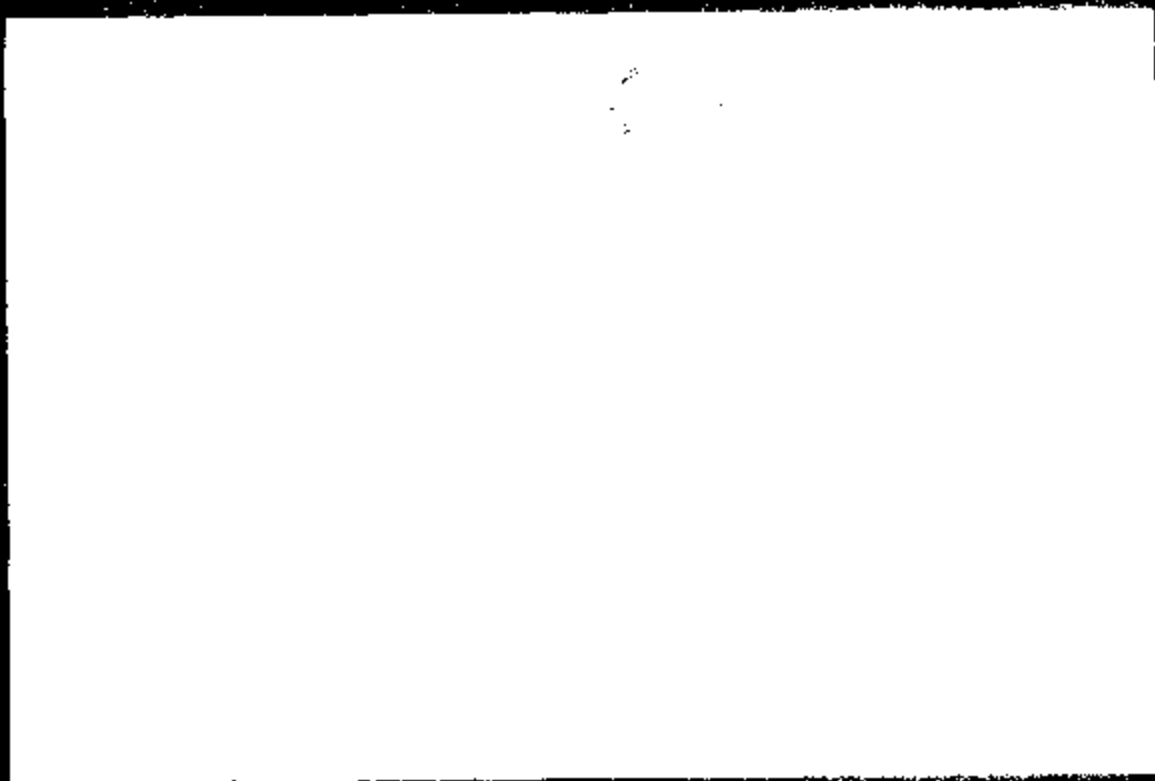
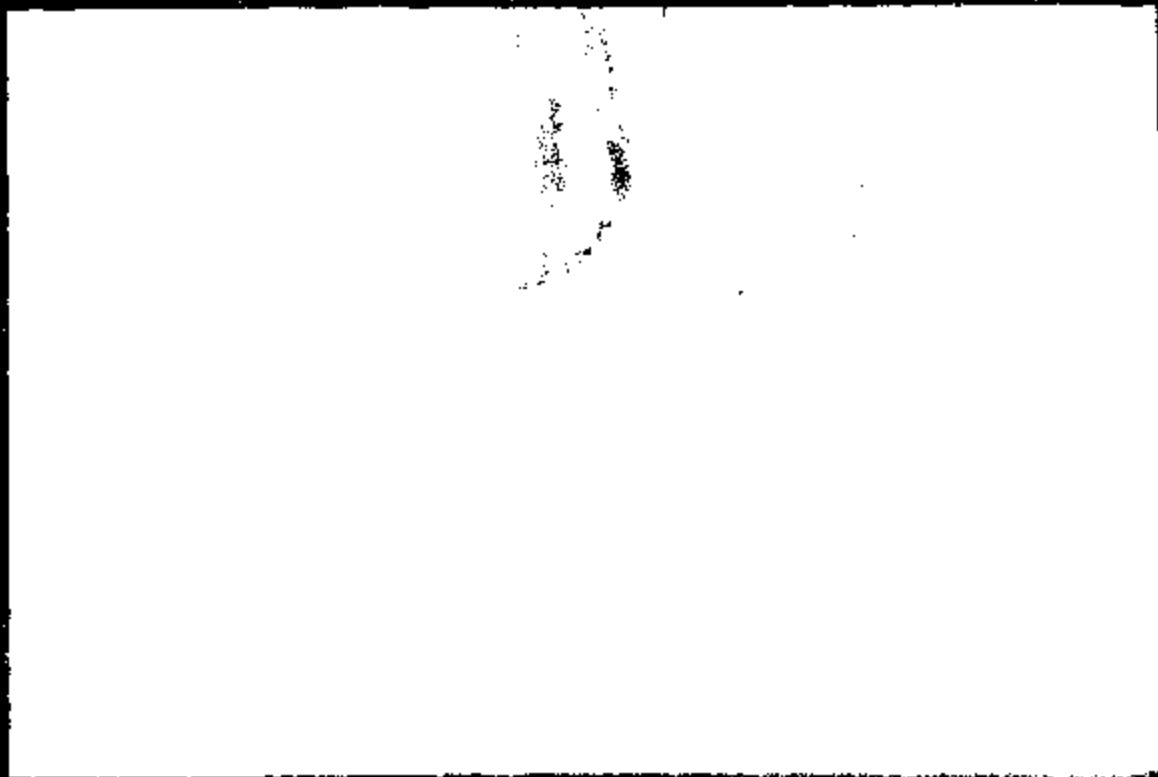


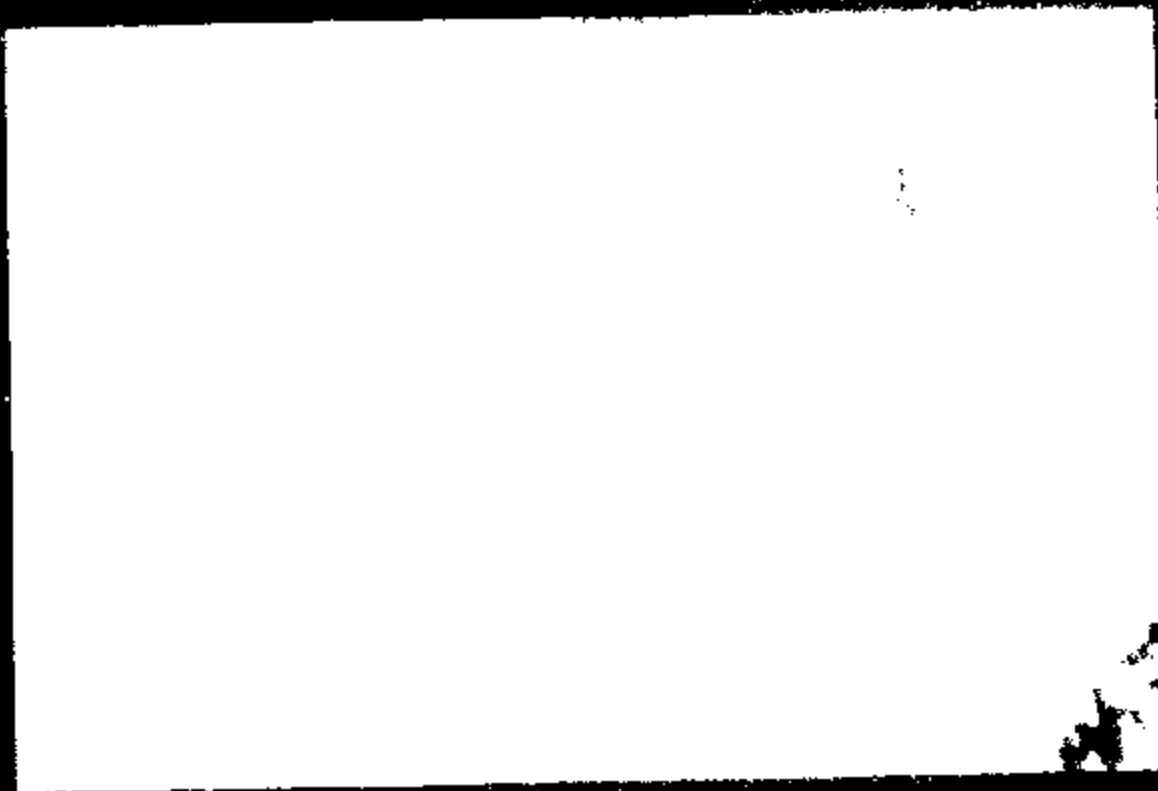
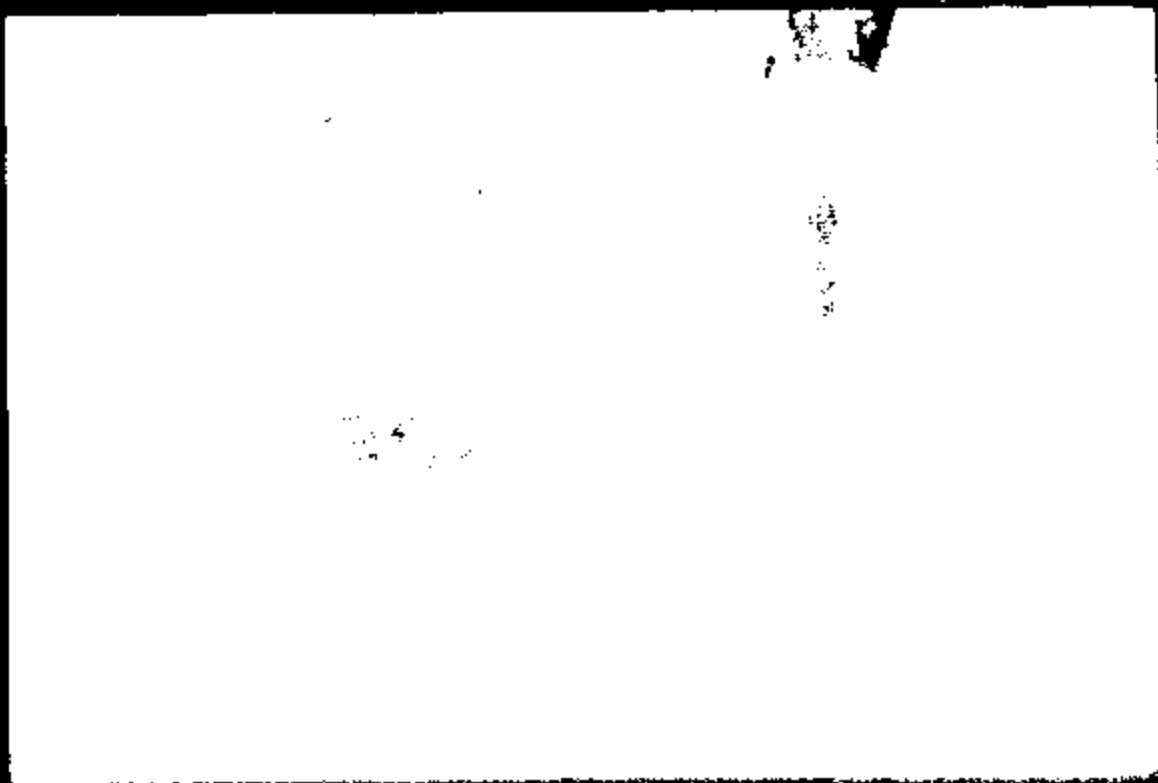
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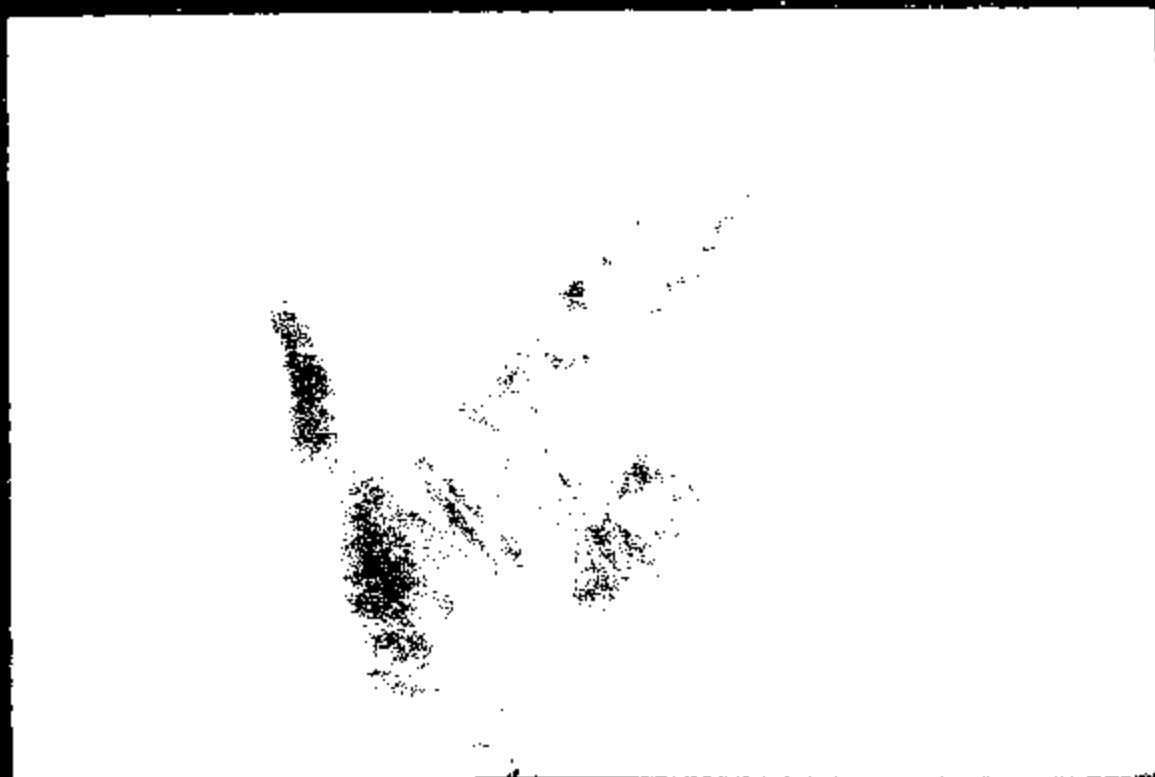


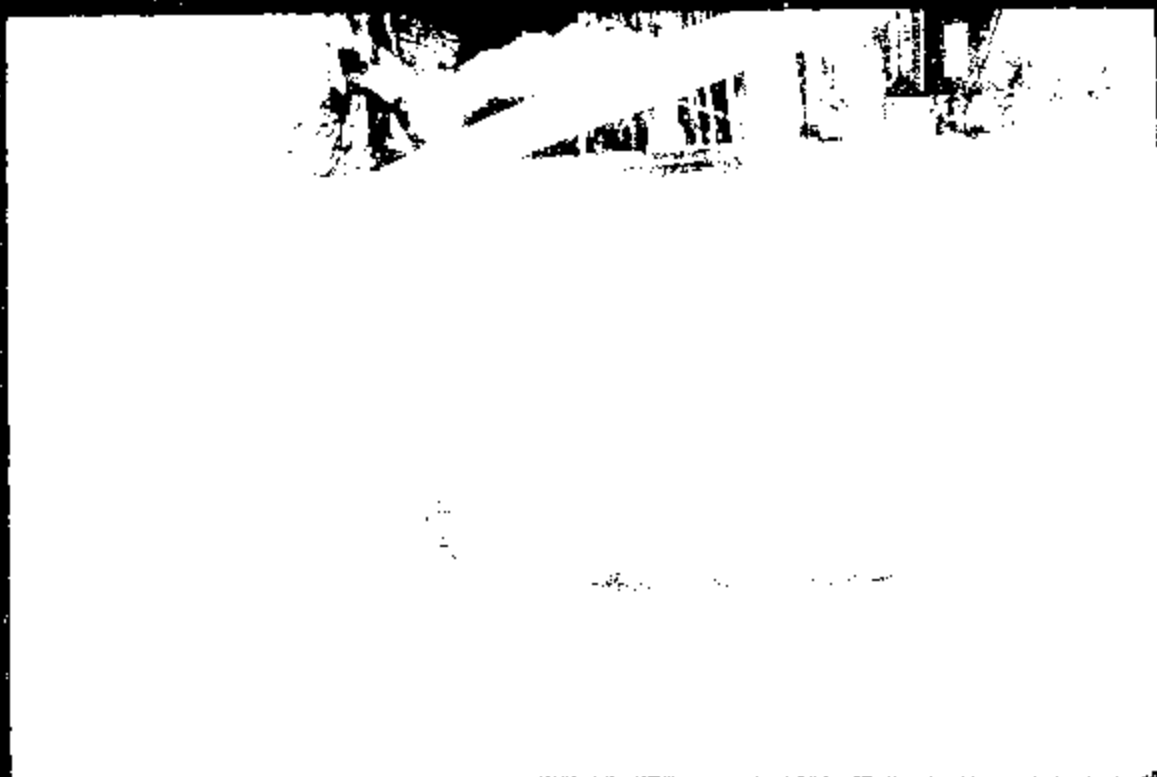


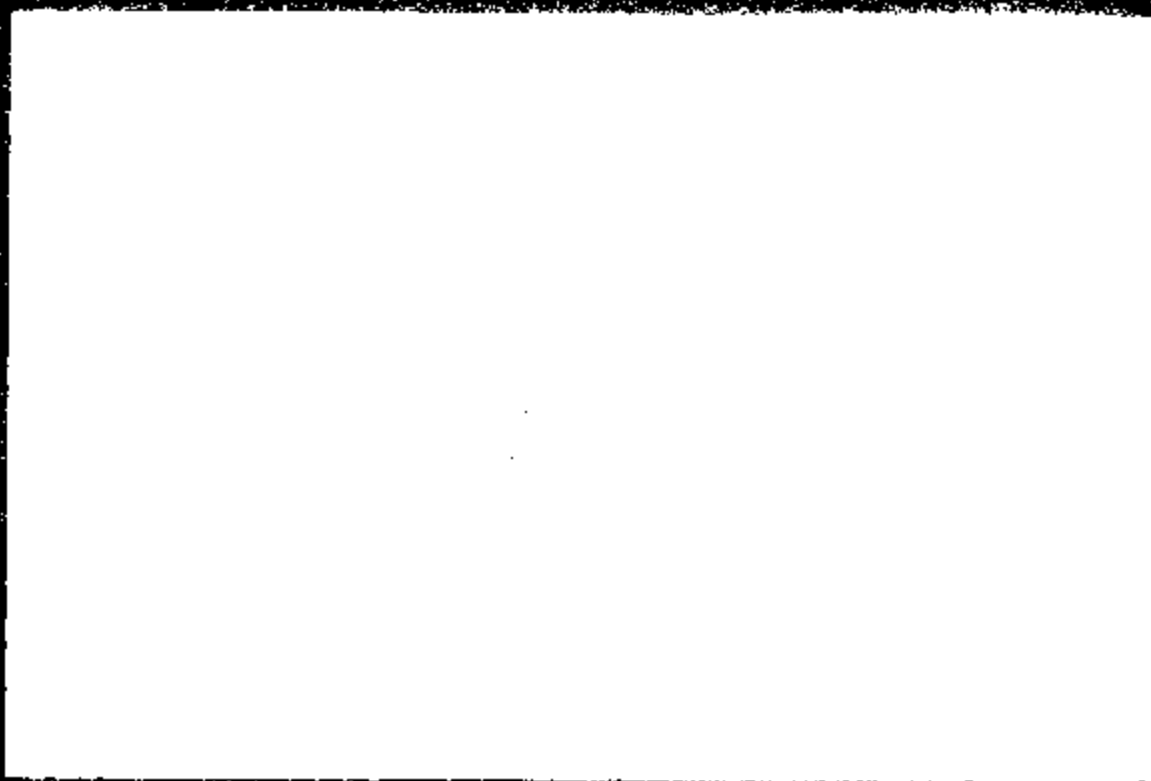
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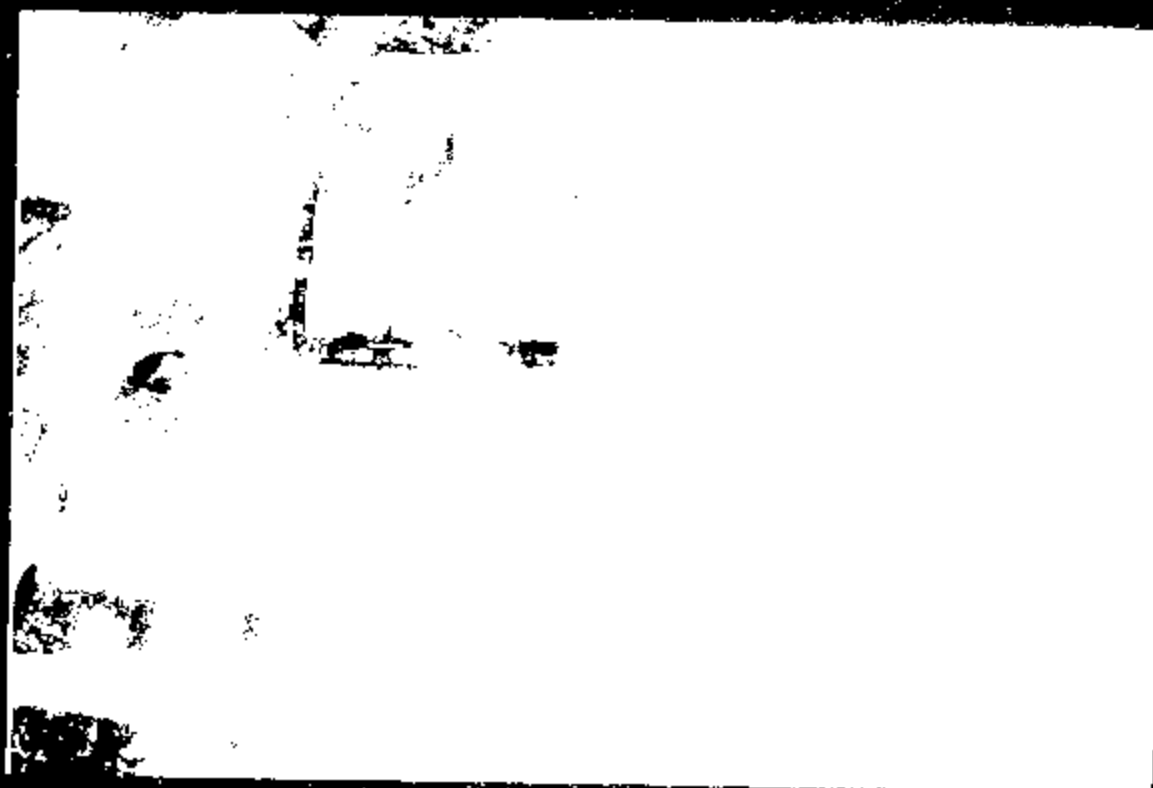
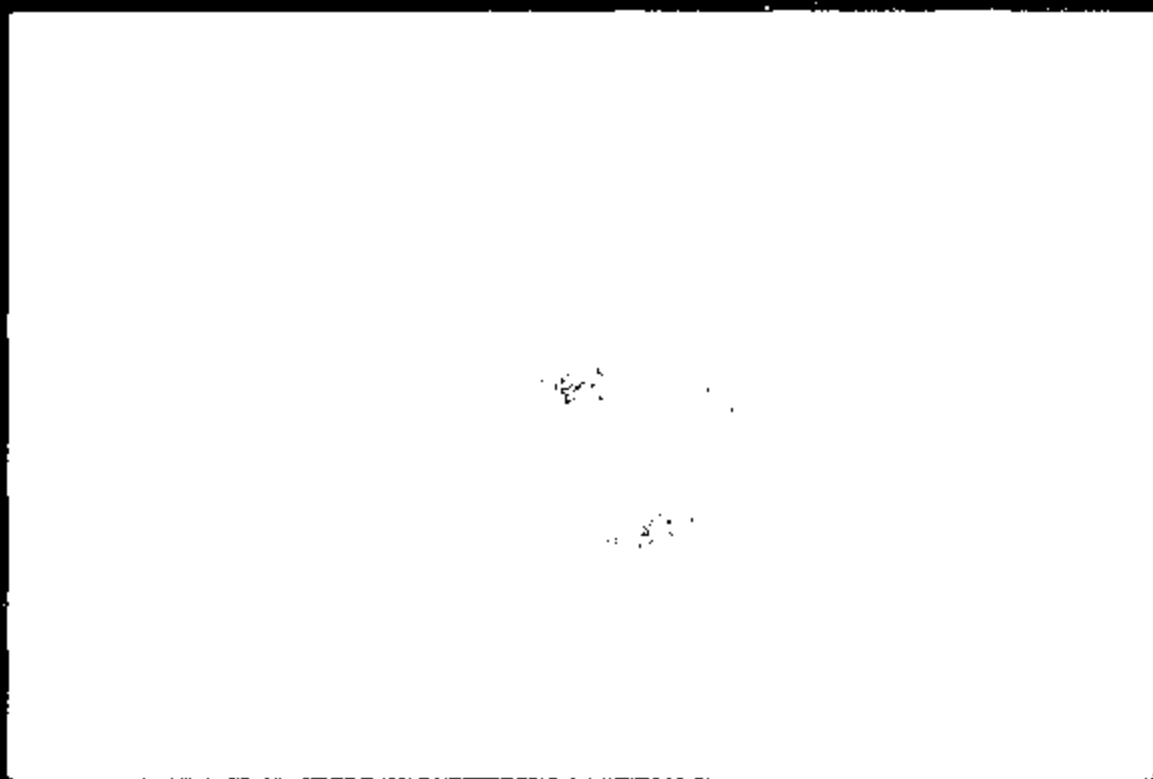


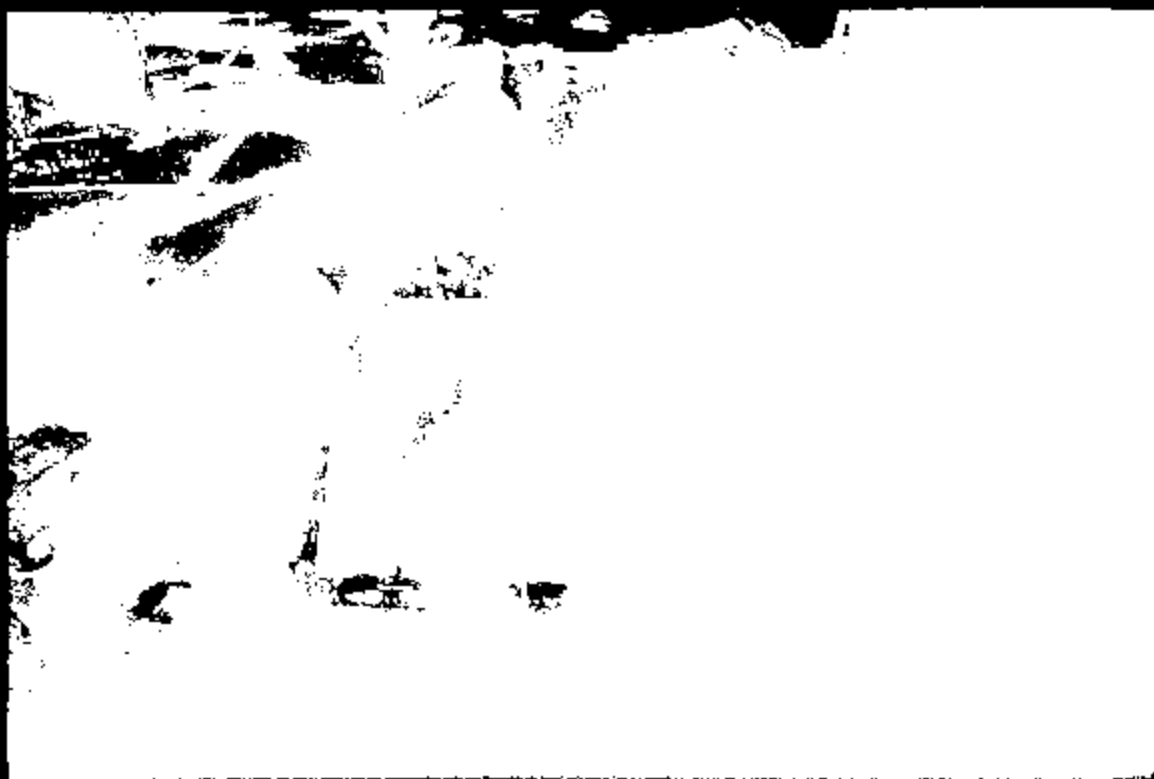


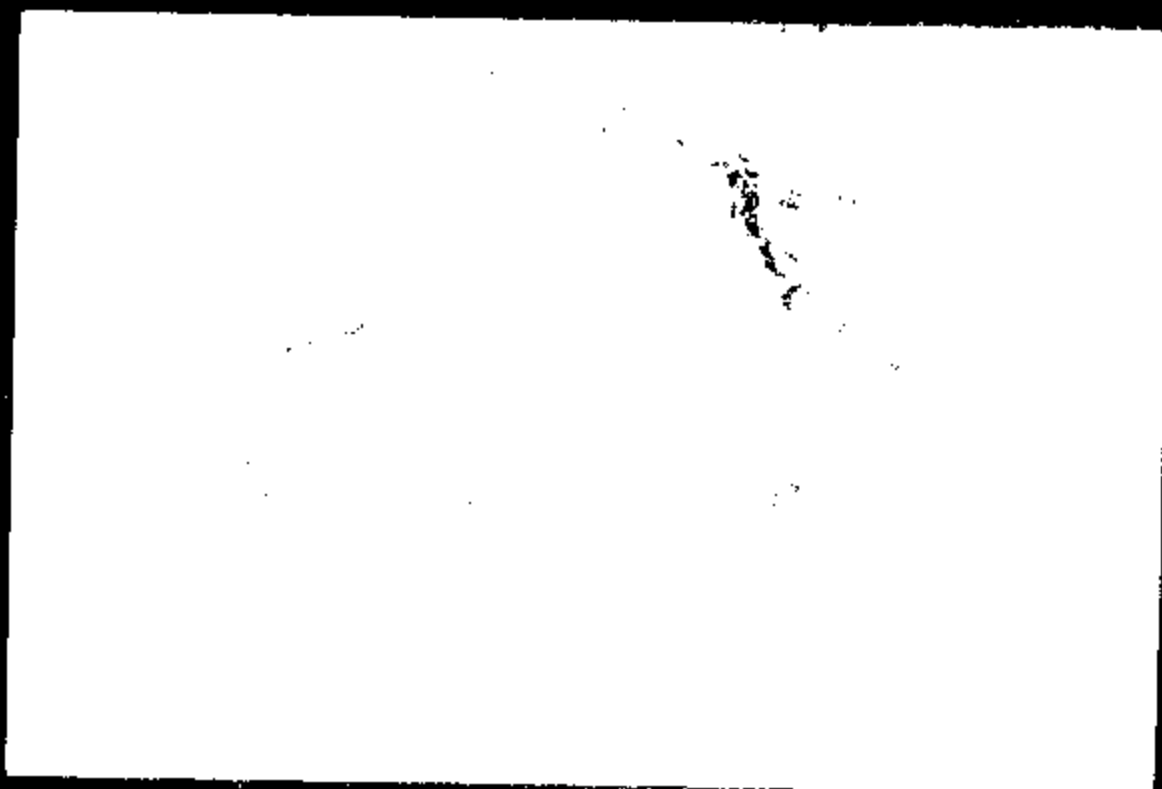










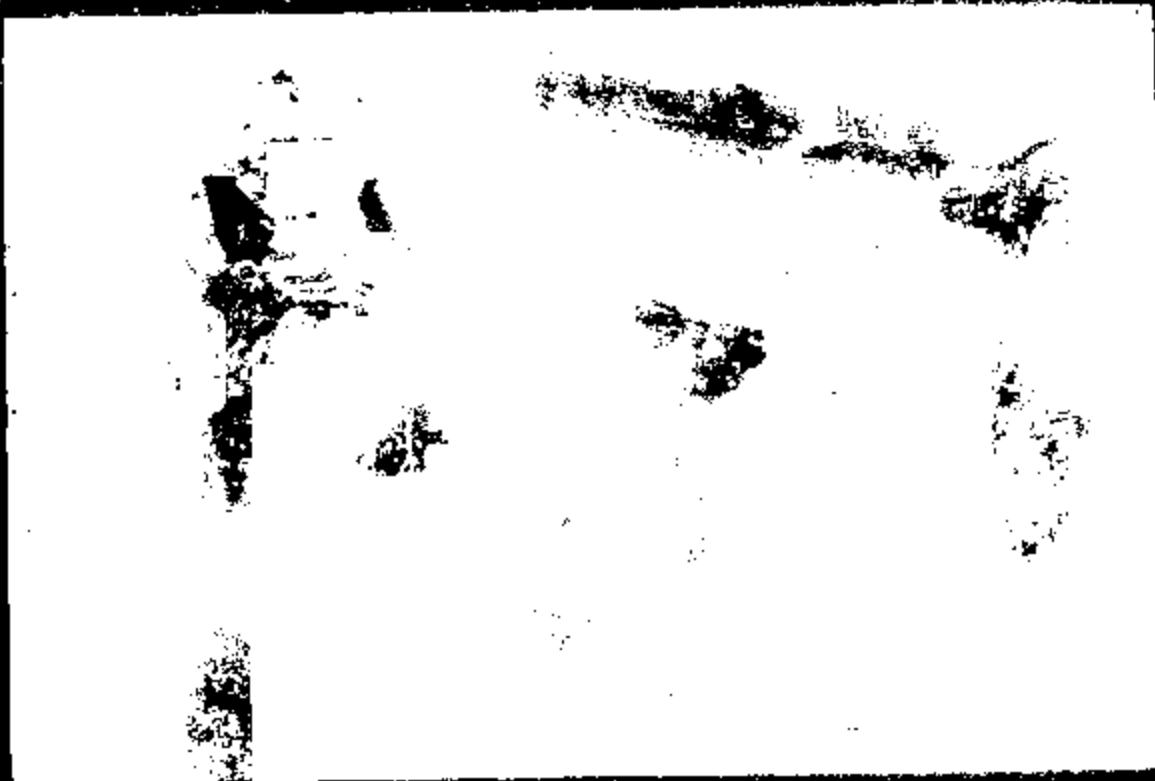


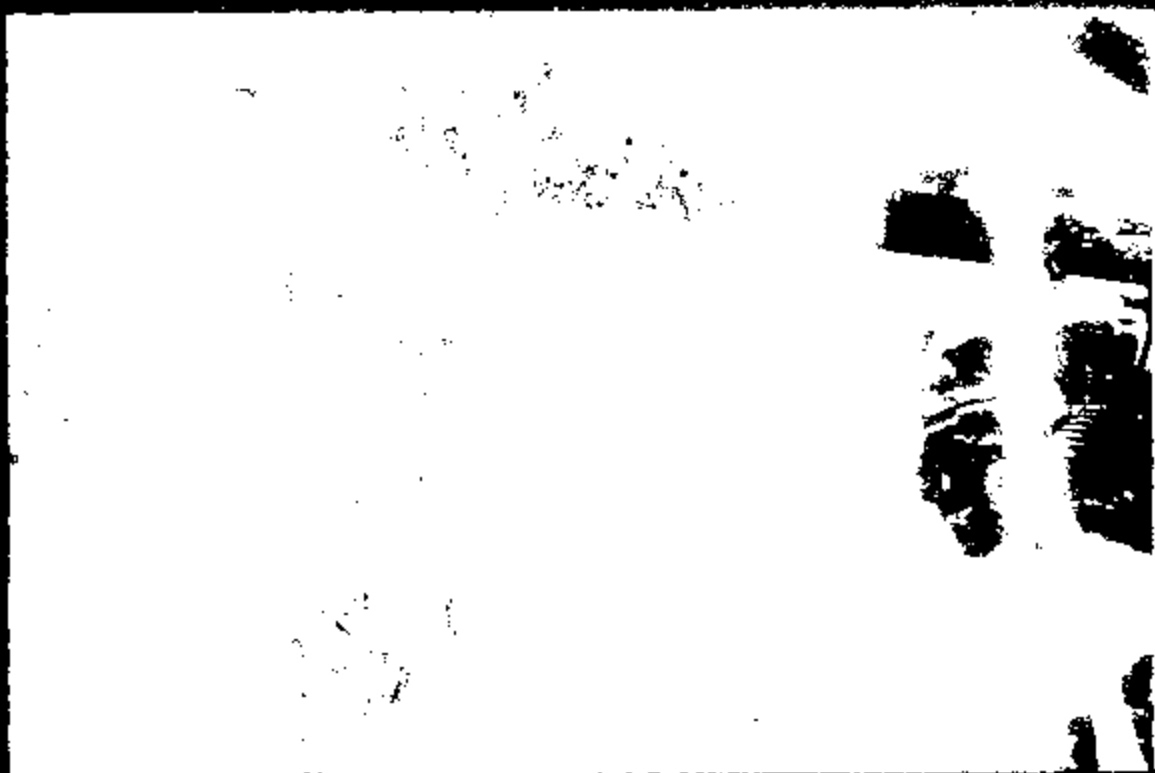
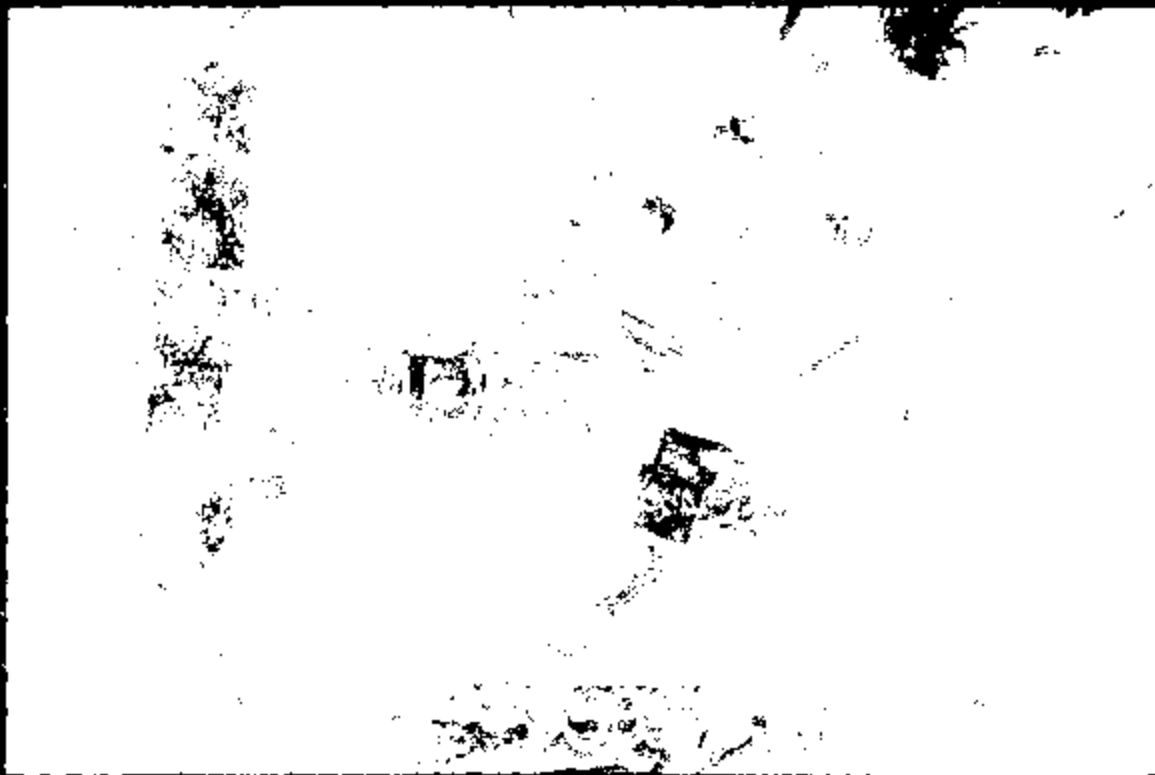


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ER92-825 34466





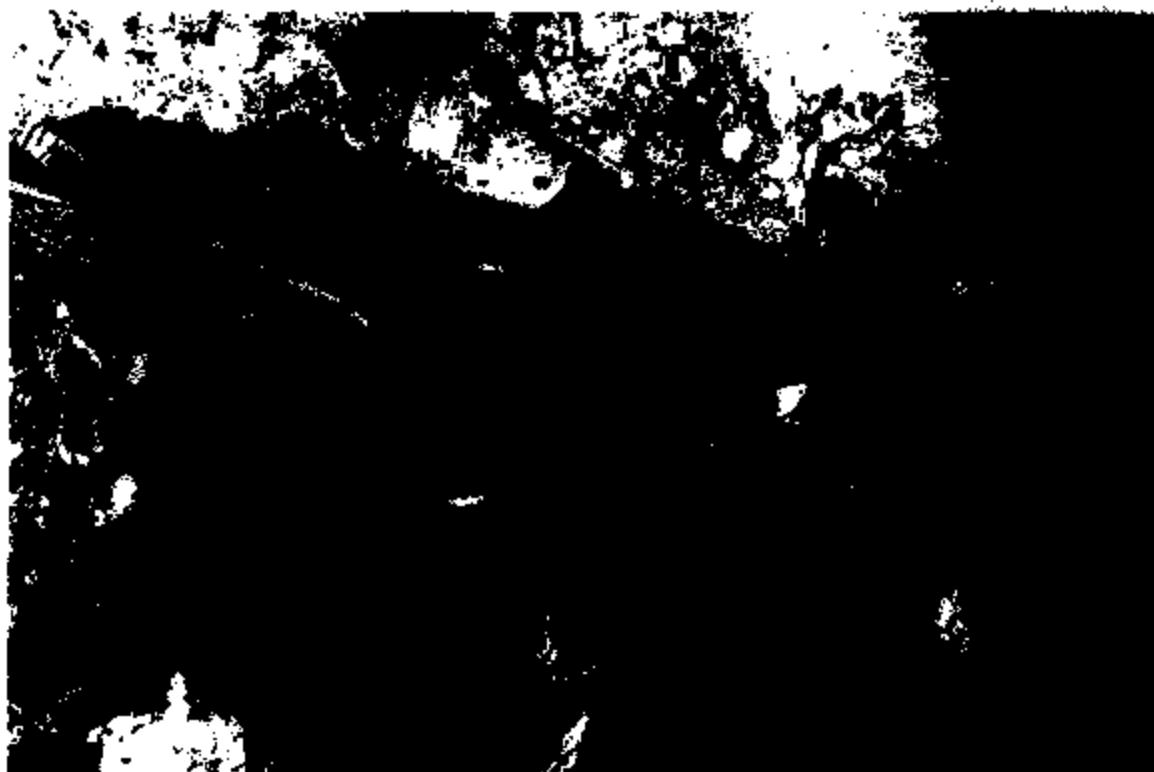


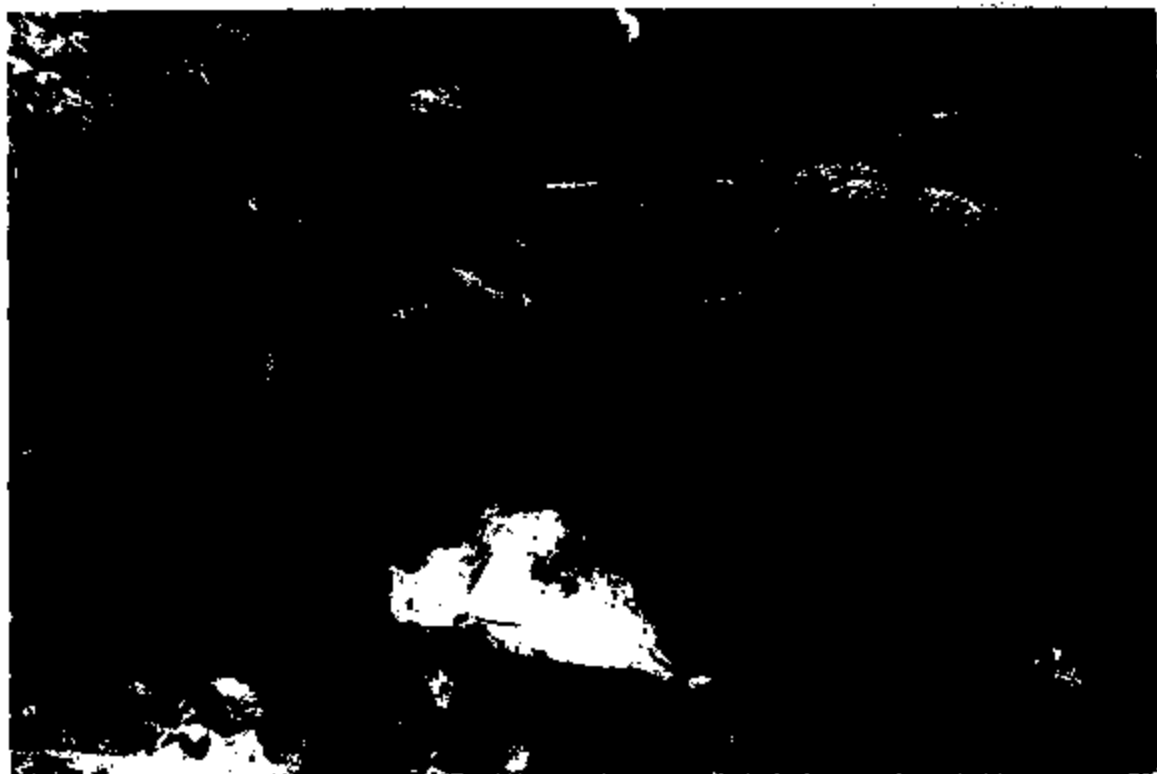


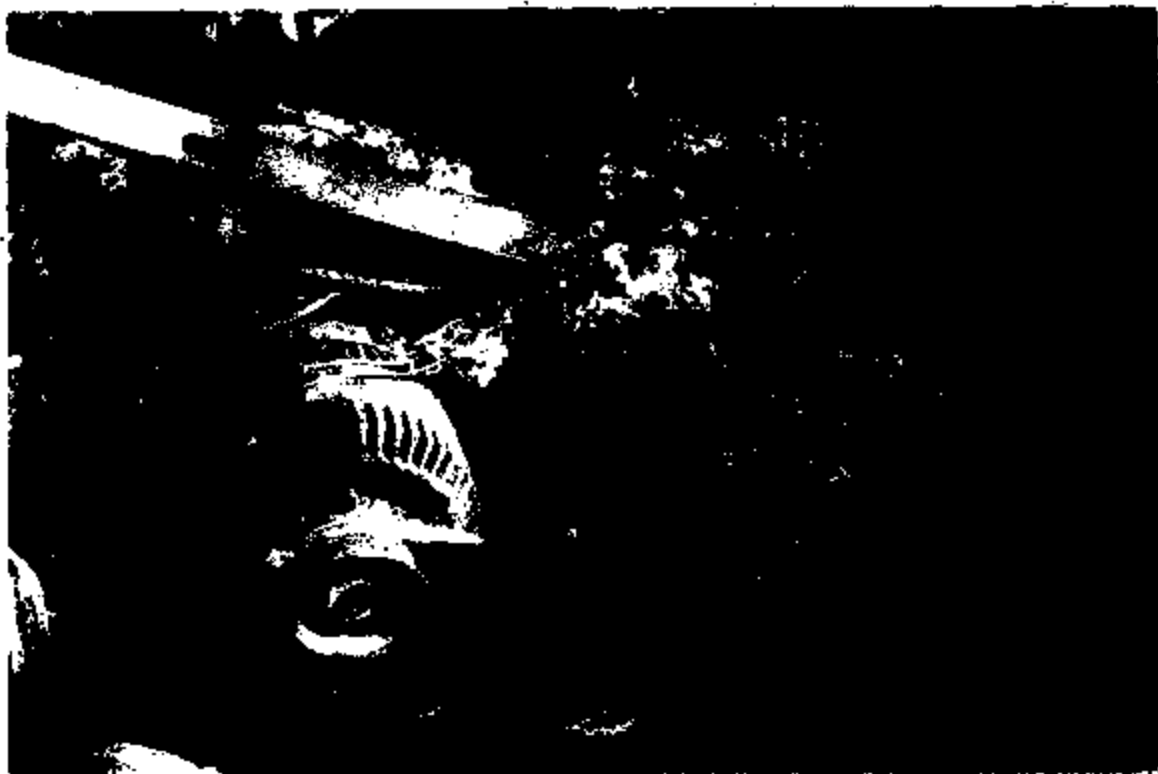
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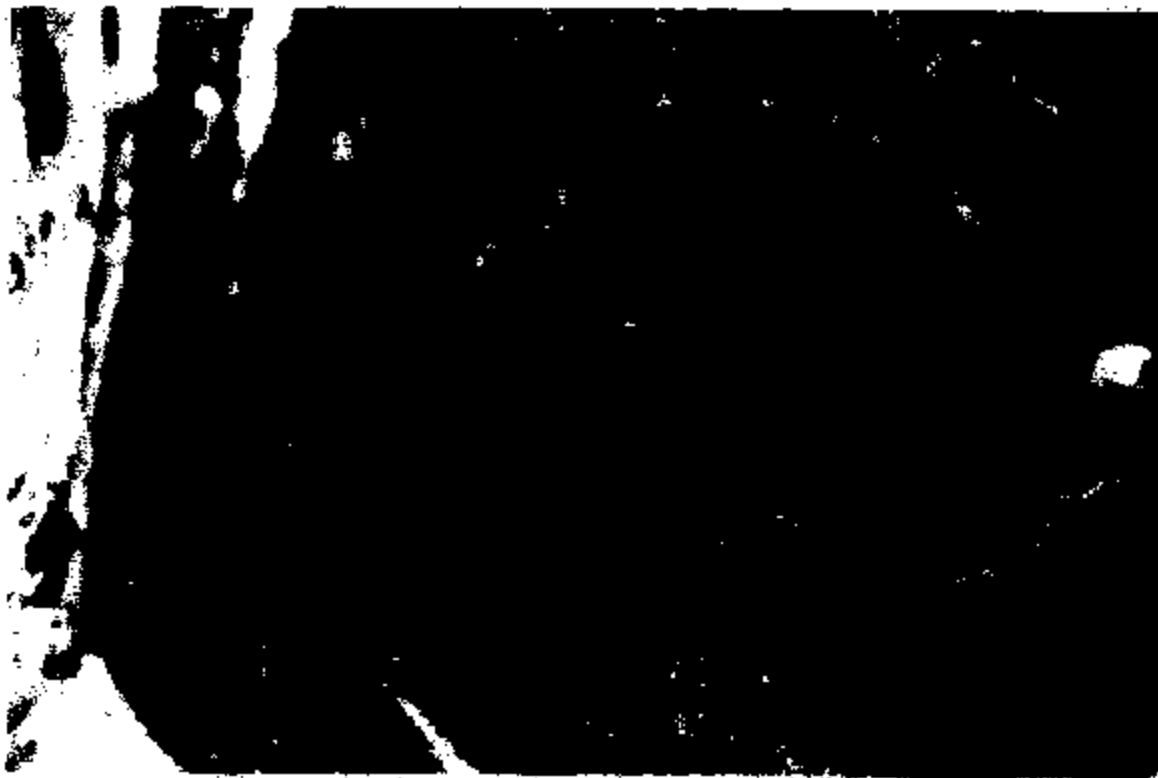


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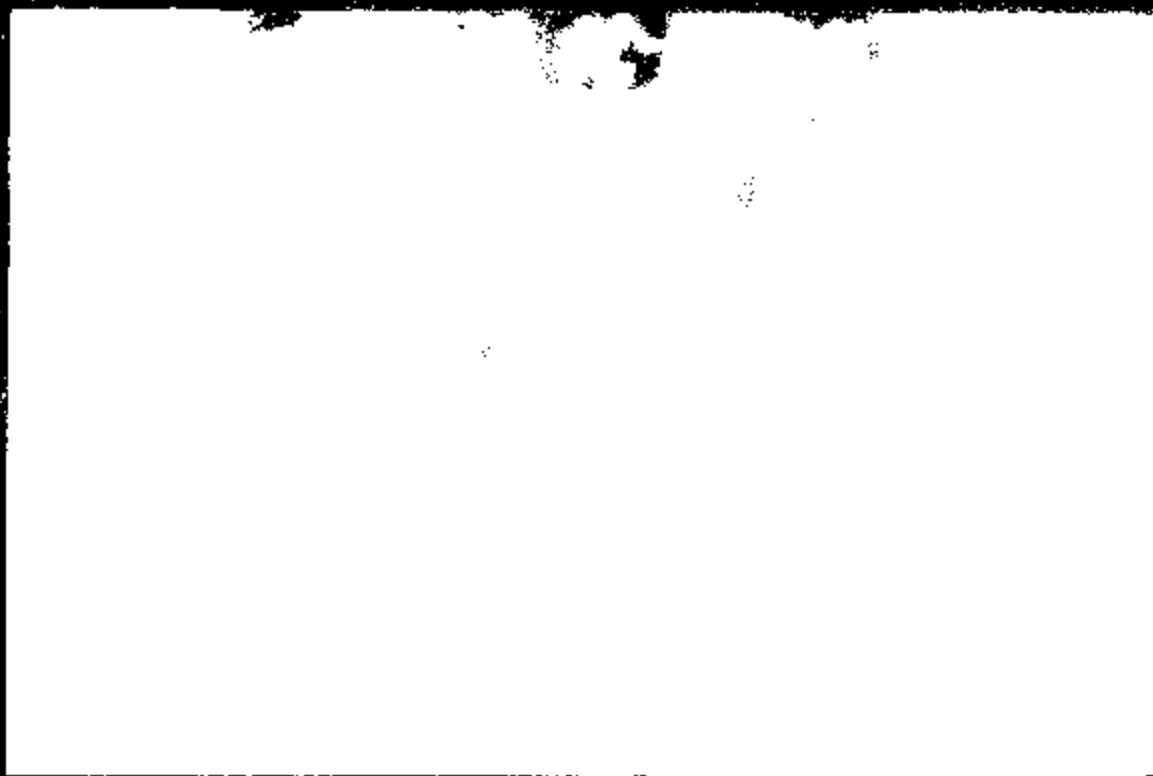
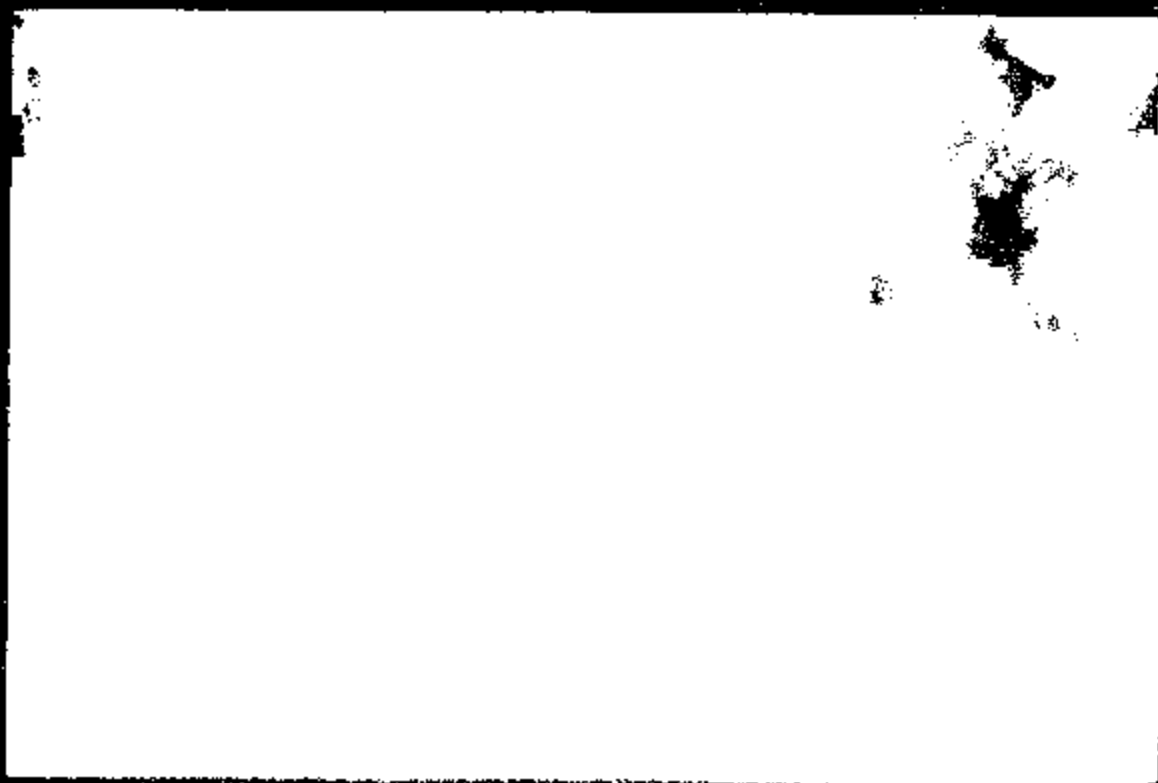


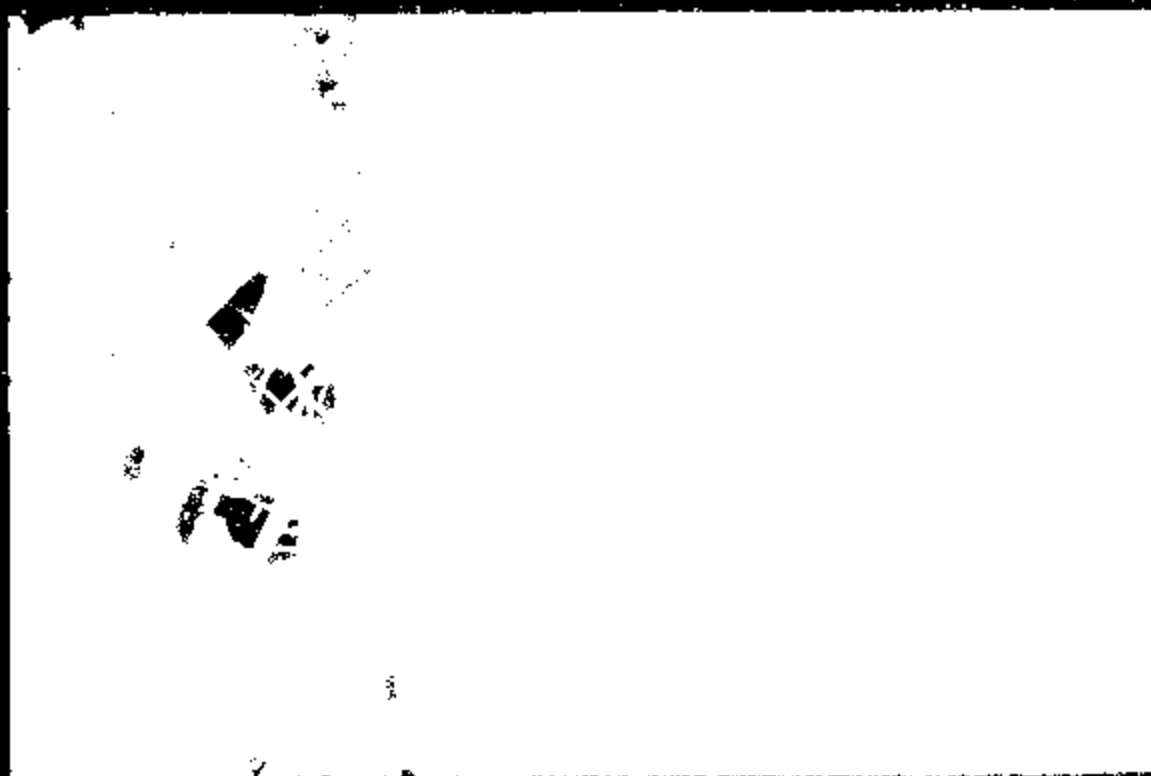
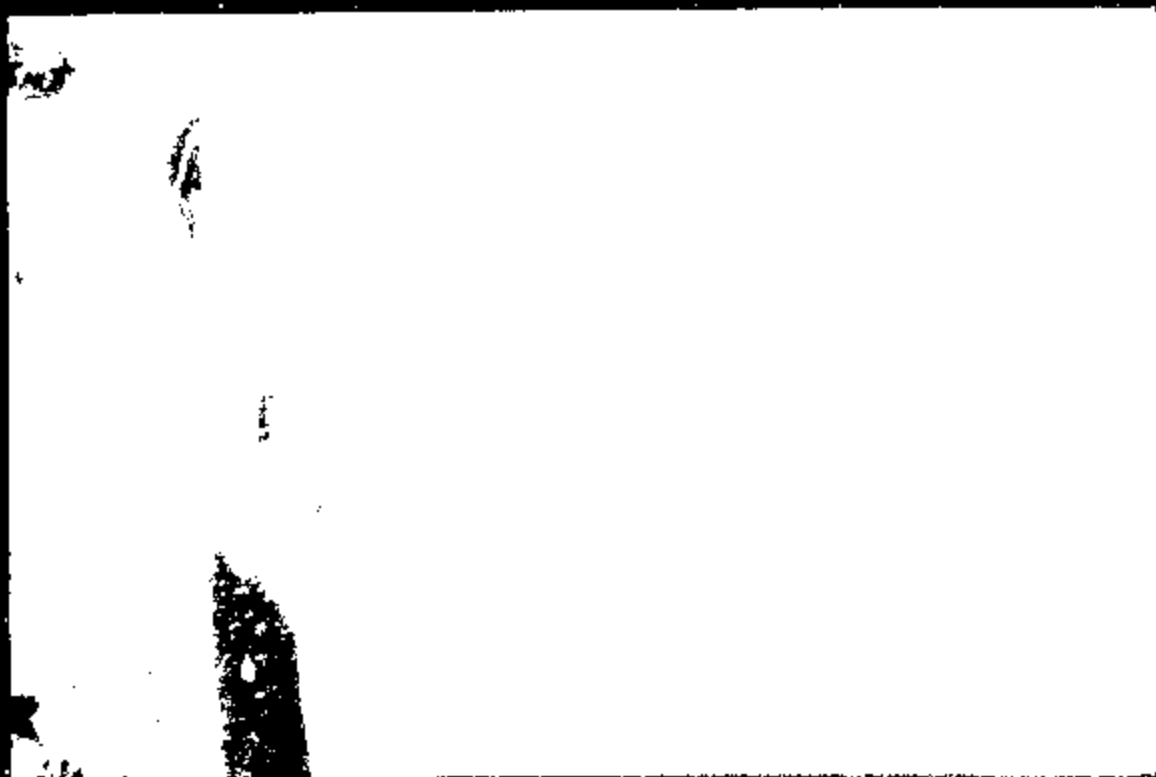
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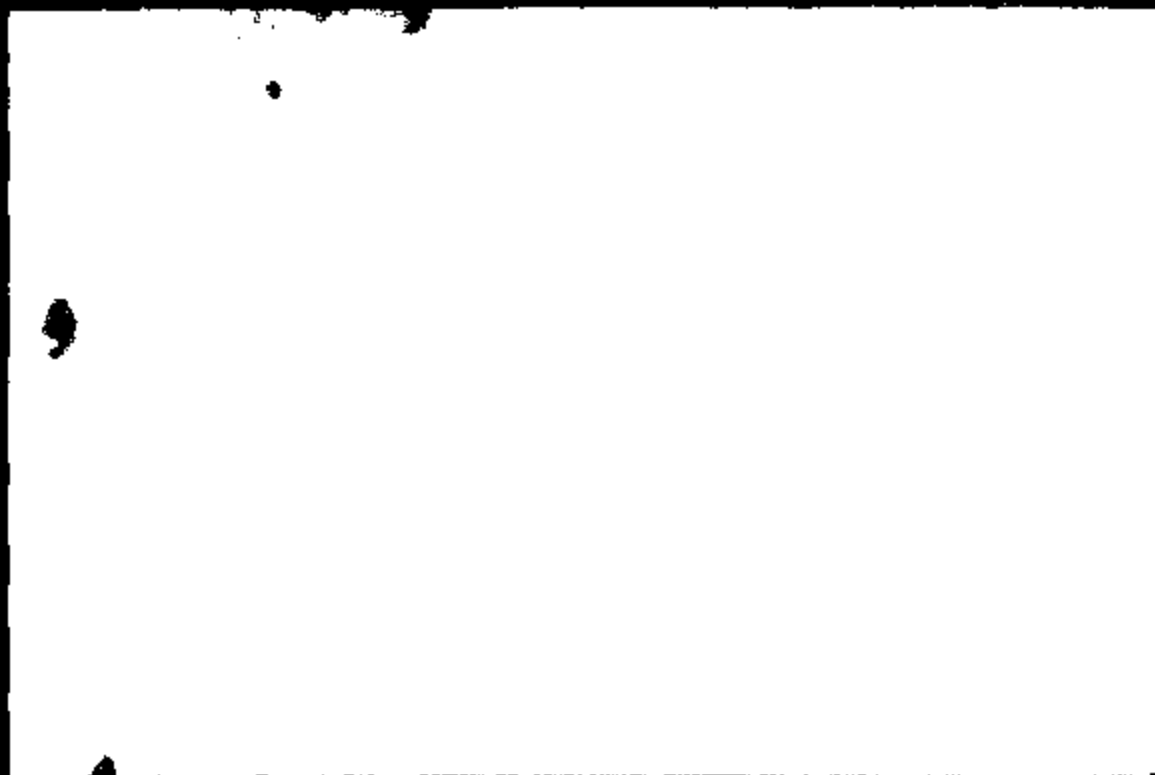


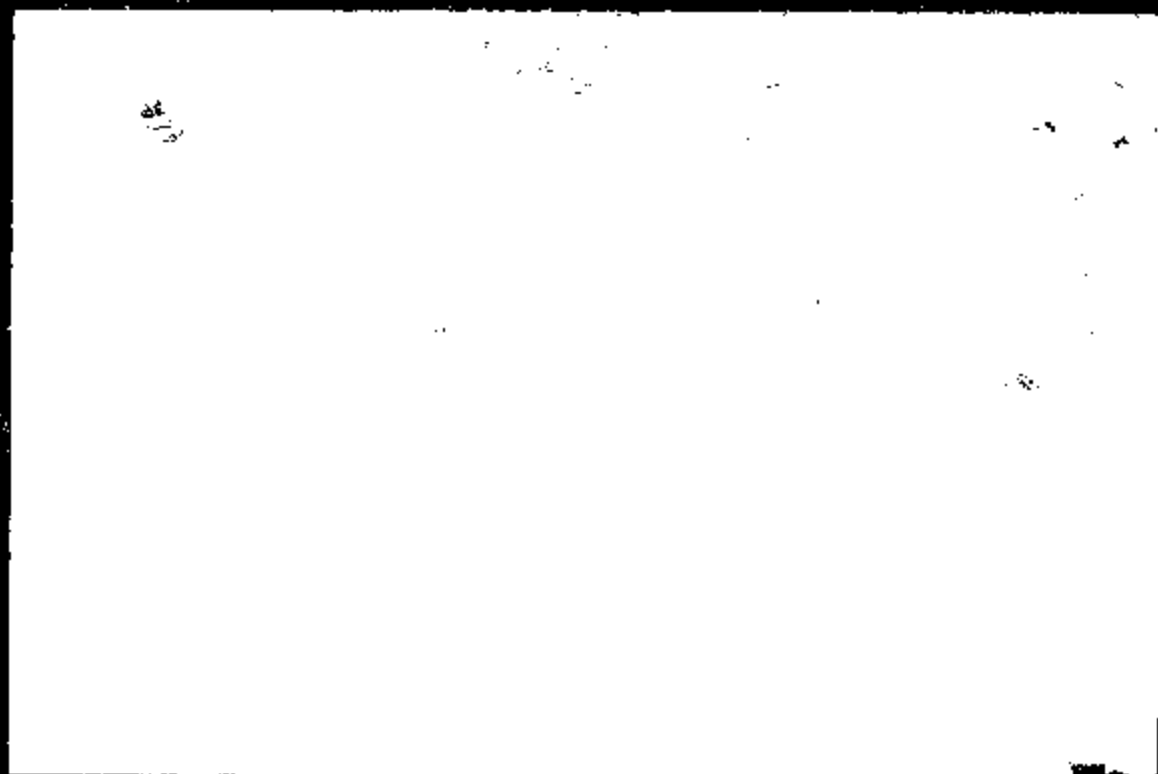


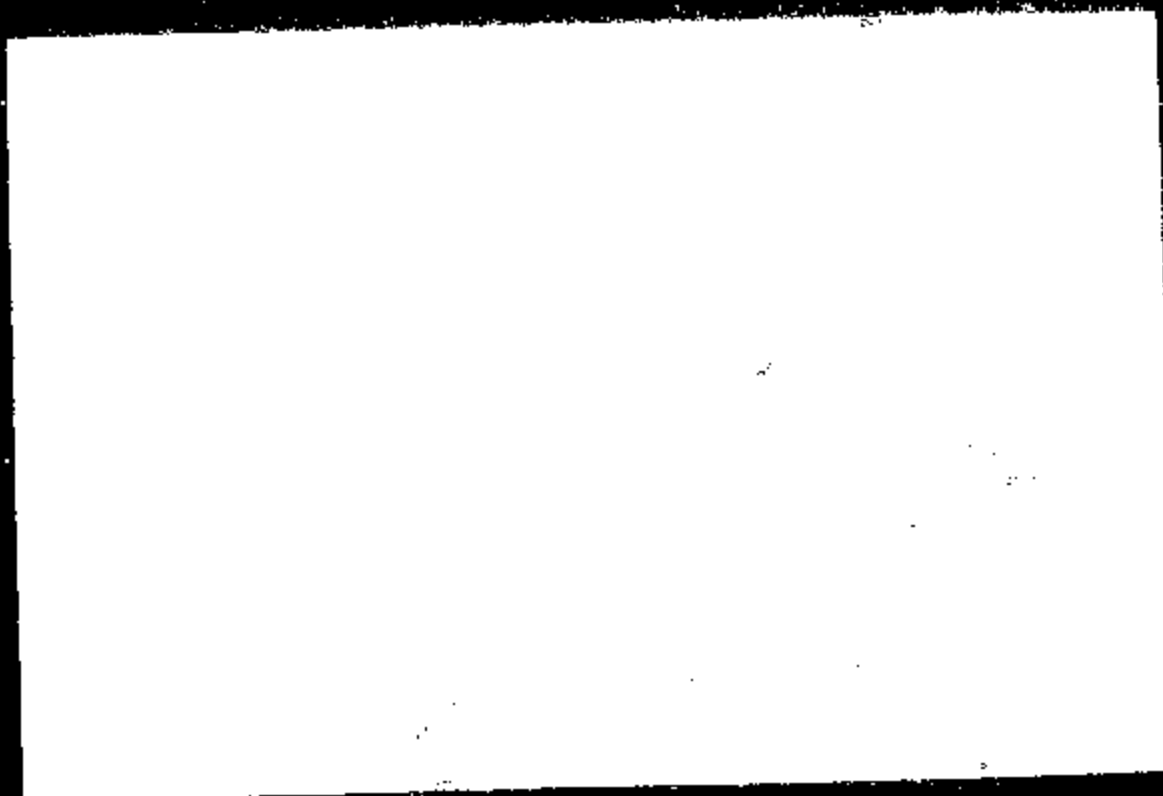
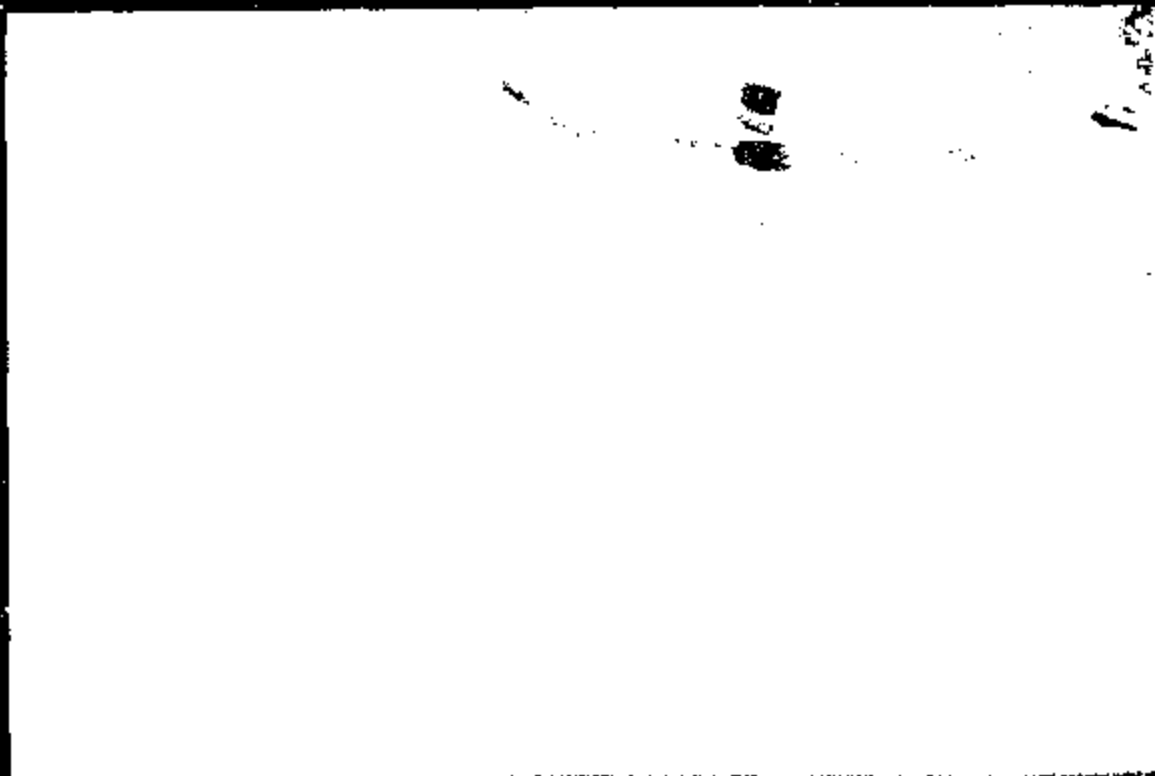


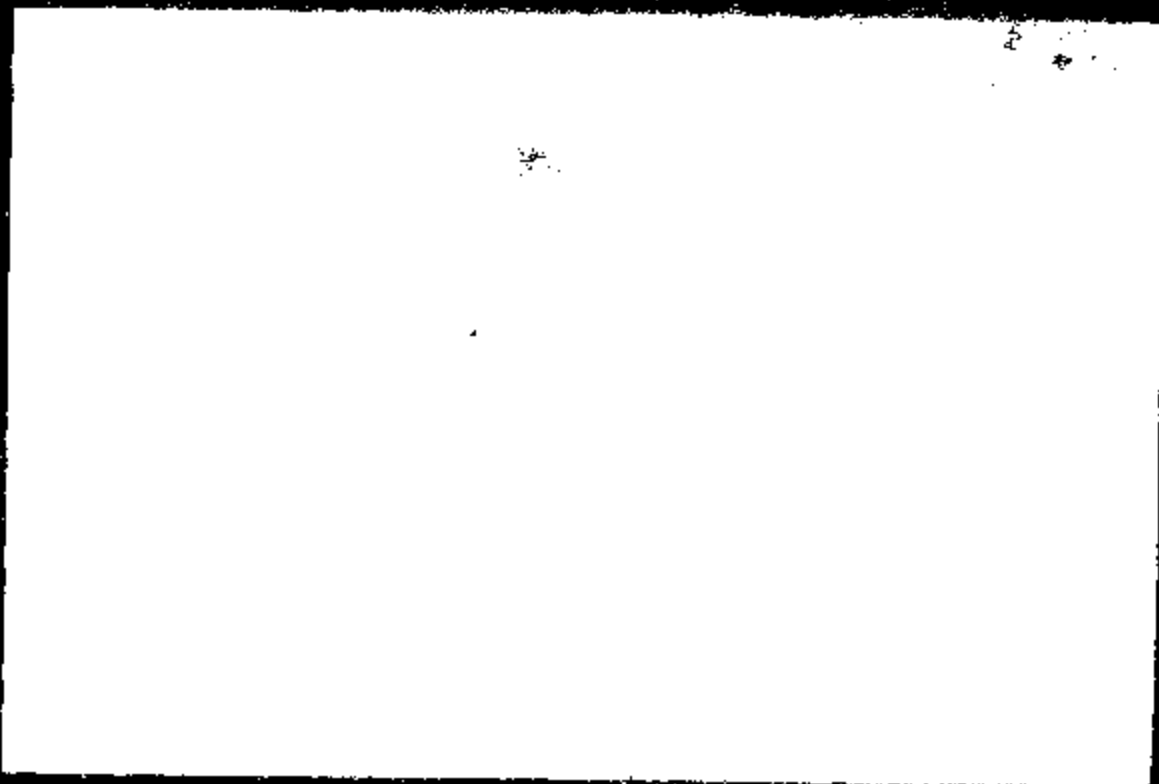
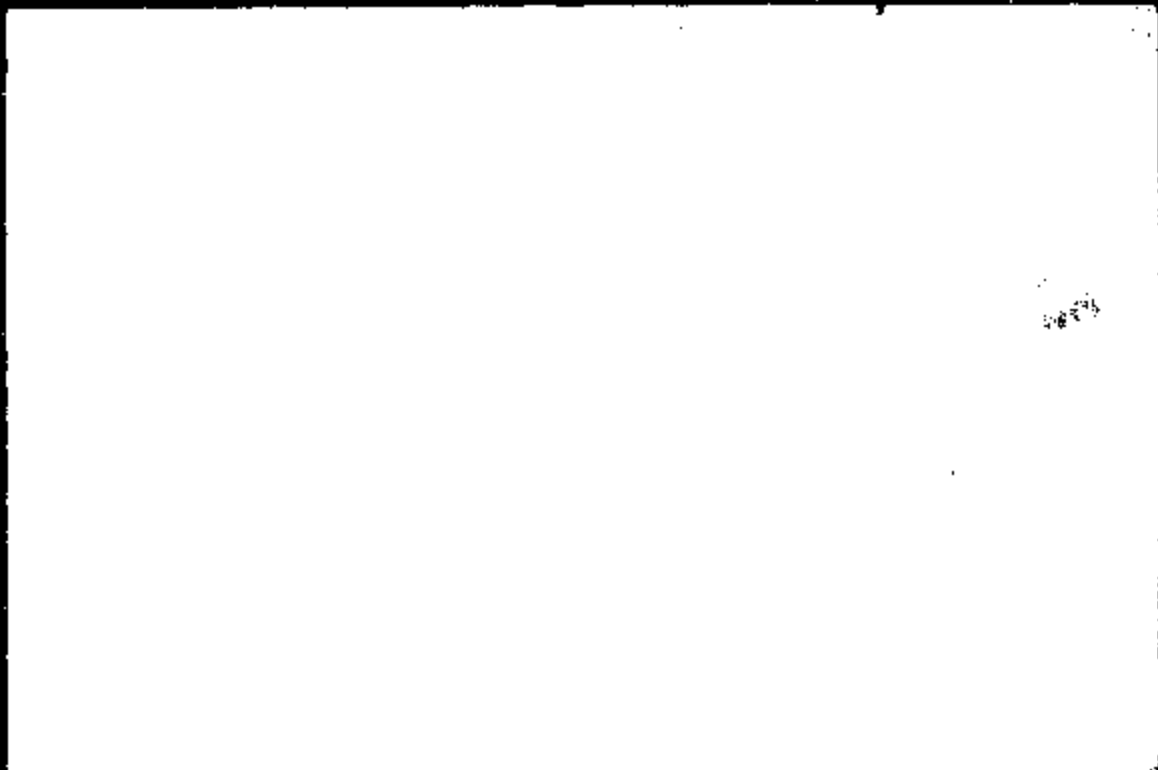


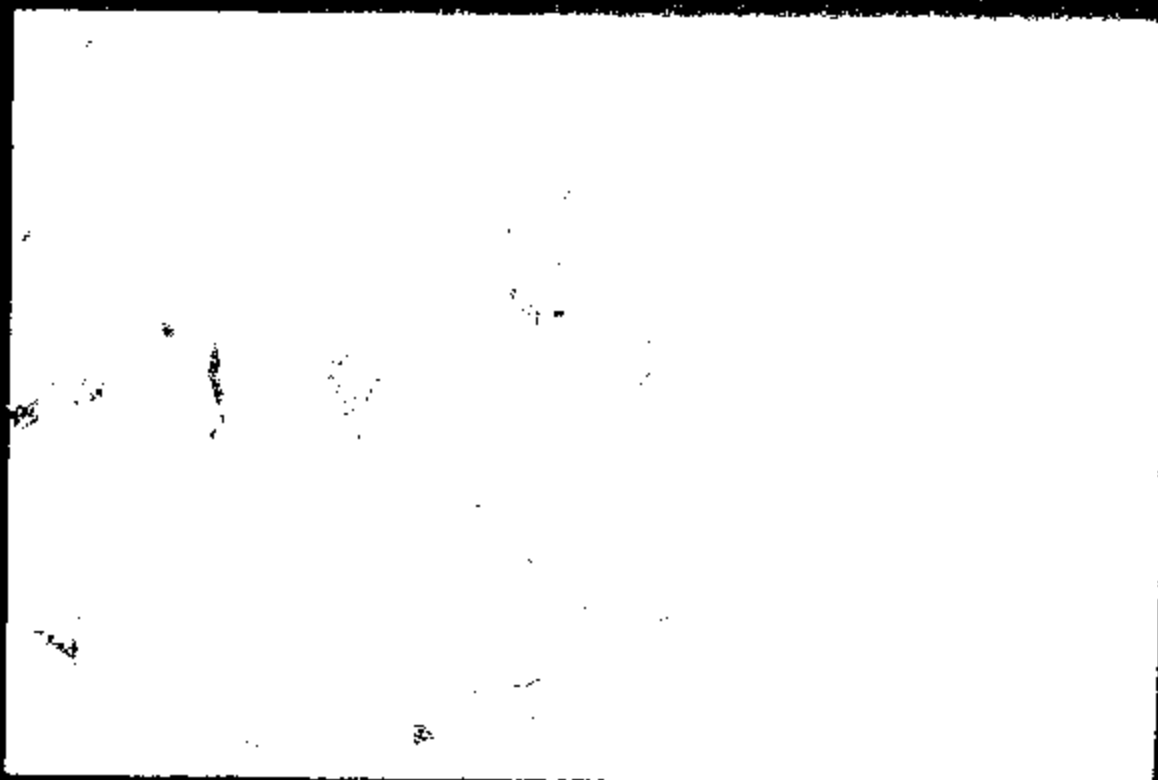
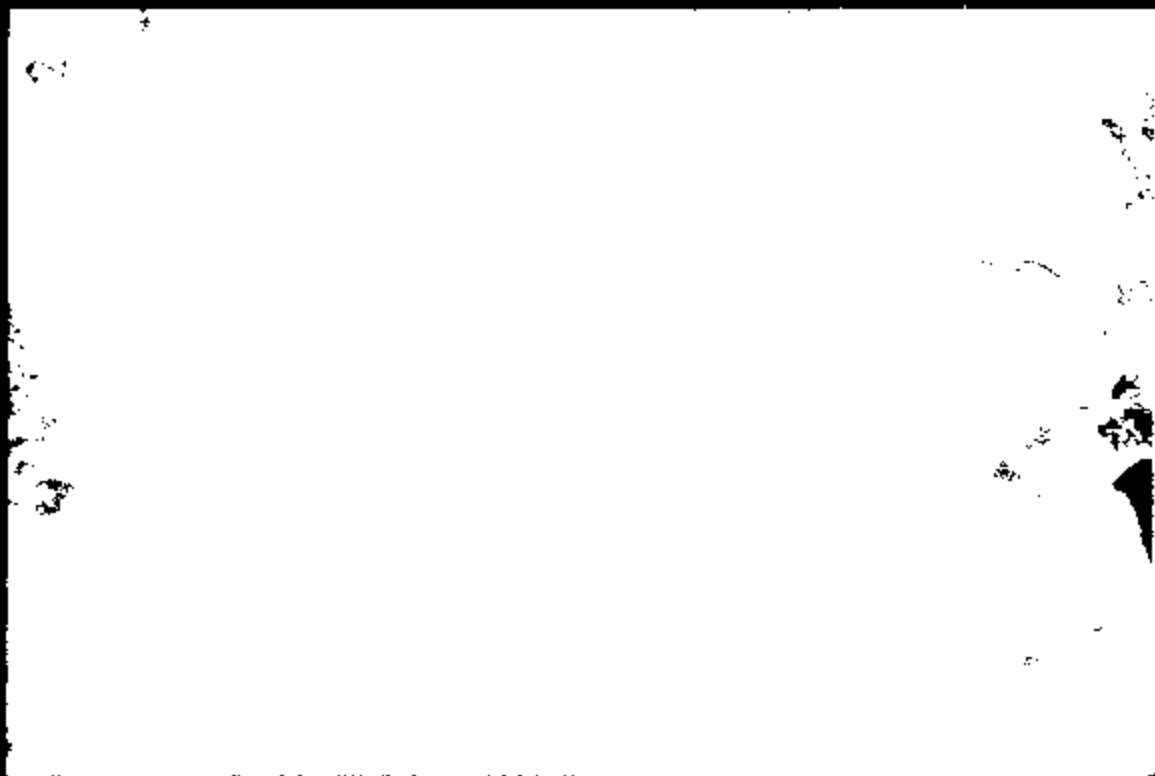


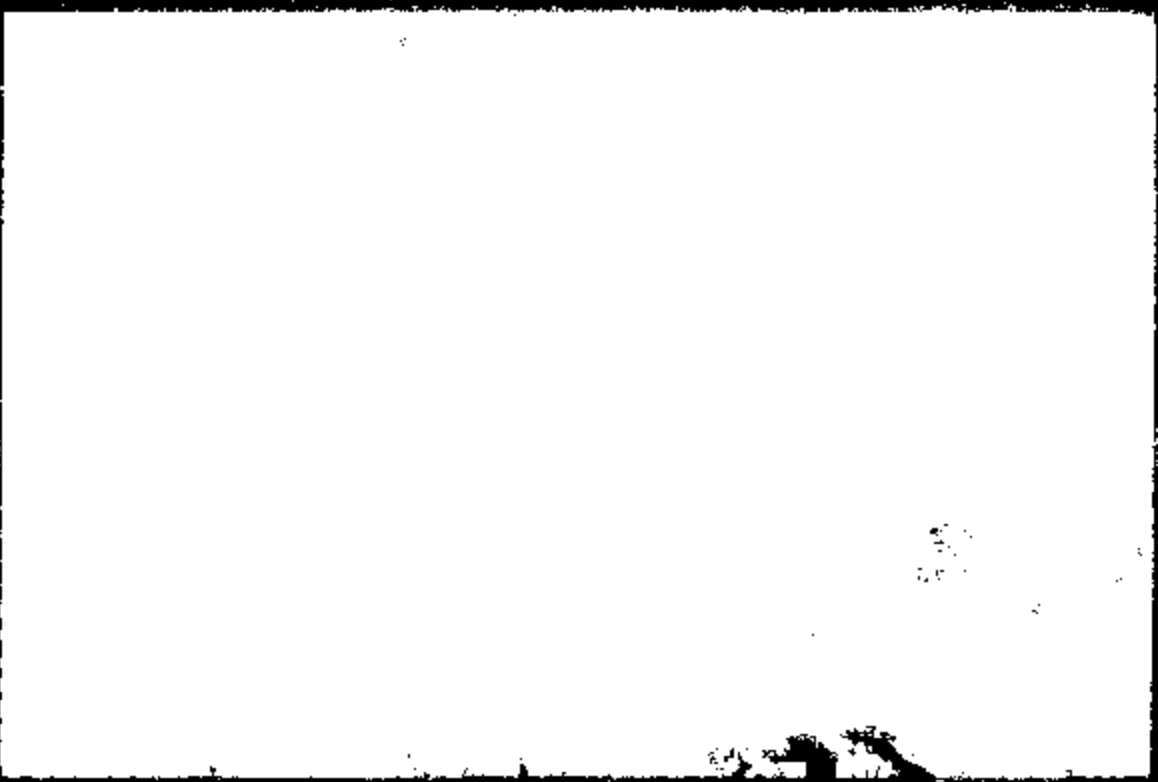
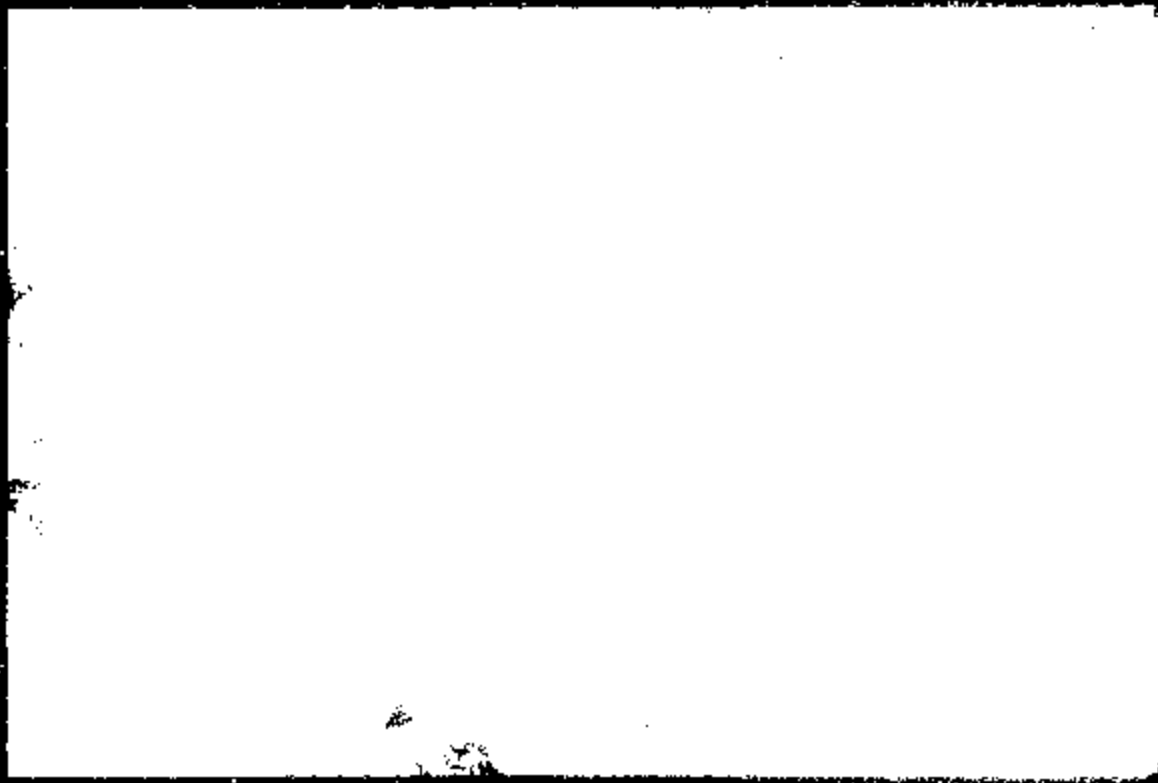


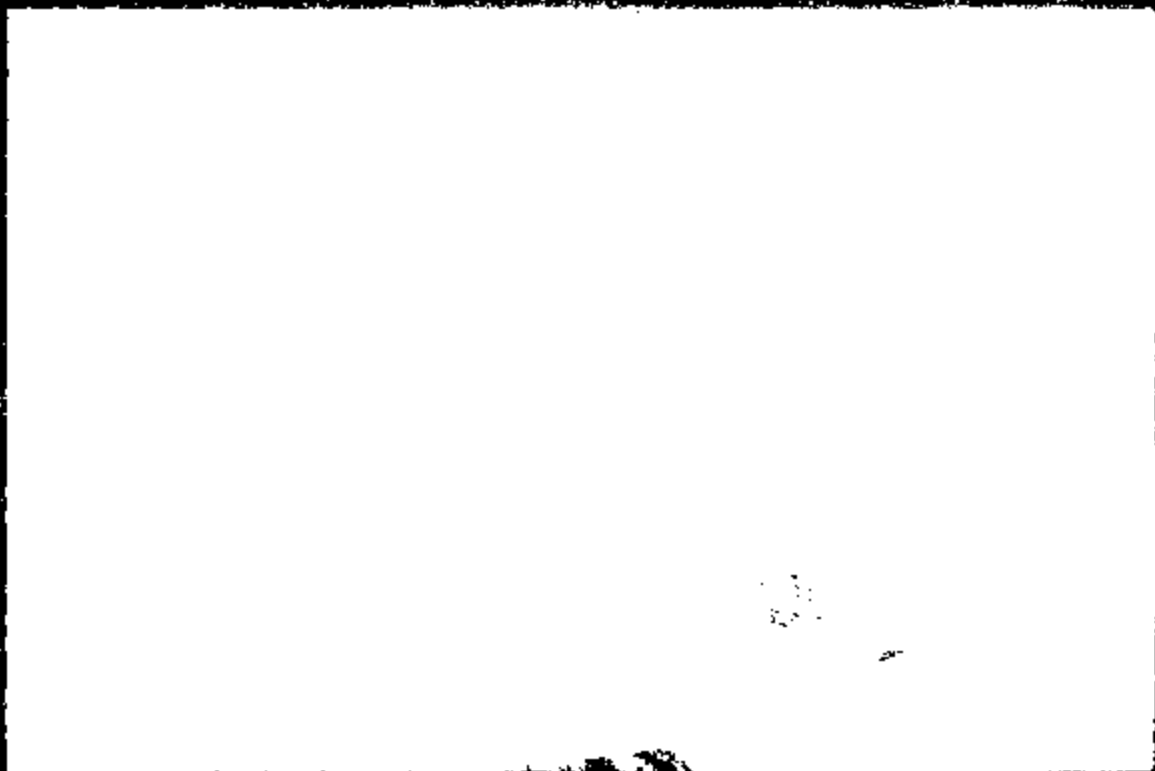
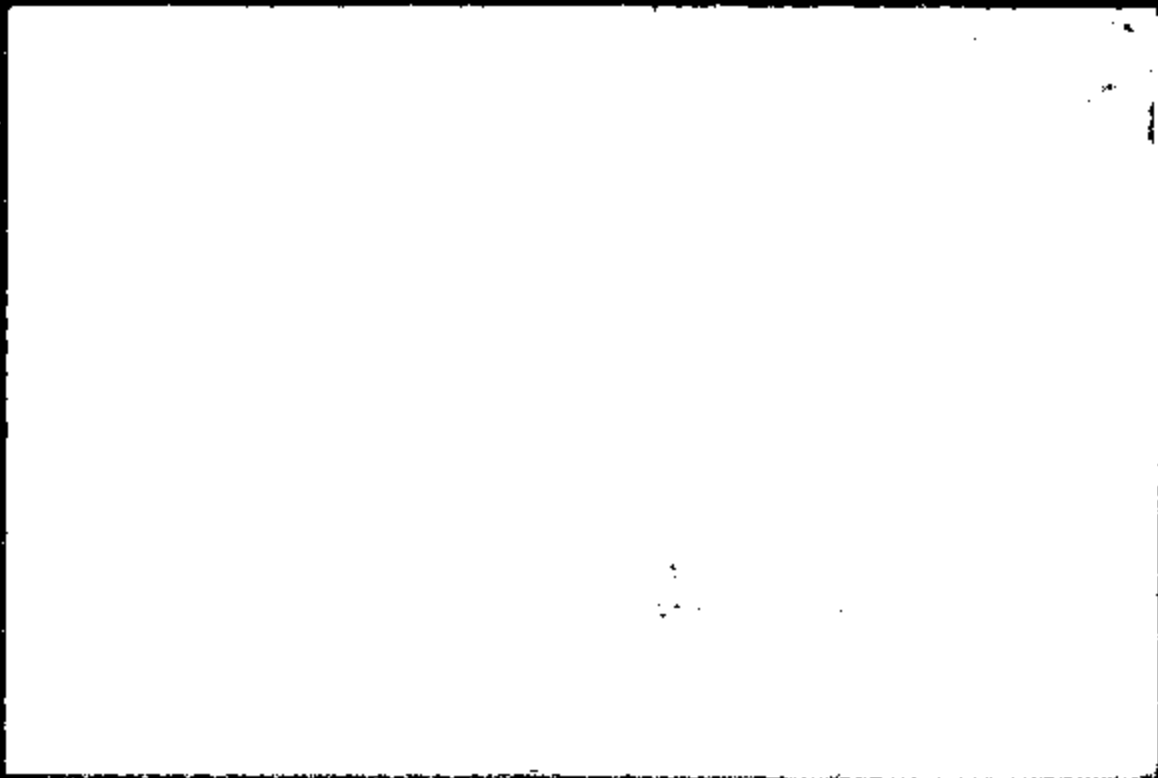


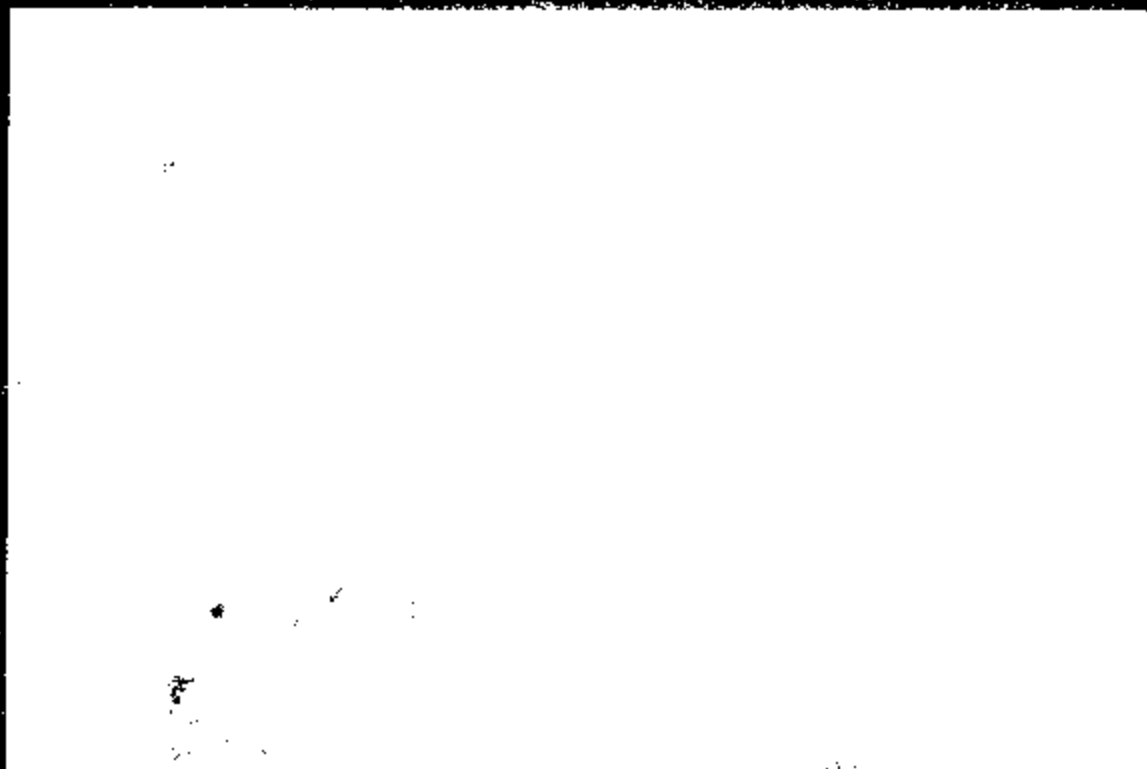
















ENC-020 35524



5902-025 35325





SNORTON1
OH

ED-62-028 28742



UNITED SERVICES AUTOMOBILE ASSOCIATION
9800 Fredericksburg Road, San Antonio, TX 78208

FORD MOTOR COMPANY
PO BOX 6248
DEARBORN MI 48126

June 19, 2003

Policyholder: [REDACTED]
Reference Number: [REDACTED]
Date Of Loss: June 13, 2003
Loss Location: Akron, Ohio

Dear Sirs:

Our Insured sustained a fire loss to his residence as a result of a 1993 Mercury Gran Marquis sedan that caught on fire in the garage. The vehicle was owned by [REDACTED]

Our investigation has revealed a manufacturer defect caused the fire and we are hereby placing you on notice of our insured's damages.

Please contact me at your earliest opportunity so we may make arrangements for you to inspect the vehicle.

If we do not hear from you within 90 days of the date of this letter, we will assume you will not be inspecting the vehicle and will have it destroyed.

This is to notify you of our interest in this matter and to request that you make no settlement with anyone which would prejudice our right of recovery.

The exact amount of our claim, along with supporting documentation, will follow.

If you wish to discuss this matter, please contact me.

Sincerely,

Mary E Cruz

Mary E. Cruz
Senior Property Claims Examiner
Northeast Region
Phone: 1-800-531-8222, EXT. 6-1232
Fax Phone: 1-800-531-0759

3 JUN 25 11:17

CONSUMER AFFAIRS
SECTION

STRUCTURE FIRE
REDACTED

2 MELM75W0
PX 677423

ES62-025 16748

1 6 2 5 0 P

NVMP510

NAVIS Vehicle Inquiry

03/06/03 16:18:22

VEHICLE ID: 1LRY747871 (WWYPSBBB) Vin: 1LNLM82W2RY747871 Div: 3 Status: 800
Vehicle Line: CVB Convy Deliv: 051094 Orig P-Lvl: 410 Selling Dir: 26D137
Order Recpt: 041194 ShipTo Stat: Curr P-Lvl: 410 Sale Date: 052894
Orig Sched: 050294 Rls-To Stat: GA Order Dir/Reg: 26137/26 Demo Dt:
Inv Prep: 042294 Orig Int St: 050394 Orig Rls Dir: 26137 Deliv Type: 0
Prod Date: 050294 Curr Int St: 050394 Rls Dir P&A: 10175 Sales Prd: 094053
Rls Date: 050294 Dirfin Ext: 061094 Warr Start: 052894 Cancel SI:
Memo Consign: PAC Ext: 061094 Warrs-Ind: Sale Status: G
Orig Pltbus: 050294 Advert Ext: 061094 -Date- -Dealer- -Region-
Curr Pltbus: 050294 Slapen SH: 8433 Shipped: 050394
T/Name: Curr Stock: 050294 26D137 26
Addr: State: GA 1st-Prior:
City: MORROW N/A-Rcpt: 053194 2nd-Prior:
Zip: Warr-Ins-Ind: 3rd-Prior:
V.O.: 1 2 3 4 5 6 7 8
123452345678901234567890123456789012345678901234567890123456789012345678901234
M82RY 3 A 2 02E6369 BD D PL 3P 6 L6 S K 26D137 1 GK
5 9 0 1 2 3 4 5 6
5678901234567890123456789012345678901234567890123456789012345678901234567890
DC 8 WILNL2 4 D S 755A 9WP
Fl=Help F3=Exit F4=Primary Menu F5=Financial Screen F9=Screen #3

OGDB432

ER02-025 18741

NWHP520

NAVIS Financial Screen

03/06/03 16:18:35

--> VEHICLE ID: 1LRY747871 (NWYPBSEBBS) Vin: 1LNLM82W2RY747871 Div: 3 Status: 800

Financial Data-

Orig Totl Inv:	33119.30	A-Plan Price:	31653.30	Pradel Invoice:	.00
Curr Totl Inv:	33119.30	Total Adj:	.00	Sched-A GST:	.00
Base Vehicle:	31004.00	Base Adj:	.00	FOC GST:	.00
Options:	731.00	Option Adj:	.00	Price Protect:	.00
Base Holdback:	1082.00	Base Hb Adj:	.00	Chargeback Amt:	.00
Optn Holdback:	25.00	Option Hb Adj:	.00	30-Day FP Amt:	.00
Misc Charges:	.50	Gas Amt:	20.80	Floor Plan:	106.95
Finance Charge:	280.00	Sched-B Amt:	625.00	PAC Charge:	121.68
FDAP/INDA:	458.00	Mktng Contrib:	367.00	Pre-Dlvry Amt:	.00
		X-Plan Price:	.00		

Financing Data-

Finance Source:	0000001	O-Warr Start:	052894	Release Date:	050294
Orig Int St-Sw:	N	Co Tag Number:		Transit Time:	12
Net Draft Ind:		Pre-Gal Date:		Rls Plus Trans:	051494
Floor Plan Date:	061094	Prdlvry S.Code:		Emp Code:	02
Advt Comm Code:	A	Lease Code:		Method Shipped:	7
Upfront BP Ind:		Invoice In-Proc:		Memo Cons Loc:	

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

OGDB432

E982-825 18742

NWMP530

NAVIS Inquiry Screen #3

03/06/03 16:18:38

==> VEHICLE ID: 1LRY747871 (NW19B88888) Vin: 1LMLM82W2RY747871 Div: 3 Status: 800

Ordering Name:
Secondary Name:
Ordering FIN:
Order-For FIN:
Orig Order Type: 2

Selling FIN:
Sold-To Fin:

Distr Status: P
Last NAVIS St: 053194
Distr Stat Dt: 051094
Last Activity: 041896
Serialized Dte: 041294
Scheduled Dte: 050294
Mexico Status:

Component Data

Dr Post/Calib: LLD Tire Brand: A
Exis Cntl Lbl: KBL HEC:
Engine Tag Cd: EG812AA
Engine Serial:
Driver Airbag: FTAB4D18AM3
Passgr Airbag: 1H1015515 Axle: JY

F1=Help F2=Exit F4=Primary Menu F5=Financial Screen F6=Screen #1

OGDB432

E882-828 18743

CSCN140

VEHICLE DATA

03/06/03 16:19:26

--> ENTER VIN ==> 1LNLM82W2RY747871

NAME ==> [REDACTED]

ZIP ==> 30062

MODEL YR ==>

OWNER NAME [REDACTED]

STREET ADDR [REDACTED]

CITY : MARIETTA

N/A YY-MM-DD 97-04-15

ST/PRV: GA CTRY:

ZIP/POSTAL CODE: 30062

N/A SOURCE: M

MODEL YEAR : 94

PLANT: Y

SALE YY-MM-DD 94-05-28

BODY STYLE DESC: 4 DR SEDAN SIGNATURE

PRODUCTION YY-MM-DD 94-05-02

VEHICLE DESC : 1994 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	26	A	137	45	21
FACING	3	26	A	137		
RESPONSIBLE	3	26	A	137		

CA EMISSION :

ENGINE TAG CODE : EG812AA

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 02

DSO DISTRICT :

FLEET CODE :

OPEN : 00 CLOSED : 02

DSO NUMBER :

FLEET STATUS :

ACTIVE: 02 HISTORY: 00

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

OGDB432

8902-025 18744

CSCN150

CAMPAIGN VEHICLE INFORMATION

03/06/03 16:19:29

ENTER CAMPAIGN NUMBER==> 94589 VIN==> 1LNLM82N2RY747871 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: ADAPTER PLT. 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 : AA
MICRO REF: CLAIM NUM: OASIS DATE : 94-08-12
DELETE REASON: VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 1
CURRENT: 3 26 137 ASSIGNED: 97-04-16 SOURCE: PX EXTRACT DATE: 96-12-18
***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC
C COMPLETE 96-08-19 B 96-08-15 10104 015156 CT2ZF6H AC
M RELEASED FOR MAILING 94-12-06
N RELEASED FOR MAILING 94-08-17
R READY TO RELEASE 94-08-11

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)
Z037-NO MORE DATA TO DISPLAY

OCDB432

END-025 16745

CSCN130

NOTIFICATION RECIPIENT HISTORY

03/06/03 16:19:31

==>

ENTER CAMPAIGN NBR ==> 94889 VIN ==> 1LNLM82W2RY747871
DEFECT : ADAPTER PLT. BODY STYLE DESC: 4 DR SEDAN SIGNATURE
RESP DEALER : 338137 BEGINNING MAILED DATE: 94-12-22 YY-MM-DD
RELEASE DESC : POSTCARD FOLLOWUP ENDING MAILED DATE : 94-12-22 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 : ST/PRV: GA
CITY : MORROW / CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N N-A EFF DATE: 94-05-31 YY-MM-DD

RESP DEALER : 338137 BEGINNING MAILED DATE: 94-09-09 YY-MM-DD
RELEASE DESC : NEW ISSUE TOTAL ENDING MAILED DATE : 94-09-09 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 : ST/PRV: GA
CITY : MORROW CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N N-A EFF DATE: 94-05-31 YY-MM-DD
F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140
Y048-LAST PAGE OGDB432

2002-025 18748

CSCN150

CAMPAIGN VEHICLE INFORMATION

03/06/03 16:19:34

==>

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 1LNLM82W2RY747871 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: PASS AIR BAG BODY STYLE: 4 DR SEDAN SIGNATURE
NEW STATUS CODE:
REPAIR INFORMATION: TYPE CODE: CAMP DIV : 6
REPAIR DATE: DEALER P/A: SUPP CODE :
MICRO REF: CLAIM NUM: KIT CODE : CJ
OASIS DATE :
DELETE REASON: VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 1
CURRENT: 3 26 137 ASSIGNED: 97-04-16 SOURCE: PX EXTRACT DATE: 96-12-18
***** 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 97-02-17
H AWAITING MAILING 96-11-24

DELETE REASON:

F1-INQUIRY F2-G140 F3=EXIT F5=G130 F7-FIRST F8-NEXT F9-MORE STATUS
F10=ADD STATUS F11=REVISE (ALL DATA FIELD DATES YY-MM-DD)
I037-NO MORE DATA TO DISPLAY

OGDB432

ER92-025 18747

■ ■ ■

NOTIFICATION RECIPIENT HISTORY

03/06/03 16:19:38

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ENTER CAMPAIGN NBR ==> 96L12 VIN ==> 1LNLM82W2RY747871
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DR SEDAN SIGNATURE
RESP DEALER : 326137 BEGINNING MAILED DATE: 97-03-08 YY-MM-DD
RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-03-20 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS: FF
STREET ADDR1 :
ADDR2 :
CITY : MARIETTA CTRY:
ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 96-03-16 YY-MM-DD
*****
RESP DEALER : BEGINNING MAILED DATE: YY-MM-DD
RELEASE DESC : ENDING MAILED DATE : YY-MM-DD
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 :
CITY : 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
1048-LAST PAGE OGD8432

```

ENCLOSURE 18748

CSCN150

CAMPAIGN VEHICLE INFORMATION

03/06/03 16:19:41

==>

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 1LXLM82W2RY747871 TYPE OF SEARCH: A
MODEL YEAR: DEFECT: PASS AIR BAG BODY STYLE:

NEW STATUS CODE:

REPAIR INFORMATION:

REPAIR DATE:

TYPE CODE:

DEALER P/A:

MICRO REF:

CLAIM NUM:

DELETE REASON:

RESP DEALER INFORMATION:

NEW:

CURRENT:

ASSIGNED:

SOURCE:

CAMP DIV :

SUPP CODE :

KIT CODE :

OASIS DATE :

VENDOR N/A INFORMATION:

IND: MATCH CODE:

EXTRACT DATE:

***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC

DELETE REASON:

F1-INQUIRY F2-Q140 F3-EXIT F5-Q130 F7-FIRST F8-NEXT F9-MORE STATUS

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

2667-END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES

OGDB432

EP02-025 15749

ANALYTICAL WARRANTY SYSTEM**Vehicle Information Report****GENERAL VEHICLE
INFORMATION:****(Related Claims)**

VIN	1LNLM2W2KY74771	Vehicle	CVE - TOWN CAR (FORD VIN 1991-97)	Body Style	
Model Year	1994	Market Division	CM - LAM DIVISION DERIVATIVE	Motor Eng Serial No	
Vehicle Type	C	Drive Code	CH - 2 WHE, 1.8L SEAR DRIVE	Engine	CVM - 2.8L 4.0L 5.0L 5.4L NA CIVE GMP
Inv. Dealer	10175	Body Cab Style	- 4 DOOR SEDAN-GLITE	Transmission	CDE - 4 SPD AUTO TRANS NAAG ACCH
Vehicle Status Code	000	Version/Option	CHE - SIGNATURE VERSION		

Trans Eng Serial No

NA

Trans Trans Serial No

NA

BUILD INFORMATION:

Region	NA - NORTHAMERICA	Plant	BA - WILM PLANT BUILD
Country	USA - NORTHAMERICA	Prod Date	01-MAY-1994

SALE INFORMATION:

Region	NA - NORTHAMERICA	Selling Dealer	226177-0
Country	USA - NORTHAMERICA	Selling Div-Rep/Prov	GA
		Buyer Ref/Prov	GA

800-422-1875

Arrival Date: 10-MAY-1994 Red Carpet Lease
 Sale Date: 20-MAY-1994 Fleet/Lease/Co. Lease R
 Warranty Start Date: 20-MAY-1994 Modified Vehicle * Vehicle Count Flag
 Orig Warranty Date: 20-MAY-1994 Recaptured Vehicle * Vehicle Report Page N

VOC/EOC:

 00000765071 2 A 2 00000000 NO D MAY 30 6 AM 8 X 000007 1 OR DC 0 00
 0000 0 0 0 7550 000 X

INSTALLED OPTION INFORMATION:

Air Conditioning:	CC - A/C AIR CONDITIONER	GVW Code:	
Alternator Amp Rating:	*	GVW Class Code:	L
Anti Lock:	*-[N/A]	Instrumentation:	*-[N/A]
Asb Ratio:	REACC - 1.00 FINAL DRIVE RATIO	Mirror(Driver Side):	*-[N/A]
Asb Type:	REHAB - NON-LIMITED SLIP REAR AXLE	Mirror(Passg Side):	*-[N/A]
Battery Amp Rating:	TZ	Paint:	PERCA - MED NIGHT MET
Brake Code:	*-[N/A]	Power Antenna:	*-[N/A]
Brake Code(Servobr):	*-[N/A]	Rear:	AQ - ELITE PREMIUM 140PM STEELSTE
Calibration Code:	4TUNP0A	Sound System:	*-[N/A]
Color(Accent):	*-[N/A]	Single Tapless Axle:	
Color(Trip):	0000C-	Tire Manufacturer:	AJ-
Delivery Type:	0	Tire Brand:	*
Differential Code:	*	Tire Size:	D000F - P215/70R15 WSW
Front Seat:	*-[N/A]	Traction Control:	*-[N/A]
Fuel Type:	*-[N/A]	Wheel Span:	

TIRE DOT INFORMATION:

LP: * RP: *
 LR: * RR: *
 LL: * RL: *
 STARS: * DOT First Manufacturer: **

0000-0000 10751

ESP INFORMATION: EMISSIONS INFORMATION:

ESP Code:	L	Emission Code:	CS - CS
ESP Coverage(Miles):	050	Emission Cert Type:	F
ESP Coverage(Years):	042	Emission Test Station:	KM
ESP Plan Year:	1994	Engine Family:	EFM46VEGARA
ESP Signature Date:	28-MAY-1994		

Any comments?

ENC-025 18762

ANALYTICAL WARRANTY SYSTEM**Vehicle Information Report****GENERAL VEHICLE
INFORMATION:****(Related Claims)**

VIN	1J4NLS32W7K747871	Vehicle Line	CVB - TOWN CAR (FORDEN16) [51-97]	Body Style	*
Model Year	1994	Market Description	CM - L-MIDWESTERN DERIVATIVE	Vehicle Reg Serial No.	*
Vehicle Type	C	Body Code	CB - 2 WH LXR DR	Engine	CVN - 3.0 L 4 CYL SCHE BY NA CIVI 0-100
Inv. Dealers	16175	Body Chassis	- 4 DOOR SEDAN 5 LITE	Transmission	CDK - 4 SPD AUTO TRANS NAAD AODE
Vehicle Status Code	ND	Version/Market	CVR - SIGNATURE VERSION		

Trace Reg Serial No:

-----1-----2-----3-----4-----5-----6-----7-----8-----9-----10-----11-----12-----

XX

Trace Trans Serial No:

XX

BUILD INFORMATION:

Region	NA - 480000000	Plant	NA - WILSON PLANT BULD
Country	USA - 480000000	Prod Date	02-MAY-1994

SALE INFORMATION:

Region	NA - 480000000	Selling Dealer	326131 - *
Country	USA - 480000000	Selling Div	SA/Prod GA
		Super SA/Prod	GA

E902-023 15793

Arrival Date:	10-MAY-1994	Mail Carport Location:	*
Sale Date:	22-MAY-1994	FirstNationalCo. Location:	R
Warranty Start Date:	22-MAY-1994	Mail/Hand Vehicle:	* Vehicle Count Flag
Orla Warranty Date:	22-MAY-1994	Excess/Hand Vehicle:	* Vehicle Export Flag: N

VOCTOC:

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

HUSKTT47571 3 A 2 0254000 TD 9 PNY SP 0 LA S K DEXLST 1 GK DC 0 W

UNCL & D E TUSA 000 A

INSTALLED OPTION INFORMATION:

Air Conditioning	OC - A/C AIR CONDITIONER	GVW Code	
Alternator Amp Rating *		GVW Class Code	L
Anti Lock	* - [N/A]	Instrumentation	* - [N/A]
Auto Radio	EGACC - 3.08 FINAL DRIVE RATIO	Mirror(Driver Side)	* - [N/A]
Axis Type	BQIAB - NON-LIMITED SLP REAR AXLE	Mirror(Passg Side)	* - [N/A]
Battery Amp Rating	72	Paint	PRCA - RED MIGHT MIST
Brake Code	* - [N/A]	Power Windows	* - [N/A]
Brake Code(Service)	* - [N/A]	Radio	AQ - ELITE PREMIUM AM/FM STEREO
Calibration Code	416JRDAA	Sound System	* - [N/A]
Color(Accent)	* - [N/A]	Suspension Axle	
Color(Trim)	00EC -	Tire Manufacturer	AJ -
Delivery Type	0	Tire Brand	*
Driveshaft Code	*	Tire Size	D60P - P215/70R15 WSW
Front Seat	* - [N/A]	Transmission Control	* - [N/A]
Fuel Type	* - [N/A]	Wheel Base	

TIRE DOT INFORMATION:

LF: * RF: *
LB: * RB: *
LI: * RI: *
STATE: * DOT: * M: * C: *

ESP INFORMATION: EMISSIONS INFORMATION:

ESP Code:	L	Emission Code:	CB-CB
ESP Coverage(Miles):	650	Emission Cert Type:	F
ESP Coverage(Ther):	042	Emission Brand Suffix:	KEL
ESP Mile Year:	1994	Engine Family:	KFM5VQJARA
ESP Signature Date:	24-MAY-1994		

Any comments?

ESP-023 18793

Standard Claims List For Model Year 1994

Note: All Costs are in US Dollars

VIN	VEH LINE	MOY DIRTY	BODY CAB	VIR N R S	DRIVE TYPE	FLT CD	TRN CD	ENG CD	PRCD DATE	WARR DATE	SELLING DEALER	SELL CNT	TR	WCC CMC_6	PRMF	RANK	SUFF	COC CD	CD	TEST (d/m/y)
1LNLM03W2RY747971	CVB	CM	CPC	CHE	CR	BA	CHE	CVN	82- MAY-1994	28-MAY-1994	326137	USA	0	SEN 000502	FLAZ	2A35	A	A99	01	3
AWS Chain Keys:		181024	Trx Code:	1	Labour Elm:	27	Labour Cost:	131.42	Material Cost:	127.11	Total Cost:	258.53								
Dir Ch-Sub Cb:		10175-0	Name:	SPARTAN LINCOLN-MERCUARY, INC.				Ph:	770-5681245	St GA	City Cb:	USA	Reg Cb:	NA	Reg Date:	11-MAY-1994	Doc:	87522181		
Chet Comments:		1 IN R 104K P 242																		
Tech Comments:		RIPPA 120 DRAG 144 THY 450000 4515																		
A M-Sub-Sub Cb:		10175-0	Trx Code:	1	Labour Elm:	3	Labour Cost:	60.03	Material Cost:	1.29	Total Cost:	11.32								
Dir Ch-Sub Cb:		10175-0	Name:	SPARTAN LINCOLN-MERCUARY, INC.				Ph:	770-5681245	St GA	City Cb:	USA	Reg Cb:	NA	Reg Date:	14-JUN-1994	Doc:	8765741		
Chet Comments:		B43 INSIDE TRIM PANEL LEFT SIDE AT BACK GLASS HAS COME A LOOSE																		
Tech Comments:		REPLACED PARTS AND CCS																		
1LNLM03W2RY747971	CVB	CM	CPC	CHE	CR	BA	CHE	CVN	82- MAY-1994	28-MAY-1994	326137	USA	28	.	.	.	.	.	.	45152
AWS Chain Keys:		181024	Trx Code:	1	Labour Elm:	14	Labour Cost:	41.2	Material Cost:	2.2	Total Cost:	43.4								
Dir Ch-Sub Cb:		10175-0	Name:	FRANK JACKSON & CO				Ph:	770-5681245	St GA	City Cb:	USA	Reg Cb:	NA	Reg Date:	14-JUN-1994	Doc:	8805156A		
Chet Comments:		SHOW BILT AT LASALLE IN RARIUM KINGSTON 11-11-94																		
Tech Comments:		100% COMP WARRANTY 100% DRUG CALL 770-5681245 100% DRUG CALL 770-5681245 100% DRUG CALL 770-5681245																		

Any comments?

6902-029 15726

ANALYTICAL WARRANTY SYSTEM**Claim Detail Report**

Note: All Costs are in US Dollars

Model Year = 1994; Claim Key = 1814924

Vehicle Information

Model Year: 1994

Market Derived: C/M - L-M DIVISION DERIVATIVE

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

Version/Series: C/BR-SIGNATURE VERSION

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

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

Warranty Start Date: 28-MAY-1994

Production Date: 02-MAY-1994

VIN: 1LNLM82W2RY747871

Claim Information

Document Number: 752181

Repair Date: 11-MAY-1994

Distance: 3

TIS: 0

Dealer Information

Dealer Name SPARTAN LINCOLN-MERCURY, INC.

Dealer Code: 10175 - *

Address: 1425 SOUTHLAKE PARKWAY

City: MORROW

State: GA Zip Code: 30260

Country: USA Region Code: NA

Phone: (770)124-1245

Expense Information

Customer Paid Amount: 0

Deductible Amount: 0

Dealer Paid Amount: 0

Labor Cost: 131.42

Misc. Expense Amount: 0

Part Markup Amount:

Material Cost: 127.11

Total Cost Gross: 258.53

1814924-025 18787

ANALYTICAL WARRANTY SYSTEM**Claim Detail Report**

Note: All Costs are in US Dollars

Model Year = 1994; Claim Key = 4171608

Vehicle Information

Model Year: 1994

Market Derived: C/M - L-M DIVISION DERIVATIVE

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

Version/Series: C/BR-SIGNATURE VERSION

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

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

Warranty Start Date: 28-MAY-1994

Production Date: 02-MAY-1994

VIN: 1LNLM82W2RY747871

Claim Information

Document Number: 765741

Repair Date: 14-JUN-1994

Distance: 1424

TIS: 1

Dealer Information

Dealer Name SPARTAN LINCOLN-MERCURY, INC.

Dealer Code: 10175 - *

Address: 1425 SOUTHLAKE PARKWAY

City: MORROW

State: GA Zip Code: 30260

Country: USA Region Code: NA

Phone: (770)124-1245

Expense Information

Customer Paid Amount: 0

Deductible Amount: 0

Dealer Paid Amount: 0

Labor Cost: 10.03

Misc. Expense Amount: 0

Part Markup Amount:

Material Cost: 1.89

Total Cost Gross: 11.92

ENR2-428-15750

Cust. Concern Code: T90 - OTHER INTERIOR TRIM TROUBLES

Condition Code: 39 - MISSING PART

Technician Comment: REPLACED FASTENERS CC59

Customer Comment: B43 INSIDE TRIM PANEL LEFT SIDE AT BACK GLASS HAS COME A LOOSE

Labor Op Code	Labor Op Description	Labor Op Cost
999A	ADDITIONAL MISC. REPAIRS	0

Causal	Full Part Number	Part	Part	Extended			
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity	Amount
Y	*	52018	*	CVR RF SIDE REAR	NANANA	0	0
N	*	N807247	S		NANANA	5	0

Any comments?

800-823-1676

ANALYTICAL WARRANTY SYSTEM**Claim Detail Report**

Note: All Costs are in US Dollars

Model Year = 1994; Claim Key = 15907291

Vehicle Information

Model Year: 1994

Market Derived: C/M - L-M DIVISION DERIVATIVE

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

Version/Series: C/BR-SIGNATURE VERSION

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

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

Warranty Start Date: 28-MAY-1994

Production Date: 02-MAY-1994

VIN: 1LNLM82W2RY747871

Claim Information

Document Number: 015156A

Repair Date: 15-AUG-1996

Distance: 45858

TIS: 28

Dealer Information

Dealer Name FRANK JACKSON L/M

Dealer Code: 10104 - *

Address: 7555 ROSWELL ROAD

City: ATLANTA

State: GA Zip Code: 30350

Country: USA Region Code: NA

Phone: (*)-*

Expense Information

Customer Paid Amount: 0

Deductible Amount: 0

Dealer Paid Amount: 0

Labor Cost: 81.2

Misc. Expense Amount: 5.8

Part Markup Amount:

Material Cost: 1.2

Total Cost Gross: 88.68

00002-020 15791

Cust. Concern Code: * -

Condition Code: * - [N/A]

Technician Comment: 45858 94S89 WARR COMPLETED RECALL 94S89 BACKING PLATE BOLT REPLACEMENT RECALL

Customer Comment: 94S89 REPLACE FASTENERS REAR BACKING PLATE (LETTER

Labor Op Code Labor Op Description Labor Op Cost

94S89B REPLACE 81.2

Causal	Full Part Number	Part	Part	Extended
Flag	PREF BASE SUFF	Description	CPSC	Quantity Amount
N	ESTZ 2248 AR	BOLT RR BRK BACK PLA	NANANA	1 1.2

Any comments?

ENR-028 15762

OASIS RESULT:
1LNLM82W2RY74787103/04/2003
10:31:00

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VEHICLE INFORMATIONVEHICLE DESCRIPTION
1994 TOWN CARBODY STYLE
4 DR SEDAN SIGNATUREENGINE
4.6L SOHC
(ROMEO)ENGINE
CALIBRATION
418JRD0ATRANSMISSION
4 SPD OD ACDEAXLE CODE
JY**GENERAL WARRANTY INFORMATION**WARRANTY START DATE
05/28/1994BUILD DATE
05/02/1994

SALE MILEAGE

WARNING MESSAGES

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

FIELD SERVICE ACTIONS

NO CAMPAIGN MESSAGE(S) FOUND

EXTENDED COVERAGES

0767 - EXPIRED

STANDARD DEDUCTIBLE: 0 USD

OWNER NAME

OPTIONS:

EXPIRATION DATE: 05/28/1998

DISTANCE: 50,000

RENTAL: 30 UP TO 2 DAYS

TOWING: 0 USD

CONTRACT SOLD BY: USA 10175

ESP CONTRACT START DATE: 05/28/1994

REPAIR HISTORY

NO REPAIR HISTORY ON VEHICLE

END OF OASIS REPORT FOR 1LNLM82W2RY747871

E802-020 10763

IN THE MAGISTRATE COURT OF COBB COUNTY

STATE OF GEORGIA

PROGRESSIVE MAX INSURANCE
COMPANY AS SUBROGEE OF
FRANCISCO [REDACTED]

Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

CIVIL ACTION FILE

NO.:

03-J-0710

STATEMENT OF CLAIM

Plaintiff files this Statement of Claim against Defendant as follows:

1.

The Defendant Ford Motor Company is a business registered to conduct business in Georgia and is located at the American Road, [REDACTED] Dearborn, Michigan [REDACTED] and is subject to the jurisdiction of this court.

2.

The Defendant Ford Motor Company may be served through its registered agent in the State of Georgia, Corporation Process Company, [REDACTED] Marietta, Georgia [REDACTED]

3.

Venue is proper in this court.

COBB COUNTY, GA
FILED IN OFFICE
03 FEB 21 11:11
CLERK OF COURT

ER02-025 10754

4.

On or about May 24, 2002, Francisco Guiles was operating a 1994 Lincoln Town Car (VIN: LNLMB2W2RY747871) Cobb County, Georgia.

5.

On the date in question, [REDACTED] parked said vehicle at [REDACTED] Marietta, Georgia. (See Exhibit "A")

6.

On or about May 24, 2002, the 1994 Lincoln Town Car caught fire resulting in the total loss of this vehicle.

7.

This fire was a direct result of a manufacturers defect or negligence on behalf of the Defendant Ford Motor Company.

8.

The speed control disconnect switch on the above reference 1994 Lincoln Town Car was a product which was in a defective condition which made it unreasonable dangerous to users.

9.

Ford Motor Company was aware of this defect and the speed control disconnect switch at the time of the fire in question on or about May 24, 2002.

10.

Defendant Ford Motor Company was negligent in the manufacture and use of this defective speed control disconnect switch.

0903-025 15785

11.

Defendant Ford Motor Company owes a legal duty to [REDACTED] and [REDACTED] as Ford engages in the affirmative conduct associated with being a commercial supplier of products.

12.

As the owner and operator of the 1994 Lincoln Town Car, [REDACTED] is a foreseeable Plaintiff and is owed a duty of care by Ford.

13.

Defendant Ford Motor Company breached that duty of care to [REDACTED] and [REDACTED].

14.

The aforementioned fire was the actual and proximate cause of property damage to the aforementioned 1994 Lincoln Town Car.

15.

As a direct and approximate result of the negligence of Defendant [REDACTED] [REDACTED] suffered \$7,238.21 in damages to the 1994 Lincoln Town Car.

16.

Alternatively, Defendant Ford Motor Company is liable under the doctrine of Res Ipsa Loquitur.

17.

Progressive Max Insurance Company has a policy of insurance which provides coverage to [REDACTED] and [REDACTED] for collision damages to the 1994 Lincoln

Town Car. Pursuant to that policy, Progressive paid the sum of \$7,238.21, which includes a \$500.00 deductible paid by [REDACTED] (See Exhibit "B")

WHEREFORE, Plaintiff demands judgment in its favor and against Defendant Ford Motor Company, in the amount of \$7,238.21 in damages to the 1994 Lincoln Town Car.

Respectfully Submitted,

SHUR, MCDUFFIE, WILLIAMS & MORGAN

By 
Steven J. Angles
Georgia Bar No.: 019838
Attorney for Plaintiff

380 Interstate North Parkway
Suite 101
Atlanta, Georgia 30328
(770) 952-3886

EXHIBIT "A"

E982-025 18755

Name of Insured [REDACTED] Home Phone # [REDACTED]
 Address (if D.O. box, include physical address) [REDACTED] Driver's License [REDACTED] State issued GA.
MARIETTA, GA. Social Security # [REDACTED]
 Occupation SENIOR ENGINEER ANALYST Date of Birth 4-28-48 Marital Status M
 Name, Address of Employer [REDACTED] Spouse Name MILSA
[REDACTED] Spouse Employer Name, Address [REDACTED]
[REDACTED] Spouse Employer Phone # [REDACTED]
 Length of Present Employment 4 YEARS Number of Dependents [REDACTED]
 Business Phone [REDACTED] Number of Persons in Household 2
 Current Salary \$5,000.00 How Long Resided at Current Address 21 YEARS
 Annual Household Income 100,000.00

I. THIS SECTION TO BE COMPLETED IF VEHICLE WAS BEING DRIVEN AT TIME OF FIRE
 Where was vehicle being driven to? [REDACTED]
 For what reason? [REDACTED]
 Name, address, phone # of driver [REDACTED]
 Name, address, phone # of all passengers [REDACTED]
 Did you smell smoke or see flames first? [REDACTED] Where did fire appear to start? [REDACTED]
 Did you hear any unusual noises prior to the fire? ☐ Yes ☐ No If yes, describe [REDACTED]
 Did you notice any electrical or mechanical malfunctions prior to the fire? ☐ Yes ☐ No If yes, describe [REDACTED]

II. THIS SECTION TO BE COMPLETED IF VEHICLE WAS PARKED OR UNATTENDED AT TIME OF FIRE
 Specific location where vehicle was parked MARIETTA (2ND LEVEL)
 Reason for being at this location EMPLOYEE PARKING
 Name(s), address(es), phone # (s) of person(s) who left car there [REDACTED]
 Was vehicle locked? ☐ Yes ☐ No Were keys left in car? ☐ Yes ☐ No YES, KEYS IN CAR
 Were windows rolled up? ☐ Yes ☐ No How did you first learn of the fire? ALERT, RING / SAN GUARDIA FLOOR
 Do you suspect anyone of setting fire to your vehicle? ☐ Yes ☐ No If yes, who? THE PARKING DECK
 Was this information given to the Police / Fire Department? ☐ Yes ☐ No N/A

III. COMPLETE ALL ADDITIONAL SECTIONS
 Date of fire 5-20-82 Time 01:30 PM Day of week FR. Amount for which you are making claim Uninsured
 Was fire reported to Fire Department? ☒ Yes ☐ No If no, why not? [REDACTED]
 When was fire reported to Fire Department? DATE 5-20-82 TIME 01:30 PM
 By whom (name, address, phone #) BUILDING SECURITY
 Name, location of responding Fire Department Cobb County Station 19
 Fire Department report # UNKNOWN
 Did police also respond to fire? ☒ Yes ☐ No If yes, name of Police Department Cobb County
 Were you carrying any flammable liquids in vehicle? (examples: spare gas can, starter fluid, etc.) ☐ Yes ☒ No
 If yes, type [REDACTED] Where was container located? [REDACTED]
 Container size [REDACTED]
 Year of vehicle 80 Make Lincoln Model Town Car Body Type [REDACTED] Color Maroon
 Vehicle Identification Number 1LN1W2W877877
 License plate # 117-167 Expiration date 2004 State GA. Odometer reading 135,000
 Certificate of Title [REDACTED] If none, who? [REDACTED]
 Name, address appearing on title [REDACTED] MARIETTA
 Was vehicle previously salvaged, reconstructed, rebuilt, or junked? ☐ Yes ☒ No If yes, explain [REDACTED]
NEW MOTOR - REBUILT
 Has vehicle been damaged during the past three years? ☐ Yes ☒ No Describe each occurrence (location, type, amount of damage, date) [REDACTED]

Were repairs completed? ☒ Yes ☐ No ☐ Partial By whom (name, address, phone #)? [REDACTED]
ARCO AUTO & TRUCK REPAIR, 675 CANTON HIGHWAY, MARIETTA, GA.
 Name, address of insurance company who paid damage claim, if any [REDACTED]
 Have you filed any other insurance claims in the last 3 years (including Homeowners, Boat, Auto, etc.)? ☒ Yes ☐ No
 If yes, describe each claim (type of claim, date, location, & amount paid) [REDACTED]
PAID FOR THE REAR OF ANOTHER VEHICLE - NO DAMAGE TO MY CAR -
ABOUT FOUR MONTHS AGO ON DUNDAS FERRY RD.

☒ Cruise control	☐ ABS brakes	☒ Third glass	☐ Luggage rack
☒ Alarm system	☒ Stereo AM/FM	☐ T-tops	☒ Multi-spoke wheels
☒ Passive	☒ Cassette	☐ Factory	☐ Factory
☐ Non-passive	☐ CD player	☐ After market	☐ After market
Brand type _____	CD player operating		Make _____
	Location _____		
☒ Leather interior	☐ All-wheel drive	☒ Power door locks	☐ Convertible top
		☒ Remote keyless entry	☒ Sun roof

If cellular phone was checked, list phone # and service on WAS NOT CONNECTED
 Was all equipment/accessories operational prior to loss? ☒ Yes ☐ No If no, describe _____

VEHICLE CONDITION (Other Distinctive Features -- Dents, dings, trailer hitch, interior, etc.) Prior to Loss					
	Poor	Fair	Good	Excellent	DESCRIPTION
Paint			☒		
Transmission			☒		
Engine			☒		
Body			☒		
Tires			☒		

1. Who performs routine maintenance service? AERO AUTO & TIRE Date last serviced 5/12
 2. Date of last repair work 6/02 By whom? AERO AUTO & TIRE
 3. Type of repair completed? WHEELS NOT TURNING - HARD TO MOVE WHEN TAIL WHEEL LOCKED
 4. Who performed current state emission test? EMERSON STATION Date test inspected 4/02
 5. Who performed last state inspection? WHEEL - 4/02 Date last inspected 4/02
 6. Pre-insurance inspection completed? ☐ Yes ☒ No If yes, by whom? _____
 Did vehicle purchased/leased? ☒ Yes ☐ No Purchase price \$ 15,256.98
 Name, address, & phone # of dealer or individual you purchased vehicle from
SAVING AUTO KANSAS, CO.
 Trade in vehicle at purchase Trade in allowance _____ How did you learn vehicle was for sale/lease?
 How was vehicle paid for? ☐ Cash ☐ Check ☒ Finance ☐ Other-Explain _____
 Mileage on vehicle at time of purchase/lease 58,000 At time of purchase was the vehicle
 damaged? ☐ Yes ☒ No If yes, describe _____
 If financed/leased, name, address, phone # of company EASTERN FINANCIAL FED. CO. MOBILE
 Account # _____ At the time of the balance due \$ 0 Loan term (months) 48
 Monthly payment \$ 347.00 Date last loan payment made _____ Is account past due? ☐ Yes ☒ No
 If yes, how long? N/A If vehicle leased, length of lease 4/02 What is turn-in date of lease? 6/02
 Have you offered vehicle for sale or trade? ☐ Yes ☒ No When? _____ How much? _____
 Any offers? ☐ Yes ☒ No Who? N/A
 How long was it for sale or trade? N/A Are keys in your possession? ☐ Yes ☒ No
 How many sets of keys? 2 Who has them? THURSDAY
 Were all keys accounted for at time of loss? ☒ Yes ☐ No If no, explain _____

This affidavit must be signed, notarized, and returned by mail to a Progressive Insurance claims office.

Signed _____ Signature Submitter/Completing Affidavit
 Witness _____ Witness Address _____

Subscribed and sworn to before me, this 30th day of May, Year 2002.

Licensed Notary - State Of Oregon

Personally Known
 Identification Produced
OK Driver License

Ford Motor Company

Office of the General Counsel

Ford Motor Company
3 Parklane Boulevard
Parklane Tower West, Suite 300
Dearborn, Michigan 48126-2800

December 2, 2002

Shur, McDuffie, Williams & Morgan
380 Interstate North Parkway
Suite 101
Atlanta, GA 30339
ATTENTION: STEVEN ANGLES

Re: Claimant: [REDACTED]
D/O/E:
Your Claim #: NA

Dear Mr. Angles,

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

800-835 15771

SHUR, McDUFFIE, WILLIAMS & MORGAN

ATTORNEYS AT LAW
NOT A PARTNERSHIP

BRETT F. SHUR
M. ALLEN McDUFFIE
TERENCE D. WILLIAMS
MICHAEL L. MORGAN
PATRICK E. PATE, JR.
DANIEL W. HANCOCK
TAMM M. WALLER
MELISSA L. GILBERT
ROBERT A. GILBERT, JR.
STEVEN J. ANDERSON
JEFFREY P. YANOWSKY
JAMES M. FURBERMAN

380 INTERSTATE NORTH PARKWAY
SUITE 101
ATLANTA, GEORGIA 30339
(770) 862-3805

ALSO ADMITTED IN
FLORIDA
ALABAMA

PROBABLE
(770) 862-3782

SALARIED EMPLOYEES OF
PROGRESSIVE CASUALTY
INSURANCE COMPANY

November 11, 2002

Via Certified Mail - Return Receipt Requested
7009 3400 0010 9735 8385

Ford Motor Company
c/o Corporation Process Company
180 Cherokee St., NE
Marietta, Georgia 30060

RE: Date of Incident: May 24, 2002
Progressive Insured: [REDACTED]

Dear Sir or Madam:

This law firm has been retained by Progressive Max Insurance Company in connection with the above-referenced matter. Please consider this to be my sixty-day demand letter pursuant to O.C.G.A. §33-4-7.

Enclosed you will find a copy of the incident report, NADA Value for the 1994 Lincoln Town Car (VIN: LNLM8ZW2RY747871) owned by [REDACTED], Progressive's insured, one VEHICLE FIRE INSPECTION REPORT by Applied Technical Services, Incorporated, accompanying photographs, and related value and part information for the above referenced vehicle. Please also find a copy of the draft paid by Progressive for all damages resulting from the automobile fire of May 24, 2002.

As you will see from the fire inspection report, experts hired by Progressive concluded that the fire to the above referenced vehicle was caused by the failure of the vehicles speed control disconnect switch. The report also indicates that Ford Motor Company was aware of this defect at the time of this fire.

8882-825 15772

Nissa Quiles
November 11, 2002
Page 2 of 2

Please send us a check in the amount of \$7,238.21 on or before January 11, 2003. We are in the process of preparing a Summons and Complaint on this matter. If it is not resolved within the next sixty days, we will seek a five thousand dollar (\$5,000.00) statutory penalty as specifically authorized by O.C.G.A. § 33-4-7 plus attorney fees in addition to the amount listed above.

Very truly yours,


Steven J. Angles

SJA/dcm
Enclosure

ER02-020 15773

FRI001R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 1

FDID: 03301 INCIDENT NO: 02015727 EXP NO: 00 DATE: 05/24/02 DAY: FRI
ALARM TIME: 10:43 ARRIVE TIME: 10:48 TIME IN SERVICE: 11:47 MUTUAL AID: N
SITUATION: 13/VEHICLE FIRE
ACTION TAKEN: 01/EXTINGUISHMENT

OCCUPANT NAME:
ADDRESS:

PHONE:
SUITE/APT:
CENSUS TRACT: 30321

OWNER NAME:
ADDRESS:

PHONE:
SUITE/APT:

METHOD OF ALARM: 01/TELEPHONE/911 TO FIRE DEPT

STATION: 19 SHIFT: A # ALARMS: 1

FB RESP: 23 # ENGS RESP: 4 # AERIALS RESP: 1 # OTH VEH RESP: 4

FIXED PROPERTY USE: 882/GENERAL VEHICLE PARKING GARAGE.
COMPLEX: 99/OTHER COMPLEX.
IGNITION FACTOR: 00/UNDETERMINED
MOBILE PROPERTY TYPE: 11/AUTOMOBILE.
AREA OF FIRE ORIGIN: 00/AREA UNDETERMINED
LEVEL OF FIRE ORIGIN: 03/20 TO 29 FEET ABOVE GRADE.
HEAT OF IGNITION FORM: 00/FORM OF HEAT OF IGNITION UNDETERMINED
IGNITION EQUIPMENT: 00/EQUIPMENT INVOLVED IN IGNITION UNDETERMI
MATERIAL TYPE: 97/MULTIPLE TYPES OF MATERIAL FIRST IGNITED
MATERIAL FORM: 00/FORM OF MATERIAL UNDETERMINED
EXTINGUISHMENT METHOD: 05/PRECONNECT HOSES WITH TANK WATER
VALUE AT RISK: \$10,000 ESTIMATED \$ LOSS: \$10,000
TOTAL GALLONS WATER USED (ROUNDED TO NEAREST THOUSAND): 0

NUMBER OF STORIES: 0
EXTENT OF FLAME DAMAGE: /
EXTENT OF SMOKE DAMAGE: /
DETECTOR PERFORMANCE: /
SPRINKLER PERFORMANCE: /
AVENUE OF SMOKE TRAVEL: /
MATERIAL TYPE SMOKE: /
MATERIAL FORM SMOKE: /

CONSTRUCTION TYPE: /

IF MOBILE PROPERTY:

YEAR: 1994 MAKE: LINCOLN

MODEL: TOWN CAR

SERIAL NO: 1LNLM82W2RY747871

TAG NO: [REDACTED]

STATE: GA

IF EQUIP INVOLVED IN IGNITION: YEAR:

MAKE:

MODEL:

SERIAL NO:

FIRE SERVICE INJ: 0 OTHER INJ: 0 FIRE SERVICE FTL: 0 OTHER FTL: 0

REPORT BY: 578 [REDACTED]
OFFICER: 578 [REDACTED]

DATE: 05/24/2002

ENR2-625 15774

FBI001R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 2

SUPPLEMENTAL REPORTS

EXPOSURES: 01

HAZMAT REPORTS: 00

CIVILIAN CASUALTY REPORTS: 00

FIREFIGHTER CASUALTY REPORTS: 00

FOREST FIRE REPORTS: 00

UNIT SUMMARY FOR
INCIDENT NO: 02015727
EXPOSURE NO: 00

<u>UNIT</u>	<u>ALARM</u>	<u>ARRIVE</u>	<u>BACK IN SERVICE</u>	<u>FIRST IN</u>
MEQ55	05/24/2002 10:43	05/24/2002 10:54	05/24/2002 10:57	N
ME55	05/24/2002 10:43	05/24/2002 10:54	05/24/2002 10:57	N
E5	05/24/2002 10:43	05/24/2002 10:54	05/24/2002 10:58	N
B21	05/24/2002 10:43		05/24/2002 10:58	N
R5	05/24/2002 10:43	05/24/2002 10:56	05/24/2002 11:01	N
B3	05/24/2002 10:43	05/24/2002 10:50	05/24/2002 11:29	N
T19	05/24/2002 10:43	05/24/2002 10:48	05/24/2002 11:45	N
102	05/24/2002 10:43	05/24/2002 11:00	05/24/2002 11:46	N
B19	05/24/2002 10:43	05/24/2002 10:48	05/24/2002 11:47	Y

0002-020 18775

FBID01R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 3

FDID: 03301 INCIDENT NO: 02015727 EKF NO: 01 DATE: 05/24/02 DAY: FRI
ALARM TIME: 10:43 ARRIVE TIME: 10:48 TIME IN SERVICE: 11:47 MUTUAL AID: N
SITUATION: 19/FIRE-NOT CLASSIFIED
ACTION TAKEN: 04/REMOVE HAZARD

OCCUPANT NAME:
ADDRESS:

MARIETTA GA

PHONE:
SUITE/APT:
CENSUS TRACT:

OWNER NAME:
ADDRESS:

PHONE:
SUITE/APT:

METHOD OF ALARM: 01/TELEPHONE/911 TO FIRE DEPT

STATION: 19 SHIFT: A # ALARMS: 1

FS RESP: 0 # ENGS RESP: 0 # AERIALS RESP: 0 # OTH VEH RESP: 0

FIXED PROPERTY USE: 882/GENERAL VEHICLE PARKING GARAGE.
COMPLEX: 98/NO COMPLEX.
IGNITION FACTOR: 99/OTHER IGNIT.FACTOR NOT CLASSIFIED
MOBILE PROPERTY TYPE: 08/NOT APPLICABLE
AREA OF FIRE ORIGIN: 99/AREA OF ORIGIN NOT CLASSIFIED ABOVE
LEVEL OF FIRE ORIGIN: 03/20 TO 29 FEET ABOVE GRADE.
HEAT OF IGNITION FORM: 89/HEAT SPREADING-HOSTILE FIRE NOT CLASS.
IGNITION EQUIPMENT: 00/EQUIPMENT INVOLVED IN IGNITION UNDETERMI
MATERIAL TYPE: 00/TYPE OF MATERIAL UNDETERMINED
MATERIAL FORM: 10/STRUCTURAL COMPONENT, FINISH, INSUF. INFO.
EXTINGUISHMENT METHOD: 00/METHOD OF EXTINGUISHMENT UNDETERMINED
VALUE AT RISK: \$2,000 ESTIMATED \$ LOSS: \$2,000
TOTAL GALLONS WATER USED (ROUNDED TO NEAREST THOUSAND): 0

NUMBER OF STORIES: 0
EXTENT OF FLAME DAMAGE: /
EXTENT OF SMOKE DAMAGE: /
DETECTOR PERFORMANCE: /
SPRINKLER PERFORMANCE: /
AVENUE OF SMOKE TRAVEL: /
MATERIAL TYPE SMOKE: /
MATERIAL FORM SMOKE: /

CONSTRUCTION TYPE: /

IF MOBILE PROPERTY:
MODEL:
TAG NO:

YEAR: MAKE:
SERIAL NO:

STATE:

F EQUIP INVOLVED IN IGNITION: YEAR:
MODEL:

MAKE:
SERIAL NO:

FIRE SERVICE INJ: 0 OTHER INJ: 0 FIRE SERVICE FTL: 0 OTHER FTL: 0

REPORT BY: 578
OFFICER: 578

DATE: 05/24/2002

ENG2-025 18778

FW1001R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 4

SUPPLEMENTAL REPORTS

EXPOSURES: 01

HAZMAT REPORTS: 00

CIVILIAN CASUALTY REPORTS: 00

FIREFIGHTER CASUALTY REPORTS: 00

FOREST FIRE REPORTS: 00



APPLIED TECHNICAL SERVICES, INCORPORATED

1190 Atlanta Industrial Drive Marietta, GA 30066 (770) 423-1400 Fax (770) 424-6418 e-mail ats@atdab.com

VEHICLE FIRE INSPECTION REPORT

K29220

CLAIM #028246417

INSURED [REDACTED]

DATE OF LOSS: MAY 24, 2002

Prepared for
**SAMANTHA OSBON
PROGRESSIVE INSURANCE COMPANY
1975 LAKESIDE PARKWAY
SUITE 310
TUCKER, GEORGIA 30084**

Prepared by


T. MORRILL, C.F.I.

Reviewed by


R. I. UNDERWOOD, P.E.

*Professional Engineers
Design • Consulting • Testing and Inspection*
Members in: AAFS, ACS, ASM, ASME, ASNT, ASQC, ASTM, AWS, EECT, IAAI, NACE, NCEI, NFPA, SAE
GEORGIA SOCIETY OF PROFESSIONAL ENGINEERS, NATIONAL SOCIETY OF PROFESSIONAL ENGINEERS

800-825-1878

Date 02-22-82
Policy # 363 611 74-2

APPROVAL OF VEHICLE FORMAY A1 282

RECEIVED

03/18/80
0503.00

IF ANY INFORMATION PROVIDED IN THIS STATEMENT IS FALSE, IT MAY BE THE BASIS FOR THE DENIAL OF YOUR CLAIM AND LEGAL ACTION. ALL QUESTIONS MUST BE ANSWERED ON THIS AFFIDAVIT. IF YOU ANSWER TO A QUESTION IS NOT KNOWN, PLEASE FILL IN "UNKNOWN". IF THE QUESTION DOES NOT APPLY, FILL IN "N/A".

Name of Insured	Home Phone
Address	Driver's License
City	Social Security #
State	Date of Birth
Occupation	Marital Status
Name, Address & Phone of Employer	Spouse Name
Length of Present Employment	Spouse Employer Name, Address & Phone
Business Phone	Spouse Employer Phone
Current Salary	Number of Dependents
Annual Household Income	Number of Persons in Household
	How Long Resided at Current Address

L. THIS SECTION TO BE COMPLETED IF VEHICLE WAS BEING DRIVEN AT TIME OF FIRE

Where was vehicle being driven at? _____
For what reason? _____
Name, address, phone # of driver _____
Name, address, phone # of all passengers _____
Did you smell smoke or see flames first? _____ Where did fire appear to start? _____
Did you hear any unusual noises prior to the fire? ☐ Yes ☐ No If yes, describe _____
Did you notice any electrical or mechanical malfunctions prior to the fire? ☐ Yes ☐ No If yes, describe _____

B. THIS SECTION TO BE COMPLETED IF VEHICLE WAS PARKED OR UNATTENDED AT TIME OF FIRE

Specific location where vehicle was parked _____
Reason for being at this location _____
Name(s), address(es), phone # of person(s) who left car there _____
Was vehicle locked? ☐ Yes ☐ No Were keys left in car? ☐ Yes ☐ No
Were windows rolled up? ☐ Yes ☐ No How did you first learn of the fire? _____
Do you suspect anyone of setting fire to your vehicle? ☐ Yes ☐ No If yes, who? _____
Was this information given to the Police / Fire Department? ☐ Yes ☐ No

K. COMPLETE ALL ADDITIONAL SECTIONS

Date of fire 2-22-82 Time 11:30 AM Day of week TUE Amount for which you are making claim Uninsured
Was fire reported to Fire Department? ☒ Yes ☐ No If no, why not? _____
When was fire reported to Fire Department? 2-22-82 Time 11:30 AM
By whom (name, address, phone #)? Building
Name, location of responding Fire Department County
Fire Department report # Unknown
Did police also respond to fire? ☒ Yes ☐ No If yes, name of Police Department County
Were you carrying any flammable liquids in vehicle? (examples: spare gas can, starter fluid, etc.) ☐ Yes ☒ No
If yes, type _____ Where was container located? _____
Container size _____
Year of vehicle 82 Make Local Model Van Body Type Color Hatch Back
Vehicle Identification Number 1J4G4B5W8Y2877
License plate # 117-16-7 Expiration date 2003 Mileage 195,000
Certificate of Title # 363 611 74-2 If none, why? _____
Name, address appearing on title _____
Has vehicle been damaged during the past three years? ☐ Yes ☒ No Describe each occurrence (location, type, amount of damage, date) _____
Were repairs completed? ☐ Yes ☒ No Partial By whom (name, address, phone #)? _____
Name, address of insurance company who paid damage claim, if any _____
Have you filed any other insurance claims in the last 3 years (including Homeowners, Boat, Auto, etc.)? ☐ Yes ☒ No
If yes, describe each claim (type of claim, date, location, amount paid) _____
Name, address of person who damaged vehicle - in damage to my car - _____
About three months ago on Highway 101

Do you or anyone else have additional insurance on this vehicle? ☐ Yes ☒ No

If yes, who? (name, address, phone #)

Name of other insurance company/agent

Any other vehicles in your household? ☐ Yes ☒ No Name of insurance company and agent on these other vehicles

Your prior insurance company and agent ATLANTA CASUALTY

Membership AAA or other road service club? ☐ Yes ☒ No

Club name

Member #

IV. **VEHICLE EQUIPMENT** (check box if vehicle had any of the following, including purchased accessories)

☒ Power windows	☒ Power mirrors	☒ Three-side air bags	☒ Oil transmitter
☒ Air conditioning	☒ Driver-side power seat	☒ Passenger-side air bags	☒ Automatic transmission
☒ Outside phone	☒ Passenger-side power seat	☒ Tire steering wheel	☒ Motorized window lock release
☒ Cruise control	☐ ABS (brake)	☒ Tinted glass	☐ Luggage rack
☒ Stereo system	☒ Stereo AMPM	☐ T-tops	☒ Aluminum wheel covers
☒ Power locks	☒ Cassette	☐ Factory	☐ Factory
☐ Non-power	☐ CD player	☐ After market	☐ After market
Brand type	CD player mounting		Make
	Location		
☒ Leather interior	☐ All-wheel drive	☒ Power door locks	☐ Convertible top
		☒ Power/automatic entry	☒ Sun roof

If cellular phone was checked, list phone # and service co. Was Not Connected
Were all equipment/accessories operational prior to loss? ☒ Yes ☐ No If no, describe

V. **VEHICLE CONDITION (Check Distinguishing Features — Dents, scrapes, trailer hitch, handles, etc.) Prior to Loss**

Part	Front	Rear	Good	Impaired	Description	How	Amount
Exterior							
Transmission							
Engine							
Body							
Tires							

1. Who performs routine maintenance service? Auto Auto & Truck Repair Date last serviced 5/1/02
2. Date of last repair work 5/1/02 By whom? Auto Auto & Truck Repair
3. Type of repair completed? Oil change, filter, spark plugs, etc.
4. Who performed current state emission test? Department of Transportation Date last inspected 4/1/02
5. Who performed last state inspection? None Date last inspected
6. Pre-insurance inspection completed? ☐ Yes ☒ No If yes, by whom?

VI. Date vehicle purchased/leased? 3-11-96 ☐ New ☒ Used Purchase price \$ 15,242.98

Name, address, & phone # of dealer or individual you purchased vehicle from

Auto Auto & Truck Repair, Inc.

Trade in vehicle 1996 Buick Wildcat Trade in allowance \$5,000 How did you learn vehicle was for sale/lease?

How was vehicle paid for? ☐ Cash ☐ Check ☒ Finance ☐ Other Explain

Finance on vehicle at time of purchase/lease \$8,000 At time of purchase was the vehicle

damaged? ☐ Yes ☒ No If yes, describe

If financed/leased, name, address, phone # of company

Account # 123456 At the time of the balance due \$ 0 Loan term (months) 60

Monthly payment \$ 167.00 Date last loan payment made 4/1/02 Is unpaid past due? ☐ Yes ☒ No

If yes, how long? 1/2 If vehicle leased, length of lease 36 What is turn-in date of lease? 4/1/02

Have you offered vehicle for sale or trade? ☐ Yes ☒ No When? None How much?

Any offers? ☐ Yes ☒ No Who? None

How long was it for sale or trade? None Are keys in your possession? ☐ Yes ☒ No

How many sets of keys? 2 Who has them? Insurance

Were all keys accounted for at time of fire? ☒ Yes ☐ No If no, explain

This affidavit must be signed, sworn to, and returned by mail to a Progressive Insurance claims office.

Signature [Signature] Insured Company Agent

Witness [Signature] Address [Address]

Subscribed and sworn to before me, this 30th day of May, Year 2002.

Licensed Notary - John O. Cooper

Personally Known

Identification Produced

GA Driver's License

Notary Public, State of Georgia, My Commission Expires April 1, 2005

Form No. 1001 (04/01)



APPLIED TECHNICAL SERVICES, INCORPORATED

1190 Atlanta Industrial Drive, Marietta, Georgia 30066 • (770) 433-1000

VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 11, 2002

Page 1 of 22

Samantha Osborn
Progressive Insurance
1975 Lakeside Parkway
Suite 310
Tucker, Georgia 30084

Subject

Claim # [REDACTED]
Insured [REDACTED]
Date of Loss: May 24, 2002
Vehicle Fire Inspection

Background

On May 29, 2002, ATS was requested to investigate the origin and cause of a fire that seriously damaged the insured 1994 Lincoln Town Car. It is our understanding that the vehicle was parked in a parking garage, located at [REDACTED] in Marietta, Georgia, at the time the fire was discovered. It is further our information that the insured had a new original equipment manufacture (OEM) engine installed recently, and was experiencing problems with the lights.

On June 6, 2002, the author inspected the vehicle, located at the Verastar holding yard in Winder, Georgia, and developed the following information:

Summary of Results

The fire originated on the driver's side of the engine compartment and is due to a defect in a speed control disconnect switch. Ford Motor Company is aware of this defect; however the construction of the switch removed from the vehicle shows that it is the upgraded switch or a replacement switch for the factory defective switch. Localized heating on the 12-volt plus side of the switch is the cause of the fire.

Observations

This 1994 Lincoln Town Car has been seriously damaged by fire. Overall views of the vehicle are shown in Figures 1 through 5. These views show heavy fire damage to the engine compartment and heavy to moderate smoke damage throughout the interior and moderate smoke damage in the trunk.

EP22-025 10762



APPLIED TECHNICAL SERVICES, INCORPORATED

1150 Atlanta Industrial Drive, Marietta, Georgia 30066 • (770) 423-1000

VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 11, 2002

Page 2 of 22

Observations (Continued)

The vehicle was identified by the manufacturer's ID number on the driver's door shown in Figure 6. Views of the fire and smoke damage to the interior are shown in Figures 7, 8, 9 and 10.

These views show that the fire originated in the engine compartment and moved to the interior through the windshield and passenger's side dash assembly. Fire damage to the front fenders is shown in Figures 11 and 12. It was observed that there was heavier fire damage to the driver's side front fender and wheel assembly (Figure 13) than the passenger's side front fender (Figure 14) and wheel assembly.

Views of the fire damage to the engine compartment are shown in Figures 15, 16 and 17. These views also show heavier fire damage on the driver's side of the engine than on the passenger's side. The area of origin is located below the power brake booster, indicated by the arrow in Figure 18, and shown in closer perspective in Figure 19. The speed control disconnect switch was removed from the vehicle and returned to the ATS laboratory where it was examined. Figure 20 shows the 12-volt plus terminal end, which was located within the switch. It is shown in comparison to a new replacement switch purchased at a local Ford dealer. The exhibit switch contact is indicated by Arrow 1 in Figure 20, and the exemplary switch contact is illustrated by Arrow 2. This localized area of melting was caused by overheating due to contamination inside the switch housing, which lead to arc tracking. If this melting had been the results of an advancing fire, the entire part would be affected.

Conclusion

The fire originated at the driver's side of the engine compartment and was due to the failure of the speed control disconnect switch. Although Ford has replaced the original series of defective speed control disconnect switches, this upgraded switch appears to have suffered the same contamination failure. No evidence was found to indicate that the OEM engine or its installation was responsible for the fire.

2902-025 16753



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

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Figure 1. Insured 1994 Lincoln Town Car.



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VEHICLE FIRE INSPECTION REPORT

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Figure 2. Front and Driver's Side of the Vehicle.



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VEHICLE FIRE INSPECTION REPORT

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Figure 3. Driver's Side and Rear of the Vehicle.



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VEHICLE FIRE INSPECTION REPORT

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Figure 4. Rear and Passenger's Side of the Vehicle.



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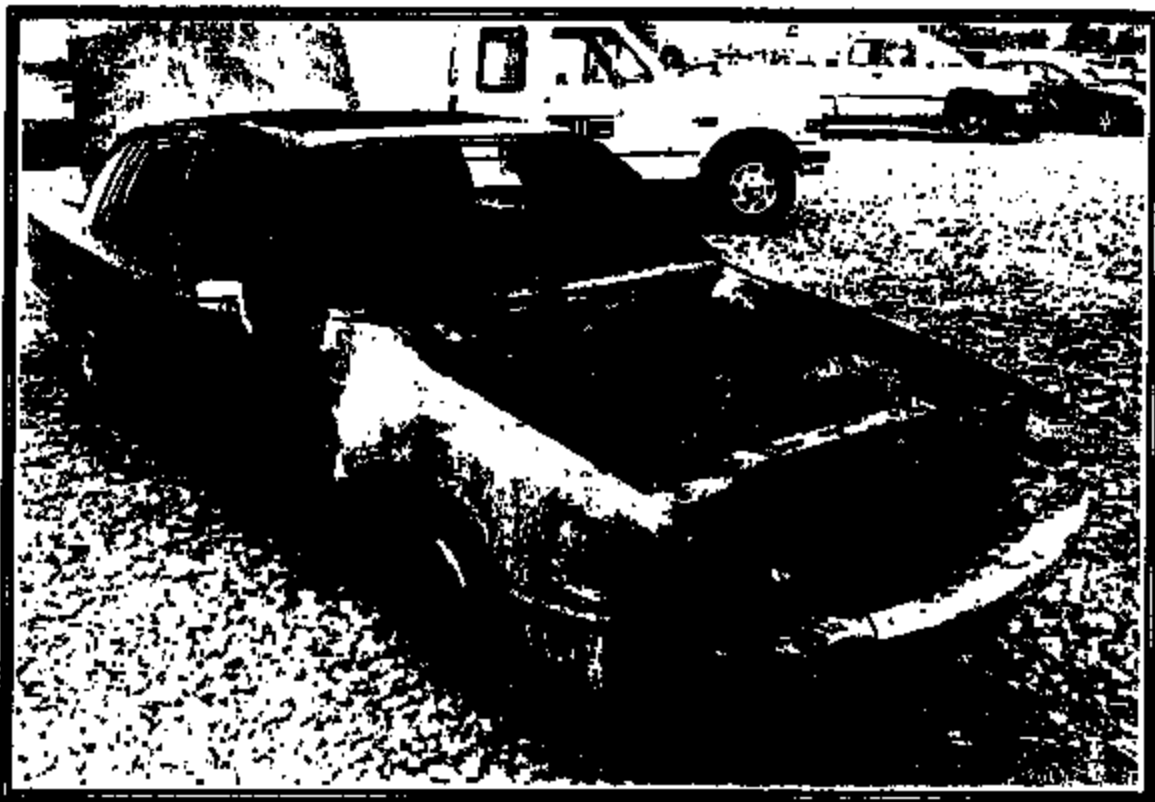


Figure 5. Passenger's Side and Front of the Vehicle.



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VEHICLE FIRE INSPECTION REPORT

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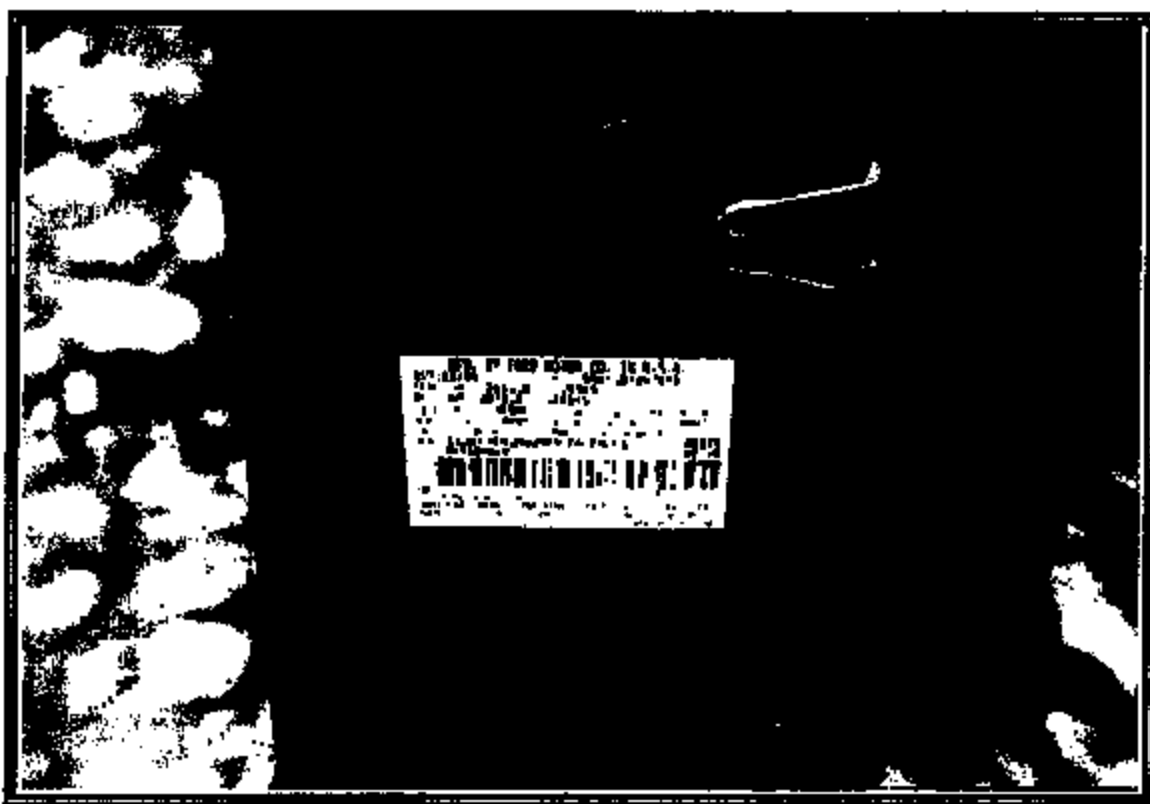


Figure 6. Manufacturer's Identification Label on the Driver's Side Door.



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VEHICLE FIRE INSPECTION REPORT

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Figure 7. Fire Damage to the Front Interior, View from the Driver's Side.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

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Figure 8. Fire Damage to the Rear Interior, View from the Driver's Side.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

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Figure 9. Fire Damage to the Rear Interior, View from the Passenger's Side.



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VEHICLE FIRE INSPECTION REPORT

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Figure 10. Fire Damage to the Front Interior, View from the Passenger's Side.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

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Figure 11. Fire Damage to the Driver's Side Front Fender and Engine Compartment.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

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Figure 12. Fire Damage to the Passenger's Side Front Fender and Engine Compartment.



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VEHICLE FIRE INSPECTION REPORT

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Figure 13. Close-up of the Fire Damage to the Driver's Side Front Fender and Wheel Assembly.



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VEHICLE FIRE INSPECTION REPORT

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Figure 14. Close-up of the Fire Damage to the Passenger's Side Front Fender and Wheel Assembly.



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Figure 15. Fire Damage to the Driver's Side of the Engine Compartment, View from the Driver's Side Front.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

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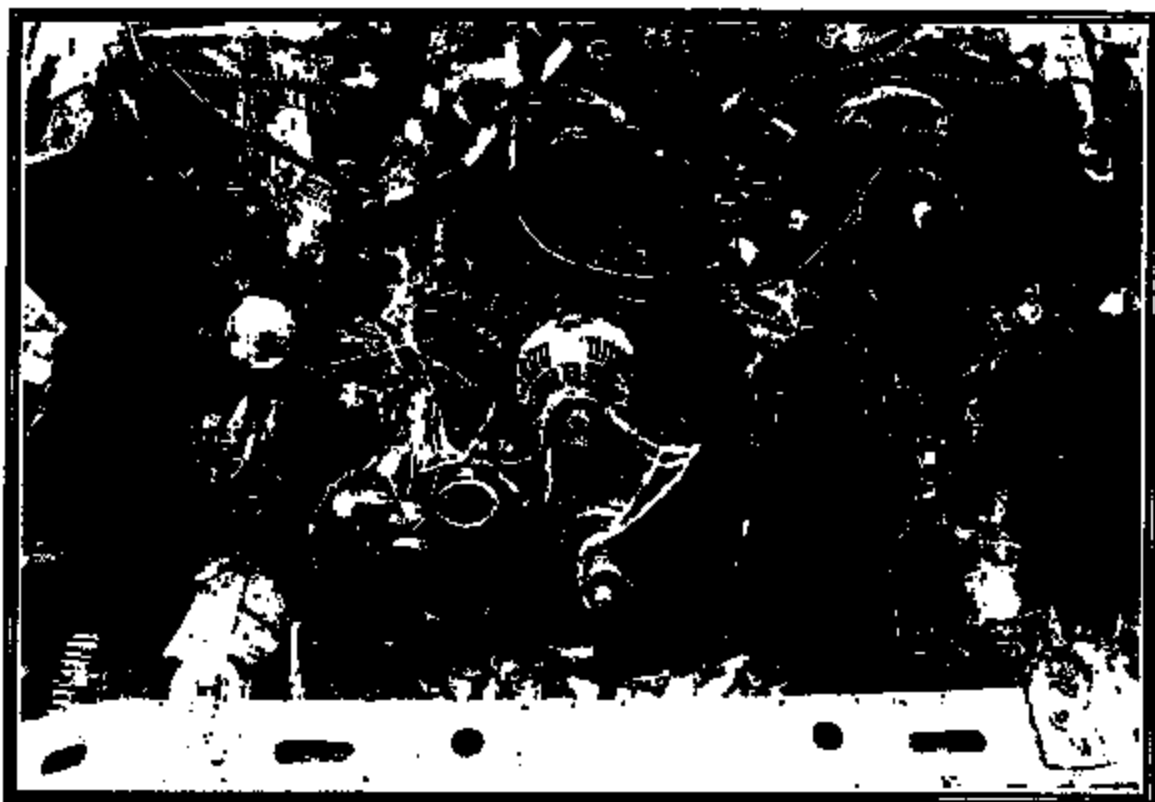


Figure 16. Fire Damage to the Engine Compartment, View from the Front.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

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Figure 17. Fire Damage to the Passenger's Side of the Engine Compartment, View from the Passenger's Side Front.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

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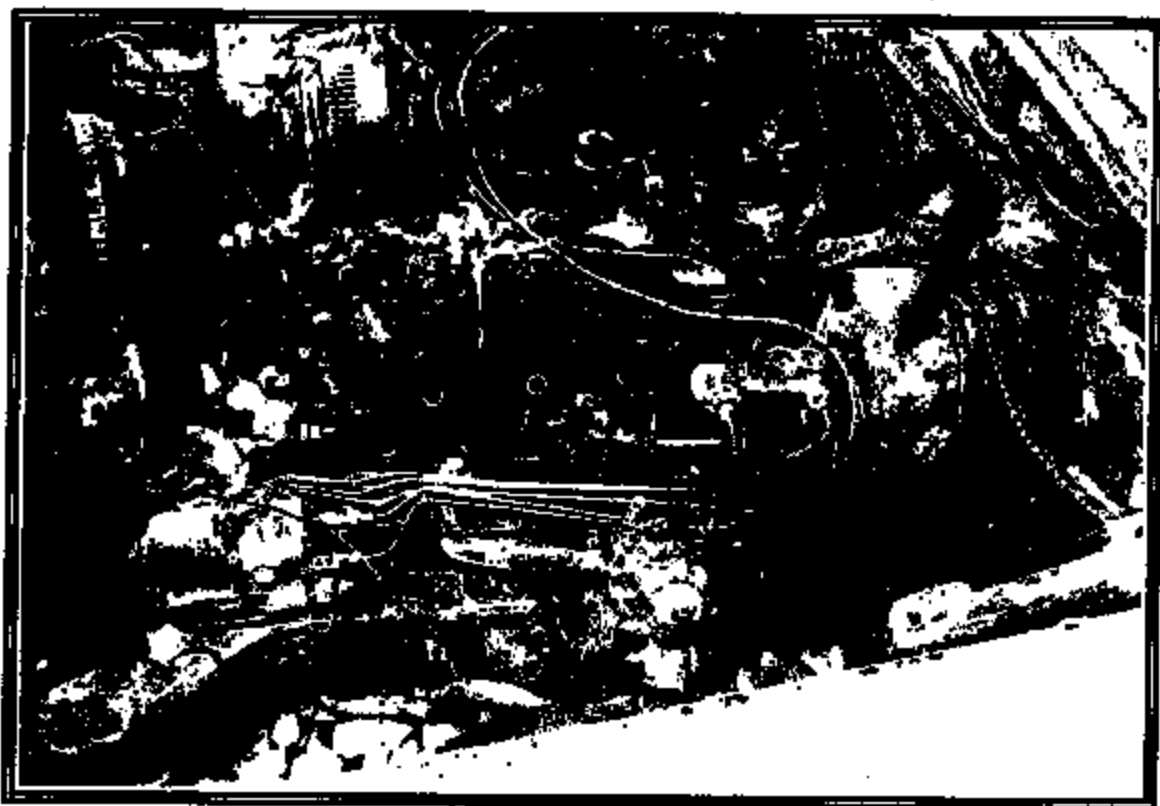


Figure 18. Location of the Area of Origin as Viewed from the Driver's Side.



APPLIED TECHNICAL SERVICES, INCORPORATED

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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

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Figure 19. Close-up of the Speed Control Switch Remains Prior to Removal from the Vehicle.



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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

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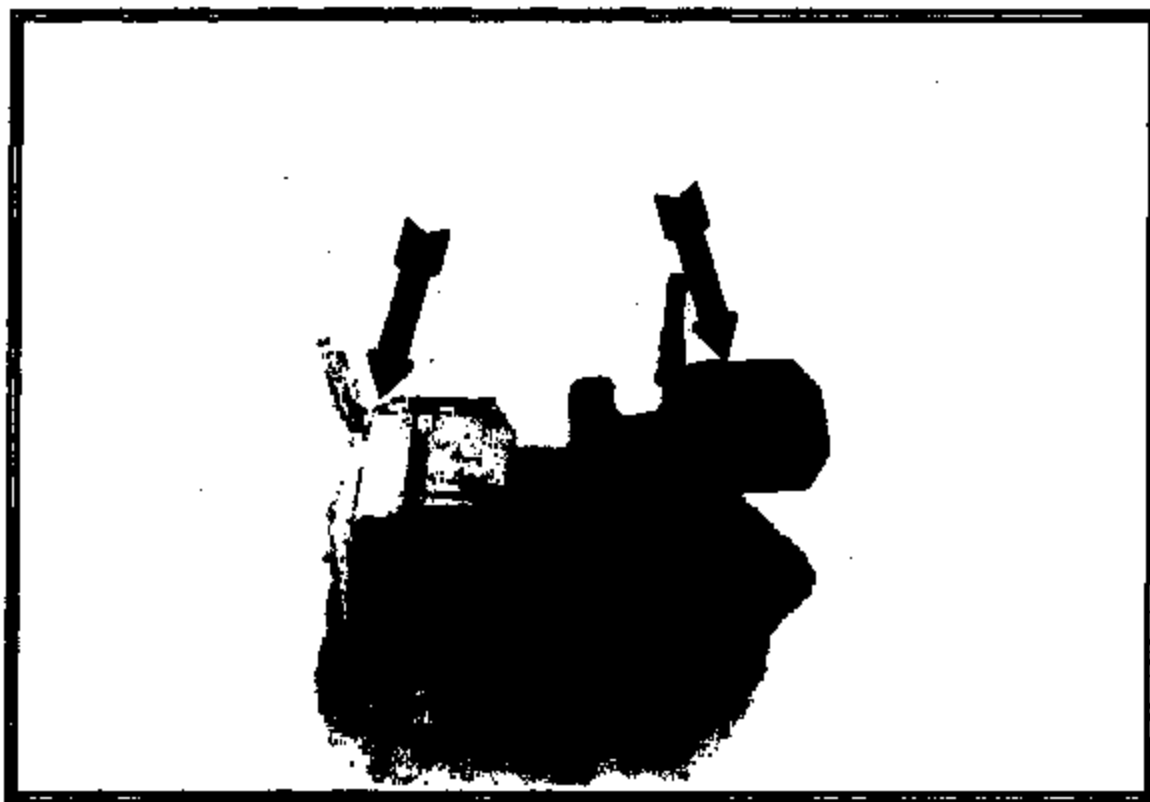


Figure 20. Comparison of the Exhibit and Exemplary 12-Volt Plus Contacts from the Speed Control Disconnect Switch.

Ford Motor Company

Office of the General Counsel

Ford Motor Company
3 Parklane Boulevard
Parklane Towers West, Suite 300
Dearborn, Michigan 48128-3500

August 12, 2002

Progressive Insurance
PO BOX 48258
Richmond Heights, OH 44143
ATTENTION: WILLIAM KIENZL

Re: Claimant: [REDACTED]
DATE: 05-24-2002
Your Claim: [REDACTED]

Dear Mr. Kienzl,

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

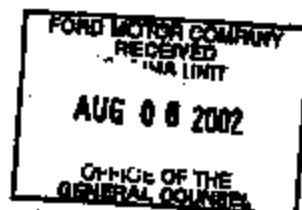
6
EP02-025 18804

PROGRESSIVE

P.O. Box 43258
Richmond Heights, OH 44143
progressive.com

July 26, 2002

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



Re: Defective speed control disconnect switch caused fire and resulting damages
VIN: 1LNLM82W2RY747871
Year: 1994
Make: Lincoln
Model: Town Car
Our Insured: [REDACTED]
Address: [REDACTED] Marietta, GA
Phone: [REDACTED]
Our Claim No: [REDACTED]
Date of Loss: 5/24/02
Damages: \$7,238.21

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. Enclosed please find all supporting documentation.

Please acknowledge receipt of my subrogation demand and forward your payment of \$6,938.21 to my attention, payable to "Progressive Insurance Company, as subrogee 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) 603-5339

REDACTED

2002-025 10000 9

CMSD2340 /CMSM2340

P A C M A N

JUL 26 02 - 8:49

OPID: [REDACTED]

CLAIM PAYMENT INQUIRY

TERMID: VT620040

INSD: [REDACTED]

POL: [REDACTED]

DOL : MAY 24 02 GA-ATL FT-GHP-

CLM: 028246417 ACTIVE

REP: S OSBON

PAY TO THE ORDER OF:

TOTAL DRAFT AMOUNT:

280.00

LINE 1: VERASTAR OF ATLANTA ONLY*****

LINE 2: *****

LINE 3:

ADDRESS: [REDACTED] 7

CITY: WINDER

ST/PR* GA ZIP/CPC: [REDACTED]

CNTRY* US

IN PAYMENT OF: CONF [REDACTED] (94 LINCOLN TOWN CAR...747871)

1099 ? Y

FEDERAL TAX ID: [REDACTED]

LAST UPDT REP: SCM0007

CDS CODE * 23 PCL

EFT TRACE #:

ISSUING REP: S MARTIN

BANK CODE* AS2

ISSUE DATE : JUL 17 02

APPROVED BY: J BLACKMAN

STATE * GA

AREA * 617

REVIEW DATE: 00 00

STOP RSN *

DRAFT #

REVIEWED BY:

COMMAND:

Page: 1 Document Name: untitled

CMSD2340 /CMSM2340

P A C M A N

JUL 26 02 - 8:49

OPID: TUSR813

CLAIM PAYMENT INQUIRY

TERMID: VT620040

INSD: [REDACTED]

POL: [REDACTED]

DOL: MAY 24 02 GA-ATL FT-GRP-

CLM: 028246417 ACTIVE

REP: S OSBON

PAY TO THE ORDER OF:

TOTAL DRAFT AMOUNT:

6,458.21

LINE 1:

[REDACTED] ONLY*****

LINE 2:

LINE 3:

ADDRESS:

CITY: MARIETTA

ST/PR* GA ZIP/CPC: [REDACTED]

CNTRY* US

IN PAYMENT OF: TOTAL LOSS '95 LINCOLN PROGRESSIVE OBTAINS TITLE/SALVAGE

1099

? N

FEDERAL TAX ID:

LAST UPDT REP: SMO0009

CDS CODE * 23 PCL

EFT TRACE #:

ISSUING REP: S OSBON

BANK CODE* AS2

ISSUE DATE: JUN 05 02

APPROVED BY:

STATE * GA

AREA * 591

REVIEW DATE: 00 00

STOP RSN *

DRAFT #

REVIEWED BY:

COMMAND:

Date: 07/26/2002 Time: 08:49:43 AM

REP2-025 18867

**APPLIED TECHNICAL SERVICES, INCORPORATED**

1100 Adams Industrial Drive, Marietta, Georgia 30066 - (770) 422-1400

VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

Page 1 of

Samantha Osborn
Progressive Insurance

Subject

Claim # 028246417

Insured: [REDACTED]

Date of Loss: May 24, 2002

Vehicle Fire Inspection

Background

On May 29, 2002, ATS was requested to investigate the origin and cause of a fire that seriously damaged the insured 1994 Lincoln Towncar. It is our understanding that the vehicle was parked in a parking garage, located at [REDACTED] in Marietta, Georgia, at the time the fire was discovered. It is further our information that the insured had a new original equipment manufacture (OEM) engine installed recently, and some apparent wiring harness problems, which affected the lights.

On June 6, 2002, the author inspected the vehicle, located at the Verastar holding yard in Winder, Georgia, and developed the following information.

Summary of Results

The fire originated on the driver's side of the engine compartment and is most likely due to a short circuit in the wiring harness. The fire spread to the engine compartment and the rest of the vehicle. The fire was extinguished by the fire department. The fire was caused by a short circuit in the wiring harness. The fire was caused by a short circuit in the wiring harness. The fire was caused by a short circuit in the wiring harness.

No evidence was found to indicate that the OEM engine was responsible for the fire. It is possible there was a pre-existing condition within the switch that was aggravated by the removal and subsequent reinstallation of the engine.

**APPLIED TECHNICAL SERVICES, INCORPORATED**

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VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 1, 2002

Page 2 of

Observations

This 1994 Lincoln Towncar has been seriously damaged by fire. Overall views of the vehicle are shown in Figures 1 through 5. These views show heavy fire damage to the engine compartment with heavy to moderate smoke damage throughout the interior and moderate smoke damage in the trunk area. The vehicle was identified by the manufacturer's ID number on the driver's door shown in Figure 6. Views of the fire and smoke damage to the interior are shown in Figures 7, 8, 9 and 10.

These views show that the fire originated in the engine compartment and moved to the interior through the windshield and passenger's side dash assembly. Fire damage to the front fenders is shown in Figures 11 and 12. It was observed that there was heavier fire damage to the driver's side front fender and wheel assembly (Figure 13) than the passenger's side front fender (Figure 14) and wheel assembly.

Views of the fire damage to the engine compartment are shown in Figures 15, 16 and 17. These views, again, show heavier fire damage to the driver's side of the engine and engine compartment than on the passenger's side. The area of origin is located below the power brake booster, indicated by the arrow in Figure 18 and shown in closer perspective in Figure 19. The speed control disconnect switch was removed from the vehicle and returned to the ATS laboratory where it was examined. Figure 20 shows the 12-volt plus terminal end, which would have been within the switch. It is shown in comparison to a new replacement switch purchased at a local Ford dealer. The exhibit switch is indicated by Arrow 1 in Figure 20, and the exemplary switch contact is illustrated by Arrow 2. This localized area of melting activity could only be due to electrical activity in the area of contact. If this were the results of an advancing fire, more likely the entire part would be affected.

Conclusion

[REDACTED]

- Figure 1. Insured 1994 Lincoln Towncar.
- Figure 2. Front and Driver's Side of the Vehicle.
- Figure 3. Driver's Side and Rear of the Vehicle.
- Figure 4. Rear and Passenger's Side of the Vehicle.
- Figure 5. Passenger's Side and Front of the Vehicle.
- Figure 6. Manufacturer's Identification Label on the Driver's Side Door.
- Figure 7. Fire Damage to the Front Interior, View from the Driver's Side.
- Figure 8. Fire Damage to the Rear Interior, View from the Driver's Side.
- Figure 9. Fire Damage to the Rear Interior, View from the Passenger's Side.
- Figure 10. Fire Damage to the Front Interior, View from the Passenger's Side.
- Figure 11. Fire Damage to the Driver's Side Front Fender and Engine Compartment.
- Figure 12. Fire Damage to the Passenger's Side Front Fender and Engine Compartment.
- Figure 13. Close-up of the Fire Damage to the Driver's Side Front Fender and Wheel Assembly.
- Figure 14. Close-up of the Fire Damage to the Passenger's Side Front Fender and Wheel Assembly.
- Figure 15. Fire Damage to the Driver's Side of the Engine Compartment, View from the Driver's Side Front.
- Figure 16. Fire Damage to the Engine Compartment, View from the Front.
- Figure 17. Fire Damage to the Passenger's Side of the Engine Compartment, View from the Passenger's Side Front.
- Figure 18. Location of the Area of Origin as Viewed from the Driver's Side.
- Figure 19. Close-up of the Speed Control Switch Prior to Removal from the Vehicle.
- Figure 20. Comparison of the Exhibit and Exemplary 12-Volt Plus Contacts from the Speed Control Disconnect Switch.

FRI001R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 1

FDID: 03301 INCIDENT NO: 02015727 EXP NO: 00 DATE: 05/24/02 DAY: FRI
ALARM TIME: 10:43 ARRIVE TIME: 10:48 TIME IN SERVICE: 11:47 MUTUAL AID: N
SITUATION: 13/VEHICLE FIRE.
ACTION TAKEN: 01/EXTINGUISHMENT

OCCUPANT NAME:
ADDRESS:

MARIETTA GA

FDZ: [REDACTED]

PHONE:
SUITE/APT:
CENSUS TRACT: 30321

OWNER NAME:
ADDRESS:

PHONE:
SUITE/APT:

METHOD OF ALARM: 01/TELEPHONE/911 TO FIRE DEPT

STATION: 19 SHIFT: A # ALARMS: 1

FS RESP: 23 # ENGS RESP: 4 # AERIALS RESP: 1 # OTH VEH RESP: 4

FIXED PROPERTY USE: 882/GENERAL VEHICLE PARKING GARAGE.
COMPLEX: 99/OTHER COMPLEX.
IGNITION FACTOR: 00/UNDETERMINED
MOBILE PROPERTY TYPE: 11/AUTOMOBILE.
AREA OF FIRE ORIGIN: 00/AREA UNDETERMINED
LEVEL OF FIRE ORIGIN: 03/20 TO 29 FEET ABOVE GRADE.
HEAT OF IGNITION FORM: 00/FORM OF HEAT OF IGNITION UNDETERMINED
IGNITION EQUIPMENT: 00/EQUIPMENT INVOLVED IN IGNITION UNDETERMINED
MATERIAL TYPE: 97/MULTIPLE TYPES OF MATERIAL FIRST IGNITED
MATERIAL FORM: 00/FORM OF MATERIAL UNDETERMINED
EXTINGUISHMENT METHOD: 05/PRECONNECT HOSES WITH TANK WATER
VALUE AT RISK: \$10,000 ESTIMATED \$ LOSS: \$10,000
TOTAL GALLONS WATER USED (ROUNDED TO NEAREST THOUSAND): 0

NUMBER OF STORIES: 0 CONSTRUCTION TYPE: /
EXTENT OF FLAME DAMAGE: /
EXTENT OF SMOKE DAMAGE: /
DETECTOR PERFORMANCE: /
SPRINKLER PERFORMANCE: /
AVENUE OF SMOKE TRAVEL: /
MATERIAL TYPE SMOKE: /
MATERIAL FORM SMOKE: /

IF MOBILE PROPERTY: YEAR: 1994 MAKE: LINCOLN
MODEL: TOWN CAR SERIAL NO: 1LNLM82W2RY747871
TAG NO: [REDACTED] STATE: GA

IF EQUIP INVOLVED IN IGNITION: YEAR: MAKE:
MODEL: SERIAL NO:

FIRE SERVICE INJ: 0 OTHER INJ: 0 FIRE SERVICE FTL: 0 OTHER FTL: 0

REPORT BY: 578 LEWIS KEVIN ROBERT
OFFICER: 578 LEWIS KEVIN ROBERT

DATE: 05/24/2002

8882-825 18811

BI001R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 2

SUPPLEMENTAL REPORTS

EXPOSURES: 01

HAZMAT REPORTS: 00

CIVILIAN CASUALTY REPORTS: 00

FIREFIGHTER CASUALTY REPORTS: 00

FOREST FIRE REPORTS: 00

UNIT SUMMARY FOR
INCIDENT NO: 02015727
EXPOSURE NO: 00

<u>UNIT</u>	<u>ALARM</u>	<u>ARRIVE</u>	<u>BACK IN SERVICE</u>	<u>FIRST IN</u>
MSQ55	05/24/2002 10:43	05/24/2002 10:54	05/24/2002 10:57	N
MHS5	05/24/2002 10:43	05/24/2002 10:54	05/24/2002 10:57	N
SE	05/24/2002 10:43	05/24/2002 10:54	05/24/2002 10:58	N
B21	05/24/2002 10:43		05/24/2002 10:58	N
B5	05/24/2002 10:43	05/24/2002 10:56	05/24/2002 11:01	N
B3	05/24/2002 10:43	05/24/2002 10:50	05/24/2002 11:29	N
T19	05/24/2002 10:43	05/24/2002 10:48	05/24/2002 11:45	N
102	05/24/2002 10:43	05/24/2002 11:00	05/24/2002 11:46	N
B19	05/24/2002 10:43	05/24/2002 10:48	05/24/2002 11:47	Y

ENC-025 10012

FBI001R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 3

FDID: 03301 INCIDENT NO: 02015727 EXP NO: 01 DATE: 05/24/02 DAY: FRI
ALARM TIME: 10:43 ARRIVE TIME: 10:48 TIME IN SERVICE: 11:47 MUTUAL AID: N
SITUATION: 19/FIRE-NOT CLASSIFIED
ACTION TAKEN: 04/REMOVE HAZARD

OCCUPANT NAME:
ADDRESS:

MARIETTA GA

PHONE:
SUITE/APT:
CENSUS TRACT:

OWNER NAME:
ADDRESS:

PHONE:
SUITE/APT:

METHOD OF ALARM: 01/TELEPHONE/911 TO FIRE DEPT

STATION: 19 SHIFT: A # ALARMS: 1

FS RESP: 0 # ENG RESP: 0 # AERIALS RESP: 0 # OTH VEH RESP: 0

FIXED PROPERTY USE: 881/GENERAL VEHICLE PARKING GARAGE.
COMPLEX: 98/NO COMPLEX.
IGNITION FACTOR: 99/OTHER IGNIT.FACTOR NOT CLASSIFIED
MOBILE PROPERTY TYPE: 08/NOT APPLICABLE
AREA OF FIRE ORIGIN: 99/AREA OF ORIGIN NOT CLASSIFIED ABOVE
LEVEL OF FIRE ORIGIN: 03/20 TO 29 FEET ABOVE GRADE.
HEAT OF IGNITION FORM: 89/HEAT SPREADING-HOSTILE FIRE NOT CLASS.
IGNITION EQUIPMENT: 00/EQUIPMENT INVOLVED IN IGNITION UNDETERMI
MATERIAL TYPE: 00/TYPE OF MATERIAL UNDETERMINED
MATERIAL FORM: 10/STRUCTURAL COMPONENT, FINISH, INSUF. INFO.
EXTINGUISHMENT METHOD: 00/METHOD OF EXTINGUISHMENT UNDETERMINED
VALUE AT RISK: \$2,000 ESTIMATED \$ LOSS: \$2,000
TOTAL GALLONS WATER USED (ROUNDED TO NEAREST THOUSAND): 0

NUMBER OF STORIES: 0 CONSTRUCTION TYPE: /
EXTENT OF FLAME DAMAGE: /
EXTENT OF SMOKE DAMAGE: /
DETECTOR PERFORMANCE: /
SPRINKLER PERFORMANCE: /
AVERAGE OF SMOKE TRAVEL: /
MATERIAL TYPE SMOKE: /
MATERIAL FORM SMOKE: /

IF MOBILE PROPERTY:
MODEL:
TAG NO:

YEAR: MAKE:
SERIAL NO:

STATE:

IF EQUIP INVOLVED IN IGNITION: YEAR:
MODEL:

MAKE:
SERIAL NO:

FIRE SERVICE INJ: 0 OTHER INJ: 0 FIRE SERVICE FTL: 0 OTHER FTL: 0

REPORT BY: 578 LEWIS KEVIN ROBERT
OFFICER: 578 LEWIS KEVIN ROBERT

DATE: 05/24/2002

ENC2-325 18612

FEI001R
05/29/2002 09:33

COBB COUNTY DEPARTMENT OF PUBLIC SAFETY
INCIDENT REPORT

PAGE 4

SUPPLEMENTAL REPORTS

EXPOSURES: 01

HAZMAT REPORTS: 00

CIVILIAN CASUALTY REPORTS: 00

FIREFIGHTER CASUALTY REPORTS: 00

FOREST FIRE REPORTS: 00



APPLIED TECHNICAL SERVICES, INCORPORATED

1190 Atlanta Industrial Drive Marietta, GA 30066 (770) 423-1400 Fax (770) 424-6415 e-mail atsi@atsih.com

VEHICLE FIRE INSPECTION REPORT

K29220

CLAIM [REDACTED]

INSURED [REDACTED]

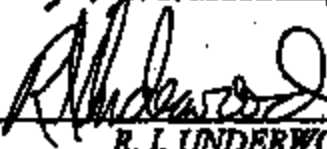
DATE OF LOSS: MAY 24, 2002

Prepared for
SAMANTHA OSBON
PROGRESSIVE INSURANCE COMPANY
1975 LAKESIDE PARKWAY
SUITE 310
TUCKER, GEORGIA 30084

Prepared by


J. T. MORRILL, C.F.I.

Reviewed by


R. I. UNDERWOOD, P.E.

Professional Engineers

Design • Consulting • Testing and Inspection

Members in AIAA, ACE, ASME, ASNT, ASQC, ASTM, AWS, FBCT, IAL, NACE, NCSL, NFPA, SAE

GEORGIA SOCIETY OF PROFESSIONAL ENGINEERS, NATIONAL SOCIETY OF PROFESSIONAL ENGINEERS

EP02-025 10510



APPLIED TECHNICAL SERVICES, INCORPORATED

1190 Atlanta Industrial Drive, Marietta, Georgia 30066 • (770) 433-1400

VEHICLE FIRE INSPECTION REPORT

Ref. K29220

Date July 11, 2002

Page 1 of 22

Samantha Osborn
Progressive Insurance
1975 Lakeside Parkway
Suite 310
Tucker, Georgia 30084

Subject

Claim # [REDACTED]
Insured: [REDACTED]
Date of Loss: May 24, 2002
Vehicle Fire Inspection

Background

On May 29, 2002, ATS was requested to investigate the origin and cause of a fire that seriously damaged the insured 1994 Lincoln Town Car. It is our understanding that the vehicle was parked in a parking garage, located at [REDACTED] in Marietta, Georgia, at the time the fire was discovered. It is further our information that the insured had a new original equipment manufacturer (OEM) engine installed recently, and was experiencing problems with the lights.

On June 6, 2002, the author inspected the vehicle, located at the Vernater holding yard in Winder, Georgia, and developed the following information.

Summary of Results

The fire originated on the driver's side of the engine compartment and is due to a defect in a speed control disconnect switch. Ford Motor Company is aware of this defect; however the construction of the switch removed from the vehicle shows that it is the upgraded switch or a replacement switch for the factory defective switch. Localized heating on the 12-volt plus side of the switch is the cause of the fire.

Observations

This 1994 Lincoln Town Car has been seriously damaged by fire. Overall views of the vehicle are shown in Figures 1 through 5. These views show heavy fire damage to the engine compartment and heavy to moderate smoke damage throughout the interior and moderate smoke damage in the trunk.



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Observations (Continued)

The vehicle was identified by the manufacturer's ID number on the driver's door shown in Figure 6. Views of the fire and smoke damage to the interior are shown in Figures 7, 8, 9 and 10.

These views show that the fire originated in the engine compartment and moved to the interior through the windshield and passenger's side dash assembly. Fire damage to the front fenders is shown in Figures 11 and 12. It was observed that there was heavier fire damage to the driver's side front fender and wheel assembly (Figure 13) than the passenger's side front fender (Figure 14) and wheel assembly.

Views of the fire damage to the engine compartment are shown in Figures 15, 16 and 17. These views also show heavier fire damage on the driver's side of the engine than on the passenger's side. The area of origin is located below the power brake booster, indicated by the arrow in Figure 18 and shown in closer perspective in Figure 19. The speed control disconnect switch was removed from the vehicle and returned to the ATS laboratory where it was examined. Figure 20 shows the 12-volt plus terminal end, which was located within the switch. It is shown in comparison to a new replacement switch purchased at a local Ford dealer. The exhibit switch contact is indicated by Arrow 1 in Figure 20, and the exemplary switch contact is illustrated by Arrow 2. This localized area of melting was caused by overheating due to contamination inside the switch housing, which lead to arc tracking. If this melting had been the results of an advancing fire, the entire part would be affected.

Conclusion

The fire originated at the driver's side of the engine compartment and was due to the failure of the speed control disconnect switch. Although Ford has replaced the original series of defective speed control disconnect switches, this upgraded switch appears to have suffered the same contamination failure. No evidence was found to indicate that the OEM engine or its installation was responsible for the fire.



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Figure 1. Insured 1994 Lincoln Town Car.



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Figure 2. Front and Driver's Side of the Vehicle.



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Figure 3. Driver's Side and Rear of the Vehicle.



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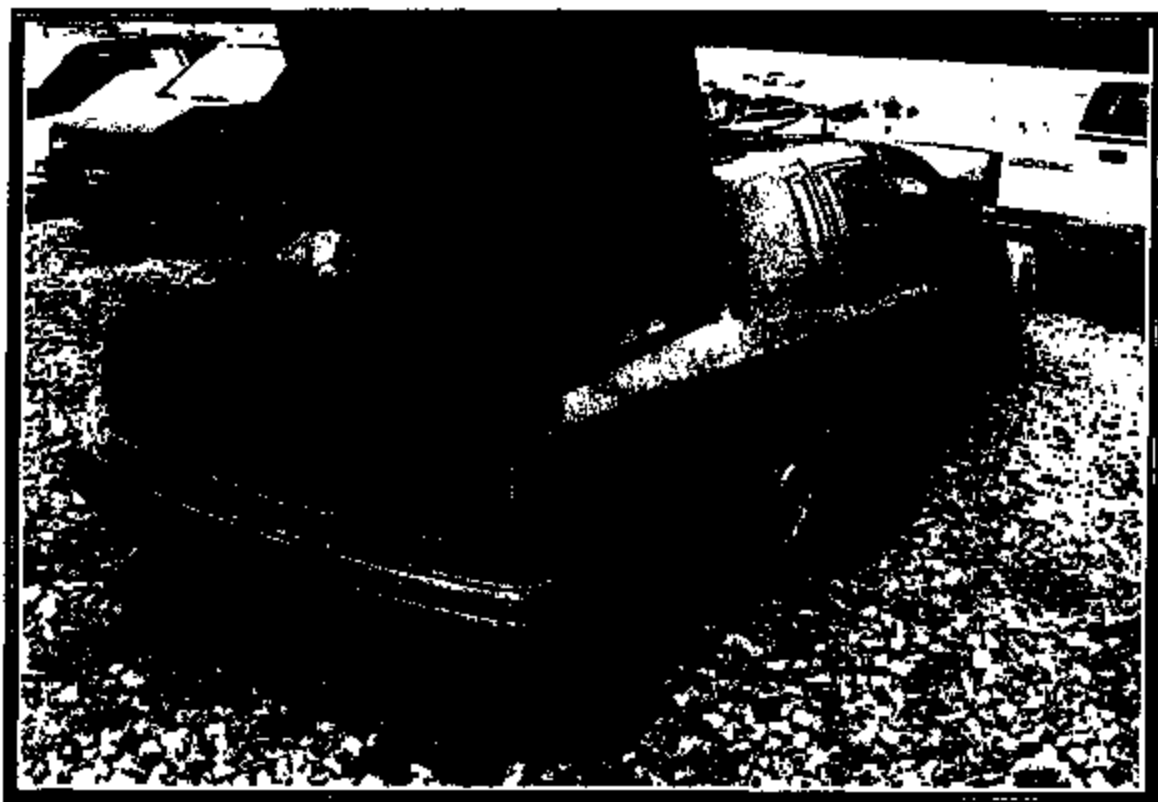


Figure 4. Rear and Passenger's Side of the Vehicle.



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Figure 5. Passenger's Side and Front of the Vehicle:



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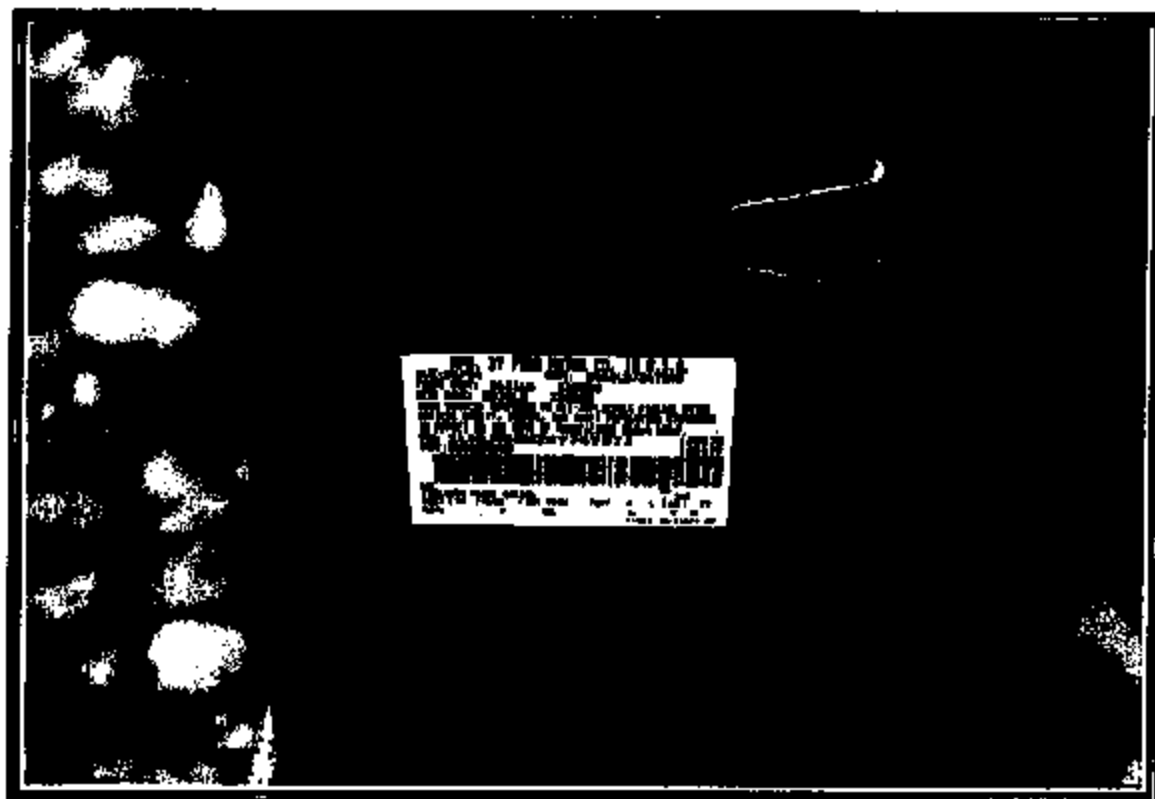


Figure 6. Manufacturer's Identification Label on the Driver's Side Door.



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Figure 7. Fire Damage to the Front Interior, View from the Driver's Side.



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Figure 8. Fire Damage to the Rear Interior, View from the Driver's Side.



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Figure 9. Fire Damage to the Rear Interior, View from the Passenger's Side.



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Figure 10. Fire Damage to the Front Interior, View from the Passenger's Side.



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Figure 11. Fire Damage to the Driver's Side Front Fender and Engine Compartment.



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Figure 12. Fire Damage to the Passenger's Side Front Fender and Engine Compartment.



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Figure 13. Close-up of the Fire Damage to the Driver's Side Front Fender and Wheel Assembly.



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Figure 14. Close-up of the Fire Damage to the Passenger's Side Front Fender and Wheel Assembly.



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Figure 15. Fire Damage to the Driver's Side of the Engine Compartment, View from the Driver's Side Front.



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Figure 16. Fire Damage to the Engine Compartment, View from the Front.



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Figure 17. Fire Damage to the Passenger's Side of the Engine Compartment, View from the Passenger's Side Front.



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Figure 18. Location of the Area of Origin as Viewed from the Driver's Side.



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Figure 19. Close-up of the Speed Control Switch Remains Prior to Removal from the Vehicle.



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Figure 20. Comparison of the Exhibit and Exemplary 12-Volt Plus Contacts from the Speed Control Disconnect Switch.