

EA02-025

FORD 10/27/03

LETTER TO ODI

APPENDIX M

BOOK 16 OF 22

PART A-D

PART A

U.S. DISTRICT COURT
STATE OF ARKANSAS

[REDACTED]

PLAINT

2002-025 2002

UNIT # 829779
TIME _____
MILEAGE 10687
EST. # 15022860911

PLATE _____
NAME (PRINT) _____
SIGNATURE OF PHOTOGRAPHER MURJ

RA# 789052530



IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
JONESBORO DIVISION

FILED

U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

NOV 04 1997



BY: Miller DEPT CLERK
PLAINTIFFS

VS. NO. J-C-97-421

FORD MOTOR COMPANY The name assigned to District Court Judge Wright Jones DEFENDANT

COMPLAINT

Come the Plaintiffs, by and through their attorneys, Huckabay, Munson, Rowlett & Tilley, P.A., and for their cause of action against Ford Motor Company state:

1. [Redacted] are residents of Paragould, Greene County, Arkansas.
2. [Redacted] is a resident of Fort Smith, Sebastian County, Arkansas and owns a rental house located at [Redacted] Paragould, Greene County, Arkansas.
3. Plaintiffs Allstate Insurance Company and Columbia Insurance Company are foreign corporations authorized to do business in Arkansas.
4. The Defendant, Ford Motor Company, is a foreign corporation authorized to do business in Arkansas with its registered agent for service being CT Corporation in Little Rock, Pulaski County, Arkansas.
5. The amount in controversy in this cause of action is in excess of federal jurisdictional units. Therefore, jurisdiction and venue are proper in this Court.

6. The vehicle which forms the basis of this suit is a 1994 Lincoln Towncar Signature four door sedan designed, manufactured, assembled and distributed by Ford Motor Company.

7. The incident which forms the basis of this suit occurred on or about October 6, 1995. The Lincoln Towncar mentioned above was owned by Plaintiff [REDACTED]. On the day before the incident, [REDACTED] parked her Lincoln automobile in her carport at approximately 10:30 p.m. At approximately 8:30 a.m. on October 6, 1995, after being parked undisturbed in the Plaintiffs' carport all night, the Lincoln automobile burst into flames because of a malfunction in the vehicle's electrical system. The defective electrical system put this vehicle in a defective condition and unreasonably dangerous. The fire completely engulfed the Lincoln automobile and quickly spread to the [REDACTED] residence located at 610 North 9-1/2 Street, Paragould, Arkansas causing extensive fire and smoke damage.

8. Thereafter, the fire spread to the rental property owned by Plaintiff, [REDACTED] Paragould, Arkansas and extensive fire and smoke damage occurred.

**COUNT I
STRICT LIABILITY**

9. At all times relevant to the Complaint, Ford Motor Company, was in the business of designing, manufacturing, or otherwise distributing automobiles. The Lincoln Towncar in question was designed, manufactured, and distributed by Ford Motor Company. Moreover, the Lincoln Towncar in question was a defective product and unreasonably dangerous at the time of the incident in question. The defective nature of the vehicle caused it to burst into flames without warning and was the proximate cause of injuries and damages suffered by the Plaintiffs.

COUNT II
NEGLIGENCE

10. Ford Motor Company was negligent in designing, manufacturing, distributing, marketing, instructing, and testing the Lincoln Towncar in question. These acts of negligence proximately caused and/or contributed to injuries and damages suffered by the Plaintiffs.

COUNT III
BREACH OF WARRANTY

11. At all times relevant to the complaint, Ford Motor Company was a "merchant" in the business of supplying "goods". The Lincoln Towncar involved in this case is and was a "good" and/or "product" sold for consumer usage. As such, the defendants breached the warranties of merchantability and fitness for a particular purpose in that the Lincoln Towncar was not fit for ordinary use or for the intended use for which it was purchased. These breaches of warranty proximately resulted in the accident, injuries and damages suffered by the Plaintiffs. Notice has been provided as required by law.

COUNT IV
DAMAGES

12. As a proximate result of the conduct of defendant and the defective Lincoln Towncar automobile, the Plaintiffs have been damaged by the incident in question. The Plaintiffs are seeking monetary damages from the defendants to compensate them for the following elements of damage:

- (1) [REDACTED] property damage to their home located at [REDACTED], Paragould Arkansas; damage to personal property owned by [REDACTED]; other monetary expenses incurred during the repair of the residence listed above; and mental anguish and emotional harm to Plaintiff [REDACTED]

which culminated in her being admitted a facility for treatment of depression resulting from the loss and anxiety surrounding the fire in question; damage to Lincoln automobile referenced herein;

- (2) [REDACTED] property damage to the home located at [REDACTED] [REDACTED] Paragould, Arkansas; damage to personal property located in the home located [REDACTED] loss of rental income; other monetary expenses incurred during the repair of the residence listed above;
- (3) Columbia Insurance Company seeks damage for amount they have paid to [REDACTED] [REDACTED] pursuant to a policy of insurance covering the home located at [REDACTED] Paragould, Arkansas; and
- (4) Allstate Insurance Company seeks damage for monies paid to [REDACTED] [REDACTED] pursuant to a policy of insurance covering a home located at [REDACTED] [REDACTED], Paragould, Arkansas.

13. The Plaintiffs reserve the right to prove the amount of damages at trial. The amount of compensatory damages sought will be in excess of the amount sufficient to establish jurisdiction.

14. The Plaintiffs demand a trial by jury on all issues.

WHEREFORE, the Plaintiffs, [REDACTED] [REDACTED] pray that they have judgment of and against the defendant, Ford Motor Company, for attorneys fees, for their costs, and any and all other proper relief.

Respectfully submitted;

HUCKABAY, MUNSON, ROWLETT & TILLEY, P.A.
17 Commercial Building
400 West Capitol Ave., Suite 1900
Little Rock, Arkansas 72201
(501) 374-6535

By: John E. Moore
JOHN E. MOORE, Bar No. 82111
BOB SEXTON, Bar No. 96106





Unified Investigations & Sciences, Inc.
758 Holcomb Bridge Road
Norcross, Georgia 30071
770-246-0026
Fax 770-246-9438

PRIVILEGED AND CONFIDENTIAL

October 27, 1995

Report Number One

PREPARED FOR: Allstate Insurance Company
Post Office Box 1657
Jonesboro, Arkansas 72403

ATTENTION: James Stidman

INSURED: [REDACTED]

DATE OF LOSS: October 6, 1995

LOSS LOCATION: [REDACTED] Paragould, Arkansas

POLICY NUMBER: [REDACTED]

CLAIM NUMBER: [REDACTED]

UIS FILE NUMBER: GA01-00163

THIS REPORT FURNISHED AS PRIVILEGED AND CONFIDENTIAL TO ADDRESSEE. RELEASE TO ANY OTHER COMPANY,
CONCERN OR INDIVIDUAL IS THE SOLE RESPONSIBILITY OF ADDRESSEE.



EA02-025 20000

Insured:
UIS File No.:

Don. Cunningham
GA01-00163

ASSIGNMENT

Assignment received October 16, 1995 with instructions to conduct a limited scene examination. Investigation commenced October 18, 1995.

EXHIBITS

1. Vehicle Inspection Report.
2. Property Description Sheet for 608 North 9 & 1/2 Street.
3. Property Description Sheet for 610 North 9 & 1/2 Street.
4. Thirty (30) Color Photographs with Photo Explanation Sheet.

RISK

The risk involves a single family dwelling which is described in the attached property description sheet. A second property description sheet is included and describes the property at 610 North 9 & 1/2 Street which belongs to [REDACTED] 1994 Lincoln Continental Town Car, Signature Series, was also involved in this fire and is described in the enclosures.

FIRE SCENE EXAMINATION

[REDACTED] owner and occupant of the property at 610 North 9 & 1/2 Street, Paragould, Arkansas, was present during the fire scene examination. [REDACTED] gave me permission to examine his residence and vehicle during my examination which took place on October 18, 1995.

The only known alteration to the fire scene involved removal of fuses from the distribution panel by Mr. Richard Walls, Adjuster for the Columbia Mutual Insurance Company. Columbia Mutual insures the [REDACTED] residence and the vehicle, and Mr. Walls conducted an inspection of the property during the week of October 9, 1995.

The risk faces east and runs lengthwise in a north/south direction. At the time of the fire, it was occupied by tenants Jeff and Donna Henry. Exterior examination revealed fire attacked the north end of the property, entering into the attic through the north gabled wall and into the northwest bedroom through its north window. Fire ignited contents of the northwest bedroom and extended south through the attic approximately 16 to 18 feet before it was extinguished by the Paragould Fire Department.

All physical evidence indicates the residence located at [REDACTED] Paragould, Arkansas, was a victim of the fire.

Insured:
UIS File No.:

Darrell Cunningham
GA01-00163

Examination of the [redacted] residence located at 619 North 9 & 1/2 Street, Paragould revealed fire origination in the carport area with extension south on to the north wall Cunningham residence. The [redacted] residence also faced east, running length ways in a north/south direction with a single car carport attached to its south end. A 5' x 8' utility room was attached to the west end of the carport, and contained the electrical distribution panel.

A 1994 Lincoln Continental was parked approximately 3/4 length under the carport, entering from its east end. The fire originated under the carport and extended up through the ceiling and roof of the carport, destroying a large portion of the roofing and advanced north across the attic of the main residence. The northern fire advance was stopped by the Paragould Fire Department approximately 20 feet north of the south exterior wall.

Exterior examination of the [redacted] residence failed to reveal evidence of an explosion occurring before or during the fire. The grounds were well attended and the building showed good upkeep.

Interior inspection showed no evidence that major contents or appliances were removed prior to the fire.

The fire from the carport attacked both exterior doors, partially destroying those doors before suppression activity could be commenced. There was no evidence of forcible entry to the Wycoff residence.

Examination and removal of the debris from the floor of the carport revealed a large quantity of stored materials in the open carport. Items included bags of clothing, wicker furniture and cardboard boxes containing books and miscellaneous items. The majority of these components were stored along the base of the south exterior wall of the residence and directly in front of the east wall to the utility room. The west breezeway exit was partially blocked by these stored components.

There were no flammable liquid trails or irregular burn patterns detected on the floor of the carport. Excluding the contents of the utility room, there were no energized appliances or receptacles located under the carport. A single incandescent ceramic light fixture had been mounted in the ceiling of the carport, and was recovered within the debris. Inspection of the light switch mounted inside the kitchen revealed that light was "off" when the fire occurred.

Examination of the utility room revealed the majority of its wooden structural components remained intact though badly charred. A section of its roof was destroyed over its north and east ends, and the fire patterns document fire extension on to the utility room from mid-point in the carport. The electrical distribution panel was mounted to the west wall in the southwest corner, and unburned wooden structural materials remained behind, around and above the panel. The meter base and a cut-off switch panel, located on the west exterior wall also remained intact.

Insured:
UIS File No.:

Dr. J Cunningham
GA01-00163

There is no specific evidence to indicate fire origination, or specific malfunctions in these electrical components.

A single light fixture and receptacle were located within the utility room; however, fire flow patterns exhibited flame impingement on to these components and not away from them. The evidence indicates the utility room, and its contents, were victims of fire and not the area of origin.

The greatest destruction to the [redacted] residence occurred near mid-point in the carport, directly above the engine compartment of the Lincoln Continental. Fire flow patterns extend up from the front section of the vehicle with eventual extension through the ceiling, attic and roofline. Portions of the roof collapsed and were lying on the back portion of the vehicle with very small remains of wooden structural and roofing components recovered on, in and around the front portion of the vehicle. The roof contained approximately four layers of shingles which aided in the horizontal fire spread into the attic of the [redacted] residence and south through the attic gable and on to the [redacted] residence.

The vehicle suffered heavy fire damage throughout its engine, passenger and trunk compartments. Oxidation patterns reflect fire origination at the front of the vehicle with fire flow through the passenger compartment toward the rear. Higher levels of oxidation and distortion were noted on the right front fender and greater destruction occurred to the right front wheel. Fire patterns reflect fire extension from within the engine compartment through the fender well, on to stored combustible materials positioned along the base of the south wall of the residence. The ignited materials were located in a breezeway opening, which facilitated the spread of the fire.

All four tires were partially destroyed, and the vehicle was resting nearly flat on the carport slab. A portion of the roof of the carport was resting across the back of the vehicle, and remained attached to the southeast corner of the residence. [redacted] specifically instructed the vehicle not be moved until after he completed his inventory in the residence. He feared the movement of the vehicle would cause additional collapse of the roof section over the garage, pulling away sections of the south exterior wall to the residence. [redacted] agreed to have the vehicle moved after his inventory was completed.

The vehicle's engine hood was destroyed by the fire, and a large quantity of structural components fell down on to and within the engine compartment. The ceramic ceiling light fixture from the carport ceiling was recovered resting on the bell housing for the transmission.

Numerous small pieces of severely burned wooden structural components were packed around the engine, and roofing tar was melted on to engine components. Roofing tar was also melted on to the steering column and dash materials, indicating the windshield broke before roofing materials became involved in the fire.

Insured:
UIS File No.:



Examination of the engine compartment revealed destruction to hoses, belts, rubber and plastic components along the right side of the engine. The lower radiator hose and some plastic components on the left side of the engine remained partially intact. The right side of the engine exhibited the highest level of fire damage to the vehicle.

The battery and power distribution panel were located in the right front corner of the engine compartment. The majority of electrical circuits contained within the wiring harness also originated in the right front section of the engine compartment. The battery casement and insulation on electrical conductors were destroyed by the fire. Numerous electrical conductors, positioned in the right front corner of the engine compartment, were broken due to debris falling from the ceiling and attic on to and through the engine compartment. The power distribution panel was identified within the debris although it suffered extensive fire damage, as depicted within the attached photos. Field examination of the remains of the power distribution panel failed to identify a specific malfunction due to the extensive damage it received. Laboratory examination is recommended of the remains of the distribution panel and electrical circuits from the right front portion of the engine compartment.

A strong odor of gasoline was detected during the examination, and it was determined the odor was coming from beneath the vehicle in the area of the fuel tank. The vent and fuel nozzle spout was blown from the filler spout, out on to the floor of the carport, and the fuel spout access door was extended to its open position with remains of carport structural components resting on it, in an open position. No documentation of rupture to the fuel tank could be made because of the limitations set forth by [REDACTED]. The vehicle could not be raised sufficiently to examine the fuel tank and undercarriage without moving the section of carport roofing resting on the vehicle.

PRELIMINARY FINDINGS

Based upon the observations and analyses made during the fire scene examination, evidence documents fire origination in the right front corner of the engine compartment to a 1994 Lincoln Town Car, Signature Series, belonging to [REDACTED] Paragould, Arkansas. Field conditions and restrictions on the investigation made it impossible to document a specific malfunction on the part of the vehicle relative to the fire cause. I recommend an electrical engineer be associated with the investigation and allowed to inspect the electrical components in the area of origin for the fire in an effort at documenting a malfunction towards subrogation.

It is further recommended the vehicle be removed from the fire site and taken to a storage facility where it can be examined jointly by the fire investigator and electrical engineer in furtherance of the analysis. The fire investigator should be present when the vehicle is removed from the fire site in order to recover any components which may separate from the vehicle during movement.

Insured:
UIS File No.:



Recorded statements should be obtained from the [redacted] regarding maintenance and operation of the vehicle, and a neighborhood canvas conducted in an effort to locate potential eye witnesses to the fire.

Fire department investigators and firefighters should be interviewed regarding their observations during suppression activity and follow up investigation.

I await your further instructions regarding these activities.

James F. Swain
Senior Investigator
901-853-1517
800-816-1699

Vehicle Inspection Report

Own [REDACTED] USF File Number G.A. [REDACTED]
 Manufacturer Lincoln-Mercury Year 94 Mfg. Town Car Signature Body Style 4 door - sedan
 State Inspection Burned Date 10-18-95 Odometer Burned (19,000)
 Displayed on Vehicle Burned Year 10-18-95 State GA VIN No. 1N1M82708PY720247
 Tag Number Burned Examination Location 610 NORTH 9th St. PEARSON, GA
 Vehicle Expiration Date 10-18-95
 Fire Damaged Areas Exterior Interior Engine Compartment

	Burned	Distorted/Melted	Accelerant Patterns	Collision Damage
Bumper and Grill	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hood	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Left Front	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Right Front	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Roof	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E Left Door(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Right Door(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
X Trunk	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Left Rear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T Right Rear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rear Bumper Area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E Underside	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Remarks Vehicle parked under tarp that burned extensively

TIRES

	Burred		Unusual Tread Wear		Tires indicate signs of recent removal or exchange? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Wheels or wheel covers indicate recent removal/exchange? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Yes	No	Yes	No		
Left Front	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Right Front	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Left Rear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Right Rear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Spare	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Indicate areas of forced entry Door(s) Hood Trunk Glass

Remarks _____

GLASS

	Scuffed	Cracked	Distorted/Melted	Broken
Windshield	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Left Door(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Right Door(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Rear	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sunroof	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Remarks _____

	Yes	No	Remarks
I After market electrical accessories	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Standard Equipment</u>
N Door(s) open during fire	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
T Window(s) open during fire	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
E Was key in the ignition/floor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
R Have any accessories been removed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
I Any unusual burn patterns	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
O Any abnormal melting	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
R Any unusual objects in vehicle	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Was trunk open during fire	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Any unusual objects in trunk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	Yes	No
C O	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E M	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
N F	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
G A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
H	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E M	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
N	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Remarks Owner refused to allow vehicle to be moved by wrecker
to allow inspection of undercarriage.

	Missing	Burned/Damaged	Brittle/Meled	Shredded/Arched
E L	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Remarks _____

	Missing	Burned	Distorted/Meled
T	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
S	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F S	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
U I	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E O	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
L N	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A S	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
N Y	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B S	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T	Any loose fuel line connections? <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>
E	Any evidence of tampering? <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>
M	Fuel tank <input checked="" type="checkbox"/> Unknown <input type="checkbox"/> Empty <input type="checkbox"/> 1/4 <input type="checkbox"/> 1/2 <input type="checkbox"/> 3/4 <input type="checkbox"/> Full	<input type="checkbox"/>	<input type="checkbox"/>

Remarks Filler cap blown out of Sport. Unable to inspect undercarriage
components.

Evidence of any explosion or rupture Yes No
 Was an oil sample obtained? Yes No Laboratory _____
 Was a fuel sample obtained? Yes No Laboratory _____
 Were debris samples obtained? Yes No Laboratory _____

Comments Permission to move the vehicle will have to be obtained
from owner before inspecting and can be completed.

Investigator Tina Smith

Date 10-17-95

ER62-025 28876

Property Description

Insured [REDACTED] UIS No. GA [REDACTED]
 Street [REDACTED] City Paragould State AR
 Occupancy: Dwelling Business Unoccupied Other _____
 Owner occupied Tenant occupied Approximate age 34 years
 Building construction: Masonry Metal Wood Other _____
 Roofing construction: Composition material Metal Tile Wood
 Tar and gravel Other _____
 Number of stories 1 Number of rooms 5 Number of baths 1
 Foundation: Basement Concrete slab Pier and beam Crawl space
 Heating: Electric Natural gas Propane gas Other _____
 Air conditioning: Electric Natural gas Propane gas Other window units
 Electrical service connected Yes No Unknown
 Alarm system: Yes No Type _____ Local Monitored
 Garage: None Attached Detached Approximate size 12 x 24
 Outbuildings on premises Yes No Damaged Undamaged
 Outside Conditions: Normal Unkempt Well groomed Other _____
 Loading Conditions: Excellent Average Poor Other _____
 Fire protection: Paid Paid & Volunteer Unknown Volunteer
 Department Paragould AR Distance to Station 3.5 miles
 Completed during examination Diagram Video Photographs Measurements
 Date examination began 10-18-95 Date examination completed 10-18-95

Property Description

Insured [REDACTED] UFS No. GA [REDACTED]
 Street [REDACTED] City Paragould State AR
 Occupancy: Dwelling Business Unoccupied Other _____
 Owner occupied Tenant occupied Approximate age _____ years
 Building construction: Masonry Metal Wood Other _____
 Roofing construction: Composition material Metal Tile Wood
 Tar and gravel Other _____
 Number of stories 1 Number of rooms 6 Number of baths 1
 Foundation: Basement Concrete slab Pier and beam Crawlspace
 Heating: Electric Natural gas Propane gas Other central
 Air conditioning: Electric Natural gas Propane gas Other central
 Electrical service connected Yes No Unknown
 Alarm system: Yes No Type _____ Local Monitored
 Garage: None Attached Detached Approximate size 12x16
 Outbuildings on premises Yes No Damaged Undamaged
 Outside Conditions: Normal Unkept Well groomed Other _____
 Building Conditions: Excellent Average Poor Other _____
 Fire protection: Paid Paid & Volunteer Unknown Volunteer
 Department Paragould, AR Distance to Station _____
 Completed during examination: Diagram Video Photographs Measurements
 Date examination began 10-18-95 Date examination completed 10-15-95

Insured:
UIS File No.:

PHOTOGRAPH EXPLANATION SHEET

1. View showing the east and south sides of the Wyncoff residence, depicting fire flow.
2. View of rear of [REDACTED] residence, showing meter base and westward fire flow.
3. View of the [REDACTED] carport and vehicle, with overlay, depicting fire flow south on to the north end of the Cunningham residence, and north into the [REDACTED] residence.
4. View showing fire extension into the northwest bedroom of the [REDACTED] residence.
5. Overall view of the collapsed carport to the [REDACTED] residence.
6. View showing the front of the vehicle and the oxidation patterns on the fenders and bumper.
7. Overall view of the vehicle, depicting oxidation patterns originating in the engine compartment with fire flow toward the rear.
8. Overall view of the right side of the vehicle, showing heavy oxidation to the right front fender.
9. Overall view of the engine compartment.
10. Close up view of the right side engine compartment, depicting fire flow from right to left.
11. View of molten tar and roofing residue along with the severely distended roof of the vehicle.
12. Depicts remains of molten copper electrical conductors that fell from the ceiling level and adhered to the right front fender of the vehicle.
13. View of the interior, taken from the rear, showing fire flow from front to rear.
14. View of the underside of the roof, showing fire flow from the front to rear.
15. Overall view of the carport and the vehicle after debris removal.

Insured:
UIS File No.:



PHOTOGRAPH EXPLANATION SHEET

16. Overall view of the front of the vehicle, depicting fire damage to the engine compartment.
17. Overall view, looking down into the engine compartment.
18. Overall view of the engine compartment, showing area of origin in the right front corner based upon oxidation patterns.
19. Close up view of the area of origin for the fire.
20. Depicts fire flow from the right front corner of the engine compartment towards the left and rear.
21. Overall view of the left side of the engine compartment for comparison purposes.
22. Depicts oxidation and distortion to the right front fender, grille and engine components beginning in the right front corner.
23. Shows the remains of the power distribution panel.
24. Depicts higher-levels of destruction to the right front wheel.
25. Interior view of the dash showing fire extension through the right side fireball.
26. Overlay with arrows indicating molten roofing materials on the dash and remains of windshield components.
27. View of the fuel filler spout.
28. Fuel nozzle spout blown out of the filler spout during the fire.
29. Remains of the ceramic incandescent light fixture from the ceiling of the carport.
30. Overall view of the electrical distribution panel.

United Investigations & Sciences, Inc.

Exhibit 4

Insured: [REDACTED]

UIS File #: G A 00163



Photo #

1

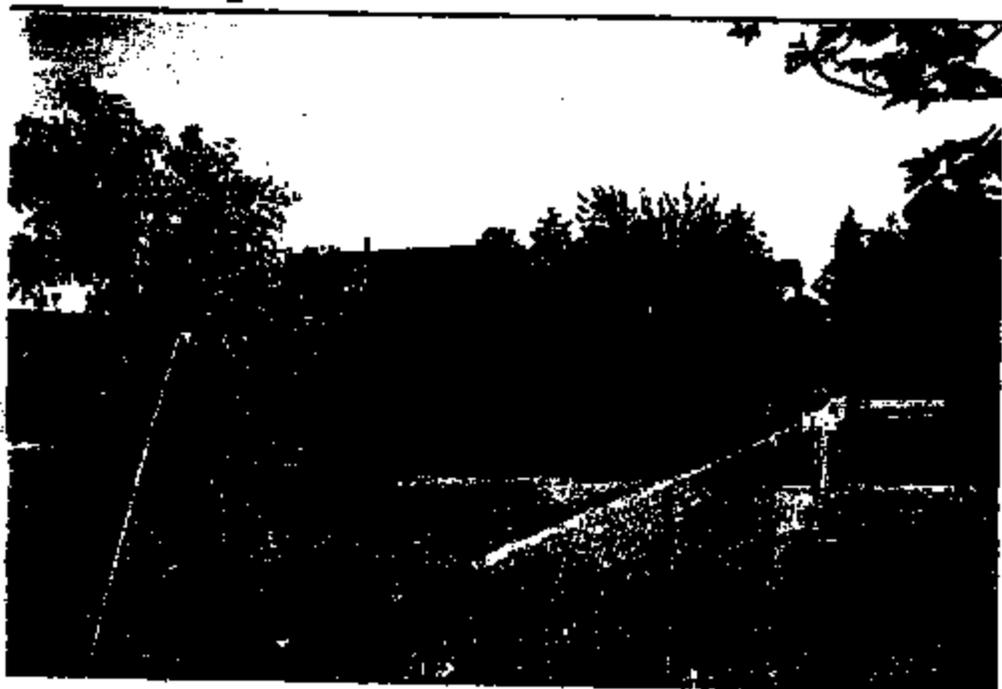


Photo #

2

U002-025 20001

Unified Investigations & Sciences, Inc.

Insurance: [REDACTED]

UIS File #: GA 00163



Photo #

3



Photo #

4

United Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: CA 00163



Photo #

6

Unified Investigations & Sciences, Inc.

Insured

UIS File#: CA 00163

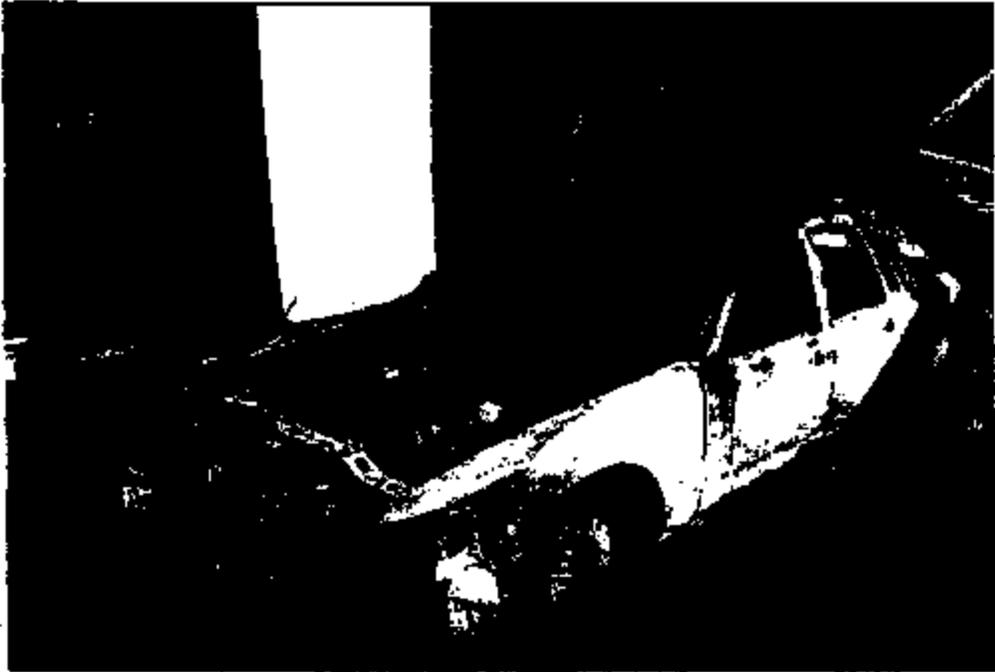


Photo #

7



Photo #

8

Heavy oxidation

ER82-025 20004

Unified Investigations & Sciences, Inc.

Insured

UIS File #: GA 00163



Photo #

9



Photo #

10

Unified Investigations & Sciences, Inc.

Exposed: [REDACTED]

UIS File #: G-100163



Photo #

11



Photo #

12

URS-025 20066

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA 00163



Photo #

18



Photo #

19

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA 00163



Photo #

15

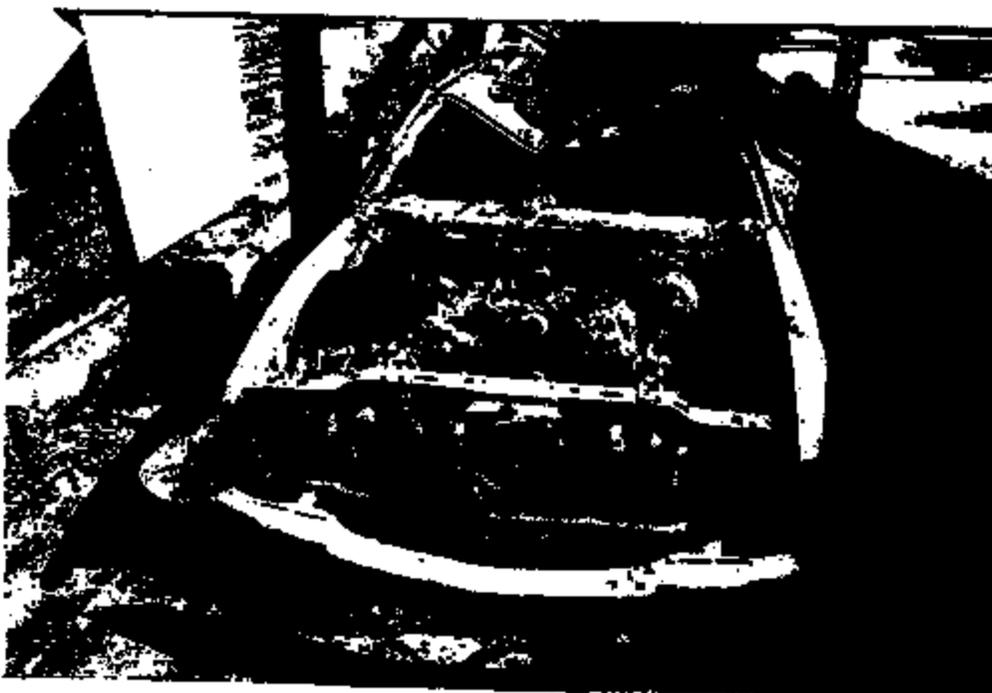


Photo #

16

ENC-025 20000

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File # GA 00163



Photo #

17



Photo #

18

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA 00163



Photo #

19



Photo #

20

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #:

GA 00163



Photo #

21



Photo #

22

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA 00163



Photo #

23



Photo #

24

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #:

GA 00163



Photo #

25



Photo #

26

ENR2-625 20003

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA 00163

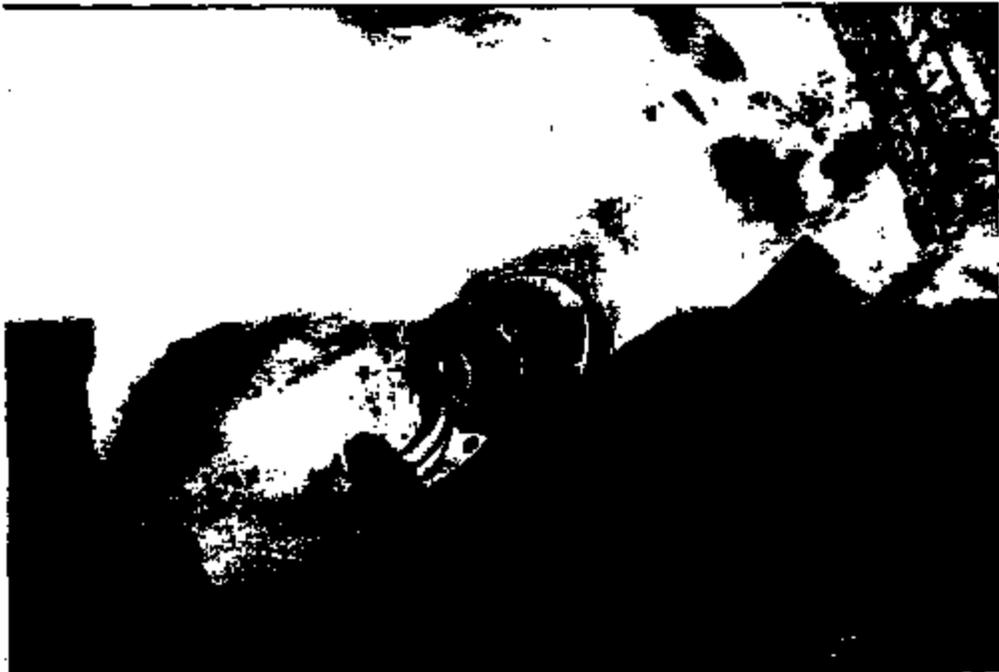


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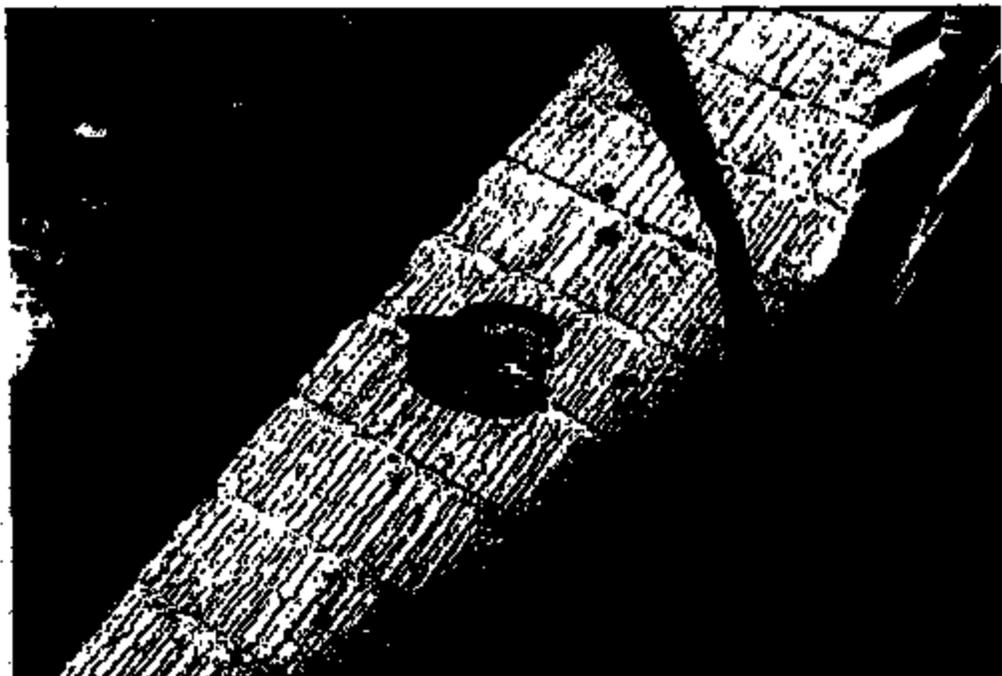


Photo #

28

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA 00163

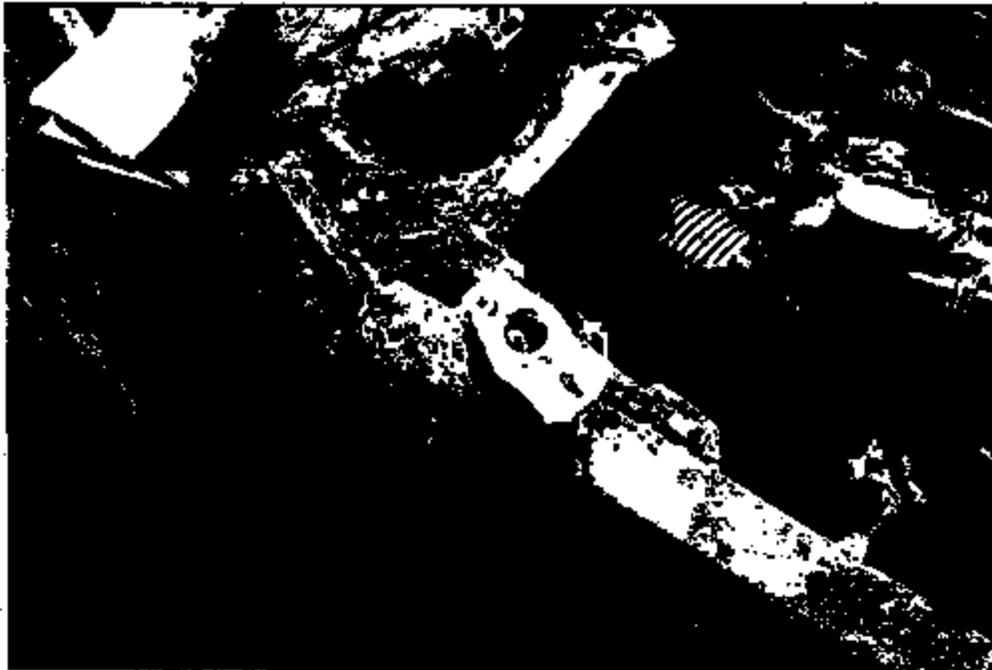


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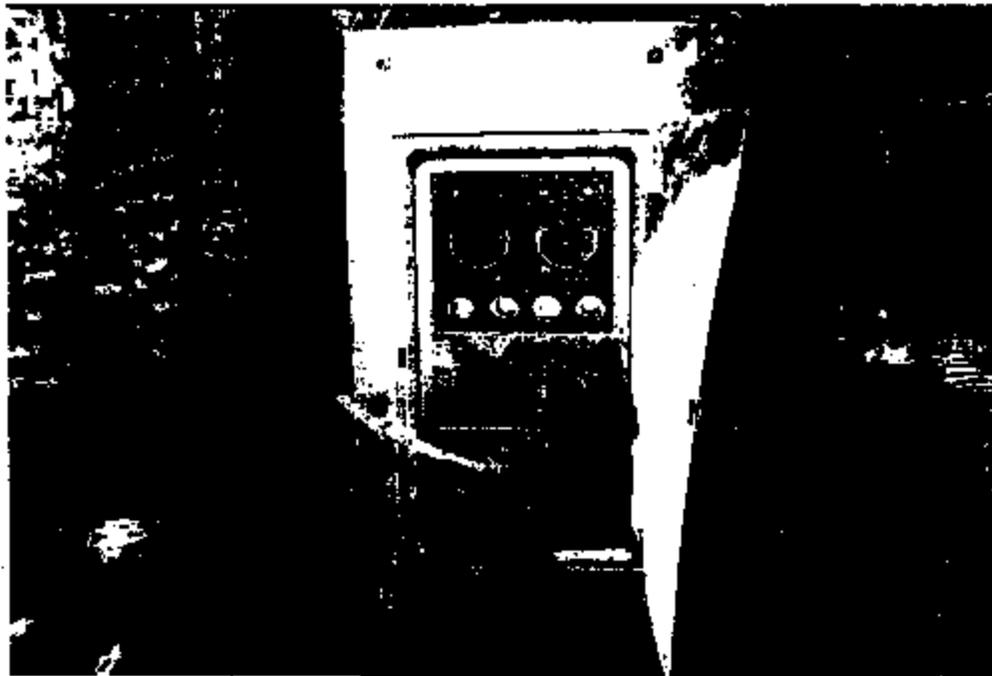


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30



Unified Investigations & Sciences, Inc.
758 Holcomb Bridge Road
Norcross, Georgia 30071
770-246-0026
Fax 770-246-9438

PRIVILEGED AND CONFIDENTIAL

January 24, 1996

Report Number Two

PREPARED FOR: Allstate Insurance Company
Post Office Box 1657
Jonesboro, Arkansas 72403

ATTENTION: James Stidman

INSURED: [REDACTED]

DATE OF LOSS: October 6, 1995

LOSS LOCATION: [REDACTED] Paragould, Arkansas

POLICY NUMBER: [REDACTED]

CLAIM NUMBER: [REDACTED]

UIS FILE NUMBER: [REDACTED]

THIS REPORT FURNISHED AS PRIVILEGED AND CONFIDENTIAL TO ADDRESSEE, RELEASE TO ANY OTHER COMPANY,
CONCERN OR INDIVIDUAL IS THE SOLE RESPONSIBILITY OF ADDRESSEE.



EA82-825 28996

Insured: [REDACTED]
UIS File No.: GA01-00163

ASSIGNMENT

Assignment received October 16, 1995 with instructions to conduct a fire scene examination. A report was submitted on October 27, 1995.

On October 24, 1995, additional instructions were received from James Stidman to return to the fire site and with the remission of [REDACTED] remove the 1994 Lincoln Towncar from his residence to a storage facility. This work was completed on October 24, 1995.

EXHIBIT

1. Thirty (30) color photographs with explanation sheet.

FIRE SCENE EXAMINATION

In furtherance of this analysis, [REDACTED] owner of the residence at [REDACTED] Paragould, Arkansas, was contacted and permission obtained to continue examination of the vehicle and his residence. Permission was also obtained to remove the vehicle from the carport to a storage facility for safe keeping. Arrangements were made with Davenport Wrecker Service of Paragould, Arkansas to remove the vehicle and a contractor hired by Mr. Stidman was present to brace sections of the residence to keep further damage from occurring to the residence during removal of the car and prevent injury to persons in and out of the residence during the investigation.

Prior to removal of the vehicle, additional photographs were taken (Exhibit 1). These photographs depict general fire flow patterns observed during the initial and follow up investigation, giving further indication the fire originated in the right front corner of the 1994 Lincoln Towncar, Signature Series, owned by [REDACTED]. The photographs describe the fire origination in and fire flow from the right front corner of the engine compartment, documenting flame extension from the vehicle north onto stored combustibles on the floor of the carport around the front and right side of the vehicle. Ignition of the stored combustible materials in turn produced sufficient temperatures to ignite the south exterior wall of the residence, ceiling of the carport and the carport storage room. A substantial fire resulted with flame impingement to the south onto the north wall of the residence owned by [REDACTED].

As stated in Report Number One, dated October 27, 1995, and as indicated in a prior verbal report, the evidence documents fire origination in the right front corner of the engine compartment of the Lincoln, which is an area containing the battery and numerous electrical components, including a power distribution panel which remains energized on the vehicle at all times. The power distribution panel is supplied with electrical current through direct hook up with a 12 volt battery and is therefore capable of discharging its energy subsequent of

Insured: [REDACTED]
UIS File No.: GA01-90163

malfunction. The inspection revealed extensive damage to the power distribution panel and its associated components and as much of these components as possible were recovered and retained from the fire site and placed with the vehicle at the RV Center on Highway 412 East in Paragould, Arkansas.

INVESTIGATION

[REDACTED] were interviewed during the initial and follow up site visits and subsequently a recorded statement was obtained from the [REDACTED] by Mr. Stidman. The Wycoffs indicate on the evening prior to the fire the vehicle was driven approximately 3 to 4 miles, parking it under the carport around 10:00 P.M., on October 5, 1995.

[REDACTED] smokes; however, she indicates it is her habit to utilize a drinking glass as an ashtray, which is kept in the cup holder in the vehicle. Each time she smokes in the car she utilizes the glass and when she exits the vehicle the glass is taken inside and the ashes dumped and the glass cleaned for reuse. [REDACTED] stated she was not smoking at the time she pulled under the carport and parked the car on the evening prior to the fire.

Regarding the operation of the vehicle, [REDACTED] stated she had driven the car the night before the fire and to her knowledge it had functioned properly with no indications of malfunctions in the dash controls or indicator lights. Upon exiting the vehicle, no odors or fuel or burning materials were detected and the car had not made any unusual noises while being driven or as it was parked under the carport. [REDACTED] further indicates she did not drive over or on top of any combustible materials or other components which may have become lodged under the engine compartment and ignited from the heat of the engine.

On Thursday, October 3, 1995, [REDACTED] conducted general housekeeping and she stacked some unwanted furniture and other household materials along the exterior of the south wall of the residence, in the breezeway and along the front of the storage building. She was certain none of the stored materials were in contact with the car or in close enough proximity to become ignited from the heat of the vehicle's engine or exhaust. She was very careful when she used the car after she had stacked the components under the carport to avoid touching any of those materials and scratching the vehicle. [REDACTED] stated these materials were stacked in such a manner they would not fall over onto the car or fall and roll under the car. It was her intention to discard some of the household materials and to give others to friends and charity. [REDACTED] did not take out any additional trash and specifically did not empty any ashtrays or smoking refuse into trash containers under the carport on the day or preceding the fire.

Based upon the contact and information obtained from [REDACTED], smoking materials can be eliminated as having any connection to the cause of this fire.

Regarding repair history on the vehicle, [REDACTED] indicated the vehicle was taken to the Lincoln/Mercury dealership approximately one month prior to the fire. At the time of my

Insured: [REDACTED]
ULS File No.: GA01-00163

contact, he could not specifically recall the problem involved. He indicates he will cooperate with Mr. Stidman and assist in obtaining repair orders from the dealership. [REDACTED] could offer no additional information regarding the fire.

As suggested in the original report, Mr. Stidman will conduct a neighborhood canvass and contact fire department officials to obtain information relative to the fire.

DETERMINATION OF ORIGIN AND CAUSE

Based upon the observations and analysis made during the fire scene examination, it is my opinion fire involving Darrel Cunningham's residence was a victim of fire extension from a fire originating at the residence of [REDACTED]

Further, the fire originated from an undetermined malfunction in the electrical system of a 1994 Lincoln Towncar, Signature Series, owned by [REDACTED] and parked under the carport of his residence at the time of the fire. Specific fire patterns originate in the right front corner of the engine compartment in the immediate area of a power distribution panel and associated electrical circuits. The power distribution panel and its associated components received extensive fire damage. Field examination failed to identify a specific malfunction on its part, based solely upon the remains recovered from within the debris and remaining attached to the vehicle.

Evidence to document the power distribution panel and its associated electrical components as the fire cause are:

1. Fire flow patterns extending from the power distribution panel outward onto the battery, right side fender well and other engine compartment components.
2. Elimination of smoking materials in connection to the cause of the fire.
3. Elimination of electrical house wiring associated with the residence, carport and storage building.
4. The severity of fire damage to the right front corner of the engine compartment in comparison with other sections of the vehicle.

COMMENTS

I am awaiting copies of the transcribed statements from the [REDACTED] witnesses and fire officials obtained during your follow up investigation. Please enclose any repair orders or repair history information regarding this vehicle with the statements.

Insured: [REDACTED]
UIS File No.: GA01-00163

Based upon the amount of damage received by the vehicle and specifically to the power distribution panel and electrical circuits in the area of origin for the fire, I am uncertain an inspection of the vehicle and its components by an electrical engineer will further the investigation. The amount of combustibles on the vehicle, along with those positioned on the floor of the carport around the vehicle and the wooden structural materials of the house, caused extensive fire damage and may have destroyed the component or materials involved in the cause of this fire.

If you decide to have the vehicle examined by an electrical engineer, please contact me and I will be available to assist in the inspection in furtherance of the analysis. Any additional information obtained through the review of the statements or other materials used in this analysis will be commented on in a supplemental report.

James F. Swain
Senior Investigator
901-853-1517

JFS/da

Insured: [REDACTED]
UIS File No.: GA01-00163

PHOTOGRAPH EXPLANATION SHEET

- #1. View taken from the roof of the [REDACTED] residence looking south depicting flame extension north from the carport into the roof line.
- #2. View taken from the east slope of the roof of the [REDACTED] residence looking south depicting flame extension from the carport south onto the north wall of the [REDACTED] residence.
- #3. View of the flame impingement onto the south exterior wall of the [REDACTED] residence from the carport. The attached arrow points to the area of heaviest burn which is directly above the right front fender of the Lincoln.
- #4. Interior view of the south wall of the [REDACTED] residence depicting flame impingement from the carport into the residence.
- #5. View of the upper section of the storage room showing higher levels of destruction to wooden components immediately in front of the right side of the Lincoln.
- #6. Overall view of the front of the vehicle depicting higher levels of destruction to wooden structural components making up the ceiling and roof over the carport.
- #7. View looking down onto the front half of the vehicle from the roof line depicting oxidization patterns and fire damage originating in the right front corner of the engine compartment and extending outward.
- #8. Close up view of the fire damage to the right front fender and right front portion of the engine compartment depicting fire origination and outward flame extension.
- #9. Comparative view of the left front fender and left portion of the bumper.
- #10. View of the right front fender and right side of the bumper depicting higher levels of oxidization and distortion in comparison to the left side.
- #11. View of the right front wheel and right front fender for comparative purposes with the left front wheel and fender. Higher levels of damage occurred to the right side components.
- #12. Overall view of the engine compartment.

HR2-025 30001

Insured: [REDACTED]
UIS File No.: GA01-00163

- #13. Close up view of the right front corner of the engine compartment where the power distribution panel was located.
- #14. View of the electrical circuits routed along the interior of the right side fender well within the right front portion of the engine compartment.
- #15. View of the remains of the battery exhibiting fire damage from flame impingement onto its rear and upper surfaces.
- #16. View of the remains of numerous small gauge electrical circuits located in the immediate area of origin for the fire. These components were damaged during fall down of debris from the roof of the carport.
- #17. View of the remains of relays and other electrical components from the power distribution panel in the right front corner of the engine compartment.
- #18. View of the fire damaged components from the remains of the power distribution panel and other electrical components in the right front corner of the engine compartment.
- #19. View of the remains of a printed circuit board recovered from the debris in the right front corner of the engine compartment.
- #20. Overall view of the left side of the vehicle after it was removed from the carport.
- #21. Overall view of the right side of the vehicle depicting higher levels of fire damage, particularly at the right front fender.
- #22. View of the underside of the engine compartment depicting fire flow from the right front corner toward the left and the rear as indicated by the remains of hose materials along the left front portion of the engine compartment.
- #23. Close up view of the underside of the engine.
- #24. View of the front cross member depicting higher levels of oxidation and discoloration to the right side evidencing fire flow from right to left within the engine compartment.
- #25. View of the underside on the right front corner of the engine compartment.
- #26. View of the rear undercarriage.

Insured: [REDACTED]
UIS File No.: GA01-00163

- #27. View of the carport after removal of the vehicle.
- #28. View of electrical circuits with portions of insulation remaining intact on the wiring harness routed through the dash.
- #29. View of the electrical receptacle within the storage shed at the west end of the carport.
- #30. View of the construction workers bracing the front porch and southeast corner of the [REDACTED] residence.

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

1

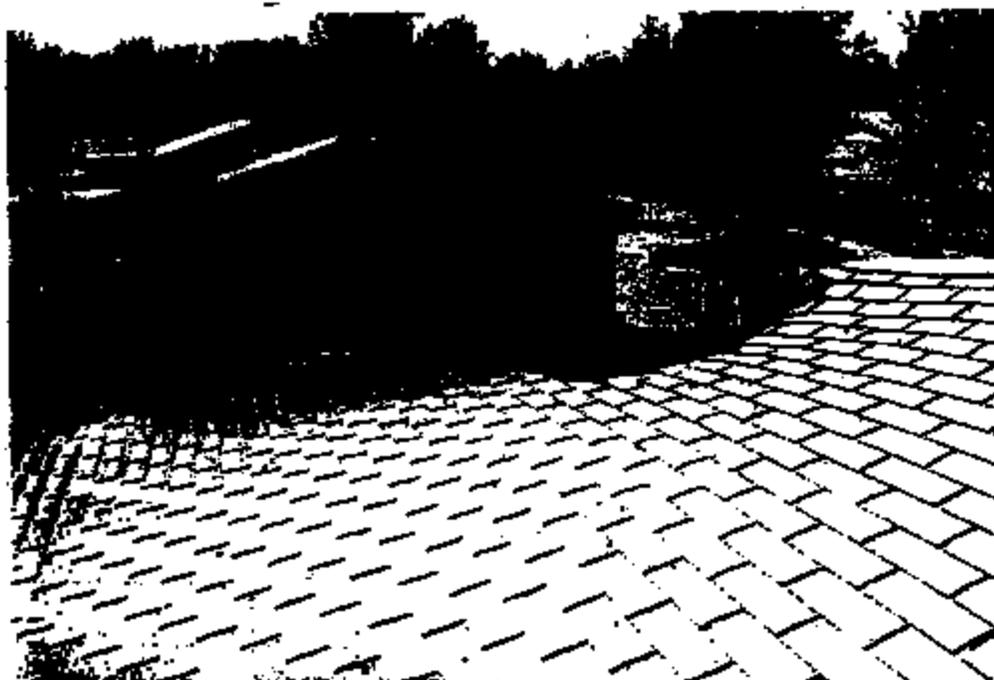


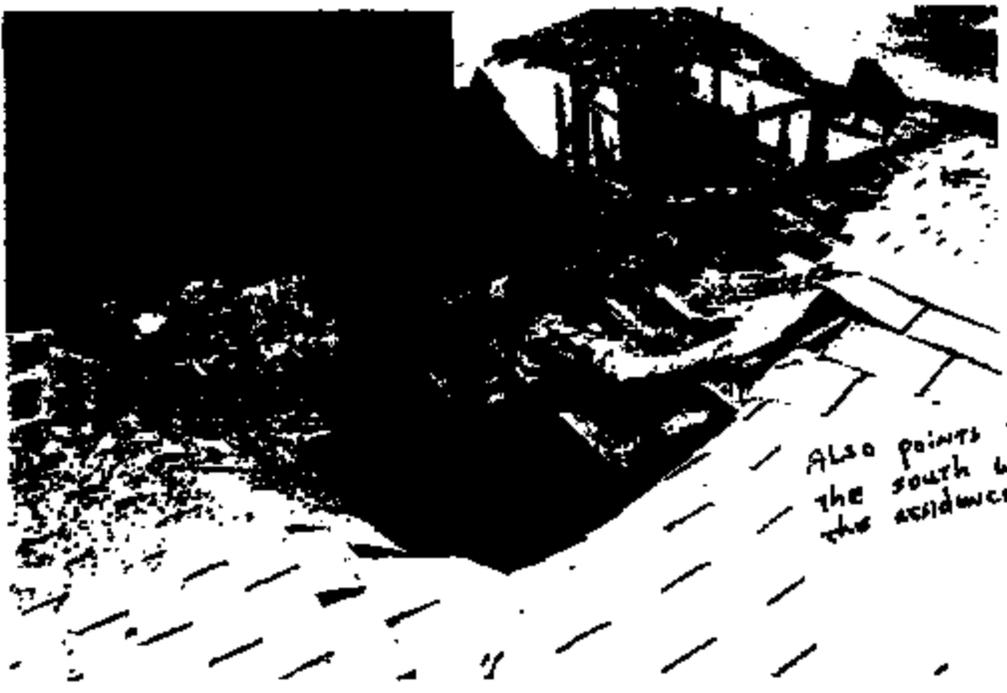
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2

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA 00163



Also points to
the south wall of
the residence.

Photo #

2



Photo #

4

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA 00163

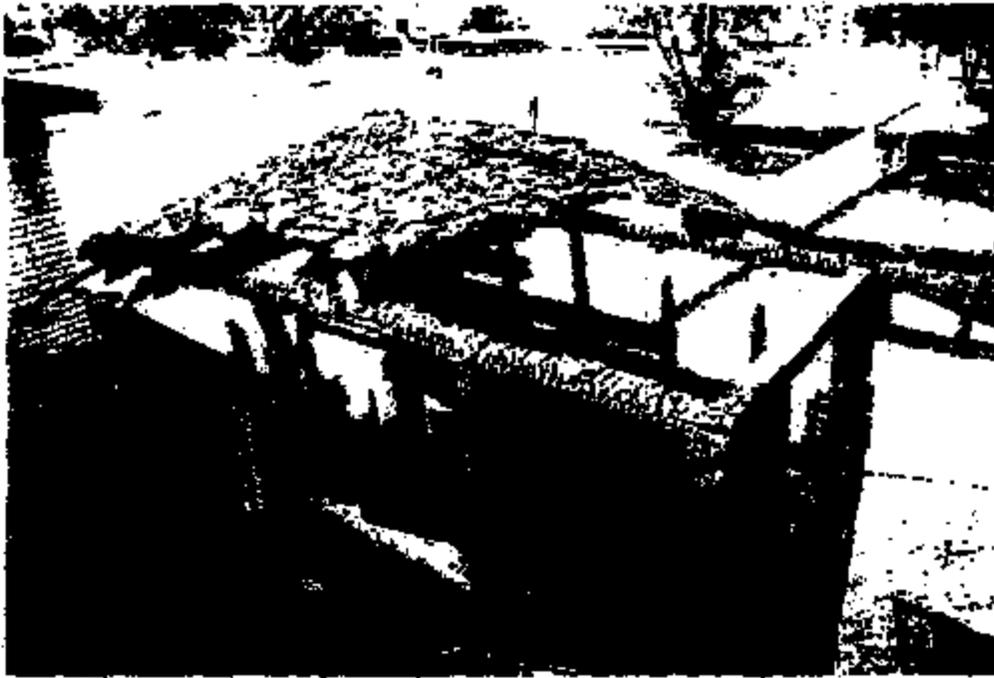


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Unified Investigations & Sciences, Inc.

Intured: [REDACTED]

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Photo #

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Photo #

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ENR2-828 10007

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: CA00163



Photo #

9



Photo #

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Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

11

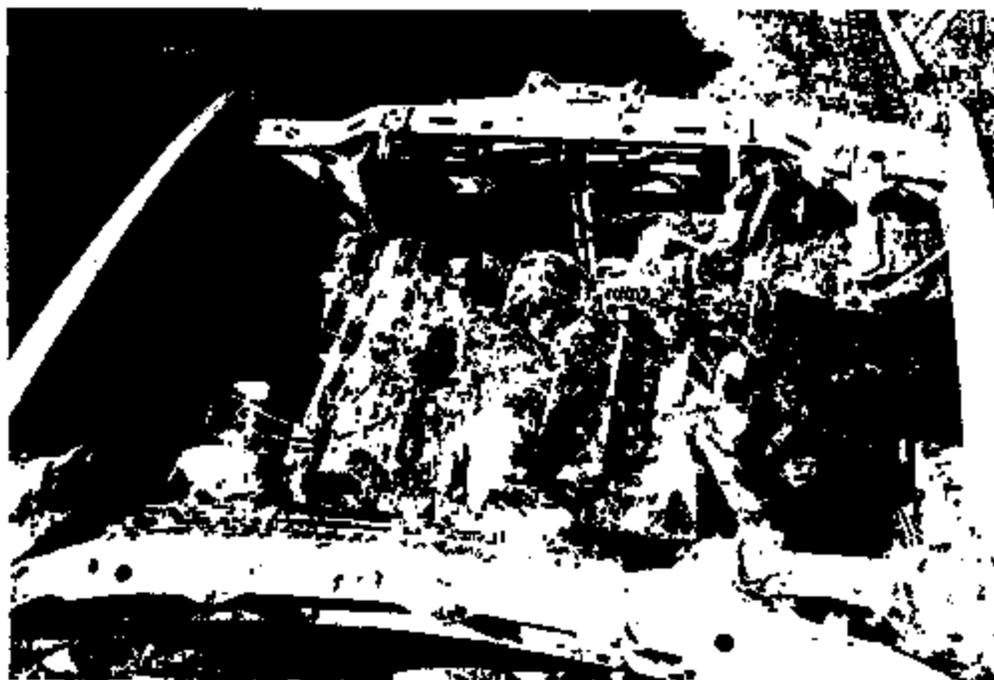


Photo #

12

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Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

13



Photo #

14

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

15



Photo #

16

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: CA00163

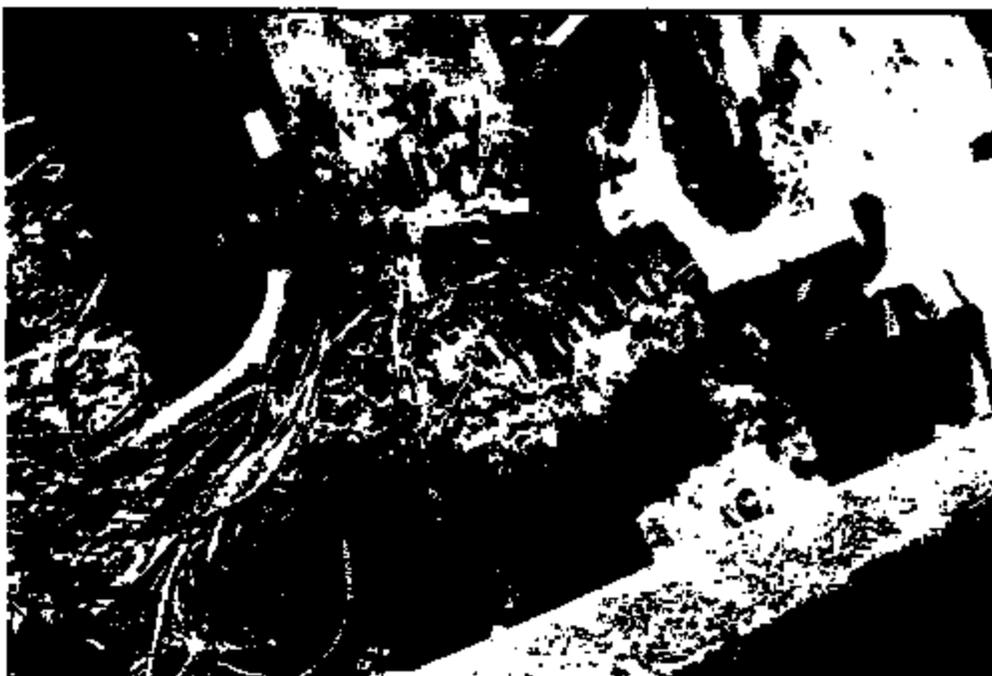


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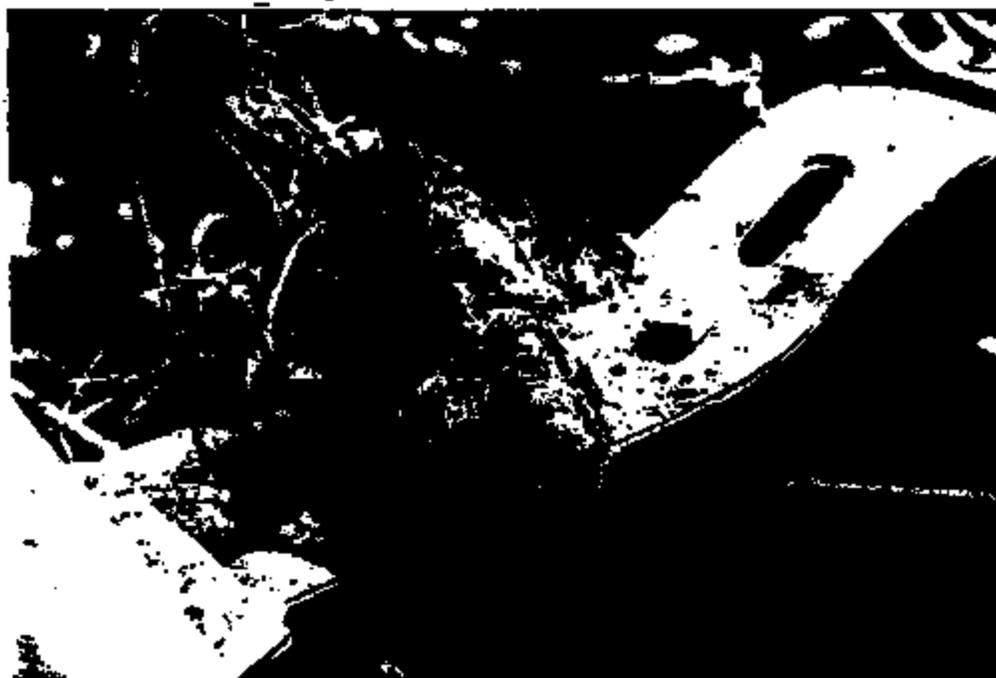


Photo #

18

EP82-025 30812

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

19



Photo #

20

Who supervised
this?

ER02-025 30013

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: 600167



Photo #

81



Photo #

82

ER02-025 30014

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

23



Photo #

24

EA02-020 30010

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA00163

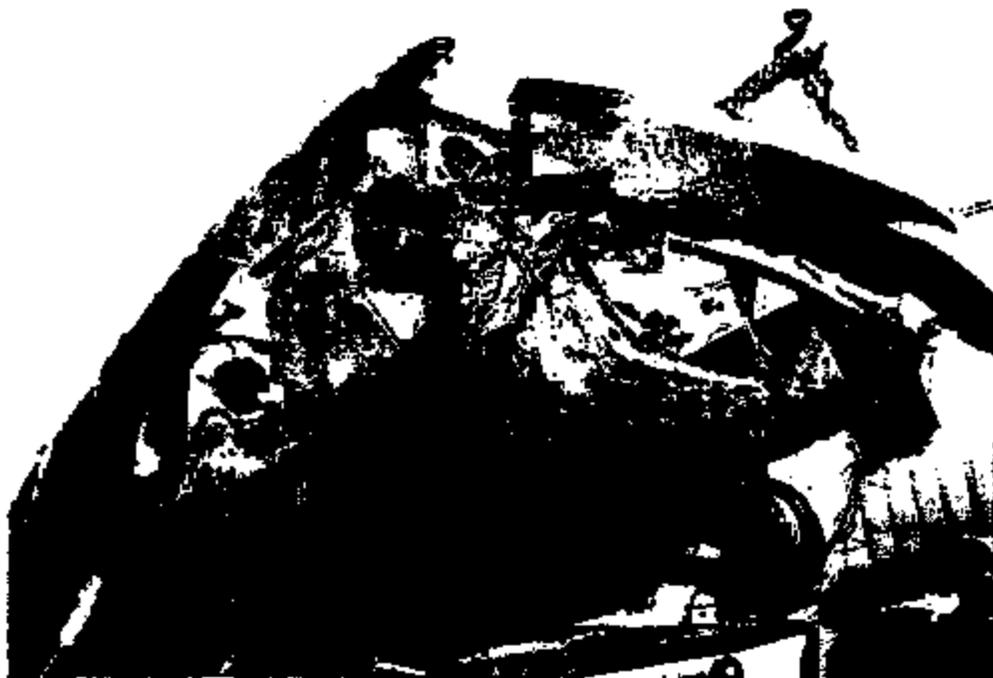


Photo #

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Photo #

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ERE2-825 30816

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA00163



Photo #

27



Photo #

28

8002-825 30017

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

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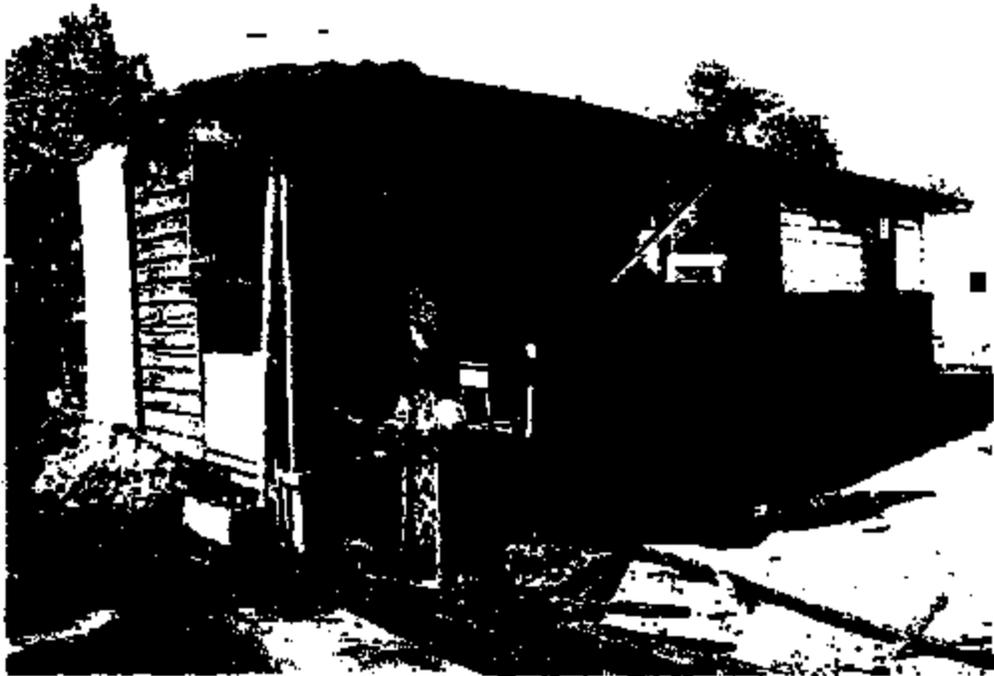


Photo #

29

COMPLETE WITH AS MUCH FACTUAL INFORMATION AS POSSIBLE AND MAIL IMMEDIATELY AFTER FIRST INSPECTION.

**PROPERTY INSURANCE
LOSS REGISTER**

1. Please type or print.
2. Use an extra form as necessary.
3. Where more than one form is required then number the pages and staple together.
4. You MUST keep a copy for your files.

**PAGE
NUMBER**

INSURED (if a business then enter full name of business)

[Redacted Name] [Redacted Address] [Redacted City] [Redacted State] [Redacted Zip]

current address [Redacted] [Redacted] [Redacted] [Redacted] [Redacted]
 previous address [Redacted] [Redacted] [Redacted] [Redacted] [Redacted]

LOCATION OF LOSS
 street (not "care" if insured's current address) [Redacted] [Redacted] [Redacted] [Redacted] [Redacted]
 city [Redacted] state [Redacted] zip [Redacted]
DATE OF LOSS
 day [Redacted] month [Redacted] year [Redacted]
 time of loss [Redacted]

INSURED BY (report ONLY those lines involved and only once)

Company <i>Columbia Mutual Ins Co</i>	policy no. <i>MO 121 815</i>	claim no.	rate & occupancy	combined rat
amount of policy <i>175,000</i>	deductible <i>23,650</i>	stock	<i>5%</i>	
total insurance if more than one policy <i>175,000</i>	<i>23,650</i>		<i>9.4%</i>	
replacement cost value <i>60,000</i>	<i>35,000</i>			
actual cash value <i>57,000</i>	<i>30,000</i>			
estimated loss <i>2,000</i>	<i>20,000</i>		<i>6,000</i>	

LOSS INFORMATION (check applicable boxes)

Known cause of loss *elect short a dist panel* was fire dept. report reviewed?

Fire Only dwelling mobile dwelling commercial industrial other (specify) _____
 check box if vacant check box if under construction insured's fire losses last five years: 0 1 2 3 4 5

Theft Only jewelry cash securities bonds stocks other (specify) _____
 office equipment cameras sports equipment tools VCR/VHS/tapes other Car Parts

OTHER PARTIES TO FIRE LOSS (if a business then enter full name of business)
 New Applicable Code: 1-Police, 2-Fire, 3-Insurance, 4-Corporate Officer, 5-Insurance Manager, 6-Public Adjuster, 7-Attorney, 8-Tax, 9-Contractor, 10-Risk Manager, 11-Other

name (last, first, middle initial) <i>Donovan</i>	title <i>Tony Glavin</i>	city <i>Little Rock</i>	state <i>Ark</i>	zip <i>72111</i>
name (last, first, middle initial) <i>G. L. PALER</i>	title <i>EXHIBIT NO.</i>	city	state	zip

ADJUSTER

Company or adjusting firm
Columbia Ins Group
10 Bay 618

by *Columbia* *MO 65203*
 telephone number *501-778-4529* name of adjuster *Richard H. Wells*

I certify that I provided the above information and to the best of my knowledge, information and belief, all of such information is accurate.

adjuster's signature *[Signature]* date of this report *10/13/85*
 month day year

Mail Form to: P.L.R. - P.O. Box 11

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
JONESBORO DIVISION

FILED

U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

NOV 04 1997

JAMES W. McCORMACK, CLERK
By: Middle DEP. CLERK
PLAINTIFFS

[REDACTED]

VS.

NO. J-C-97-421

FORD MOTOR COMPANY

This case assigned to District Judge Wright
and to Magistrate Judge Jones

DEFENDANT

COMPLAINT

Come the Plaintiffs, by and through their attorneys, Huckabay, Munson, Rowlett & Tilley, P.A., and for their cause of action against Ford Motor Company state:

1. [REDACTED] are residents of Paragould, Greene County, Arkansas.
2. Plaintiff [REDACTED] is a resident of Fort Smith, Sebastian County, Arkansas and owns a rental house located at [REDACTED] Paragould, Greene County, Arkansas.
3. Plaintiffs Allstate Insurance Company and Columbia Insurance Company are foreign corporations authorized to do business in Arkansas.
4. The Defendant, Ford Motor Company, is a foreign corporation authorized to do business in Arkansas with its registered agent for service being CT Corporation in Little Rock, Pulaski County, Arkansas.
5. The amount in controversy in this cause of action is in excess of federal jurisdictional units. Therefore, jurisdiction and venue are proper in this Court.

6. The vehicle which forms the basis of this suit is a 1994 Lincoln Towncar Signature four door sedan designed, manufactured, assembled and distributed by Ford Motor Company.

7. The incident which forms the basis of this suit occurred on or about October 6, 1995. The Lincoln Towncar mentioned above was owned by Plaintiff [REDACTED]

[REDACTED] On the day before the incident, [REDACTED] parked her Lincoln automobile in her carport at approximately 10:30 p.m. At approximately 8:30 a.m. on October 6, 1995, after being parked undisturbed in the Plaintiffs' carport all night, the Lincoln automobile burst into flames because of a malfunction in the vehicle's electrical system. The defective electrical system put this vehicle in a defective condition and unreasonably dangerous. The fire completely engulfed the Lincoln automobile and quickly spread to the [REDACTED] residence located at [REDACTED] [REDACTED] Paragould, Arkansas causing extensive fire and smoke damage.

8. Thereafter, the fire spread to the rental property owned by Plaintiff, [REDACTED] [REDACTED] Paragould, Arkansas and extensive fire and smoke damage occurred.

**COUNT I
STRICT LIABILITY**

9. At all times relevant to the Complaint, Ford Motor Company, was in the business of designing, manufacturing, or otherwise distributing automobiles. The Lincoln Towncar in question was designed, manufactured, and distributed by Ford Motor Company. Moreover, the Lincoln Towncar in question was a defective product and unreasonably dangerous at the time of the incident in question. The defective nature of the vehicle caused it to burst into flames without warning and was the proximate cause of injuries and damages suffered by the Plaintiffs.

COUNT II
NEGLIGENCE

10. Ford Motor Company was negligent in designing, manufacturing, distributing, marketing, instructing, and testing the Lincoln Towncar in question. These acts of negligence proximately caused and/or contributed to injuries and damages suffered by the Plaintiffs.

COUNT III
BREACH OF WARRANTY

11. At all times relevant to the complaint, Ford Motor Company was a "merchant" in the business of supplying "goods". The Lincoln Towncar involved in this case is and was a "good" and/or "product" sold for consumer usage. As such, the defendants breached the warranties of merchantability and fitness for a particular purpose in that the Lincoln Towncar was not fit for ordinary use or for the intended use for which it was purchased. These breaches of warranty proximately resulted in the accident, injuries and damages suffered by the Plaintiffs. Notice has been provided as required by law.

COUNT IV
DAMAGES

12. As a proximate result of the conduct of defendant and the defective Lincoln Towncar automobile, the Plaintiffs have been damaged by the incident in question. The Plaintiffs are seeking monetary damages from the defendants to compensate them for the following elements of damage:

- (1) [REDACTED] property damage to their home located at [REDACTED] Paragould Arkansas; damage to personal property owned by [REDACTED] other monetary expenses incurred during the repair of the residence listed above; and mental anguish and emotional harm to Plaintiff [REDACTED]

which culminated in her being admitted a facility for treatment of depression resulting from the loss and anxiety surrounding the fire in question; damage to Lincoln automobiles referenced herein;

- (2) [REDACTED] property damage to the home located at [REDACTED] street, Paragould, Arkansas; damage to personal property located in the home located [REDACTED] loss of rental income; other monetary expenses incurred during the repair of the residence listed above;
- (3) Columbia Insurance Company seeks damage for amount they have paid to [REDACTED] [REDACTED] pursuant to a policy of insurance covering the home located at [REDACTED] Paragould, Arkansas; and
- (4) Allstate Insurance Company seeks damage for monies paid to [REDACTED] [REDACTED] pursuant to a policy of insurance covering a home located at [REDACTED] [REDACTED] Paragould, Arkansas.

13. The Plaintiffs reserve the right to prove the amount of damages at trial. The amount of compensatory damages sought will be in excess of the amount sufficient to establish jurisdiction.

14. The Plaintiffs demand a trial by jury on all issues.

WHEREFORE, the Plaintiffs, [REDACTED] [REDACTED] pray that they have judgment of and against the defendant, Ford Motor Company, for attorneys fees, for their costs, and any and all other proper relief.

Respectfully submitted;

HUCKABAY, MUNSON, ROWLETT & TILLEY, P.A.
First Commercial Building
400 West Capitol Ave., Suite 1900
Little Rock, Arkansas 72201
(501) 374-6535

By:

John E Moore

JOHN E. MOORE, Bar No. 82111
BOB SEXTON, Bar No. 96106

CSOR0087

MOB II O.R. VIN Customer Selection

02/11/1998 16:35:12

VIN: 1LNLM82W0RY720247

Model: TOWN CAR

Model Year: 94

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

A	S	Acqd	Last Name	First Name	MI	Address	City	St	Zip
---	---	------	-----------	------------	----	---------	------	----	-----

F1=HELP F3=EXIT F7=FIRST F8=NEXT
1223 NO CUSTOMER DATABASE INFORMATION FOR THIS REQUEST

OGDB191

CSOR0021

MORS II Recall Inquiry

02/11/1998 16:35:19

VIN: 1LNLM82W0RY720247
Year: 94 Model: TOWN CAR

Build Date: 03/14/1994
WSD: 03/29/1994

Campaign Number	Campaign Type	1864 Description	Campaign Status	Status Date	Dealer Code
94S89	S	ADAPTER PLT.	COMPLETE	08/27/1994	45260
96L12	L	PASS AIR BAG	FORCED COMPLETION	01/22/1998	AUTOC

F3=EXIT
I002 REQUESTED INFORMATION DISPLAYED

OGDB191

0002-028 0007

CSUR0023

MOB II ESP Inquiry

02/11/1998 16:35:26

VIN: 1LVLMB2W0RY720247 Year: 94 Model: TOWN CAR

Contract Selling Dealer P&A Code: Name:

Contract Owner Street City Zip/PC

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

COVERAGE DESCRIPTION: NO ESP DATA

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

F3=EXIT F7-FIRST F8-NEXT
E222 NO ESP PLAN FOR THIS VEHICLE

OGDB191

5462-020 30024

CSOR0024

MOVS II CASIS Inquiry

02/11/98 16:35:32

VIN: 1LNLM82W0RY720247 Year: 94 Model: TOWN CAR

Name:

Calib: 41BJR00

Build Date: 03/14/1994

Recall Description

Axle: NOT AVAILABLE

WSD: 03/29/1994

NO RECALLS

Engine: 4.6L SOHC (MODULAR)

Trans: AODE 4 SPEED OD

ONP Count: 0

Message:

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

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

COVERAGE DESCRIPTION: NO ESP DATA

F3=EXIT

1002 REQUESTED INFORMATION DISPLAYED

OGDB191

8902-028 28022

SVMP510

NAVIS Vehicle Inquiry

02/11/98 16:34:16

```

=>
VEHICLE ID: 1LRV720247 (MNYFRRHHBB) Vin: 1LJLM82WORY720247 Div: 3 Status: 800
Vehicle Line: CVB Conv Deliv: 031694 Orig P-Lvl: 410 Selling Dir: 455741
Order Recpt: 021794 ShipTo Stat: Curr P-Lvl: 410 Sale Date: 032994
Orig Sched: 031494 Rls-To Stat: OK Order Dir: 45741 Demo Date:
Inv Prep: 030794 Orig Int St: 031594 Orig Rls Dir: 45741 Deliv Type: H
Prod Date: 031494 Carr Int St: 031594 Rls Dir P&A: 09627 Sales Prd: 094033
Rls Date: 031494 Dir-fin Ext: Warr Start: 032994 Cancel Sl:
Memo Consign: P&C Ext: 041094 Warrs-End: Sale Status: G
Orig Fltbus: 031494 Advert Ext: -Date- -Dealer-
Carr Fltbus: 031494 Slspan SSP: 1111 Shipped: 031594 88ND64
T/Name: 9 Curr Stock: 031494 455741
Addr: 1st-Prior:
City: OKLAHOMA CITY State: OK 2nd-Prior:
Zip: N/A-Rcpt: 032994 3rd-Prior:
V.O.: 1 2 3 4 5 6 7 8
12345234567890123456789012345678901234567890123456789012345678901234
MB2KY 3 5114C1180 HB F 3 P1 3P GL62 F K455741 OVADJ
8 9 0 1 2 3 4 5 6
567890123456789012345678901234567890123456789012345678901234567890
D6 8 WILNLD 8 D 2D A755A WP HZ001
FileHelp F3=Exit F4=Primary Menu F5=Financial Screen F9=Screen #3

```

OGDB191

1047-025 30030

HVMP570

NAVIS Financial Screen

02/11/98 16:34:29

VEHICLE ID: 1LRY720247 (NWYFBBBBD) Vin: 1LNLM82W0RY720247 Div: 3 Status: 800

Financial Data-----					
Orig Totl Inv:	31004.85	A-Plan Price:	.00	Predel Invoice:	.00
Curr Totl Inv:	31004.85	Total Adj:	.00	Sched-A GST:	.00
Base Vehicle:	29922.00	Base Adj:	.00	FOC GST:	.00
Options:	450.85	Option Adj:	.00	Price Protect:	.00
Base Holdback:	.00	Base Mb Adj:	.00	Chargebak Amt:	
Optn Holdback:	.00	Option Mb Adj:	.00	30-Day FP Amt:	.00
Misc Charges:	7.00	Gas Amt:	.00	Floor Plan:	90.43
Finance Charge:	.00	Sched-B Amt:	625.00	P&C Charge:	87.88
FD&F/LMFA:	.00	Mktng Contrib:	.00	Pre-Dlvry Amt:	.00

Financing Data-----					
Finance Source:	0000001	O-Warr Start:	032994	Release Date:	031494
Orig Int St-Sw:	N	Co Tag Number:		Transit Time:	4
Ret Draft Ind:		Pre-del Date:		Ris Plus Trans:	031894
Floor Plan Date:	041094	Prdlvry S.Code:		Ramp Code:	
Mvt Com Code:		Lease Code:		Method Shipped:	5
Upfront FP Ind:		Invoice In-Proc:	110194	Memo Coms Loc:	

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

OGDB191

16886 628-2848

NVMP530

NAVIS Inquiry Screen #3

02/11/98 16:34:32

-->

VEHICLE ID: 1LRY720247 (WVYPRBBB) Vin: 1LNLM82W0RY720247 Div: 3 Status: 800

Ordering Name: XXXXXXXXXX
Secondary Name:
Ordering FIN: HZ001
Order-For FIN:
Orig Order Type: 5

Selling FIN: HZ001
Sold-To Fin:

Distr Status: P
Last NAVIS St: 032994
Distr Stat Dt: 031694
Last Activity: 110294
Serialized Dte: 030294
Scheduled Dte: 031494
Mexico Status:

Component Data - - - - -

Dr Post/Calib: LLD Tire Brand: A
Kais Cntl Lbl: KBL KEC:
Engine Tag Cd: BGS12AA
Engine Serial:
Driver Airbag: FTAE2M18ATL
Passngr Airbag: 1H028B812 Axle: JY

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

OGDB191

ENC-028 20012

01DEC97
PAGE 2.01

1995 SE-II PARTS BY CONDITION CODE SUMMARY (11NOV97 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
WYCOFF FRANCES KLEBAR

PART NO	CD	COUNT
DZAG	08	2
1124	13	1
13466	08	1
15055	08	1
7052	08	1
7902	08	1
8620	56	1
98715	08	1

FORM 828 88004

01DEC57
PAGE 3.01

1955 SE-II PARTS BY CUSTOMER CONCERN CODE SUMMARY (11NOV57 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
WYCOFF FRANCIS KLEBER

PART NO	CCC	COUNT
D128	D31	1
D128	D37	1
1126	H09	1
13466	L25	1
15055	L25	1
7052	L72	1
7902	P17	1
8620	M82	1
97715	M82	2

FORM 300-200

01DEC97
PAGE 4.01

1995 ES-II PART/CONCERN CODE DESCRIPTION SUMMARY (11NOV97 C/O)
DATA ORDERED BY DESCRIBING REPAIR COUNT

NUMBER	PART DESCRIPTION	WPCOFF COUNT	FRANCKS ELABOR CD-DESCRIPTION	COUNT	CUSTOMER CONCERN CODE DESCRIPTION (CCC)	COUNT
DIAG	DIAGNOSIS	2	08-OTHER/UNKNOWN	7	L35-LIGHTS NOT WORKING-INTERIOR	2
1126	DRUM ASY-REAR BRAKE	1	19-OVF OF ROUND	1	M02-NOISE-UNDER HOOD/FRONT OF VEHICLE	2
13466	SMALL BULBS	1	56-NOISE/RATTLE/SH	1	D21-STALLS AFTER START-UP (IN PARK/NEUTR)	1
15055	SOCKET&WTR ASY CIG	1		1	D37-ENGINE LACKS POWER BUT RIMS SMOOTH	1
7052	OIL SEAL-TRANS REAR	1		1	M09-NOISE/SQUEAL/GRIND/GRIND (BRAKES)	1
7502	CONVERTER ASY	1		1	L72-TRANSMISSION/CLUTCH FLUID LEAKS	1
8620	BELT-W/DRUM PANSION	1		1	P17-SHIFTS TOO LATE/NO SHIFT (AUTO TRAN)	1
87715	VALVE-AIR BYPASS	1				

8000 020-2000

0106297 CLAIMS LISTING FOR 1995 MODEL WYCOFF
 PAGE 130000 BY PARTCOOH SERIALNO 011822

1180997 C/O REQUESTED BY:
 DATA SOURCE: PMS SR-II 123400

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

VEHICLE INFORMATION										REPAIR INFORMATION														
SERIAL NUMBER	CHASSIS	YEAR	MAKE	MODEL	PLANT	CLAIM NUMBER	WYCOFF NUMBER	C	WCC	PART NUMBER	CC	CCC	CD	REPAIR DATE	T	IS	TACT CODE	MILES	MATL. COST	TOTL. COST	LAB HRS	WYCOFF DEALR	ST	
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	279276	HTHNSL0	7007			13466	L25	08	08NOV95	5		E83	25075	0.83	9	0.2	06009	AR		
** COMMENTS-CLAIM #1 CCOM-DOME LIGHT DOES NOT WORK TECH-CX AND REPLACE DOME LIGHT																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	279449	YETI990	7001			15055	L25	08	18DEC95	10		E83	27793	5.27	22	0.4	06009	AR		
** COMMENTS-CLAIM #2 CCOM-ASH TRAY LIGHT DOES NOT WORK TECH-CX AND REPLACE SOCKET BULB AND SHIELD																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	280623	AF28650	2E43			97715	H02	08	18DEC96	19		E07	43060	31.80	56	0.3	06009	AR		
** COMMENTS-CLAIM #3 CCOM-NOISE UNDER HOOD TECH-TEST AND REPLACE VALVE AND TUBE																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	280623	AF28650	2G04			DING	E31	08	18DEC96	15		E04	43060	0.00	42	2.1	06009	AR		
** COMMENTS-CLAIM #4 CCOM-STALLS AFTER START UP TECH-RUNDS TEST AND REPROGRAM PROCESSOR AND RESET																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	281181	ILAND60	3A08			7902	F17	08	02DEC96	22		E04	48005	174.50	434	4.9	06009	AR		
** COMMENTS-CLAIM #5 CCOM-TRANS SHOOTERS AT SHIFTS TECH-R AND R TRANS AND REPLACE CONVERTER, FLUID, AMPLIFIER																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	281181	ILAND60	5705			1126	H09	13	02DEC96	22		E04	48005	0.00	126	3.0	06009	AR		
** COMMENTS-CLAIM #6 CCOM-BRAKES VIBRATE WHEN STOPPING TECH-TUNE PFT BOPERS AND RESET DRIVE																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	281181	ILAND60	2G04			DING	D07	08	02DEC96	22		E04	48005	0.00	19	0.5	06009	AR		
** COMMENTS-CLAIM #7 CCOM-LOW POWER TECH-CHCK TEST, CODE P1111																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	281315	TW5827A0	1G03			8620	H02	56	23DEC96	23		E04	48650	11.83	28	0.3	06009	AR		
** COMMENTS-CLAIM #8 CCOM-BELTS NOISY UNDER HOOD TECH-CHECK AND REPLACE WORN BELT																								
691328	LHC 4-S WAY WIX	14F8295	OLIMAR95	11495	281315	TW5827A0	3A06			7052	L72	04	23DEC96	23		E04	48650	4.67	26	0.5	06009	AR		
** COMMENTS-CLAIM #9 CCOM-TRANS LEAKING FLUID TECH-R AND R DRIVE SHAFT AND REPLACE BACK SEAL																								

THIS LISTING CONTAINED 9 TOTAL CLAIMS

DEALER

675 745 | VIN 1LNLM82W2SY691338

REGISTERED RETAIL PRICE

AMOUNT

BATCH-ID S498000007 D TO AA

PRICE LEVEL B1001DM82 VIN: 1LNLM82W2SY691338

REQUESTOR: ROBINSON

CASE: [REDACTED]

THIS INVOICE MAY NOT REPRESENT THE FINAL COST OF THE VEHICLE IN VIEW OF THE POSSIBILITY OF FUTURE RESALES, ALLOWANCES, DISCOUNTS AND INCENTIVE AWARDS FROM FORD MOTOR COMPANY TO THE DEALER.
* THE PORTION OF THE VEHICLE PRICE WILL BE PROVIDED TO THE APPROPRIATE FORD (LAW) TO SUPPORT NATIONAL DEALER ADVERTISING.

INVOICE TOTAL	SALES TAX	REGISTRATION	SALES	PLT	A PLAN

SOLD TO		ATTN: NVP 675745		FURTHER TERMS ON REVERSE SIDE	
OKLAHOMA CITY OK				Y2	PLT RLSE OTE
				51	02/14/95
SHIP TO (IF OTHER THAN ABOVE)		88069		OK	RC20
MEMPHIS				DATE BY MONTH	EST. NUMBER
MEMPHIS TN				02 03 95	67-5117 DC 15
		SHIP THROUGH			

INVOICE & UNIT IDENTIFICATION NO. 1LNLM82W2SY691338 FINAL ASSEMBLY POINT NIXON FINANCE COMPANY AMERICA BANK FORD MOTOR CREDIT 000001
 THIS INVOICE TO BE USED FOR THE BILLING OF VEHICLES ONLY DEALER COPY

EMD-423 3846

FINANCE - 200 - JMFCA 1/92

DEALER 675 745 VIN 1LNLM82H23Y691338

	DESCRIPTION	PRICE	AMOUNT
	1995 TOWN CAR SIGNATURE 4-DOOR	38500 00	33505 00
	SPCL. DLR. ACCT. ADJ. CR.		1880 00
	TOTAL BASE VEHICLE	38500 00	31955 00
DK	CHAMPAGNE CLEARCOAT METALL		
BC	CURRANT LEATHER ST SURFACE		
99H	.4.6L EFI V8 ENGINE	NC	NC
44U	ELECTRONIC AUTO O/D TRANS	NC	NC
73P	P218/70R18 NSW TIRES	NC	NC
B2C	MARCH DELIVERY MONTH		
153	FRONT LICENSE PLATE BRACKET	NC	NC
593	TRACTION ASSIST	218 00	184 00
592	FLEET DELETE PACKAGE - OPTION	NC	NC
	FLEET FUEL FILL DELETE	NC	10 15-
0	LEATHER SEATING SURFACE T/C	570 00	490 00
958	MONOTONE PAINT TREATMENT	NC	NC
	SPCL. DLR. ACCT. ADJ. CR.		2 00-
	TOTAL VEHICLE & OPTIONS	39285 00	32595 00
	DESTINATION & DELIVERY	625 00	625 00
	TOTAL FOR VEHICLE	39910 00	
	FLEET REPURCHASE PROGRAM		
	B66 - POTENTIALLY ELIGIBLE		
	FOR REPURCHASE.		
	NET INVOICE FLEET OPTION		7 00
	FLEET P.O. NUMBER 16820745		
	BATCH-ID 949800007 D TD AA		
	SCHEDULE-8 LEVEL 00000		
	PRICE LEVEL 510010MB2		
	SHIPPING HEIGHT 3894 LBS.		

VIN: 1LNLM82H23Y691338

THIS INVOICE MAY NOT REFLECT THE FINAL COST OF THE VEHICLE DUE TO THE POSSIBILITY OF FUTURE REBATES, ALLOWANCES, DISCOUNTS AND INCENTIVE AWARDS FROM FORD MOTOR COMPANY TO THE DEALER.
 * THIS PORTION OF THE VEHICLE PRICE WILL BE PROVIDED TO THE APPROPRIATE FMP (FMP) TO SUPPORT REGIONAL DEALER ADVERTISING.

REGIONAL ADVERTISING A	INVOICE TOTAL	SALES TAX	REGISTRATION	SALES	A PLAN
.00	33,227.85	.00		33,227.85	
.00	.00	640.85	7.00	.00	31955.00

BOLD TO: [REDACTED] ATTN: NVP 675745

OKLAHOMA CITY OK

SHIP TO (IF OTHER THAN ABOVE): [REDACTED] 88069

MEMPHIS TN

SHIP THROUGH:

FINANCE COMPANY AND/OR BANK: FORD MOTOR CREDIT

DEALER COPY

DATE OF PROMISE: 02 08 95

FORM NUMBER: 67-5117

FORM DATE: 02 13

PLT RLSE DTE: 02/14/95

RC20

51 **OK**

INVOICE & UNIT IDENTIFICATION NO: 1LNLM82H23Y691338

FINAL ASSEMBLY POINT: NIXOM

FINANCE COMPANY AND/OR BANK: FORD MOTOR CREDIT

DEALER COPY

825-825 38943

FINANCE - 250 - 4074 (02/95)

ENTER VIN => 1LN1MS2W28Y691338
 NAME => WYCOFF ZIP --> 724502815 MODEL YR -->
 OWNER NAME : [REDACTED]
 STREET ADDR : [REDACTED]
 CITY : PARAGOULD N/A DATE: 96-04-17
 ST/PRV: AR CTRY: ZIP/POSTAL CODE: [REDACTED] N/A SOURCE: P
 MODEL YEAR : 95 PLANT: Y SALE DATE: 95-03-01
 BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES PRODUCTION DATE: 95-02-14
 VEHICLE DESC : 1995 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	88	2	069	54	88
FACING	3	67	2	745		
RESPONSIBLE	3	22	2	688		

 CA EMISSION : 3 ENGINE TAG CODE : 5G612BA CAMPAIGN COUNTS
 NAVIS STATUS : 800 COMPANY CAR IND : TOTAL CAMPAIGNS : 01
 DSO DISTRICT : FLEET CODE : OPEN : 01 CLOSED : 00
 DSO NUMBER : FLEET STATUS : ACTIVE: 01 HISTORY: 00

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

LPENJ82

ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LHLM82W2SV691338 TYPE OF SEARCH: A
 MODEL YEAR: 95 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES
 NEW STATUS CODE: CAMP DIV : 6
 REPAIR INFORMATION: TYPE CODE: SUPP CODE :
 REPAIR DATE: DEALER P/A: KIT CODE : CK
 MICRO REF: CLAIM NUM: OASIS DATE :
 DELETE REASON: VENDOR N/A INFORMATION:
 RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 4
 CURRENT: 3 22 688 ASSIGNED: 96-12-13 SOURCE: PX EXTRACT DATE: 96-12-13
 ***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
 CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC
 M RELEASED FOR MAILING 97-02-07
 H AWAITING MAILING 96-11-24

DELETE REASON:
 F1-INQUIRY F2-G140 F3-EXIT F5-G130 F7-FIRST F8-NEXT F9-MORE STATUS
 F10-ADD STATUS F11-REVISE
 I037-NO MORE DATA TO DISPLAY LPENJ82

ENTER CAMPAIGN NBR ==> 96L12 VIN ==> 1LW1M82W2SY691338
 DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES
 RESP DEALER : 322688 BEGINNING MAILED DATE: 97-02-21
 RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-02-27
 CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
 LAST NAME : INITIALS: LS
 STREET ADDR1 : ST/PRV: AR
 ADDR2 :
 CITY : PARAGOULD CTRY:
 ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 96-04-17

RESP DEALER : BEGINNING MAILED DATE:
 RELEASE DESC : ENDING MAILED DATE :
 CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
 LAST NAME : INITIALS:
 STREET ADDR1 : ST/PRV:
 ADDR2 :
 CITY : CTRY:
 ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE:

F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140
 1048-LAST PAGE LPRNJ82

D1DEC97
PAGE 2.01

1995 SE-II PARTS BY CONDITION CODE SUMMARY (11NOV97 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FRANCES KLEBAR

PART NO	CD	COUNT
DIAG	08	2
1125	13	1
13466	08	1
15058	08	1
7052	08	1
7902	08	1
8620	36	1
9F715	08	1

FORM 528-2001

01DEC97
PAGE 3.01

1995 SE-II PARTS BY CUSTOMER CONCERN CODE SUMMARY (11NOV97 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FRANCIS KLEBAR

PART NO	CCC	COUNT
DIAG	D21	1
DIAG	D37	1
1126	H09	1
13466	L25	1
15055	L25	1
7052	L72	1
7902	P17	1
8620	R02	1
SE715	R02	1

8002-823 30048

01DEC97
PAGE 4.01

1995 SE-II PART/CONCERN CODE DESCRIPTION SUMMARY (L1NOV97 C/O)
DATA ORDERED BY DESCENDING REPAIR COUNT

NUMBER	PART DESCRIPTION	COUNT	FRANCIS KLEBAR CD-DESCRIPTION	COUNT	CUSTOMER CONCERN CODE DESCRIPTION (CCC)	COUNT
DIAG	DIAGNOSIS	2	08-OTHER/UNKNOWN	7	L25-LIGHTS NOT WORKING-INTERIOR	2
1126	DRUM ASY-REAR BRAKE	1	13-OUT OF ROUND	1	H02-NOISE-UNDER HOOD/FRONT OF VEHICLE	2
13466	SMALL BULBS	1	56-NOISE/RATTLE/SH	1	D21-STALLS AFTER START-UP (IN PARK/NEUTR)	1
15055	SOCKET/STARTER ANY CIG	1			D37-ENGINE LACKS POWER BUT RUNS SMOOTH	1
7052	OIL SEAL-TRANS REAR	1			H09-NOISE/SQUEAL/GRUNT/GRIND (BRAKES)	1
7902	CONVERTER ASY	1			L72-TRANSMISSION/CLUTCH FLUID LEAKS	1
8620	BELT-W/PUMP FAN/GEN	1			P17-SHIFTS TOO LATE/NO SHIFT (AUTO TRAN)	1
99715	VALVE-AIR BYPASS	1				

ENG-028 30000

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XXXXXXXX XXXXXX XXXXX XXXXX
XXXXXXXX XXXXXX XXXXX XXXXX
XX XX XX XX
XX XX XX XX
XXXXXXXX XXXXX XXXX XXXX
XXXXXXXX XXXXX XXXX XXXX
XX XX XX XX
XX XX XX XX
XXXXXXXX XXXXXX XXXXX XXXXX
XXXXXXXX XXXXXX XXXXX XXXXX

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XXXXXXXX XX XX XX XX XX XX XXXXXX XXXXXX XX XX
XX XX XX XXX XXX XXX XX XX XX XX XX
XX XX XX XX XXX XX XX XXX XX XX XX
XXXXXXXX XX XX XX XX XX XX XXXXXX XXXXXX XX
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XX XX XX XX XX XX XX XX XX XX XX
XX XX XX XX XX XX XX XX XX XX XX
XXXXXXXX XXXXXX XX XX XX XX XX XX
XXXXXXXX XXXXXX XX XX XX XX XX XX

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* CLAIMS LISTING FOR 1995 MODEL WYCOFF REQUESTED BY: FRANCIS KLEBAR 11NOV97 C/O*
* SORTED BY: PLATCODE SERIALNO MILES82 DATA SOURCE: PAMS SE-II *

* SUMMARY *

TOTALS					RATIOS							
CLAIMS	CLAIMS W/COMMENTS	CLAIMS IN TIS	VEHICLES	DEALERS	MATERIAL COST	TOTAL COST	CLAIMS PER VEHIC	CLAIMS PER DEALR	CLAIMS TOTL/SAMP	MATERIAL COST/REP	TOTAL COST/REP	PCT CLAIMS W/COMMENTS
9	9	9	1	1	\$229.00	\$752.38	9.00	9.00	1.00	\$25.44	\$83.60	100%

----- CLAIMS LISTING TITLE ABBREVIATIONS -----

SERIAL NUMBER	CAR LINE	B/S	STY	PLT	PROD DATE	MARK DATE	SELL DEALR	CLAIM NUMBER	MICRO NUMBER	C	WCC	PART MEMBER	CC	CCC	CD	REPR DATE	T IS	TACT CODE	MILES	MAIL COST	TOTL COST	LR HRS	REPR DEALR	ST
123456	RSC	30T	SWW	WAY	09NOV94	04FEB95	11111	123456	JHP34001		7P04	17A553	46	C05	46	236HP95	8*	806	10189	11.25	122	0.1	12345	MI

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

ENGINE CODES		TRANSMISSION CODES-->	
A = 2.0L-DOHC-PROBE	U = 3.0L	A = AX18 (AXOD)	
B = 2.5L-DOHC-PROBE	V = 4.6L-DOHC-RMD	C = ATX (4 SPD C04E)	
C = 5.0L-COBRA-R	W = 4.6L-DOHC	E = ATX (4 SPD-4 RAT)	
D = 5.0L-SHP COBRA	X = 4.6L-DOHC-FWD	N = ATX (3 SPD ASPIRE)	
H = 1.9L-DOHC	Y = 3.0L-DOHC-SHO	P = AODE (ELECTRONIC)	
J = 1.9L-DOHC	Z = 2.0L-DOHC-ZRTEC	R = MTK (5 SPD-MTK75)	
L = 2.5L-DOHC-DURATEC	1 = 3.0L-FLEX FUEL	W = MTK (M5-5 5 SPEED)	
P = 3.2L-DOHC-SHO	3 = 3.8L-FWD	Y = AX14 (AXOD)	
R = 3.8L-SUPERCHARGED	4 = 3.8L-RMD	2 = 5 SPEED (TS-MUSTANG)	
T = 5.0L-LOW PROFILE	8 = 1.8L-DOHC	4 = 4R70W (WIDE-RATIO)	
		5 = 5 SPEED (T-BIRD S.C)	
		6 = MTK 4 (5 SPEED)	
		7 = MTK (5 SPD ASPIRE)	

--> IF THIS ASTERISK APPEARS THEN CLAIM IS NOT USED IN TIS MATRIX.
(*CLAIMS IN TIS' TOTAL (IN SUMMARY ABOVE) EQUALS TOTAL CLAIM COUNT MINUS ASTERISK TIS CLAIMS)

1992-025 2081

**** 1995 MODEL YEAR PASSENGER CAR BODY DESCRIPTIONS ****				**** 1995 LIGHT TRUCK BODY DESCRIPTIONS ****			
VEHICLE	BODY DESCRIPTION			VEHICLE	BODY DESCRIPTION		
MUSTANG (MUS)	2-B	2 DOOR	BASE	CVR	CONVERT	BASE	
	2BA	2 DOOR	ALOCK BASE	CVA	CONVERT	ALOCK BASE	
	2GT	2 DOOR	GT	CGT	CONVERT	GT	
	2GA	2 DOOR	ALOCK GT	CGI	CONVERT	ALOCK INDY	
	2GC	2 DOOR	ALOCK COBRA	CGA	CONVERT	ALOCK GT	
PROBE	3-B	3 DOOR	BASE (PRB)	3GT	3 DOOR	GT	
ESCORT (ESC)	3-B	3 DOOR	BASE	TRACER (TRA)	4-B	4 DOOR	BASE
	3GT	3 DOOR	GT		4LT	4 DOOR	LTE
	W LX	STATION WAGON	LX		W-B	4 DOOR	BASE
	3 LX	3 DOOR	LX	ASPIRE (ASP)	3-L	3 DOOR	BASE
	4 LX	4 DOOR	LX		3SE	3 DOOR	SE
	5 LX	5 DOOR	LX		5-L	5 DOOR	BASE
CONTOUR (CTR)	4-G	2 DOOR	GL	MYSTIQUE (MYS)	4GS	2 DOOR	GS
	4 LX	4 DOOR	LX		4LS	4 DOOR	LS
	4SE	4 DOOR	SE		4GL	2 DOOR	ALOCK GS
	4GL	2 DOOR	ALOCK GL		4LL	4 DOOR	ALOCK LS
	4LL	4 DOOR	ALOCK LX				
	4SL	4 DOOR	ALOCK SE				
TABRUS (TAB)	4-P	4 DOOR	POLIC	SABRE (SAB)	4GS	4 DOOR	GS
	4PL	4 DOOR	ALOCK POLIC		4LS	4 DOOR	LS
	4SH	4 DOOR	ALOCK SBO		4GL	4 DOOR	ALOCK GS
	4-G	4 DOOR	GL		4LL	4 DOOR	ALOCK LS
	4 LX	4 DOOR	LX		WGS	STATION WAGON	GS
	4GL	4 DOOR	ALOCK GL		WLS	STATION WAGON	LS
	4LL	4 DOOR	ALOCK LX		WEL	ST WAGON	ALOCK GS
	N-G	STATION WAGON	GL		WLL	ST WAGON	ALOCK LS
	W LX	STATION WAGON	LX				
	WBL	ST WAGON	ALOCK BASE				
	WEL	ST WAGON	ALOCK GL				
	WLL	ST WAGON	ALOCK LX				
T-BIRD (TBN)	2LL	2 DOOR	ALOCK LX	COUGAR (CGR)	2XR	2 DOOR	XR7
	2LX	2 DOOR	LX		2XL	2 DOOR	ALOCK XR7
	2XC	2 DOOR	ALOCK SC				
FORD CROWN	4-P	4 DOOR	FLEET BASE		4PL	4 DOOR	ALOCK POLIC
VICTORIA (VTD)	4LX	4 DOOR	LX	MERCURY GRAND	4GS	4 DOOR	GS
	4FL	4 DOOR	ALOCK FLEET		4LS	4 DOOR	LS
	4BL	4 DOOR	ALOCK BASE	MARQUEE (MRC)	4GL	4 DOOR	ALOCK GS
	4LL	4 DOOR	ALOCK LX		4LL	4 DOOR	ALOCK LS
	4-P	4 DOOR	POLICE				
LINCOLN TOWN CAR (LNC)	4-L	4 DOOR	EXECUTIVE SIGNATURE	MARK VIII	2SC	2 DOOR	LSC
	4-S	4 DOOR	CARTIER	CONTRIL (CON)	4-L	4 DOOR	BASE
	4DC	4 DOOR					

**** 1995 LIGHT TRUCK BODY DESCRIPTIONS ****				**** 1995 LIGHT TRUCK BODY DESCRIPTIONS ****			
VEHICLE	BODY DESCRIPTION			VEHICLE	BODY DESCRIPTION		
F-SERIES	15P	150 L. DUTY	CONV.	358	350 H. DUTY	SUPR	
4X2 (FS2)	25P	250 L. DUTY	CONV.	35C	350 H. DUTY	CREW	
4X4 (FS4)	2HP	250 H. DUTY	CONV.	452	450 H. DUTY	CONV	
	35P	350 H. DUTY	CONV.				
	35S	350 H. DUTY	CONV.				
	158	150 L. DUTY	SUPR	BROWCO (BRO)	B-L	BASE	4X4
	25C	250 H. DUTY	CREW		BLT	XLT	4X4
	2HS	250 H. DUTY	SUPR		RES	KIDIE BAUER	4X4
VILLAGER (VIL)	VGS	GS WAGON		WINDSTAR (WIN)	WGL	GL WAGON	
	VLS	LS WAGON			W LX	LX WAGON	
	VAN	BASE VAN			VAN	BASE VAN	
RANGER	CON	CONV CAB		4X4 (RA4)	SUP	SUPR CAB	
4X2 (RA2)	CSF	CONV CAB SPLASH			SSP	SUPR CAB SPLASH	
EXPLORER	2-B	2 DR	BASE		4-B	4 DR	BASE
4X2 (EX2)	2XL	2 DR	XL		4XL	4 DR	XL
4X4 (EX4)	2XS	2 DR	XLSPT		4LT	4 DR	XLT
	2ES	2 DR	BAUER		4EB	4 DR	BAUER
					4PR	4 DR	PREM (LTD)
AEROSTAR	<--- REGULAR BODY --->			<--- EXTENDED BODY --->			
4X2 (AR2)	BWH	WINDOW WAGON	XLT		BWH	WINDOW WAGON	XLT
4X4 (AR4)	RCL	CARGO VAN	BASE				
***** 1995 ECONOMY/CLUB WAGON *****							
VEHICLE	BODY DESCRIPTION			BODY DESCRIPTION			
(ECM)	<--- ECONOMY --->			<--- CLUB WAGON --->			
	1HB	150 HINGED	DOOR BASE	1EM	150 HINGED	DOOR	CUST
	1HX	150 HINGED	DOOR XL	1EH	150 HINGED	DOOR	XLT
	2HB	250 HINGED	DOOR BASE	1HP	150 HINGED	DOOR	CHAT
	2HX	250 HINGED	DOOR XL	3HM	350 HINGED	DOOR	CUST
	25B	250 HINGED	DR SUPR BASE	3HE	350 HINGED	DOOR	XLT
	25X	250 HINGED	DR SUPR XL	3HP	350 HINGED	DOOR	CHAT
	3HB	350 HINGED	DOOR BASE	3HM	350 HINGED	DR SUPR	CUST
	3HX	350 HINGED	DOOR XL	3HE	350 HINGED	DR SUPR	XLT
	35B	350 HINGED	DR SUPR BASE	1SM	150 SLIDING	DOOR	CUST
	35X	350 HINGED	DR SUPR XL	1SH	150 SLIDING	DOOR	XLT
	36B	150 SLIDING	DOOR BASE	2SP	150 SLIDING	DOOR	CHAT
	18B	150 SLIDING	DOOR BASE	3SM	250 SLIDING	DOOR	CUST
	18X	150 SLIDING	DOOR XL	3HE	350 SLIDING	DOOR	XLT
	26B	250 SLIDING	DOOR BASE	3SP	350 SLIDING	DOOR	CHAT
	26X	250 SLIDING	DOOR XL				
	36C	250 SLIDING	DOOR XL				
	3CL	350 CUTAWAY	BASE				
	3CM	350 CUTAWAY	XL				
	2ST	250 STRIPPED	CHASSIS				
	3ST	350 STRIPPED	CHASSIS				

2000 528-2000

01DEC97 CLAIMS LISTING FOR 1995 MODEL WYCOFF
 PAGE 1 REPORTED BY PLATCODE SERIALNO NILESS2

11R0797 C/O REQUESTED BY:
 DATA SOURCE: PEMS SE-II X53400

VEHICLE INFORMATION						REPAIR INFORMATION																				
SERIAL NUMBER	CAR LINE	B/S	HTS	PLT	PROD	YEAR	SEAL	CLAIM NUMBER	MICRO NUMBER	C	WCC	PART NUMBER	CC	CCC	CD	REPR DATE	T	TACT	MILES	MATL. COST	TOTL COST	LAB HRS	REPR	ST		
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	279276	HTRECSL0	7D07	13466		L25	08	06NOV95	9	E93	25075	0.83	9	0.2	06009	AR			
** COMMENTS-CLAIM #1																										
CCOM-DOME LIGHT DOES NOT WORK																										
TECH-CK AND REPLACE DOME LIGHT																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	279449	YS7TRESM0	7W01	15055		L25	08	18DEC95	10	E83	27793	5.37	22	0.4	06009	AR			
** COMMENTS-CLAIM #2																										
CCOM-ASH TRAY LIGHT DOES NOT WORK																										
TECH-CK AND REPLACE SOCKET BULB AND SHIELD																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	280623	AE7SG6J0	2E03	9F715		W02	08	18SEP96	19	S07	43060	31.80	56	0.3	06009	AR			
** COMMENTS-CLAIM #3																										
CCOM-NOISE UNDER HOOD																										
TECH-TEST AND REPLACE VALVE AND TUBE																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	280623	AE7SG6J0	2G04	DIAG		D21	08	18SEP96	19	E84	43060	0.00	42	1.1	06009	AR			
** COMMENTS-CLAIM #4																										
CCOM-STALLS AFTER START UP																										
TECH-SEDS TEST AND REPROGRAM PROCESSOR AND RESET																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	281181	LLSNDGMC	3A08	7902		P17	08	02DEC96	22	E84	48005	174.50	434	8.9	06009	AR			
** COMMENTS-CLAIM #5																										
CCOM-TRANS SHIFTERS AT SHIFTS																										
TECH-R AND R TRANS AND REPLACE CONVERTER, FLUID, AND FILTER																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	281181	LLSNDGMC	5Y05	1126		H09	13	02DEC96	22	E84	48005	0.00	116	3.0	06009	AR			
** COMMENTS-CLAIM #6																										
CCOM-BRAKES VIBRATE WHEN STOPPING																										
TECH-TURN FRT ROTORS AND RESET DRIVE																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	281181	LLSNDGMC	2G04	DIAG		D37	08	02DEC96	22	E84	48005	0.00	19	0.5	06009	AR			
** COMMENTS-CLAIM #7																										
CCOM-LOW POWER																										
TECH-SEDS TEST, CODE P1111																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	281315	TN58A7A0	1G03	8620		W02	56	23DEC96	23	E84	49650	11.83	28	0.3	06009	AR			
** COMMENTS-CLAIM #8																										
CCOM-BELTS NOISY UNDER HOOD																										
TECH-CHECK AND REPLACE WORM BELT																										
691338	LNC	4-S	W4Y	WIX	14FEB95	01MAR95	11495	281315	TN58A7A0	3A05	7052		L72	08	23DEC96	23	E84	49650	4.67	26	0.5	06009	AR			
** COMMENTS-CLAIM #9																										
CCOM-TRANS LEAKING FLUID																										
TECH-R AND R DRIVE SHAFT AND REPLACE BACK SEAL																										

THIS LISTING CONTAINED 9 TOTAL CLAIMS

8002-828 30003

CSOR0087

MOVS II O.R. VIN Customer Selection

12/01/1997 10:05:32

VIN: 1LNLM82W2SY691338

Model: TOWN CAR

Model Year: 95

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

A	S	Acqd	Last Name	First Name	MI	Address	City	St	Zip
---	---	------	-----------	------------	----	---------	------	----	-----

F1=HELP F3=EXIT F7=FIRST F8=NEXT
1223 NO CUSTOMER DATABASE INFORMATION FOR THIS REQUEST

OGDB191

FORM 820-0004

CSOR0021

MORS II Recall Inquiry

12/01/1997 10:05:55

VIN: 1LNLM82W2SY691338
Year: 95 Model: TOWN CAR

Build Date: 02/14/1995
WSD: 03/01/1995

Campaign Number	Campaign Type	1864 Description	Campaign Status	Status Date	Dealer Code
96L12	L	PASS AIR BAG	RELEASED FOR MAILING	02/07/1997	322688

F3=EXIT
I002 REQUESTED INFORMATION DISPLAYED

OGDS191

CSOR0024

MORS II OASIS Inquiry

12/01/97 10:06:04

VIN: 1LNLM82W28Y691338 Year: 95 Model: TOWN CAR
Name:

			Recall Description
Calib:	518JR13	Build Date:	02/14/1995
Axle:	NOT AVAILABLE	MSD:	03/01/1995
Engine:	4.6L SOHC (MODULAR)		NO RECALLS
Trans:	AUTOMATIC OVERDRIVE	GNP Count:	0

Message:

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

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

COVERAGE DESCRIPTION: NO ESP DATA

F3=EXIT

1002 REQUESTED INFORMATION DISPLAYED

OGDB191

8802-421 30000

CSOR0087

MORS II O.R. VIN Customer Selection

12/01/1997 10:05:32

VIN: 1LNLM82W2SY691338

Model: TOWN CAR

Model Year: 95

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

A	S	Acqd	Last Name	First Name	MI	Address	City	St	Zip
---	---	------	-----------	------------	----	---------	------	----	-----

F1=HELP F3=EXIT F7=FIRST F8=NEXT
I223 NO CUSTOMER DATABASE INFORMATION FOR THIS REQUEST

OGDB191

EMC-025 2007

CSOR0021

NEWS II Recall Inquiry

12/01/1997 10:05:55

VIN: 1LNLM82W2SY691338
Year: 95 Model: TOWN CAR

Build Date: 02/14/1995
WSD: 03/01/1995

Campaign Number	Campaign Type	1864 Description	Campaign Status	Status Date	Dealer Code
96L12	L	PASS AIR BAG	RELEASED FOR MAILING	02/07/1997	322688

F3=EXIT
ID02 REQUESTED INFORMATION DISPLAYED

OGDB191

CSOR0024

MOSES II OASIS Inquiry

12/01/97 10:06:04

VIN: 1LNLM82W2SY691338 Year: 95 Model: TOWN CAR
Name:

Calib:	51BJR13	Build Date:	02/14/1995	Recall Description
Axle:	NOT AVAILABLE	WSD:	03/01/1995	NO RECALLS
Engine:	4.6L SOHC (MODULAR)			
Trans:	AUTOMATIC OVERDRIVE	ONP Count:	0	

Message:

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

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

COVERAGE DESCRIPTION: NO ESP DATA

F3=EXIT

1002 REQUESTED INFORMATION DISPLAYED

OGDB191

Date 7/26, 1994 **VEHICLE ACCIDENT REPORT** Our File No: 9485463-H

Name of Owner/Driver _____
Home address _____ Olin Branch MS _____
Business Address _____ Olin Branch MS _____
Business Phone _____ Home Phone _____

Name of Your Insurance Co.: Allstate policy # 0-45-031789
Type of Insurance Carried: _____
Driver of Your Car _____ Address _____ Phone _____
Relationship of Driver to Owner/Str _____ Driver's Age _____ License Number _____ Purpose of Use of Auto _____

Date of Accident 7/22/94, 1994 Time 5:50 pm
Where? (No and Street) _____ City-State _____
Where Police Investigated? N No? Fibers, IN Tom mearns

Name	PERSON INJURED	Address	Age	Relation to owner	Occupant of		Pedestrian
					your car	other car	
	<u>NONE</u>						

Nature of Injuries N/A
Where Injured Taken N/A Name of Doctor giving aid N/A

DAMAGE TO PROPERTY OF OTHERS

Extent of Damage Front of car - grill bumper headlights
If Auto Yr/Make of 1987 Buick Int. State and Plate No _____ License No _____ Driver's Age _____
Owner's Name _____ Address _____ Phone _____
Driver's Name John Lee Address at above Phone _____
Where was Property Seized? _____

WITNESSES (include and indicate occupants of Cars)

Name	Address	Phone	Occupant of		Pedestrian
			your car	other car	

BE SURE TO GIVE INFO CALLED FOR ON OTHER SIDE OF REPORT (over)

DAMAGE TO YOUR CAR

Parts Damaged	Extent of Damage	Estimated Loss

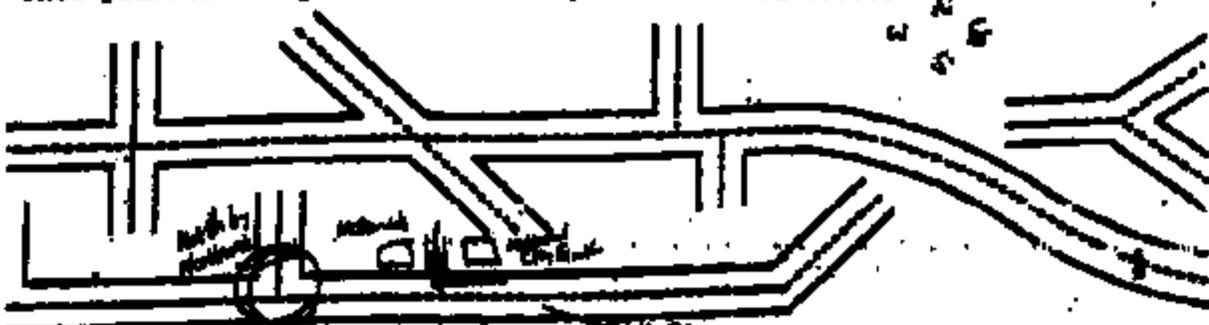
Name of Party Causing Damage _____ Address _____
 Where My Car Was Seen? _____

DESCRIPTION OF ACCIDENT

Weather at time of accident: Sunny + clear Road condition dry/clear
 Direction of your car: West What side of street? right Rate of Speed 20-25 mph
 If object collided with what side of street? South Rate of Speed unknown
 What Traffic Signals or Controls Violated? none by whom? none

SHOW HOW ACCIDENT HAPPENED ON ONE OF THESE DIAGRAMS

Identify each car and direction by numbered arrow, thus: <1. Show each car's position at the moment when crash happened. Show direction and distance each car traveled before the crash by solid line, thus: ———>. Show direction and distance traveled after crash by dotted line: >-----. Show pedestrians by small circles: o, railroads by *|||||*



DRIVER'S ACCOUNT OF ACCIDENT: I was west bound on 96th St. 200 ft out of intersection of North by Northwest. [redacted] was in an east bound lane of shopping center located between a McDonald's Restaurant and Federal City Bank. As I drove past the entrance to the bank of Federal City Bank, [redacted] attempted to cross west bound 96th St. traffic then turning left to proceed east bound on 96th St. Mr. Aurali claimed he did not see the car [redacted] was driving. He attempted to [redacted] traffic broadside the rental car [redacted] was driving.

Do you think you were to blame? No
 Owner's Signature _____ Driver's Signature [redacted]
 Today's Date 7/16/98

INDIANA OFFICIAL'S STANDARD CRASH REPORT
CASE 44-06-2-7189
Motor Vehicle Dept. Form 3600-1000-0000
100 North Senate Avenue, Indianapolis, IN 46204

OVERVIEW
POLICE

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DATE AND TIME 7/6/88 5:50 PM
LOCATION Hamilton, Indiana
OFFICER'S NAME [Redacted]

PLATE NO. [Redacted]
VEHICLE TYPE [Redacted]

STREET ADDRESS 9214 Street
CITY AND STATE [Redacted]

DIRECTION OF TRAVEL East North West

VEHICLE 1 [Redacted]

VEHICLE 2 [Redacted]

VEHICLE 3 [Redacted]

VEHICLE 4 [Redacted]

VEHICLE 5 [Redacted]

VEHICLE 6 [Redacted]

DRIVER OF VEHICLE 1 (as listed above)
DRIVER OF VEHICLE 2 (as listed above)

FROM: MIT TO: SCAR
 VEHICLE: DOWD, PHIL
 TO: REAR
 9th Street

The vehicle was shown leaving with intent to leave
 left side road 9th St. The stated traffic was 9th
 Street so the car left 9th St. a vehicle from the center
 left on 9th St. the stated he pulled left for excessive traffic
 and then went to the stated to the rear of the vehicle. At that
 time he stated that the vehicle was going 9th St. on the
 far right lane. He stated he did not see the vehicle.
 The stated he was (MIT) 9th St. on the far right lane
 when he pulled out of the center lane for the right lane
 and pulled into the middle of the vehicle. He stated he had
 to avoid the collision but could not.

BY: State Farm	DATE: 5/1	BY: All State
NAME OF INSURED: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF DRIVER: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF POLICE: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF AGENT: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF AGENT: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF AGENT: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF AGENT: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF AGENT: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State
NAME OF AGENT: State Farm	ADDRESS: 51	LOCATION OF VEHICLE: All State

STATE - AR

FIRE DEPT - PARAGOULD

INCIDENT REPORT

FBID	INCIDENT NUMBER	ESP. NO.	DATE	DAY	ALARM TIME	ARRIVAL TIME	TIME IN SERVICE
08300	000151		10/07/95	7	09:01	09:04	12:20
B. TYPE OF SITUATION FOUND			TYPE OF ACTION TAKEN			MUTUAL AID	
STRUCTURE FIRE * 11			EXTINGUISHMENT			* 1 - N/A	
C. FINED PROPERTY USE			IGNITION FACTOR				
DWELLINGS/1-2 FAMILY * 411			IGNITION-FACT UNKNOWN * 00				
D. CORRECT ADDRESS			ZIP CODE			CENSUS TRACT	
[REDACTED]			[REDACTED]				
E. OCCUPANT NAME			TELEPHONE			ROOM OR APT.	
[REDACTED]			[REDACTED]				
F. OWNER NAME			ADDRESS			TELEPHONE	
[REDACTED]			[REDACTED]			[REDACTED]	
G. METHOD OF ALARM FROM PUBLIC TELEPHONE TIE-LINE * 7		CO. INSP. 001	DISTRICT	SHIFT C	NO. ALARMS 1		
H. # FIRE SER. PERS RESP 11	# ENGINES RESP 2	# AERIAL APP RESP 1	# OTHER VEH RESP 0				
I. NUMBER OF INJURIES				NUMBER OF FATALITIES			
FIRE SERVICE * 0		OTHER * 0	FIRE SERVICE * 0		OTHER * 0		
J. COMPLEX DWELLING COMPLEX * 41			MOBILE PROPERTY TYPE NOT APPLICABLE * 00				
K. AREA OF FIRE ORIGIN GARAGE/CARPORT/STORAGE * 47			EQUIPMENT INVOLVED IN IGNITION EQUIP-INVOLVED UNKNOWN * 00				
L. FORM OF HEAT IGNITION		TYPE MATERIAL IGNITED	FORM MATERIAL IGNITED				
FORM-HEAT-IGN UNKNOWN * 00		SAWN WOOD	* 43 STRUCTURAL MEMBER		* 17		
M. METHOD OF EXTINGUISHMENT			LEVEL OF FIRE		ESTIMATE		
HAND-LAID HOSE HYDRANT * 7			GRADE LEVEL		* 1		

BNC2-025 30885

NUMBER OF STORIES
1 STORY

CONSTRUCTION TYPE
PROTECTED WOOD FRAME

Q. EXTENT OF FLAME DAMAGE
EXTEND BEYOND BLDG * 7

EXTENT OF SMOKE
CONFINED BLDG * 2

P. DETECTOR PERFORMANCE
UNKNOWN * 0

SPRINKLER PERFORMANCE
NO EQUIP. PRESENT * 3

Q. TYPE MATERIAL GENERATING MOST SMOKE
ASPHALT TREATED MAT * 86

AVENUE SMOKE TRAVEL
OPENING IN CONSTRUCTION * 5

R. FORM OF MATERIAL GENERATING MOST SMOKE
ROOF COVERING * 11

YEAR	MAKE	MODEL	SERIAL NO.	LICENSE NO.
S.				
T.				

60
61
62

REMARKS: 25-100 65 DACUS LADDER 101 TOWER 100 IN
 100 IN CLIMB TO HAVE HERD IN 100 IN
 OF FIRE. CAR UNDER GARPORT TOTAL

OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT)

DATE

MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)

DATE

STATE - AR

FIRE DEPT - GARFIELD

INCIDENT EXP. ALARM ARRIVAL TIME IN
 NOID NUMBER DATE DAY TIME TIME SERVICE

28366 000151 10/27/95 7 09:01 09:14 12:26

B. TYPE OF SITUATION FOUND TYPE OF ACTION TAKEN MUTUAL AID
 STRUCTURE FIRE * 11 EXTINGUISHMENT * 1 - N/A

C. FIXED PROPERTY USE IGNITION FACTOR
 DWELLINGS/1-2 FAMILY * 411 PROPERTY TOO CLOSE * 65

D. ZIP CODE ADDRESS ZIP CODE

E. OCCUPANT NAME TELEPHONE ROOM OR APT.

F. OWNER NAME ADDRESS TELEPHONE

G. ALARM FROM PUBLIC CD. INSP. DISTRICT SHIFT NO. ALARMS
 TELEPHONE TIE-LINE * 7 001 C 1

H. # FIRE SER. PERS RESP # ENGINES RESP # AERIAL APP RESP # OTHER VEH RESP
 11 2 1 0

I. NUMBER OF INJURIES NUMBER OF FATALITIES
 FIRE SERVICE 0 OTHER 0 FIRE SERVICE 0 OTHER 0

J. COMPLEX MOBILE PROPERTY TYPE
 DWELLING COMPLEX * 41 NOT APPLICABLE * 00

K. AREA OF FIRE ORIGIN EQUIPMENT IGNITION
 EXTERIOR WALL SURFACE * 76 EQUIP-INVO * 00

L. FORM OF MATERIAL IGNITED TYPE MATERIAL IGNITED FORM MATERIAL IGNITED
 DIRECT FLAME CONTACT WITH SPAN WOOD * 60 F. TEXTILE TRIM * 40

M. METHOD OF EXTINGUISHMENT LEVEL OF FIRE ORIGIN ESTIMATED LOSS
 HAND-APPLIED FIRE HYDRANT * 7 10 - 19 FT ABOVE * 2 \$15,000

NUMBER OF STORIES
1 STORY

CONSTRUCTION TYPE
UNPROTECTED WOOD FRAME

G. EXTENT OF FLAME DAMAGE
CONFINED ROOM OF ORIGIN * 3

EXTENT OF SMOKE DAMAGE
CONFINED BLDG ORIGIN * 6

F. DETECTOR PERFORMANCE
UNKNOWN * 0

SPRINKLER PERFORMANCE
NO EQUIP PRESENT * 8

D. TYPE MATERIAL GENERATING MOST SMOKE
SAWN WOOD * 63

AVENUE SMOKE TRAVEL
OPENING IN CONSTRUCTION * 5

B. FORM OF MATERIAL GENERATING MOST SMOKE
EXTERIOR TRIM * 13

YEAR MAKE

MODEL

SERIAL NO.

LICENCE NO.

B.
T.

ADDRESS: 101-107
POLICE STATION

ADDER IN: 101-107
CAPT. R.

ENGINE 102- KEDDICK
10-16-75

.60
61

OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT)

DATE

MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)

DATE

ENTER VIN ==> 1LN1MS2W0RY720247

NAME ==> [REDACTED] ZIP ==> [REDACTED] MODEL YR ==>

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

CITY : PARAGOULD N/A DATE: 95-04-25

ST/PRV: AR CTRY: ZIP/POSTAL CODE: 724502815 N/A SOURCE: P

MODEL YEAR : 94 PLANT: Y SALE DATE: 94-03-29

BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES PRODUCTION DATE: 94-03-14

VEHICLE DESC : 1994 TOWN CAR

	DIVISION	DISTRICT	SOME	DEALER	PDC CODE	PCSD REGION
SHIP-TO	3	88	4	064	46	88
FACING	3	45	2	741		
RESPONSIBLE	1	23	2	606		

CA EMISSION : 3 ENGINE TAG CODE : EG812AA

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

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

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

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

LPENJ82

ENTER CAMPAIGN NUMBER--> 94889 VIN--> 1LN1MB2W0RY720247 TYPE OF SEARCH: A
 MODEL YEAR: 94 DEFECT: ADAPTER FLT. BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES
 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: 4
 CURRENT: 1 23 606 ASSIGNED: 96-12-18 SOURCE: PK EXTRACT DATE: 96-12-18
 ***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE	DESCRIPTION	DATE	TYPE	DATE	P/A	CLAIM#	MICRO#	CL	SRC
C	COMPLETE	94-09-09	B	94-08-27	45260	250037	2KC6001	AC	
M	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
 I037-NO MORE DATA TO DISPLAY

LPEN182

KMPER CAMPAIGN NBR => 94889 VIN => 1LNLM82W0RY720247
DEFECT : ADAPTER PWT. BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES
RESP DEALER : 388064 BEGINNING MAILED DATE: 94-09-09
RELEASE DESC : NEW ISSUE TOTAL ENDING MAILED DATE : 94-09-09
CAMPAIGN DIV : 6 FLEET CODE: H2001 FLEET MGMT LOC CODE: 2504
LAST NAME : 1502 INITIALS:
STREET ADDR1 : ST/PRV: IN
ADDR2 : CTRY:
CITY : INDIANAPOLIS N-A SOURCE: F N-A EFF DATE: 94-06-15
EIP/POSTAL CODE: *****
RESP DEALER : BEGINNING MAILED DATE:
RELEASE DESC : ENDING MAILED DATE :
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 : ST/PRV:
ADDR2 : CTRY:
CITY : N-A SOURCE: N-A EFF DATE:
F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140
I048-LAST PAGE LPENJ82

ENTER CAMPAIGN NUMBER=> 96112 VIN=> 1LNLM82W0RY720247 TYPE OF SEARCH: A
 MODEL YEAR: 94 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES
 NEW STATUS CODE: CAMP DIV : 6
 REPAIR INFORMATION: TYPE CODE: SUPP CODE :
 REPAIR DATE: DEALER P/A: KIT CODE : CJ
 MICRO REF: CLAIM NUM: OASIS DATE :
 DELETE REASON: VENDOR N/A INFORMATION:
 RESP DEALER INFORMATION: NEW: IND: MATCH CODE: 4
 CURRENT: 1 23 606 ASSIGNED: 96-12-18 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 AUTOC 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
 I037-NO MORE DATA TO DISPLAY LPENJ82

ENTER CAMPAIGN NBR => 96112 VIN => 1LNLM82W0RY720247
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DOOR SEDAN SIGNATURE SERIES
RESP DEALER : 123606 BEGINNING MAILED DATE: 97-03-08
RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-03-20
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS: LS
STREET ADDR1 : ST/PRV: AR
ADDR2 : CITY : PARAGOULD CTRY:
ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 95-04-25

RESP DEALER : BEGINNING MAILED DATE:
RELEASE DESC : ENDING MAILED DATE :
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 : ST/PRV:
ADDR2 : CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE:
F1-INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140
1048-LAST PAGE LPENJ62

Date: 2-11-98

*RCVD.
2-12*

OWNER NOTIFICATION & RECALL

Jack Malffolen
Room 200
FOC II
FAX: 51624

Please forward duplicate invoice with the second copy of this form to:

REQUESTER: KLEABUR

QIGIC

31010 PITW

DEARBORN, MI 48126

TELEPHONE: (313)

FACSIMILE: (313) 845-3686

CASE NAME: [REDACTED]

VIN: 1L1NH1M18121W01R1471210121471

* (If this 11th Digit is a V AND model year: '87 or later, send Request for Factory Invoice to: Paul Lynn, Accounts Receivable, Kentucky Truck Plant. Phone (502) 429-2396 Fax (502) 429-2969

YEAR AND MODEL: 94 Town Car

CITY AND STATE: OK 73120

Please coordinate this request with the assembly plants and have copies submitted directly by the plant to the OGC II:

- 1. Reported damage or repairs occurred prior to delivery of this unit.
- 2. If vehicle was field diverted, please provide all releases.
- 3. Other than current sold-to dealer.

127898
PAGE 2.01

1994 SE-II PARTS BY CONDITION CODE SUMMARY (13JAN98 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FRANCIS KLEBER

PART NO	CD	COUNT
138021	08	1
713208	46	1
98308	58	1
98308	56	1

FORM-825 3/8/78

13JAN98
PAGE 3.01

PART NO	CCC	COUNT
13N021	A99	1
713200	L21	1
SH308	B41	1
	N02	1

1984 SE-II PARTS BY CUSTOMER CONCERN CODE SUMMARY (13JAN98 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FRANCIS KLEBIEH

FORM 808 28877

12FEN94
PAGE 4.01

1994 SE-II PART/CONCERN CODE DESCRIPTION SUMMARY (13JAN98 C/O)
DATA ORDERED BY DESCENDING REPAIR COUNT

NUMBER	PART DESCRIPTION	COUNT	FRANCIS KLEBER CD-DESCRIPTION	COUNT	CUSTOMER CONCERN CODE DESCRIPTION (CCG)	COUNT
13N021	AMBRO HD/LAMP CAPSUL	1	OR	1	A99-ADMINISTRATIVE (PARTS RETURN, MISBLT)	1
713268	SCUFF PLATE-DOOR	1	46-BURNED OUT	1	B41-APPEARANCE/FIT (BODY TRIM)	1
92108	TURB ASSY AIR VACVB	1	56-NOISE/RATTLE/SC	1	L21-APPEARANCE/ATTACHMENT (LIGHTING SYS)	1
		1	58-ASP BROKEN	1	N02-NOISE-UNDER HOOD/FRONT OF VEHICLE	1

FRANCIS KLEBER

***** 1993 MODEL YEAR PASSENGER CAR BODY DESCRIPTIONS *****			
VEHICLE	BODY DESCRIPTION	VEHICLE	BODY DESCRIPTION
MUSTANG (MOS)	2LK 2 DOOR STEERD LX 2CS 2 DOOR CONV GT 2CL 2 DOOR CONV LX	3LK 3 DOOR LX 3GT 3 DOOR GT 3GC 3 DOOR GT-CORRA	
PROBE (PRB)	3-B 3 DOOR BASH 3PT 3 DOOR GT	CAPRI (CAP)	2-B 2 DOOR CONV BASH 2XR 2 DOOR CONV XR2
SECURIT (SEC)	3-B 3 DOOR BASH 3MT 3 DOOR GT WLS STATION WAGON LX 3LK 3 DOOR LX 4LK 4 DOOR LX 4LS 4 DOOR LX-B 5LK 4 DOOR LX	TRACER (TRA)	4-B 4 DOOR BASH 4LT 4 DOOR LTR W-B 4 DOOR BASH
TEMPO (TMO)	2GL 2 DOOR GL 4GL 4 DOOR GL 4LK 4 DOOR LX	FESTIVA (FES)	3-L 3 DOOR BASH 3GL 3 DOOR GL
TAURUS (TAR)	4-P 4 DOOR POLIC 4PL 4 DOOR ALOCK POLIC 4SE 4 DOOR ALOCK SHO 4-G 4 DOOR GL 4LK 4 DOOR LX 4GL 4 DOOR ALOCK GL 4LL 4 DOOR ALOCK LX W-G STATION WAGON GL WLS STATION WAGON LX WEL ST WAGON ALOCK BASH WEL ST WAGON ALOCK GL WLL ST WAGON ALOCK LX	TOPAZ (TOP)	2GS 2 DOOR GS 4GS 4 DOOR GS
T-BIRD (TRD)	2-B 2 DOOR BASH 2LK 2 DOOR LX 2SC 2 DOOR ALOCK SC 2HL 2 DOOR ALOCK BASH 2LA 2 DOOR ALOCK LX	TRABLER (TRB)	4GS 4 DOOR GS 4LS 4 DOOR LX 4GL 4 DOOR ALOCK GS 4LL 4 DOOR ALOCK LX WLS STATION WAGON GS WLS STATION WAGON LX WEL ST WAGON ALOCK GS WLL ST WAGON ALOCK LX
FORD CROWN (CRW)	4-F 4 DOOR FLEET 4-L 4 DOOR BASH	COUGAR (COG)	2XR 2 DOOR XR7 2XL 2 DOOR ALOCK XR7
VICTORIA (VRC)	4LK 4 DOOR LX 4PL 4 DOOR ALOCK FLEET 4BL 4 DOOR ALOCK BASH 4LL 4 DOOR ALOCK LX 4-P 4 DOOR POLICE	ALOCK - EQUIPPED WITH 4-WHEEL ANTI-LOCK DISC BRAKES.	4PL 4 DOOR ALOCK POLIC
LINCOLN TOWN CAR (LNC)	4-L 4 DOOR EXECUTIVE 4-B 4 DOOR SIGNATURE 4DC 4 DOOR CARTER	MERCUY (MRC)	4GS 4 DOOR GS 4LS 4 DOOR LX 4GL 4 DOOR ALOCK GS 4LL 4 DOOR ALOCK LX
		MARV VII 2GC 2 DOOR L&C CONTRL 4-L 4 DOOR EXECUTIVE 4-B 4 DOOR SIGNATURE	

***** 1993 LIGHT TRUCK BODY DESCRIPTIONS *****			
VEHICLE	BODY DESCRIPTION	VEHICLE	BODY DESCRIPTION
F-SERIES 4X2 (FS2)	15P 150 L.DUTY CONV. 25P 250 L.DUTY CONV. 28P 250 H.DUTY CONV. 35P 350 H.DUTY CONV. 15S 150 L.DUTY SUPER 25S 250 L.DUTY SUPER 28S 250 H.DUTY SUPER	35S 350 H.DUTY SUPER 35C 350 H.DUTY CONV. 452 450 H.DUTY CONV.	
EXPLODER (EXP)	2-B 2 DR BASH 2XL 2 DR XL 2XS 2 DR ALGPT 2SB 2 DR BASH	4-B 4 DR BASH 4XL 4 DR XL 4LT 4 DR LIT 4SB 4 DR BASH	(EX2)-4X2 (EX4)-4X4
VILLAGER (VIL)	VGS GS WAGON VLS LS WAGON VAN BASH VAN		
ARROWSTAR 4X2 (AR2)	<- REGULAR BODY -> RNL WINDOW WAGON BASH RWM WINDOW WAGON XL RWS WINDOW WAGON XL RWS WINDOW WAGON XL RWS WINDOW WAGON XL RWS WINDOW WAGON XL RCL CARGO VAN BASH RCM CARGO VAN XL RVL WINDOW VAN BASH RVN WINDOW VAN XL	<- RETIRED BODY -> RNL WINDOW WAGON BASH RWM WINDOW WAGON XL RWS WINDOW WAGON XL RWS WINDOW WAGON XL RWS WINDOW WAGON XL RWS WINDOW WAGON XL RCL CARGO VAN BASH RCM CARGO VAN XL RVL WINDOW VAN BASH RVN WINDOW VAN XL	
***** 1993 ECONOMY/CLUB WAGON *****			
VEHICLE	BODY DESCRIPTION	VEHICLE	BODY DESCRIPTION
(ECN)	<- ECONOMY -> 18B 150 HINGED DOOR BASH 18X 150 HINGED DOOR XL 28B 250 HINGED DOOR BASH 28X 250 HINGED DOOR XL 28S 250 HINGED DR SUPR BASH 25E 250 HINGED DR SUPR XL 38B 350 HINGED DOOR BASH 38X 350 HINGED DOOR XL 35B 350 HINGED DR SUPR BASH 35X 350 HINGED DR SUPR XL 38S 150 SLIDING DOOR BASH 38X 150 SLIDING DOOR XL 38S 250 SLIDING DOOR BASH 38X 250 SLIDING DOOR XL 38S 250 SLIDING DOOR XL 38X 250 SLIDING DOOR XL 3CL 350 COTWAY BASH 3CM 350 COTWAY XL 28T 250 STRIPPED CHASSIS 38T 350 STRIPPED CHASSIS	<- CLUB WAGON -> 18M 150 HINGED DOOR CONV 18X 150 HINGED DOOR XL 18P 150 HINGED DOOR CONV 28M 350 HINGED DOOR CONV 28X 350 HINGED DOOR XL 28S 350 HINGED DOOR XL 28P 350 HINGED DOOR XL 38M 350 HINGED DOOR CONV 38X 350 HINGED DOOR XL 38S 350 HINGED DOOR XL 38P 350 HINGED DOOR XL 38M 150 SLIDING DOOR CONV 38X 150 SLIDING DOOR XL 38M 250 SLIDING DOOR CONV 38X 250 SLIDING DOOR XL 38S 250 SLIDING DOOR XL 38P 250 SLIDING DOOR XL	

ENR-925 3888

12/28/94 CLAIMS LISTING FOR 1994 FORD WYCOFF
 PAGE 1 SORTED BY FILECODE SERIALNO MILESSZ

13-JAN-98 C/O REQUESTED BY:
 DATA SOURCE: PAGES SE-II X53400

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

VEHICLE INFORMATION							REPAIR INFORMATION																			
SERIAL NUMBER	CAR LEAD	D/S	FIS	PLT	PROD	YEAR	SELL DATE	CLAIM NUMBER	NICHO NUMBER	C	WCC	PART NUMBER	CC	CCC	CD	REPR DATE	I	IS	FACT MILES	MATL COST	TOTL COST	LSE HRS	REPR DEALR	ST		
720247	LHC	4-8	WFX	WIX	14MAR94	29MAR94	09627	026562	UVP01831	7D01	13H021	46	L21	46	12APR94	1	2	3113	16.04	24	9.2	04696	GM			
720247	LHC	4-8	WFX	WIX	14MAR94	29MAR94	09627	250037	REC60011							29	08	27AUG94	6	9488	13192	8.00	58	1.5	45260	IN
720247	LHC	4-8	WFX	WIX	14MAR94	29MAR94	09627	278499	PT18C5H0	6M02	713268					58	09MAY95	14	884	16853	10.00	18	0.1	06009	AR	
** COMMENTS-CLAIM #3							COOK-RT DOOR SILL TRIM WARPED TRIM-REPLACE RT BOTTOM DOOR SILL TRIM																			
720247	LHC	4-8	WFX	WIX	14MAR94	29MAR94	09627	278826	QHSOC2H0	2A01	5H308					56	07AUG95	17	807	28704	38.12	102	1.3	06009	AR	
** COMMENTS-CLAIM #4							COOK-ROAR NO IDLE TECH-SIDE TEST AND REPLACE TUNE AND VALVE AND DID QUICKST																			
+ THIS LISTING CONTAINED 4 TOTAL CLAIMS																										

DPA1-025 30001

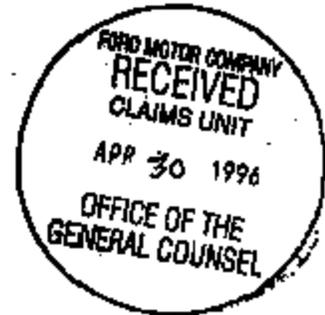
Allstate

ALLSTATE INSURANCE CO.
P.O. BOX 21169
ROANOKE VA 24018

(800) 776-2615

04/23/96

FORD MOTOR COMPANY
3 PARKLANE BLVD
DEARBORN MI 48126



IN REPLY REFER TO:

CLAIM NUMBER: [REDACTED]
OUR INSURED: [REDACTED]
ACCIDENT DATE: 10/06/95
LOCATION: [REDACTED]
AMOUNT OF LOSS: \$ 25,789.25

PARAGOULD AR

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

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

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

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

SINCERELY,
SUBROGATION DEPARTMENT
ALLSTATE INSURANCE COMPANY

CAO:M

I CARRY INSURANCE POLICY NO. _____
WITH _____
NAME OF COMPANY _____
AGENT _____
MY ADJUSTER (CHOOSE ONE) IS _____
MY CLAIM NO IS _____
ADDRESS _____

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

SIGNED: _____ DATE _____

REDACTED

EA02-025 30052 H

HUCKABAY, MUNSON, ROWLETT & TILLEY, P. A.

LAW OFFICES
FIRST COMMERCIAL BUILDING
400 WEST CAPITOL, SUITE 1900
LITTLE ROCK, ARKANSAS 72201
801.774.6200
FAX 801.774.0906

BOB BERTON

August 22, 1997

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED
RESTRICTED DELIVERY - ADDRESSEE ONLY

Ford Motor Company
c/o CT Corporation
417 Spring Street
Little Rock, Arkansas 72201

Re: [REDACTED]

[REDACTED] v. Ford Motor Company

Dear Sir or Madam:

May this letter, along with letters previously sent to the Office of General Counsel of Ford Motor Company by Allstate Insurance Company, serve as official notification, pursuant to Arkansas law, of the above named persons' and entities' intent to file cause of action based on breach of express and implied warranties.

I believe Ford Motor Company has already assigned a claim number to this loss which is 2383022239 MMH.

This cause of action involved a 1994 Lincoln Mercury Towncar Signature four door sedan which burst into flames, totally destroying the automobile and burning the house owned by Mr. and [REDACTED] as well as a house owned by [REDACTED]. Damages in this case exceed federal jurisdictional limits.

As stated above, this letter, along with previously letters sent to Ford Motor Company constitute official notice of breach pursuant to Arkansas Law. If this situation is not remedied within a reasonable time, (thirty (30) days) the parties listed above intend to file suit.

Ford Motor Company
c/o CT Corporation
August 22, 1997
Page 2

If you should have any questions, please do not hesitate to contact me.

Best regards,

Bob Sexton
Bob Sexton

BS/owh

ERG2-025 30004



Unified Investigations & Sciences, Inc.

758 Holcomb Bridge Road

Norcross, Georgia 30071

770-246-0026

Fax 770-246-9438

PRIVILEGED AND CONFIDENTIAL

October 27, 1995

Report Number One

PREPARED FOR: Allstate Insurance Company
Post Office Box 1657
Jonesboro, Arkansas 72403

ATTENTION: James Stidman

INSURED: [REDACTED]

DATE OF LOSS: October 6, 1995

LOSS LOCATION: 608 North 9 & 1/2 Street, Paragould, Arkansas

POLICY NUMBER: 085377290

CLAIM NUMBER: 2383022239

UIS FILE NUMBER: GA01-00163

THIS REPORT FURNISHED AS PRIVILEGED AND CONFIDENTIAL TO ADDRESSEE, RELEASE TO ANY OTHER COMPANY,
CONCERN OR INDIVIDUAL IS THE SOLE RESPONSIBILITY OF ADDRESSEE.

EXHIBIT

A

Insured:
UIS File No.:

GA01-00163

ASSIGNMENT

Assignment received October 16, 1995 with instructions to conduct a limited scene examination. Investigation commenced October 18, 1995.

EXHIBITS

1. Vehicle Inspection Report.
2. Property Description Sheet for 608 North 9 & 1/2 Street.
3. Property Description Sheet for 610 North 9 & 1/2 Street.
4. Thirty (30) Color Photographs with Photo Explanation Sheet.

RISK

The risk involves a single family dwelling which is described in the attached property description sheet. A second property description sheet is included and describes the property at [REDACTED] Street which belongs to [REDACTED] 1994 Lincoln Continental Town Car, Signature Series, was also involved in this fire and is described in the enclosures.

FIRE SCENE EXAMINATION

[REDACTED] owner and occupant of the property at [REDACTED] Paragould, Arkansas, was present during the fire scene examination. [REDACTED] gave me permission to examine his residence and vehicle during my examination which took place on October 18, 1995.

The only known alteration to the fire scene involved removal of fuses from the distribution panel by Mr. Richard Walls, Adjuster for the Columbia Mutual Insurance Company. Columbia Mutual insures the Wycoff's residence and the vehicle, and Mr. Walls conducted an inspection of the property during the week of October 9, 1995.

The risk faces east and runs lengthwise in a north/south direction. At the time of the fire, it was occupied by tenants Jeff and Donna Henry. Exterior examination revealed fire attacked the north end of the property, entering into the attic through the north gabled wall and into the northwest bedroom through its north window. Fire ignited contents of the northwest bedroom and extended south through the attic approximately 16 to 18 feet before it was extinguished by the Paragould Fire Department.

All physical evidence indicates the residence located at [REDACTED] Paragould, Arkansas, was a victim of the fire.

Examination of the [redacted] residence located at [redacted] Paragould revealed fire origination in the carport area with extension south on to the north wall Cunningham residence. The [redacted] residence also faced east, running length ways in a north/south direction with a single car carport attached to its south end. A 5' x 8' utility room was attached to the west end of the carport, and contained the electrical distribution panel.

A 1994 Lincoln Continental was parked approximately 3/4 length under the carport, entering from its east end. The fire originated under the carport and extended up through the ceiling and roof of the carport, destroying a large portion of the roofing and advanced north across the attic of the main residence. The northern fire advance was stopped by the Paragould Fire Department approximately 20 feet north of the south exterior wall.

Exterior examination of the [redacted] residence failed to reveal evidence of an explosion occurring before or during the fire. The grounds were well attended and the building showed good upkeep.

Interior inspection showed no evidence that major contents or appliances were removed prior to the fire.

The fire from the carport attacked both exterior doors, partially destroying those doors before suppression activity could be commenced. There was no evidence of forcible entry to the [redacted] residence.

Examination and removal of the debris from the floor of the carport revealed a large quantity of stored materials in the open carport. Items included bags of clothing, wicker furniture and cardboard boxes containing books and miscellaneous items. The majority of these components were stored along the base of the south exterior wall of the residence and directly in front of the east wall to the utility room. The west breezeway exit was partially blocked by these stored components.

There were no flammable liquid trails or irregular burn patterns detected on the floor of the carport. Excluding the contents of the utility room, there were no energized appliances or receptacles located under the carport. A single incandescent ceramic light fixture had been mounted in the ceiling of the carport, and was recovered within the debris. Inspection of the light switch mounted inside the kitchen revealed that light was "off" when the fire occurred.

Examination of the utility room revealed the majority of its wooden structural components remained intact, though badly charred. A section of its roof was destroyed over its north and east ends, and the fire patterns document fire extension on to the utility room from mid-point in the carport. The electrical distribution panel was mounted to the west wall in the southwest corner, and unburned wooden structural materials remained behind, around and above the panel. The meter base and a cut-off switch panel, located on the west exterior wall also remained intact.

There is no specific evidence to indicate fire origination, or specific malfunctions in these electrical components.

A single light fixture and receptacle were located within the utility room; however, fire flow patterns exhibited flame impingement on to these components and not away from them. The evidence indicates the utility room, and its contents, were victims of fire and not the area of origin.

The greatest destruction to the residence occurred near mid-point in the carport, directly above the engine compartment of the Lincoln Continental. Fire flow patterns extend up from the front section of the vehicle with eventual extension through the ceiling, attic and roofline. Portions of the roof collapsed and were lying on the back portion of the vehicle with very small remains of wooden structural and roofing components recovered on, in and around the front portion of the vehicle. The roof contained approximately four layers of shingles which aided in the horizontal fire spread into the attic of the residence and south through the attic gable and on to the Cunningham residence.

The vehicle suffered heavy fire damage throughout its engine, passenger and trunk compartments. Oxidation patterns reflect fire origination at the front of the vehicle with fire flow through the passenger compartment toward the rear. Higher levels of oxidation and distortion were noted on the right front fender and greater destruction occurred to the right front wheel. Fire patterns reflect fire extension from within the engine compartment through the fender well, on to stored combustible materials positioned along the base of the south wall of the residence. The ignited materials were located in a breezeway opening, which facilitated the spread of the fire.

All four tires were partially destroyed, and the vehicle was resting nearly flat on the carport slab. A portion of the roof of the carport was resting across the back of the vehicle, and remained attached to the southeast corner of the residence. specifically instructed the vehicle not be moved until after he completed his inventory in the residence. He feared the movement of the vehicle would cause additional collapse of the roof section over the garage, pulling away sections of the south exterior wall to the residence. agreed to have the vehicle moved after his inventory was completed.

The vehicle's engine hood was destroyed by the fire, and a large quantity of structural components fell down on to and within the engine compartment. The ceramic ceiling light fixture from the carport ceiling was recovered resting on the bell housing for the transmission.

Numerous small pieces of severely burned wooden structural components were packed around the engine, and roofing tar was melted on to engine components. Roofing tar was also melted on to the steering column and dash materials, indicating the windshield broke before roofing materials became involved in the fire.

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Examination of the engine compartment revealed destruction to hoses, belts, rubber and plastic components along the right side of the engine. The lower radiator hose and some plastic components on the left side of the engine remained partially intact. The right side of the engine exhibited the highest level of fire damage to the vehicle.

The battery and power distribution panel were located in the right front corner of the engine compartment. The majority of electrical circuits contained within the wiring harness also originated in the right front section of the engine compartment. The battery casement and insulation on electrical conductors were destroyed by the fire. Numerous electrical conductors, positioned in the right front corner of the engine compartment, were broken due to debris falling from the ceiling and attic on to and through the engine compartment. The power distribution panel was identified within the debris although it suffered extensive fire damage, as depicted within the attached photos. Field examination of the remains of the power distribution panel failed to identify a specific malfunction due to the extensive damage it received. Laboratory examination is recommended of the remains of the distribution panel and electrical circuits from the right front portion of the engine compartment.

A strong odor of gasoline was detected during the examination, and it was determined the odor was coming from beneath the vehicle in the area of the fuel tank. The vent and fuel nozzle spout was blown from the filler spout, out on to the floor of the carport, and the fuel spout access door was extended to its open position with remains of carport structural components resting on it, in an open position. No documentation of rupture to the fuel tank could be made because of the limitations set forth by [REDACTED]. The vehicle could not be raised sufficiently to examine the fuel tank and undercarriage without moving the section of carport roofing resting on the vehicle.

PRELIMINARY FINDINGS

Based upon the observations and analyses made during the fire scene examination, evidence documents fire origination in the right front corner of the engine compartment to a 1994 Lincoln Town Car, Signature Series, belonging to [REDACTED] Paragould, Arkansas. Field conditions and restrictions on the investigation made it impossible to document a specific malfunction on the part of the vehicle relative to the fire cause. I recommend an electrical engineer be associated with the investigation and allowed to inspect the electrical components in the area of origin for the fire in an effort at documenting a malfunction towards subrogation.

It is further recommended the vehicle be removed from the fire site and taken to a storage facility where it can be examined jointly by the fire investigator and electrical engineer in furtherance of the analysis. The fire investigator should be present when the vehicle is removed from the fire site in order to recover any components which may separate from the vehicle during movement.

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Recorded statements should be obtained from the [REDACTED] regarding maintenance and operation of the vehicle, and a neighborhood canvas conducted in an effort to locate potential eye witnesses to the fire.

Fire department investigators and firefighters should be interviewed regarding their observations during suppression activity and follow up investigation.

I await your further instructions regarding these activities.

James F. Swain
Senior Investigator
901-853-1517
800-816-1699