

EA02-025

FORD 10/27/03

LETTER TO ODI

APPENDIX M

BOOK 16 OF 22

PART A-D

PART B

Vehicle Inspection Report

Exhibit 1

Owner				UIS File Number	G-A 00163
Manufacturer	Year	Mfg.	Body Style	4 Door - Sedan	
Liaison-McCormick	94	Town Car Signature	Color	Black (17,000)	
State Inspection	Date		VIN No.	1A10022370PVT20047	
State Registered			Examination Location	Poughkeepsie, NY	
Displayed on Vehicle	Year	State			
Tag Number: D-20047					
Vehicle Examination Date					
10-18-95					
Fire-Damaged Areas	<input checked="" type="checkbox"/> Exterior	<input type="checkbox"/> Interior	<input type="checkbox"/> Engine Compartment		

	Bumped	Distorted/Melted	Accumulation 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"/>
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"/>
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"/>
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"/>
Underside	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

R Remarks Vehicle parked under carport that burned extensively

TIRES

Burned		Unusual Tread Wear	
Yes	No	Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Tires indicate signs of recent removal or exchange? Yes No

Wheels or wheel covers indicate recent removal/exchange? Yes No

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

Remarks

GLASS

	Smashed	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 type="checkbox"/>	<input type="checkbox"/>
Right Door(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rear	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sunroof	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Remarks

- I After market electrical accessories
- N Door(s) open during fire
- T Window(s) open during fire
- E Was key in the ignition/floor
- R Have any accessories been removed
- O Any unusual burn patterns
- R Any abnormal melting
- O Any unusual objects in vehicle
- R Was truck open during fire
- O Any unusual objects in truck

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>

Remarks Standard Equipment

C	Hood open during fire	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Oil below lowest mark on dipstick	<input type="checkbox"/>	<input checked="" type="checkbox"/>
O	Radiator melted	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Evidence of antifreeze fluid leakage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
M	Upper radiator hose burned	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unusual odorous color motor oil	<input type="checkbox"/>	<input checked="" type="checkbox"/>
N	Lower radiator hose burned	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Heats or cooler in transmission case	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P	Drive belts burned	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Transmissions-case burned/melted	<input type="checkbox"/>	<input checked="" type="checkbox"/>
G	Other hoses burned	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Transmission has inadequate lubrication	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A	Fan and shroud burned	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unusual odorous transmission fluid	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T	Inner fenders burned	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Any problems with drive-train/suspension	<input type="checkbox"/>	<input checked="" type="checkbox"/>
M	Heating system burned	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Motor mounts burned	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Remarks Chapter 10 refused to allow vehicle to be moved by investigator
To allow inspection of vehicle damage

	Missing	Burned/Distorted	Melted/Molten	Shorted/Armed
E				
L	Battery	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
E	Battery connections	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C	Battery cables	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
T	Starter	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
R	Alternator/generator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I	Ignition switch	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C	Fuse panel	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A	Wiring harness	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
L	After market accessories	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Remarks _____

	Missing	Burned	Distorted/Molten	
I				
F	Filter cap	<input type="checkbox"/>	<input type="checkbox"/>	
F	Filter assembly	<input type="checkbox"/>	<input type="checkbox"/>	
I	Fuel tank assembly	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
S	Fuel lines	<input type="checkbox"/>	<input type="checkbox"/>	
F	Fuel pump(s)	<input type="checkbox"/>	<input type="checkbox"/>	
I	Fuel filter(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E	Carburetor/ injectors/ turbos	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
L	Air intake filters	<input type="checkbox"/>	<input type="checkbox"/>	
N	Fuel vapor recovery system	<input type="checkbox"/>	<input type="checkbox"/>	
A	Exhaust and tail pipes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
N	Muffler and catalytic converter	<input type="checkbox"/>	<input type="checkbox"/>	
D				
S				
T	Any loose fuel line connections?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
E	Any evidence of tampering?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
M	Poll 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 checked="" type="checkbox"/> Full	

Remarks Filler cap blown out & Spout unusable to inspect under carriage 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 inspection can be completed.

Property Description

U.S. No. GA 00163

Street [REDACTED] City Paragould State AR

Occupancy: Dwelling Business Unoccupied Other Owner occupied Tenant occupied Approximate age 34 yearsBuilding construction: Masonry Metal Wood OtherRoofing 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 spaceHeating: Electric Natural gas Propane gas OtherAir conditioning: Electric Natural gas Propane gas Other 14000 unitsElectrical service connected Yes No UnknownAlarm system: Yes No Type _____ Local MonitoredGarage: None Attached Detached Approximate size 12 x 34Outbuildings on premises Yes No Damaged UndamagedOutside Conditions: Normal Unkempt Well groomed OtherBuilding Conditions: Excellent Average Poor OtherFire 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 10-18-75 Date examination completed 10-19-75

Property Description

Insure [REDACTED] UES No. G-A 00163

Street [REDACTED] City Paragon Id State AR

Occupancy: Dwelling Business Unoccupied Other Owner occupied Tenant occupied Approximate age _____ yearsBuilding construction: Masonry Metal Wood OtherRoofing 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 Crawl spaceHeating: Electric Natural gas Propane gas Other CentralAir conditioning: Electric Natural gas Propane gas Other CentralElectrical service connected Yes No UnknownAlarm system: Yes No Type _____ Local MonitoredGarage: None Attached Detached Approximate size 12 x 24Outbuildings on premises Yes No Damaged UndamagedOutside Conditions: Normal Unkempt Well groomed OtherBuilding Conditions: Excellent Average Poor OtherFire protection: Paid Paid & Volunteer Unknown Volunteer

Department Paragon Id, AR Distance to Station _____

Completed during examination Diagram Video Photographs Measurements

Date examination began 10-18-75 Date examination completed 10-18-75

Insured:
UIS File No.:

[REDACTED]
GA01-00163

PHOTOGRAPH EXPLANATION SHEET

1. View showing the east and south sides of the [REDACTED] 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 [REDACTED] 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.:

[REDACTED]
GA01-00163

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.

Unified Investigations & Sciences, Inc.

Inured: [REDACTED]

UIS File #: G-A 00163



Photo #

1



Photo #

2

Unified Investigations & Sciences, Inc.

Dated: _____

UIS File #: GA 99 163



Photo #
2



Photo #

4

8962-825 57274

Unified Investigations & Sciences, Inc.

[Journal]

UIS File # C.A. 00 163



Photo 5

5



Photo 6

6

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Forwarded:

UIC File # G-A-00163



Photo

7



Photo

8

Heavy oxidation

EP02-025 57276

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Inured: _____

UIS File #: GA 00163



Photo A
1



Photo B
10

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Insured: [REDACTED]

UIS File #: G-A 00163



Photo:

11



Photo:

12

Unified Investigations & Sciences, Inc.

Indexed: [REDACTED]

UIC Photo # GA 00163



Photo #

13



Photo #

14

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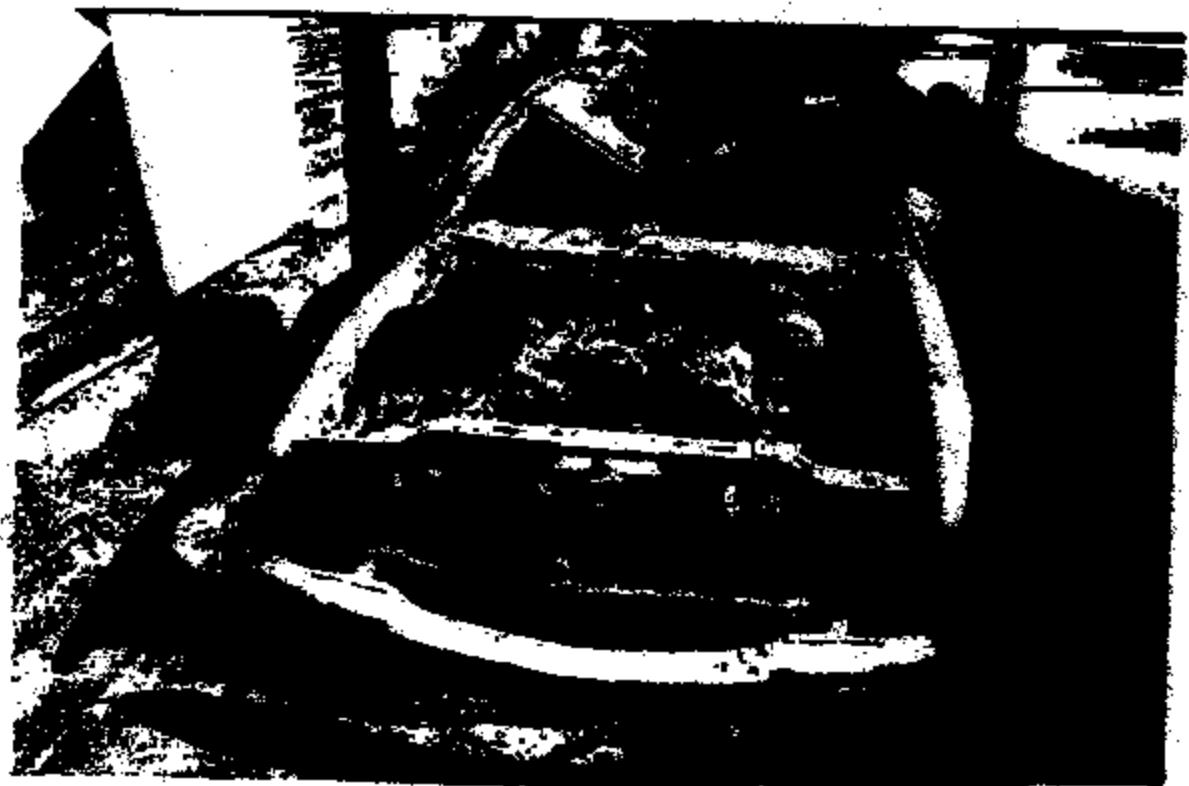
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UBI File #: GA 00163



Photo

15



Photo

16

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Inured:

UIS File # G-A 00163



Photo 17



Photo 18

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Embossed:

UIS File #

G.A. 00163



Photo:

19

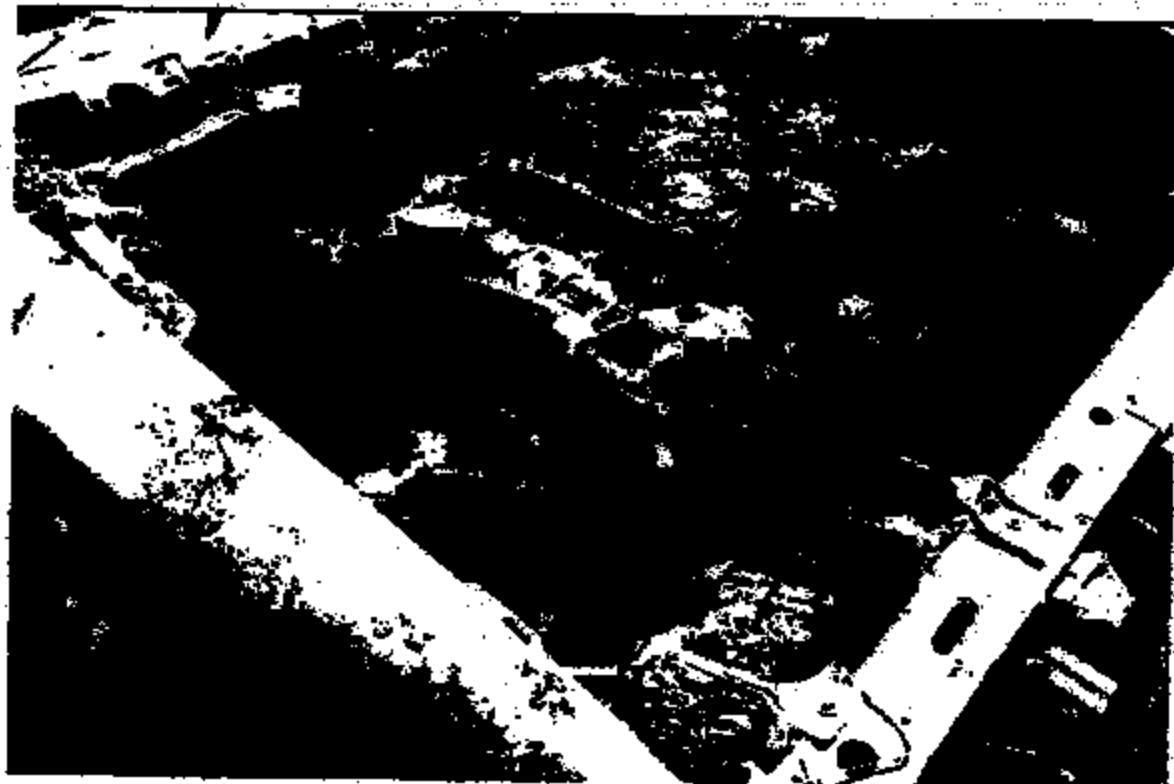


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20

0002-025 ST262

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Insured:

UIS File # GA 00163



Photo #

21



Photo #

aa

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Insured:

UIS File #:

GA 00163



Photo

23



Photo 1

24

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Insured: [REDACTED]

UIS File # G-A 00163



Photo 25



Photo 26

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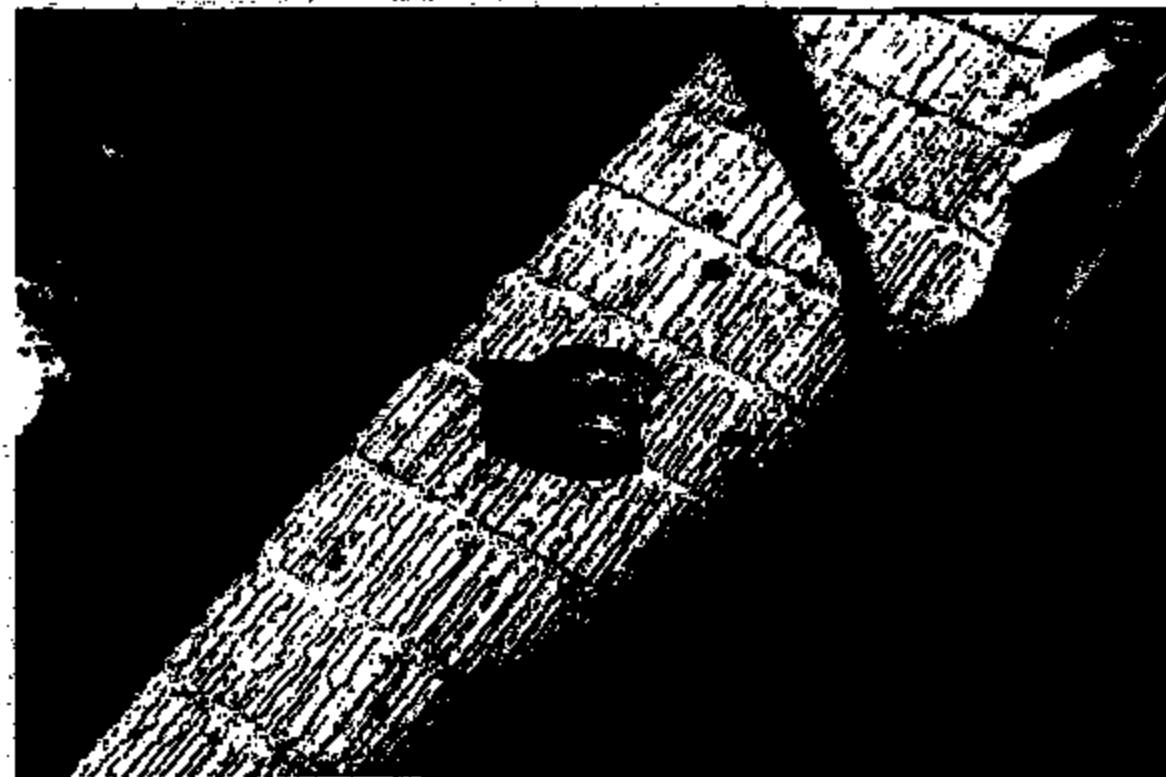
Insured: [REDACTED]

UIS File #: G-A 00163



Photo

37



Photo

a.P

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Insured: [REDACTED]

UIN File #: GA 00163

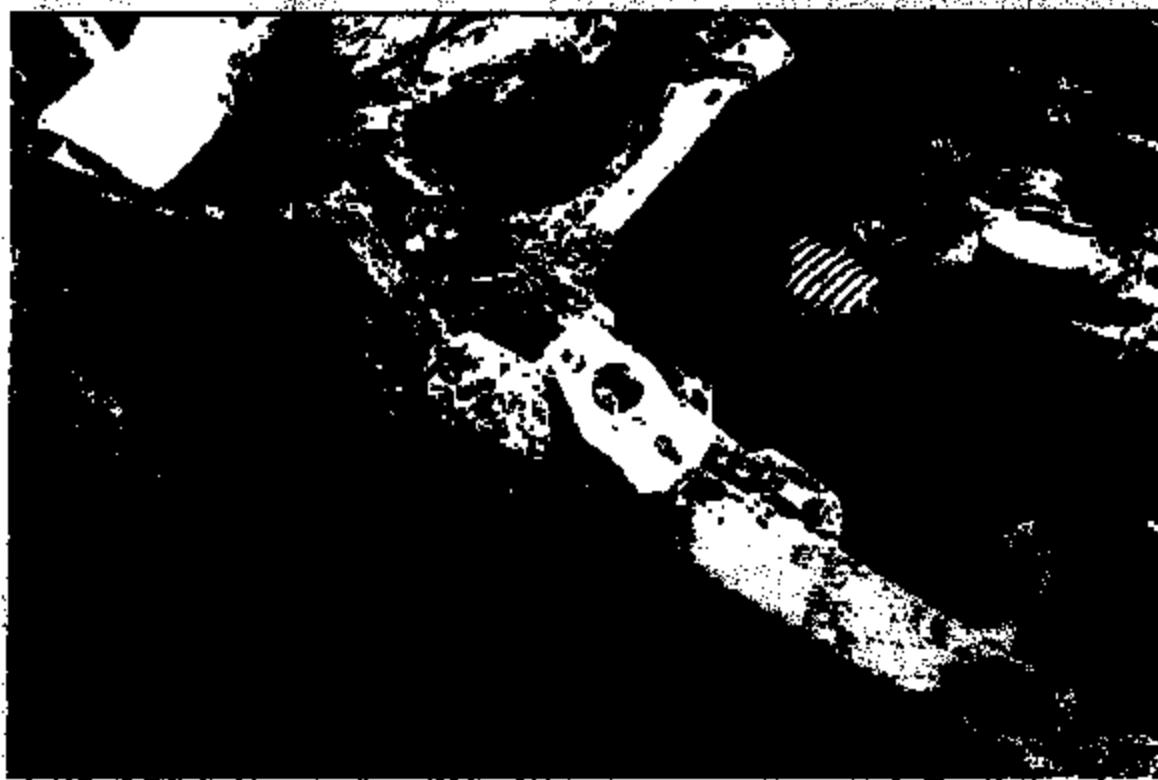


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29

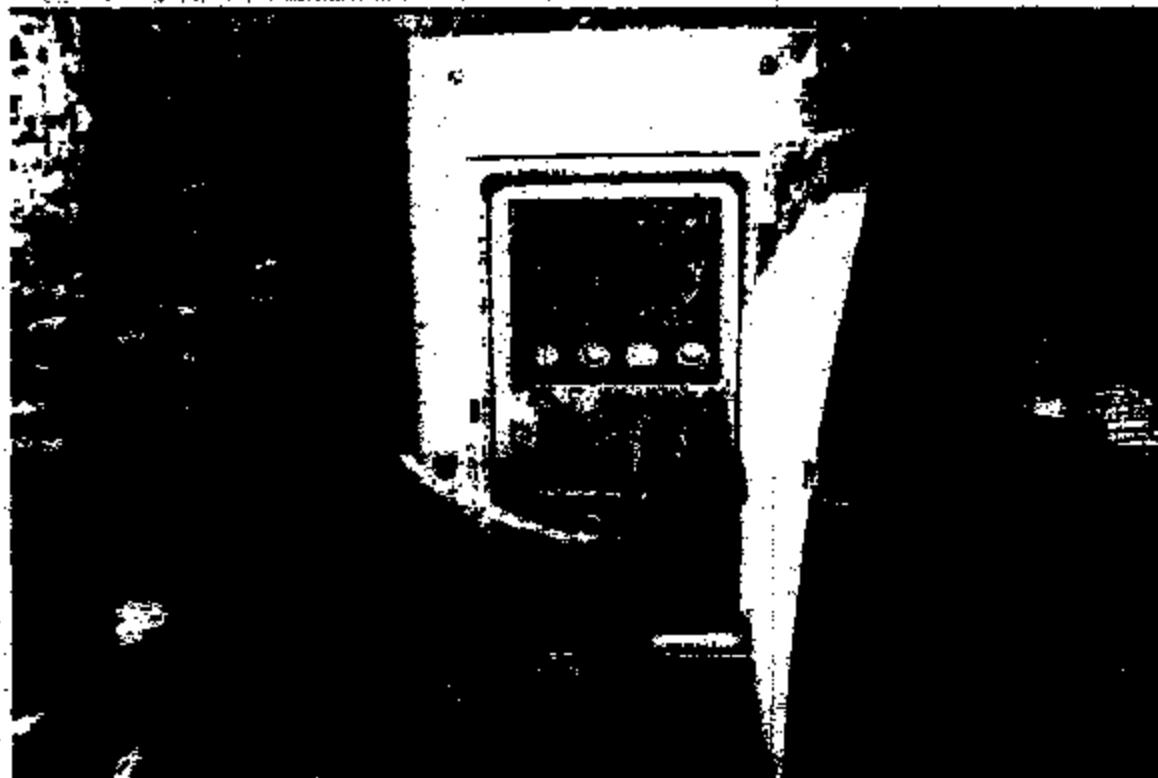


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30



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.

EXHIBIT

B

ENR2-025 57246

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

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 [REDACTED] 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

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 [REDACTED] 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.: GABI-40163

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/dn

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 oxidation 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 oxidation 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.

Insured:

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 oxidization and distortion 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:
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 #: GAOO163



Photo #

1

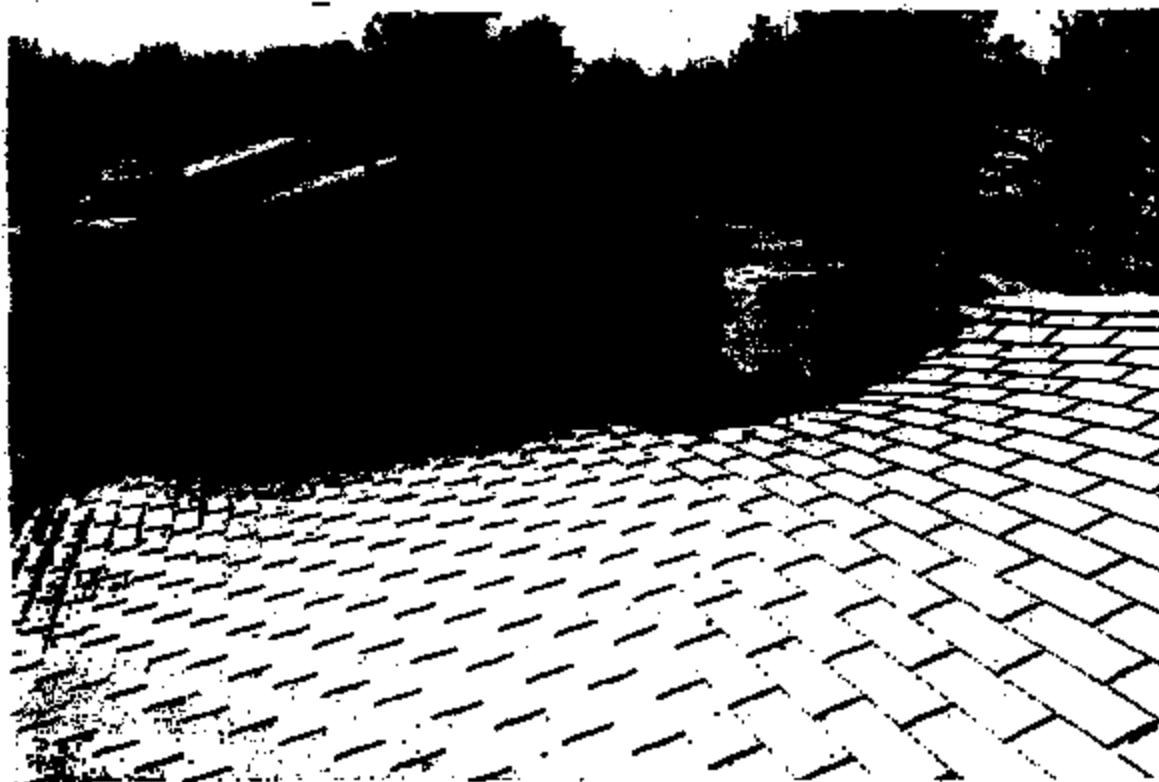


Photo #

2

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File # GA 00 163



Photo # 4



Photo # 5

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: G-A 00 163

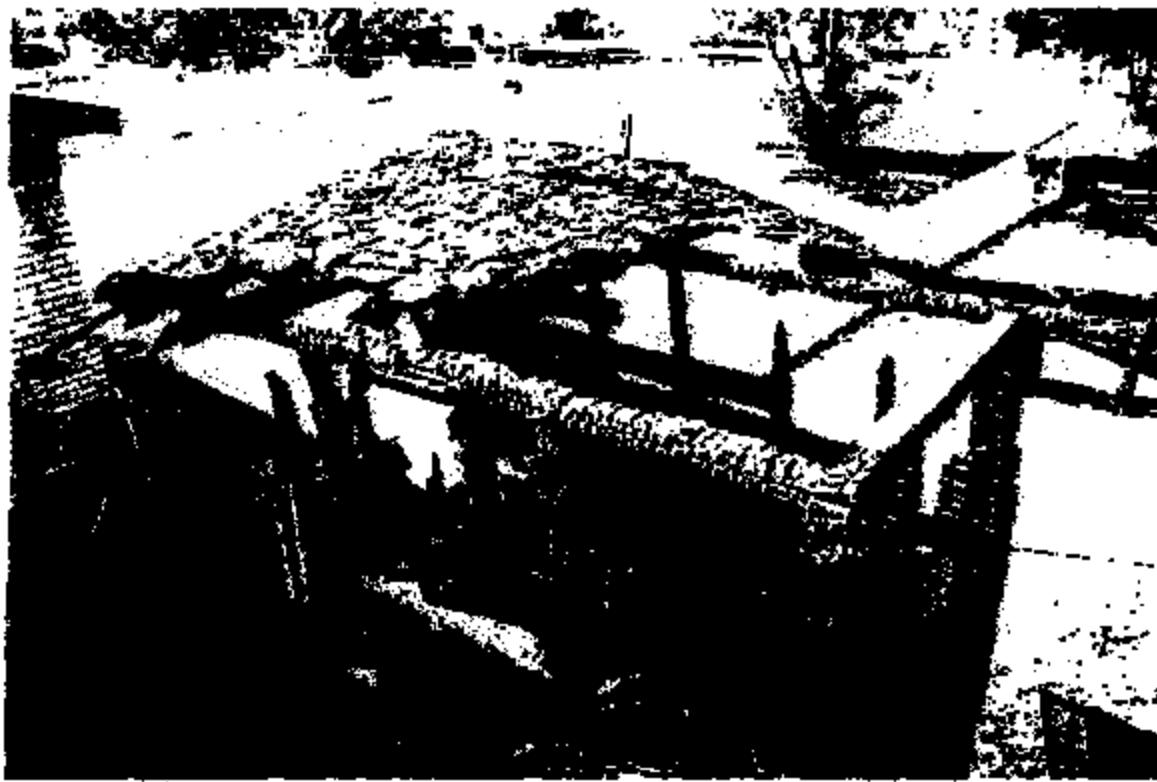


Photo #

5



Photo #

6

Unified Investigations & Sciences, Inc.

Insured:

UIS File # G 4 06 16 3



Photo #

7



Photo #

8

Unified Investigations & Sciences, Inc.

Incurred:

UIS File #: G-400 163



Photo #

9



Photo #

10

United Investigations & Sciences, Inc.

UIS File # 6A00163

Inured:



Unified Investigations & Sciences, Inc.

Insured:

UIS File #: G-A00 163



Photo #

13



Photo #

14

Unified Investigations & Sciences, Inc.

Insured:

UIS File # GA00163



Photo 1

15



Photo 2

16

Unified Investigations & Sciences, Inc.

Insured:

UIS File # GA00163



Photo #

17

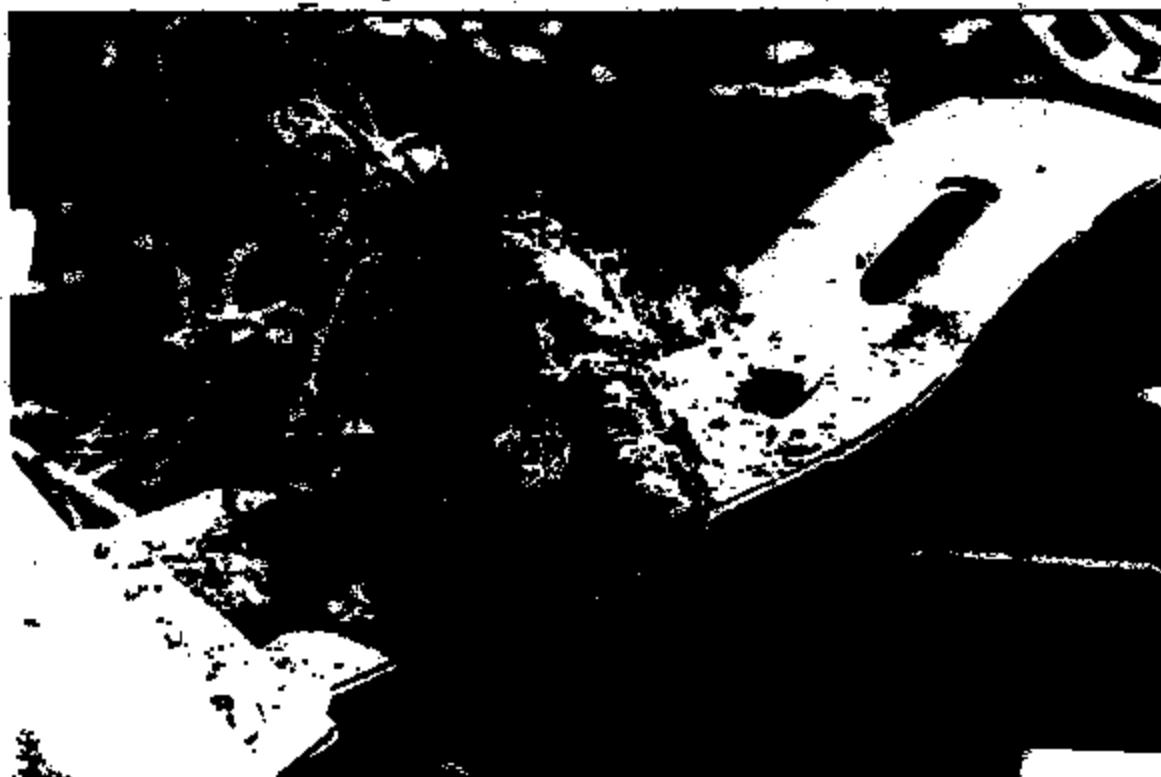


Photo #

18

Unified Investigations & Sciences, Inc.

Insured:

UIS File #: G-A00 162



Photo #

19



Photo #

20

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: G-A00163



Photo #

51



Photo #

52

Unified Investigations & Sciences, Inc.

Insured: _____

UIS File #: GA00163



Photo #

23



Photo #

24

Unified Investigations & Sciences, Inc.

Insured [REDACTED]

UIS File # G.A.00163



Photo #

25



Photo #

26

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA00163



Photo #

27



Photo #

28

Unified Investigations & Sciences, Inc.

Insured: [REDACTED]

UIS File #: GA 00 163



Photo #

37

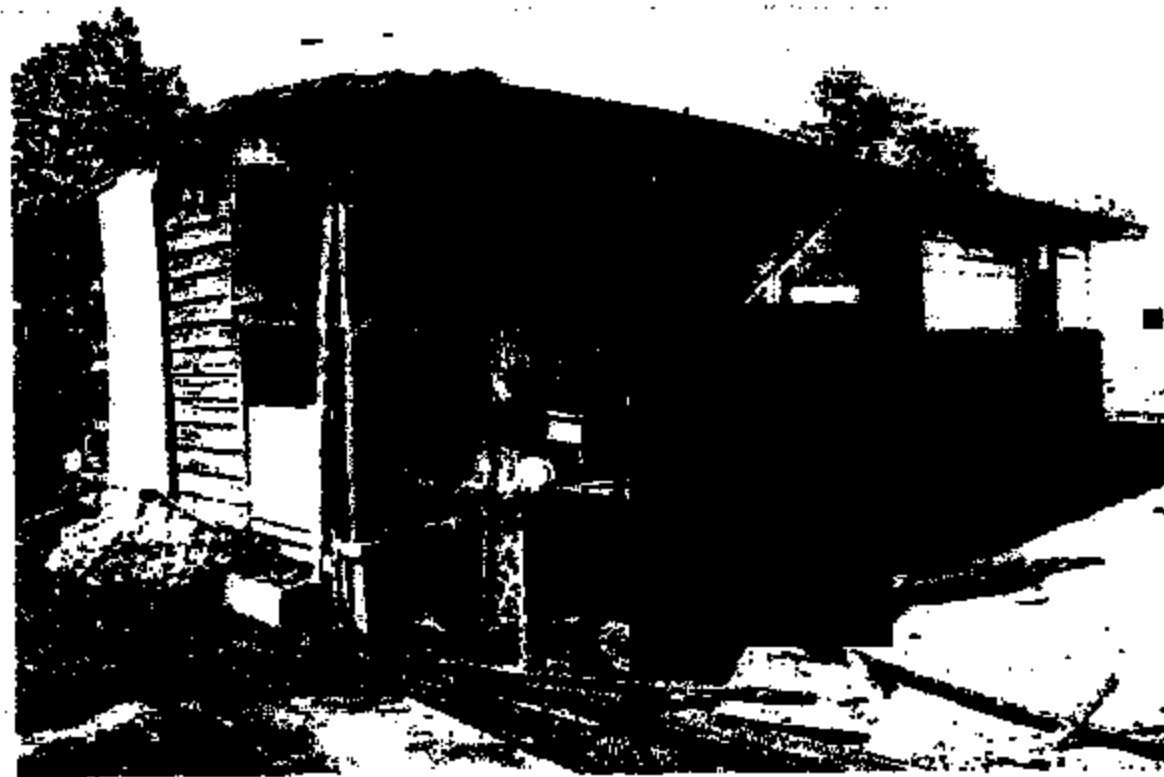


Photo #

38

1 RICHARD WALLS,

2 the witness hereinbefore named, having been previously
3 cautioned and sworn, or affirmed, to tell the truth, the whole
4 truth, and nothing but the truth, testified as follows:

5 EXAMINATION

6 BY MR. SALLINGS:

7 Q. Mr. Walls, what is your address?

8 A. 501 West Sevier Street, Benton, 72015.

9 Q. Is that where you were living back in October of '95?

10 A. Right.

11 MR. SALLINGS: Okay. When is this case set? I
12 forgot.

13 MR. ALEXANDER: End of April.

14 MR. SEKTON: End of April, first of June.

15 BY MR. SALLINGS:

16 Q. Are you going to be out of state in April of this year, as
17 far as you know?

18 A. I'm out of state just about every week, so I don't know.

19 Q. Are you?

20 A. It depends on what kind of assignments I get.

21 Q. Okay. And you travel all over the country, or what?

22 A. I travel the entire state of Arkansas, plus south Missouri,
23 and some in Kansas and Oklahoma.

24 Q. Okay. What is your occupation?

25 A. I'm an insurance investigator adjuster.

EXHIBIT

Gwendolyn R. Perkins, CCR
Bushman Court Reporting
(501) 372-5115

C

1 A. She can't type signals.
2 Q. You said you moved them. What did you do?
3 A. I moved them where I could photograph them.
4 Q. Okay. Photograph --
5 A. I left them there. I didn't really alter the thing any. I
6 just photographed them and held them like that, so I could have
7 a background.

8 (The witness indicated.)

9 BY MR. SALLINGS:

10 Q. Held them in your hand?
11 A. Yeah.
12 Q. And took a photograph of them?
13 A. Right.
14 Q. Okay. Why did you do that?
15 A. Because there was a short circuit at that point. And I
16 photographed that, since it was a possible point of origin.
17 Q. Okay. You said there was a short circuit. What do you
18 base that on, your experience?
19 A. Forty years of experience and the physical appearance of
20 the conductor.
21 Q. Okay. And I meant to ask you, have you had training in
22 fire investigation?
23 A. Yes.
24 Q. What type have you had?
25 A. I've had electrical training in the army. I've had

1 training in fire and ordinance in the army. I've had numerous
2 seminars on fire investigation throughout my insurance career.

3 Q. You say numerous?

4 A. Both in company and some other. I attend -- normally
5 attend a seminar each year with the IAAI, which is the
6 International Association of Arson Investigators, and just
7 basically the formal in-house schools with the company.

8 Q. Okay. How many seminars of that nature have you attended,
9 approximately?

10 A. Probably 25.

11 Q. And how many fires have you investigated over the course of
12 your career?

13 A. I have no idea. Two to 10,000.

14 Q. Okay.

15 A. A lot of them.

16 Q. All right. Have you ever testified as an expert in the
17 field of fire investigations?

18 A. Yes.

19 Q. How many times?

20 A. Testified in court, or at a deposition, or what?

21 Q. Both. Include both.

22 A. In a deposition, probably 25 to 30 times, and then I've
23 been to court 13 times.

24 Q. Testifying as an expert in the field of fire cause and
25 origin?

- 1 A. Right.
- 2 Q. Okay. Have you ever testified as an expert in Arkansas in
3 fire cause and origin?
- 4 A. Yes.
- 5 Q. How recently?
- 6 A. It's been 12 years.
- 7 Q. Okay. Over the last 12 years, you've not testified as an
8 expert?
- 9 A. Not in the state of Arkansas, no.
- 10 Q. Okay. In other states, have you?
- 11 A. I have in Missouri.
- 12 Q. Okay. Now, you moved the wires and the conductors in the
13 storage room?
- 14 A. Right.
- 15 Q. You said you also moved some wood debris from the top of
16 the vehicle.
- 17 A. Yes.
- 18 Q. Explain what you did.
- 19 A. There was some heavier -- not speaking about ashes, but
20 short pieces of charred wood that I moved and dropped to the
21 side of the vehicle --
- 22 Q. Which side --
- 23 A. -- from the engine compartment.
- 24 Q. Which side did you drop them on?
- 25 A. I have no idea.

1 Q. Okay. Was anyone there other than you on behalf of
2 Columbia Insurance to do the inspection or the investigation of
3 the fire scene that day?

4 A. No.

5 Q. Was anyone there other than you and Mr. Wycoff or his
6 family to do an investigation or inspection of the fire scene
7 while you were there?

8 A. No.

9 Q. Okay. All right. When you left -- you left there. Did
10 you have an idea or an opinion about where the fire started?

11 A. I had two possible, two possibilities.

12 Q. Okay. Did you write those down somewhere?

13 A. In -- I think I did in my report.

14 Q. Okay.

15 A. I filed a PILRR report either the next day or within --
16 you're looking at it there. What's the date on that?

17 Q. October the --

18 A. It would be down at the bottom down there.

19 Q. October the 13th.

20 A. Okay --

21 MR. SALLINGS: Can I borrow a sticker? I'm going
22 to mark this as Exhibit Number 1, if I can find a place to
23 put it, Exhibit Number 1 to your deposition.

24 (Exhibit Number 1 was marked for identification.)

25 THE WITNESS: At any rate, that's within a week,

1 do put on the form?

2 A. I try to be, yes.

3 Q. Okay. Now, it has a section in here that asks, "Known
4 cause of loss." Do you see that?

5 A. Yes.

6 Q. And you filled something in there, did you not?

7 A. Yes.

8 Q. And you put in electrical -- wait -- "E-L-E-C-T," which I
9 guess is short for electric or electrical?

10 A. Right.

11 Q. "Short at dist," D-I-S-T, which I guess is short for
12 distribution?

13 A. Panel, yes.

14 Q. Panel? And you were referring to that section in the
15 storage room, were you not?

16 A. Right.

17 Q. Okay. And is that all you put in there for known cause of
18 loss?

19 A. That's all I put on that form, yes.

20 MR. SALLINGS: All right. Okay. I want to
21 attach that to the deposition.

22 BY MR. SALLINGS:

23 Q. Was there another cause, other than what you put on the
24 form?

25 A. There was another possibility.

1 recommendation that you all, Columbia Insurance, hire another
2 fire investigator to come in and look at the place?

3 A. No.

4 Q. Did you recommend that you hire any type of specialist or
5 expert to come in and look at the place?

6 A. As I recall, I did not.

7 Q. Okay. When you left, was it your opinion that -- when you
8 left the inspection that day, was it your opinion that there was
9 any basis for seeking subrogation against Ford Motor Company or
10 anybody else?

11 A. No.

12 Q. Okay. And that's based on your belief and opinion that the
13 fire had started in the storage room?

14 A. It's based on my belief and opinion that that was a
15 possible. If I have two probable -- two possible causes for a
16 fire or points of origin for a fire, at that point I have to
17 evaluate the cost of bringing in engineers and people.

18 Q. Okay. If you had a strong belief that you could recover or
19 subrogate against Ford Motor Company, would you have done it?

20 A. Yes.

21 Q. Okay. Now, tell me what facts or observations that led you
22 to believe that the origin of the fire might have been in the
23 car.

24 A. The fact that the hood was completely missing. There was
25 aluminum residue, which indicated to me that the hood was

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

PROPERTY INSURANCE

LOSS REGISTER

INSURED: (If a business then enter full name of business)

1. Please type or print.
2. Use the space below as necessary.
3. When more than one box is required then number the boxes and staple together.
4. You MUST keep a copy for your files.

PAGE
NUMBER

CONTINUATION PAGE	CONTINUATION PAGE	CONTINUATION PAGE
<i>Boysen's Passenger Ave.</i>		
LOCATION OF LOSS <i>Salem</i>		
DATE OF LOSS <i>10/13/05</i>		
TIME OF LOSS <i>10:00</i>		

INSURED BY (Enter ONLY those firms involved and omit cents)

COMPANY	NAME	policy no.	state no.	loss & coverage	adjuster
Columbus Mutual Ins Co		448-121-845-			
amount of policy	\$125,000	23,450		9,450	
total insurance if more than one policy	\$125,000	23,650		9,450	
undiscounted cash value	\$20,000	25,200			
actual cash value	\$20,000	25,200			
estimated loss	\$20,000	25,200		6,000	

LOSS INFORMATION (Check applicable boxes)

Only	Known cause of loss: <i>elect short - a dirt particle</i>	was fire dept. report reviewed? <i>NO</i>
Only	<input checked="" type="checkbox"/> building <input type="checkbox"/> contents <input type="checkbox"/> liability <input type="checkbox"/> other liability	
Only	<input type="checkbox"/> check box if vacant <input type="checkbox"/> check box if under construction	Insured's fire losses last five years: <i>\$0</i>

Only	<input type="checkbox"/> motor equipment <input type="checkbox"/> cash <input type="checkbox"/> clothing <input type="checkbox"/> home <input type="checkbox"/> gear <input type="checkbox"/> jewelry <input type="checkbox"/> tools <input type="checkbox"/> residential <input type="checkbox"/> office equipment <input type="checkbox"/> fixtures <input type="checkbox"/> sports equipment <input type="checkbox"/> tools <input type="checkbox"/> commercial <input type="checkbox"/> other <input type="checkbox"/> car <input type="checkbox"/> office furniture <input type="checkbox"/> supplies <input type="checkbox"/> vehicles <input type="checkbox"/> V.O.T.V. <input type="checkbox"/> other <input type="checkbox"/>
------	---

OTHER PARTIES TO FIRE LOSSES (If a business then enter full name of business)

Fire Apparatus Only: 1—Partner, 2—Agent, 3—Attorney, 4—Insurance Office, 5—Banking/Mortgage, 6—Public Adjuster,
7—Broker, 8—Treas., 9—Chaplain, 10—Title/Mortgage, 11—Other

name (last, first, middle initial)	name (last, first, middle initial)
<i>Fanny G. Larson</i>	<i>Jessie M. Larson</i>
name (last, first, middle initial)	name (last, first, middle initial)
<i>6236 5th St. Apt. A</i>	<i>6236 5th St. Apt. A</i>
EXHIBIT NO. 1	EXHIBIT NO. 1
name (last, first, middle initial)	name (last, first, middle initial)
<i>G. LARSEN</i>	<i>Jessie M. Larson</i>

ADJUSTER

name of adjusting firm <i>Columbus Mutual Ins Co</i>	I certify that I provided the above information and to the best of my knowledge, information and belief, all of such information is accurate.
PO Box # <i>618</i>	adjuster's signature <i>Timothy H. Miller</i>
City <i>Columbus</i> MI <i>43203</i>	date of this report month day year <i>10/13/05</i>
Phone <i>(614) 878-4525</i>	name of adjuster <i>Richard K. Wells</i>

1 JAMES STIDMAN,

2 the witness hereinbefore named, having been previously
3 cautioned and sworn, or affirmed, to tell the truth, the whole
4 truth, and nothing but the truth, testified as follows:

5 EXAMINATION

6 (Mr. Alexander not present.)

7 BY MR. SALLINGS:

8 Q. Tell us your name, please.

9 A. James Stidman.

10 Q. S-T-I-D-M-A-N?

11 A. S-T-I-D-M-A-N.

12 Q. Okay. Mr. Stidman, how are you employed?

13 A. I'm an employee of Allstate Insurance Company.

14 Q. How long have you been employed with Allstate?

15 A. I hired on in February of 1987. Almost 12 years.

16 Q. Okay. Allstate all that time?

17 A. Yes.

18 Q. Okay. And what is your job title with them?

19 A. I'm a staff claim representative.

20 Q. What is a staff claim representative? What are his duties?

21 A. It's basically a claims adjuster position.

22 Q. Does that --

23 A. All the duties that, you know, a claims adjuster entails.

24 Q. Does that have some sort of seniority?

25 A. It is a -- yes. You start out as -- I think there's two

EXHIBIT

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Gwendolyn R. Perkins, CCR
Bushman Court Reporting
(501) 372-5115

E982-625 57319

1 promotions in that position, yes.

2 Q. And what are your duties as a staff claim representative?
3 And you and I know what an adjuster is.

4 A. Right.

5 Q. But I'm trying to make sure that the record is clear of
6 what you do.

7 A. It would be all the duties, as you said, that was entailed
8 of a claim adjuster to evaluate coverages, to estimate losses,
9 conduct investigations of claims, and to settle the losses.

10 Q. Okay.

11 A. It's basically -- there's no special -- it's just a -- it's
12 a claim adjuster position with some seniority. I mean, you
13 know, I've been promoted.

14 Q. Do you specialize in any particular area?

15 A. I only work homeowner claims, property claims.

16 Q. Okay. But that -- that covers fire, hail loss?

17 A. Right.

18 Q. Anything?

19 A. Small peril.

20 Q. Have you adjusted fire claims before the Wycoff claim?

21 A. Yes, sir.

22 Q. And how many, roughly, over the years?

23 A. I wouldn't have any idea. I started working homeowner
24 claims in 1989.

25 (Mr. Alexander returned.)

1 BY MR. SALLINGS:

2 Q. Okay.

3 A. You know, I'd be afraid to even guess.

4 Q. More than ten?

5 A. Yes.

6 Q. Have you ever been involved in any subrogation claims
7 before?

8 A. Yes.

9 Q. On behalf of Allstate?

10 A. Yes.

11 Q. Where you investigate an incident and then decide that you
12 may have a right to subrogating it to someone else?

13 A. Yes.

14 Q. Is that a pretty common thing in your position?

15 A. It's fairly common. Every claim that we investigate, you
16 have to rule out a subrogation potential.

17 Q. Okay. Have you, over the course of your employment, made
18 decisions to seek subrogation against other manufacturers or
19 other insurance companies?

20 A. Yes.

21 Q. How many times, thousands?

22 A. No. No. To give you, I mean, a rough idea, maybe 10 or 15
23 files a year, maybe something like that.

24 Q. Okay.

25 A. A lot of claims are natural causes, storm-related.

1 Q. Okay. But that, I think you said, is something you all
2 check off or look at at everything that you investigate?

3 A. Yes.

4 Q. All right. Now, do you have any experience in fire
5 investigation?

6 A. Just the experience that I have gained in working claims,
7 working fire claims. I've also had training by the company and
8 attended seminars, just that nature.

9 Q. Have you ever testified as an expert in fire cause and
10 origin?

11 A. No, I have not.

12 Q. Okay. Are you aware or do you agree that the scene of the
13 incident, it's important to keep its integrity when you're
14 investigating a fire or something like that?

15 A. Yes.

16 Q. Okay. And you've known that, I assume, for a number of
17 years?

18 A. Yes.

19 Q. Okay. Now, during the normal, ordinary course of an
20 incident like the [REDACTED] incident, do you keep a file or
21 accumulate records?

22 A. Yes.

23 Q. And is that something that you do in every fire
24 investigation or every claim that you get?

25 A. Yes.

1 ask you, first of all, do you recognize those photographs?

2 A. Yes, I do.

3 Q. Did you take those photographs?

4 A. Yes, sir, I did.

5 Q. Got your name down at the bottom of the sheet?

6 A. (The witness nodded.)

7 Q. Does that have a date on it that would refresh your memory
8 about when you went to the property?

9 A. I put down that the date taken was October 10, 1995, so I
10 would say that's when I was there.

11 Q. Okay. All right. Now, did you go by yourself to the
12 scene?

13 A. Yes.

14 Q. And what did you do when you got there?

15 A. I conducted the investigation. I also did a witness
16 canvass.

17 Q. Okay. About what time did you get there?

18 A. I just recall it was in the morning, that morning.

19 Q. You said you did your investigation. That's pretty broad.
20 What did you do in your investigation?

21 A. Generally, and of course, I was -- the estimate notes that
22 I made were on the house next door.

23 Q. Right.

24 A. Or the house we insured. I'm sorry.

25 Q. Right.

1 cause and origin investigator to come and make that
2 determination.

3 Q. Would you have done that the same day that you did your
4 inspection?

5 A. Not necessarily.

6 Q. Do you remember if you did?

7 A. No, sir, I don't.

8 Q. Okay. Would you have noted that in your file?

9 A. Yes, sir.

10 Q. And wherever the file is, that should be in your file?

11 A. Yes, sir.

12 Q. Okay. Does your company have a system, either interoffice
13 or a database, that you can check for problems or recalls with a
14 particular product? For instance, a Lincoln, Ford Lincoln, if
15 you have a claim that involves a Ford Lincoln, do you have a
16 database that you can access to see if there are problems or
17 recalls with it?

18 A. No, sir, not to my knowledge.

19 Q. To your knowledge, no database was accessed through your
20 office to try to determine if there were any problems or recalls
21 with the vehicle in the Wycoff case?

22 A. That's correct.

23 Q. Okay. All right. After you made your recommendation, what
24 was the next thing that you did in this case?

25 A. I did call and speak with Mr. Richard Walls, the adjuster

1 who inspected the property next door to the property we insured.

2 Q. When did you call him?

3 A. I do not remember.

4 Q. Okay. What did you say when you talked to him, or what was
5 said?

6 A. It was a discussion about the fire scene, the fire loss. I
7 believe I asked him what his opinion was as to what occurred.
8 And then I talked with him about what I thought. And that was
9 basically what the conversation involved.

10 Q. What did he say his opinion was about the fire?

11 A. He felt like that it originated from the -- it was an
12 electrical problem with the home, with the house itself.

13 Q. Okay. Did he express any other opinions to you about the
14 fire at that point?

15 A. We talked about some other possibilities that it could have
16 been, but he said that he felt like in his opinion it was the
17 electrical of the house.

18 Q. Okay. He was pretty adamant about his opinion in that
19 respect?

20 A. I believe that was pretty much his opinion, yes, sir.

21 Q. Okay. All right. What did you do after you had that
22 discussion with Mr. Walls?

23 A. I believe after I spoke with Mr. Walls, I called Jim Swain
24 and asked him to give me his opinion as to what the cause and
25 origin of the loss was.

1 determined --

2 Q. Okay.

3 A. -- in the investigation. And yes, as far as I know, there
4 was a -- they were going to pursue subrogation.

5 Q. All right. Is there an agreement between Allstate and
6 Columbia about the subrogation and who's going to pay for what
7 and how it's going to be handled?

8 A. I do not know details about that, no, sir.

9 Q. Do you know if --

10 A. I mean, I don't know.

11 Q. Do you know if an agreement such as that exists?

12 A. I believe I recall that at some point in time I asked them
13 to submit the costs.

14 Q. Asked who?

15 A. I believe Richard Walls, when I left him the -- I think I
16 left him a message that I did ask him to share in the expenses.

17 Q. In exchange for what, if anything?

18 A. Well, if we were going to jointly pursue subrogation, I
19 asked him to share or their company to share in expenses with
20 ours. I'm pretty sure I remember doing that.

21 Q. Did he agree to do that?

22 A. Yes.

23 Q. Is there any written document setting out what your
24 agreement is?

25 A. No, sir, not to my knowledge.

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

Plaintiff,

v.
FORD MOTOR COMPANY,
Defendant.

APPROVED BY JAMES SWART
Date: 18 Little Rock, Arkansas
August 27, 1968

APPEARANCES

FOR THE PLAINTIFF: Beckley, Swartz, Beckett & Elling, P.C.
200 First Commercial Building
200 West Capital Avenue
Little Rock, Arkansas 72203
By: Robert E. Beckley, Esq.
John S. Swartz, Esq.

FOR THE DEFENDANT: Wright, Lindsey & Jennings
200 West Capital Avenue
Little Rock, Arkansas 72203
By: Harry J. Hallinan, Esq.

DEB PRESENT: Jim T. Stiles, P.C.

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EXHIBITS:

Marked for Identification

Exhibit 1	Exhibit 2	Exhibit 3
Exhibit 4	Exhibit 5	Exhibit 6
Exhibit 7	Exhibit 8	Exhibit 9
Exhibit 10	Exhibit 11	Exhibit 12
Exhibit 13	Exhibit 14	Exhibit 15

EXHIBIT

E

STIPULATIONS

JAMES SWART has protocol, sworn and deposed in the office of Beckley, Swartz, Beckett & Elling, 200 First Commercial Building, Little Rock, Arkansas, commencing at 10:00 a.m., as follows: On Thursday, August 27, 1968, the witness having been first duly sworn to testify as to the truth of facts the witness herein certifies: said deposition being taken according to the terms and provisions of the Federal Rules of Civil Procedure, at the instance of counsel for defendant.

It is hereby stipulated and agreed by and between counsel for the parties that all forms and formalities as to the taking of said deposition in this action is set aside; however, the right to object to the taking of the witness as to the grounds of competency, relevance and materiality is expressly reserved, other than as to the form of questions as proposed to the witness, and may be hereinafter asserted if and when prompted at the trial of this cause without the necessity of action even at the time of taking of said deposition.

PLAICER DIRECTIONS

Thereupon,

JAMES SWART

having been called for examination by counsel for defendant, and having been first duly sworn by the undersigned notary public, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR DEFENDANT

BY MR. HALLINAN:

Q Mr. Swartz, did you not receive the notice of deposition that I filed in this case?

A Yesterday evening late unfortunately. I know it must have went to Atlanta and by the time it got back to me, I was kind of out of the proper sequence to set the information you needed.

Q Can you tell us -- let me just make this Exhibit 1 to the deposition, the Notice To Take Deposition Upon Oral Examination. Would you just tell us which things you weren't able to get for the deposition?

A Well, I brought up report and that's all I've been able to get. I can do over such thing. I don't have any accident or investigative reports concerning injuries. I don't have any of that. Drawings and written materials, I've brought that.

Q Then you say you brought that, you brought everything that you've called upon?

A Yes.

EA62-629 57327

1 A Well, one time, I used it to determine how some fires in
2 houses had been —
3 Q Okay.
4 A — dealing with no arson investigation.
5 Q Can you also determine how many fires have been reported
6 in a particular — say, for instance, a vehicle?
7 A Type of vehicle?
8 Q Yes, sir.
9 A I believe that information is contained therein.
10 Q Is the PILEUP?
11 A Yes, sir.
12 Q Did you accept that in this case?
13 A No.
14 Q In your knowledge, did anybody?
15 A No.
16 Q Are anyone told you that they assumed that we found one
17 third or mother in regard to this vehicle in this case?
18 A No.
19 Q And you stayed with DBS Investigations from '92 to '97?
20 A Yes. Five years and two months and during that time, I
21 attended meetings, usually 40-hour meetings sponsored by the
22 International Association of Arson Investigators and the
23 International chapter has local chapters, in other words, state
24 chapters and I've attended chapters here in Arkansas, chapter
25 conferences in Tennessee and Mississippi.

1 Q Are you as now connected to that organization?
2 A No, sir.
3 Q Have you ever been?
4 A No, sir.
5 Q And I may have cut you off earlier on the various city
6 insurance companies ask for cause and where experts. Now I
7 don't, but I recall you giving me two explanations. If there
8 were any others, I'm giving you the opportunity now to tell me
9 what the other one is because I frankly don't recall whether
10 you said two or three.
11 A Okay. I covered underwriting and products. The third
12 would be if there are suspicious circumstances and those could
13 be varied, but if there are suspicious circumstances, they are
14 called for an investigation to determine whether or not it's an
15 incendiary fire.
16 Q Is arson?
17 A Yes, sir.
18 Q Then you left DBS Investigations, you went to MSI, Inc.?
19 A Systems Engineering Associates. They're based out of
20 Columbus, Ohio and they opened an office in Memphis and hired
21 me to operate that office.
22 Q One last question on DBS. How many fires did you
23 investigate during the time approximately?
24 A Probably 150 to 200.
25 Q Were those actual on-the-scene inspections?

1 A Yes.
2 Q Every one of them?
3 A That.
4 Q Okay.
5 A No, they are not home base where the vehicle located, but
6 it was a hands-on inspection of the vehicle itself. The
7 vehicle may have been taken from the roadway or the roadside or
8 the field or things of that nature, but each and every one was
9 a hands-on inspection of the vehicle itself.
10 Q Is it important to do a scene investigation when a fire
11 has occurred?
12 A Yes, sir.
13 Q Are important to them?
14 A Well, I don't know how to stress that or what ratio is
15 safe that, but I think the investigator that has the —
16 opportunity to investigate sooner the incident, the better he
17 has information or can at least observe and find and judge
18 the best source of the fire, observe the best physical evidence
19 regarding fire pattern and condition, establish trace evidence,
20 and I mean that's assuming that the fire scene is as it
21 was immediately after the fire.
22 A Correct.
23 Q If you set there after the scene is cleaned, this it's not
24 necessarily as helpful. Is that a fair statement?
25 A Yes, sir.

1 Q Now, you, too, you said you were asked to head that
2 investigation?
3 A No, sir. No, sir. Just operate the Memphis office. That
4 time as a fire investigator and to spend an office with a
5 secretary. At one time, as fast as many as three engineers in
6 that office.
7 Q What what type of work did you, Inc. do?
8 A They handled it liability disputes. Most of their work came
9 from manufacturers and attorneys and insurance carriers.
10 Probably 80 to 90 percent of their work was for manufacturers.
11 A And the other 10 to 20 percent was from —
12 A Municipalities, individuals, attorneys, insurance
13 companies.
14 Q Did you do the actual hands-on work at this office?
15 A Yes. I — most of the clients that I had worked for when
16 I was with DBS continued to use me with that facility and
17 again, I would focus my fire investigations of structural
18 fires and vehicle fires and equipment fires.
19 A Were any of the clients — well, let me restate that. Was
20 Allstate Insurance Company or Colonial Insurance Company one of
21 the clients that came with you from DBS?
22 A Possibly Allstate did. To my knowledge, I've never worked
23 for Colonial.
24 Q Now long, as you sit here today, have you been working
25 with Allstate Insurance Company?

there might be a class spot there where the east and westing around it or the smoke. I saw nothing, yes sir, based upon at that time about 10-and-a-half, 12 years of experience to indicate to me that the area of origin had been altered and that was up primary concern.

Q. Then did you determine the area of origin?

A. Probably by now, somewhere along that line, 10:00 o'clock

at least, I felt confident I could have put an area.

Q. And were talking about on the 10th?

A. Yes, sir.

Q. But before you knew the area of origin, wouldn't you look at all of the area where you saw fire?

A. Oh, yes. Like I said, several things had been noted inside the Uscoff's residence and I assumed, first of all, Mr. Cunningham's residence and interpreted the patterns again and again, that was a rental house. The contents -- I can't specifically recall any notable piece of content that was left in there, maybe a broom or a mop, something along that line. Everything had been removed from that house.

Q. In the apartment area, are you able to say without any question that Richard Hall didn't do anything else to that area to distort the scene other than remove the items?

A. No.

Q. Can't say that?

A. No. It didn't occur to me, but, you know, I'm not going to

testify that he thought the fire started in the Uscoff residence area?

A. I'm not going to sit here and talk like I can remember his exact words. The point that I recall was that he felt like it had started outside Mr. Cunningham's residence but in the Uscoff's structure or curveto area and had extended to the area onto the exterior of Mr. Cunningham's house.

Q. Did he indicate to you that the fire had started in the vehicle?

A. No.

Q. -- or that he suspected that it had?

A. No, I have no recollection of that.

Q. That he caused you to check that area?

A. No.

Q. You said that the Cunningham residence was occupied by Jeff and Diane Berry. Do you see that information?

A. Probably from Mr. Stilman.

Q. Did you ever talk to Jeff and Diane Berry?

A. No, sir.

Q. Did you interview Jerry Berrelson?

A. I don't recall that name. That's why I'm trying to look through here.

Q. Have you seen or reviewed any depositions in this case?

A. No.

Q. Well, let me tell you that Mr. Berrelson, I believe, is just a person who lived across the street from the Uscoffs. I

Q. Now there's not a possibility, do you?

A. It's a big fire scene. I mean it would be sufficient to a test for every piece of evidence that's there. Is that a fair statement?

A. I don't know that I would see the test evidence, but every item that was there, I'll say that.

Q. Did you determine that Mr. Hall conducted his inspection of the scene? It was in your report October 9th.

A. I think it was during the week of October 9th. Mr. Uscoff again would have been the one that told me what day he was there and as a matter of fact, he provided me with his card, I believe, to me for the phone call.

Q. Do you know, did anyone else look at the scene other than Mr. Uscoff or his family members and Mr. Hall prior to your inspection of the scene?

A. Not to my knowledge.

Q. And that's James or what?

A. I'm sorry. Mr. Stilman would have been to the scene obviously.

Q. You say "obviously." What is that?

A. Well, typically, after they get a report of a fire or smoke, wind damage, whatever it is, they -- the adjusters tend to get out there fairly promptly to make an assessment and in this instance, he indicated that he had been to the fire scene.

Q. Did he indicate to you -- I don't know what he indicated

but I believe that he said that there were some explosives in this fire or during the course of the fire.

Q. That's your opinion. In regard to whether or not this fire would have produced or been caused by an explosion?

A. Well, I mean at this point, you know, I feel that the fire was caused by the car.

Q. Right. And I said produced or caused by?

A. The explosives were produced or caused by?

A. You.

A. That's kind of where I'm going here. The car is sort of I think it has several components which are capable of exploding under pressure of a fire, those being the shocks or the suspension and the tires.

Q. Did you find evidence of any explosion in the shocks, tires or anything in the car?

A. Of course, rupture which would have caused a fuel tank not may have been perceived as an explosion, but, by the nature and time.

Q. Did you find that?

A. Yes.

Q. Did you document that somewhere?

A. Pretty much the vehicle itself documents that.

A. Show me where it documents it.

A. That would be in the photographs perhaps or markings at the vehicle itself. The shocks themselves are all rather

- 1 A Not to my knowledge.
 2 Q Any other components that could explode during the course
 3 of a fire?
 4 A Well, since possibility of the fuel tank, they under
 5 certain circumstances can explode.
 6 Q Did the fuel tank explode in this case?
 7 A I see no evidence of an explosion of a fuel tank.
 8 Q Any other components that could explode in this vehicle
 9 during the course of a fire?
 10 A The air bag. That's all I can think of.
 11 Q Did the air bag explode or was air bag deployed in the
 12 vehicle in this case?
 13 A I don't have a recollection at this instance if it did or
 14 not.
 15 Q Tell me what your opinion is about the origin and cause of
 16 this fire or explosions, if you have them.
 17 A I feel that the vehicle that was parked under the carport
 18 at Mr. Updoff's residence was the origin of the fire and
 19 specifically, that the fire originated under the engine
 20 compartment and extended out from within that compartment and
 21 attached surrounding combustibles.
 22 Q Any other opinions about the cause and origin?
 23 A Well, the fire patterns document fire origination in the
 24 area of the right front section of the engine compartment where
 25 a power module was located and that particular unit in this

- 51 S It doesn't matter. That would be fine.
 52 Q What does Photograph No. 5 is the Report No. 1 tell us?
 53 A Well, I'm probably standing in the northeast corner of Mr.
 54 Updoff's yard, looking northwest toward the carport area of
 55 Mr. Updoff's residence and this shows his garage and part of
 56 his utility room and might mention the front of his house,
 57 we've got structural collapse of the carport.
 58 In this instance, the carport runs longitudinally in an
 59 east-west direction and is located at the south end of Mr.
 60 Updoff's house. The vehicle is parked approximately three
 61 quarter length under that carport and the roof of the carport
 62 immediately above the engine compartment of the vehicle is
 63 fairly destroyed, the wooden structural components broken up
 64 by the collapse, jets and roof deteriorate.
 65 Q Is it important to see this scene as it was immediately
 66 after the fire to be able to Photograph No. 5 in order to draw
 67 that type of conclusion?
 68 A Yes, sir.
 69 Q And it's hard to talk from this photograph, but as I
 70 understand, there was more debris on the north end of the south
 71 exterior wall of the garage, is that right?
 72 A Yes, sir.
 73 Q That's in the same area where the middle of the collapse
 74 is and where the right front header of the car was so that
 75 point? Is that correct?

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 1 vehicle has damaged in just instances to a greater extent than
 2 other recipient.
 3 Q Any other opinions?
 4 A I can't think of any right now.
 5 Q Are you going to express any opinions other than cause and
 6 origin opinions in this case?
 7 A No.
 8 Q So when I ask you all of your opinions that you're going
 9 to express in this case, they're basically those tie with
 10 whatever supporting facts or links with them?
 11 A Yes, sir.
 12 Q Let's talk about your basis for the first opinion, that
 13 the vehicle was the origin of the fire. Give me all the bases
 14 for that opinion.
 15 A Depth of char to wooden structural components within the
 16 carport.
 17 Q Now, as we go along, I would like for you to show me
 18 photographs, if you have them, to depict the bases that you're
 19 going to provide me, okay?
 20 A All right.
 21 Q Okay.
 22 A Beginning with No. 5 in Report No. 1.
 23 Q Can I come around there?
 24 A Sure. You want me to turn it around to see?
 25 Q Whatever is easiest.

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 1 A ... "Some debris," now, would you clarify that?
 2 Q Okay. Maybe I'm wrong, but I thought that there was
 3 debris, stored materials in the open carport —
 4 A Okay.
 5 — above the south exterior wall.
 6 Q I understand what you're talking about now, the stored
 7 materials. Now, there were stored materials on the outside of
 8 the north wall of the house, which was the north wall of the
 9 carport.
 10 Q Right. And isn't that in the same vicinity where the
 11 right front header of the car was?
 12 A Correct.
 13 Q Now, if you had a fire that originated in that area,
 14 wouldn't the scene be the same that we see in Photograph No. 5?
 15 A Possibly with that photograph alone, yes.
 16 Q I see in Photograph No. 5 — and maybe I'm mistaken, but
 17 is this — I don't see any shingles in the right front part of
 18 the car. Has the roof been removed in that photograph?
 19 A No. It was destroyed by the fire.
 20 Q This portion that I see in Photograph No. 5, was that
 21 portion been removed?
 22 A No.
 23 Q Has it remained during the course of your investigation?
 24 A Yes.
 25 Q Then was it removed? Let me try to make it short.

- 1 A Not October the 16th.
 2 Q Are 11-07 your second —
 3 A October 20th.
 4 Q And was authorization that permission to be removed?
 5 A Mr. Neff.
 6 Q You said depth of the char and when I asked you to give me the basis for that opinion, you showed me Photograph No. 5. Is that what you mean by depth of the char?
 7 A No. That was one thing that I indicated. I indicated, you know, characteristics of various structural materials. So I must probably answer that:
 8 Q Composition of wood —
 9 A Wood structural materials.
 10 Q Now as the depth of the char that you've talked about, do that the record is clear, the photograph that you've just talked about, Photograph No. 5, see Fire Report No. 1, which is Exhibit No. 3.
 11 A Okay. In the case report, Report No. 1, Photograph 2 and 6.
 12 Q What do you mean by depth of the char and how does that tell you where the cause and origin of the fire was?
 13 A Well, fire is going to burn longer where it starts.
 14 That's just sort of a commonly used tool of fire investigation, that it will burn longer where it starts because that's where it starts. If you light one end of a log, that end is going to

- 1 A Set everything in this photograph. Perhaps that you part,
 2 Set there are other parts of the photograph that would lead
 3 elsewhere.
 4 Q And what other parts are those?
 5 A This is part of the roof that you noted about earlier of
 6 the carport that's beyond this.
 7 Q Yeah.
 8 A And it terminates here at the front of the windshield and
 9 it's pretty much destroyed over the engine compartment.
 10 Continue that with oxidative patterns on the vehicle's framing
 11 members, fenders, cross members, tires — not tires, but shade
 12 and such. We've got a distinct area of greater oxidation and
 13 distortion to the metals as compared with other sections of the
 14 vehicle.
 15 Q Okay.
 16 A And again, the composition of the roof immediately above
 17 the engine hood.
 18 Q Assuming that the fire started along this north wall and
 19 extended to the vehicle and involved the vehicle and the engine
 20 compartment, would you expect — would this photograph be
 21 consistent with that assumption?
 22 A No, sir. I don't believe that.
 23 Q Why not?
 24 A I believe that this shows a lesser burning than
 25 immediately above the vehicle where over here where there's

- 1 Burn longer than the other end. It takes while for the fire
 2 to get there.
 3 In this instance, we've got 51 feet on the wooden
 4 structural members and this is adjacent to the vehicle. This
 5 is on the outside of the south wall to the Neff residence
 6 that's adjacent to the right front fender.
 7 Q Let me interrupt you as the record can be clear. You're
 8 pointing to Photograph No. 7 in Exhibit No. 3, right?
 9 A Yes.
 10 Q And just on the report will bear it out, would you circle
 11 the area that you just referred to with that red pen if it will
 12 show?
 13 A I don't know if I -- can I just or allow to it is that
 14 what?
 15 A Whatever.
 16 A That area and accompanying this area. Can you see that?
 17 Q Sure. Again, that shows what?
 18 A Well, that's one indication of an area of origin.
 19 Q And that's because that it's the most charred area?
 20 A One of the greater charred areas.
 21 Q Now, again, I'll ask you that same question that I did in
 22 the last one, assuming the fire started along that wall just
 23 below the area that you've pointed to with this red pen, would
 24 the evidence be the same to refer to the cause and origin?
 25 Would this photograph support that as a cause and origin?

- 1 still some wall remaining left.
 2 Q Circle on Photograph No. 7 the part that you said
 3 evidenced a lesser burning time.
 4 A (Indicates location.)
 5 A Now, we're talking about metal and wood, metal in the car
 6 and wood in the house?
 7 A Correct.
 8 Q And you're saying that the metal, the burn patterns on the
 9 metal evidence a lesser burn than the wood on the house? In
 10 that what you're saying?
 11 A Not exactly, no. The metal carries its own oxidation
 12 patterns, which is an etching and a rusting effect, and the
 13 wood itself is either charred or charred. In this instance,
 14 the wood itself here is charred, but it's destroyed immediately
 15 above here. It's still somewhat intact over above the south
 16 wall but destroyed above the body of the vehicle.
 17 Q Okay.
 18 A So, in other words, it burned longer at the vehicle and
 19 extended up and burned longer is that section of the house than
 20 it did in the south wall.
 21 Q Are there components in the vehicle that would by the
 22 nature of their composition burn longer than wood?
 23 A I think that would probably be a question for a chemist or
 24 a scientist. I don't specifically have an answer to that.
 25 Q Okay. Are other photographs that show the depth of the

1. clear that you've talked about? The said 7. No, sir, as I
2. A. Well, we've got the rear interior ceiling down over the
3. back and passenger compartment of the vehicle and then it's
4. just destroyed above the top part —
5. Q. Okay.
6. A. -- of the engine hood.
7. Q. Is there any road above the area that I've described to
8. you where the debris rest? Is there any roof above that?
9. A. No. You know, there are other red top parts scattered, but
10. no roof there.
11. Q. So if there was a roof above that area, then it's
12. completely consumed or not?
13. A. Correct.
14. Q. Okay.
15. A. Well, I don't believe that any of it is completely
16. consumed, but it's reduced to small bits and pieces of char.
17. Q. Right. In that char in bits and pieces
18. I measure here, you can see lying about the vehicle and on
19. the floor.
20. Q. Had you've pointed first at Photograph No. 87
21. A. Uh-huh.
22. Q. Just above where it says more evidence in this
23. photograph or at least more evidence?
24. A. Right. You can see pieces of charred debris laid out on
25. the floor around the vehicle.

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1. Q. Did you look at this debris that we see in Photograph No.
2. 87 and 88, circle just as we know that were taking out.
3. Did you look at this debris that I've circled in Photograph No.
4. 88 like you saw at the scene?
5. A. Yes, sir. A lot of it, I placed there.
6. Q. When you say you placed there, what do you mean?
7. A. Shoveled it from the carport area free-around the vehicle
8. and placed it to the outer-shade away from the vehicle.
9. Q. Why did you do that?
10. A. To protect the vehicle itself. Before moving the debris, I
11. examined those individual components and there were remains of
12. clothing, surfboard box materials, leather or that nature along
13. this section.
14. Q. Where?
15. A. Along that outside wall where you first referred to it as
16. debris, but it's actually stored materials.
17. Q. And those materials, when you got to the scene, were under
18. what I've circled in Photograph No. 87.
19. A. Probably not under a lot of it at that time. When I first
20. got there, they were somewhat exposed. Some debris was lying
21. on it, but I added more to it by shoveling around the car.
22. Q. Did you take a photograph of that area, what it looked
23. like before you shoveled it?
24. A. No, sir. You can still see pieces of clothing articles, the
25. color red is there still intact before I pulled it from the

1. debris. This is a piece of the roof that completely done.
2. This is the piece of the roof that came directly free from the
3. edge of the house.
4. Q. Let me catch up with you here. Circle this portion as
5. Photograph No. 8 that you say is a piece of the roof.
6. A. Let me see if this works one better. Does that work any
7. better?
8. Q. Not to me.
9. A. Okay. Okay.
10. Q. Do you have a blue dot?
11. A. I've got this. Try that.
12. A. That particular piece is this photograph right here —
13. Q. That's estimate. See the layer of the shingles, shingle
14. material and this is a piece of the framing layer down here,
15. that shingle area, that's the framing.
16. Q. Would you draw a line with that blue pen on it to show what
17. you're talking about?
18. A. I don't know if that's going to show up.
19. Q. You've written "road" out at the end of an arrow.
20. A. Right.
21. Q. And that depicts the roof that you say that came from
22. the roof?
23. A. It's either a rotted or a joint component that was lying
24. down, the base, in front of the vehicle further away from the
25. vehicle. In other words, here is no area with some structure

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1. materials pulled up roof and then here is some other roof
2. material, but yet, laying directly and immediately on the
3. material are only small bits and pieces of the roof.
4. Q. Now, does Photograph No. 8 depict exactly the way the
5. debris looked when you arrived?
6. A. Yes, sir -- well, no, sir; no, sir.
7. Q. Okay.
8. A. This is after I had dug along this area here, you know, I
9. dug a little, three times has to pull through the debris and
10. look and in this instance, you know, looking to see that that
11. was clean there.
12. Q. Do that you're clear on the record what you were talking
13. about, it's just down yours you've put a blue dot on
14. Photograph No. 8. Is that right?
15. A. Yes, sir.
16. Q. Now, do you have a photograph of the area of it located
17. when you first got there, before you did any digging or picking
18. up whatever you'd find?
19. A. No, sir. Probably No. 8, 9, 10, those are going to be the
20. closest ones to those areas about that.
21. Q. Just they don't show close-up of that same area, do they?
22. A. No.
23. Q. They don't show that area at all, 8 and 9?
24. A. Well, the shingles area. There could have been some
25. debris shown in this area, right.

Q I've told you about right up there by the right front part of the car.
A Well, this -- no.
Q Do you didn't take any photographs of the right front area of the car as you found it when you first arrived?
A I'd taken photos right to side.
Q You're stating your hand?
A No, sir, no, sir.
Q Now, you said you picked around with a torch -- what did you find?
A A little later this morning.
Q Okay. And what were you doing that for?
A Just to see the layers of what the combustible material was along this wall because there again, this is an arm of house because and I wanted to see what was there to serve as a fuel source.
Q Did you find anything?
A Yes.
Q What did you find?
A Paper, clothes, cardboard boxes, pieces of wood from furniture, things of that nature.
Q Did you document anywhere everything that you found there?
A That's contained in the report.
Q Where is it contained? Is that Page 3, Paragraph 17?
A In which report?

Q First report.
A Yes, sir.
Q The second sentence --
A Yes, sir.
Q -- where it says "Items included bags of clothing, either fertilizer and cardboard boxes containing books and school supplies items" --
A Yes, sir.
Q -- is that an all-inclusive list of what you found?
A No, sir. There were other things there.
Q Okay. You don't recall what those were?
A I remember a lamp. That's about the only other thing I recall, there was a lamp out there.
Q Did you photograph any of that material?
A No, sir. I just, you know, documented in the report as being there to serve as a fuel source.
Q So what did you do with that material after you documented it?
A I'm sure that I burned, you know, some of it as I looked through the debris.
Q Shoveled it, meant what?
A Just that.
Q Put it in a trash can or --
A No, sir. I would have probably moved it further out into areas of less damage, you know, farther from areas of least to

nearest damage. Like up out in the area of the heaviest damage, then we take those elements of debris and separate them individually and place them outside so we can inspect the floor or the lower part of a deck or whatever it is before we're finished with it. Do you have me photograph depicting those three after you shoveled them in whatever pile you put them in?
A No, sir. I recall where I put them, but I didn't take a photograph of where I put them.
Q Where did you set them?
A In that breezeway between the utility room and the house, the northeast corner of the house, and these were placed outside the carpet on the ground between the Contractor's residence and the Sheriff's residence.
Q I take it that one of your objectives in this case is to free the fire spread from the car to the house?
A Yes, sir.
Q And there has to be some sort of path, does there not, from the fire to go from the car to the house?
A Yes, sir.
Q And was that path evidenced on the floor? Were any of the materials between the car and the house?
A I take that the bare patterns, you know, show that path. I don't distinctly recall anything on the floor that would show that.
Q Did you take any photographs of the floor after you

removed the debris to show whether there were or were not paths of that nature?
A Yes, sir, there are areas where, you know, the area around the floor of the car, but there are no --
Q Which photographs are you talking about?
A In Report No. 4, 7 and 8.
Q Photographs 7 and 8? Yes, those show primarily the engine compartment of the car, do they not?
A Well, parts set to realize, you know, they show the outer edge around the car, too. They show the floor of the carpet around the outer edge.
Q Do they show the entire area between the car and the north wall of the house?
A Probably No. 10 comes close to that in Report No. 2.
Q Comes close, but down it completely do 11?
A No.
Q Is that a close-up photograph of the floor is that area?
A No, sir.
Q Yes.
A No.
Q And I can't tell from here. If I can glance at it real quick, was that before or after the debris was removed between the house and the car?
A Probably before.
Q Did you take any photographs with the specific intent to

1 down fire stove. As the temperatures were extremely above at
2 ceiling level and not down low, the thermal rise of heat, heat
3 rises and whatnot.
4 Q. You look up see the wires when it dropped them copper
5 splatters down? Do you have an opinion?
6 A. Most probably from, you know, ceiling level. Now, as far
7 as the metal structure; nothing had occurred at this point, I
8 don't have an opinion of that.
9 Q. And we were talking about the portions of the copper
10 wiring that went to the light fixture and I asked you about the
11 photograph of that wiring. Do you have any photographs of the
12 wiring? You said you found metal insulation?
13 A. No, sir. I didn't take any. I noted them. In considering
14 your previous question though, I think we can make an accurate
15 assumption that the copper wire is still intact in the engine
16 compartment at a stagger level on the fender. Therefore,
17 whenever the copper wire to the light fixture was located, it
18 had to be above that area and, therefore, in a higher
19 temperature range, as were probably this net, you know, is
20 either a full upright position or very near there.
21 Q. If the fire started in the area that I've described to you
22 on the north wall of the house exterior to the vehicle and
23 caused that wall to burn and the ceiling to catch, would you
24 expect to find that as one in Paragraph No. 127. Would that be
25 normal or inconsistent?

1 A. ...That single factor?
2 Q. Yes.
3 A. No.
4 Q. Would not be inconsistent?
5 A. It's difficult for us to say because I see the totality of
6 the materials that I looked at and, you know, I don't find that
7 that's what happened.
8 Q. I understand.
9 A. I just -- as it's difficult for us to say that that -- you
10 know, that that's a factor or that that did happen. I believe
11 there's -- I don't believe that it could have happened that way
12 because there's too much wooden structural materials and too
13 much of that, as you turned it, debris and I said stored
14 materials remaining for that to have happened in that
15 sequence.
16 In other words, I think the car was already burning and
17 some of the wooden materials, by the wall -- there's still --
18 a lot of that wall is still left. It's not nearly as badly
19 charred as those parts that are now free the roof and ceiling
20 above the car. There's still things left and if we took this
21 sheet of paper and we lit this corner -- I say this analogy --
22 we kind of tried to put the fire out. Of the four corners, the
23 one that we'll could be burned the worse. So hand says that,
24 you know, there's, the fire is burning over and free that wall
25 and not at that wall.

1 Q. Do you have an opinion about how long the fire existed,
2 if you will, before it involved anything beyond the car?
3 A. No, sir. I don't think so.
4 Q. Don't have any cause or any opinion at all?
5 A. No, sir.
6 Q. Illustration of other cases, what else?
7 A. Well, I don't think I could illustrate Mr. Chapman's
8 home by the fact that it was burned on the exterior in a
9 greater extent on the right side than the left side. The right-hand-side
10 outside of the north end and I believe that Chapman's, the
11 exterior area of his house could be of basically propane, the
12 propane and propane in that area because there
13 relative composition after the fire. They didn't reflect over
14 the damage as depicted out in the exterior area.
15 Q. Do you have a photograph depicting that, the propane in
16 the kitchen area?
17 A. I don't have one, but I would expect that the liquid propane
18 justify that there may be more components that were not propane
19 in there. There are things that were referred to there.
20 Basically the fire was outside of that house and attacking the
21 outside jacket to the north wall.
22 Q. But you observed the surfaces in the kitchen area from
23 being a cause of this fire based on your inspection of
24 those --
25 A. Yes, sir.

1 Q. -- wrong? Did no photographs or any documentation of that
2 was made by you in that right?
3 A. No, sir. There's probably photographs made by the
4 officer that would show that, but I don't have them.
5 Q. What size did you estimate on a case?
6 A. Heating.
7 Q. And that would be cigarette smoking?
8 A. Yes, sir.
9 Q. How did you estimate that as a cause?
10 A. In talking with Mr. and Mrs. Higgin, she was very
11 consistent in stating that she smoked and used a pipe to get
12 her smoke in and the pipe was kept in like a cigarette in the
13 car and that each time after smoking, she would remove the
14 pipe from the car and take it inside to pack it for the next
15 time she would use it and she also stated she didn't smoke
16 when she arrived home the evening before the fire, the last
17 time the vehicle was known to have been driven.
18 Q. So your entire basis for concluding that as a cause was
19 your testimony or statement of Mr. Higgin?
20 A. Pretty as mud, you know, in looking at those components
21 along the north exterior side -- the exterior side of the north
22 wall, there was no deep wall pockets of burn down into these
23 like there would be if there had been a cigarette dropped in
24 there and smoldered, burns outward, plus she had placed those
25 components there several days before the fire.

100

101

- 1 100 with this particular case?
 2 Q No, in other similarities. The vehicle was sitting parked
 3 and it had been parked for sometime. It was not being operated
 4 at the time of the fire.
 5 Q Do you know if the power distribution center in the Ford
 6 Escort was the same as the one in this case?
 7 A No not. Just that the terms used upon service personnel
 8 that I spoke with at various Ford places, that's what they call
 9 it, is a power distribution panel.
 10 Q Is your opinion about the cause or origin of the fire in
 11 this case in any way based upon what you found in that Ford
 12 Escort case?
 13 A Well, I think it just reinforces the potential that it's a
 14 fire cause and that the fire patterns would have been very
 15 similar but that fire in the Escort continued --
 16 Q Okay.
 17 A -- you know, the patterns within the engine compartment.
 18 Q But it didn't, do you don't know if they would have been
 19 similar?
 20 A No.
 21 Q And what was the other case that you've talked about?
 22 A The other case was in another Lincoln -- I'm sorry -- a
 23 Mercury Marquis, Mercury Marquis.
 24 Q What year model?
 25 A '80, either '84 or '85.

102

103

- 1 Q And where was that case?
 2 A That was in Memphis. I was representing the homeowner who
 3 had rented the structure and the tenant was the owner of the
 4 vehicle and State Farm had the renter's insurance on the
 5 vehicle.
 6 Q You and you were representing the homeowner, the insurance
 7 company Fire --
 8 A That was a structure, yeah. I was representing the person
 9 that had the structure.
 10 Q What insurance company hired you to do that?
 11 A I believe that was an attorney for the homeowner.
 12 Q What did you find in that inspection?
 13 A That the fire originated in the area of the control module
 14 or power module rather within the engine compartment and burned
 15 the two-car garage and part of the residence.
 16 Q Were you deposed in that case?
 17 A No. I was told there was a settlement made.
 18 Q Did you give a report in that case?
 19 A I should have. I'm pretty certain I did.
 20 Q Do you intend to testify at all about this particular case
 21 in our case? You don't know probably.
 22 A Depends on who asks the question. I won't bring it up, I
 23 guess.
 24 Q Well, if there's any chance you're going to, I need to get
 25 a copy of that report you rendered in that case.

103

104

- 1 A You, sir --
 2 Q In Report No. 2, it says "I am awaiting copies of the
 3 transcribed statements from the Hyattire, witnesses and fire
 4 officials." Did you ever get those?
 5 A No, sir.
 6 Q Did you also obtain for repair orders and repair history.
 7 Did you ever get that?
 8 A No, sir.
 9 Q In your Report No. 1, you say "I recommend an electrical
 10 engineer be associated with the investigator and allowed to
 11 inspect the electrical components in the area of origin for the
 12 fire in an effort at documenting a malfunction towards
 13 mitigation." Does that mean trying to find out -- trying to
 14 build a case to negotiate and get money from someone else?
 15 A You, sir.
 16 Q Did this you further recommend that the vehicle be
 17 removed from the fire site and taken to a storage facility
 18 where it can be examined jointly by the fire investigator and
 19 electrical engineer in furtherance of the analysis?
 20 A Right.
 21 Q And the analysis meaning documenting a malfunction towards
 22 mitigation?
 23 A Well, toward determining the cause of the fire.
 24 Q I thought you had already done that.
 25 A I don't know that there's anybody that's holding up

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

[REDACTED] PLAINTIFFS

VS.

NO. J-C-97-421

FORD MOTOR COMPANY and
PANNELL MOTOR COMPANY, INC. D/B/A
PANNELL FORD-MERCURY, INC.

DEFENDANTS

AFFIDAVIT

I, Ralph Newell, state that the following facts are true and correct to the best of my knowledge:

1. I am a fire cause and origin expert. I was consulted by Ford Motor Company as a cause and origin expert in regard to the above referenced lawsuit. Attached as Exhibit "A" is a copy of my resume setting out my training and experience in the field of vehicle end-structure fires.
2. I have been qualified to give fire cause and origin testimony in courts in numerous jurisdictions throughout the country, all as listed in my attached resume.
3. I have reviewed the complaint, answer, responses to interrogatories, responses to requests for production of documents, all known photographs of the subject vehicle, all known photographs of the fire scene, all depositions that have been taken in this case, the home video of the fire scene taken by the Wycoffs and the reports rendered by Jim Swain and Joel Hicks.
4. I drove to Paragould, Arkansas on March 31, 1997 to inspect the 1994

EXHIBIT

F

Ford Lincoln Towncar VIN: 1LNLM82WORY720247. I would have inspected the fire scene if it had still been intact. At the time I learned of the fire, the fire scene had already been cleaned, the home had already been rebuilt and all evidentiary value of the fire scene had been compromised.

5. Attached as Exhibit "B" to this affidavit is the report (excluding attachments) of Jim Swain dated October 27, 1995. Attached as Exhibit "C" to this affidavit is the report (excluding attachments) of Jim Swain dated January 24, 1996. Mr. Swain concludes that the fire originated in the right front corner of the engine compartment of the vehicle. Mr. Swain states in his report that his conclusion is based, in part, upon his examination of the undisturbed fire scene.

6. I examined all of the photographs of the fire scene taken by Jim Swain. These photographs do not sufficiently document the fire scene to enable me to analyze for the cause and origin of the fire. Additionally, Mr. Swain acknowledges in his report that he failed to photograph the fire scene before he disturbed it.

7. Attached as Exhibit "D" are the only photographs taken of the fire scene before it was disturbed. These 6 (six) polaroids do not sufficiently document the fire scene to enable me to analyze the fire patterns and debris immediately following the fire.

8. I examined the home video of the fire scene taken by the Wycoffs. This video is of poor quality and fails to document the scene adequately to enable me to analyze the fire scene for cause and origin.

9. Because the entire fire scene, including the home, the debris, the fire

patterns and the position of the vehicle components, were all altered prior to my inspection of the vehicle, my ability to determine the cause or origin of this fire has been substantially impaired. The specific alterations that substantially impair my ability to analyze this fire, include:

a. **The debris.** I would need to inspect the debris described by the Wycoffs as having been stacked in the carport near the right front fender of the vehicle. I would need to determine the materials involved, the quantity of materials involved, the extent of their consumption by the fire, the existence of any fire patterns beneath, or relating to, the debris and the final resting-place of the debris following the fire. I would also want to examine this debris for the existence of igniters or accelerants. All of this information would assist me in determining the cause and origin of this fire.

b. **Fire patterns.** I would have examined the concrete slab, the carport walls and the storage room walls for fire patterns. None of these areas have been sufficiently documented. In fact, there are no depictions of the concrete slab or the lower portions of the walls. I would want to view these areas during removal of the fire debris. Fire patterns are crucial for determination of the direction and intensity of the fire flow.

c. **The home.** I would want to examine the home for any other causes of the fire. Specifically, I would examine the electrical power sources and attached fixtures for fire causes. I would want to examine any fire patterns existing in the home following the fire to determine the flow and intensity of the fire.

d. **Automobile components.** I would want to examine the components from the vehicle in exactly their final resting-places following the fire.

During my inspection of the vehicle I found several components out of place. I assume that these components were moved during the towing process.

10. FURTHER THE AFFIANT SAYETH NOT.

Ralph A. Newell
RALPH NEWELL

STATE OF Texas
COUNTY OF Dallas

SUBSCRIBED AND SWORN TO before me, a notary public, this

19TH day of February, 1999

Wray D Brown III
Notary Public

My Commission Expires:

04-02-02



1 IN THE UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF ARKANSAS
3 JONESBORO DIVISION

4 [REDACTED]

5 Plaintiff

6 vs. No. J-C-97-621

7 FORD MOTOR COMPANY

Defendant

8 * * * * *

9 The deposition of MILDRED L. WYCOFF taken
10 under oath pursuant to the Federal Rules of Civil
11 Procedure at 10:05 a.m. on the 15th day of April,
12 1998, at the Greene County Courthouse, Paragould,
13 Arkansas, before Kari R. Kelley, CCR, a notary public
14 and court reporter certified by the State of Arkansas
15 (License Certificate No. 552).

16

17

18

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21 *****

22

23

24

25

REGION REPORTING
P.O. Box 644
Jonesboro, Arkansas 72403
PH: (870) 931-4441

E982-825 57348



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(Witness sworn.)

1 called as a witness herein, having been first duly
 2 sworn, was examined and testified as follows:

EXAMINATION

BY MR. SALLINGS:

Q. [REDACTED] have you ever had your deposition
 taken before?

A. No, sir.

Q. Okay. Let me tell you a few rules that will
 make this easy to get through and make it easy on the
 court reporter, too. And Mr. Wycoff is in the room,
 and I would ask that he listen so we can proceed
 through this as quickly as possible.

This is a statement just as if you were in
 the courtroom under oath. And the main thing that you
 and I need to do is communicate. So if I ask a
 question that you don't understand, then let me know,
 and I'll stop and try to rephrase it or do whatever I
 can to help you understand.

Also, the court reporter is recording
 everything that we say. And it's very important that
 you give an oral response instead of a hand shake or
 an uh-huh or ah-ah, okay, because she can't pick that
 up very well.

Page 5	
1	The other thing is that if you will let me
2	finish my question, I will let you finish your answer
3	before I ask you another one. And that's also for the
4	court reporter's benefit. She can't write down what
5	two people are saying at the same time. Even though
6	you may know what I'm asking and may want to give me
7	that answer, let me finish if you would, okay?
8	A. (Indicating.)
9	Q. The other thing is this isn't an endurance test.
10	If you need to take a break for whatever reason, your
11	attorney is here and you want to talk with him, just
12	let me know, and we'll take a break, okay?
13	A. (Indicating.)
14	Q. All right. Give me your full name, please.
15	A. [REDACTED] It's really [REDACTED]
16	Q. [REDACTED]
17	A. But ever since I've been in school, they've
18	called me [REDACTED]
19	Q. Okay. What do you go by?
20	A. [REDACTED]
21	Q. [REDACTED]
22	A. [REDACTED]
23	Q. Is that yes?
24	A. Yes.
25	MR. SEXTON: If we can stop real

Page 6	
1	quick.
2	(Thereupon, an off-the-record
3	discussion was had.)
4	BY MR. SALLINGS:
5	Q. And, [REDACTED] hate to ask, but what is your
6	date of birth?
7	A. It is [REDACTED]
8	Q. Okay. [REDACTED] And your present address?
9	A. [REDACTED]
10	Q. That's Paragould?
11	A. Uh-huh, yes, sir.
12	Q. Are you on some medication this morning?
13	A. Yes, sir.
14	Q. I should have asked this at the beginning. It's
15	very important that I get your honest and best answer
16	today. So I need to ask you about the medication.
17	Can you tell me what it is that you are taking?
18	A. This morning, I mean, I have been — it's
19	prescribed by my psychiatrist.
20	Q. Do you know what the name of it is?
21	A. I take a half a BuSpar. And I take a Premar for
22	hot flashes.
23	Q. Premar?
24	A. Premar.
25	Q. Is that the name of the medication?

1 A Little cups at the place where we have coffee.
 2 Q And you fill them partially full of water?
 3 A (Indicating.)
 4 Q You are shaking your head?
 5 A Yes, sir.
 6 Q Okay. How tall are these cups?
 7 A (Indicating.)
 8 Q It looks to me like you've got two inches, maybe
 9 three inches tall, something like that?
 10 A Just -- it's just -- it's about as big around as
 this (indicating).
 11 Q You are pointing to the top of your Coke can?
 12 A Uh-huh, yes.
 13 Q What do you put them in when you are in the car?
 14 A It just sits in the can holder where the Coke
 goes.
 15 Q So there is a permanent Coke holder or drink
 holder in the car?
 16 A Two Coke holders.
 17 Q Okay. You have told me you don't recall whether
 you were smoking the night that you came back from
 P.T.O. Do you remember if you had that cup in your car
 then?
 18 A No, sir, I don't remember.
 19 Q Did you all have a covered garage at your house?

1 A We had a covered carport.
 2 Q Is that where you parked the car the night
 before the fire?
 3 A Yes, sir.
 4 Q And you don't remember for sure whether it was
 just you or you and your husband or you and someone
 else where you parked it, is that correct?
 5 A No, sir.
 6 Q That's not correct, or that is correct?
 7 A I don't remember if it was me.
 8 Q Okay. Now, during the time that this fire
 occurred, the night before, did you have any debris in
 your garage area, clothing?
 9 A Yes, sir.
 10 Q Wood?
 11 A Yes, sir.
 12 Q Paper?
 13 A (Indicating.)
 14 Q What did you have in your garage area, your
 carport area?
 15 A I had -- I had stuff in the garage area that I
 was getting ready for a garage sale.
 16 Q Garage sale?
 17 A (Indicating.)
 18 Q You need to speak up just a little bit if you

1 would.
 2 A A garage sale.
 3 Q What all would you have there? And I don't want
 you to list by item. But I am interested in was it a box of
 clothing, a box of cans, what?
 4 A Oh, I had some nice, nice, wicker coffee tables
 and end tables. And I had some good clothing and just
 miscellaneous items.
 5 Q Were you going to have the sale at your house?
 6 A Yes, sir.
 7 Q Was it going to be the next morning?
 8 A No, sir.
 9 Q When was it going to be?
 10 A I just was getting it -- I was just getting it
 out of my house and ready to tag it and everything and
 get it ready.
 11 Q Okay. You may or may not be an artist. You are
 bound to be better than I am. But I'd like for you,
 if you would, to draw for me your carport area and
 show me where the clothing and those items were located
 the carport area.
 12 A I'm not a very good artist, I can tell you for
 sure.
 13 Q I thought those pictures in your trunk would
 have been yours?

1 A We didn't neither one draw those. Now, here's
 the street.
 2 Q Now, you put "ST" for street. And that would be
 the front of your house, is that right?
 3 A Yes. (Indicating.)
 4 Q Now you have made it "street." I'm saying this
 for the record so they will know what's going on.
 5 A Okay. And then you go in this carport, and I
 had three steps up to the house.
 6 Q All right. You have made a little group of
 marks there to show the steps. Can you show -- let's
 see if we can get an east and west. If you are
 looking this way, what way are we looking?
 7 A You are looking east.
 8 Q So this would be east, is that right?
 9 A Uh-huh.
 10 Q Just the way I've marked it?
 11 A Uh-huh.
 12 Q Is that yes?
 13 A Yes.
 14 Q (Indicating.)
 15 A That's west.
 16 Q I'm going to make a little mark so we can know
 what we are doing here. And this would be south?
 17 A South.

**U. S. DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
JURISDICTION DIVISION**

[REDACTED]

Plaintiff,
v.
FORD MOTOR COMPANY,
Defendant.

**DEPOSITION OF E. LEO GOODMAN, P.C.
TAKEN IN LITTLE ROCK, ARKANSAS
FRIDAY, AUGUST 24, 1968**

APPENDICES

FOR THE PLAINTIFFS: Fuchs, Rosen, Roslett & Tilton, P.C.
200 First Commercial Building
One West Capitol Avenue
Little Rock, Arkansas 72201
By: ROBERT R. FUCHS, Esq.

FOR THE DEFENDANT: Urquhart, Lindberg & Johnson
One West Capitol Avenue
Suite 2000
Little Rock, Arkansas 72201
By: JERRY J. CALDWELL, Esq.

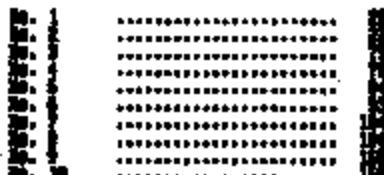
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EXHIBITS

Sorted for Identification:



(Exhibits listed separately)

EXHIBIT

H

STIPULATIONS

E. LEO GOODMAN, P.C. has produced, worn and exhibited in the office of Urquhart, Lindberg & Johnson, 200 West Capitol Avenue, Suite 2000, Little Rock, Arkansas, commencing at 9:00 a.m., on Friday, August 24, 1968, the witness herein was first duly sworn to testify as to the truth in response to the matters herein contained; said deposition being taken according to the terms and procedures of the Federal Rules of Civil Procedure, at the instance of counsel for plaintiff.

It is hereby stipulated and agreed by and between counsel for the parties that all forms and formalities as to the taking of said deposition in this action is set aside; however, the right to object to the testimony of the witness as to the grounds of competency, relevance and materiality is expressly reserved, other than as to the form of questions as proposed to the witness, and may be hereafter asserted if not then presented at the trial of this case without the necessity of setting aside at the time of taking of said deposition.

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PREDICTIONS

Q. Mr. Goodman, P.C., having been called for examination by counsel for plaintiff, and having been first duly sworn by the undersigned Notary Public, you consent and testify as follows:

STATEMENT BY COUNSEL FOR PLAINTIFF

Q. Mr. Goodman, will you please state your name for the record?

A. I go by Leo — that's my middle name — Goodman, G-O-O-D-M-A-N.

Q. Mr. Goodman, you understand that I'm the attorney for the plaintiff in this case?

A. Yes.

Q. I'm not your attorney?

A. That's correct.

Q. Well, I'm going to be asking you a few questions today. I am by hearing of your CD and other information you've testified several times?

A. That is correct.

Q. Just for my benefit, I have a real big problem about talking with so many of your clients at-the-same-time. Could we try to avoid that during the depositions and if one of us does it, will the other one correct us?

1 side up --
 2 A I said there's two of them. The one on the left side is
 3 squared and the one on the right, the lower two plug covers are
 4 set skewed whereas the upper two, which are further up, are
 5 squared.
 6 Q But the other coil on the left side of the vehicle was
 7 damaged?
 8 A Yes, sir.
 9 Q But the one on the right side is your opinion was not as
 10 damaged as noticeably?
 11 A Yes.
 12 Q Anything else we haven't discussed that you based your
 13 opinion on that there were no defects in this vehicle?
 14 A I believe that's it.
 15 Q Okay. Let's go to opinion No. 3, that the fire did not
 16 start in the vehicle. What did you base your opinion on that
 17 the fire did not start in the vehicle?
 18 A I think we've talked about some of that, the degree of
 19 damage in the vehicle as a total compared to the degree of
 20 damage in the garage and house.
 21 Q Okay. Anything else?
 22 A I think that's pretty much it.
 23 Q Did you observe any burn patterns?
 24 A In the car?
 25 Q Uh-huh.

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1 Q Well, I described some of those in terms of bolts, the
 2 potential bolts.
 3 Q Other than the bolts you described, are there any other
 4 burn patterns that you feel are indicative of your opinion that
 5 the fire originated outside of the vehicle?
 6 A Well, I'm not offering anything as far as the house is
 7 concerned. I'm going to leave that up to Mr. Howell.
 8 Q Your opinion is the fire started outside the vehicle?
 9 A Yes.
 10 Q And I'm asking you is there anything else that you see on
 11 the vehicle that was indicative of the fire starting outside of
 12 the vehicle or that you base your opinion on?
 13 A I think I've described some of those.
 14 Q Now you described all of those?
 15 A Yes, I think so.
 16 Q So it would be fair, other than what we've discussed,
 17 there's nothing else that you base your opinion on that the
 18 fire started outside of the vehicle?
 19 A I will have to go through my photographs to see if there's
 20 anything else.
 21 Q Other than the photographs and what we're going to discuss
 22 in the photographs, would that be fair to say?
 23 A Yes.
 24 Q Did you view the photographs taken by Jim Shapley?
 25 A I reviewed them, yes.

1 Q Did you use them to base your opinion that the fire did
 2 not start in the vehicle?
 3 A No, not specifically. I mean I reviewed them as part of my
 4 thinking process, but as far as using them specifically, no.
 5 Q You told earlier that you based your opinion on the amount
 6 of damage to the car as it related to the extent of damage to
 7 the house. Is that correct?
 8 A That's that again.
 9 Q You said earlier, if I'm correct, that you base your
 10 opinion in part on the extent of damage done to the car as it
 11 relates to the extent of damage done to the house and the
 12 garage?
 13 A Yes, I indicated there was a lot of damage to the house
 14 and garage.
 15 Q Did you ever go to the house and garage to see the damage?
 16 A No, I did not.
 17 Q You did not look at the damage to the house and the
 18 garage?
 19 A From his photographs.
 20 Q Go back to my question I gave earlier --
 21 A Yes.
 22 Q -- would it be fair to say you base your opinions in part
 23 on the photographs you viewed taken by Jim Shapley?
 24 A In that respect, yes.
 25 Q Just as I understand you correctly, you never can ever

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1 and went to this house and saw the house damage, is that
 2 correct?
 3 A That's correct.
 4 Q You have been to this home since is that correct?
 5 A I went by it, yes.
 6 Q Took some pictures off it and stuff like that?
 7 A Right. It's not the age-home, of course.
 8 Q Wouldn't it be fair to say that a cause and origin
 9 investigator who went to the scene of the fire shortly after it
 10 occurred, that investigated the house, that investigated the
 11 rubble, that investigated the car as it sat in the lawn would
 12 be in a better position than someone who merely just looked at
 13 the pictures to render an opinion concerning the cause and
 14 origin of the fire?
 15 A That's a loaded question. He didn't have a better
 16 opportunity to make a better opinion. Whether he actually does
 17 a better job may be questionable.
 18 Q By question you wouldn't it be fair to say that he would
 19 be in a better position to render an opinion?
 20 A He needs use those firsthand possibly if he can not
 21 disturbed it before he saw it.
 22 Q So basically, he might see stuff that there weren't
 23 pictures taken of; is that correct?
 24 A If he sees something that's important, he should take a
 25 picture of.

Q Let me repeat one more time there weren't pictures taken off is that correct?
 A I will say it again. If he sees it's important, he should take a picture.
 Q I understand that.
 A If he doesn't take a picture of it, then he's got a problem.
 Q Is it important to have this, wouldn't it be fair to say that a cause and origin investigator who goes to the scene that investigates the automobile or it's off at the scene, investigates the house would be in a better position to render an opinion than someone who has not been to the scene and merely looks at photographs?
 A It would certainly be the best of all worlds.
 Q Exactly. Is that answer you, he would be in a better position?
 A I think he would be more capable of rendering a better judgment, yes.
 Q That's all I was asking for.
 You've had training in cause and origin investigation, haven't you?
 A Yes.
 Q And you would agree with me that it's important to see the scene?
 A I think it's very important.

Q If I told you that he's been primarily doing nothing but cause and origin investigation for 20 years, 25, 28 years, would you agree with me that he's more qualified than you are in cause and origin investigation?
 A Well, I've been working on it for about 12 years. So I guess I can't answer that question based on time.
 Q But you don't know that --
 A I don't know what the qualifications are. I just don't know.
 Q Is there anything else other than the photos you know about the inspection of the vehicle that you have your opinion on that the fire originated somewhere other than the subject vehicle?
 A Well, as I indicated earlier, the knowledge of how the vehicles, the components of the vehicles are made out of, the design of the vehicles. We talked about that earlier.
 Q And that was from your inspection of the vehicle?
 A Well, from my knowledge of the vehicle on a photo.
 Q Is there anything specific about your knowledge of the vehicle that we have not discussed that you feel is important or that you based your opinion on in this case?
 A No.
 Q What I'm getting at here -- and I'll stick you said no, but what I'm getting at -- and I've taken depositions of experts before and they had statements in their affidavits that they were

1 Q One of the most important things about investigating a
 2 fire is reviewing the scene of where the fire occurred.
 3 A Yes.
 4 Q Would that be correct?
 5 A Yes.
 6 Q Why is that?
 7 A As you indicated earlier, that he has a firsthand
 8 experience of looking at things as they were supposedly at the
 9 time of the fire, so he has a better opportunity to see things
 10 before they're disturbed.
 11 Q And would it be fair to say a lot of times seeing
 12 something is better than just having a photograph of it?
 13 A Yes, it could be.
 14 Q And I understand that you're here today, you're not going
 15 to render any opinions about the cause and origin of the fire
 16 is that correct?
 17 A Yes.
 18 Q Would it be fair to say Ralph Bechtel would be more
 19 qualified to render an opinion about the cause and origin of
 20 the fire than you would be?
 21 A I think he's doing more of it than I have.
 22 Q Would you agree that he's more qualified than you are?
 23 A I think so.
 24 Q Do you know about the qualifications of Jim Bechtel?
 25 A No, I do not.

1 Q Thinking "Well, this is what I think caused it" or "this is
 2 what I think happened, but since he didn't ask the specific
 3 question, I'm not going to tell him."
 4 Is there anything that you're thinking right now that may
 5 have contributed to this fire?
 6 A As far as the vehicle is concerned?
 7 Q As far as the vehicle is concerned that we have not
 8 discussed.
 9 A No.
 10 Q Other than the vehicle, is there anything that you think
 11 caused this fire?
 12 A I think there's some evidence in my mind that there may
 13 have been something in the carpet that may have caused this
 14 fire.
 15 Q What gives you that question in your mind?
 16 A Well, as I indicated earlier, the degree of damage is the
 17 damage as compared to the degree of damage to the vehicle.
 18 Q Anything else?
 19 A I do see a burn pattern on the west wall of the house.
 20 Q That P-shaped pattern?
 21 A Yes.
 22 Q And what does that tell you?
 23 A It tells me something was burning in that location fairly
 24 low --
 25 Q Anything else?

WALTER RALPH NEWELL, JR.

vs. PLAINTIFF
DEBORA WYCOFF, ET AL. DEFENDANT

COURT REPORTER OF MARION COUNTY, OREGON

INTERVIEWED
BY ATTORNEY OR CLERK
WALTER RALPH NEWELL
MARSHALL, OREGON

INTERVIEWED
BY ATTORNEY OR CLERK
ROBERT J. SCHAFFNER
MURRAY, KINNEY & SCHAFFNER
PORTLAND, OREGON
AND THEIR ATTORNEYS
LAWRENCE HORN, MARSHALL, OREGON

INTERVIEWED
BY ATTORNEY OR CLERK
ROBERT J. SCHAFFNER
MURRAY, KINNEY & SCHAFFNER
PORTLAND, OREGON
AND THEIR ATTORNEYS
LAWRENCE HORN, MARSHALL, OREGON

WALTER RALPH NEWELL, JR.

Page 4

RECORDED, INDEXED, AND TRANSCRIBED, ON THE 10th DAY OF
FEBRUARY, 1999, IN THE CITY OF PORTLAND, OREGON, AT 1:14 P.M., BY THE
ABOVE-NAMED WITNESS, MARSHALL, OREGON, IN accordance WITH
DEPOSITION FEE PAYABLE PURSUANT TO THE TERMS AND PROVISIONS OF
THE FEDERAL RULES OF CIVIL PROCEDURE, AT THE EXPENSE OF APPLICANT
FOR THE DEPOSITION.

* * * *

WALTER RALPH NEWELL, JR.

vs. PLAINTIFF
DEBORA WYCOFF, ET AL.

MR. ROBERT J. SCHAFFNER
MURRAY, KINNEY & SCHAFFNER
PORTLAND, OREGON
AND THEIR ATTORNEYS
LAWRENCE HORN, MARSHALL, OREGON

vs. DEFENDANT
ROBERT J. SCHAFFNER

MR. ROBERT J. SCHAFFNER
MURRAY, KINNEY & SCHAFFNER
PORTLAND, OREGON
AND THEIR ATTORNEYS
LAWRENCE HORN, MARSHALL, OREGON

Page 3

1 WALTER RALPH NEWELL, JR.,
2 having first been duly sworn to tell the truth, the whole truth,
3 and nothing but the truth testified on his oath as follows:
4 EXAMINATION
5 BY MR. ADVOKE:
6 Q Mr. Newell, would you please state your name for the
7 record.
8 A Walter Ralph Newell.
9 Q And I know you have given several depositions, but I just
10 want to make a statement to begin with. If I ever ask you any
11 questions during this deposition that you don't understand or
12 you don't know who or you want to explain more, will you agree
13 to stop me and correct me so I can make sure that your full
14 answer is what I'm getting here today?
15 A I certainly will.
16 Q You indicated that I am depending on your testimony in
17 preparation of my case and I need everything that you know about
18 a question. So if you have more explanation, I want you to give
19 it to me.
20 A I will answer the questions to the best of my ability.
21 Q Where do you currently reside?
22 A 2766 Quilliams - that's Q-U-I-L-L-A-N-S - Drive,
23 Gainesville, Georgia.
24 Q And how long have you lived there?
KELSO COURT REPORTING FIRM (501) 661-1515

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* additional photographic submitted to witness and laser copies attached.		

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1 A In this particular house - this is '99, isn't it?
2 About - almost 8 years.
3 Q And what do you do for a living?
4 A I'm a fire investigator.
5 Q How long have you been doing that?
6 A All total?
7 Q All total.
8 A Counting law enforcement, this will be pushing the 30th
9 year.
10 Q And I see that you have your own investigative service,
11 Newell Investigative Services, Inc.?
12 A Yes.
13 Q Is that where you are currently employed?
14 A Yes, sir.
15 Q At Newell Investigative Services, Inc., how many employees
16 do you have?
17 A I have one full-time investigator, two part-time
18 investigators, and an office manager.
19 Q And what is the address of Newell Investigative Services,
20 Inc.?
21 A I hate to tell this, but I'm going to have to lock it up.
22 Q Is it on your card here?
23 A No. My secretary moved my office last week while I was out
24 of town, but I keep finding her every time she moves, so - it
25 new address is 310 West Avenue, Suite 200, Gainesville, Georgia.

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Page 70

1 I grew in a cotton mill town, a textile mill. And cotton is
 2 famous for it. But finished cotton in the cloth was famous for
 3 it, too. And in those days when I was growing up they allowed
 4 them to smoke in the mill. And every once in a while they'd get
 5 a cigarette fire — smoldering, and it would go for hours and
 6 hours. And everybody would smell it, but they couldn't find it.
 7 And when they did find it, they would have a fire. Those kind
 8 of things can happen even today with cigarettes.

9 Q But the fire and the smoke and — did that happen within an
 10 8-hour period within a shift?

11 A Yeah — well, sometimes it would be the next shift. They'd
 12 be smelling it, but the next shift would come on and still be
 13 looking for it. At that's just an example. I didn't say that's
 14 what happened here. It's just an example of a cigarette and
 15 what it can do.

16 Q Let's get to what happened here. Have you been asked to
 17 render any opinions in this case?

18 A I have been asked to render my opinion, yes.

19 Q Have you developed an opinion?

20 A Yes, I have.

21 Q Could you tell me what that opinion is?

22 A My opinion is the fire did not originate in the Lincoln —
 23 in the 1964 Lincoln Towncar owned by the Wycoffs. My opinion is
 24 that it originated outside of the car. Where it originated and
 25 why it originated, I do not know.

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Page 71

1 Q So if I understand correctly, other than it not originating
 2 in the car, you have no opinion on where it did originate?

3 A I can't.

4 Q And as we sit here today, you're not saying that it
 5 originated in an electrical panel?

6 A I don't know that.

7 Q You're not saying it originated with a cigarette thrown on
 8 a bag of clothes?

9 A I don't know that.

10 Q The only —

11 A I can't eliminate, but I don't know it.

12 Q The only thing that you can eliminate from your opinion, if
 13 I understand correctly, is that it didn't start in the car?

14 A It did not start in the car and it definitely did not start
 15 at the right front fender well area where the power distribution
 16 box is located.

17 Q I know in different areas cases there can be opinions that
 18 you're just solid on, that there's no question. And there can
 19 be opinions that you just say, More likely than not, this is my
 20 opinion. In this case, which one of -- which kind of opinion is
 21 this?

22 MR. SALLINGS: You add some cases.

23 MR. SEXTON: Five.

24 THE WITNESS: Well, we'll take it.

25 MR. SEXTON: Five cases.

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Page 72

1 THE WITNESS: Five cases.

2 Q (By Mr. Sallings) And when I say some cases, I'm referring
 3 to five cases —

4 A Yes.

5 Q — as I've said it before.

6 A In this particular case, I am firm the fire did not start
 7 in this car. But based on the evaluation of the whole case,
 8 based on the examination that's already been conducted by others
 9 and my review of that information, I am firm that I cannot tell
 10 you what happened because I was not given the opportunity to
 11 examine the structure. And there is insufficient photographs
 12 and documentation for me to give you an opinion on it.

13 Q Well, you said two things there. And just so I can
 14 understand them correctly, the first one is that you were firm
 15 that the fire did not start in the car?

16 A Right.

17 Q But then you said, secondly, you were firm that you
 18 couldn't determine where the fire started because you
 19 weren't —

20 A Outside the car.

21 Q Outside the car.

22 A I'm sorry. That's like you saying arson. I meant outside
 23 the car.

24 Q I understand that. That's why that confused me. When you
 25 say "firm," are you saying that you're 100 percent sure that the

1 Q Much less the power distribution box?

2 A Much less the fire — in fact, I've seen less on that. And
 3 I don't know how it could be any less, but I did.

4 Q Just so I understand correctly, your opinions are that the
 5 fire did not originate in the car?

6 A That's correct.

7 Q But you don't know where it started other than the car?

8 A I know it started outside the car is all I know.

9 Q Any other opinions other than that?

10 A I — I don't know of any that I am to express. I won't say
 11 that I won't try to answer a question that may be asked of me if
 12 I feel like I'm qualified, but I don't know of any other
 13 opinions at this time.

14 Q Was there any indication from the stuff you reviewed that
 15 this was an arson fire?

16 A I don't know.

17 Q Well —

18 A I didn't see any indicators on it, no. Not with all the
 19 (quots) (end quots) red flags we have always been trained to
 20 recognize. I didn't see any of those.

21 Q What is your understanding of any other possible causes of
 22 this fire other than the car?

23 A Well, there's always electrical in the structure. There's
 24 — we go back to that dropped cigarette. We also don't know all
 25 the items and accelerators of the items that were stored on the

1 A I can believe that.
 2 Q Do you have any explanation for that?
 3 A Well, that could have been the AC unit or that could have
 4 been anything under pressure that's causing an air flow from --
 5 or an air push and fire being around it. That can do that,
 6 too. Usually, though, fires end very quickly after their
 7 explosion.
 8 Q You never talked to Mr. Harrison, did you?
 9 A No. I only read his deo.
 10 Q You never talked to Ms. Wootten, did you?
 11 A No, sir.
 12 Q Did you ever talk to the Wycoffs?
 13 A No, sir.
 14 Q How about the people living in the Cunningham residence?
 15 A No.
 16 Q Have you ever talked to any of the witnesses in this case?
 17 A No, sir.
 18 Q Have you ever talked to Mr. Swain?
 19 A Not about this.
 20 Q Or Mr. Hicks?
 21 A I didn't know Mr. Hicks. I haven't talked to him.
 22 Q Have you ever been to the fire scene?
 23 A No. I was informed that it had already been repaired so I
 24 didn't bother to go.
 25 Q Wouldn't you have to admit for me that an expert -- cause

1 and origin expert who had talked to Mr. Harrison, who had
 2 talked to the Wycoffs, who had talked to Ms. Wootten, who had
 3 gone to the scene and investigated the car while it was still at
 4 the scene would be in a better position to determine the cause
 5 and origin of this fire than you who just looked at the car and
 6 a few laser prints?
 7 A Absolutely. I agree with that 100 percent. I don't agree
 8 he did it, but I agree he had the opportunity.
 9 Q But you would agree that he would be in a better position
 10 to do it?
 11 A Absolutely.
 12 Q Mr. Sallinen, you mean Wells or Swain?
 13 THE WITNESS: Swain. Well, Wells, too. He was the
 14 first one there.
 15 Q (By Mr. Sexton) Do you know Mr. Swain?
 16 A You know I do.
 17 Q Do you have an opinion of Mr. Swain's credentials?
 18 A Yes. A very good man.
 19 Q Do you have an opinion of his credentials as a cause and
 20 origin investigator?
 21 A Well qualified. Jim Swain is as honest a man as I ever
 22 met. It doesn't mean he's right, but he's honest in his efforts
 23 and everything he does as far as I'm concerned.
 24 Q A nice man. Does he do a good job as an auto
 25 investigator?

1 A Fire investigator.
 2 Q Fire investigator?
 3 A A lot of difference there, by the way.
 4 Q Does he do a good job, in your opinion?
 5 A In my opinion, he does. He always has.
 6 Q In any of the cases that you've ever worked with him or
 7 anything that you've ever heard about him, have you ever heard
 8 anything negative about him?
 9 A No, I have not.
 10 Q Have you ever heard that he does a shoddy inspection?
 11 A No.
 12 Q Have you ever heard that he gives poor opinions?
 13 A No.
 14 Q Have you ever heard anybody say, Don't believe what
 15 Jim Swain says?
 16 A No. I'd probably stand up for him if I heard that one.
 17 Q But in this case, you two just have a difference of
 18 opinion?
 19 A Professional opinions. Yeah. Doesn't mean we're enemies.
 20 We just don't agree.
 21 Q I understand that. And, again, you'd have to admit for me,
 22 he was in a better position than you were to render an opinion?
 23 A He was in that position, that's correct. He sure was.
 24 Q He had more information than you did, didn't he?
 25 A If he did, he didn't share it with us.

1 Q He was at the scene. If you're at the scene and you can
 2 look -- and look at the scene, that gives you more information
 3 than looking at a photograph of the scene. Wouldn't you agree
 4 to that?
 5 A Yeah. I agree.
 6 Q And so you'd have to agree that he had more information
 7 than you did?
 8 A It was available to him, yes. I'm not going to say he had
 9 it. I'm going to say it was available to him. Whether he took
 10 advantage of it or not, is another story.
 11 Q And there is no way for you to know that, is there?
 12 A Yes, there is.
 13 Q How is that?
 14 A By looking at his photographs. No. 1 is he did not
 15 document single photographs, and he knows better. No. 2 is he's
 16 explaining photographs in his deposition that I can't even see
 17 in the photographs. The debris was recovered before he
 18 photographed it. There is no sketch of the fire scene showing
 19 any of this stuff. And if you want to get nit-picky I can, but
 20 Jim Swain is a good, honest man. He just missed this one.
 21 Q In your opinion?
 22 A In my opinion, and I'm sticking to it.
 23 Q I understand that.
 24 A Unless someone can show me some evidence different. And he
 25 told the truth about me taking his money in the poker game, too.

1 MR. ALEXANDER: Was that in Mr. Swain's deposition? I
 2 wasn't in this case at that point so I don't remember that.
 3 Q (By Mr. Sexton) Have you ever worked a case before with
 4 Mr. Crabbous?
 5 A Oh, yeah.
 6 Q When I was looking at this car, it looked like it was
 7 burned up pretty good. Do you feel that it's burned up pretty
 8 good?
 9 A No. I seen a lot worse cars than this.
 10 Q Okay.
 11 A This car afforded more to the investigator than the
 12 majority of them that I get in see.
 13 Q Do you feel that it was a severe burn?
 14 A It was a total loss if that's what you're asking me. I
 15 wouldn't want it.
 16 Q Mr. Crabbous gave some opinions about where he thought the
 17 fire originated.
 18 A Yeah.
 19 Q And one of things he based his opinion on in Page 45 of his
 20 deposition, that from his inspection of the vehicle he didn't
 21 think the car was damaged enough.
 22 A To be the origin of the fire?
 23 Q To be the origin of the fire.
 24 A I have to agree with that considering the extent of damage
 25 to the garage, carport, and the house. I don't know what his

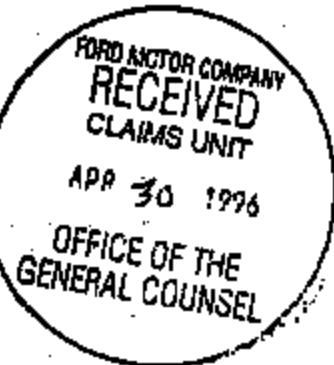
1 evaluation is overall on -- where you cut that off, but I had my
 2 own opinion of that, too. I would have -- I expected to see a
 3 much worse burned car than I saw.
 4 Q Have you ever worked a car fire where the car was parked in
 5 a carport that was open on two sides?
 6 A Oh, yeah. Yeah.
 7 Q Wouldn't you have to agree that the burn patterns and the
 8 possibility of flash-over would be different in a fire in that
 9 situation where there were two open sides than there would be in
 10 a garage where it was closed in?
 11 A "Different" isn't exactly the word for it. You don't even
 12 have a chance to flash-over in those buildings. Flash-over
 13 requires a heat buildup. And if you have -- you may have
 14 rollover of flame, but -- of course, it would be different. But
 15 you're still talking about combustible materials on three sides
 16 of the car -- or two -- three sides of the car -- the top and
 17 two sides. So we're still talking about a horrendous fuel load
 18 compared to sitting out in the open same place.
 19 Q One of the things Mr. Swain mentions in his deposition is
 20 that the hood on this car was completely burned up?
 21 A Yeah. I saw that.
 22 Q What do you think about what he said about the hood?
 23 A I'm not surprised. It's aluminum. I see that all time.
 24 What I do know, though, about hoods, is very simple. Even an
 25 aluminum hood affords a frying pan lid effect for an unknown



ALLSTATE INSURANCE CO.
P.O.BOX 21169
ROANOKE VA 24019
(800) 775-2615

REDACTED

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: 608 N 9TH 1/2

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

CAC:H

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

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

SIGNED: _____ DATE: _____

E982-020 57348 M

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

LAW OFFICES

FIRST COMMERCIAL BUILDING
400 WEST CAPITOL, SUITE 1900
LITTLE ROCK, ARKANSAS 72201

601 374-4535

FAX 601 374-4536

NOV 1997

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]

Dear Sir or Madame:

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 2983022239 MMH.

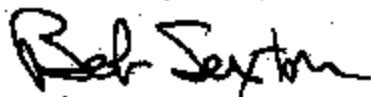
This cause of action involved a 1994 Lincoln Mercury Towncar Signature four door sedan which burst into flames, totally destroying the automobile and burning the house owned by Mr. and Mrs. Wycoff as well as a house owned by Darrell E. Cunningham. Damages in this case exceed federal jurisdictional limits.

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

BS/cwh

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

FILED

U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

NOV 04 1997

By: J. W. Miller CLERK
DEP CLERK
PLAINTIFFS

VS.

NO. J-C-97-421

FORD MOTOR COMPANY

Wright
Jones

DEFENDANT

COMPLAINT

Come the Plaintiffs, by and through their attorneys, Huckabee, 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. Plaintiff's 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 Plaintiffs Lester and Mildred Wycoff. 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 Wycoff 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] located at [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]
[REDACTED], Paragould Arkansas; damage to personal property owned by [REDACTED]
[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] 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] 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] pursuant to a policy of insurance covering a home located at [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] 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.
11 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

FIRE REPORT FORM 101

STATE- AR FIRE MFT- PARAGOULD

A. INCIDENT EXP. ALARM ARRIVAL TIME 1st
 FDID NUMBER NO DATE DAY TIME TIME SERVICE
 28300 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 * 0 - N/A

C. FIXED PROPERTY USE IGNITION FACTOR
 DWELLINGS/1-2 FAMILY * 411 IGNITION-FACT UNKNOWN * 00

D. CORRECT ADDRESS ZIP CODE CENSUS TRACT

E. OCCUPANT NAME TELEPHONE ROOM OR APT.

F. OWNER NAME ADDRESS TELEPHONE

G. METHOD OF ALARM FROM PUBLIC CO. 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 INVOLVED IN IGNITION
 GARAGE/CARPORT/STORAGE * 47 EQUIP-INVOLVED UNKNOWN * 00

L. FORM OF HEAT IGNITION TYPE MATERIAL IGNITED FORM MATERIAL IGNITED
 FORM-HEAT-IGN UNKNOWN * 00 SAWN WOOD * 63 STRUCTURAL MEMBER * 01

M. METHOD OF EXTINGUISHMENT LEVEL OF FIRE ORIGIN ESTIMATED LOSS
 HAND-LAID HOSE HYDRANT * 7 GRADE LEVL-9 FT ABOVE * 1 \$40,000

N.	NUMBER OF STORIES 1 STORY	CONSTRUCTION TYPE PROTECTED WOOD FRAME			
O.	EXTENT OF FLAME DAMAGE EXTND BEYOND BLDG	EXTENT OF SMOKE DAMAGE CONFINED BLDG ORIGIN			
	* 7	* 4			
	DETECTOR PERFORMANCE UNKNOWN	SPRINKLER PERFORMANCE NO EQUIP PRESENT			
	* 6	* 8			
P.	TYPE MATERIAL GENERATING MOST SMOKE ASPHALT TREATED MAT	AVENUE SMOKE TRAVEL OPENING IN CONSTRUCTION			
	* 86	* 5			
R.	FORM OF MATERIAL GENERATING MOST SMOKE ROOF COVERING				
	* 11				
S.	YEAR	MAKE	MODEL	SERIAL NO.	LICENSE NO.
T.					
COMMENTS: ENGINE 105 DADUS LADDER 101 MURRAY ENGINE 102 REDDICK OCCUPANT CLAIMS TO HAVE HERD EXPLOSION JUST BEFORE DISCOVERY OF FIRE. CAR UNDER CARPORT TOTAL LOSS.					60 61 62

OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT)

DATE

MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)

DATE

STATE- AR

FIRE DEPT- PARAMOUNT

A.	INCIDENT EXP. FILED NUMBER	DATE 10/07/95	DAY 7	ALARM TIME 09:01	ARRIVAL TIME 09:14	TIME IN SERVICE 12:20
TYPE OF SITUATION FOUND STRUCTURE FIRE			TYPE OF ACTION TAKEN EXTINGUISHMENT			MUTUAL AID N/A
C.	FIXED PROPERTY USE DWELLINGS/1-2 FAMILY	IGNITION FACTOR PROPERTY TOO CLOSE			* 65	
D.	CORRECT ADDRESS [REDACTED]	ZIP CODE [REDACTED]			CENSUS TRACT	
E.	OCCUPANT NAME [REDACTED]	TELEPHONE [REDACTED]			ROOM OR APT.	
F.	OWNER NAME [REDACTED]	ADDRESS			TELEPHONE	
G.	METHOD OF ALARM FROM PUBLIC TELEPHONE TIE-LINE	CO. # 7	INSP. DISTRICT 001	SHIFT C	NO. ALARMS 1	
H.	# FIRE SERV. PERG RESP 11	# ENGINES RESP 2	# AERIAL APP RESP 1	# OTHER VEH RESP 0		
I.	NUMBER OF INJURIES FIRE SERVICE 0	OTHER 0	NUMBER OF FATALITIES FIRE SERVICE 0			OTHER 0
J.	COMPLEX DWELLING COMPLEX	* 41	MOBILE PROPERTY TYPE NOT APPLICABLE			* 68
K.	AREA OF FIRE ORIGIN EXTERIOR WALL SURFACE	* 74	EQUIPMENT INVOLVED IN IGNITION EQUIP-INVOLVED UNKNOWN * 00			
L.	FORM OF HEAT IGNITION DIRECT FLAM/CONVECT CURR	* 81	TYPE MATERIAL IGNITED SAWN WOOD	FORM MATERIAL IGNITED *63 EXTERIOR TRIM	*1	
M.	METHOD OF EXTINGUISHMENT HAND-LAID HOSE HYDRANT	* 7	LEVEL OF FIRE ORIGIN 10 - 19 FT ABOVE	* 2	ESTIMATED LOSS \$18,000	

NUMBER OF STORIES
1 STORY

CONSTRUCTION TYPE

UNPROTECTED WOOD FRAME

D. EXTENT OF FLAME DAMAGE
CONFIND ROOM OF ORIGIN * 3

EXTENT OF SMOKE DAMAGE
CONFIND BLDG ORIGIN * 6

DETECTOR PERFORMANCE
UNKNOWN

* 9

SPRINKLER PERFORMANCE
NO EQUIP PRESENT * 8

E. TYPE MATERIAL GENERATING MOST SMOKE
SAWN WOOD * 63

AVENUE SMOKE TRAVEL
OPENING IN CONSTRUCTION * 5

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

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

COMMENTS: ENGINE 105- DACUS, LADDER 101- MURRAY, ENGINE 102- REDDICK
MEMBER MAKING REPORT CAPT. R L ROGERS 10-16-95

60

61

OFFICER IN CHARGE (NAME, POSITION, ASSIGNMENT)

DATE

MEMBER MAKING REPORT (IF DIFFERENT FROM ABOVE)

DATE

1973 46,750 VERSAM HERTZ

LIGHTS

- 353315

1969 502 119.465

1971 46 1097

1972 45 1097

1973 45 1097

1974 45 1097

1975 45 1097

1976 45 1097

1977 45 1097

1978 45 1097

1979 45 1097

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2017 45 1097

2018 45 1097

2019 45 1097

2020 45 1097

2021 45 1097

1969 502 119.465

1970 45 1097

1971 45 1097

1972 45 1097

1973 45 1097

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2010 45 1097

2011 45 1097

2012 45 1097

2013 45 1097

2014 45 1097

2015 45 1097

2016 45 1097

2017 45 1097

2018 45 1097

2019 45 1097

2020 45 1097

Register Name and Address

Vender Name/Address - 0315025351

Phone Authorization

Home

Business

Mobile

Fax

Driving City/Zip

Postal Code

Police Dept.

Police # Name

State Troop/Division

Port

277

Date

10/01/2003

Signed Date

2003

Charge Acct No

464

Port Number

USC

Repair Hourly Rate

10.00

authorized to repair Vehicle (Unit) Number

5297392

as per above specified and subject to the Terms & Conditions on the Previous Site. This authorization is not valid unless signed by an authorized Reparator.

Paul Harvey Ford

Paul Harvey Ford

10/01/2003

Date Out

10/08/2003

Date In

10/08/2003

Mileage Out

10687

Mileage In

10706

70000 10/01/2003

8892-525 57354

79567

8897392 68

VEHICLE IDENTIFICATION		YEAR	MAKE	MODEL	BODY STYLE																					
1LNLM82M0RY720247		94	LIN	N82	45																					
PURCHASE DATE	NAME DATE	ODOMETER 000015 <input checked="" type="checkbox"/> METER ACTUAL																								
05/14/94	04/21/94																									
OWNER(S) NAME AND ADDRESS [REDACTED]																										
INDIANAPOLIS, IN. [REDACTED]																										
MAILING ADDRESS [REDACTED]																										
INDIANAPOLIS, IN. [REDACTED]																										
FORD MOTOR CREDIT CO. 87956																										
<table border="1"> <tr><td>15314</td><td><input checked="" type="checkbox"/> Purchase date</td><td><input type="checkbox"/> First payment due date</td></tr> <tr><td>Signature of owner</td><td>1994</td><td>1995</td></tr> <tr><td colspan="3">FACR</td></tr> <tr><td colspan="3">THIS IS A FUNDING AGREEMENT</td></tr> <tr><td colspan="3">NOTE BUNCH</td></tr> <tr><td>Open date</td><td>1994-09-01</td><td>Term date</td></tr> <tr><td>SEP 20, 1994</td><td>\$</td><td>\$</td></tr> </table>						15314	<input checked="" type="checkbox"/> Purchase date	<input type="checkbox"/> First payment due date	Signature of owner	1994	1995	FACR			THIS IS A FUNDING AGREEMENT			NOTE BUNCH			Open date	1994-09-01	Term date	SEP 20, 1994	\$	\$
15314	<input checked="" type="checkbox"/> Purchase date	<input type="checkbox"/> First payment due date																								
Signature of owner	1994	1995																								
FACR																										
THIS IS A FUNDING AGREEMENT																										
NOTE BUNCH																										
Open date	1994-09-01	Term date																								
SEP 20, 1994	\$	\$																								
<p>The undersigned, being identified as the owner of the vehicle described on this form by signature, has been advised of the terms and conditions of this agreement and has read and understood the same. I further declare that the vehicle has been duly used and the owner of the described vehicle subject to the laws and regulations of the state of Indiana.</p> <p>CONTRACTOR GILBERT L. HOLMES U0891453</p> <p>GILBERT L. HOLMES 94532509030</p> <p><i>[Handwritten Signature]</i></p>																										

DISCLAIMER: Federal and State law requires that you state the mileage is consistent with the number of miles driven. Failure to complete or providing a false statement may result in criminal prosecution.

Please sign or print information. Dealer is responsible for transmitting form. If able to do so, type name, not signature and sign as written. Any person signing for a company must state position. You must pay for a new registration if the vehicle has been out of province, or pay a different amount of \$10.00. All fees shown on the back of this card will be paid by you except for a new title. Take this to your local DMV (Driver's License) to complete your application for a new title.

We swear or affirm that the information contained on this form is correct. We understand that a false statement may result in the loss of property.

I certify to the best of my knowledge that the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked.

Mileage (No Boxes)

- 1. The mileage stated is in excess of its actual miles.
- 2. The odometer reading is not the actual mileage. **WARNING - ODOMETER DISHONESTY.**

Name of owner

BOB MOTOR CREDIT CO.

Signature

Position

Jeff Stitzer

Date

TC

Dealer number

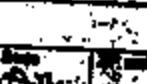
67956

Date of sale (month, day, year)

1-2-55

Name of purchaser

Patricia A. Foster



Date

1-2-55

Name of purchaser

Patricia A. Foster



Date

1-2-55

Name of purchaser

Patricia A. Foster



Date

1-2-55

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Name of owner

BOB MOTOR CREDIT CO.

Signature

Position

Jeff Stitzer

Date

TC

Dealer number

67956

Date of sale (month, day, year)

1-2-55

Name of purchaser

Patricia A. Foster

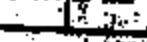


Date

1-2-55

Name of purchaser

Patricia A. Foster



Date

1-2-55

Name of purchaser

Patricia A. Foster



Date

1-2-55

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BOB MOTOR CREDIT CO.

Signature

Position

Jeff Stitzer

Date

TC

Dealer number

67956

Date of sale (month, day, year)

1-2-55

Name of purchaser

Patricia A. Foster



Date

1-2-55

Name of purchaser

Patricia A. Foster

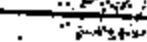


Date

1-2-55

Name of purchaser

Patricia A. Foster



Date

1-2-55

NO ADDITIONAL PRE-ARRANGEMENTS PERMITTED

Repairer City/Location <u>HFDY</u>	Area to be Charged <u>1502</u>	License Number [REDACTED]		Vehicle Unit Number <u>S297392</u>	Serial Number <u>11NMJMS2M02V720241</u>			
Name <u>Lr. 94</u>	Year <u>94</u>	Color <u>WT</u>	Body Style <u>4S</u>	Mileage <u>10187</u>	Vehicle to be Checked <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Reported On <u>7-8-94</u>	Check One <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Original Est. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Depreciation <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	Check One <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Credit One <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Storage <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Check One <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Date Due <u>7-18-94</u>

Check One For Type of Repair

Active Turnback Retail Wholesale Salvage Van Bus Trucking Yes No Storage Yes No

Check One

Credit One

Date Due

DENT - N - REPLACE			6 - STRAIGHTEN OR REPAIR			A - ALVIN								
EG.	FRONT	LHS.HRS.	PNT.HRS.	PARTS	EG.	L/F/R/FRONT	LHS.HRS.	PNT.HRS.	PARTS	EG.	R/FRONT	LHS.HRS.	PNT.HRS.	PARTS
N	Bumper/Cover					Fender, Front				N	Fender, Front	3.0	2.5	
	Absorber					Apron/Frt. Section					Apron/Frt. Section			
	Mounting Bar					Span Shield					Span Shield			
	Guard - Posts					Reinforcement					Reinforcement			
	Valence Panel					Rail					Rail			
	Filter Panel					Moulding - W/O				N	Moulding - W/O	1.2		
	Moulding	.5				Moulding - Side				N	Moulding - Side	1.2		
						H. Light Assembly					H. Light Assembly			
						Board/Door					Board/Door			
	UV1 Control Arms					Park Light					Park Light			
	Strut					Marker Light				N	Marker Light	.5		
	Spindle					Cowl					Cowl			
	Tire & Wheel					Odo, Front				N	Door, Front, Side	7.0	2.5	
S	Alignment	346.5				Hinge UVL					Hinge UVL			
N	Wheel	1.5				Hinge Pillar					Hinge Pillar			
N	Cover ODO & SENS	-	142.70			Lock/Latch					Lock/Latch			
	Grille					Glass					Glass			
	Headlight Panel	3.0	1.0			Moulding				N	Moulding SIDE	3		
	Front Headlight										Center Post			
	Front Bumper										Center Post			
	Front Skirt													
	Windshield					Rear Door				N	Rear Door	6.0	2.5	
	Mouldings					Hinge					Hinge			
	Door					Glass					Glass			
	Hinge R/H:					Lock/Latch					Lock/Latch			
	Mouldings					Lock Pillar					Lock Pillar			
	Lock / Support					Moulding					Moulding			
	Rocker Panel													
	Shroud													
	Support													
	Anti-Freeze													
	Fan Blade													
	A/C Condenser													
	A/C Receiver													
	Rear Bumper/Cover													
	Absorber													
	Guard - Posts													
	Unfinished Bar													
	Filter Panel													
	Moulding													
	Floor													
	Trunk Light													
	Open Tire Tools													
	Total	3.5	3.5	35.16		Mouldings					Total	21.4	12.8	116

Repairer Name and Address
Paul Harvey Corp

Vendor Area/Loc #

7-18

Appraiser Signature

I.D. # 8394

I certify to complete all repairs and replacements as specified in this authorization
within period of 8-15-94 and subject to the Terms & Conditions on the reverse
side. Quality of repair is guaranteed, as is delivery of vehicle on or before
No "open" items except as noted.

Customer Repriher (Solar) Brly

Date of Repaired Vehicle:

_____ on 8394

Mileage Out

10187

Date Out

7-8-94

Mileage In

10186

Date In

8-5-94

VENDOR COPY

Repair Authorization

Opening City Address

Name of Repairer I-B Solar

authorized to repair Vehicle Unit Number

S297392

as per above approved
and subject to the Terms & Conditions on the Reverse
Side. This authorization is not valid unless signed by an
authorized Hertz Manager.

I.D. # 8078

The Hertz Corporation

Paint Labor 13 \$294

Paint & Mat. 12.0

Sub Total (O/H) 12.0

Parts 493.7

Subtotal 519.7

Tax 5

Grand Total 1930.4

Change Amt. No 0.00

Parts Discount 35

Repair Hourly Rate

Body 10.00

Paint 15.00

Frame 35.00



(417) 662-1955

AUTO AUCTION

2644 W. Sunshine
Springfield, MO 65811-3074

YEAR

94 LINCOLN

TOWN CAR BIG ADEN

95-00E-24652

1/18/95 X -00E

81500 215072

AUTOMATIC TRANSMISSION

RENTAL REPURCHASES
TELE-AUCTION

SELLER (TRANSFEROR)

60035 232391
FORD MOTOR CREDIT COMPANY
PO BOX 43362
DETROIT MI 48243-3362
000-000-0000
IND

DOCUMENT NOT VALID FOR EXPORT - NO RETAIL SALES

ALL VEHICLES SOLD TO DEALERS FOR RESALE ONLY WITHOUT WARRANTY.

AUCTION AGENT HAS NO RESPONSIBILITY NOR GUARANTEES THE ACCURACY OF THE ODOMETER READING.
AUCTION ACCEPTS NO RESPONSIBILITY FOR THEFT, LIABILITY OR PROPERTY DAMAGE.

AUCTION COPY

FACTORY

ODOMETER DISCLOSURE STATEMENT

Federal Law (and State Law, if applicable) requires that you state the mileage information with the transfer of ownership. Failure to complete or providing a false statement may result in fines and / or imprisonment.

ENTRY NO.

X-35

FORD MOTOR CREDIT COMPANY

STATE THAT THE ODOMETER ON THE VEHICLE DESCRIBED BELOW NOW

18,815

MILESTOMETERS (On Tires)

ADDED TO 10%, BASED ON MY KNOWLEDGE THAT IT REFLECTS THE ACTUAL MILEAGE OF THE VEHICLE DESCRIBED BELOW, UNLESS ONE OF THE FOLLOWING STATEMENTS ARE CHECKED.

(1) I hereby certify that to the best of my knowledge, the odometer reading as of today reflects the amount of mileage in excess of its mechanical life of vehicle described below.

(2) I hereby certify that the odometer reading stated above is NOT the actual milage of the vehicle described below. WARNING - ODOMETER DISCLOSURE STATEMENT

MAKE	MODEL	BODY	YEAR
LINCOLN	TOWN CAR BIG ADEN	94	

VEHICLE IDENTIFICATION NO.	DEALER STOCK NO.
1LNLM9M9WY720847	232391

TRANSFEROR'S STREET ADDRESS (SELLER)	PO BOX 43362
--------------------------------------	--------------

CITY	STATE	ZIP CODE
DETROIT	MI	48243-3362

DATE OF STATEMENT	1/12/95 X
-------------------	-----------

TRANFEREE'S SIGNATURE (BUYER)	
-------------------------------	--

TRANSFEREE'S NAME AND ADDRESS (BUYER)	
---------------------------------------	--

PRINTED NAME OF PERSON SIGNING _____ DATE _____
TRANSFEREE (BUYER) MUST RETURN SIGNED COPY OF ODOMETER DISCLOSURE STATEMENT (FRONT & BACK OF TITLE IF MADE ON TITLE TO TRANSFEROR OR BE SUBJECT TO CIVIL AND CRIMINAL PENALTIES INCLUDING FINES AND JAIL.

Truth In Mileage Act of 1982 46 C.F.R. 500.5(j)

TYPE	AMOUNT	DISCOUNT	DATE DEPOSITED	BUYER'S CHECK NO.
SAFETY FEES	\$ 3.00			
REGISTRATION FEES	\$ 2.00			
TOOK	\$ 50.00			
TDH	\$			

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

3525 3526 3527
3528 3529 3530

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

F3=EXIT

1002 REQUESTED INFORMATION DISPLAYED

OGDB191

CSOR0024

MORS II OASIS Inquiry

12/01/97 10:06:04

VIN: 1G82W2SY691338

Year: 95 Model: TOWN CAR

Name:

Calib: 518JR13

Build Date: 02/14/1995

Recall Description

Axele: 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

X002 REQUESTED INFORMATION DISPLAYED

OGDB191

500-222-5737

CSC30087

MORS 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
T223 NO CUSTOMER DATABASE INFORMATION FOR THIS REQUEST

OGDB191

CSOR0021

MOMS 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	Description	Campaign Status	Status Date	Dealer Code
94589	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

CSvR0023

MORS II ESP Inquiry

02/11/1998 16:35:26

VIN: ILNE WORY720247 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/Rm	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

CSORUU24

MORS II OASIS Inquiry

02/11/98 16:35:32

VIN: 1LM 2W0RY720247

Year: 94 Model: TOWN CAR

Name:

Calib: 418JR00

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	Dad
--	--	--	--	--	--	--	--	--

COVERAGE DESCRIPTION: NO ESP DATA

F3=EXIT

1002 REQUESTED INFORMATION DISPLAYED

OGDB191

520-825-5314

MVMP510

MAVIS Vehicle Inquiry

02/11/98 16:34:16

==> VEHICLE # 1LRY720247 (MMYFBBBRRR) vins: 1LNLM82W0RY720247 Div: 3 Status: 800
 Vehicle Line: CVB Convoy Deliv: 031694 Orig P-Lvl: 410 Selling Dlr: 455741
 Order Recpt: 021794 ShipTo Stat: Curr P-Lvl: 410 Sale Date: 032994
 Orig Sched: 031494 Rls-To Stat: OK Order Dlr: 45741 Demo Date:
 Inv Prep: 030794 Orig Int St: 031594 Orig Rls Dlr: 45741 Deliv Type: H
 Prod Date: 031494 Curr Int St: 031594 Rls Dlr PAA: 09627 Sales Prd: 094033
 Rls Date: 031494 DlrFin Ext: Warx Start: 032994 Cancel St:
 Memo Consign: P&C Ext: 041094 WarxS-Ind: Sale Status: G
 Orig Pltbus: 031494 Advert Ext: -Date- -Dealer-
 Curr Pltbus: 031494 Slspnm SS#:
 T/Name: 9
 Addr: [REDACTED]
 City: OKLAHOMA CITY State: OK 1st-Prior:
 Zip: [REDACTED] M/A-Recpt: 032994 2nd-Prior:
 3rd-Prior:
 V.O.: 1 2 3 4 5 6 7 8
 12345234567890123456789012345678901234567890123456789012345678901234
 M82RY 3 5114C1180 EB F 3 P1 3P GL62 P K455741 QVAMJ
 8 9 0 1 2 3 4 5 6
 567890123456789012345678901234567890123456789012345678901234567890
 D6 8 W1LNLO 8 D 2D A755A WP HZ001
 F1=Help F3=Exit F4=Primary Menu F5=Financial Screen F9=Screen #3

OGDB191

E
M
S
U
C
S
C
S

NVP520

MAVIS Financial Screen

02/11/98 16:34:29

=> VEHICLE # 1LRY720247 (WVYPUBH000) Vin: 1LNLM82W0KT720247 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 Hb Adj:	.00	Chargeback Amt:	
Optn Holdback:	.00	Option Hb Adj:	.00	30-Day FP Amt:	.00
Misc Charges:	7.00	Gas Amt:	.00	Floor Plan:	90.43
Finance Chrgs:	.00	Sched-B Amt:	625.00	P&C Charge:	87.88
PTDWF/LMDA:	.00	Mktng Contrib:	.00	Pre-Dlvry Amt:	.00

Financing Data - - - - -

Finance Source:	0000001	O-Marr Start:	032994	Release Date:	031494
Orig Int St-Sw:	N	Co Tag Number:		Transit Time:	4
Ret Draft Ind:		Pre-del Date:		Rls Plus Trans:	031894
Floor Pln Date:	041094	Prdlvry S.Code:		Ramp Code:	
Advt Cmss Code:		Lease Code:		Method Shipped:	5
Upfront FP Ind:		Invoice In-Proc:	110194	Memo Cons Loc:	

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

OGDB191

02-02-01

EVNRP530

>=>

VEHICLE

1LRY720247 (INVTPRSBHS) Vin: 1LNLM82W0KA720247 Div: 3 status: 800

Ordering Name: [REDACTED]

Secondary Name:

Ordering FIN: HZ001

Order-For FIN:

Orig Ord'r 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

Knis Cntl Lbl: KBL

EMC:

Engine Tag Cd: EG812AA

Engine Serial:

Driver Airbag: FTAE2M18ATL

Axle: JY

Passngr Airbag: LH026B812

OGDB191

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

EVNRP530
SMB-028
SMB-029

COMMAND =>

***** VEHICLE INFORMATION SUMMARY *****

VIN YEAR MAKE MODEL STYLE CYL UN WG COLOR DIS
 1LNLM82W0RY720247 1994 LINC TOW 4D 8 4057 BLU

DISMANTLED: STOP PROCESS:

PURCHASE DT: PUR TYP: DEALER LIC:

STATE : NBR OF AXLES: FUEL CODE: G

***** SPECIAL VEHICLE INFORMATION *****

DATE: 04-25-1995 TIME: 1 IRP:

LICENSE NBR: 23999 LICENSE END DATE:

STATUS:

LIC END REASON:

PRINT TITLE STATUS: P WAS PRINTED ONLINE

== MODIFY ==..... S RA RXLHEAT 02-05-98 12:42:

1-HELP 3-QUIT 12-REG-INFO 13-TTL-INFO 14-FEE-INFO 15-DL-INFO 17-ERR-CODE

SAPIENS - TRANSACTIONS VEH INQUIRY INFO (560162)

COMMAND =>

***** REGISTRATION INFORMATION *****

LICENSE TYPE USE DECAL INV EXPIR DATE LEASED
 23999 DXLP DX 064708D 96PC 05-31-1996

RENEWAL OD READ: LICENSE ENDING DATE: IRP FLAG:

ACCOUNT NBR: WEIGHT: TOTAL: .00 FEE: 25

OWNER (S):

NAME [REDACTED] DR

COMPANY NAME:

NAME [REDACTED]

COMPANY NAME:

ADDRESS [REDACTED]

CITY NAME: PARABOUL STATE: AR ZIP CODE: [REDACTED] COUNTY:

ATTENTION:

RENEWAL MAILING ADDRESS:

CITY NAME: STATE: ZIP CODE: COUNTY:

ATTENTION:

TITLE MAILING ADDRESS:

CITY NAME: STATE: ZIP CODE: COUNTY:

ATTENTION:

== MODIFY ==..... S RA RXLHEAT 02-05-98 12:42:1

1-HELP 2-SELECT 3-QUIT 11-HISTORY 13-TTL-INFO 14-FEE-INFO

SAPIENS - TRANSACTIONS VEH INQUIRY INFO (560163)

COMMAND =>

***** TITLE INFORMATION *****

TITLE NBR: 9512311501 REEL/FRAME: 0513306065 USER ID: CONVER

TITLE BRAND: ISSUE DATE: 05-04-1995 OD-CODE: 3 OD-READ: 155

PREV TTL INFO: PREV TTL NBR: PREV STATE:

LIEN NBR: 1 NAME:

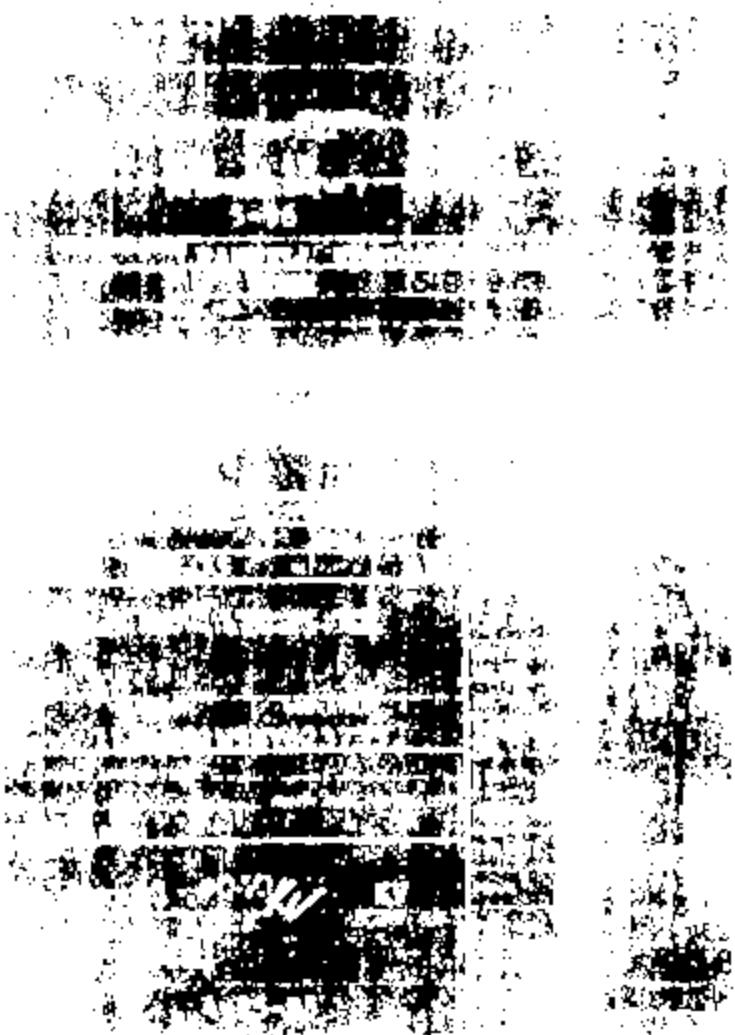
ADDRESS: STATE: CONTRACT DT: RELEASE DATE:

CITY: ZIP CODE:

LIEN NBR: 2 NAME:

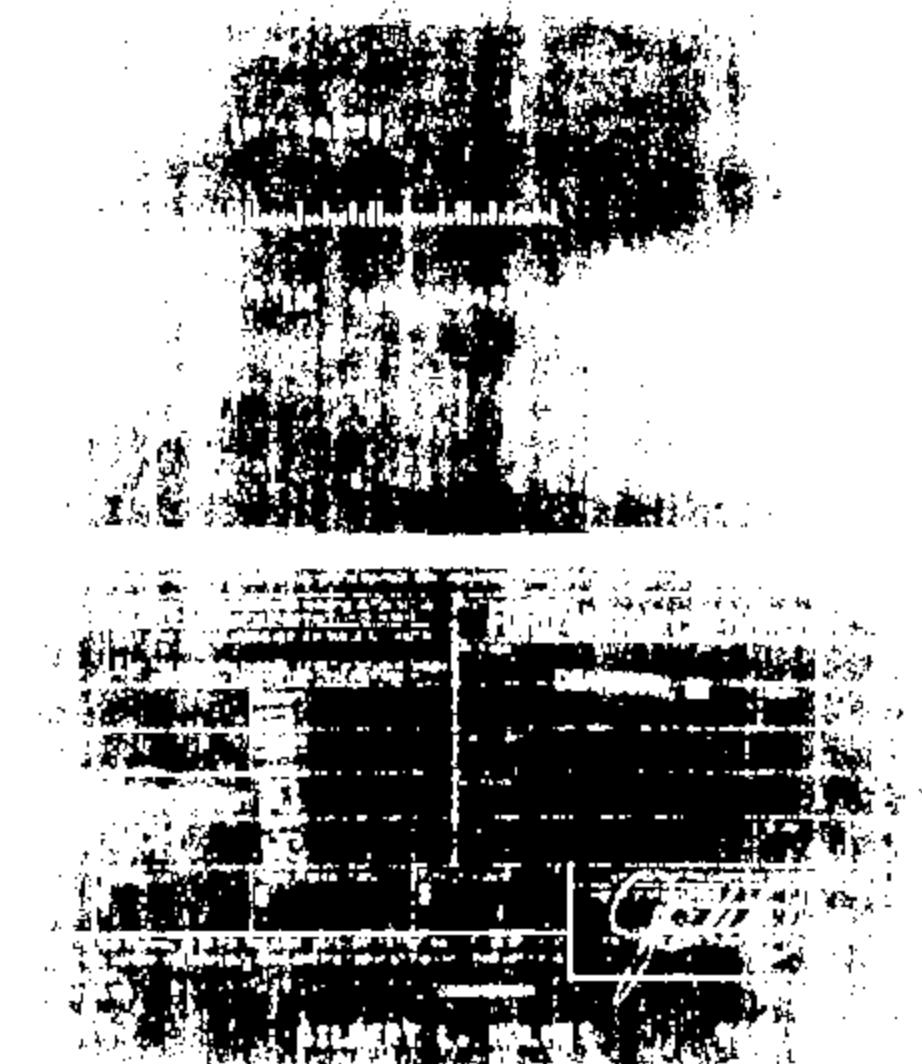
ADDRESS: STATE: CONTRACT DT: RELEASE DATE:

CITY: ZIP CODE:



882-825 57364

E982-825 57365



ER02-020 57248

MOTOR CREDIT CO.

Jeri Stitzer

B7356

Master B. Myer

610 N. 9th St.

Omaha, NE

Goodwillers, Inc.

[Redacted]

5.209

E982-825 B7357

ER02-026 57368

1998
Motor Number 3000000000720243
Owner Name
Office 47

City - Milwaukee
State Tag Number
Tow Tag
Issue Date 10/1/1998
Expiry Date 10/1/2000
2000 Tow Tag Stamp

* GENERATED BY:
* FRANCES KLEASIR
* PHONE: 313-337-5881
* JOB: OOD81911
* JODDATE: 02/12/98
* TIME: 6:13:12

PRODUCTION VERSION 3.7

* VEHICLE HISTORY (SH-II) TYPE

* MODEL YEAR = 94
* CUT-OFF DATE = 13 JAN 98
* REPORT TITLE = XXXXXXXXXX
* VEHICLE TYPE = CARS

* REPORT CLAIM TYPE = ALL CLAIMS

* REPORT SORT SEQUENCE = PLANT CODE \ SERIAL NO
* PAGE ON PRIMARY SORT? -
* PARETO MJS VALUE =
* PLANT/SERIAL NUMBERS = Y720247

12FEB98
PAGE 2.01

1994 GE-II PARTS BY CONDITION CODE SUMMARY (AP98 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FRANCIS KLEBASIR

PART NO	CD	COUNT
	08	1
13ND21	46	1
713208	58	1
9H308	56	1

12FEB98
PAGE 3.01

1994 SW-II PARTS BY CUSTOMER CONC. CODE SUMMARY (13JAN98 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
FRANCIS KLEINER

PART NO	CCC	COUNT
13N021	A99	1
713208	L21	1
9H308	B41	1
	M02	1

12FEB98
PAGE 4.01

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

NUMBER	PART DESCRIPTION	COUNT	CD-DESCRIPTION	COGENT	CUSTOMER CONCERN CODE DESCRIPTION (CCC)		COUNT
					CD-CODE	DESCRIPTION	
13N021	AERO HD/LAMP CAPSUL	1	08	1	A99	ADMINISTRATIVE (PARTS RETURN,MISBLT)	1
713208	SCUFF PLATE-DOOR	1	46-BURNED OUT	1	B41	APPEARANCE/FIT (BODY TRIM)	1
9H308	TUBE ASSY AIR VALVE	1	56-NOISE/RATTLE/SQ	3	L21	APPEARANCE/ATTACHMENT (LIGHTING SYS)	1
		1	58-ASP BROKEN	1	H02	NOISE-UNDER HOOD/FRONT OF VEHICLE	1

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

XXXXXX XXXXX XXXXX
 XX XX XX XX XX XX
 XX XX XX XX XX XX

* CLAIMS LISTING FOR 1994 MODEL WYCOFF
 * SORTED BY: PLATCODE SERIALNO MILEAGE

REQUESTED BY: FRANCES KLEABIE 13JAN98 C/O
 DATA SOURCE: PMS SE-II

SUMMARY						RATIOS																	
TOTALS						CLAIMS			CLAIMS			CLAIMS			MATERIAL			TOTAL			PCT CLMS		
CLAIMS	W/COMTS	IN TIS	VEHICLES	DEALERS		MATERIAL	TOTAL	COST	PER VEH.	PER DELR.	TOTL/SAMP	MATERIAL	TOTAL	COST	COST/REP	COST/REP	W/COMTS						
4	2	4	1	3		\$64.16	\$200.65	*	4.00	1.33	1.00	\$16.04	\$50.16	50t									

CLAIMS LISTING TITLE ABBREVIATIONS

SERIAL CAR B/S	ETRS	PLT	PROD	WARR	SELL DATE	CLAIM NUMBER	MICRO C NUMBER	WCC NUMBER	PART NUMBER	CC NUMBER	CCC NUMBER	CD NUMBER	REPR DATE	T IS CODE	TACT	MILES	MATL.	TOTL.	LBR	REPR	ST COST	HRS DEALR
123456	ESC	3G7	9MN	MAY 09NOV93	04FEB94	11111	123456	JHP34001	7804	17A553	46	C05	46	23SEP94	*	606	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 ODOMETER READING -->
 <-- TRANSACTION CODE-PRE PAYMENT EDIT -->

ENGINE CODES

A - 2.0EPI-DOHC-PROBE	V - 4.6EPI-DOHC
B - 2.5EPI-DOHC-PROBE	W - 4.6EPI-DOHC
D - 5.0EPI-SHP COBRA	X - 2.3EBC
H - 1.8EPI-ASPIRE	Y - 3.0EPI-SHO
J - 1.9EPI	Z - 1.6EPI-CAPRI
P - 3.2EPI-DOHC SHO	1 - 3.0MPI-FLEX FUEL
R - 3.8EPI-SUPERCHRGD	3 - 3.8EPI-FWD
T - 5.0EPI-HO LO-PRO	4 - 3.8EPI-RWD
U - 3.0EPI	6 - 1.6EPI-TURB-CAPRI
	8 - 1.8EPI-DOHC

TRANSMISSION CODES

A - AX4S (AXOD)
B - ATX (BATAVIA)
C - MTX (4 SPD CM4B)
D - MTX (5 SPEED)
E - ATX (4 SPD-4 RAT)
F - ATX (3 SPD ASPIRE)
G - AODB (ELECTRONIC)
H - MTX (3 SPEED)
I - ATX 4SP(AUTO-CAPRI)
J - AX4M (AXOD)
K - 4R70W (MARK VIII)
L - 5 SPEED(T-BIRD S.C.)

<-- 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)

2 = 5 SPEED(T5-MUSTANG)
 4 = 4R70W (MARK VIII)
 5 = 5 SPEED(T-BIRD S.C.)
 6 = MTX 4 (5 SPEED)
 7 = MTX (5 SPD ASP/CAP)

***** 1993 VEHICLE YEAR PASSENGER-CAR BODY DESCRIPTIONS *****								***** 1993 LIGHT TRUCK BODY DESCRIPTIONS *****							
VEHICLE	BODY	DESCRIPTION	VEHICLE	BODY	DESCRIPTION	VEHICLE	BODY	DESCRIPTION	VEHICLE	BODY	DESCRIPTION				
MUSTANG (MUS)	2LX	2 DOOR SEDNDRD LX		3LX	3 DOOR LX	F-SERIES	1SF	150 L.DUTY CONV.	35B	350 H.DUTY SUPR					
	2CG	2 DOOR COVNT GT		3GT	3 DOOR GT	4X2 (F92)	2SF	250 L.DUTY CONV.	35C	350 H.DUTY CREW					
	2CL	2 DOOR COVNT LX		3GC	3 DOOR GT-CORSA	4X4 (F84)	2HF	250 H.DUTY CONV.	45J	450 H.DUTY CONV					
PROBE (PRB)	3-B	3 DOOR BASE	CAPRI (CAP)	2-B	3 DOOR COVNT BASE		3SF	350 H.DUTY CONV.	B-L	BASE					
	3GT	3 DOOR GT		2XR	2 DOOR COVNT XR2		15B	150 L.DUTY SUPER	BLT	XLT					
ESCORT (ESC)	3-B	3 DOOR BASE	TRACKER (TRA)	4-B	4 DOOR BASE		25B	250 L.DUTY SUPER	BBB	EDDIE BAUER 4X4					
	3GT	3 DOOR GT		4LT	4 DOOR LTS		2HB	250 H.DUTY SUPER							
MLX	STATION WAGON	LX		W-B	4 DOOR BASE										
3LX	3 DOOR LX														
4LX	4 DOOR LX														
4LE	4 DOOR LX-E														
5LX	5 DOOR LX														
TEMPO (TEM)	2GL	2 DOOR GL	TOPAZ (TOP)	2GS	2 DOOR GS	VILLAGER (VIL)	GS	GS WAGON							
	4GL	4 DOOR GL		4GS	4 DOOR GS	VLS	LS	LS WAGON							
	4LX	4 DOOR LX				VAN	BASE VAN								
TAURUS (TAR)	4-P	4 DOOR POLIC	SABLE (SAB)	4GS	4 DOOR GS	AEROSTAR	<--	REGULAR BODY	<--	EXTENDED BODY					
	4PL	4 DOOR ALLOC POLIC		4LGS	4 DOOR LS	4X2 (AR2)	RWL	WINDOW WAGON BASE	4WL	WINDOW WAGON BASE					
	4SH	4 DOOR ALLOC SHO		4LL	4 DOOR ALLOC GS	4X4 (AR4)	RWM	WINDOW WAGON XL	SWL	WINDOW WAGON XL					
	4-G	4 DOOR GL		4LL	4 DOOR ALLOC LS	RWH	WINDOW WAGON XLT	SWK	WINDOW WAGON XLT						
	4LX	4 DOOR LX		WBS	STATION WAGON GS	RWE	EDDIE BAUER WAGON	SWH	EDDIE BAUER WAGON						
	4GL	4 DOOR ALLOC GL		WBL	STATION WAGON LS	RCL	CARGO VAN BASE	SCL	CARGO VAN BASE						
	4LL	4 DOOR ALLOC LX		WGL	ST WAGON ALLOC GS	RCH	CARGO VAN XL	SCN	CARGO VAN XL						
	W-G	STATION WAGON GL		WLL	ST WAGON ALLOC LS	RVL	WINDOW VAN BASE	SVL	WINDOW VAN BASE						
	MLX	STATION WAGON LX				RVM	WINDOW VAN XL	SVN	WINDOW VAN XL						
	MLL	ST WAGON ALLOC BASE													
	WGL	ST WAGON ALLOC GL													
	WLL	ST WAGON ALLOC LX													
T-BIRD (TBD)	2-B	2 DOOR BASE	COUGAR (CGR)	2XR	2 DOOR XR7	***** 1993 ECONOLINE/CLUB WAGON *****									
	2LX	2 DOOR LX		2XL	2 DOOR ALLOC XR7	VEHICLE BODY DESCRIPTION									
	2SC	2 DOOR ALLOC SC				(SCH)									
	2BL	2 DOOR ALLOC BASE				<-- ECONOLINE									
	2LL	2 DOOR ALLOC LX				1BB	150 HINGED	DOOR BASE	1BM	150 HINGED	DOOR	CUST			
						1BK	150 HINGED	DOOR XL	1BH	150 HINGED	DOOR	XLT			
						2BB	250 HINGED	DOOR BASE	1BP	150 HINGED	DOOR	CHAT			
						2BK	250 HINGED	DOOR XL	3BB	350 HINGED	DOOR	CUST			
						2BL	250 HINGED DR	SUPR BASE	3BH	350 HINGED	DOOR	XLT			
						2BK	250 HINGED DR	SUPR XL	3BP	150 HINGED	DOOR	CHAT			
						3BB	350 HINGED	DOOR BASE	3BL	350 HINGED DR	SUPR	XL			
						3BK	350 HINGED	DOOR XL	3BH	350 HINGED DR	SUPR	CUST			
						3BL	350 HINGED DR	SUPR BASE	3BH	350 HINGED DR	SUPR	XLT			
						3BK	350 HINGED DR	SUPR XL	3BP	350 HINGED DR	SUPR	CHAT			
						3BL	350 SLIDING	DOOR BASE	1BL	150 SLIDING	DOOR	CUST			
						3BK	350 SLIDING	DOOR BASE	1BH	150 SLIDING	DOOR	XLT			
						3BL	350 SLIDING	DOOR XL	1BP	150 SLIDING	DOOR	CHAT			
						2BB	250 SLIDING	DOOR BASE	3BB	350 SLIDING	DOOR	CUST			
						2BK	250 SLIDING	DOOR XL	3BP	250 SLIDING	DOOR	XLT			
						3BK	250 SLIDING	DOOR EL	3BP	350 SLIDING	DOOR	CHAT			
						3CL	350 CUTAWAY	BASE							
						3CM	350 CUTAWAY	XL							
						2BT	250 STRIPPED CHASSIS								
						3BT	350 STRIPPED CHASSIS								

12FEB98 CLAIMS LISTING FOR 1994 MODEL MYCOPP
PAGE 1 REQUESTED BY PLINTCODE SERIALNO MILES82

13JAN98 C/O REQUESTED BY:
DATA SOURCE: PAGE SH-II 153460

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

VEHICLE INFORMATION

SERIAL CAR B/S	ETS	PLT	PROD	MANF	SELL	CLAIM	MICRO C	MCC	PART	CC	CCC	CD	MEPR	T	TACT	MILES	MATL.	TOTAL	LBR	MEPR	%	
NUMBER	LINE	CCI	NAME	DATE	DATE	DEALER	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	NUMBER	DATE	IS	CODE	COST	COST	HRS	DEALR

720247	LMC	4-S	WPF	WIX	14MAR94	29MAR94	09627	026562	QVP01891	7D01	13M021	46	L21	46	12APR94	1	2	3113	16.04	24	0.2	04896	G
720247	LMC	4-S	WPF	WIX	14MAR94	29MAR94	09627	250037	ZKC60911			A99	09	27AUG94	6	9488	13192	0.00	58	1.5	45260	I	
720247	LMC	4-S	WPF	WIX	14MAR94	29MAR94	09627	278499	PT18C5H0	6M02	713208	B41	58	09MAY95	14	E84	16853	10.00	18	0.1	06009	A	

** COMMENTS-CLAIM #3 COOM-RT DOOR SILL TRIM WARPED

TECH-REPLACE RT BOTTOM DOOR SILL TRIM

** COMMENTS-CLAIM #4 COOM-ROAR NO IDLE

TECH-SS08 TEST AND REPLACE TUBE AND VALVE AND DID QUIETEST

+ THIS LISTING CONTAINED 4 TOTAL CLAIMS



Vehicle Accident Report

- Please send copy of Rental Agreement
 Please send copy of the Title or
 lease Agreement

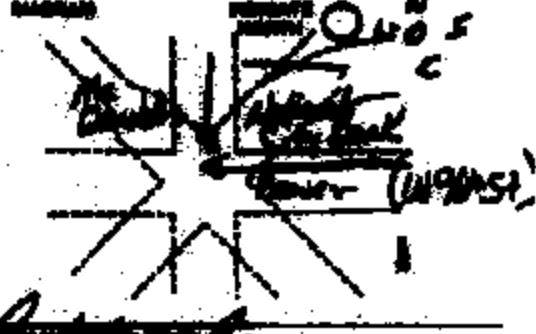
Primary Coverage
 Secondary Coverage

Policy No.	07-7392	Period
Exhibit No.	07-7392	Period
Policy Date	07-04-8457	Period
Policy Holder	Mr. & Mrs. John T. Smith	Period
Address	123 Main Street, Anytown, PA	Period
Phone No.	555-1234	Period
Car Model	BMW 325i	Period
Car Color	Black	Period
Car License No.	PA 123456	Period
Car VIN	WBAZK12345678901	Period
Car Year	1996	Period
Car Make	BMW	Period
Car Type	Sedan	Period
Car Model	325i	Period
Car Color	Black	Period
Car License No.	PA 123456	Period
Car VIN	WBAZK12345678901	Period
Car Year	1996	Period
Car Make	BMW	Period
Car Type	Sedan	Period
Car Model	325i	Period
Car Color	Black	Period
Car License No.	PA 123456	Period
Car VIN	WBAZK12345678901	Period
Car Year	1996	Period

Time	10:00 AM	Date	July 7, 1998
Location	Intersection of 9th St. & Main St., Anytown, PA	Witness	John Smith
Driver	John Smith	Passenger	Mrs. Smith
Vehicle	BMW 325i	Color	Black
Condition	Good	License No.	PA 123456
VIN	WBAZK12345678901	Year	1996
Model	325i	Type	Sedan
Make	BMW	Color	Black
Signature	RH	Date	July 7, 1998

Accident Information (Accident occurred on 9th St. west of 1st and Main, Anytown, PA)
 I was east bound in the right hand lane of 9th St. @ 5 mph.
 Mr. Smith was trying to make a turn onto 1st and he claimed to not see me and passed into my side, striking the passenger side of my car with full force at the front of his car.

<input type="checkbox"/> No Damage	<input type="checkbox"/> Light
<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Heavy Damage
Description of Damage	
<input type="checkbox"/> No Damage	



6/22/98
MELVIN HERTZ LAW

07-04-8457

Date 7/26/, 1994

INTERSTATE INSURANCE INSURANCE

Our File No: 9463463 - H-

Name of Tenant/Owner _____

Name address _____

Olive Branch, MS

Business Address _____

Olive Branch, MS

Business Phone _____

Home Phone _____

Name of Your Insurance Co.: Midlife Policy # 0-45-03722

Type of Insurance Carried: _____

Driver of

Your Car _____

Address _____

Phone _____

Relationship of

Driver's

License

Purpose of

Driver to Owner/Renter _____

Age _____

Number _____

Use of Auto _____

Date of Accident 7/29/9, 1994 Time 5:50pm

Where? (No and Street) _____ City-state _____

Which Police Department? In what, Eaton, IN their number 1

VICTIM'S DETAILS			Age	Relation to owner	year car	other car	Pedes- trian	Occupant of
Name	No.	Address						

Nature of
Injuries _____N/A

Name of Doctor _____

Where Injured _____

City, state _____

Taken _____

N/AN/A

Extent of

Damage Front of car - grill, bumper, headlightIf Auto Jeep State and IN Model Wrangler Description 4WD
Yr/Make of 1987 Miles 14,000 Plate No ██████████ Age 10Owner's Name Janet Jones Address 123 Main St. Phone ██████████Driver's Name Janet Jones Address 123 Main St. Phone ██████████

Where car _____

Property Be Seen? _____

WITNESSES (Include any additional occupants of car)

Name	Address	Phone	Year car	Other car	Pedes- trian	Occupant of

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

(over)

REPORT TO YOUR CAR

Page Damaged	Extent of Damage	Estimated Loss

Name of Party Causing Damage _____ Address _____
 Where May Car Be Seen? _____

→ DESCRIPTION OF ACCIDENT

Weather at time of accident: Sunny & clear Road condition dry/clear

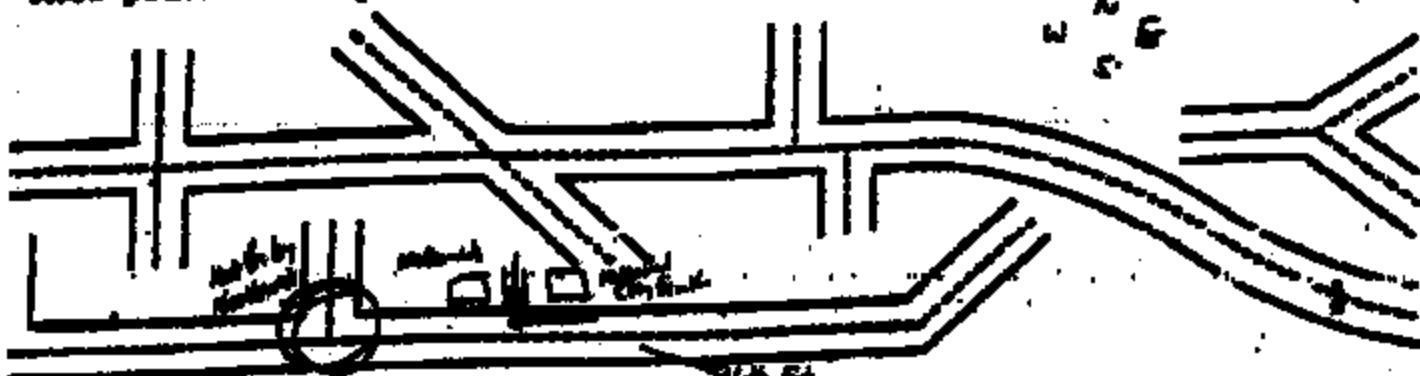
Direction of your car: West What side of street? right Rate of Speed 30-25 mph

If object collided with what What side of street? left Rate of Speed what? Was moving, in what direction? South of street? left Speed what?

What Traffic Signals or Controls Violated? None By whom? me

SHOW HOW ACCIDENT HAPPENED ON ONE OF THESE DIAGRAMS

Identify each car and direction by numbered arrow, then: 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, then: 2. Show direction and distance traveled after crash by dotted line: 3. Show pedestrian by small circle: 4. Railroads by ///////////////



Driver's account of accident: I was west bound on 9th St. 200 ft out of intersection of Main St. Northbound Mr. Bawali was in an out-of-control state driving center lane between 9th and Main St. I stopped my car to let him pass. As I drove past the entrance to the South St. National City Bank. Mr. Bawali attempted to cross west bound 9th St traffic then turning left to proceed east bound on 9th St. Mr. Bawali claimed he did not see the car I was driving. He attempted to stop his traffic broadsiding the rental car I was driving.

Do you think you were to blame? No

Owner's Signature _____ Driver's Signature _____

Today's Date 7/26/98

INDIANA OFFICE /S STANDARD CRASH REPORT

CRASH # 94-06-27124

Date: 06/27/94

150	700	550	90
Driver	Passenger	Front	Rear
On	Off	On	Off
Side			
Front	Side	Front	Side

200	67	Voltmeter	77.12
100	67		77.12
100	67		77.12
100	67		77.12

Same

Same

Driver	SV	Passenger	Driver Side
SV	SV	SV	SV
SV	SV	SV	SV



OWNER OF VEHICLE 1 (as listed above)	<input type="checkbox"/>
OWNER OF VEHICLE 2 (as listed above)	<input type="checkbox"/>
ADP	

Not To Seal
Without Court Order
To Amend



Glen Street

On 7-6-90 about 8:00 AM while en route to work left route and took 3rd St. After about three blocks went right around corner in the eastbound lane. He stopped a vehicle that he could see had a youth child in front left for occasion to do so and then went on. About 7:30 AM he was driving west on 3rd from 1st to 2nd when he saw a youth walking across the street for opportunity. He stopped his car and got out and as he was coming out of his car he saw a youth get out of the car and get behind the back of his vehicle. He stated he tried to avoid the collision but couldn't.

Stop Sign All Stop

1	2	3	4	5
6	7	8	9	10
11	12	13	14	15
16	17	18	19	20
21	22	23	24	25

Book *Editor's Note*

CSCN140

VEHICLE DATA

98/02/12 13:54:23

ENTER VIN ==> 1LNLM82WORY720247

NAME ==> [REDACTED]

ZIP ==> [REDACTED]

MODEL YR ==>

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

CITY : PARAGOULD

N/A DATE: 95-04-25

ST/PRV: AR CTRY:

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	DISTRICP	ZONE	DEALER	PDC CODE	FCSD	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

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 02

DSO DISTRICT :

FLEET CODE :

OPEN : 00 CLOSED : 02

DSO NUMBER :

FLEET STATUS :

ACTIVE: 02 HISTORY: 00

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

LPEMJ82

C8CN150

CAMPAIGN VEHICLE INFORMATION

98/02/12 13:54:29

ENTER CAMPAIGN NUMBER--> 94S89 VIN--> 1LNLM92W0RY720247 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: ADAPTER PLT. BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES

NEW STATUS CODE:

REPAIR INFORMATION: TYPE CODE: _____

REPAIR DATE: DEALER P/A: _____

MICRO REF: CLAIM NUM: _____

DELETE REASON:

RESP DEALER INFORMATION: NEW:

CURRENT: 1 23 606 ASSIGNED: 96-12-18 SOURCE: PX

CAMP DIV : 6

SUPP CODE :

KIT CODE : AA

OASIS DATE : 94-08-12

VENDOR N/A INFORMATION:

IND: MATCH CODE: 4

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 ZKC6001 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

LPENJ62

ENTER CAMPAIGN NBR ==> 94S89 VIM ==> 1LM1MS2W0RY720247
DEFECT : ADAPTER PLT. 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: H5001 FLEET MGMT LOC CODE: 2504
LAST NAME : 1502 INITIALS:
STREET ADDR1 : ST/PRV: IN
ADDR2 :

CITY : INDIANAPOLIS

ZIP/POSTAL CODE: [REDACTED]

N-A SOURCE: F N-A EFF DATE: 94-06-15

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 :

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
I048=LAST PAGE LPENJ92

CSCN150

CAMPAIGN VEHICLE INFORMATION

98/02/12 13:54:36

ENTER CAMPAIGN NUMBER--> 96L12 VIN--> 1LNLM82W0RY720247 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN SIGNATURE SERIES

NEW STATUS CODE:

REPAIR INFORMATION: TYPE CODE:

REPAIR DATE: DEALER P/A:

MICRO REF: CLAIM NUM:

DELETE REASON:

RESP DEALER INFORMATION: NEW:

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

VENDOR N/A INFORMATION:

IND: MATCH CODE: 4

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

E982-025 57485

HISTER CAMPAIGN NBR ==> 96L12 VIN ==> 1LNLM82W0RY730247
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 : [REDACTED] INITIALS: LS
STREET ADDR1 : [REDACTED]
ADDR2 :
CITY : PARAGOULD
ZIP/POSTAL CODE: [REDACTED]

CTRY: N-A SOURCE: P N-A EFP 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 :
ADDR2 :
CITY :
ZIP/POSTAL CODE:
F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140
I048=LAST PAGE

LPENJ82

FORD
MERCURY

Pannell Ford-Mercury, Inc.

1301 Hwy. 49 North
PARAGOULD, AR 72450
238-8546

FORD

PURCHASER'S
NAME _____

DATE 04-25-95

ADDRESS _____

PARAGOULD, AR _____

YEAR 94	MAKE LINCOLN	MODEL & TYPE TOWN CAR 4DR	COLOR SILVER
STOCK NO. 82478	1LNLM82WRY720247		MILEAGE 15536
INCLUDING:	<input type="checkbox"/> Radio <input type="checkbox"/> Heater <input type="checkbox"/> Automatic Transmission <input type="checkbox"/> Power Steering <input type="checkbox"/> Power Brakes <input type="checkbox"/> Power Seats <input type="checkbox"/> Power Windows <input type="checkbox"/>		
	CASH PRICE \$ 24900.00		
	TRADE IN ALLOWANCE 12150.00		
	TRADE DIFFERENCE 12750.00		
	WARRANTY N/A		
	TOTAL TAXABLE 12750.00		
1LNLM81WNY623735			
DESCRIPTION OF TRADE-IN			
YEAR 92	MAKE LINCOLN	TITLE RECEIVED BY IF NOT WRITE	N/A
7668000000	66808		
TRADE-IN ALLOWANCE		\$ 12150.00	
Less Bal. Owed To		N/A	
Equity		\$ 12150.00	
Plus Cash Paid on Delivery		12750.00	
TOTAL DOWN PAYMENT		\$ 24900.00	
		SALES TAX N/A	
		FEES N/A	
		TRADE PAYOFF N/A	
		REBATE N/A	
		CASH DOWN	TOTAL \$ 12750.00
		REF N/A	
		BALANCE DUE \$ N/A	
INSURANCE	DISCOUNTS	OPTIONAL	AMOUNTS
NO. OF MONTHS			
REMARKS: 7/33 ⁵ #687 Keyless Entry			
BALANCE TO BE FINANCED			
COST OF FINANCING			
TOTAL NOTE \$			
CONTRACT PAYMENTS AT \$			
FIRST PAYMENT DUE			

PANNELL FORD & MERCURY SALES USED CAR LIMITED WARRANTY
MUST BE PRESENTED AND SIGNED AT TIME OF REPAIR

All repairs to be done in our shop. Customers to receive a 50% discount on labor and be allowed to purchase parts at Pannell Ford & Mercury at our cost plus 10% handling for a period of _____ days of _____, whichever occurs first. No warranty is given on body repairs, speedometer readings, or trade accessories. Checking and replacing antifreeze is also the responsibility of the purchaser. NO ORAL REPRESENTATIONS HAVE BEEN MADE TO ME AND THERE IS NO OTHER WARRANTY EITHER INTENDED, OR IMPLIED UNLESS EXPRESSLY STATED HEREIN.



S82

KEY: UNLESS INDICATED BY A CODE, PARTS REMANUFACTURED, ALL
PARTS USED IN THIS REPAIR ARE NEW AND UNUSED.

278836

2427	44	7-C	1000	1000	1000	1000
------	----	-----	------	------	------	------

SERVICE TIME NO.

CUST. NAME & I.D.

NAME

23406 DWOOD 36688
EMP 23

STAPLE
ATTACH-
MENTS
HERE

PANNEAU FORD-MERCURY
ROUTE 4 BOX 12
PANAGOULD AB 32443

RECEIVED PAYMENT
AMOUNT RECEIVED
AMOUNT DUE
AMOUNT PAID

PROGRAM CODE APPROVAL CODE OR NO. CONSIGNMENT CODE

DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT

DATE MILEAGE (END TRIMMING)

NO. DAY YR.

DATE AND MILEAGE AT TIME OF VEHICLE RELEASE

DATE MILEAGE (END TRIMMING)

NO. DAY YR.

PART NUMBERS

NAME OR PARTS

CONDITION

LABOR OPERATION NO.

TIME

AMOUNT

CUSTOMER DESCRIPTION OF CONCERN

CUSTOMER CONSIGNMENT CODE - TECHNICIAN OPERATING

32443

15N2 9H305

1100

56

9422048

2 74

REASON FOR

15N2 9F715

1100

1

1265003

15 11.67

REASON FOR

1

1

15650E

1 373

REASON FOR

1

1

15650E1

4 1494

REASON FOR

1

1

15650E11

11 373

REASON FOR

2

3

LABOR RATE

TECHNICIAN SOCIAL SECURITY NUMBER (LAST 4 NUMBERS)

REPAIR 1 \$ 55.2

REPAIR 2

REPAIR 3

TOTAL

48.59

TOTAL

TOTAL

TOTAL

TOTAL

TOTAL

TOTAL

I, the undersigned, for Loss or Damage to Vehicle or Articles left in vehicle in course of service, do on my own behalf, represent and declare, I hereby acknowledge that above repair work has been done to the satisfaction of the customer, and hereby give you notice your responsibility ceases to concern the vehicle described on sheet. I further declare that no damage or otherwise to the vehicle or articles in my possession, or to the property of the customer, has been caused by me or my employees.

1117 8-795

TECHNICIAN CODE
INCLUDE DESCRIPTION OF CHARGE

REPAIR

COM-
MUNI-
TION
CODE

PARTS RETURN

ITEM
NO.

LABOR RECORD

ITEM
NO.
DURATION
OF WORK
TIME

TIME CLOCK

ON

OFF

1

REPAIR

M7 NO
240 SWL 952000 19824

REPAIR

3

0002-0225 57418

PRINTED ON 05/01/2011

***** START OF FILE *****

08-07-95 08:09:26A

Vehicle Entered

VIN: 1tNLM82W0RY720247

Odo: 20,704

1994 Town Car 4 Door Sedan Signature Series 4.6L SOHC (MODULAR)

08-07-95 08:09:53A

Electronic Engine Control - KOEO Self-Test Selected

15650E1

Code Display

The Codes Returned: KOEO 111 CONTINUOUS 111

08-07-95 08:10:34A

Electronic Engine Control - KOER Self-Test Selected

15650E1

Key On Engine Running Test

Code Display

The Codes Returned: KOER 111

***** END OF FILE *****

KEY: UNLESS INDICATED BY OTHERWISE, ALL PARTS USED IN THIS REPAIR ARE NEW AND UNREFURISHED.

278499

21210	156	6170A	616336	3606 06009-7 38688	MP 23
				MANCOL FOND+MERCURY	
				ROUTE 6 BOX 32	
				ARAGUAZO AR 72450	

STAPLE

ATTACH-
MENTS
HERE

VEHICLE CODE / VEHICLE CODE OR NO. / CONVENTION CODE

DATE AND MILEAGE AT TIME OF VEHICLE PURCHASE

DATE / MILEAGE AND TERRAIN

DATE AND MILEAGE AT TIME OF VEHICLE RELEASE

DATE / MILEAGE AND TERRAIN

PART NUMBERS

PART #	DESCRIPTION	NAME OF PARTS	CONSTRUCTION	LABOR OPERATION NO.	TIME	REASON	CONSTRUCTION OPERATION OF OPERATION
487 341208	Exhaust	1	54	M.	V + 10	12	10 day 10 am
1							End Day 5pm
2							Start and End at 12pm
3							10 day 10 am
							End Day 5pm
							10 day 10 am
							End Day 5pm
							10 day 10 am
							End Day 5pm
							10 day 10 am
							End Day 5pm

LABOR RATE

TECHNICIAN SOCIAL SECURITY NUMBER (LAST 4 NUMBERS)

REPAIR 1	31243			
REPAIR 2	30433			
REPAIR 3				

REPAIR 1	31243			
REPAIR 2	30433			
REPAIR 3				

TECHNICIAN COMMENTS
INCLUDE DESCRIPTION OF CHARGE

REPAIR

COND-
ITEM
CODE

PARTS RETURN

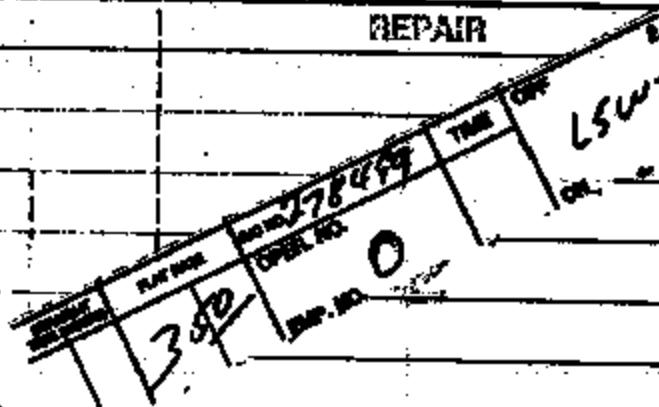
LABOR RECORD

EMP.
NO.CONT'D
ELECTRO
TIME

TIME CLOCK

ON

OFF



REPAIR

3

99

THANK YOU FOR USING THE OASIS/EDSR MENU SYSTEM

05/09/95 14:17:40

DISCONNECTED FROM FORD COMPUTER 08909

THANK YOU FOR TYPING BYE, THIS HELPS TO REDUCE LOGIN TIME FOR OASIS/EDSR.

PLEASE TURN OFF YOUR TERMINAL...

Please log in:

707

? Dial: (ENTER NAME OR NUMBER) "0"
15019357957

ple
ase type your termi
-7464:01-013-

please log int: FPSTDTY

password: 4

05/09/95 16:25:07 *** FORD PARTS AND SERVICE *** RS83L011
APPLICATION IDENTIFICATION

PLEASE ENTER APPLICATION ID FOLLOWED BY REQUIRED APPLICATION INFORMATION

OASIS, 060094

OASIS MENU - PANNELL FORD-MERCURY INC

05/09/95 16:25:22

1. VEHICLE INFORMATION
2. VEHICLE AND 100 DAY WARRANTY REPAIR INFORMATION
3. SERVICE CODE INFORMATION
4. ESP BASE PART NUMBER VERIFICATION
5. BROADCAST MESSAGES
6. E D S R - ELECTRONIC DEALER SERVICE REPORT
99. DISCONNECT FROM OASIS

ENTER SELECTION NUMBER <RTN>

3

05/09/95 16:25:34

ENTER VIN, SERVICE CODE <RTN>

M. MENU 1-6. MENU SELECTION NUMBER
LNLM82W0RY720247

99. BYE

1994 TOWN CAR

05/09/95 16:26:16

4.6L SOHC (MODULAR) 41BJR00A AODE 4 SPEED OD
•OPEN RECALLS

AXLE CODE: 1

ENR-925 57414

NO RECALLS FOR VEHICLE

•WARRANTY START DATE 03/29/94 BUILD DATE 03/14/94 START MILEAGE
•EXTENDED SERVICE PLAN
NO ESP INFORMATION AVAILABLE

ENTER VIN, SERVICE CODE <RTN> OR SVC CODE <RTN> FOR 94Y720247
M. MENU 1-6. MENU SELECTION NUMBER 99. BYE
303000

05/09/95 16:26:16

STEERING/HANDLING

05/09/95 16:26:36

THERE ARE NO SSMS FOR SYMPTOM ENTERED.

05/09/95 16:26:37

•TECHNICAL SERVICE BULLETIN

05/09/95 16:26:37

T1 93-26-05

STEERING-POWER-NOISE, AIR IN SYSTEM-PROCEDURE TO PURGE AIR FROM SYSTEM

FOR A TSB SUMMARY ENTER TSB NUMBER <RTN> (EG: T1) OR <RTN> FOR NEW SYMPTOM
M. MENU 1-6. MENU SELECTION NUMBER 99. BYE

ENTER VIN, SERVICE CODE <RTN> OR SVC CODE <RTN> FOR 94Y720247
M. MENU 1-6. MENU SELECTION NUMBER 99. BYE
304000

05/09/95 16:27:10

SUSPENSION SYSTEM

05/09/95 16:27:17

THERE ARE NO SSMS FOR SYMPTOM ENTERED.

05/09/95 16:27:17

•TECHNICAL SERVICE BULLETIN

05/09/95 16:27:18

T1 94-21-02

AIR SUSPENSION-HUM NOISE WHEN VEHICLE IS FIRST OCCUPIED & LEVELING

FOR A TSB SUMMARY ENTER TSB NUMBER <RTN> (EG: T1) OR <RTN> FOR NEW SYMPTOM
M. MENU 1-6. MENU SELECTION NUMBER 99. BYE

ENTER VIN, SERVICE CODE <RTN> OR SVC CODE <RTN> FOR 94Y720247
M. MENU 1-6. MENU SELECTION NUMBER 99. BYE
30400000

05/09/95 16:27:53

PUBLICATION REVISIONS/UPDATES

05/09/95 16:28:15

•SPECIAL SERVICE MESSAGE 3598

05/09/95 16:28:15

THE FOLLOWING ACTUATOR AND DETECTIVEING CODES FROM THE TCM BASIC SYSTEMS TO BE USE

0902-025 57415

62501

PANNELL FORD-MERCURY, Inc.
1301 HWY 49 N
PARAGOULD, ARKANSAS 72450
(501) 236-8546

4.21.75	
LINCOLN	94
T-C.	
PA	755560
AM PM	AM PM
CH. OIL & FILTER	CH. OIL & FILTER
PAINT	PAINT
WINDSHIELD WIPER	WINDSHIELD WIPER
WHEELS	WHEELS

USE CAR DEPT

PARAGOULD

JLNEM82W08Y720247

93 SAFETY INSPECTION

350

LUBRICATION	<input type="checkbox"/>
CHANGE ENGINE OIL	<input type="checkbox"/>
CHANGE OIL FILTER	<input type="checkbox"/>
CLEAN AIR FILTER	<input type="checkbox"/>
REPLACE FUEL FILTER	<input type="checkbox"/>
CHANGE TRANS. OIL	<input type="checkbox"/>
RE-MOUNT TIRES	<input type="checkbox"/>
RE-STOCK FRONT WHEELS	<input type="checkbox"/>
TIME-UP BRAKES	<input type="checkbox"/>
ALARM PROSTY PAD	<input type="checkbox"/>
ROTATE TIRES	<input type="checkbox"/>
ROUNTY SERVICE	<input type="checkbox"/>

SUBLET WORK

ACCOUNT AMOUNT

TOTAL B&M. LABOR-CARRY TO REINT COL.

FORWARD →

350

GAS, OIL & LUBRICANTS
GALL. GAS @NOT RESPONSIBLE FOR LOSS OR DAMAGE TO CAR OR PERSONNEL
NOT RESPONSIBLE FOR LOSS OF TIME, TRAVEL OR ANY OTHER COST
DUE TO CONVENTION.

GALL. OIL @

LINE,
LUBRICANT @

TRANS. OIL

I hereby acknowledge the above labor work to be done along with the
necessary materials, and hereby grant you another one hundred days
from completion to repair the car or have been entitled to services
expended or rendered for the purpose of making proper restoration. An
amount of money's due is hereby acknowledged on above car or truck
to receive the amount of repairs thereof.TOTAL
LABORSUBLET
WORKGAS, OIL
& LUBRICANTSTOTAL
PAST DUEADDED
BROKERS

SUB TOTAL

TAX

TOTAL

0902-628 57417

ITEM	QUANTITY	DESCRIPTION	PRICE
1	7L820	oil filter	425
5	5W30	oil	625
			<i>W/18.8W/1</i>

Maurie Vick
PANNELL FORD-MERCURY, Inc.
 1301 HWY 49 N
 PARAGOULD, ARKANSAS 72450
 (501) 236-0548

61318

2-1-84

<i>Per</i>	<i>1994</i>
<i>76cm</i>	
<i>3174m</i>	<i>15546</i>
ALL PROGRESS	
ALL TIME	
LAST DRIVEN	
CARS	
TRUCKS	
TRACTORS	
VEHICLES	
TOTAL HRS	

Dad Co 31

0

3-24-84

16ULM82W0R Y720.247

*Pay Freight house & do all you have
 (about) car from home 200
 Total car from 400 below 2400
 Cut off 800*

LUMBER

 STAIN

 PAINT

 GLASS

 AIR FILTER

 AIR COMPRESSOR

 CHROME

 ENGINE

 REPAIR

 PARTS

 PAINT

 REPAIR

 REPAIR

 REPAIR

 REPAIR

 REPAIR

 REPAIR

104-71335

ACCOUNT	AMOUNT	TOTAL GEN'L LABOR-CARRY TO FRONT COL.				FORWARD →
		100	200	300	400	
TOTAL LABOR						<i>1050</i>
BALLET WORK						
GAS, OIL & LUBRICANTS						
TOTAL PARTS						
ADMISSION COMMISSION						
SUB TOTAL						
TAX						
TOTAL						

GASOLINE
GALL. 8.00

OIL, OIL #

LIQUID CAST

TRANS. OIL

*RECEIVED BY THE OWNER OF THIS VEHICLE FOR THE SUM OF
 \$100.00 DUE TO THE SERVICE PROVIDED ON THE DATE
 INDICATED. THIS RECEIPT IS A REC'D OF PAYMENT FOR THE
 SERVICES RENDERED AND NOT A RELEASE FROM LIABILITY FOR
 ANY DEFECTIVE CONDITIONS WHICH MAY EXIST IN THE VEHICLE.
 THIS RECEIPT IS NOT AN ASSURANCE THAT NO DEFECTS EXIST.
 THE OWNER IS ADVISED TO EXAMINE THE VEHICLE CAREFULLY
 PRIOR TO PAYING FOR THE SERVICES PROVIDED.*

