

EA02-025

FORD 10/27/03

APPENDIX M

BOOK 17 OF 22

PART A-D

PART A

480390

SNORTON1
MS

026/03

026-025 18205

02

Ford Motor Company

Office of the General Counsel

PRIVILEGED AND CONFIDENTIAL

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126-2500

June 25, 2003

Grotefeld & Denenberg, LLC
105 West Adams Street, Suite 2300
Chicago, IL 60603
ATTENTION: PATRICK R. GAREIS

Re: Claimant: [REDACTED]
D/E: April 24, 2003
Y/Claim #: [REDACTED]

Dear [REDACTED]

As you may be aware our expert inspected the vehicle and fire scene. His review revealed no evidence of a design or manufacturing defect present, which would have caused the accident to occur as alleged.

Therefore, we must respectfully deny this claim.

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

Sincerely,

Shawn L. Norton
Claims Analyst

EA02-025 10007

**GROTEFELD
& DENENBERG, LLC**

Highland Park, MI
Chicago, IL
Pompano, FL
San Francisco, CA

The Clark Adams Building
105 West Adams Street
Suite 2300
Chicago, Illinois 60603

Telephone: (312) 551-0200
Facsimile: (312) 601-2422

Patrick R. Garab
Admitted in IL
(312) 601-2575
prg@gd-llc.com

May 1, 2003

Via Facsimile (312) 390-2107

Ms. Shawn Norton
Ford Motor Company
c/o Office of General Counsel
Park Lane Road, Tower West, Suite 400
Three Park Lane Blvd
Dearborn, MI 48126

RECEIVED MAY 2 2003

Re: Allstate Insured: [REDACTED]
Claim No.: [REDACTED]
Date of Loss: 04/24/03
Our File No.: 84.000144

Dear Ms. Norton:

Please be advised that this firm represents Allstate Insurance Company with regards to a fire that occurred at the home its insured, [REDACTED] on the above captioned date at the [REDACTED] Jackson, MS [REDACTED]. Based upon the results of our investigation, the cause of the fire is the result of a malfunction in the speed control deactivation switch in a 1994 Lincoln Towncar parked in the attached garage of the [REDACTED] home. The Vehicle Identification Number is 1LNLM82W8RY685277. The resulting fire communicated to other materials in the garage. The fire in the vehicle then communicated to the garage and to the rest of [REDACTED] residence.

The purpose of this letter is to place Ford Motor Company on notice that Allstate intends to seek recovery from Ford for the total amount of monies paid to [REDACTED] pursuant to the fire insurance policy. The automobile and fire scene are presently secured. Should Ford wish to examine the fire scene and the remains of this vehicle, please contact the undersigned and we will arrange for a joint inspection by Ford's representatives and Allstate's experts. However, if Ford does not wish to participate in this inspection or you do not respond by Thursday, May 8, 2003, the fire scene will then be repaired. The vehicle will then be the subject of disassembly and possible destructive testing.

88881 825 2282

Ms. Shawn Norton
May 1, 2003
Page 2

Thank you in advance for your time and understanding in this matter.

Very truly yours,

GROTEFELD & DENENBERG, L.L.C.



Patrick R. Gareis

PRG/wll
cc: William West
Mark S. Grotenfeld

**GROTEFELD
& DENENBERG, LLC**

Bingham Farms, MI
Chicago, IL
Hawthorne, NJ
San Francisco, CA

The Clark Adams Building
105 West Adams Street
Suite 2300
Chicago, Illinois 60603
Telephone (312) 551-0200
Facsimile (312) 601-2402

Patrick R. Gareis
Admitted in IL
(312) 601-2375
prg@gd-llc.com

May 1, 2003

Via Facsimile (312) 390-2107

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Ford Motor Company
c/o Office of General Counsel
Park Lane Road, Tower West, Suite 400
Three Park Lane Blvd.
Dearborn, MI 48126

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Ms. Shawn Norton
May 1, 2003
Page 2

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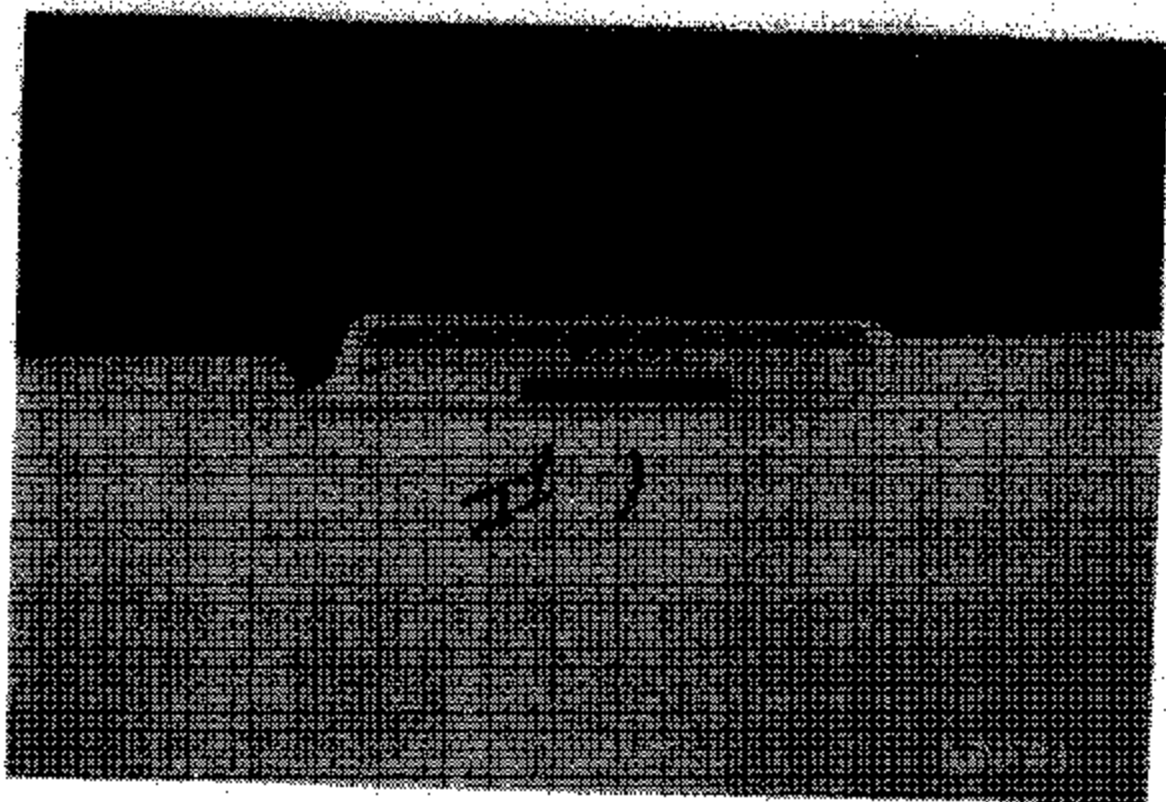
GROTEFELD & DENENBERG, L.L.C.



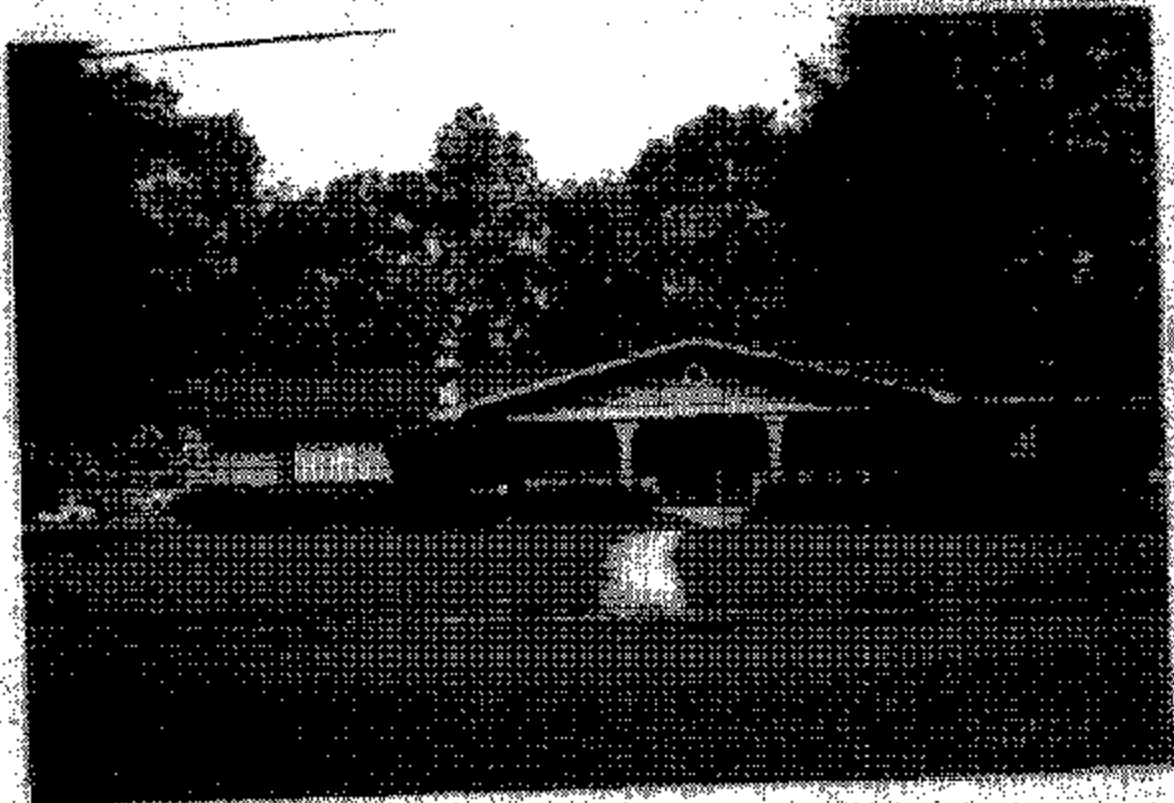
Patrick R. Garcia

PRG/wll

cc: William Weed
Mark S. Grotefeld



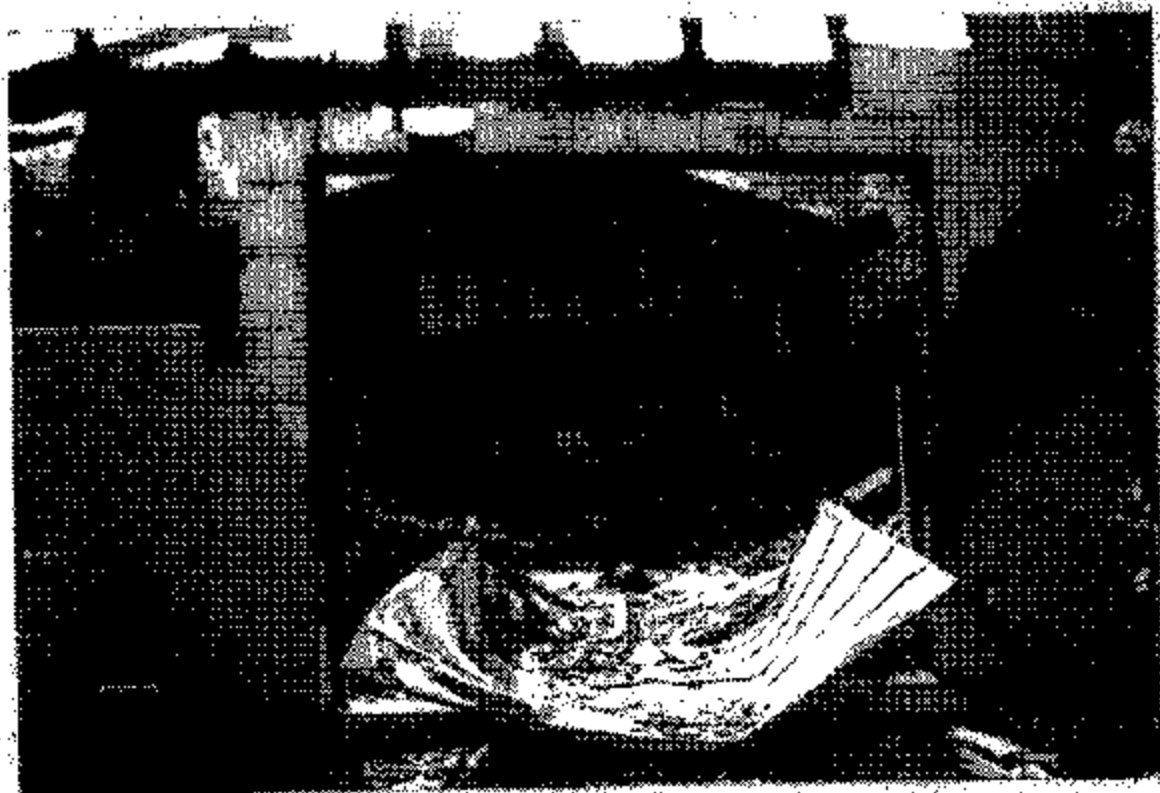




0002-025 18854









EAB2-028 18898



ENCLOSURE 10390



ENC-025 15000

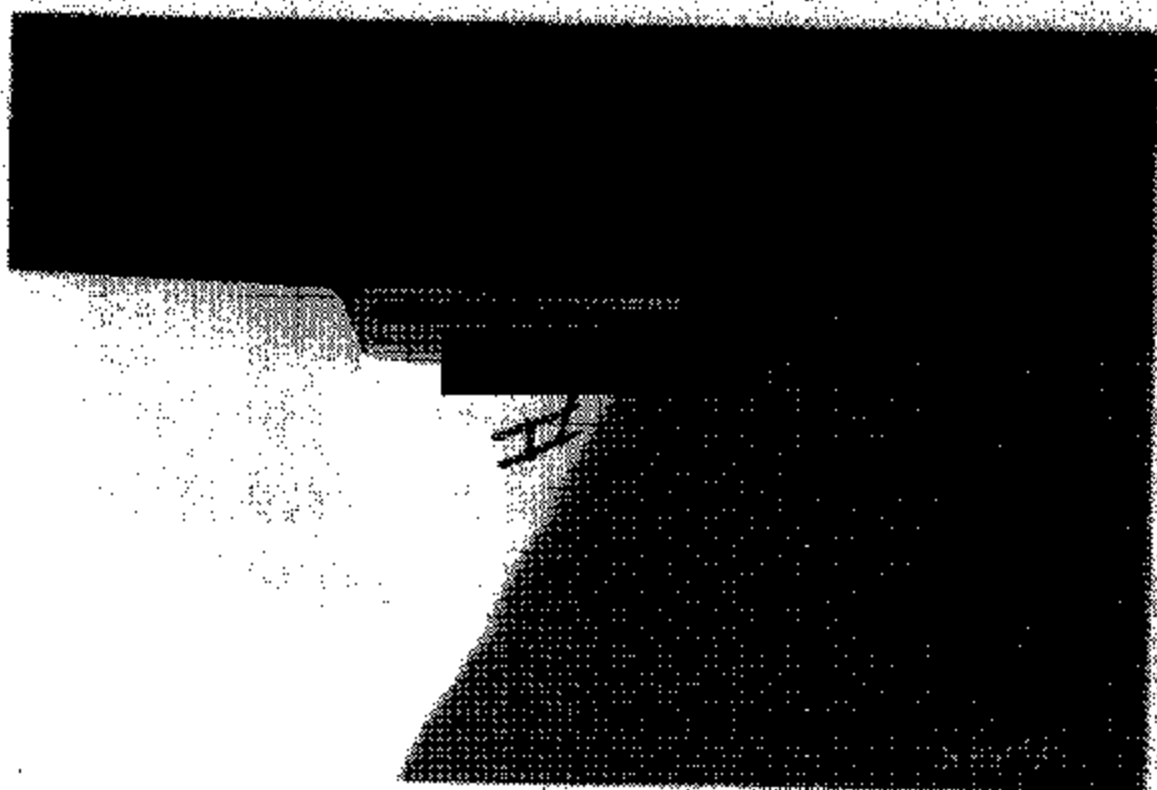
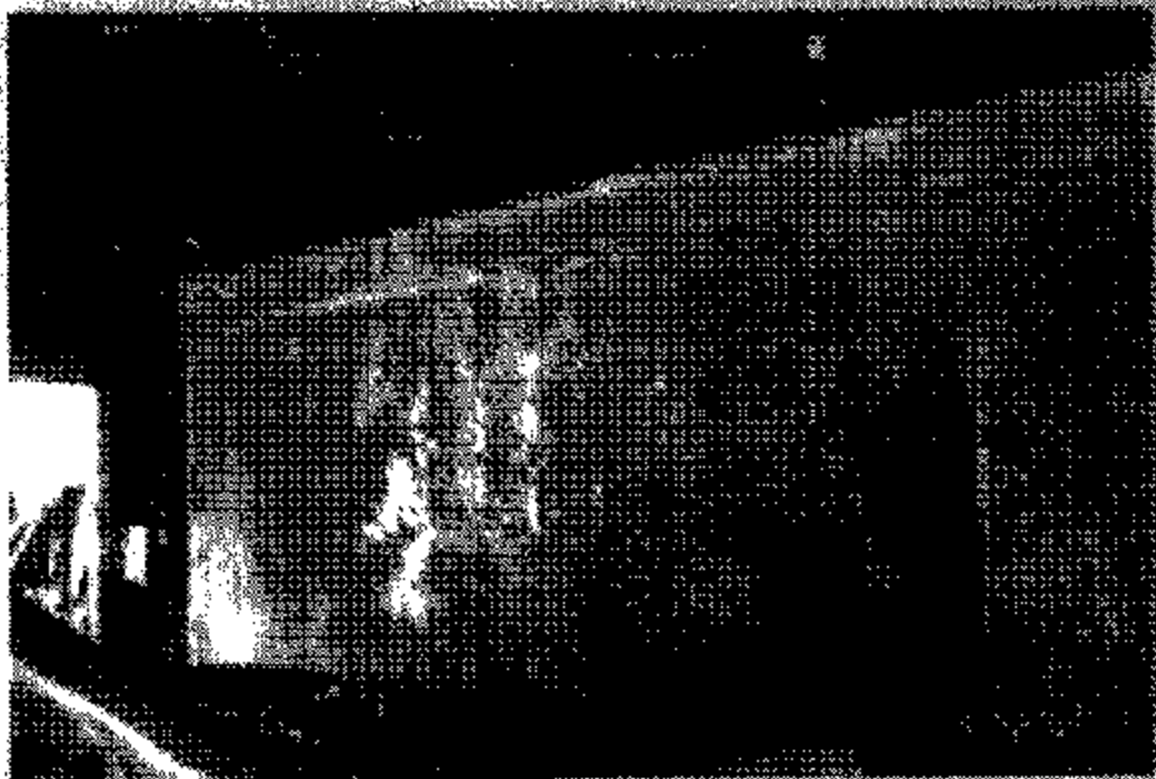


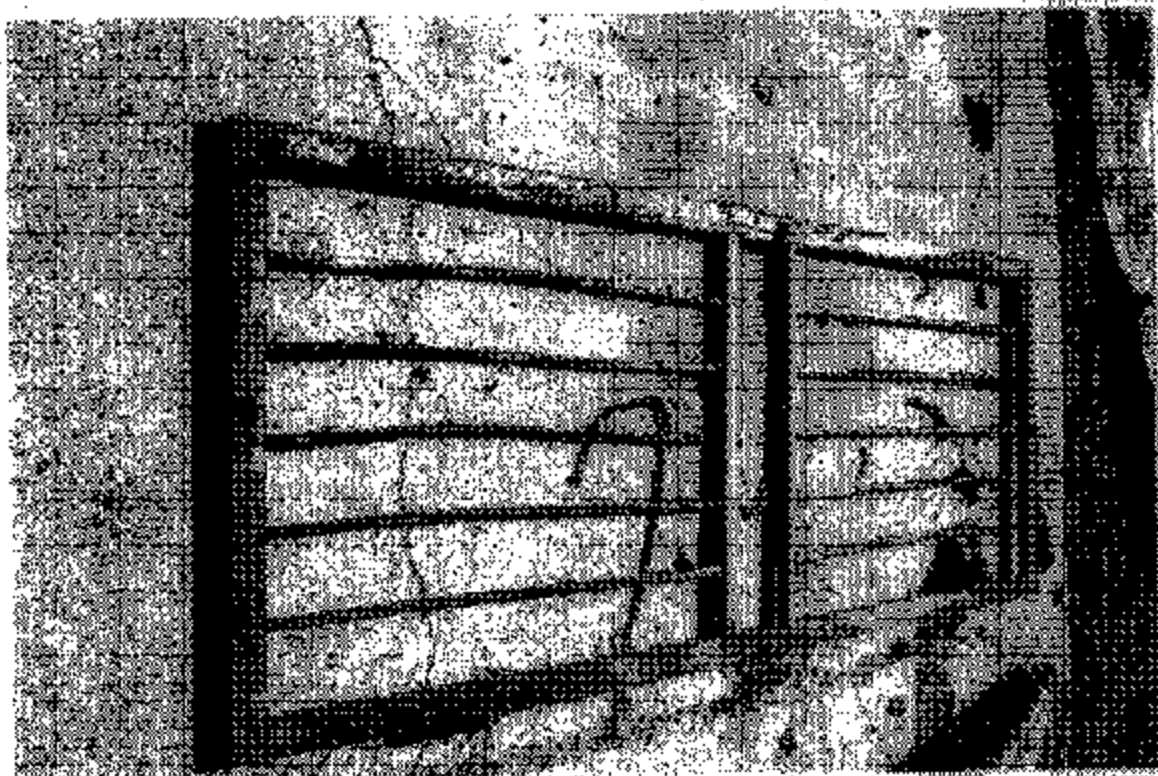
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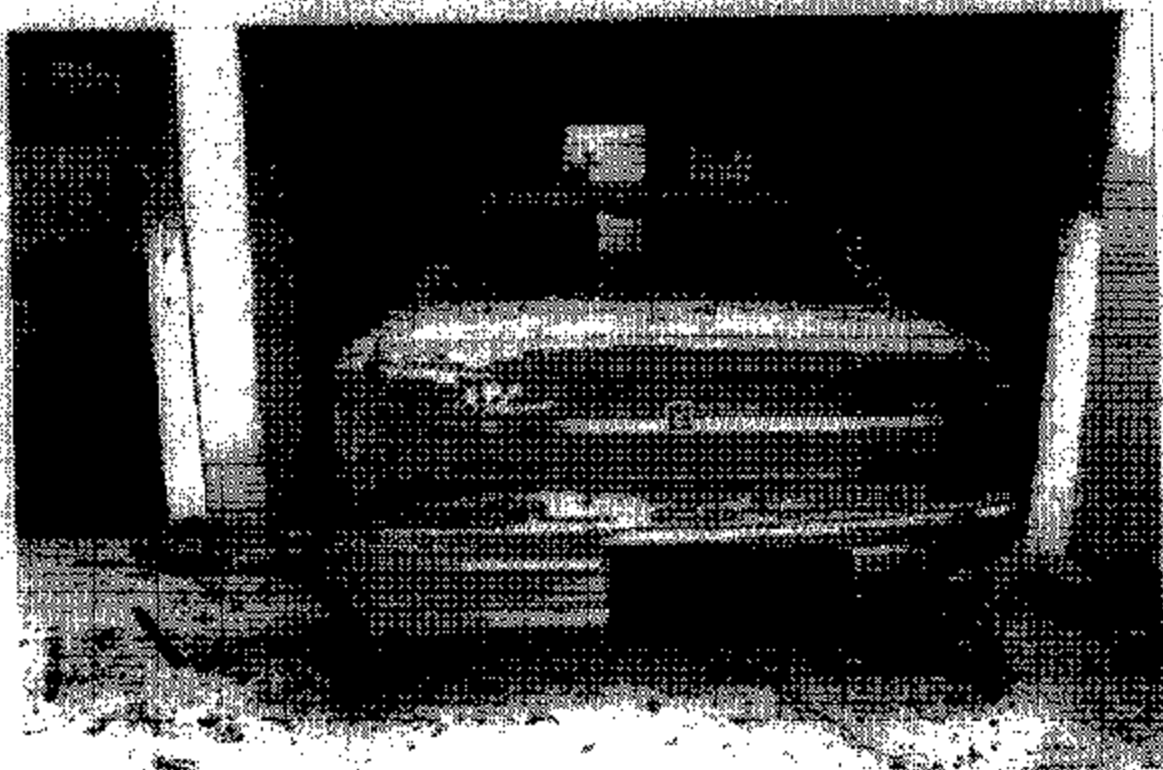




ER82-028 18883



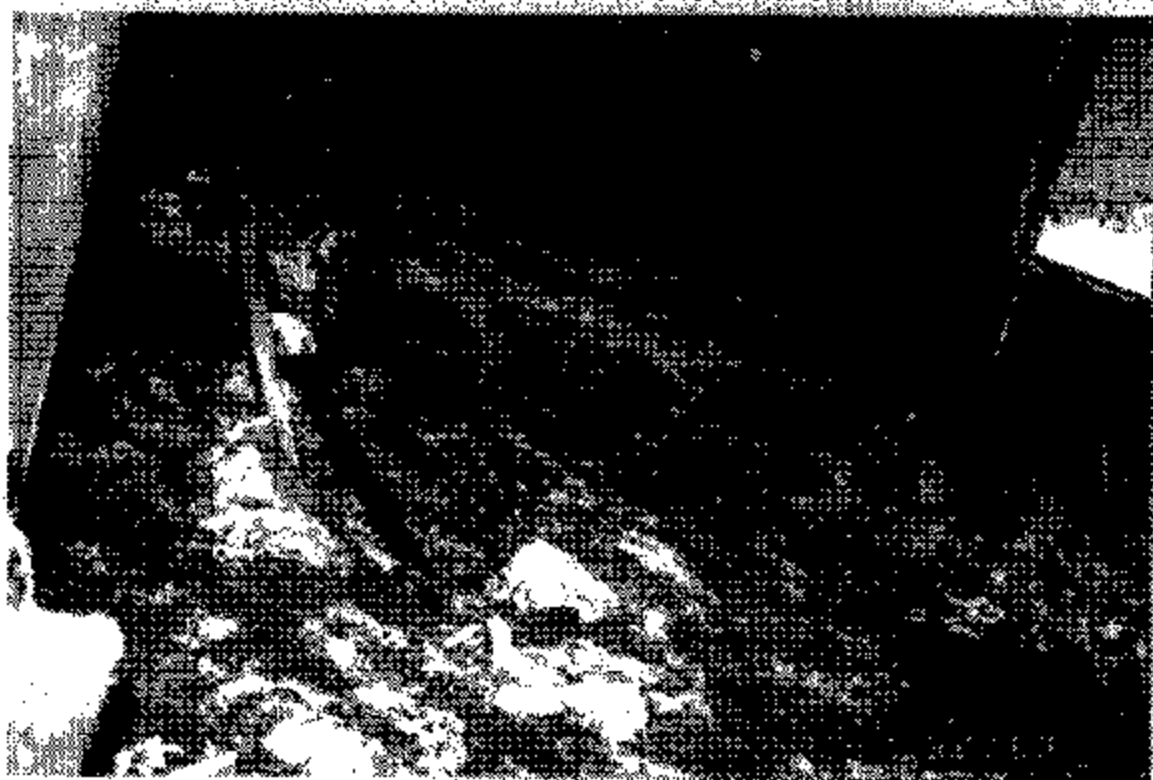




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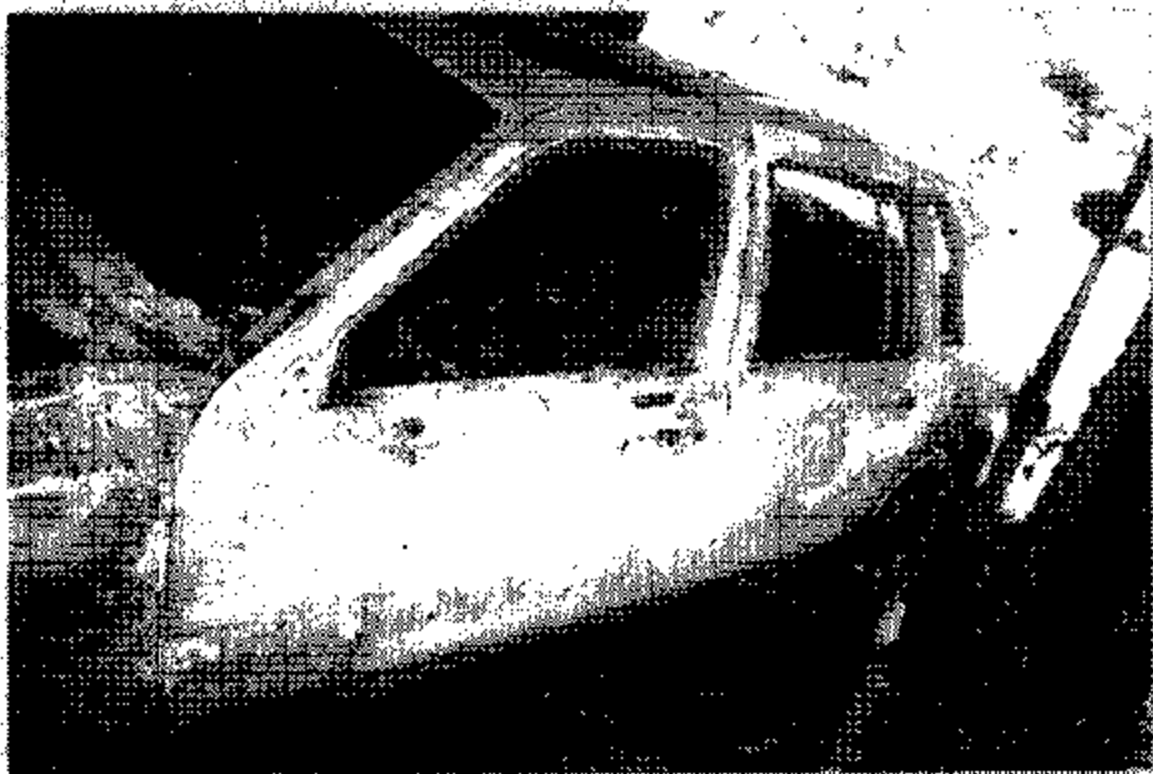
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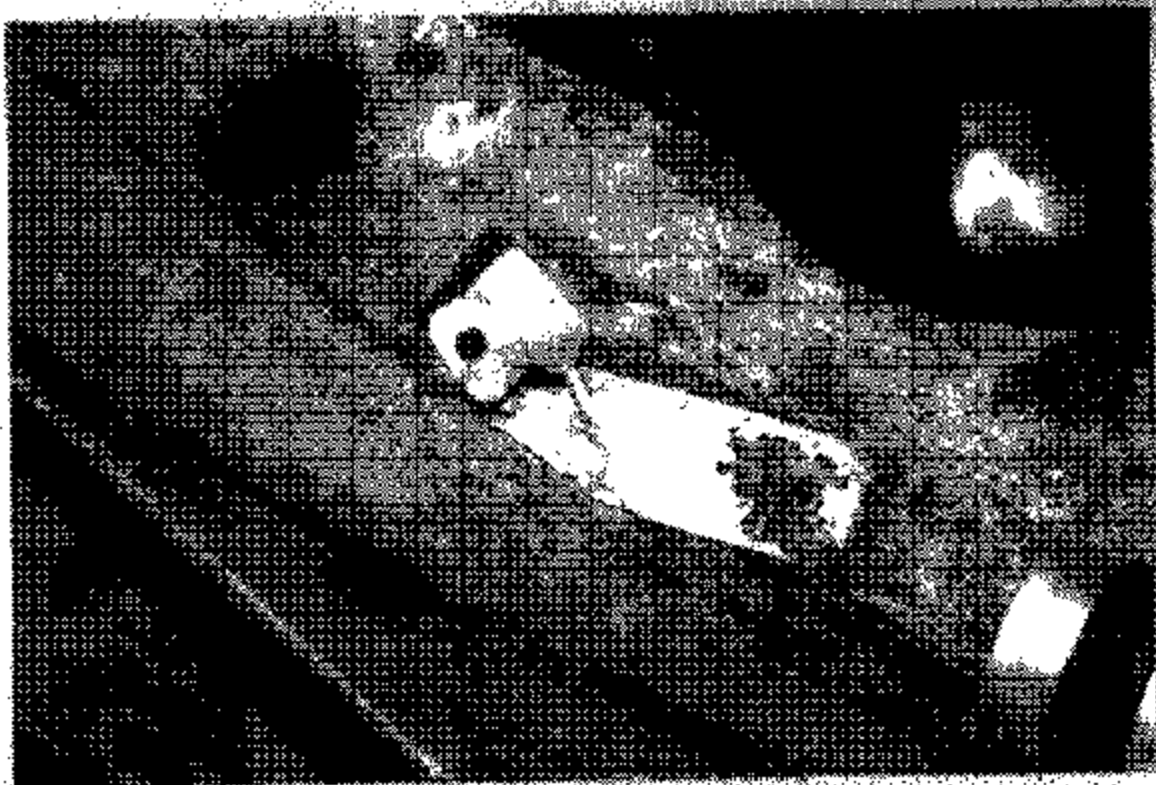
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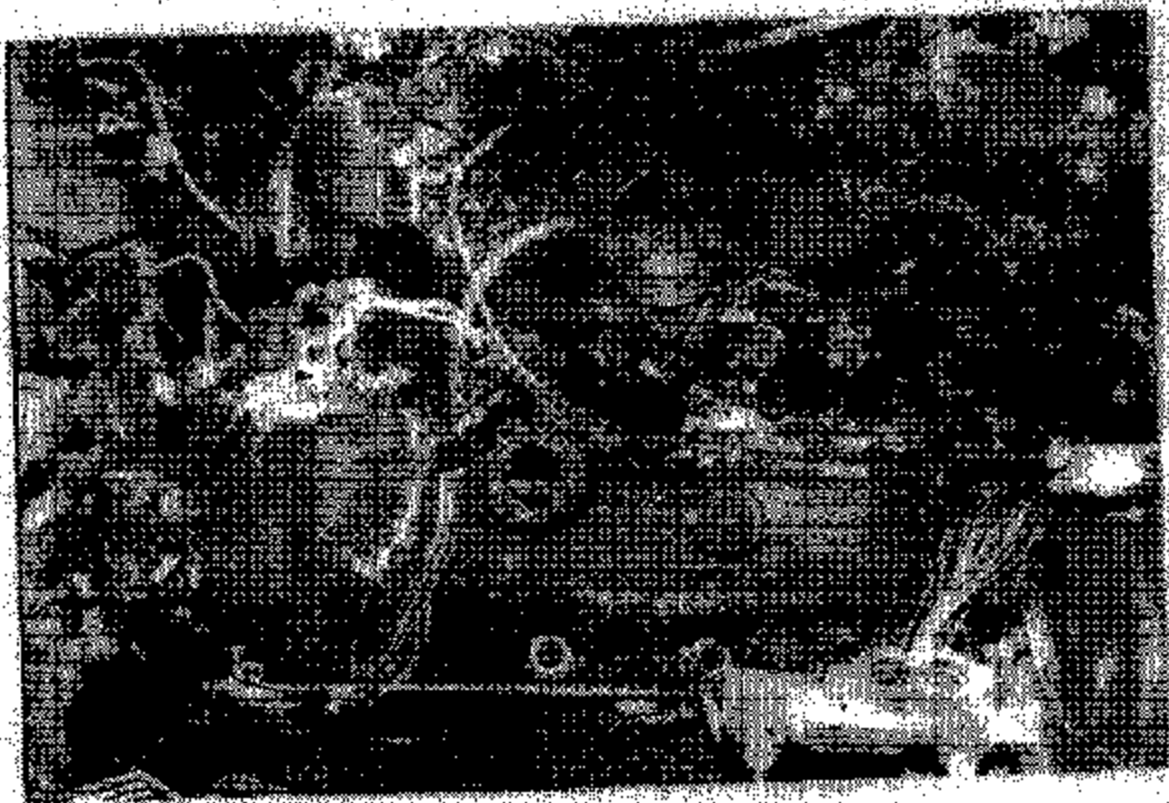
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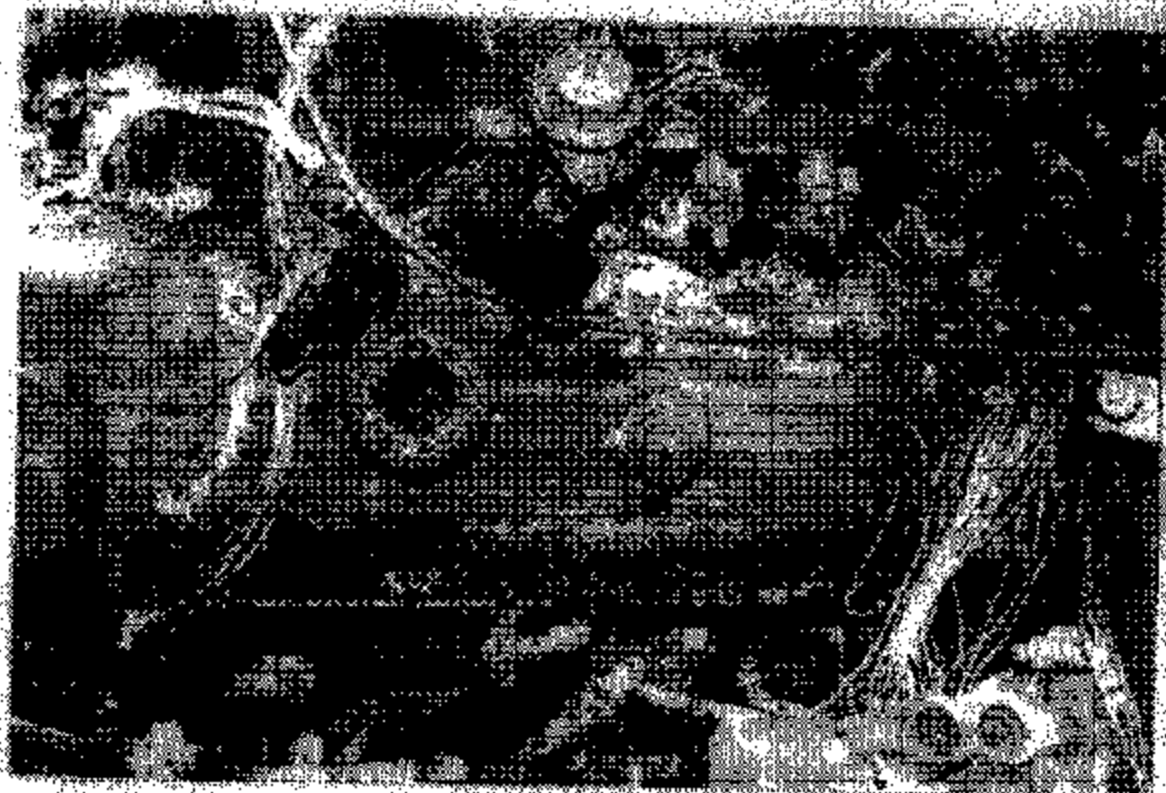


EQ02-825 18910









HR02-025 18914







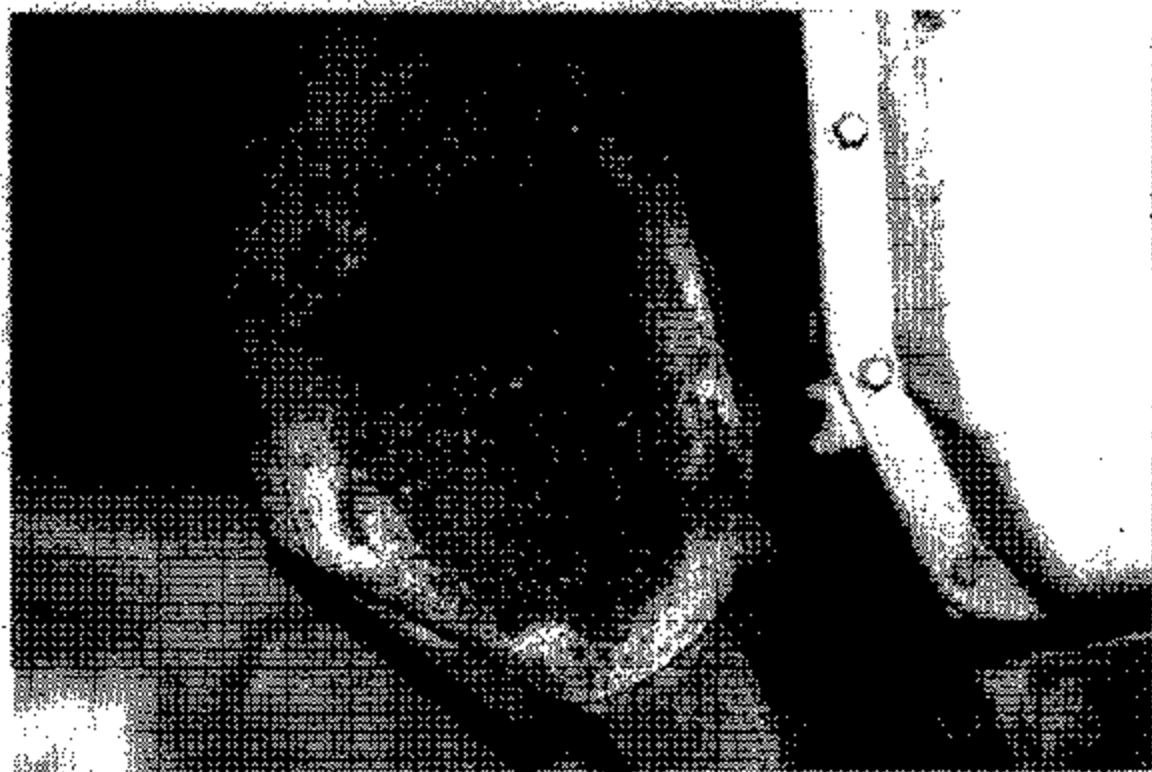


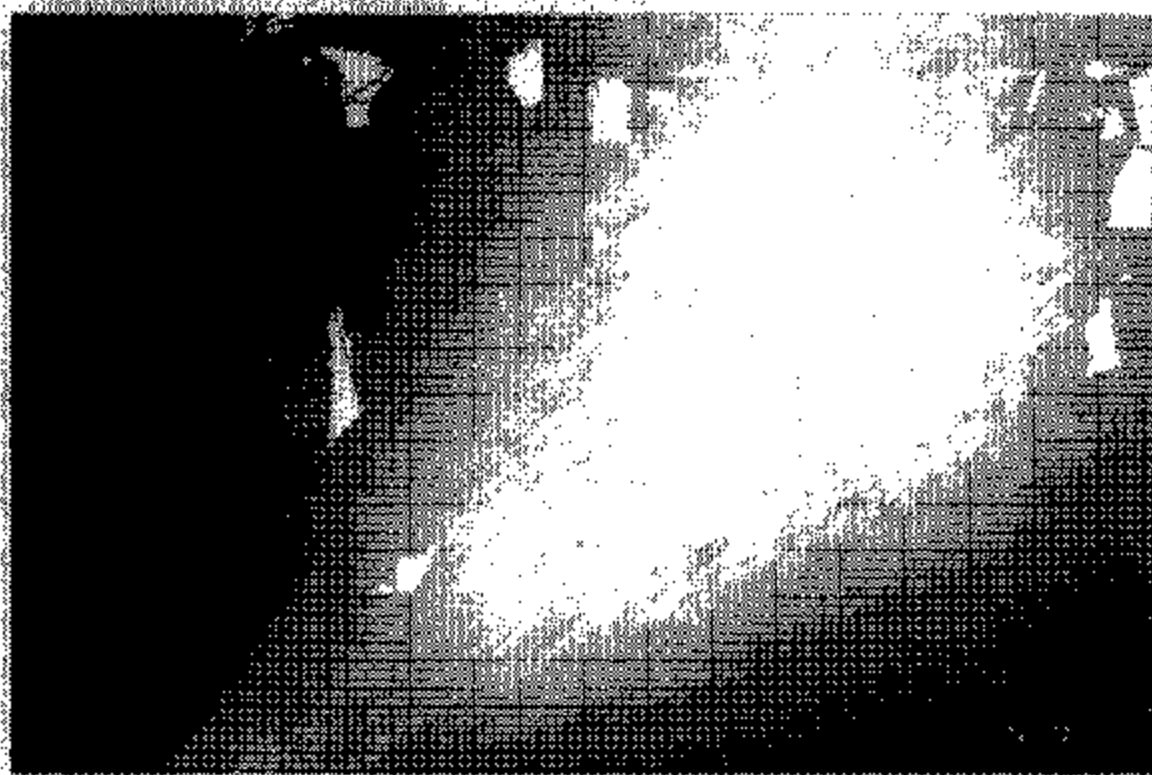




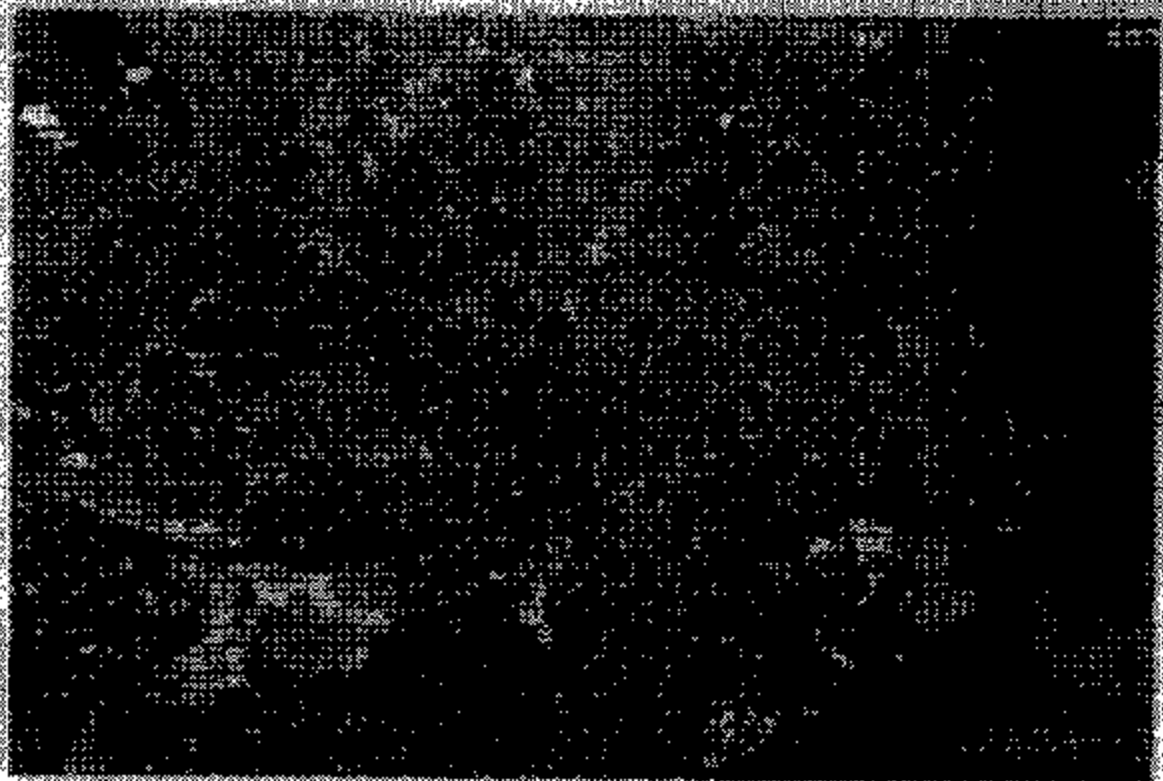






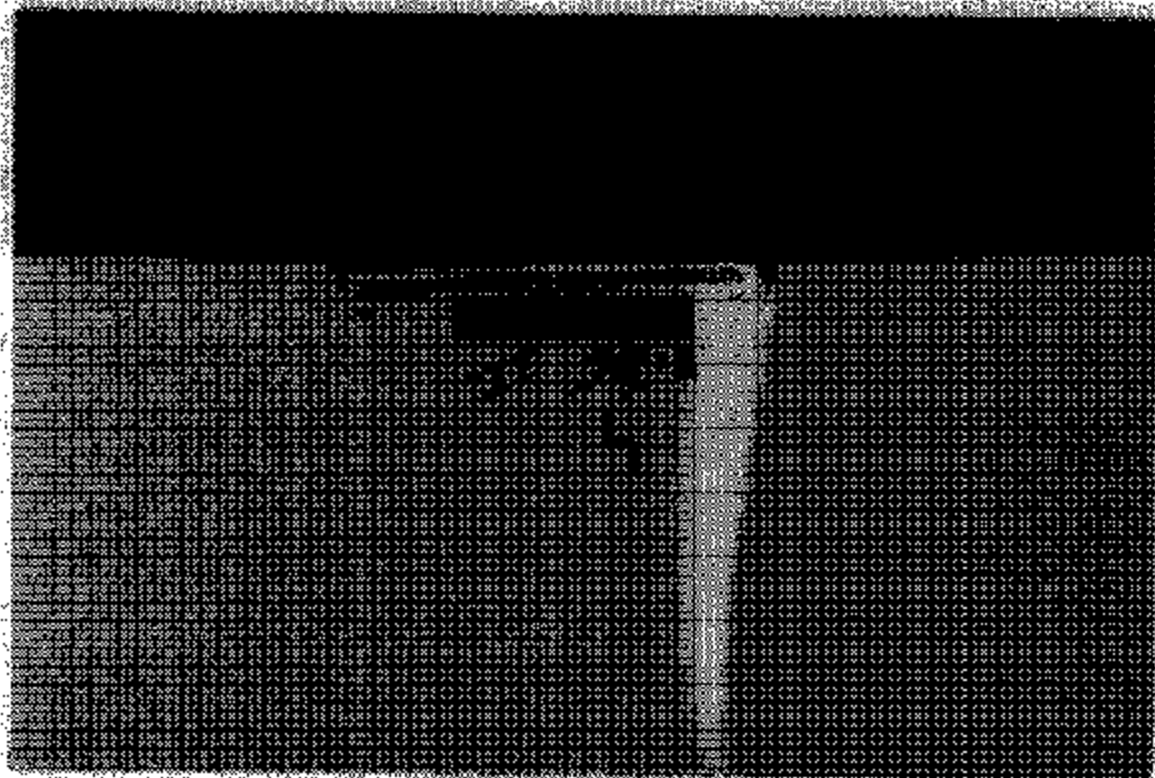


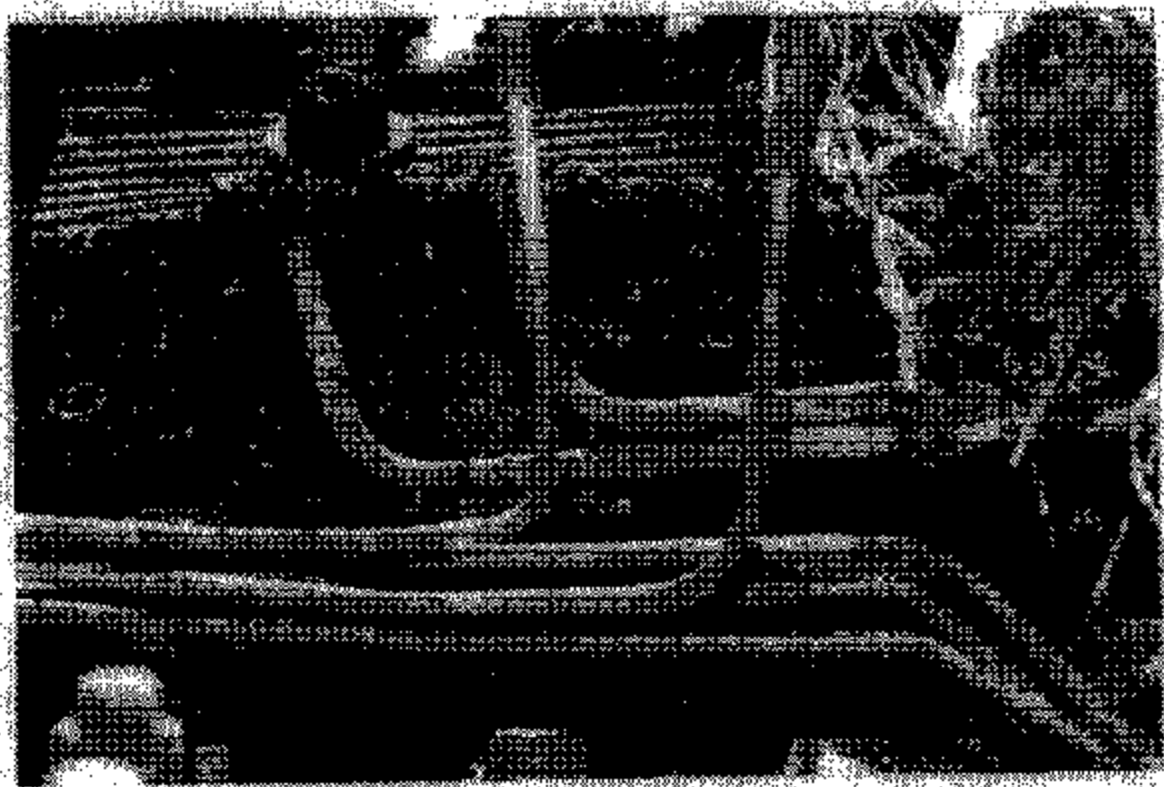


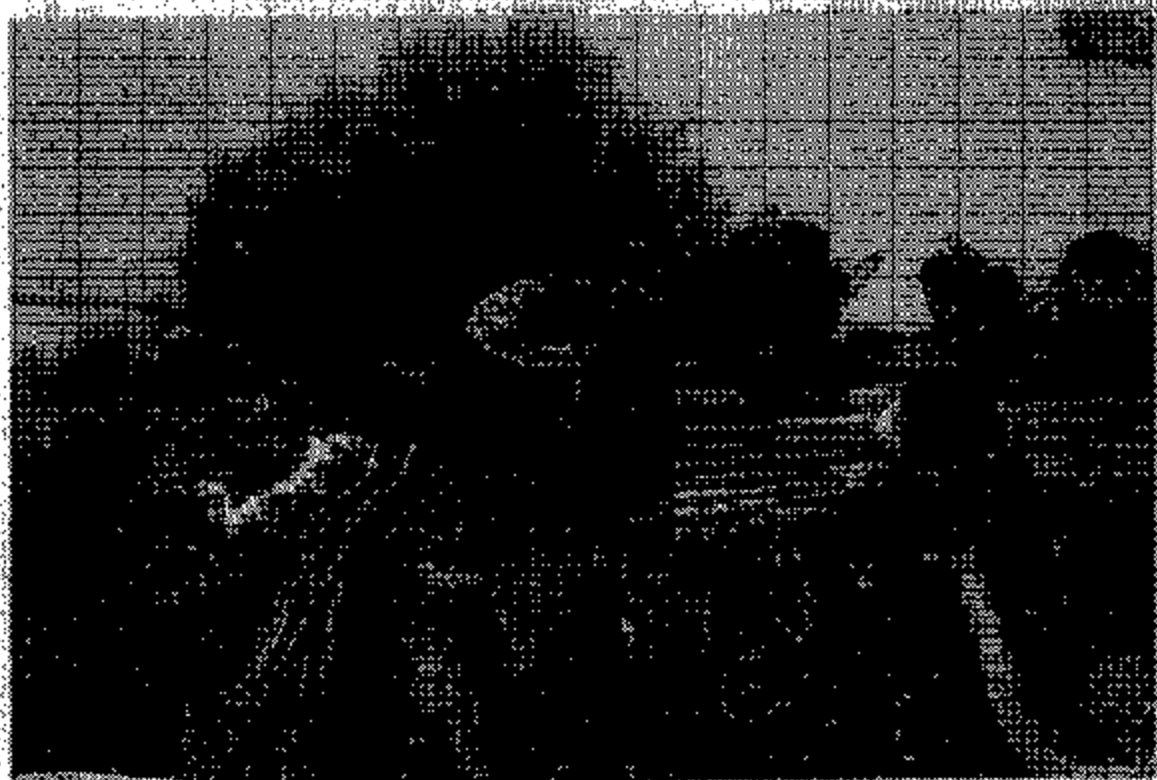




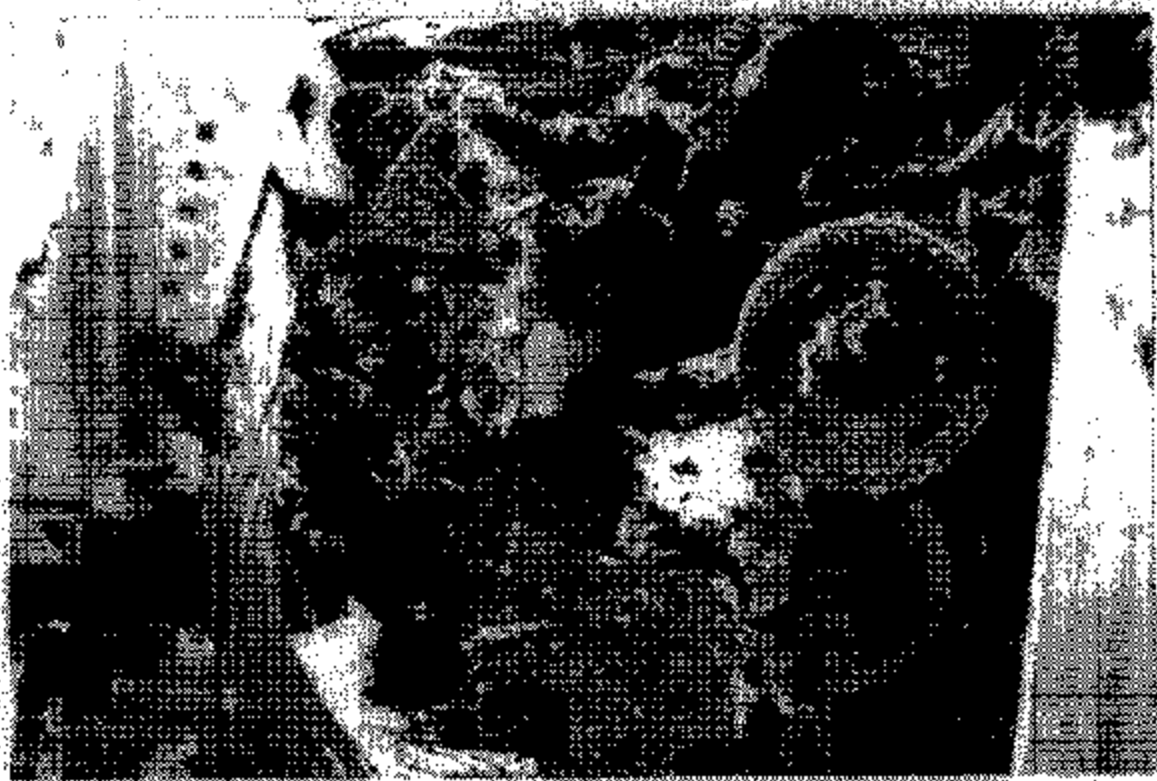


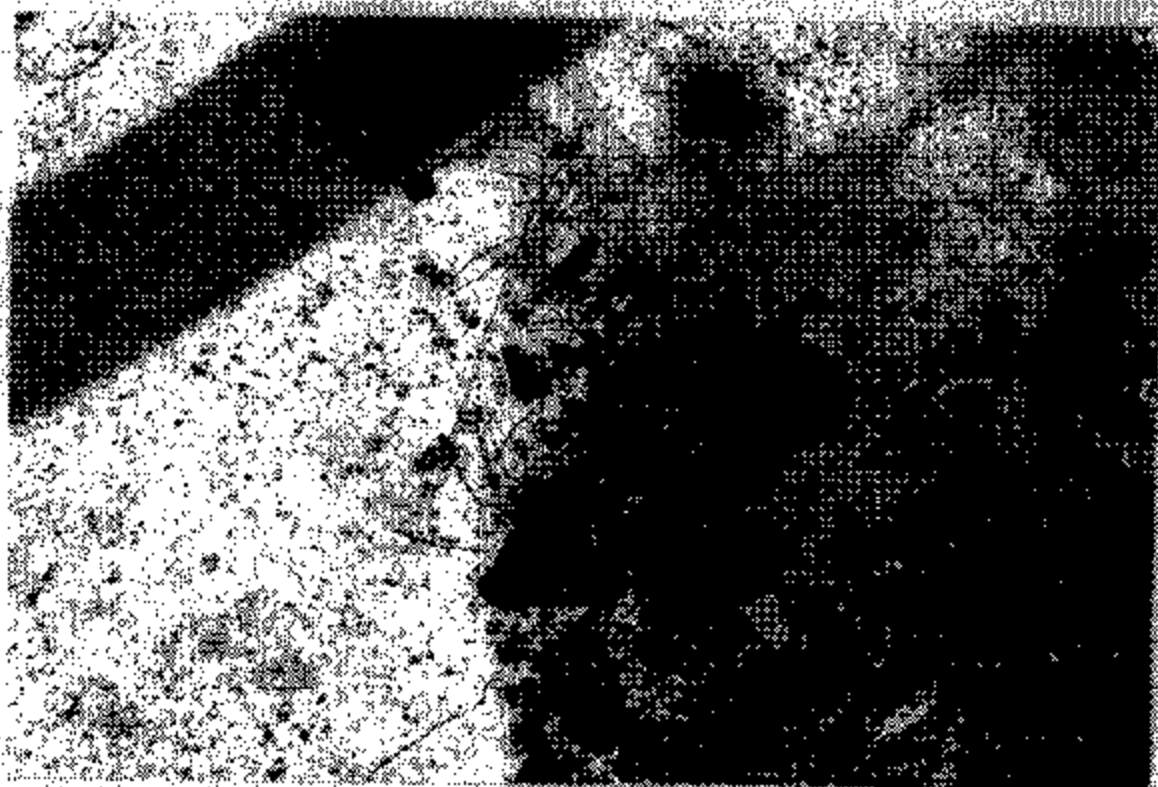


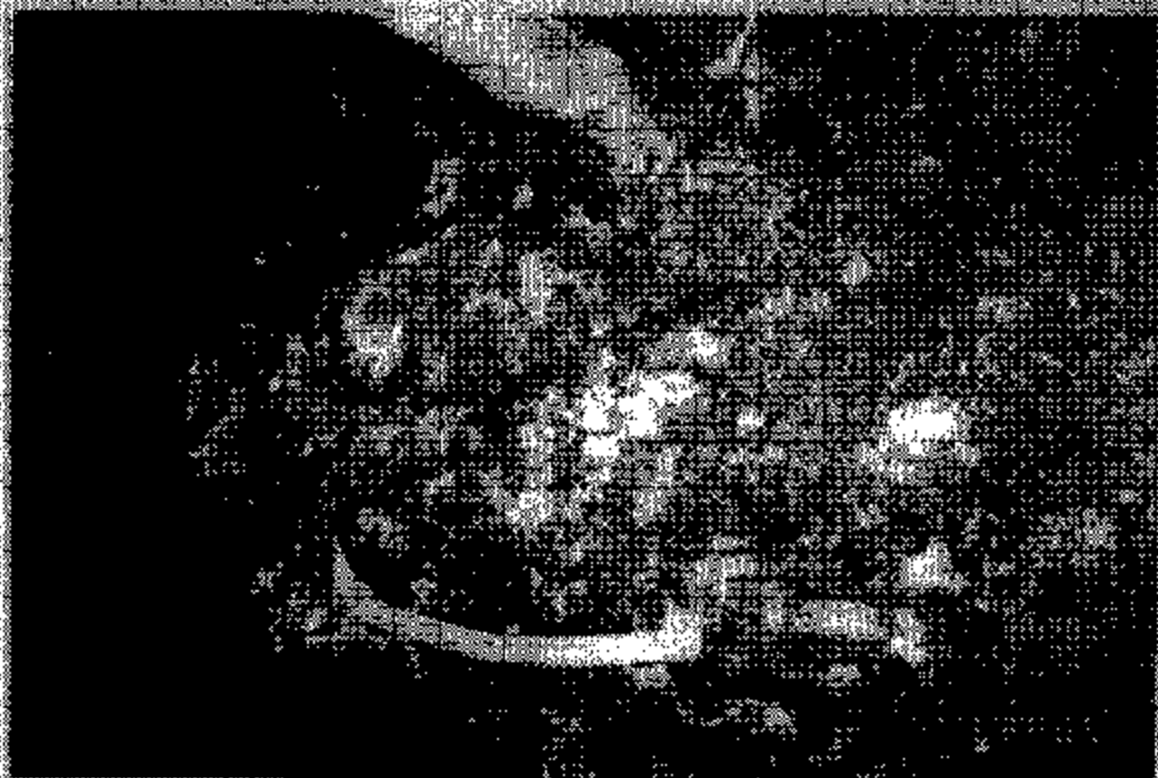


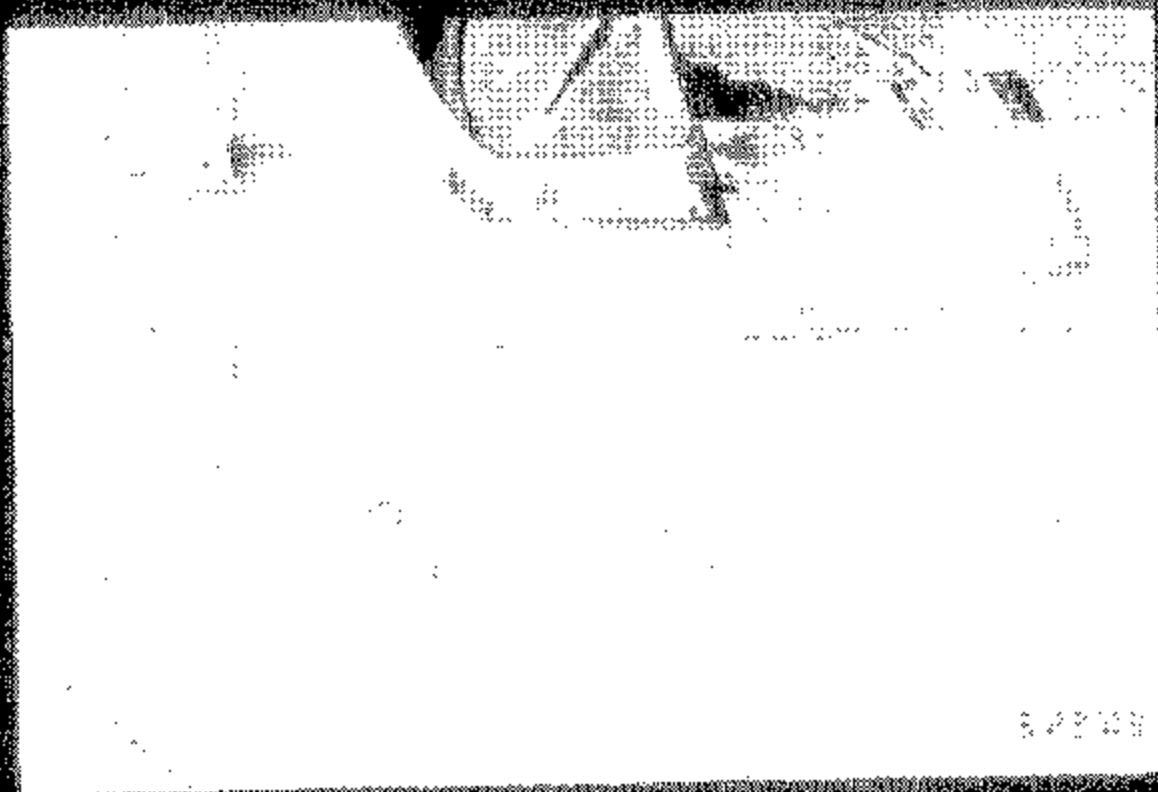








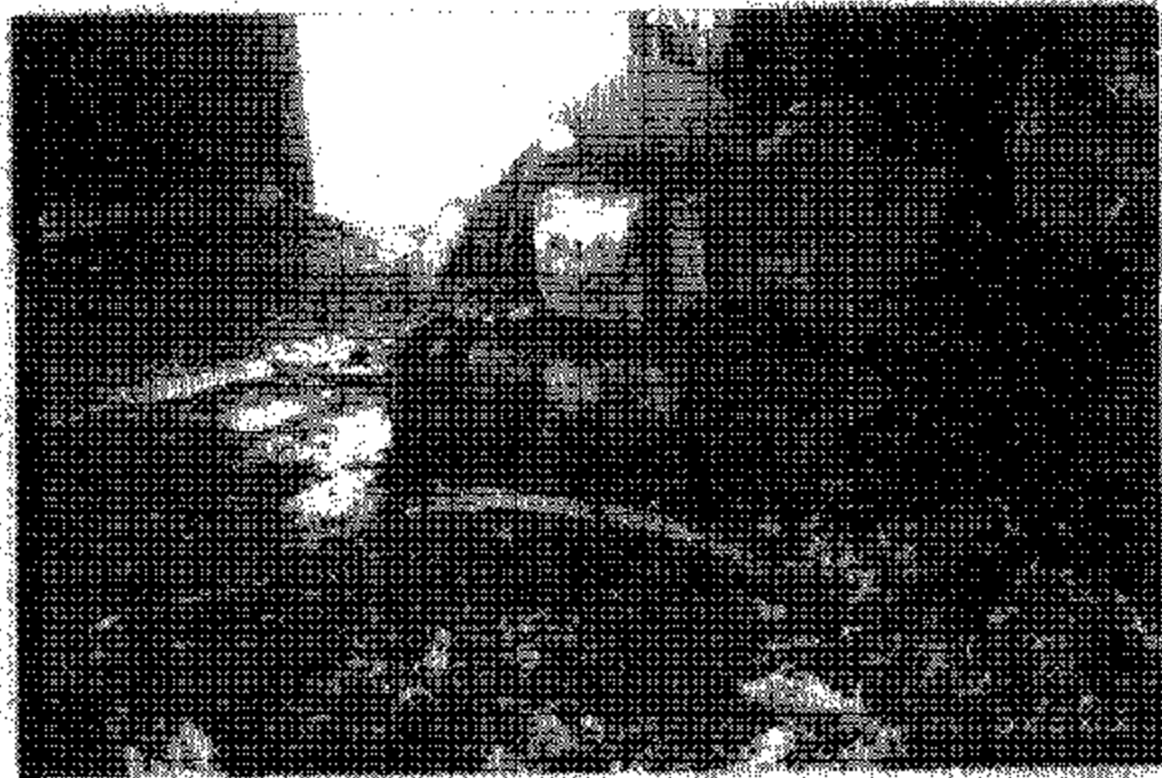




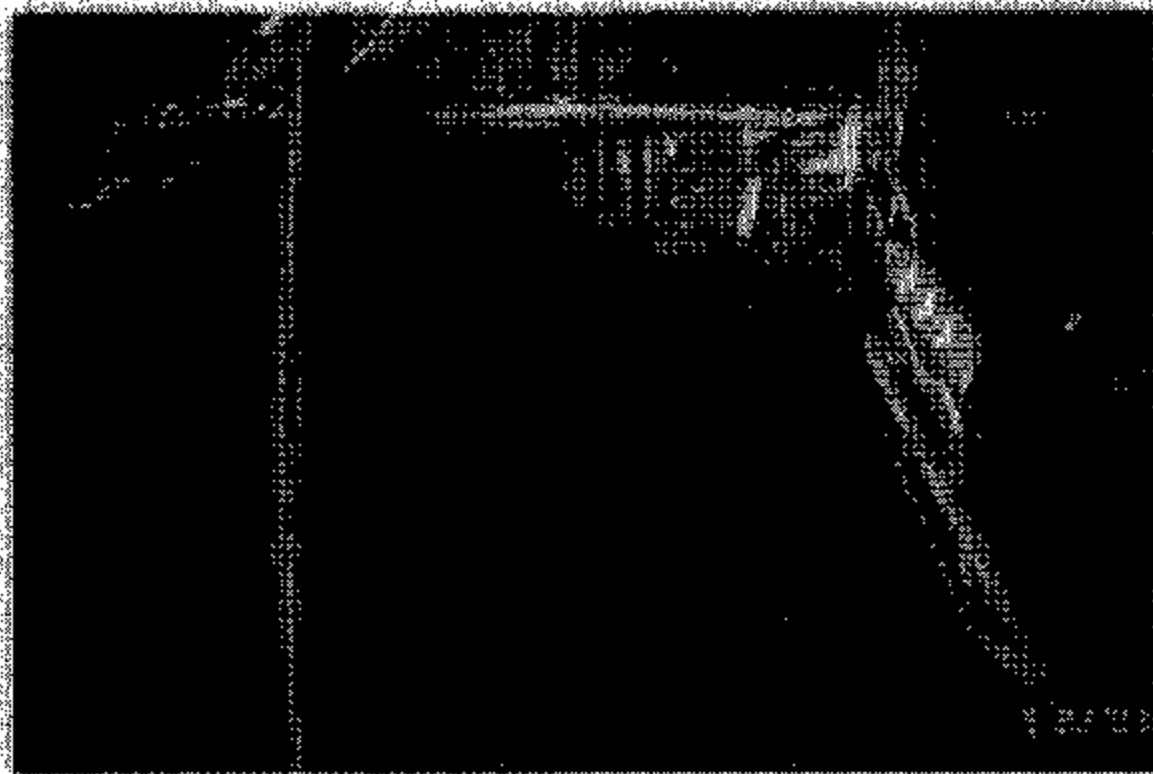
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2002-025 13036



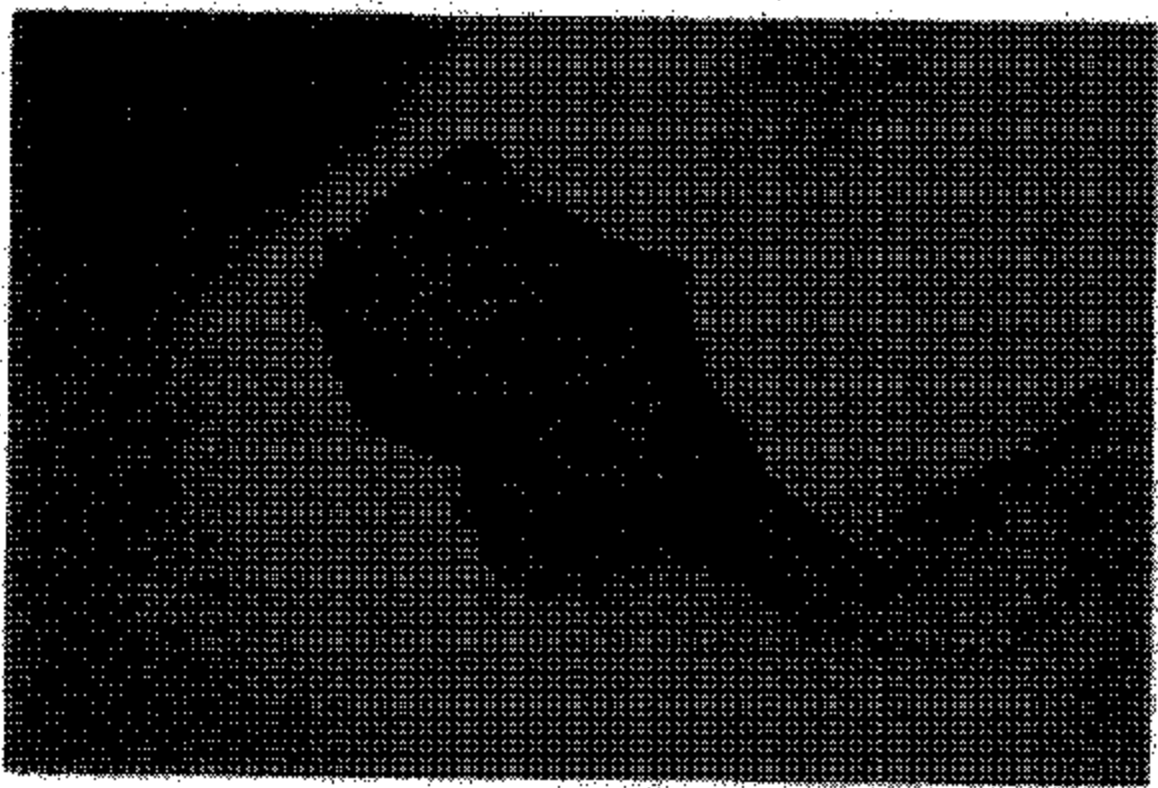
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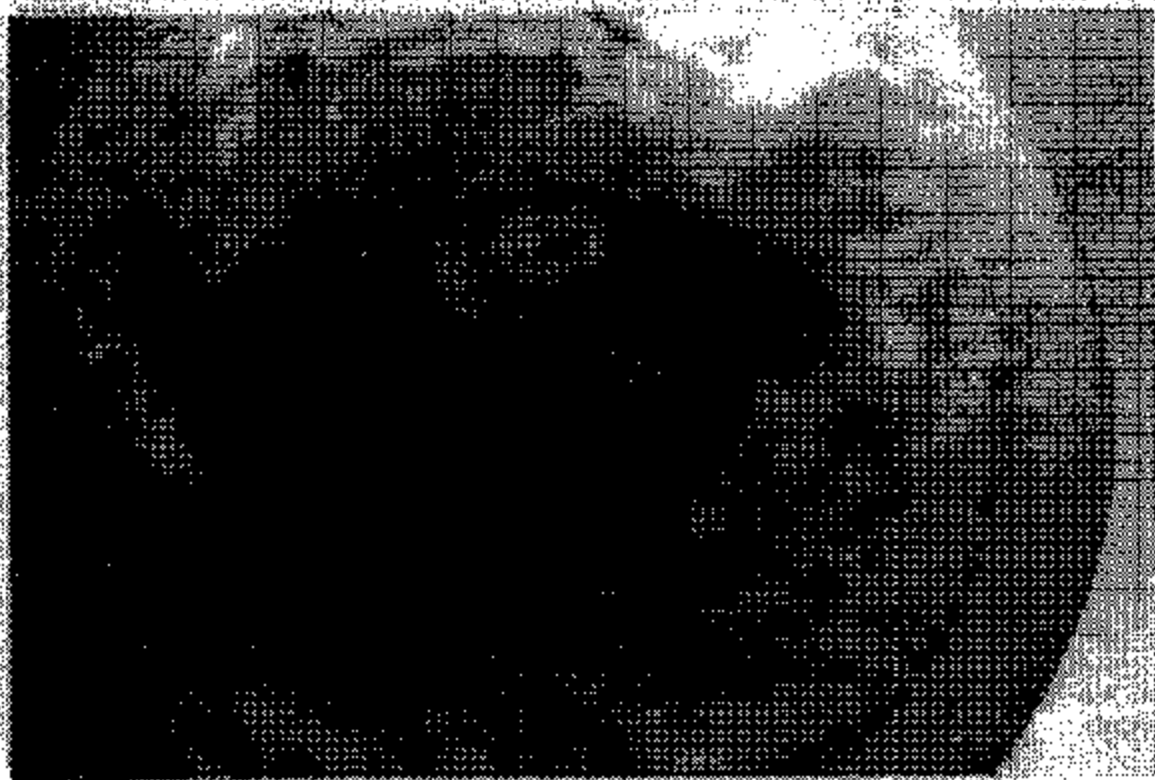


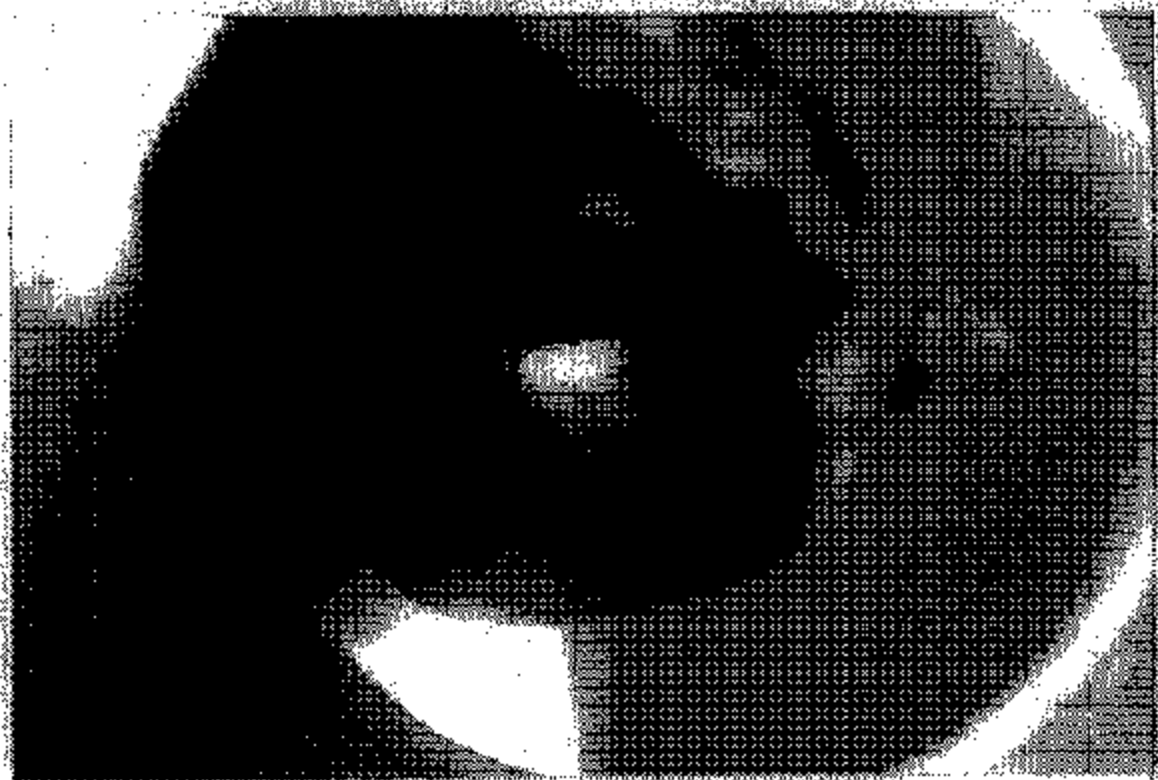


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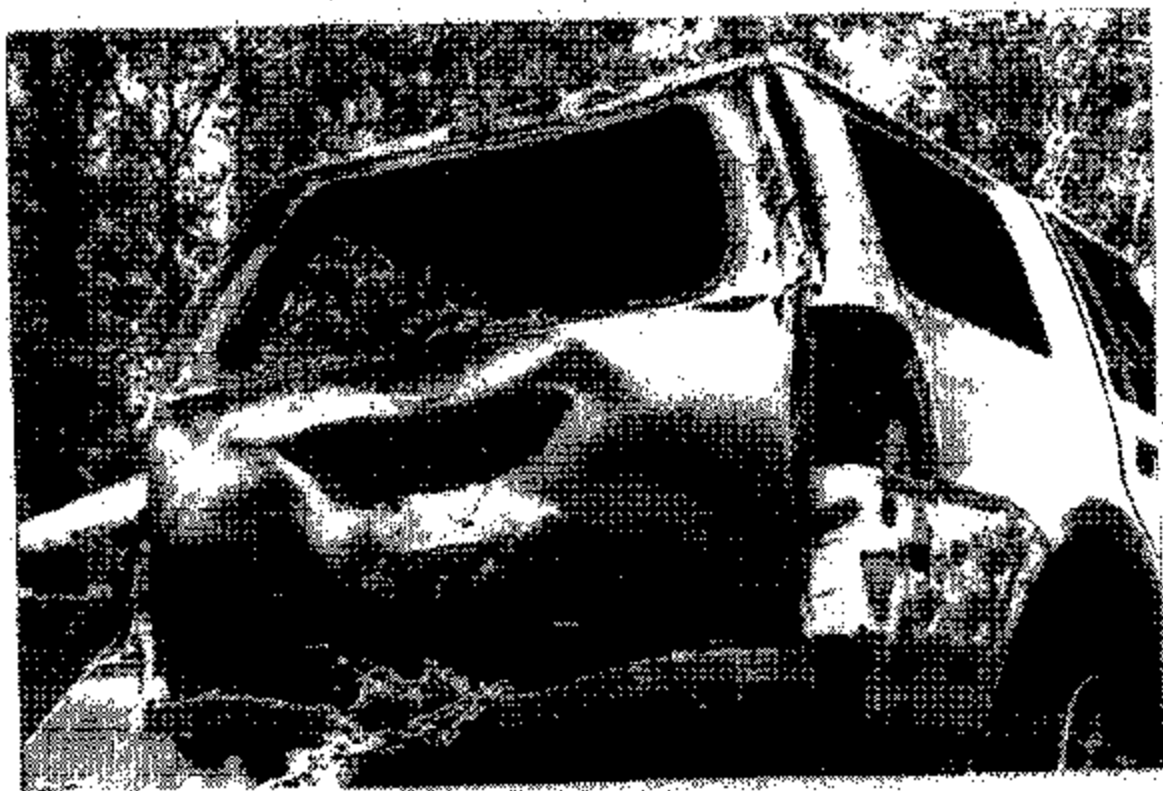
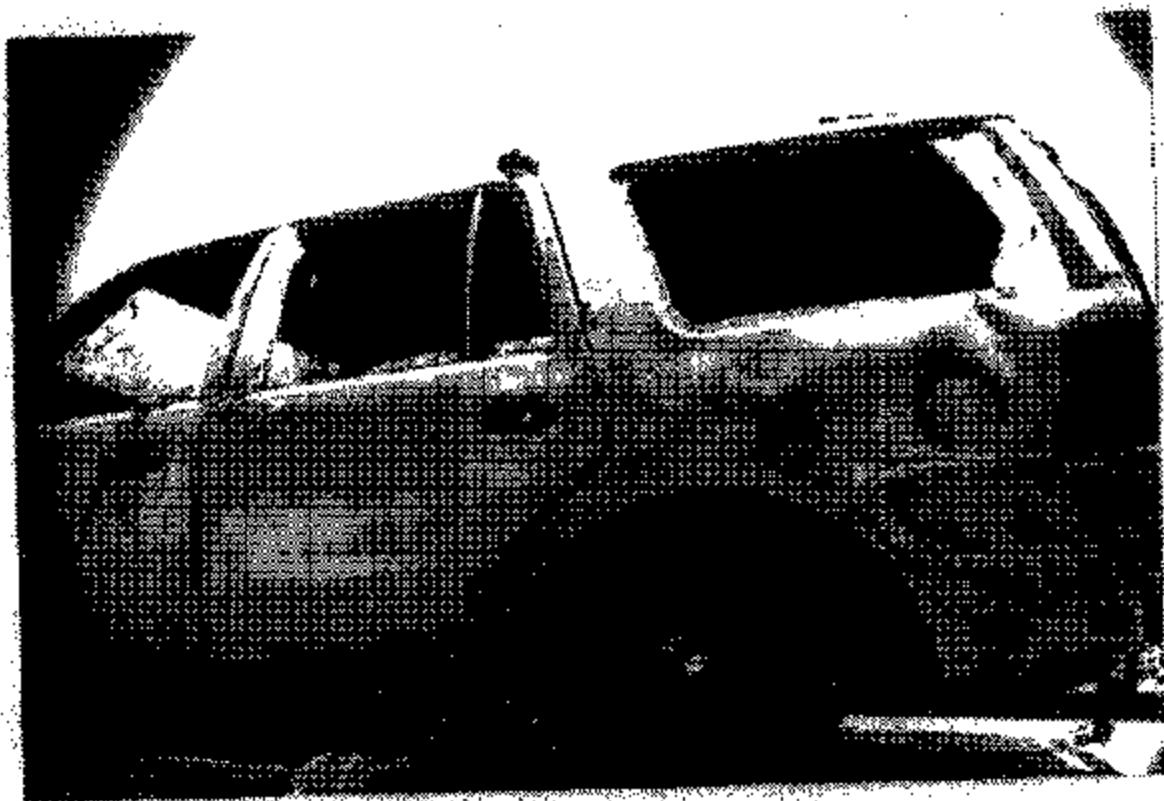






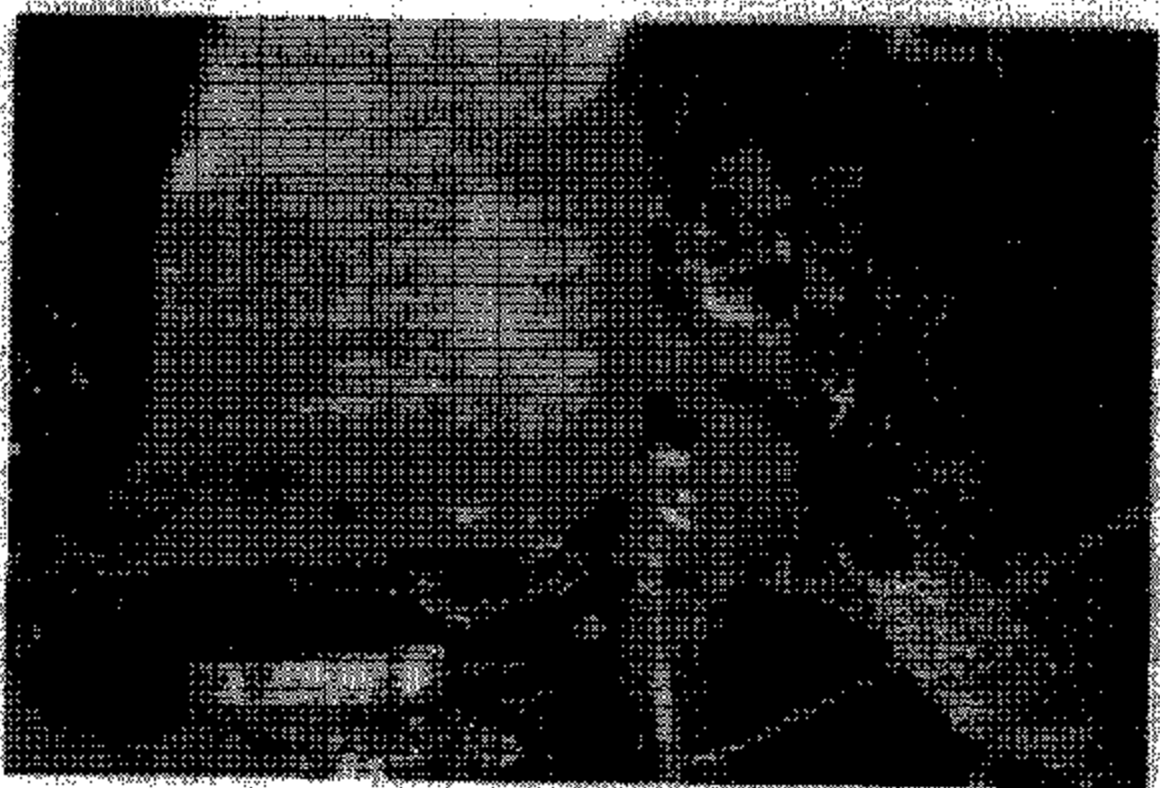


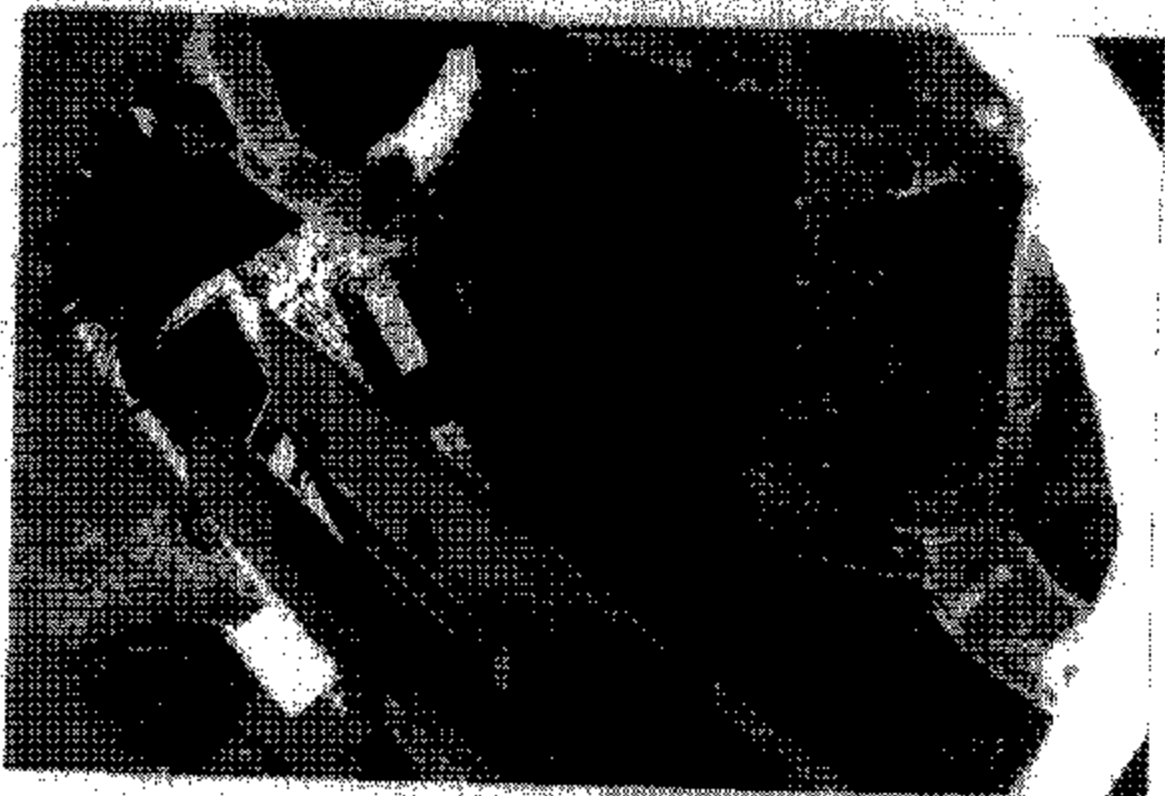
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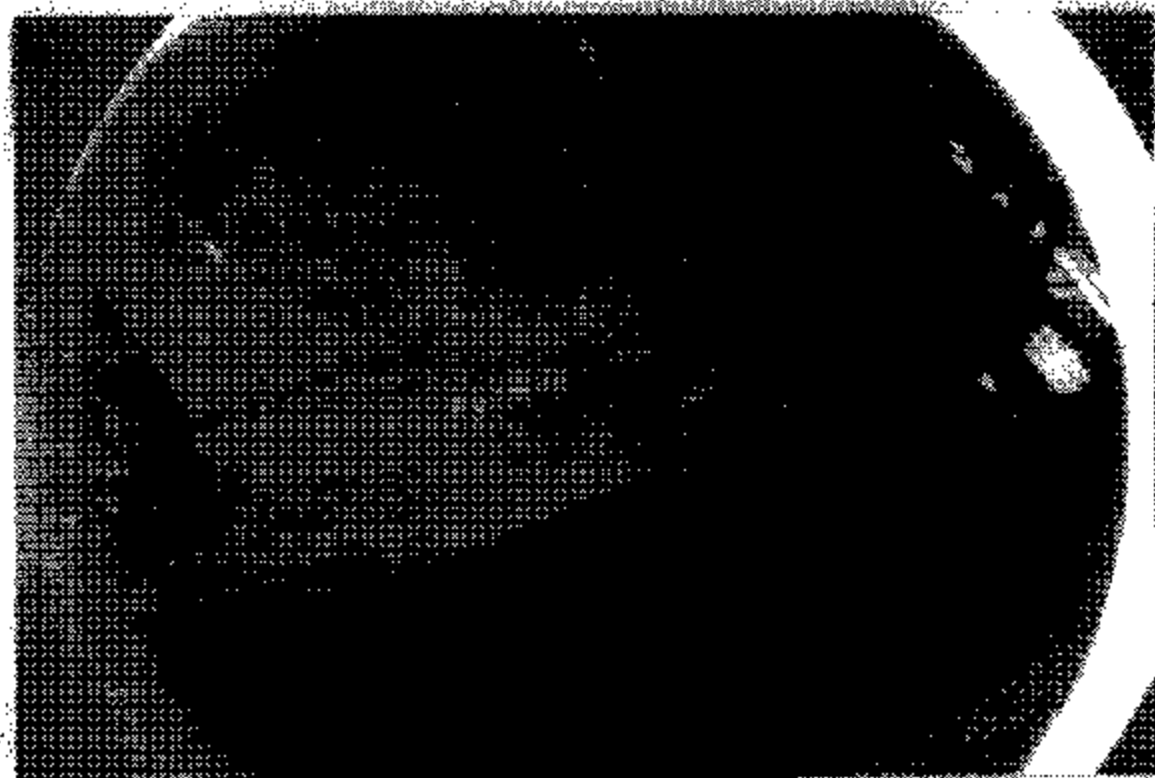
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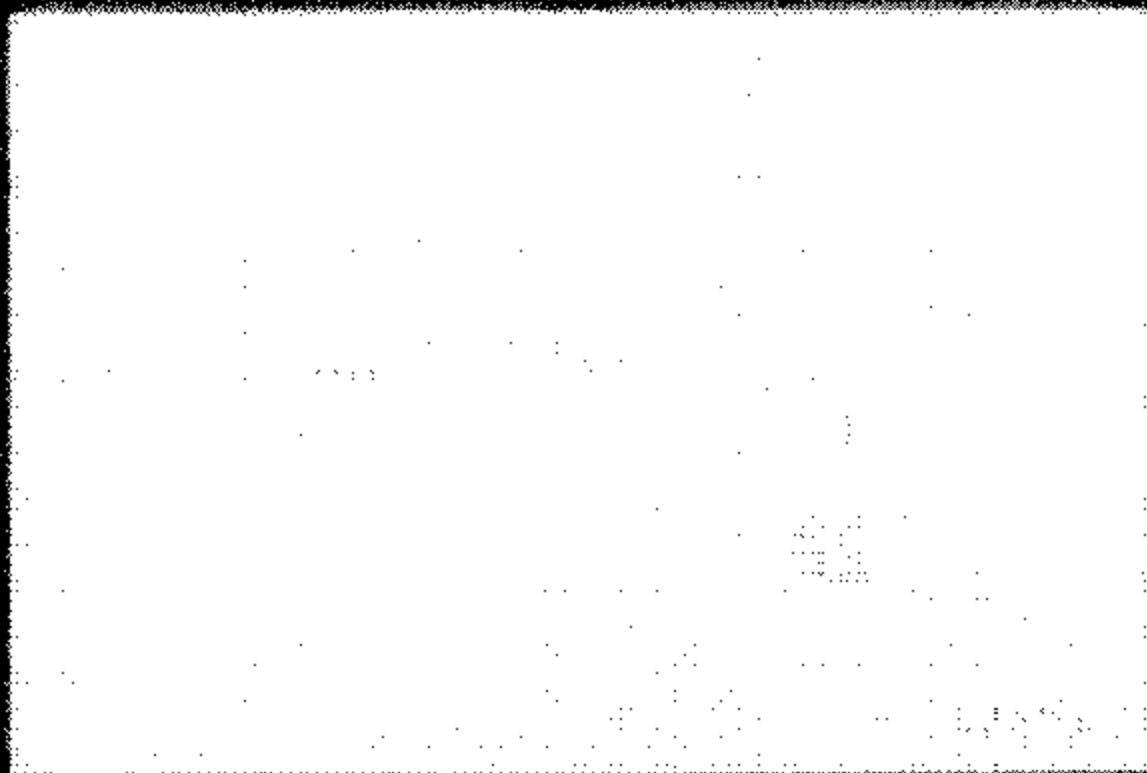
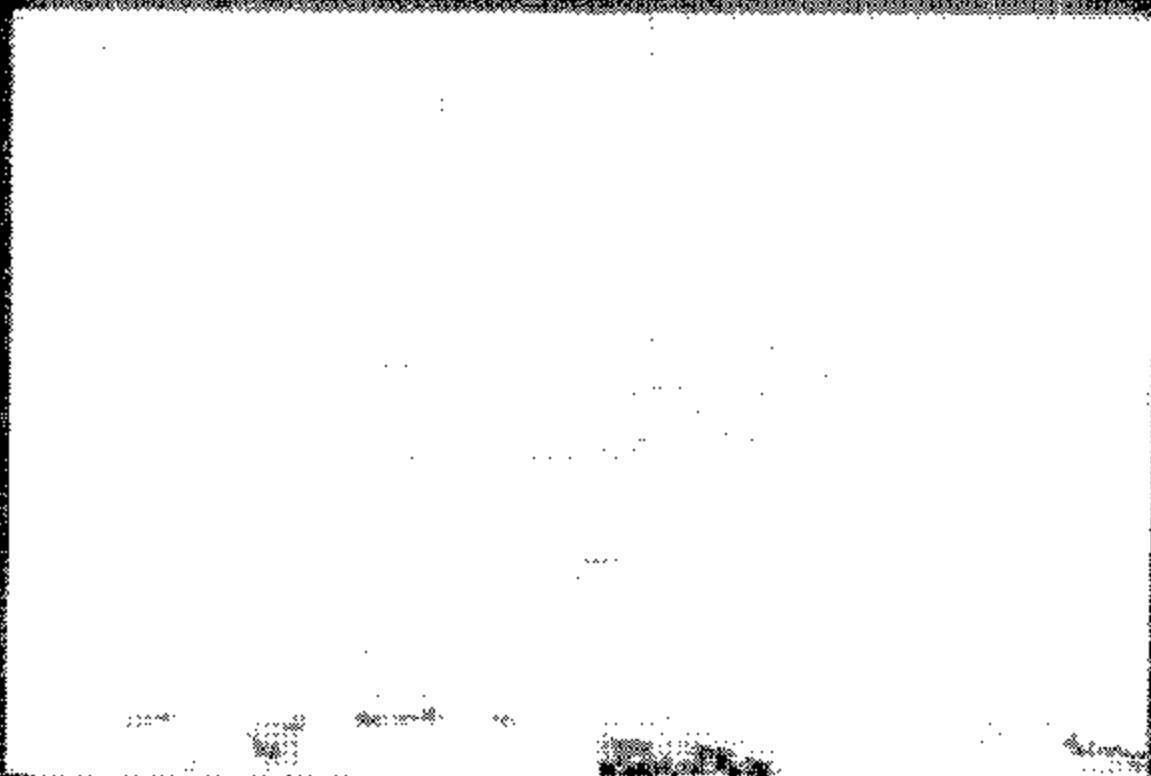


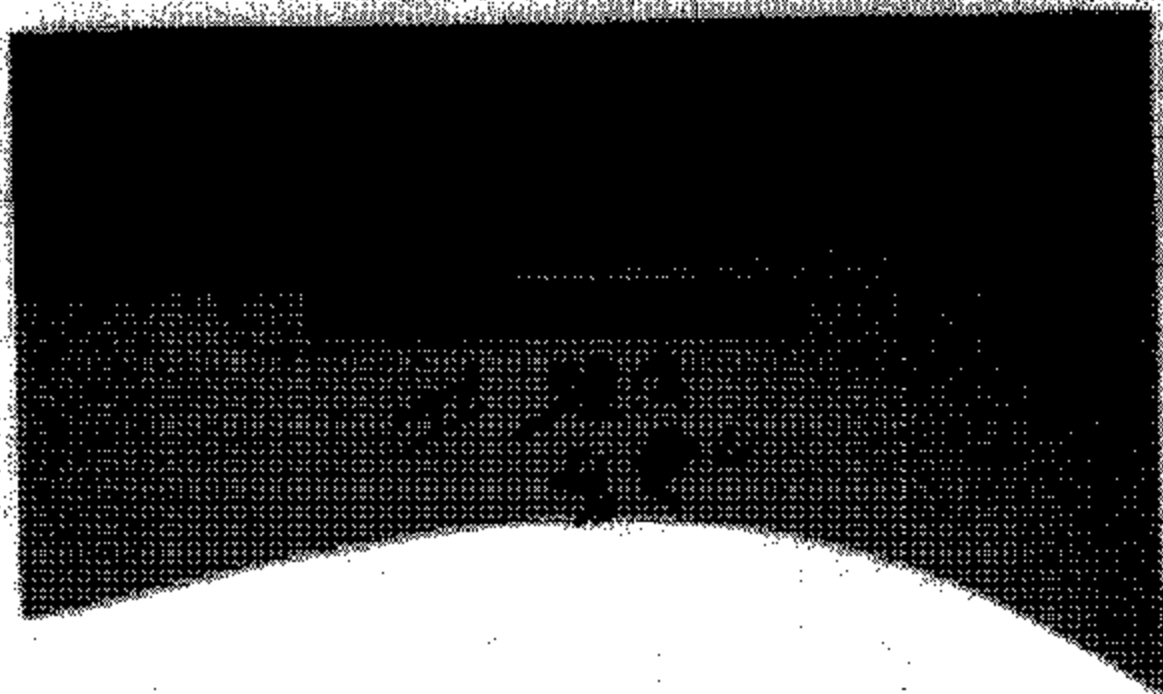
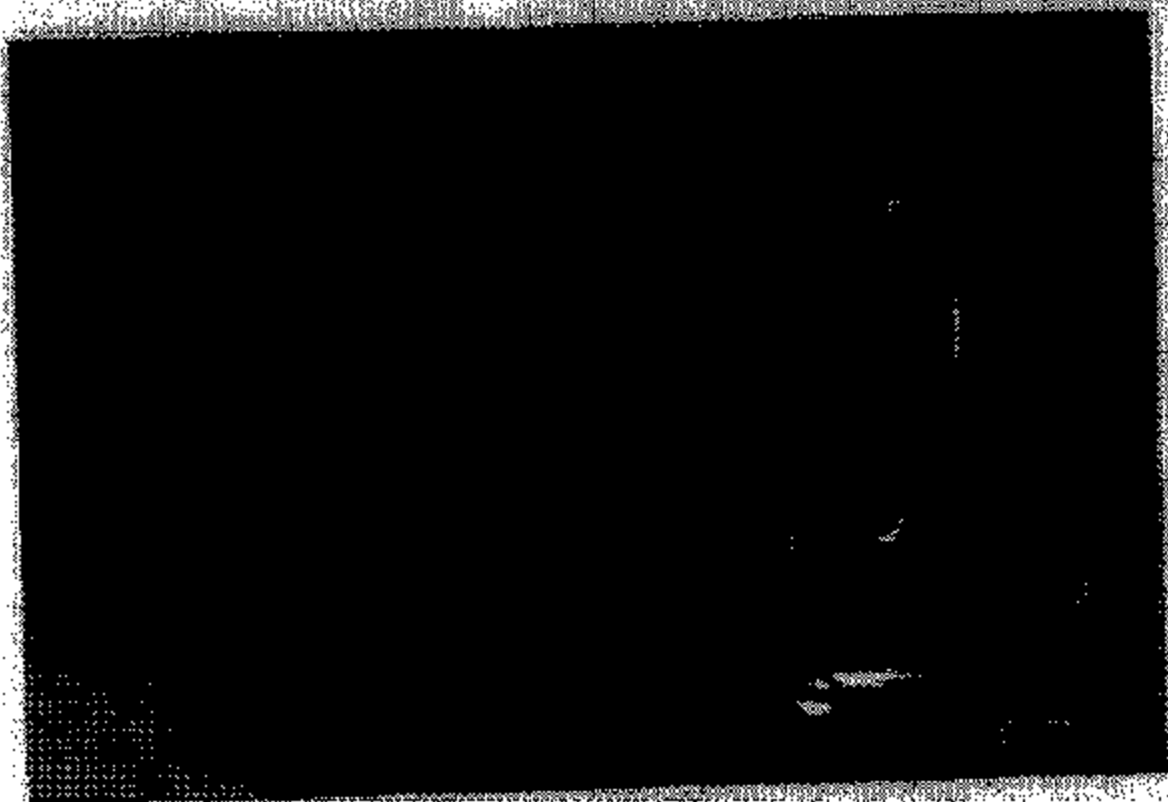


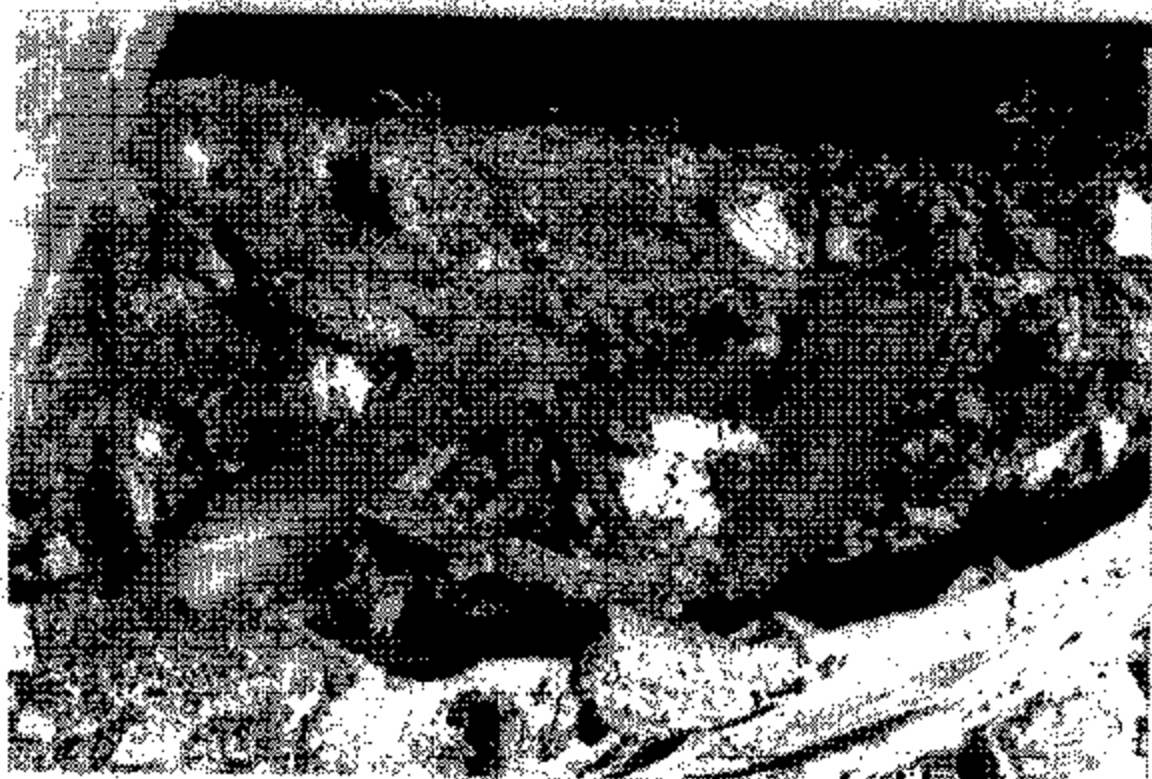






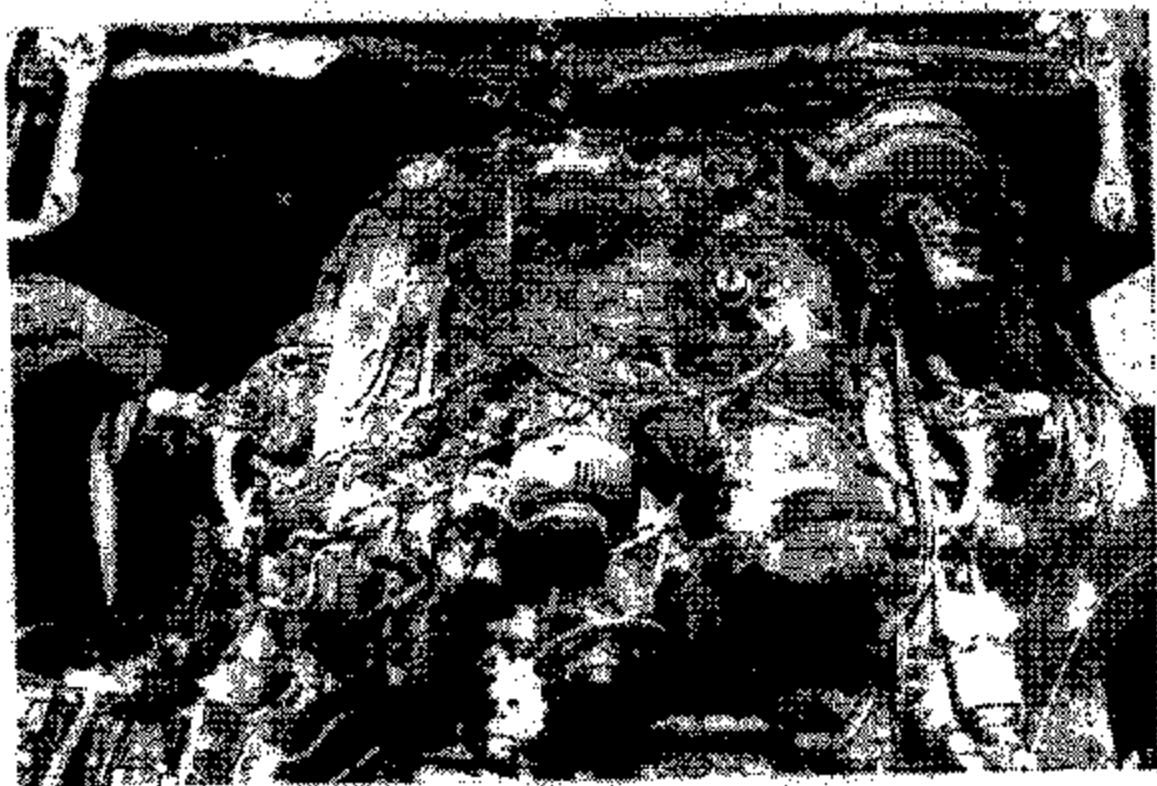










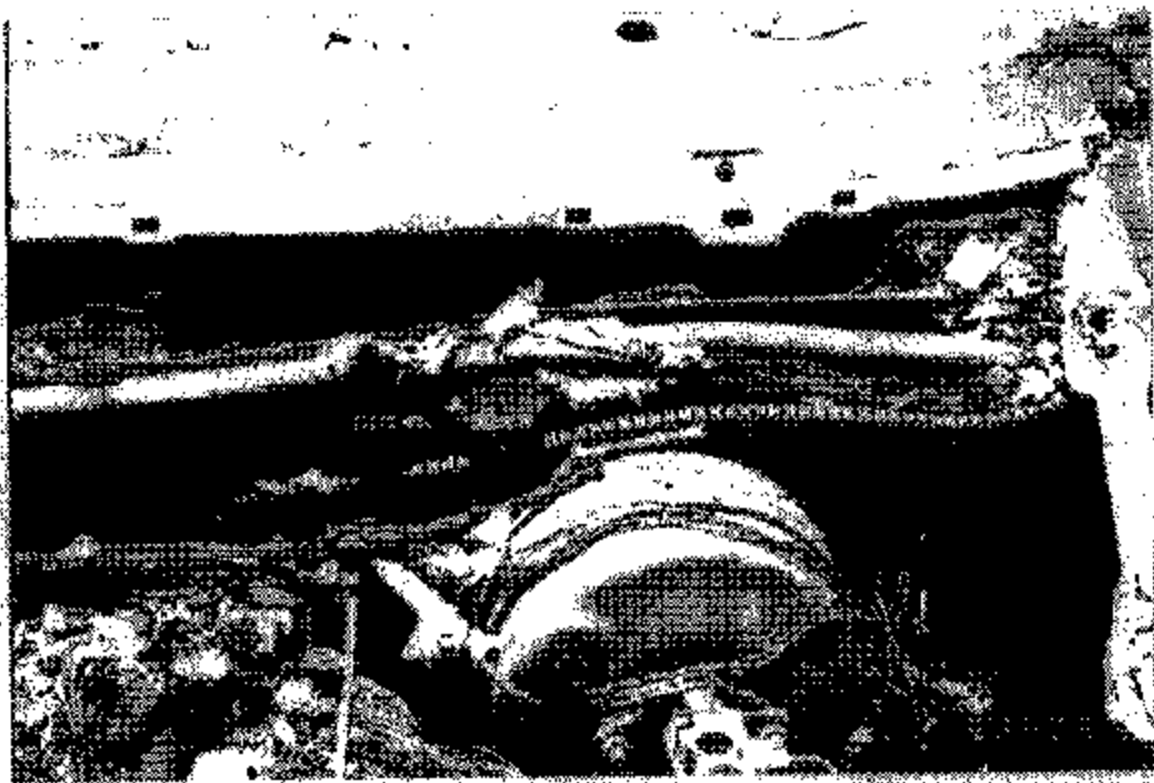




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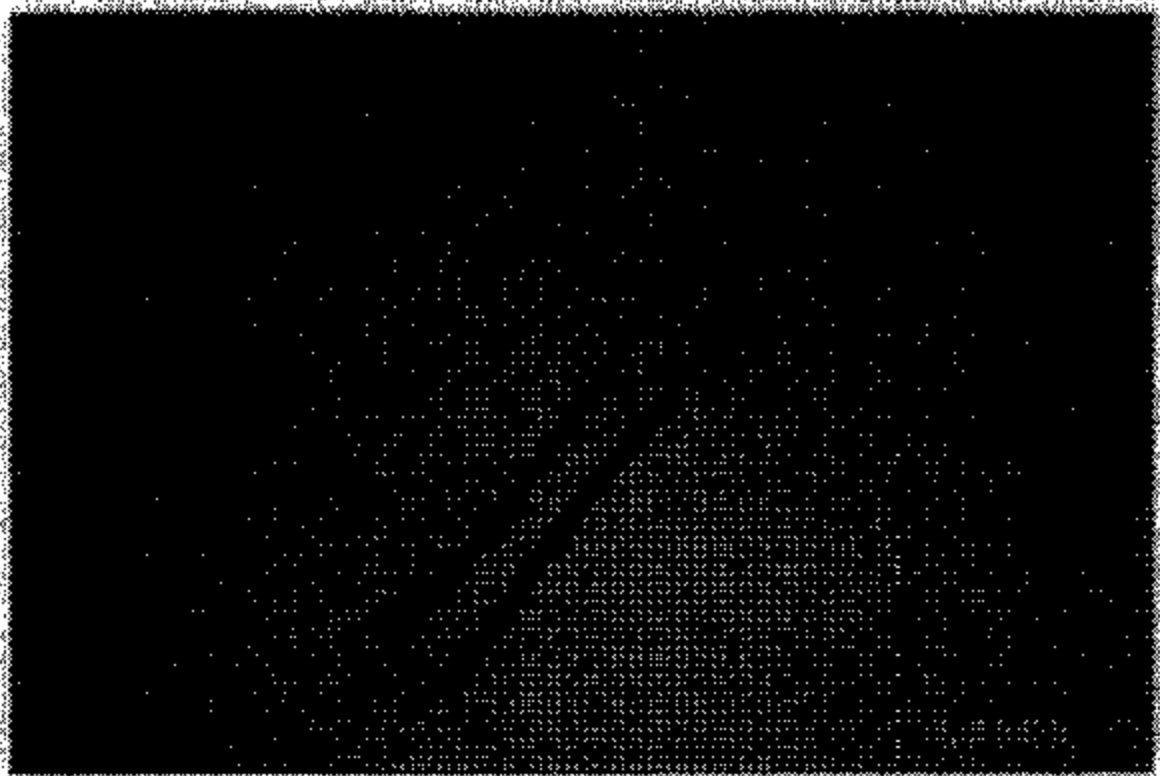
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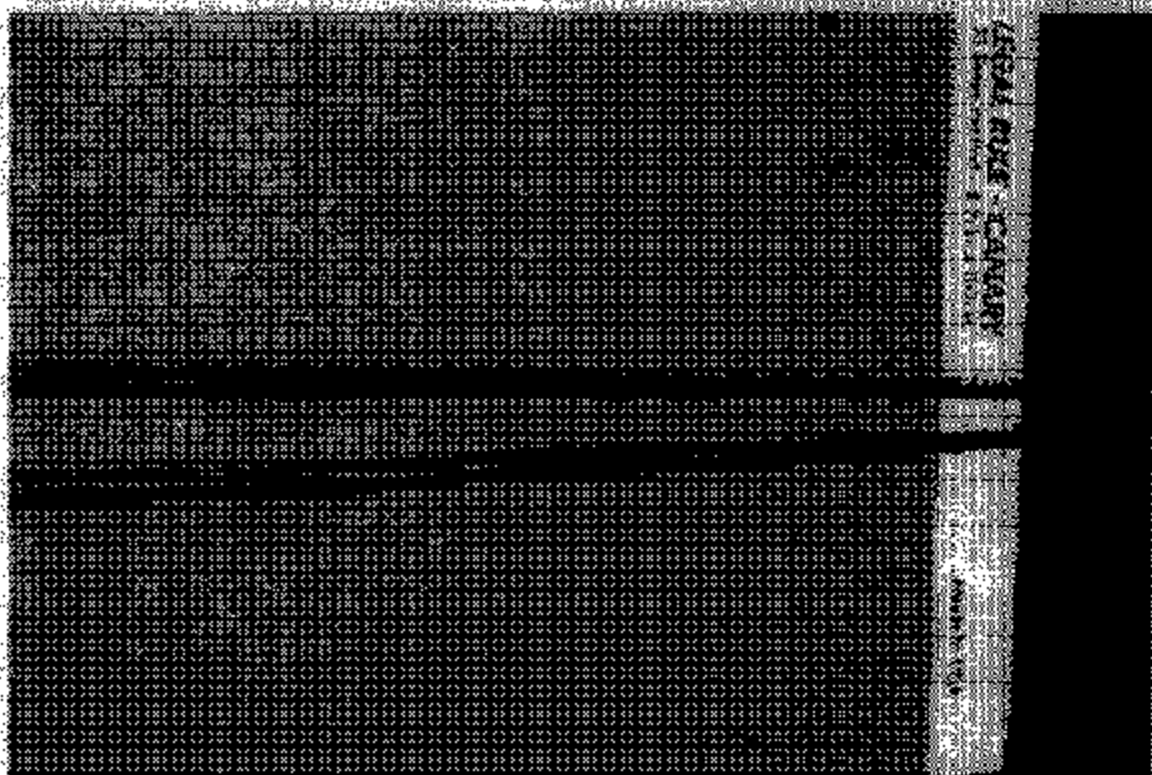


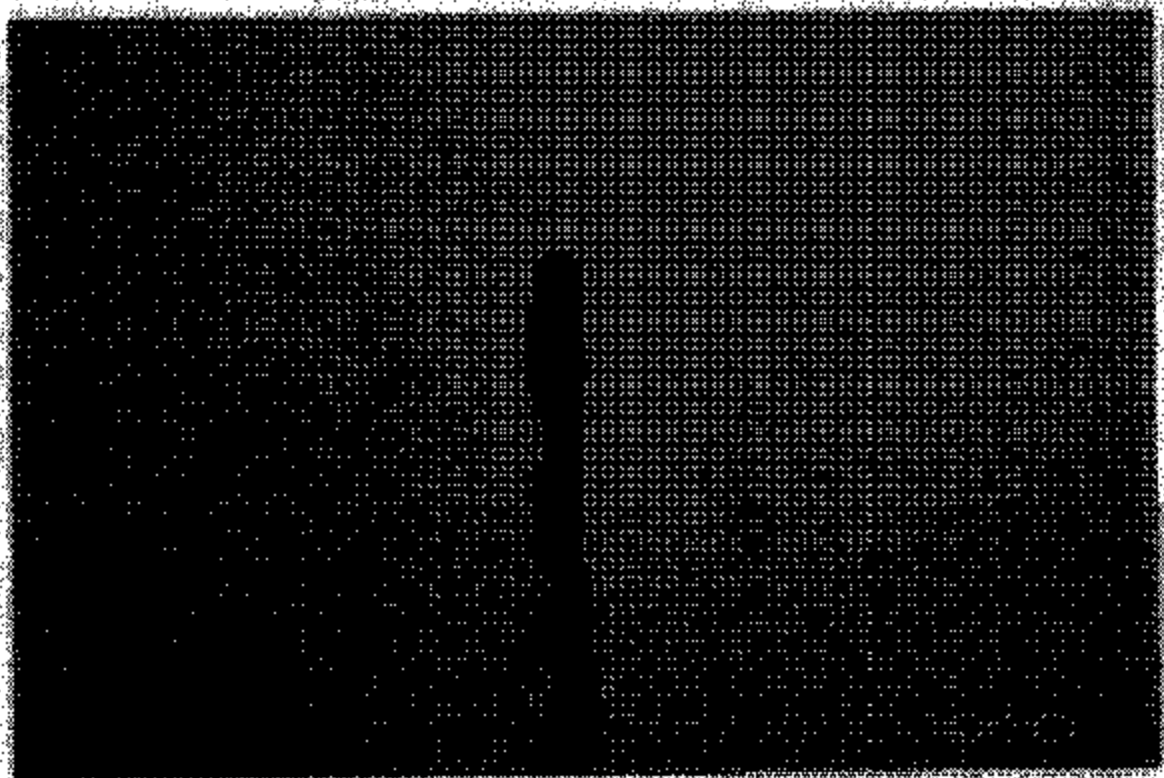
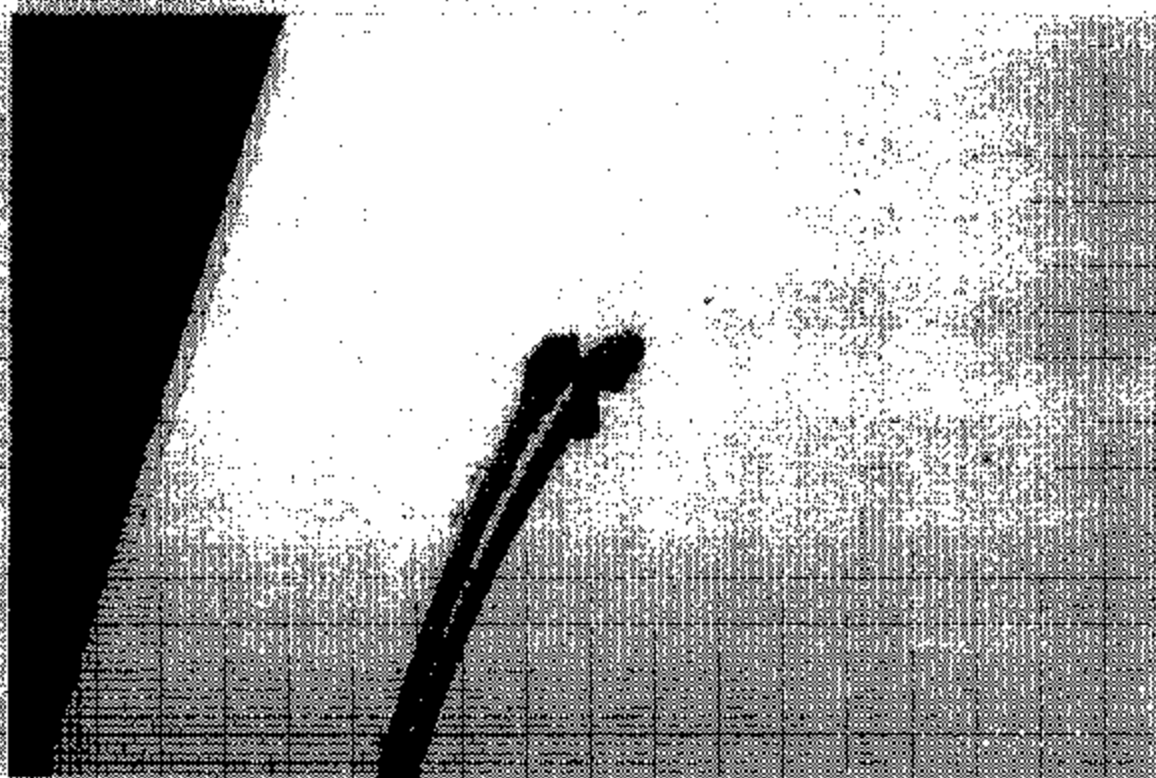
EP02-025 10959











OASIS RESULT:
1LNLM82W8RY68527705/02/2003
09:02:00

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▶ VEHICLE INFORMATION**VEHICLE DESCRIPTION**
1994 TOWN CAR**BODY STYLE**
4 DR SEDAN SIGNATURE**ENGINE**
4.6L SOHC
(ROMEO)**ENGINE
CALIBRATION**
418JR00A**TRANSMISSION**
4 SPD OD AODE**AXLE CODE**
JY**▶ GENERAL WARRANTY INFORMATION****WARRANTY START DATE**
01/10/1994**BUILD DATE**
12/21/1993**SALE MILEAGE****▶ WARNING MESSAGES**

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

▶ FIELD SERVICE ACTIONS

NO CAMPAIGN MESSAGE(S) FOUND

▶ EXTENDED COVERAGES

NO ESP INFORMATION AVAILABLE

▶ REPAIR HISTORY

NO REPAIR HISTORY ON VEHICLE

END OF OASIS REPORT FOR 1LNLM82W8RY685277

E982-825 19945

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

VIN:	1LNLMZTWRY082277	Veh Line:	C/VE -	Body Shell:	
Model Year:	1994	Market Design:	C/M - L-M DIVISION DERIVATIVE	Navis Eng Serial No:	
Veh Type:	C	Drive Code:	C/E - 2 WHL L/H REAR DRIVE	Engine:	C/VN - R-M 4.6L SOHC IE
Inv. Dealer:	12009	Body Cab Style:	- 4 DOOR SEDAN-6 LITE	Transmission:	C/DK - 4 SPD AUTO TRAI
Vehicle Status Code:	SDC	Version/Option:	C/HR - SIGNATURE VERSION		
Trace Eng Serial No:	1-----2-----3-----4-----5-----6-----7-----8				

NA

Trace Trace Serial No:

NA

BUILD INFORMATION:

Region:	NA - 000000000	Plant:	BA - WINDOM PLANT BUILD
Country:	USA - 000000000	Prod Date:	21-DEC-1993

SALE INFORMATION:

Region: NA - 000000000 Selling Dealer: 323600 - *

Country: USA - 000000000 Selling Div: 267Prov: LA

Buyer Div: LA

Arrival Date: 04-JAN-1994 Red Carpet Lease: I

Sale Date: 10-JAN-1994 Fleet/Lease/CCA: Lease: R

Warranty Start Date: 10-JAN-1994 Modified Vehicle: * Vehicle Credit Flag:

Orig Warranty Date: 10-JAN-1994 Recaptured Vehicle: * Vehicle Export Flag: N

VOC/EOC:

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

M222V88277 B 3 A 2 202196 NK T RY 3266 W3 L6 SA 78 228600 4 UA DK 2 S W1

LDM S D 8 755A SHF

A

ER02-025 10000

INSTALLED OPTION INFORMATION:

Air Conditioning:	CC - A/C AIR CONDITIONER	GVW Code:	
Alternator Amp Rating:	*	GVW Class Code:	L
Audio Blk:	AC - ALIBI DISC CHANGER PLAYER	Instrumentation:	* - [N/A]
Axis Ratio:	BGACC - 3.08 FINAL DRIVE RATIO	Mirror(Driver Side):	* - [N/A]
Axis Type:	BOMAB - NON-LIMITED SLIP REAR AXLE	Mirror(Passg Side):	* - [N/A]
Battery Amp Rating:	72	Paint:	PMUAA - EBONY SOLID CC
Brake Code:	* - [N/A]	Power Windows:	* - [N/A]
Brake Code(Service):	* - [N/A]	Radios:	AQ - BLUET PREMIUM AM/FM STEREO
Calibration Code:	418J00A	Sound System:	* - [N/A]
Color(Accent):	* - [N/A]	Steep Tension Axle:	
Color(Trim):	* - [N/A]	Tire Manufacturer:	AJ -
Delivery Type:	R	Tire Brand:	*
Drivetrain Code:	*	Tire Size:	DSGSE - P215/70R15 WSW
Front Seat:	CX - SEAT-SPLIT BENCH	Traction Control:	AB - ANTI-SPIN TRACT BRAKES W/O JVD
Fuel Type:	* - [N/A]	Wheel Base:	

TIRE DOT INFORMATION:

LF: * RF: *

LR: * RR: *

LL: * RL: *

SPARE: * DOT Plant Manufacturer: * - *

ESP INFORMATION: EMISSIONS INFORMATION:

ESP Code:	* Emission Code:	C/B - C/B
ESP Coverage(Miles):	* Emission Cert Type:	F
ESP Coverage(Thurs):	* Emission Decal Suffix:	KEL
ESP File Year:	* Engine Family:	RFM46VEGAEA
ESP Signature Date:		

Any comments?

8002-825-1887

ANALYTICAL WARRANTY SYSTEM

Standard Claims List For Model Year 1994

Note: All Costs are in US Dollars

VIN	VEH LINE	MKT DEITY	BODY CAR	VER SERIES	DRIVE TYPE	FLT CD	TRN CD	ENG CD	PROD DATE	WARR DATE	SELLING DEALER	SELL CNT	TRN	WCC	CPSC_6	PRF	RASE	SUFF	CCC	CD	DEST (Miles)
1LNLM82W8RY685277	C/VB	CM	CFC	CER	CB	BA	CDK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	5	SR10	110402	FIAZ	7210	A	B43	01	6892
AWS Claim Key:		1784382	Trx Code:		2	Labor Hrs:		4	Labor Cost:		19.22	Material Cost:		36.39	Total Cost:		55.61				
Dr: Cd-Sub Cd:		06584-*	Name:				LAMARQUE NORTH SHORE FORD, INC				Ph:	985-6249800	St LA	City Cd:		USA	Reg Cd:		NA	Rpt Date:06-JUN-1994 Doc #-048476	
1LNLM82W8RY685277	C/VB	CM	CFC	CER	CB	BA	CDK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	5	7Q05	190401	FIAZ	19A390	A	A85	01	6927
AWS Claim Key:		1784382	Trx Code:		2	Labor Hrs:		3	Labor Cost:		14.62	Material Cost:		30.87	Total Cost:		65.09				
Dr: Cd-Sub Cd:		06584-*	Name:				LAMARQUE NORTH SHORE FORD, INC				Ph:	985-6249800	St LA	City Cd:		USA	Reg Cd:		NA	Rpt Date:06-JUN-1994 Doc #-048545	
Tech Comments:		M- REPL ANTENNA FOR CAR PHONE AND MAST																			
1LNLM82W8RY685277	C/VB	CM	CFC	CER	CB	BA	CDK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	13	5Y04	NANANA *	CAMPGN *		A99	02	18361	
AWS Claim Key:		7236931	Trx Code:		94839	Labor Hrs:		1.5	Labor Cost:		72.09	Material Cost:		1.57	Total Cost:		73.66				
Dr: Cd-Sub Cd:		06584-*	Name:				LAMARQUE NORTH SHORE FORD, INC				Ph:	985-6249800	St LA	City Cd:		USA	Reg Cd:		NA	Rpt Date:30-JAN-1995 Doc #-053294	
1LNLM82W8RY685277	C/VB	CM	CFC	CER	CB	BA	CDK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	13	7W07	1311XX	P4LY	19A438	C	A99	08	18591
AWS Claim Key:		7236932	Trx Code:		94838	Labor Hrs:		6	Labor Cost:		28.84	Material Cost:		10.5	Total Cost:		39.34				
Dr: Cd-Sub Cd:		06584-*	Name:				LAMARQUE NORTH SHORE FORD, INC				Ph:	985-6249800	St LA	City Cd:		USA	Reg Cd:		NA	Rpt Date:30-JAN-1995 Doc #-053295	
1LNLM82W8RY685277	C/VB	CM	CFC	CER	CB	BA	CDK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	13	5B01	060402	FIVY	2L265	A	B02	01	18688
AWS Claim Key:		7236933	Trx Code:		884	Labor Hrs:		1.9	Labor Cost:		187.44	Material Cost:		35.39	Total Cost:		243.03				

EM82-825 18868

https://web.awssupp.ford.com/cgi-bin/jlu/clmlist20.cgi?srvc=cccdh2x&modelyr=1994&vin_cd=1LNLM82W8RY685277

5/2/2003

Dir Cl-Sub Cl:	05322-*	Name:	LAMARQUE NORTH SHORE FORD, INC.	Pl:	985-0249000	St:	LA	City:	Ch:	USA	Reg:	Ch:	NA	Repr:	Date:	Doc:
Task Comments:	REPL & R ECTORS RING AND REPAIR BENT PARTS															
ILNLM82WERY685277 C/VB	CM	CPC	CER	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	18	2829	030801	F2AZ	97715 A N11 46 23164
AWS Claim Key:	10037584	Trx Code:	807	Labour Hrs:	1.3	Labour Cost:	53.82	Material Cost:	44.33	Total Cost:	203.88					
Dir Cl-Sub Cl:	05332-*	Name:	GRUBBS FORD, LINCOLN- MERCURY, INC.	Pl:	985-7353673	St:	LA	City:	Ch:	USA	Reg:	Ch:	NA	Repr:	Date:	Doc:
Task Comments:	CHECK NOISE UNDER HOOD															
Task Comments:	RUN EEC TEST REPLACE IAC VALVE AND ECT SENSOR AND RETEST SYSTEM															
ILNLM82WERY685277 C/VB	CM	CPC	CER	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	18	7W10	010801	*	17700 * M10 33 23164
AWS Claim Key:	10037585	Trx Code:	804	Labour Hrs:	4	Labour Cost:	16.56	Material Cost:	2.63	Total Cost:	20.27					
Dir Cl-Sub Cl:	05332-*	Name:	GRUBBS FORD, LINCOLN- MERCURY, INC.	Pl:	985-7353673	St:	LA	City:	Ch:	USA	Reg:	Ch:	NA	Repr:	Date:	Doc:
Task Comments:	REARVIEW MIRROR FELL OFF															
Task Comments:	REINSTALL REARVIEW MIRROR															
ILNLM82WERY685277 C/VB	CM	CPC	CER	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	22	6N87	010802	FOVY	8213 B B63 33 27261
AWS Claim Key:	12012637	Trx Code:	804	Labour Hrs:	1	Labour Cost:	41.39	Material Cost:	7.35	Total Cost:	51.96					
Dir Cl-Sub Cl:	05332-*	Name:	GRUBBS FORD, LINCOLN- MERCURY, INC.	Pl:	985-7353673	St:	LA	City:	Ch:	USA	Reg:	Ch:	NA	Repr:	Date:	Doc:
Task Comments:	HOOD BUMP BUM LOOSE															
Task Comments:	REMOVED GRILL AND REPLACED HOOD BUMP BUM AND REASSEMBLED CAUSE: LOOSE FIT.															
ILNLM82WERY685277 C/VB	CM	CPC	CER	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	22	6N86	170302	F3VY	5442/866 A L29 D1 27261
AWS Claim Key:	12012638	Trx Code:	804	Labour Hrs:	1	Labour Cost:	41.39	Material Cost:	146.4	Total Cost:	246.33					
Dir Cl-Sub Cl:	05332-*	Name:	GRUBBS FORD, LINCOLN- MERCURY, INC.	Pl:	985-7353673	St:	LA	City:	Ch:	USA	Reg:	Ch:	NA	Repr:	Date:	Doc:
Task Comments:	TAIL LAMP LENS HAS MOISTURE IN IT.															
Task Comments:	REMOVED TRIM ON TRUNK, BACK SIDE. REPLACED REAR TAIL LAMP LENS. CAUSE: POROSITY															
ILNLM82WERY685277 C/VB	CM	CPC	CER	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	27	7M61	150202	F3AZ	18486 A A07 42 33302
AWS Claim Key:	1392641	Trx Code:	803	Labour Hrs:	4	Labour Cost:	16.56	Material Cost:	24	Total Cost:	50.16					
Dir Cl-Sub Cl:	05332-*	Name:	GRUBBS FORD, LINCOLN- MERCURY, INC.	Pl:	985-7353673	St:	LA	City:	Ch:	USA	Reg:	Ch:	NA	Repr:	Date:	Doc:

Claim Comments:	POWER ANTENNA INOP.																			
Tech Comments:	CHECKED ANTENNA, NOT WORKING. REPLACED ANTENNA MASS ASSEMBLY. CAUSE: ROTATIVE COMPONENT.																			
1LNLM82W8RY685277 C/VB	CM	C/C	C/R	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	27	7005	000905	FIDE	20013	A	H1P	28	23002
AWS Claim Key:	1922692	Trx Code:	B3	Labor Hrs:	2.5	Labor Cost:	103.48	Material Cost:	31.03	Total Cost:	132.92									
Dir Cl-Sub Cl:	09832-A	Name:	ORLEANS FORD, LINCOLN-MERCURY, INC.			Ph:	915-7335675	St:	LA	City:	Ch:	USA	Reg Cl:	NA	Repr Date:	05-MAR-1994	Doc #:	0921162		
Claim Comments:	ANTI LOCK LIGHT COMER ON.																			
Tech Comments:	TEST DRIVE FOR ANTI LOCK LIGHT ON. RAN DIAGNOSIS TEST, CODE 67. RAN PINPOINT TEST, B1 TERM U2. REPLACED PUMP MOTOR RELAY. RETESTED AND LIGHT STILL ON. RETURNED TO PINPOINT TEST B2, NO POWER AT CIRCUIT 532. DISCONNECTED MODULE, CHECKED FOR POWER AT PIN 3 AND 33. LJV IN RUN POSITION. STARTED TRACING DOWN OPEN CIRCUIT. FOUND OPEN IN CIRCUIT AFTER B133 IN CIRCUIT 532 BY WIRE REPAIR.																			
1LNLM82W8RY685277 C/VB	CM	C/C	C/R	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	27	7005	150101	FSPZ	19A390	A	A86	01	33500
AWS Claim Key:	1412832	Trx Code:	B3	Labor Hrs:	5	Labor Cost:	20.7	Material Cost:	45	Total Cost:	83.7									
Dir Cl-Sub Cl:	09832-A	Name:	ORLEANS FORD, LINCOLN-MERCURY, INC.			Ph:	915-7335675	St:	LA	City:	Ch:	USA	Reg Cl:	NA	Repr Date:	25-MAR-1994	Doc #:	0922251		
Claim Comments:	TELEPHONE ANTENNA PULL OFF.																			
Tech Comments:	INSTALLED AND REPAIRED ANTENNA FOR PHONE ON REAR GLASS.																			
1LNLM82W8RY685277 C/VB	CM	C/C	C/R	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	32	7001	110601	P2VY	9C28E	A	A99	01	44831
AWS Claim Key:	1502930	Trx Code:	B3	Labor Hrs:	2	Labor Cost:	10.63	Material Cost:	29.34	Total Cost:	51.71									
Dir Cl-Sub Cl:	12211-A	Name:	TOM WIMBERLEY AUTO WORLD INC			Ph:	601-9660650	St:	MS	City:	Ch:	USA	Reg Cl:	NA	Repr Date:	20-AUG-1996	Doc #:	04465301		
Claim Comments:	CHECK CONTROL BUTTERFLY ON STEERING WHEEL. BROKEN OFF																			
Tech Comments:	REPLACED SWITCHES																			
1LNLM82W8RY685277 C/VB	CM	C/C	C/R	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	32	7W12	011407	P4VY	34432A38	A	B13	08	44831
AWS Claim Key:	1502932	Trx Code:	B3	Labor Hrs:	3	Labor Cost:	15.95	Material Cost:	99.22	Total Cost:	154.86									
Dir Cl-Sub Cl:	12211-A	Name:	TOM WIMBERLEY AUTO WORLD INC			Ph:	601-9660650	St:	MS	City:	Ch:	USA	Reg Cl:	NA	Repr Date:	20-AUG-1996	Doc #:	04465302		
Claim Comments:	CHECK TRUNK DOES NOT CLOSE																			
Tech Comments:	REPLACED PULL DOWN MOTOR																			
1LNLM82W8RY685277 C/VB	CM	C/C	C/R	C/B	BA	C/DK	C/VN	21- DEC- 1993	10-JAN- 1994	322600	USA	32	3A08	070100	F3ZZ	7502	ARM	P67	08	44831
AWS Claim Key:	1502948	Trx Code:	B3	Labor Hrs:	4.9	Labor Cost:	200.44	Material Cost:	161.09	Total Cost:	486.01									

EWS-025 18078

Dir Cl-Sub Cl:	12211-*	Name:	TOM WIMBERLEY AUTO WORLD INC	Pl:	601-9566060	St:	MS	City:	Clt	USA	Reg:	Cl:	NA	Repair Date:	20-AUG-1996	Dec:	#04465303
Cost Comments:	CHECK HESITATES ON ACCELERATION AROUND 40 MPH																
Task Comments:	REPLACED TORQUE CONVERTER																
ILNLMZWR8Y685277 C/VB	CM	CPC	C/R	CB	BA	C/DK	C/VN	21-DEC-1993	10-JAN-1994	322600	USA	37	5004	040103	*	5483	* N39 08 46520
AWS Claim Key:	12211-*	Trx Code:	BS4	Labour Hrs:	5	Labour Cost:	26.50	Material Cost:	0	Total Cost:	26.50						
Dir Cl-Sub Cl:	12211-*	Name:	TOM WIMBERLEY AUTO WORLD INC	Pl:	601-9566060	St:	MS	City:	Clt	USA	Reg:	Cl:	NA	Repair Date:	31-DEC-1996	Dec:	#05137301
Cost Comments:	CHECK SQUEAK IN FRONT SUSPENSION WHEN TURN STEERING WHEEL																
Task Comments:	RD TEST AND CK OUT FT END LUBED FRONT SWAY BAR BUSHING																
ILNLMZWR8Y685277 C/VB	CM	CPC	C/R	CB	BA	C/DK	C/VN	21-DEC-1993	10-JAN-1994	322600	USA	40	6006	01052X	POVT	18978	A A99 08 48771
AWS Claim Key:	12211-*	Trx Code:	BS4	Labour Hrs:	3	Labour Cost:	15.95	Material Cost:	16.36	Total Cost:	32.31						
Dir Cl-Sub Cl:	12211-*	Name:	TOM WIMBERLEY AUTO WORLD INC	Pl:	601-9566060	St:	MS	City:	Clt	USA	Reg:	Cl:	NA	Repair Date:	23-APR-1997	Dec:	#05657101
Cost Comments:	CHECK BOTH FRONT DOOR SPEAKER COVERS PARTS ARE IN																
Task Comments:	REPLACED BOTH COVERS																
ILNLMZWR8Y685277 C/VB	CM	CPC	C/R	CB	BA	C/DK	C/VN	21-DEC-1993	10-JAN-1994	322600	USA	40	7H12	1203XX	*	19980	* C20 01 48771
AWS Claim Key:	12211-*	Trx Code:	BS3	Labour Hrs:	9	Labour Cost:	47.84	Material Cost:	164.4	Total Cost:	212.24						
Dir Cl-Sub Cl:	12211-*	Name:	TOM WIMBERLEY AUTO WORLD INC	Pl:	601-9566060	St:	MS	City:	Clt	USA	Reg:	Cl:	NA	Repair Date:	23-APR-1997	Dec:	#05657102
Cost Comments:	CHECK A C BUTTON IN CRACKED																
Task Comments:	REPLACED AC CONTROL																
ILNLMZWR8Y685277 C/VB	CM	CPC	C/R	CB	BA	C/DK	C/VN	21-DEC-1993	10-JAN-1994	322600	USA	41	SN01	110301	F3AZ	3A131	A N59 42 48771
AWS Claim Key:	12211-*	Trx Code:	BS4	Labour Hrs:	9	Labour Cost:	47.84	Material Cost:	72.24	Total Cost:	120.08						
Dir Cl-Sub Cl:	12211-*	Name:	TOM WIMBERLEY AUTO WORLD INC	Pl:	601-9566060	St:	MS	City:	Clt	USA	Reg:	Cl:	NA	Repair Date:	12-MAY-1997	Dec:	#0573101
Cost Comments:	CHECK SUSPENSION SQUEAKS WHEN TURN STEERING WHEEL WHILE AT STOP																
Task Comments:	REPLACED INNER AND OUTER TIE ROD ENDS																

Any comments?

2002-02-15 15:07:11

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ENTER VIN ==> 1LNLM82W8RY685277

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

OWNER NAME :

STREET ADDR :

CITY : TERRY

N/A YY-MM-DD 96-04-23

ST/PRV: MS CTRY:

ZIP/POSTAL CODE: 39170

N/A SOURCE: P

MODEL YEAR : 94 PLANT: Y

SALE YY-MM-DD 94-01-10

BODY STYLE DESC: 4 DR SEDAN SIGNATURE

PRODUCTION YY-MM-DD 93-12-21

VEHICLE DESC : 1994 TOWN CAR

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	22	C	600	10	23
FACING	3	22	C	600		
RESPONSIBLE	1	81	C	000		

CA EMISSION : ENGINE TAG CODE : EG812AA

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 03

DSO DISTRICT :

FLEET CODE :

OPEN : 00 CLOSED : 03

DSO NUMBER :

FLEET STATUS :

ACTIVE: 02 HISTORY: 01

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

OGDB166

==>

ENTER CAMPAIGN NUMBER==> 94889 VIN==> 1LNLM82W8RY685277 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: ADAPTER FLT. BODY STYLE: 4 DR SEDAN SIGNATURE

NEW STATUS CODE:

REPAIR INFORMATION:

TYPE CODE:

CAMP DIV : 6

SUPP CODE :

REPAIR DATE:

DEALER P/A:

KIT CODE : AA

MICRO REF:

CLAIM NUM:

OASIS DATE : 94-08-12

DELETE REASON:

VENDOR N/A INFORMATION:

RESP DEALER INFORMATION:

NEW:

IND: MATCH CODE: 4

CURRENT: 1 81 000 ASSIGNED: 97-04-22 SOURCE: UR

EXTRACT DATE: 96-12-18

***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE	DESCRIPTION	DATE	TYPE	DATE	P/A	CLAIM#	MICRO#	CL	SRC
C	COMPLETE	95-02-10	B	95-01-30	06588	053294	ZPU6082		AC
M	RELEASED FOR MAILING	94-12-06							
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 (ALL DATA FIELD DATES YY-MM-DD)

I037-NO MORE DATA TO DISPLAY

OGDB166

==>

ENTER CAMPAIGN NBR ==> 94989 VIN ==> 1LNLM82W8RY685277
DEFECT : ADAPTER PLT. BODY STYLE DESC: 4 DR SEDAN SIGNATURE
RESP DEALER : 338600 BEGINNING MAILED DATE: 94-12-22 YY-MM-DD
RELEASE DESC : POSTCARD FOLLOWUP ENDING MAILED DATE : 94-12-22 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: RC999 FLEET MGMT LOC CODE: 9999
LAST NAME : W CN-411N-TBD0 INITIALS:
STREET ADDR1 :
ADDR2 : ST/PRV: LA
CITY : BOGALUSA CTRY:
ZIP/POSTAL CODE: N-A SOURCE: R N-A EFF DATE: 94-08-29 YY-MM-DD

RESP DEALER : 338600 BEGINNING MAILED DATE: 94-09-09 YY-MM-DD
RELEASE DESC : NEW ISSUE TOTAL ENDING MAILED DATE : 94-09-09 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: RC999 FLEET MGMT LOC CODE: 9999
LAST NAME : BAER GWEN W CN-411N-TBD0 INITIALS:
STREET ADDR1 : 1127 NORTH BORDER DRIVE
ADDR2 : ST/PRV: LA
CITY : BOGALUSA CTRY:
ZIP/POSTAL CODE: 70427 N-A SOURCE: F N-A EFF DATE: 94-02-04 YY-MM-DD
F1-INQUIRY F3-EXIT F4-QUIT F5-G150 F7-FIRST PAGE F8-NEXT PAGE F9-G140
I048-LAST PAGE OGDB166

==>

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 1LNLM82W8RY685277 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: PASS AIR BAG BODY STYLE: 4 DR SEDAN SIGNATURE

NEW STATUS CODE:

CAMP DIV : 6

REPAIR INFORMATION: TYPE CODE:

SUPP CODE :

REPAIR DATE: DEALER P/A:

KIT CODE : CJ

MICRO REF: CLAIM NUM:

OASIS DATE :

DELETE REASON:

VENDOR N/A INFORMATION:

RESP DEALER INFORMATION: NEW:

IND: MATCH CODE: 4

CURRENT: 1 81 000 ASSIGNED: 97-04-22 SOURCE: UR

EXTRACT DATE: 96-12-18

***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE	DESCRIPTION	DATE	TYPE	DATE	P/A	CLAIM#	MICRO#	CL	SRC
E	CAMP/PROG EXPIRED	98-02-25	E	98-02-25			EXPIRED		OL
U	UNDELIVERABLE	97-04-22	U						
M	RELEASED FOR MAILING	97-02-17							
H	AWAITING MAILING	96-11-24							

DELETE REASON:

F1-INQUIRY F2-G140 F3-EXIT F5-G130 F7-FIRST F8-NEXT F9-MORE STATUS

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

I037-NO MORE DATA TO DISPLAY

OGDB166

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ENTER CAMPAIGN NBR ==> 96L12 VIN ==> 1LNLM82W8RY685277
DEPECT : PASS AIR BAG BODY STYLE DESC: 4 DR SEDAN SIGNATURE
RESP DEALER : 322621 BEGINNING MAILED DATE: 97-03-08 YY-MM-DD
RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-03-20 YY-MM-DD
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS: D
STREET ADDR1 :
ADDR2 :
CITY : TERRY CTRY:
ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 96-04-23 YY-MM-DD

RESP DEALER : BEGINNING MAILED DATE: YY-MM-DD
RELEASE DESC : ENDING MAILED DATE : YY-MM-DD
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 :
CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE: YY-MM-DD
F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140
1048-LAST PAGE OGEB166

==>

ENTER CAMPAIGN NUMBER==> 94B56 VIN==> 1LNLM82W8RY685277 TYPE OF SEARCH: H
MODEL YEAR: DEFECT: PASS AIR BAG BODY STYLE:

NEW STATUS CODE:

REPAIR INFORMATION:

TYPE CODE: -

REPAIR DATE: -

DEALER P/A: -

MICRO REF: -

CLAIM NUM: -

DELETE REASON:

RESP DEALER INFORMATION:

NEW: - - -

CURRENT:

ASSIGNED:

SOURCE:

EXTRACT DATE:

***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE DESCRIPTION

DATE

TYPE

DATE

P/A

CLAIM#

MICRO#

CL SRC

C COMPLETE

B 95-02-08

053295 BZ11094

AC

DELETE REASON:

F1-INQUIRY F2-G140 F3-EXIT F5-G130 F7-FIRST F8-NEXT F9-MORE STATUS

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

I037-NO MORE DATA TO DISPLAY

OGDB166

5582-826 18877

==>

ENTER CAMPAIGN NBR ==> 94B56 VIN ==> 1LNLM82W8RY685277
DEFECT : _____ BODY STYLE DESC: _____
RESP DEALER : _____ BEGINNING MAILED DATE: _____ YY-MM-DD
RELEASE DESC : _____ ENDING MAILED DATE : _____ YY-MM-DD
CAMPAIGN DIV : _____ FLEET CODE: _____ FLEET MGMT LOC CODE: _____
LAST NAME : _____ INITIALS: _____
STREET ADDR1 : _____
ADDR2 : _____ ST/PRV: _____
CITY : _____ CTRY: _____
ZIP/POSTAL CODE: _____ N-A SOURCE: _____ N-A EFF DATE: _____ YY-MM-DD

RESP DEALER : _____ BEGINNING MAILED DATE: _____ YY-MM-DD
RELEASE DESC : _____ ENDING MAILED DATE : _____ YY-MM-DD
CAMPAIGN DIV : _____ FLEET CODE: _____ FLEET MGMT LOC CODE: _____
LAST NAME : _____ INITIALS: _____
STREET ADDR1 : _____
ADDR2 : _____ ST/PRV: _____
CITY : _____ CTRY: _____
ZIP/POSTAL CODE: _____ N-A SOURCE: _____ N-A EFF DATE: _____ YY-MM-DD
F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7-FIRST PAGE F8-NEXT PAGE F9=G140
E504-CAMPAIGN FOR THIS VIN NOT FOUND OGDB166

==>

ENTER CAMPAIGN NUMBER==> 94B56 VIN==> 1LNLM82W8RY685277 TYPE OF SEARCH: H
MODEL YEAR: DEFECT: ANTI-THEFT BODY STYLE:
NEW STATUS CODE: CAMP DIV :
REPAIR INFORMATION: TYPE CODE: SUPP CODE :
REPAIR DATE: DEALER P/A: KIT CODE :
MICRO REF: CLAIM NUM: OASIS DATE :
DELETE REASON: VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: NEW: IND: MATCH CODE:
CURRENT: ASSIGNED: SOURCE: EXTRACT DATE:
***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC

DELETE REASON:

F1-INQUIRY F2-G140 F3=EXIT F5=G130 F7-FIRST F8=NEXT F9-MORE STATUS
F10-ADD STATUS F11-REVISE (ALL DATA FIELD DATES YY-MM-DD)
E807-END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES

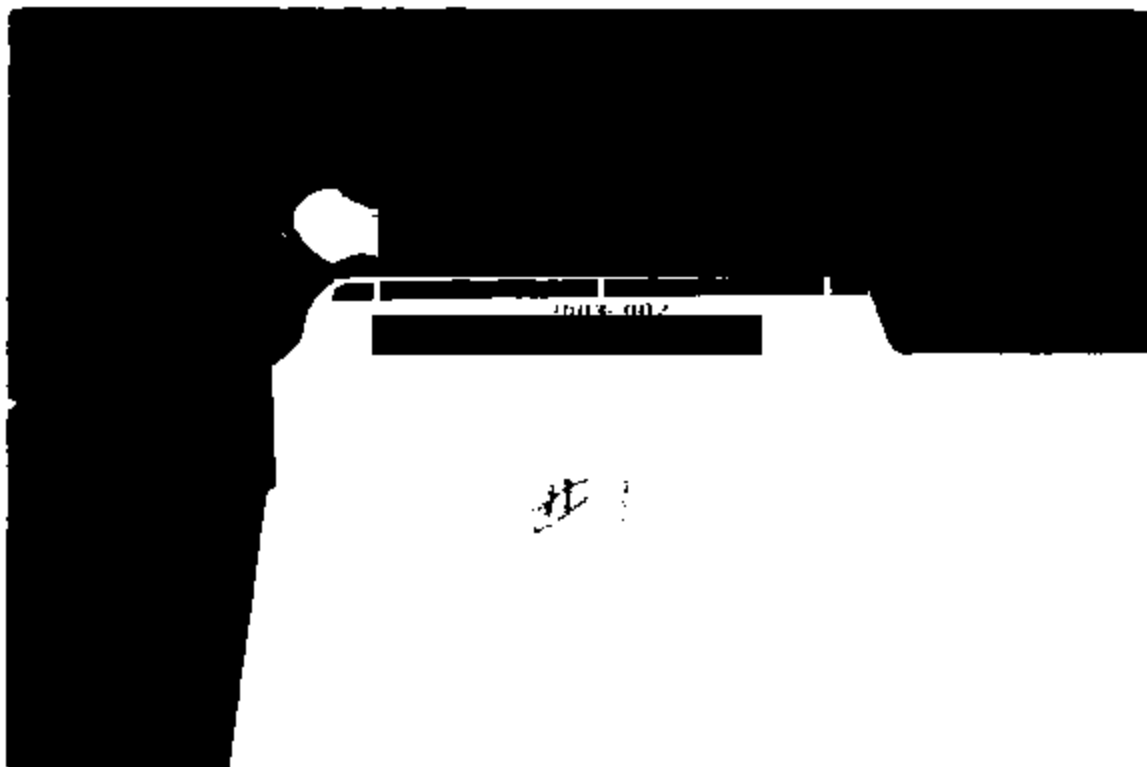
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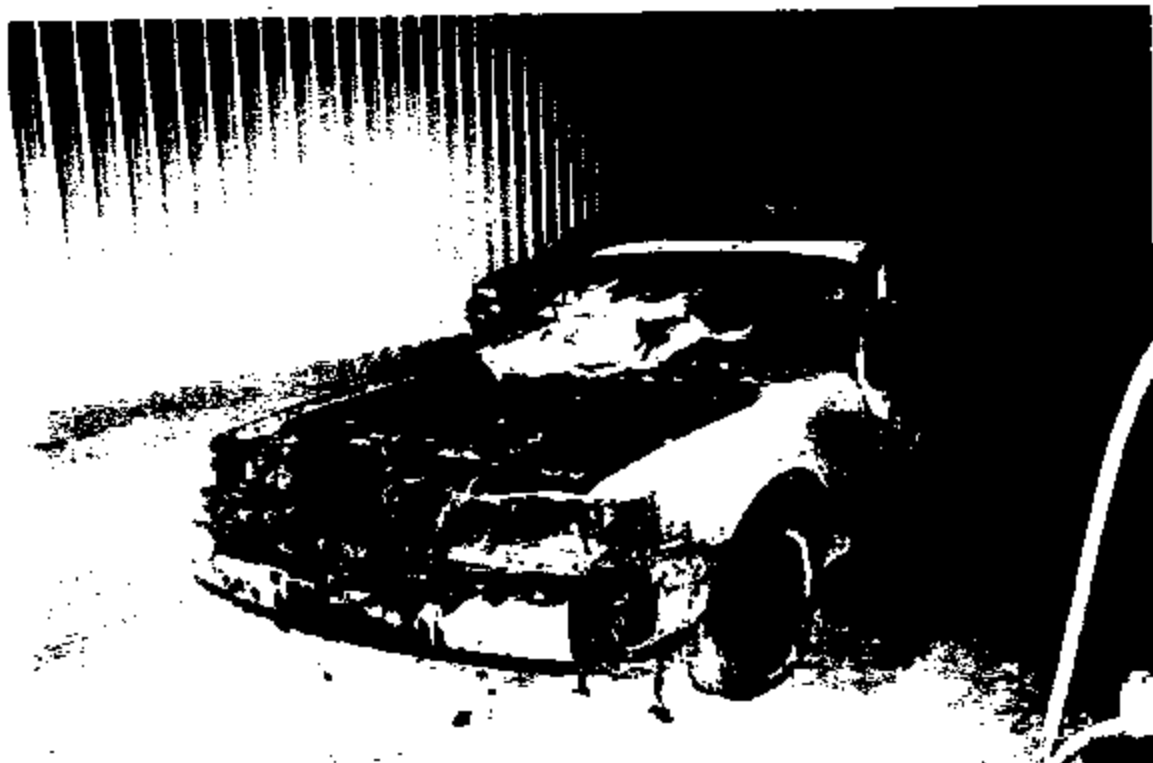
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SNORTON1
IL

02/03

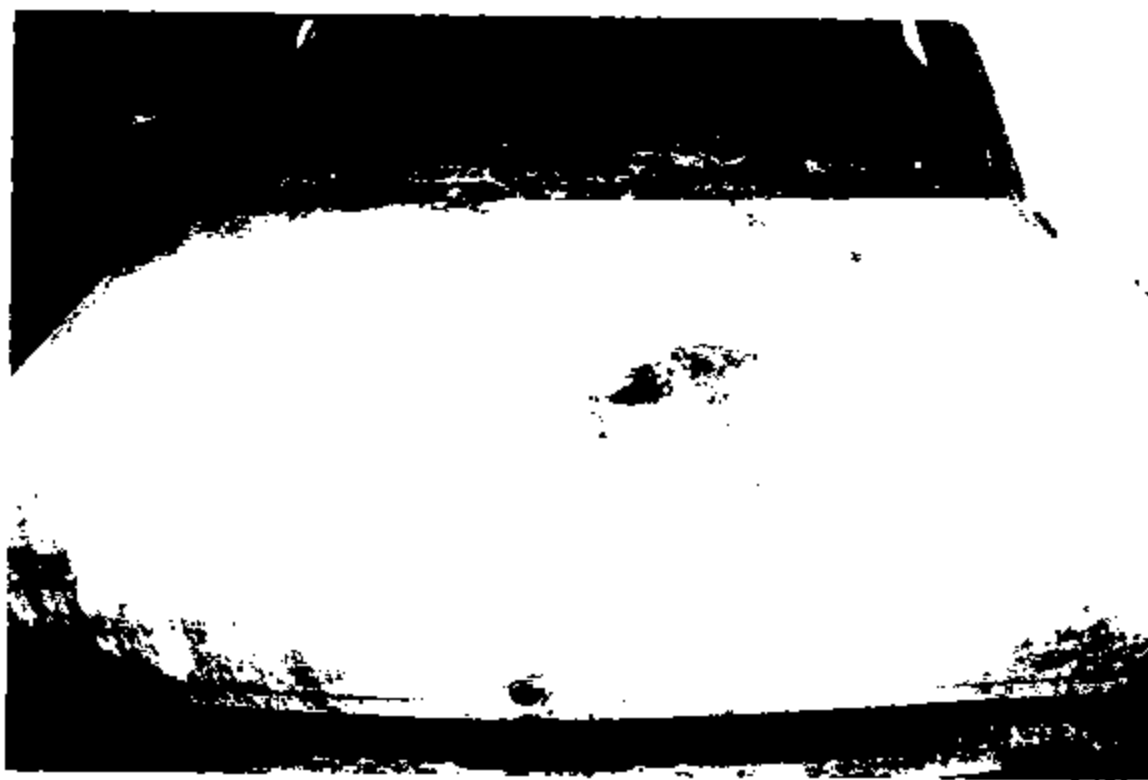
02-025 1A07

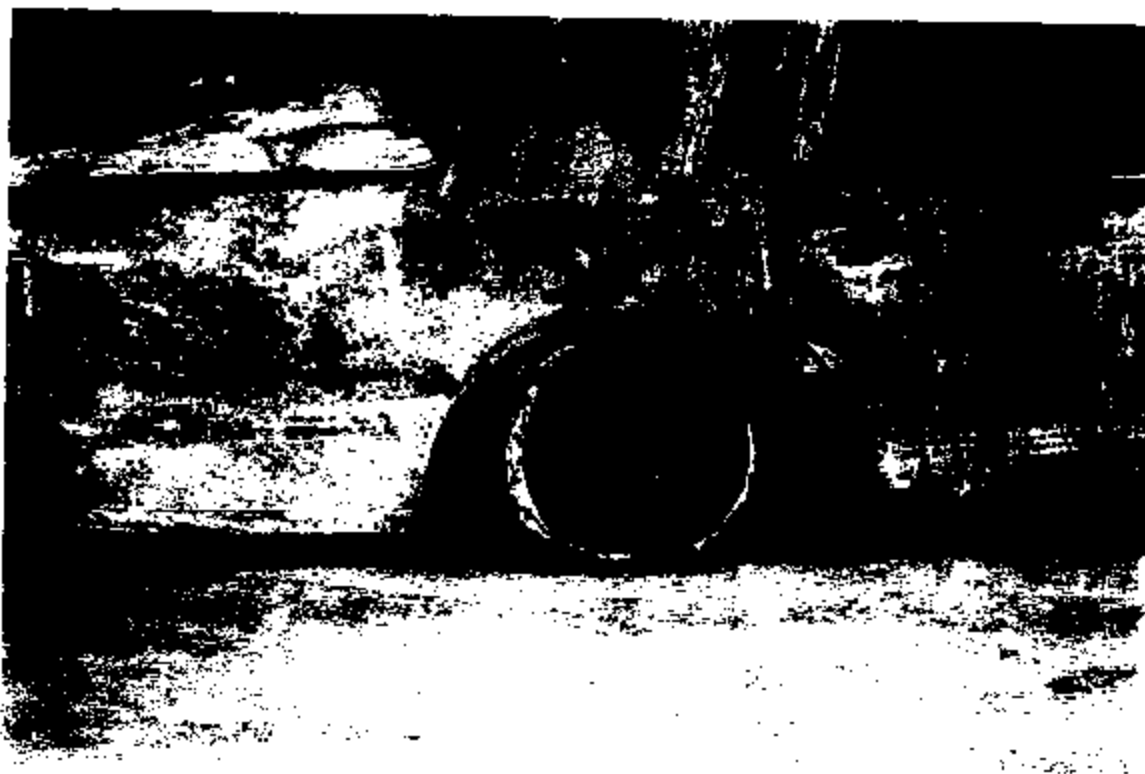
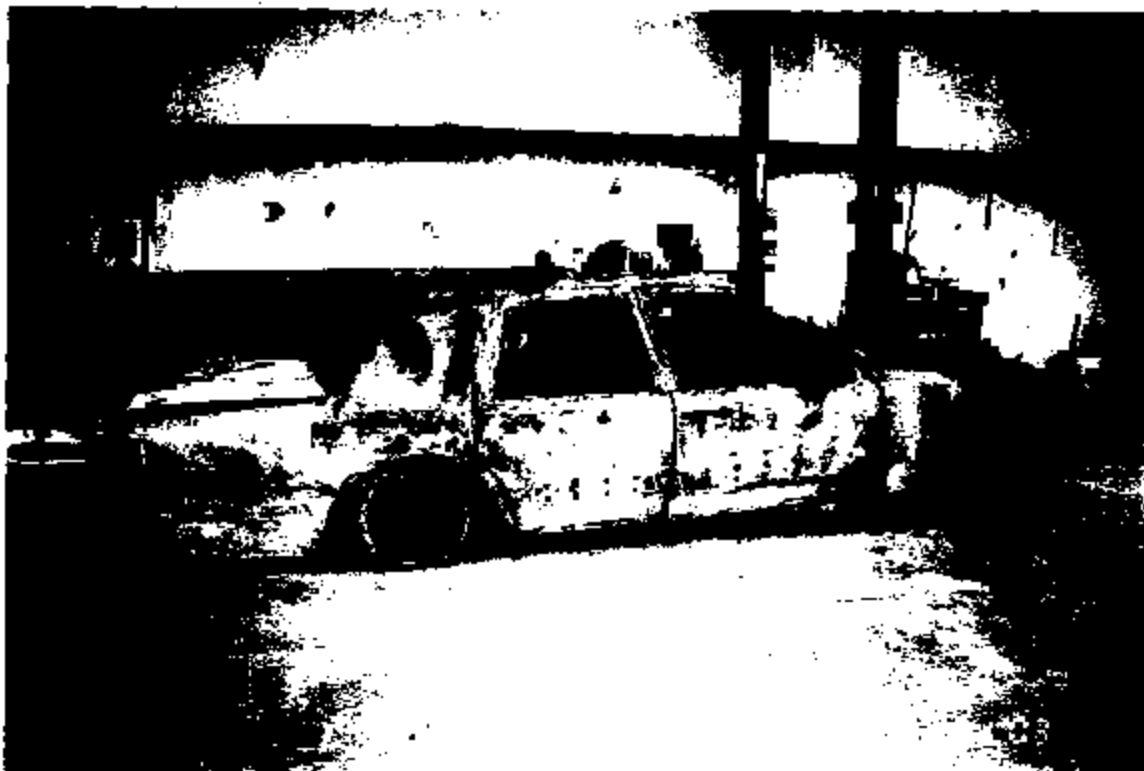




ER02-025 18689







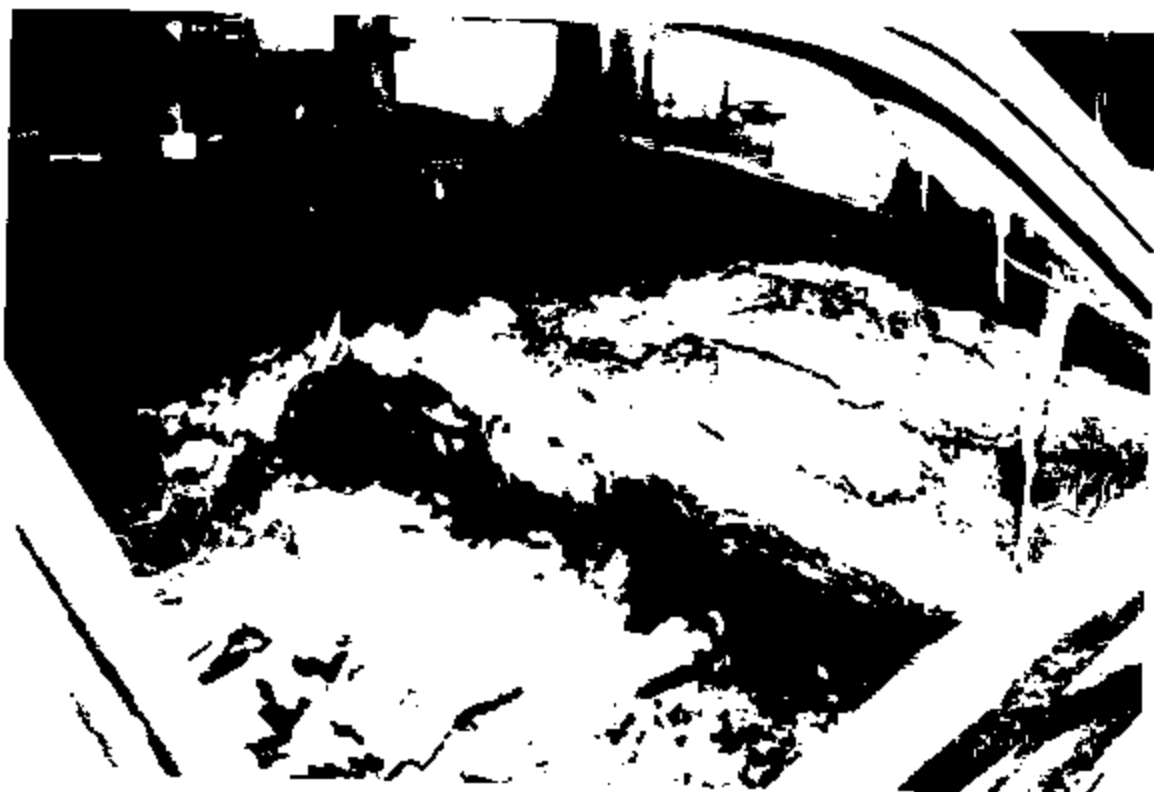


EA02-025 18593

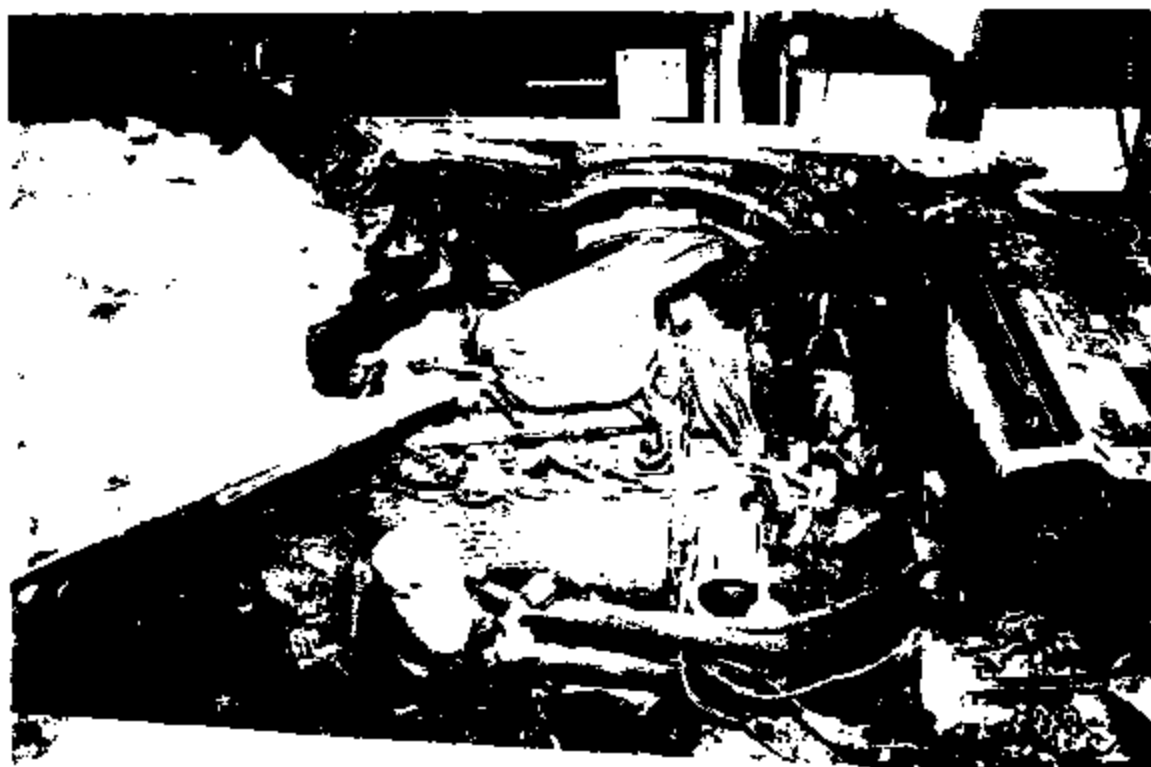


EA02-025 18884





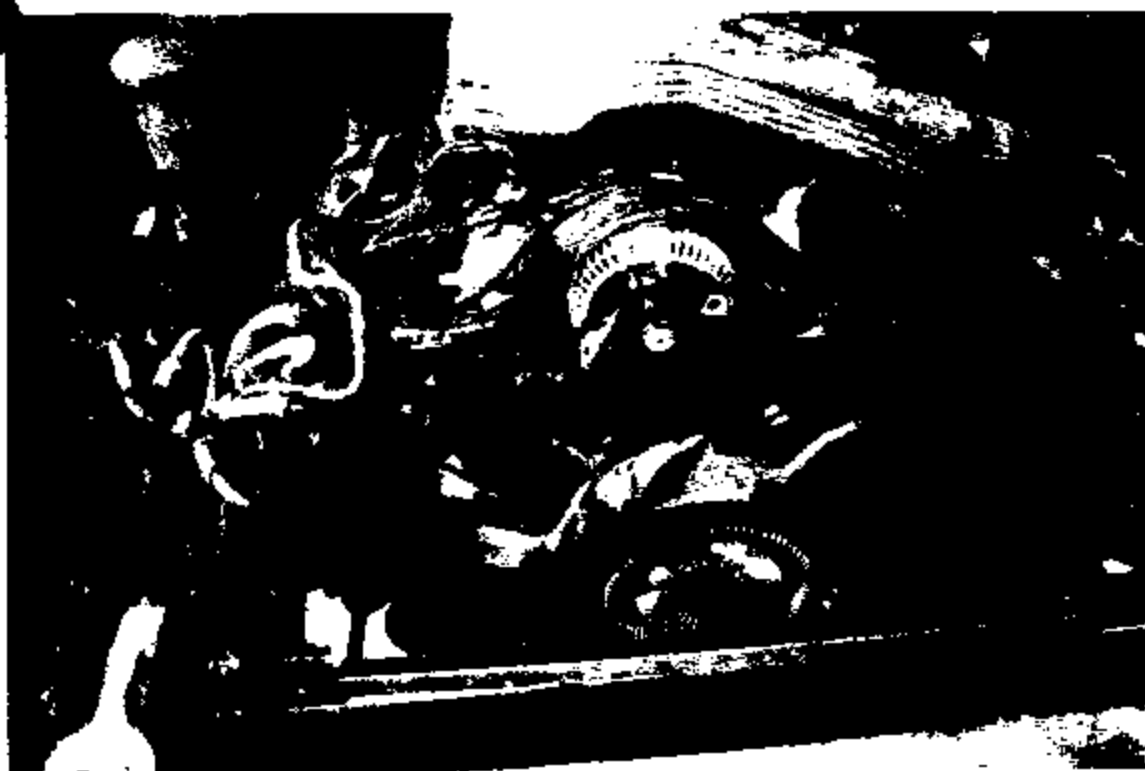
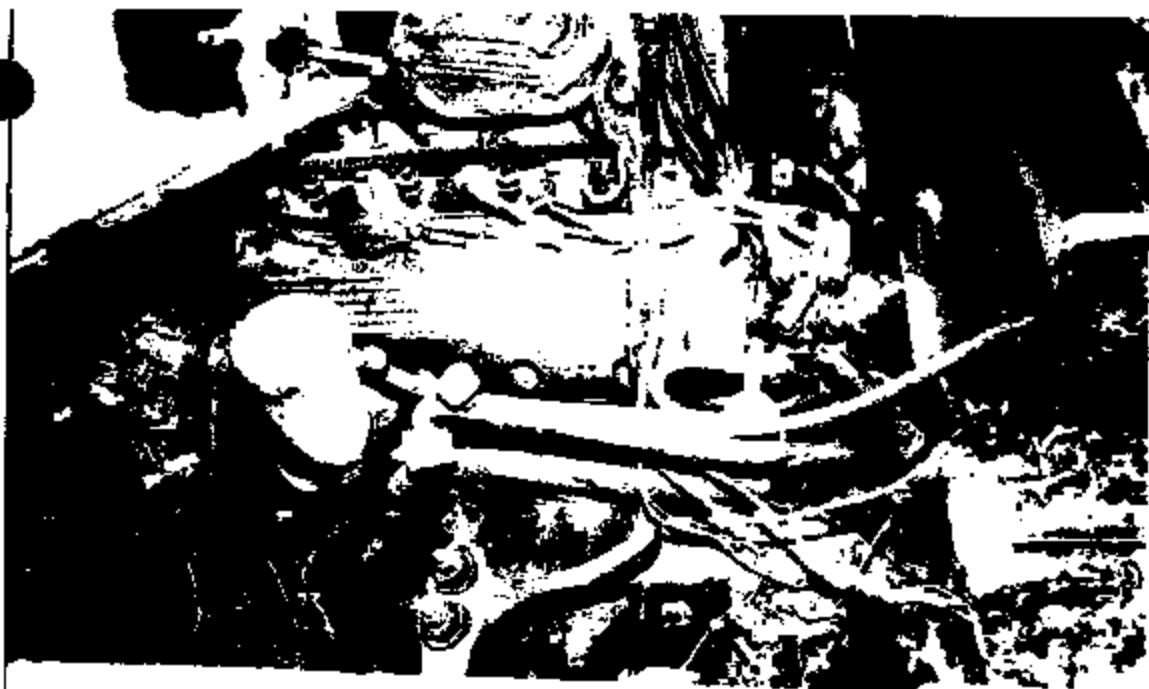
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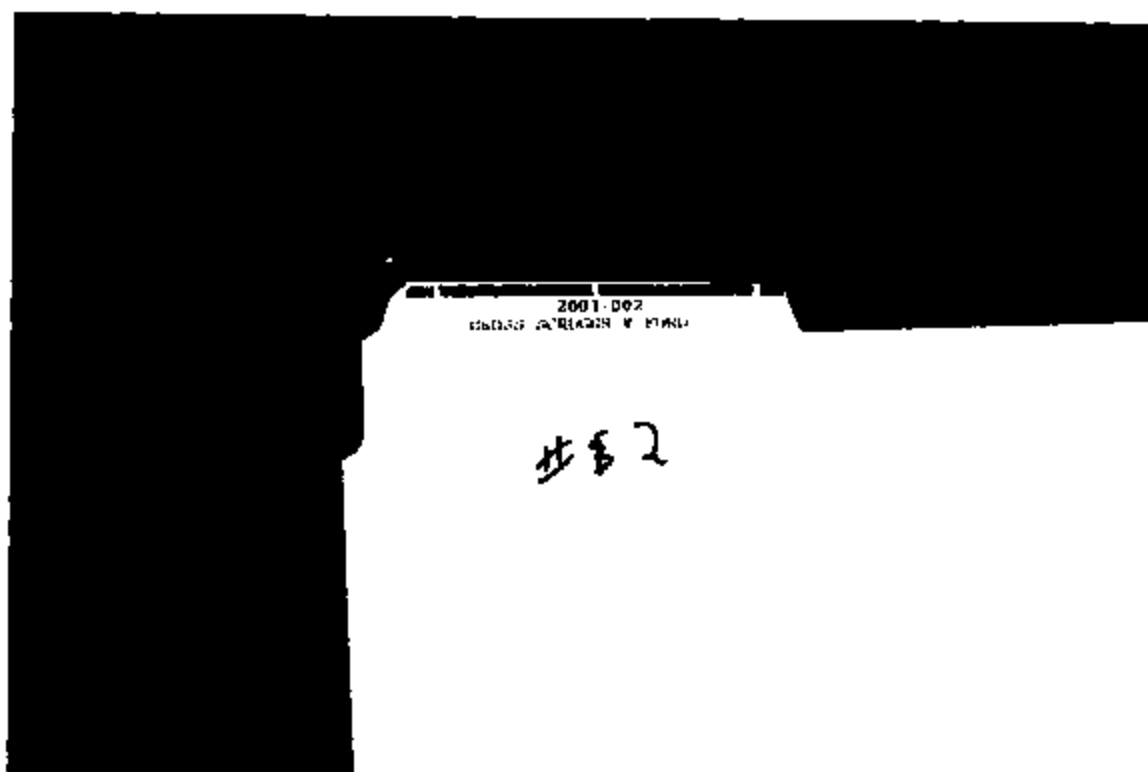
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EA02-025 18698



EA02-025 18899





EQ82-025 18701





ER02-025 18703



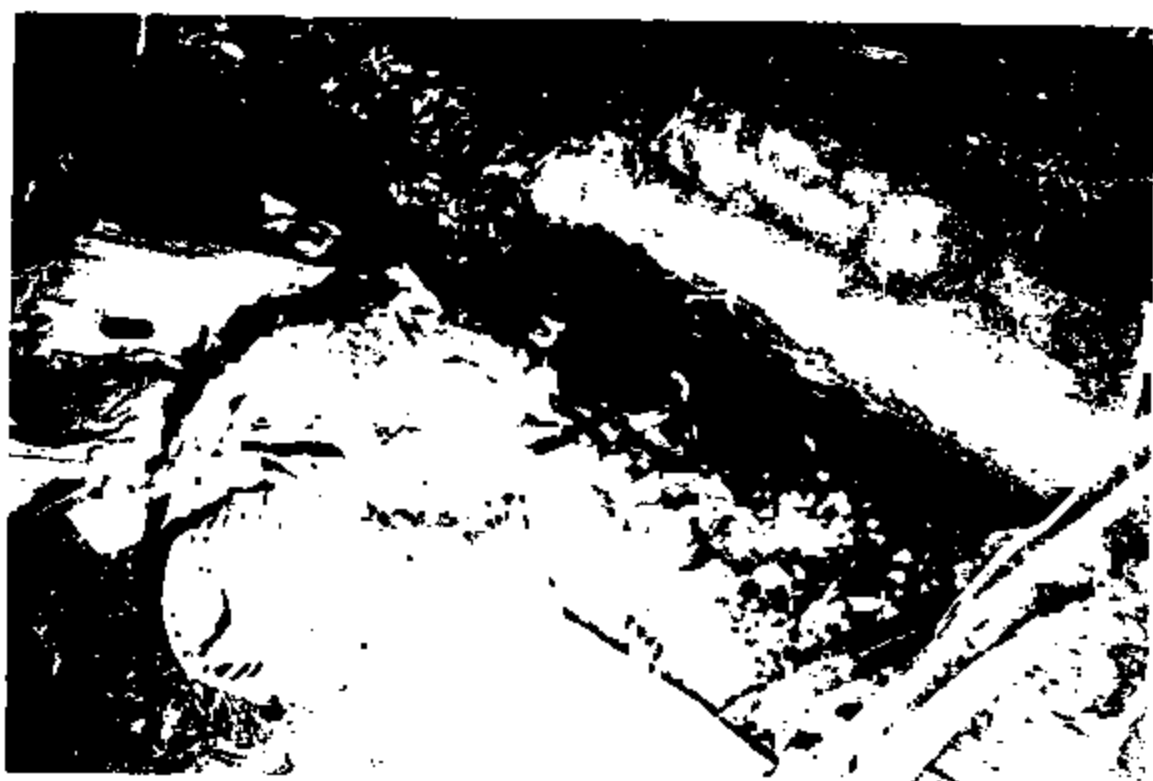




ER02-025 18785



EA02-025 10707

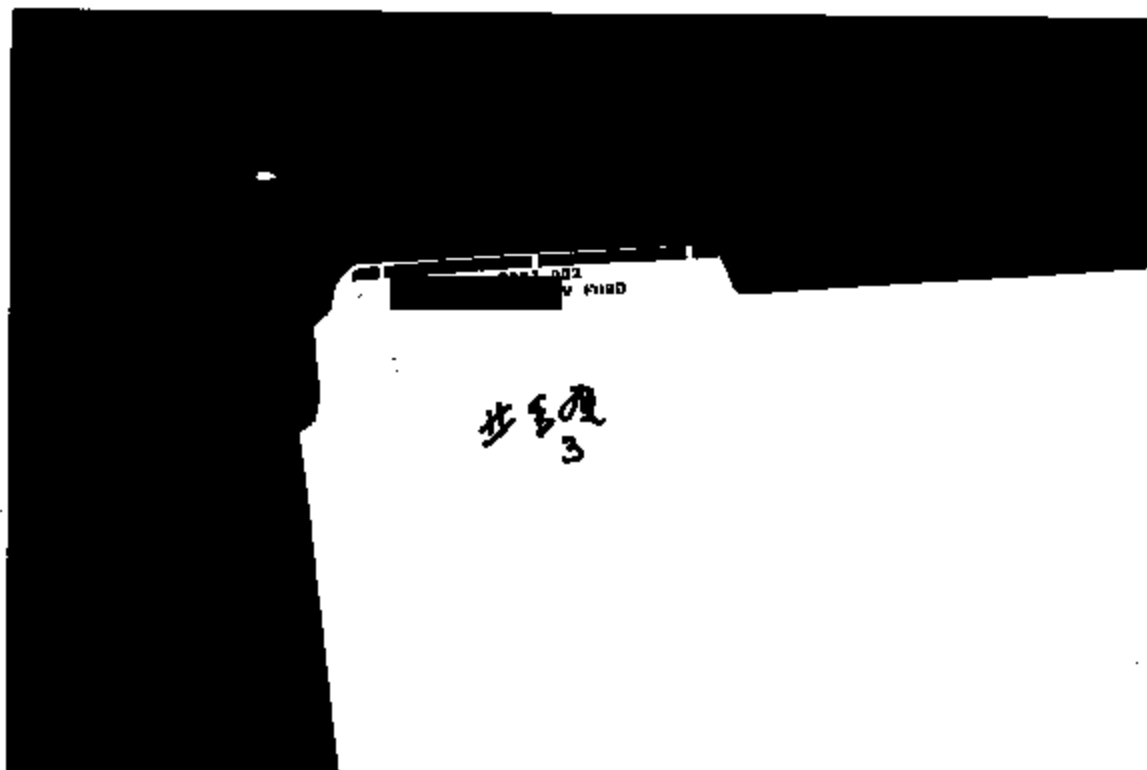


EA32-025 18708



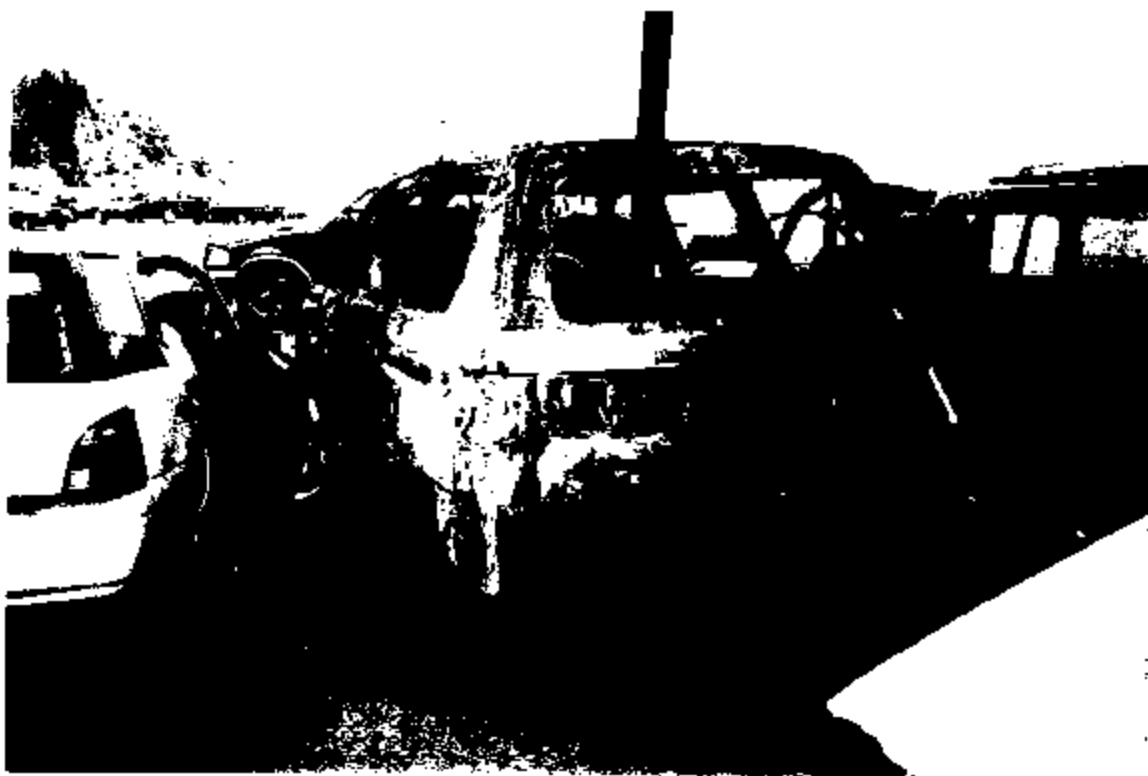


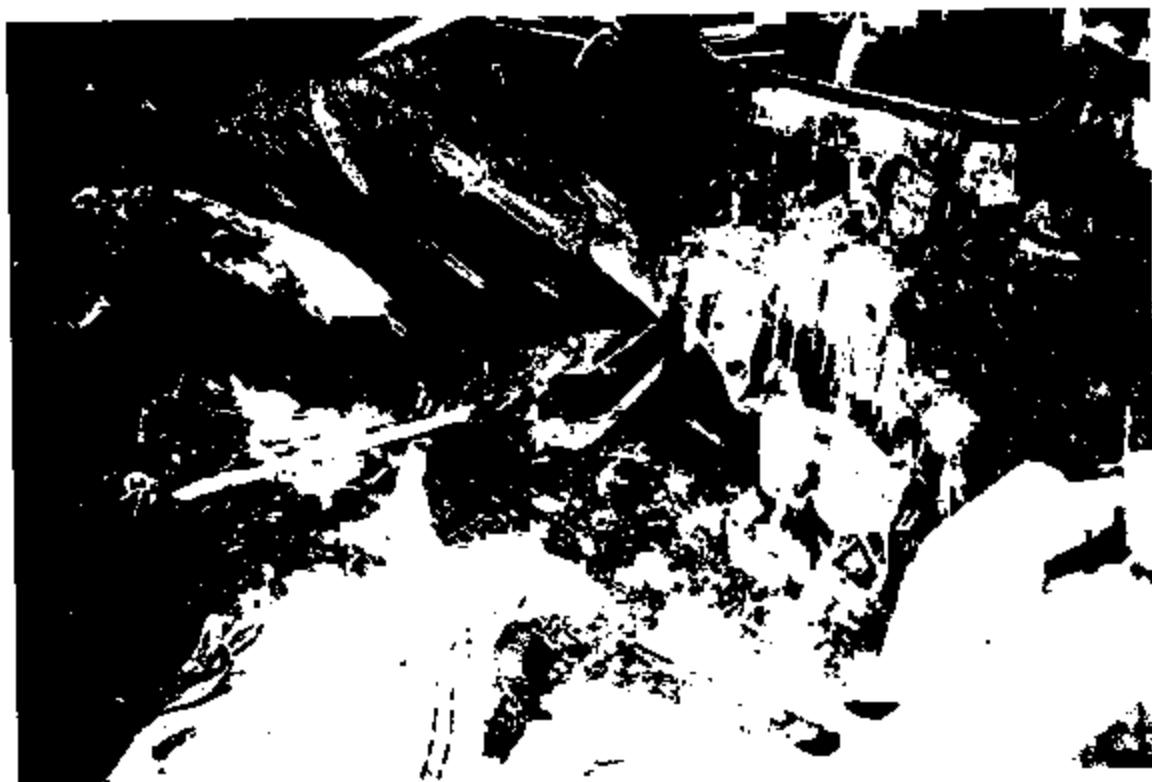
ER02-025 18710





EA82-025 18712



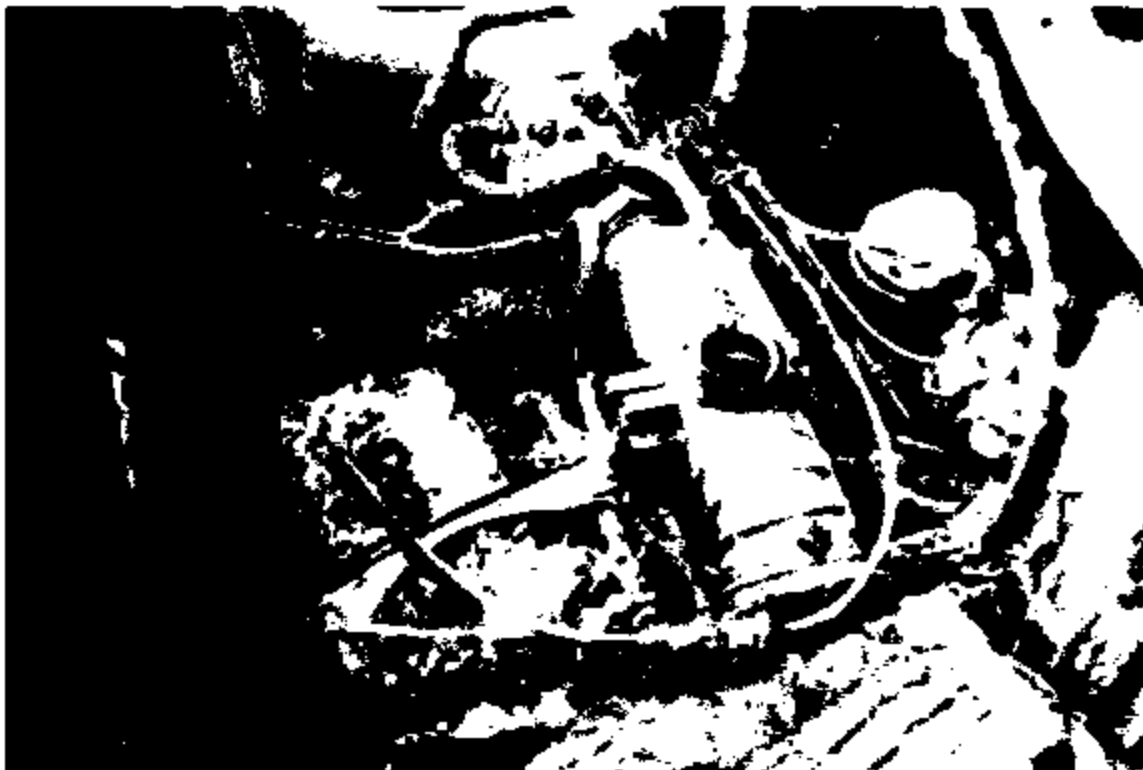




EA02-025 18715



ER02-025 18718



ER02-025 18717



ER02-025 18718



EA02-025 18719



EA82-025 18720

Ford Motor Company

Office of the General Counsel

PRIVILEGED AND CONFIDENTIAL

Ford Motor Company
Parklane Towers West
Suite 300
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

January 22, 2003

MetLife Auto & Home
P.O. Box 441-F02L
Freeport, IL 61032-0441
ATTENTION: MARK HAGEN

Re: Claimant: [REDACTED]
D/E: December 15, 2002
Y/Claim #: TAA88898

Dear Mr. Hagen:

As you may be aware our expert inspected the vehicle in question. His inspection revealed no evidence of a design or manufacturing defect present, which would have caused the accident to occur as alleged.

Therefore, we must respectfully deny this claim.

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

Sincerely,

Shawn L. Norton
Claims Analyst

ER02-025 18721

Freeport Field Claim Office
P.O. Box 441-F02L
Freeport, Illinois 61032-0441
800-964-0011

Fax: 800-310-9023
815-256-5623

MetLife Auto & Home

December 20, 2002

Notice of Claim

12/20/02

2002 DEC 27 PM 1:02

CUSTOMER
RELATIONSHIP
CENTER

**Warning! Your access to evidence may be limited unless
you respond immediately!**

Location of Loss: 5327 Orchard Lane; Tuscaloosa, AL 35405
Peril: Fire
Date of Loss: 12/15/02
Our Insured: [REDACTED]
Our Claim#: [REDACTED]
Your Product: 1993 Lincoln Town Car; VIN 1LNLM81W5PY692606

Ford Office of General Counsel
16800 Executive Plaza Drive
Dearborn, MI 48126-4207

REDACTED

Dear Ford:

You are hereby put on notice that the above identified insurance carrier, on its own behalf and that of its insured, may bring a claim against your company for property damage arising out of a fire that occurred the address listed above.

Our preliminary investigation indicates that you, either alone or in conjunction with others, may be responsible for the loss inasmuch as the available evidence and preliminary investigation points to the car as the origin of this fire.

Freeport Field Claims Office
P.O. Box 441-402L
Freeport, Illinois 61032-0441
800-854-6011

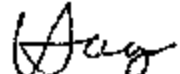
Fax: 800-810-8023
815-866-5623

MetLife Auto & Home

You are hereby given the opportunity to have a representative of your company examine the fire scene before restoration is begun or the scene is otherwise substantially altered. Due to our insured's need to restore the fire scene, as well as the health and safety concerns in regard to leaving the scene in its present state, there is only a very limited period of time that the fire scene can be left undisturbed for your examination. Accordingly, questions regarding this notice, this claim, or directions to the fire scene should be directed to the undersigned at (608) 835-1913.

You are strongly encouraged to acknowledge receipt of the Notice by return phone call as soon as possible if you wish to preserve your access to the fire scene or other evidence. However, your failure to acknowledge receipt of this Notice will not delay the time scheduled for restoration, cleanup or any other material changes in the fire scene.

Sincerely,


Mark D. Hagen
Subrogation Adjuster

==>

ENTER VIN ==> 1LNLM81W5PY692606

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

OWNER NAME :

STREET ADDR :

CITY : TUSCALOOSA

ST/PRV: AL CTRY:

ZIP/POSTAL CODE: [REDACTED] N/A YY-MM-DD 96-09-19

MODEL YEAR : .93 PLANT: Y

N/A SOURCE: P

BODY STYLE DESC: 4 DR SEDAN

SALE YY-MM-DD 93-02-11

VEHICLE DESC : 1993 TOWN CAR

PRODUCTION YY-MM-DD 93-01-26

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	88	E	214	45	CC
FACING	3	25	E	707		
RESPONSIBLE	3	26	E	330		

CA EMISSION : ENGINE TAG CODE : 3G812AA

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 02

DSO DISTRICT :

FLEET CODE :

OPEN : 01 CLOSED : 01

DSO NUMBER :

FLEET STATUS :

ACTIVE: 01 HISTORY: 01

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

OGDB166

==>

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 1LNLM81W5PY692606 TYPE OF SEARCH: A
MODEL YEAR: 93 DEFECT: PASS AIR BAG BODY STYLE: 4 DR SEDAN

NEW STATUS CODE:

CAMP DIV : 6

REPAIR INFORMATION:

TYPE CODE:

SUPP CODE :

REPAIR DATE:

DEALER P/A:

KIT CODE : CI

MICRO REF:

CLAIM NUM:

OASIS DATE :

DELETE REASON:

VENDOR N/A INFORMATION:

RESP DEALER INFORMATION:

NEW:

IND: MATCH CODE: 4

CURRENT: 3 26 330 ASSIGNED: 96-12-19 SOURCE: PX

EXTRACT DATE: 96-12-19

***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE	DESCRIPTION	DATE	TYPE	DATE	P/A	CLAIM#	MICRO#	CL	SRC
F	FORCED COMPLETION	98-01-22	B	98-01-22					OL
M	RELEASED FOR MAILING	97-02-25							
H	AWAITING MAILING	96-11-22							

DELETE REASON:

F1=INQUIRY F2=G140 F3=EXIT F5=G130 F7=FIRST F8=NEXT F9=MORE STATUS

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

I037-NO MORE DATA TO DISPLAY

OGDB166

==>

ENTER CAMPAIGN NBR ==> 96L12 VIN ==> 1LNLM81W5PY692606
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DR SEDAN
RESP DEALER : 326330 BEGINNING MAILED DATE: 97-03-08 YY-MM-DD
RELEASE DESC : NI PART KIT CODE ENDING MAILED DATE : 97-03-21 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 : ST/PRV: AL
CITY : TUSCALOOSA CTRY:
ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 96-09-19 YY-MM-DD

RESP DEALER : BEGINNING MAILED DATE: YY-MM-DD
RELEASE DESC : ENDING MAILED DATE : YY-MM-DD
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 : ST/PRV:
CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE: YY-MM-DD
F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140
I048-LAST PAGE OGDB166

=>

ENTER CAMPAIGN NUMBER==> 95B64 VIN==> 1LNLM81W5PY692606 TYPE OF SEARCH: H
MODEL YEAR: DEFECT: PASS AIR BAG BODY STYLE:

NEW STATUS CODE:

REPAIR INFORMATION:

TYPE CODE:

REPAIR DATE:

DEALER P/A:

MICRO REF:

CLAIM NUM:

DELETE REASON:

RESP DEALER INFORMATION:

NEW:

CURRENT:

ASSIGNED:

SOURCE:

CAMP DIV :

SUPP CODE :

KIT CODE :

OASIS DATE :

VENDOR N/A INFORMATION:

IND: MATCH CODE:

EXTRACT DATE:

***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****

CODE DESCRIPTION

DATE

TYPE

DATE

P/A

CLAIM# MICRO#

CL SRC

M RELEASED FOR MAILING

95-10-06

DELETE REASON:

F1=INQUIRY F2=G140 F3=EXIT F5=G130 F7=FIRST F8=NEXT F9=MORE STATUS

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

I037-NO MORE DATA TO DISPLAY

OGDB166

==>

ENTER CAMPAIGN NBR ==> 95B64

VIN ==> 1LNLM81W5PY632606

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

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

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

E504-CAMPAIGN FOR THIS VIN NOT FOUND

OGDB166

CSCN150

CAMPAIGN VEHICLE INFORMATION

01/03/03 07:29:40

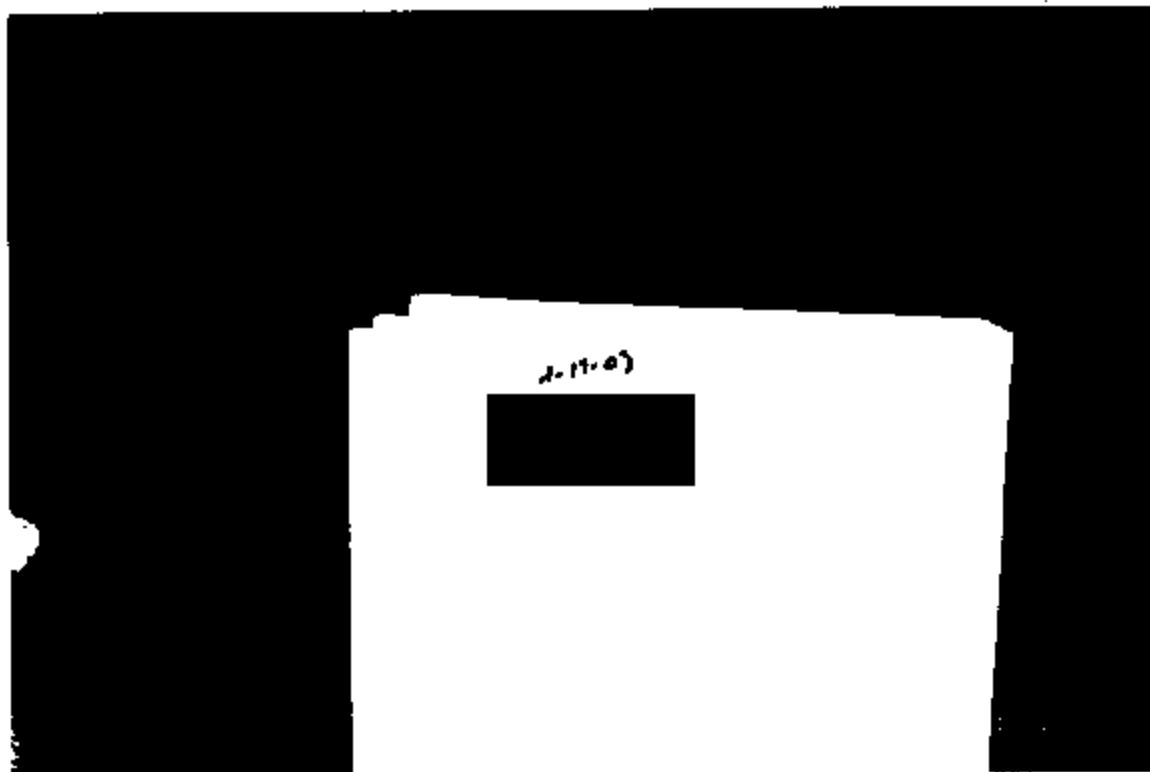
ENTER CAMPAIGN NUMBER==> 95B64 VIN==> 1LNLM81W5PY692606 TYPE OF SEARCH: H
MODEL YEAR: DEFECT: RANGE SENSOR BODY STYLE:
NEW STATUS CODE: CAMP DIV :
REPAIR INFORMATION: TYPE CODE: SUPP CODE :
REPAIR DATE: DEALER P/A: KIT CODE :
MICRO REF: CLAIM NUM: OASIS DATE :
DELETE REASON: VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: NEW: - - - IND: MATCH CODE:
CURRENT: ASSIGNED: - - - SOURCE: EXTRACT DATE:
***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC

DELETE REASON:

F1=INQUIRY F2=G140 F3=EXIT F5=G130 F7=FIRST F8=NEXT F9=MORE STATUS
F10=ADD STATUS F11=REVISE (ALL DATA FIELD DATES YY-MM-DD)

E807-END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES

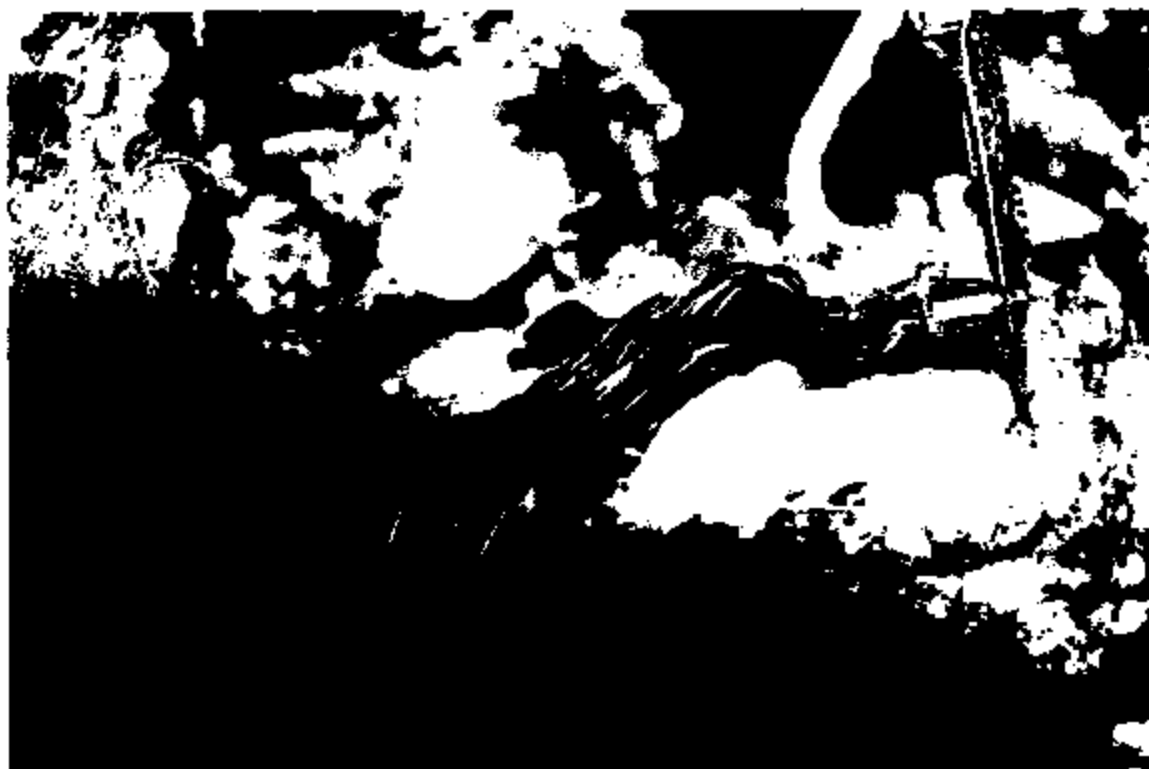
OGDB166



ER02-025 18730







EA02-025 15733



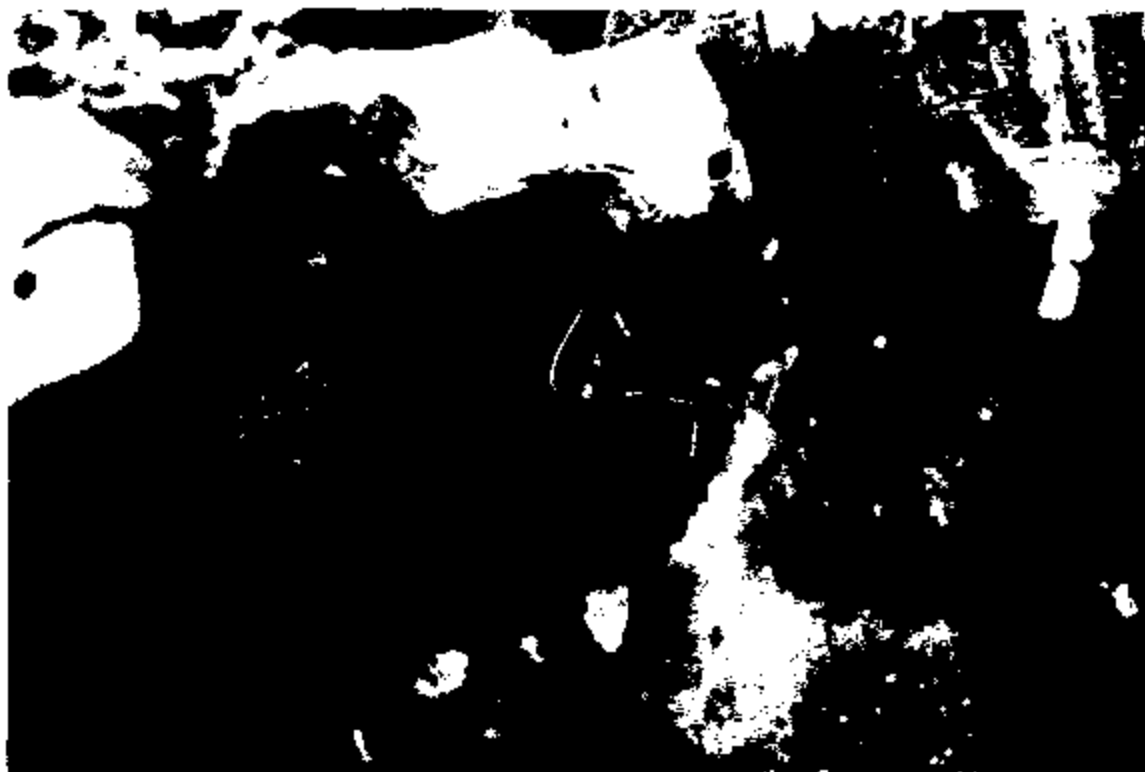
ER02-025 18734







ER02-025 18737



ER02-025 18738







v Ford Motor Company
LMMS # 455681
State of Texas
Doug Lampe

ENR2-026 36349

CAUSE NO.

2001-42886

ASSESSED
ENTERED
VERIFIED

IN THE 25 DISTRICT COURT

VS.

FORD MOTOR COMPANY AND
TEXAS INSTRUMENTS, INC.

Defendants

HARRIS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

NOW COMES, Farmers Insurance Exchange as subrogee of

Plaintiff, complaining of Ford Motor Company ("Ford") and Texas
Instruments, Inc. ("T.I.") and would show the Court the following:

I.
DISCOVERY

Discovery shall be conducted according a Level 2 Discovery Control Plan under the
Texas Rules of Civil Procedure.

II.
PARTIES AND SERVICE

1. Plaintiff is an insurance company licensed to do business in the State of Texas.
2. Ford Motor Company is a Delaware Corporation and may be served with citation through its registered agent for service of process, that being C.T. Corporation Systems, 350 N. St. Paul Street, Dallas, Dallas County, Texas 75201.
3. Texas Instruments, Inc. is a Delaware Corporation and may be served with citation through its registered agent for service of process, that being Mr. Joseph F. Hubach, 7839 Church

LAW OFFICES OF
BURT BARR & ASSOCIATES, L.L.P.
304 S. RECORD
DALLAS, TEXAS 75202

FARMERS INSURANCE EXCHANGE'S
ORIGINAL PETITION - PAGE 1
f:\b\20004.4\pleading\urack-las.wch-org.petition.BDW:law

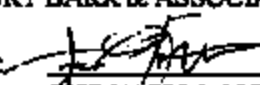
EP82-625 38358

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendants be served with citation and that upon trial of this cause that Plaintiffs have judgment against Defendants, jointly and severally, for its damages, its costs, for pre-judgment and post-judgment interest allowed by law, and for such further relief as it may show itself to be justly entitled.

Respectfully Submitted,

BURT BARR & ASSOCIATES, L.L.P.

By: 

JOHN HOLMAN BARR

SBN: 01798700

JASON GRAHAM

SBN: 24007259

304 SOUTH RECORD

DALLAS, TEXAS 75202

TELEPHONE (214) 742-8001

FACSIMILE: (214) 741-6744

BRIAN WENDT
214 755 3176

JASON
GRAHAM
214 757 9600 → FLETCHER
SPRINGER
DALLAS

LAW OFFICES OF
BURT BARR & ASSOCIATES, L.L.P.

304 S. RECORD
DALLAS, TEXAS 75202

FARMERS INSURANCE EXCHANGE'S
ORIGINAL PETITION - PAGE 4

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0002-025 38351

Hill Way, MS 3999, Dallas, Dallas County, Texas 75251.

III. JURISDICTION AND VENUE

Jurisdiction is proper in that the amount in controversy in this case exceeds the minimum jurisdictional limits of this court. Venue is proper because this incident arose in Harris County, Texas.

IV. FACTS

On August 27, 2000, [REDACTED] owned or controlled the building and premises located at [REDACTED] in South Houston, Harris County, Texas. At that time [REDACTED] was insured by a policy of insurance issued by Plaintiff which covered said premises and contents for damages caused by fire. On that date, [REDACTED] was storing a 1993 Lincoln Town Car automobile on the above premises. Also on that date, the above premises and the contents were severely damaged by fire. Plaintiff asserts that an defective part, specifically a speed control deactivation switch, within the Lincoln Town Car was defective and caught fire, thereby causing other nearby combustibles in and around the Town Car and around it to ignite. This process caused the fire which damaged Plaintiff as set forth below.

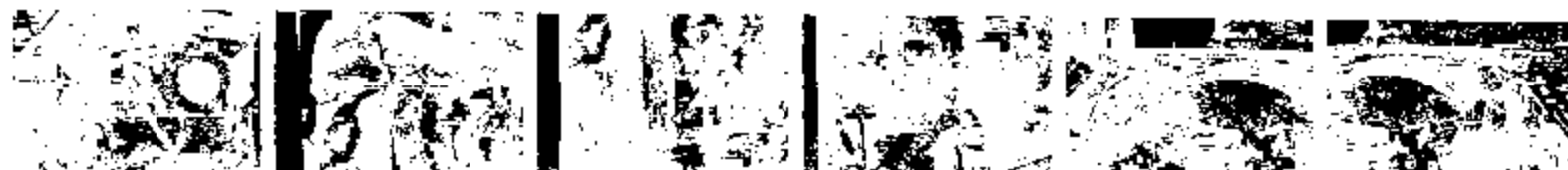
V. NEGLIGENCE

The above automobile was designed, manufactured and marketed by Ford. Within said automobile was a component part known as a speed control deactivation switch ("the switch"), which was manufactured by T.L. Plaintiff asserts that this part, which is the subject of product recall by Ford, was defective and was the proximate cause of Plaintiff's damages. Specifically,

LAW OFFICES OF
BURT BARR & ASSOCIATES, L.L.P.
304 S. RECORD
DALLAS, TEXAS 75202

FARMERS INSURANCE EXCHANGE'S
ORIGINAL PETITION - PAGE 2
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ER82-825 38352





4 6 9 0 5 1

FBI-025-B 10563

CT System

Service of Process Transmittal Form
Dallas, Texas

08/23/2002

TO: Chris Dzbanek
Ford Motor Company
Three Parklane Blvd., Ste. 1400 West
Dearborn, MI 48128

Phone: (313) 248-6864 ex:
FAX: (866) 868-8312
EMAIL: CDZBANSK@FORD.COM

RE: PROCESS SERVED IN TEXAS

FOR Ford Motor Company Domestic State: De

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

1. TITLE OF ACTION: [REDACTED] vs Ford Motor Company, et al
2. DOCUMENT(S) SERVED: Citation, Pliffs Original Petition
3. COURT: 157th JDC, Harris County, Tx
Case Number 200234865
4. NATURE OF ACTION: Defts were negligent in that they failed to use ordinary care in the design, manufacturing, and marketing of the Town Car and the switch, i.e. were negligent in selling the switch to Ford in an unreasonably dangerous condition.
5. ON WHOM PROCESS WAS SERVED: CT Corporation System, Dallas, Texas
6. DATE AND HOUR OF SERVICE: By Process server on 08/23/2002 at 08:30
7. APPEARANCE OR ANSWER DUE: 10:00 a.m. Monday next after expiration of 20 days
8. ATTORNEY(S): John Holman Barr
304 South record
Dallas, Tx 75202
9. REMARKS: Note sent 08/23/2002 to CDZBANSK@FORD.COM

LITIGATION
PRACTICE GROUP

02 AUG 26 P2:59

OFFICE OF THE
GENERAL COUNSEL

SIGNED CT Corporation System
PER Jessica Lucero
ADDRESS 350 North St. Paul Street
Dallas, TX 75201
SOP-WS 0004730815

Information contained on this transmittal form is recorded for CT Corporation System's record keeping purposes only and to permit quick reference for the recipient. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information that can be obtained from the documents themselves. The recipient is responsible for interpreting the documents and for taking the appropriate action.

ER02-025-B 10554

CAUSE NO. _____

IN THE 151 DISTRICT COURT

Plaintiff

vs.

FORD MOTOR COMPANY AND
TEXAS INSTRUMENTS, INC.

Defendants

HARRIS COUNTY, TEXAS

FILED
CHARLES R. BARR
DISTRICT CLERK
HARRIS COUNTY, TEXAS
JUL 11 2002 11:45 AM**PLAINTIFF'S ORIGINAL PETITION**

NOW COMES, [REDACTED] Plaintiff, complaining of Ford Motor Company ("Ford") and Texas Instruments, Inc. ("T.I.") and would show the Court the following:

I.
DISCOVERY

Discovery shall be conducted according to a Level 2 Discovery Control Plan under the Texas Rules of Civil Procedure.

II.
PARTIES AND SERVICE

1. Ford Motor Company is a Delaware Corporation and may be served with citation through its registered agent for service of process, that being C.T. Corporation Systems, 350 N. St. Paul Street, Dallas, Dallas County, Texas 75201.
3. Texas Instruments, Inc. is a Delaware Corporation and may be served with citation through its registered agent for service of process, that being Mr. Joseph F. Hubach, 7839 Church Hill Way, MS 3999, Dallas, Dallas County, Texas 75251.

LAW OFFICES OF
BURT BARR & ASSOCIATES, L.L.P.
304 S. RECORD
DALLAS, TEXAS 75202

PLAINTIFF'S
ORIGINAL PETITION - PAGE 1
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III. JURISDICTION AND VENUE

Jurisdiction is proper in that the amount in controversy in this case exceeds the minimum jurisdictional limits of this court. Venue is proper because this incident arose in Harris County, Texas.

IV. FACTS

On August 27, 2000, [REDACTED] owned or controlled the building and premises located at [REDACTED] in South Houston, Harris County, Texas. On that date, [REDACTED] was storing a 1993 Lincoln Town Car automobile on the above premises. Also on that date, the above premises and the contents were severely damaged by fire. Plaintiff asserts that a defective part, specifically a speed control deactivation switch, within the Lincoln Town Car was defective and caught fire, thereby causing severe damage to the building and its contents.

V. NEGLIGENCE AND PRODUCTS LIABILITY

The above automobile was designed, manufactured and marketed by Ford. Within said automobile was a component part known as a speed control deactivation switch ("the switch"), which was manufactured by T.I. Plaintiff asserts that this part, which is the subject of product recall by Ford, was defective and was the proximate cause of Plaintiff's damages. Specifically, Defendants were negligent in that they failed to use ordinary care in the design, manufacturing, and marketing of the Town Car and the switch, T.I. was negligent in selling the switch to Ford in an unreasonably dangerous condition. These acts and omissions by Defendants, jointly and severely, are negligent, and were the proximate cause of Plaintiff's damages as set forth below.

LAW OFFICES OF
BURT BARR & ASSOCIATES, L.L.P.
304 S. RECORD
DALLAS, TEXAS 75202

PLAINTIFF'S
ORIGINAL PETITION - PAGE 2
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EP02-025-B 10566

Defendants are jointly and severally liable for said damages. Defendants are also liable for placing into the stream of commerce an unreasonably dangerously defective product or an inherently unsafe product under Chapter 82 of the Texas Civil Practice and Remedies Code. Such product had a design defect and there were safer alternative designs. The defect in question was the producing cause of Plaintiff's property damage.

VL

Defendants are liable also under the doctrine of strict products liability. At the time of the fire, Defendants were in the business of designing, manufacturing and marketing of the switch and the Town Car. The Town Car and the switch were designed and manufactured and marketed by Defendants in defective condition which rendered the Town Car unreasonably dangerous in that it caught fire and proximately caused the damages set forth below.

VII.

Plaintiff has been damaged in a sum in excess of the minimum jurisdictional limits of this Court.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendants be served with citation and that upon trial of this cause that Plaintiff have judgment against Defendants, jointly and severally, for its damages, its costs, for pre-judgment and post-judgment interest allowed by law, and for such further relief as it may show itself to be justly entitled.

LAW OFFICES OF
BURT BARR & ASSOCIATES, L.L.P.

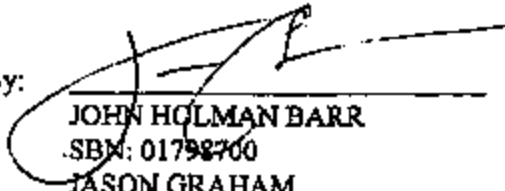
304 S. RECORD
DALLAS, TEXAS 75202

PLAINTIFF'S
ORIGINAL PETITION - PAGE 3
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EA02-825-B 10557

Respectfully Submitted,

BURT BARR & ASSOCIATES, L.L.P.

By: 

JOHN HOLMAN BARR

SBN: 01798700

JASON GRAHAM

SBN: 24007259

304 SOUTH RECORD

DALLAS, TEXAS 75202

TELEPHONE (214) 742-8001

FACSIMILE: (214) 741-6744

ATTORNEYS FOR PLAINTIFF

LAW OFFICES OF
BURT BARR & ASSOCIATES, L.L.P.

304 S. RECORD
DALLAS, TEXAS 75202

PLAINTIFF'S
ORIGINAL PETITION - PAGE 4
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EP02-025-B 10560