

EA02-025

FORD 10/27/03

APPENDIX M

BOOK 17 OF 22

PART A-D

PART C



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 541-8880, WASHINGTON 201-9220
DIRECT LINE 258-3087

P & A CODE 00089

DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE
DATE AND MILEAGE AT TIME OF VEHICLE RETURN	
DATE	MILEAGE

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM
CASHIER AND CUSTOMER PICKUP
7:30 AM TO 7:00 PM
SAT. 8:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW ☒

TAG: 0427 C RD: C22386-1
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 09/06/95 18:15:16
LIC: MD 1 STK#:000R0398
INSVC:022895 SOLD: 022895 PROD: 113093
27H418
ODOMETER IN:9870 TX: 1

10K SERVICE	TECH 707	S	11.60
COMPLETED SERVICE	OP-10K	REED, DERICH L.	
VEN PART NUMBER	DESCRIPTION	QTY	PRICE & EXTENDED
END FL 820	FILTER	1	8.63 8.63
END XO 5W30 QSP	MOTOR	5	3.31 16.55
PARTS AMOUNT			25.18
LAB AMOUNT			11.60
SERVICE SPECIAL ADJUST			11.83
LINE TOTAL - DEPT D			24.95

PARTS	25.18
SUPPLIES	2.32
LAB-MECHANICAL	11.60
SERVICE SPECIAL ADJUSTMENT	11.83
SUB-TOTAL	27.27
TAX	.78
TOTAL-CHARGES	28.05
VISA	004014 28.05

CAR RATE: 64.00

VISA /// MASTERCARD ///

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. GRESHAM



3540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 284-2100, BALTIMORE 841-8850, WASHINGTON 281-5220
DIRECT LINE 288-6087

P & A CODE 00089

VEHICLE COLOR	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:30 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW

[Signature]

EDGENATER
ANNE ARUNDEL

MD [REDACTED]

TAG# 0427 C P ROI C22386-1
2PALP74W7RX126232 DK RED/MAR

94 FORD CROWN VIC LX 4DR 8DN

INVOICED AT: 09/06/95 09:52:09

LICI MD 1 STKN: 000R0398

DATES: BEGIN: 090695 DONE: 090695 INVC: 022895 SOLD: 022895 PROD: 113093

ADV: 287 DC: 1FA

27H418

HOME: [REDACTED]
WORK: [REDACTED]

ODOMETER IN19870

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LN 10K SERVICE I TECH 707 S 11.60
31 COMPLETED SERVICE REED, DERICH L.

VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE & EXTENDED
FMC FL 620	FILTER		1	8.63 8.63
FMC XO 5W30 88F	OIL		5	3.31 16.55
PARTS AMOUNT				25.18
LAB AMOUNT				11.60
SERVICE SPECIAL ADJUST				11.83
LINE TOTAL - DEPT-D				24.95

PARTS	25.18
SUPPLIES	2.32
LAB-MECHANICAL	11.60
SERVICE SPECIAL ADJUSTMENT	11.83
SUB-TOTAL	27.27
TAX	.78
TOTAL-CHARGES	28.05
CASH DUE	28.05

LAB RATE: 44.00 PER HOUR

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. ORESHAM

MD

PAGE 1 OF 2

CUSTOMER PAY ☐ WARRANTY ☐ INTERNAL ☐ PARTS DISPOSAL: ☐ CASH ☐ CREDIT CARD ☐

- CUSTOMER'S RIGHTS**
1. CUSTOMER WANTS REPLACED PARTS IF NOT RETURNABLE UNDER WARRANTY, YES ☐ NO ☐
 2. DO YOU WANT A WRITTEN ESTIMATE BEFORE IT EXCEEDS \$50. YES ☐ NO ☐
 3. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN 15% OF THE COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT.
 4. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES ☐ NO ☐

WARRANTY INFORMATION

ON BEHALF OF SERVICE DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE AND THE CUSTOMER KNOWS AND UNDERSTANDS THE INFORMATION. I HAVE EXPLAINED TO THE CUSTOMER THE SCOPE AND LIMITS OF THE WARRANTY. I HAVE PROVIDED THE CUSTOMER WITH A WRITTEN ESTIMATE OF THE COST OF THE REPAIRS. I HAVE PROVIDED THE CUSTOMER WITH A WRITTEN ESTIMATE OF THE COST OF THE REPAIRS. I HAVE PROVIDED THE CUSTOMER WITH A WRITTEN ESTIMATE OF THE COST OF THE REPAIRS.

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INSTRUCTIONS ON WORK TO BE DONE										PG 1 OF 1			
10K SERVICE										TECH	OPERATION	HRS	
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										RC	NET	CND	AUTH

**RD 22386*-1 *TAG 0427* LIC: MD

MR 94 **VIN: 2FALP74W7 RX126232*

FORD CROWN VIC

LX 4DR SDN

LICENSE: MD 1 DK RED/MAR CAR

MFO CODE: 27H410 SVC DLR: 209001 SLM: 912

STOCK NUMBER: 000R0398

IN-SVC: 022893 SOLD: 022893 PROD: 113093

ODOMETER: LABT: 3073 CURRENT: 9870

AVG PER DAY: 44 PER MONTH: 1320

EDGEWATER MD

HOME: [REDACTED]

WORK: [REDACTED]

DIST CODE: 1FA

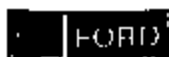
WARNING: POSSIBLE RECHECK 06/23/95

EXTENDED SVC PLAN: TYPE: EXTRA NUMBER: 1A DEDUCTIBLE: 50.00

IN FORCE: Y MONTHS: 48 MILEAGE: 75000 EXPIRES: 022899

09/06/95 07148129

UNPROMISED DATE: 09/06/95 TIME: 1400 ***



LOCAL
224-2100

BALTO
841-8800

WASHINGTON
281-8220

EASTERN SHORE
382-1415

3540 Riva Rd.

TO OUR EARLY MORNING OR LATE EVENING SERVICE CUSTOMERS

1. WRITE YOUR ORDER ON THIS ENVELOPE.
2. LOCK YOUR CAR AND PARK IT IN THE ASSIGNED AREA.
DO NOT LEAVE CAR IN DRIVEWAY.
3. PLACE YOUR KEYS IN THIS ENVELOPE.
4. BE SURE TO LEAVE A PHONE NO. WHERE YOU CAN BE REACHED.
5. DROP ENVELOPE IN MAIL SLOT IN SERVICE ENTRANCE DOOR.

T-427

NAME: _____

ADDRESS: _____

CITY: _____

Home Phone: _____

Business Phone: _____

What time will you call for your car? _____ a.m./p.m.

Year: _____

Make & Model: _____

Color: _____

USE THIS HANDY CHECK LIST

- | | | | |
|---|---|--|---|
| ☒ OIL SERV. | ☐ REPACK FT. WHEEL BEAR. | ☐ ADJUST PARKING BK. | ☐ OIL LEAKS (FR) |
| ☐ LUBRICATION SERVICE | ☐ TUNE UP | ☐ INSPECT BRAKES | ☐ ADJUST CLUTCH |
| ☐ CHANGE ENGINE OIL | ☐ ALIGN FRONT WHEELS | ☐ WASH. WAX. & POLISH | ☐ UNDERCOAT |
| ☐ CHANGE TRANS. OIL | ☐ BALANCE TIRES | ☐ ARI HEADLIGHTS | ☐ BODY REPAIR |
| ☐ CHANGE DIFF. OIL | ☐ ADJUST BRAKES | ☐ OIL LEAKS (RT) | ☐ ESTIMATE |

Other Work (Details): _____

CUSTOMER'S RIGHTS

1. Customer wants replaced parts if not returnable under warranty. YES ____ NO ____.
2. Do you want written estimate when it exceeds \$50. YES ____ NO ____ (P.G. COUNTY \$25.00)
3. Customer agrees that he may be charged not more than 10% of the cost of the written estimate without his consent.
4. Customer consent for additional repairs YES ____ NO ____.

I hereby authorize the above repair work to be done along with the necessary material, and hereby grant you under your employee's permission to operate the vehicle herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. As express mechanic's lien is hereby acknowledged on above vehicle to secure the amount of repairs thereto. Dealer not responsible for unavailability of parts or delays in parts shipments beyond dealer's control nor for loss or damage to vehicle or articles left in vehicle in case of fire, theft or any other cause beyond our control.

PLEASE SIGN X _____

YOU WILL BE CALLED AND GIVEN AN ESTIMATE BEFORE ANY WORK IS PERFORMED, UNLESS OTHERWISE ARRANGED. I understand, because of the EARLY MID SERVICE, I am unable to receive a copy of the estimated cost.

Time of call ____ A.M. P.M. Okay Yes ☐ No ☐

Do you want old parts? Yes ☐ No ☐

226-096-0027

Representative's name

==>

VEHICLE ID: 2FRX126232 (WHYP888888) Vin: 2PALP74W7RX126232 Div: 1 Status: 800

Financial Data-			
Orig Totl Inv:	21982.00	A-Plan Price:	21074.00
Curr Totl Inv:	21982.00	Total Adj:	.00
Base Vehicle:	18916.00	Base Adj:	.00
Options:	2026.00	Option Adj:	.00
Base Holdback:	621.00	Base Hb Adj:	.00
Optn Holdback:	69.00	Option Hb Adj:	.00
Misc Charges:	.50	Gas Amt:	14.50
Finance Chrgs:	180.00	Sched-B Amt:	575.00
FDAP/LMDA:	270.00	Mktng Contrib:	220.00
Financing Data-			
Finance Source:	0000001	O-Warr Start:	022895
Orig Int St-Sw:	N	Co Tag Number:	
Ret Draft Ind:		Pre-del Date:	
Floor Pln Date:	122593	Prdlvry S.Code:	
Advt Comm Code:	A	Lease Code:	
Upfront PP Ind:		Invoice In-Proc:	080296
		Release Date:	113093
		Transit Time:	11
		Rls Plus Trans:	121193
		Ramp Code:	5M
		Method Shipped:	5
		Memo Cons Loc:	

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

OGDB412

NVNP510

NAVIS Vehicle Inquiry

09/01/98 13:24:27

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VEHICLE ID: 2FRX126232 (NWYPBBBBBB) Vin: 2FALP74W7RX126232 Div: 1 Status: 800
Vehicle Line: CFB Convy Deliv: 120893 Orig P-Lvl: 410 Selling Dlr: 27H418
Order Recpt: 102693 ShipTo Stat: Curr P-Lvl: 410 Sale Date: 022895
Orig Sched: 112293 Rls-To Stat: MD Order Dlr: 27418 Demo Date:
Inv Prep: 112393 Orig Int St: 120193 Orig Rls Dlr: 27418 Deliv Type: 0
Prod Date: 113093 Curr Int St: 120193 Rls Dlr P&A: 00089 Sales Prd: 095023
Rls Date: 113093 Dlxfin Ext: 122593 Warr Start: 022895 Cancel Sl:
Memo Consgn: P&C Ext: 122593 Warrs-Ind: Sale Status: G
Orig Pltbus: 113093 Advert Ext: 122593 -Date- -Dealer-
Curr Pltbus: 113093 Slapan SS#: 6199 Shipped: 120293
T/Name: 1 Curr Stock: 113093 27H418
Addr: State: MD 1st-Prior:
City: EDGEWATER N/A-Ropt: 030195 2nd-Prior:
Zip: Warr-Ins-Ind: 3rd-Prior:
V.O.: 1 2 3 4 5 6 7 8
12345234567890123456789012345678901234567890123456789012345678901234
P74RXS 4L L J2 22L1216 OK D P3 J37 Q7 3 L6L 7 1S14AA 27H418 4 EG
8 9 0 1 2 3 4 5 6
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5H3H 3 W2FAL7 3 E 114A 9WP S
F1-Help F3-Exit F4-Primary Menu F5-Financial Screen F9-Screen #3

OGDB412

NVNP530

NAVIS Inquiry Screen #3

09/01/98 13:24:33

==>

VEHICLE ID: 2FRX126232 (WWYP888888) Vin: 2FALP74W7RX126232 Div: 1 Status: 800

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

Selling FIN:
Sold-To Fin:

Distr Status: P
Last NAVIS St: 030195
Distr Stat Dt: 120893
Last Activity: 080296
Serialized Dte: 102993
Scheduled Dte: 112293
Mexico Status:

Component Data - - - - -

Dr Post/Calib: LDF Tire Brand: A4
Emis Cntl Lbl: KLA REC:
Engine Tag Cd: EG806AA
Engine Serial: W
Driver Airbag: 1PA3316G10148
Passngr Airbag: 633121406 Axla: GY

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

OGDB412

CSCN140

VEHICLE DATA

08/31/98 12:58:44

==>

ENTER VIN ==> 2FALP74W7RX126232

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

OWNER NAME :

STREET ADDR :

CITY : EDGEWATER

N/A YY-MM-DD 95-12-04

ST/PRV: MD CTRY:

ZIP/POSTAL CODE: [REDACTED] N/A SOURCE: M

MODEL YEAR : 94 PLANT: X

SALE YY-MM-DD 95-02-28

BODY STYLE DESC: 4 DOOR SEDAN LX

PRODUCTION YY-MM-DD 93-11-30

VEHICLE DESC : 1994 CROWN VICTORIA

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	1	27	C	418	23	27
FACING	1	27	C	418		
RESPONSIBLE	1	27	C	418		

CA EMISSION : ENGINE TAG CODE : EG806AA

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

OGDB412

==>

ENTER CAMPAIGN NUMBER==> 94B58 VIN==> 2FALP74W7RX126232 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: OWNER GUIDE BODY STYLE: 4 DOOR SEDAN LX
NEW STATUS CODE: _ CAMP DIV : 6
REPAIR INFORMATION: TYPE CODE: _ SUPP CODE :
REPAIR DATE: _ DEALER P/A: _ KIT CODE : AA
MICRO REF: _ CLAIM NUM: _ OASIS DATE :
DELETE REASON: _ VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: NEW: _ _ _ IND: MATCH CODE:
CURRENT: 1 27 418 ASSIGNED: 95-12-05 SOURCE: PX EXTRACT DATE: 94-11-21
***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC
F FORCED COMPLETION 96-03-04 B 96-03-04 AUTOC OL
M RELEASED FOR MAILING 94-11-29
H AWAITING MAILING 94-11-09

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

OGDB412

==>

ENTER CAMPAIGN NBR ==> 94B58 VIN ==> 2FALP74W7RX126232
DEFECT : OWNER GUIDE BODY STYLE DESC: 4 DOOR SEDAN LX
RESP DEALER : 127418 BEGINNING MAILED DATE: 94-12-23 YY-MM-DD
RELEASE DESC : NEW ISSUE TOTAL ENDING MAILED DATE : 94-12-23 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 : ST/PRV:
CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N N-A EFF DATE: 00-00-00 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 OGDB412

==>

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 2FALP74W7RX126232 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: PASS AIR BAG BODY STYLE: 4 DOOR SEDAN LX
NEW STATUS CODE: _____ CAMP DIV : 6
REPAIR INFORMATION: TYPE CODE: _____ SUPP CODE :
REPAIR DATE: _____ DEALER P/A: _____ KIT CODE : BV
MICRO REF: _____ CLAIM NUM: _____ OASIS DATE :
DELETE REASON: _____ VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: NEW: _____ IND: Y MATCH CODE:
CURRENT: 1 27 418 ASSIGNED: 96-11-24 SOURCE: NI EXTRACT DATE: 96-11-24
***** 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 97-02-10
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

OGDB412

==>

ENTER CAMPAIGN NBR ==> 96L12 VIN ==> 2FALP74W7RX126232
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DOOR SEDAN LX
RESP DEALER : 127418 BEGINNING MAILED DATE: 97-03-04 YY-MM-DD
RELEASE DESC : NY PART KIT CODE ENDING MAILED DATE : 97-03-12 YY-MM-DD
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS: WR
STREET ADDR1 :
ADDR2 : ST/PRV: MD
CITY : EDGEWATER CTRY:
ZIP/POSTAL CODE: N-A SOURCE: M N-A EFF DATE: 95-12-04 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
1048-LAST PAGE OGDB412

CSCN150

CAMPAIGN VEHICLE INFORMATION

08/31/98 12:59:18

==>

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 2FALP74W7RX126232 TYPE OF SEARCH: A
MODEL YEAR: DEFECT: 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)

*****END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES OGDB412

STANDARD CLAIMS LIST

Cutoff Date : 31 Jul 1988

Print Date : 31 Aug 1988

Print Time : 15.28

Distance Reported in: Miles

Currency Reported in: USD

Dates Reported in: DD-MMM-YY

Result ID : 13880188

Page : 2

Model Year : 1994

VEHICLE INFORMATION														REPAIR INFORMATION						
VIN	VEH LINE	MARKT	BODY	VER	DRIVE	PLANT	TRANS	ENG	PROD	WARR	SELLING	SELL	WCC	FULL PREFIX	PART BASE	NUMBER SUFFIX	CCC	CD	DIST (Miles)	
2FALP74W7RX128232	C/FB	C/F	C/FB	C/AI	C/B	AW	C/DK	C/VN	30-11-83	28-02-85	127418	USA 4	7522	DQ27	14828	D	C05	38	6,078	
AWB Claim Key: 10045059																				
Trx Code:		2		Labor Hrs:		0.2		Labor Cost (USD):		11.19		Material Cost (USD):		0.84		Total Cost (USD):		11.95		
Dr Cd-SubCd:		00089		Name: KOONS FORD OF ANNAPOLIS INC																
Customer Comments:		TURN SIGNALS AND A-C INOP SEE GUST NOTE:																		
Technician Comments:		FUSE MISSING FUSE - REPLACE-CHECK OPERATION OF AC & SIGNALS COULD NOT VERIFY:																		
2FALP74W7RX128232	C/FB	C/F	C/FB	C/AI	C/B	AW	C/DK	C/VN	30-11-83	28-02-85	127418	USA 0	7K11	F0VY	10848	AR	A05	33	7	
AWB Claim Key: 1005780																				
Trx Code:		1		Labor Hrs:		1.3		Labor Cost (USD):		66.29		Material Cost (USD):		155.57		Total Cost (USD):		221.86		
Dr Cd-SubCd:		00089		Name: KOONS FORD OF ANNAPOLIS INC																
Customer Comments:		SPEEDOMETER IN DASH DOES NOT READ OVER 30 MPH																		
Technician Comments:		LOOSE CONN. DIAG. REPL HEAD ASSY.																		
2FALP74W7RX128232	C/FB	C/F	C/FB	C/AI	C/B	AW	C/DK	C/VN	30-11-83	28-02-85	127418	USA 0	7502	F1VY	10348	B	C27	X1	37	
AWB Claim Key: 7513728																				
Trx Code:		B33		Labor Hrs:		1.8		Labor Cost (USD):		87.40		Material Cost (USD):		282.78		Total Cost (USD):		400.04		
Dr Cd-SubCd:		00089		Name: KOONS FORD OF ANNAPOLIS INC																
Customer Comments:		AMP LIGHT ON:																		
Technician Comments:		BATTERY & ALTERNATOR SHORTED ALTERNATOR - REMOVE AND INSTALL OR REPLACE:																		

Total Number of Repairs for Model Year 1994 = 3

END OF REPORT

Total Number of Repairs to this point = 3

CUSTOMIZED CLAIMS LIST

Cutoff Date : 31 Jul 1998

Print Date : 31 Aug 1998
Print Time : 15.29

Distance Reported In: Miles
Currency Reported In: USD

Dates Reported In: DD-MM-YY

Result ID : 13680169
Page : 2

Model Year : 1994

CLAIM_KEY: DOCUMENT_NUM: TRANS_REF_NUM:

160876C	090454	UPN15481
751372B	01037151	88CLADU01
10048069	01818923	HFBLGAP01

Total Number of Repairs for Model Year 1994 = 3

END OF REPORT

Total Number of Repairs to this point = 3

ENR2-025 44513

STK 000R0398 VIN 2FALP74W7RX126232 STATUS: NEWCARSL 02/26/95 17124
 ORD# *001216 * CO02218200L SPEC 114A
 94 FORD CROWN VIC LX 4DR SDN ODOMETER 37
 COL ELECTRIC RED CC METALLIC
 TRIM MOCHA CLOTH SPLIT BENCH
 LIST 25660.00 11012089301 HELD BY WITTIG
 MODEL NUMBER P74

SIMPSON 2-27-95.

STD*	1994 CROWN VC LX 4-DOOR	20715.00
114A	PREFERRED EQUIPMENT PKG. 114A	4370.00
12H	.FRONT CARPETED FLOOR MATS	
12R	.REAR CARPETED FLOOR MATS	
47J	.ILLUMINATED ENTRY SYSTEM	
524	.LEATHER-WRAP STEERING WHEEL	
943	.LIGHT/DECOR GROUP	
68A	.GROUP 1:	
	.REAR WINDOW DEFROSTER	
	.POWER LOCK GROUP	
	.SPEED CONTROL	
65C	.GROUP 2:	
	.POWER RADIO ANTENNA	
67A	.GROUP 3:	
	.CORNERING LAMPS	
	.CAST ALUMINUM WHEELS	
65D	.GROUP 4:	
	.DUAL 6-WAY POWER SEATS	
	.REMOTE KEYLESS ENTRY	
	.REAR AIR SUSPENSION	
	.ELECTRONIC GROUP	
	.AUTOMATIC CLIMATE CONTROL A/C	
	.HIGH-LEVEL AUDIO SYSTEM	
	.ANTI-LOCK BRAKES/TRACION CTL	
	.AUTO DIM ELECTRONIC MIRROR	
T37	.P215/70RX15 BSW TIRES	
99H	.4.6L OHC SEFI V8 ENGINE	
44P	.ELECTRONIC AUTO O/D TRANS	
153	FRONT LICENSE PLATE BRACKET	
	DESTINATION & DELIVERY	575.00
DSC*	***SPECIAL ADDED DISCOUNT**	-935.00
	SPECIAL-VALUE DISCOUNT	-1140.00
	10 U.S. GAL GAS FACTORY	
	PRICED DORA	
	OPTIONAL MAGNETIC/ANTI-LOCKING	

FORD

Koons
of Annapolis

FORD

LOCAL
224-2100BALTO
841-6580WASHINGTON
281-8222

CUSTOMER INFORMATION

DATE: 2/28/95

Edgewater Md.

CITY

CITY

AA

BUYER'S AGE

48 0

DEALER'S NAME

DEALER'S STREET

DEALER'S PHONE

LOCAL SECURITY

ORDER INFORMATION

1994

Ford

Crown Vic

LX

2FALP74U17RX136836

11 NEW

12 USED

R0398

13 USED

14 USED

15 USED

16 USED

VEHICLE INFORMATION

BASE PRICE	\$	TOTAL BROUGHT FORWARD	\$19613.00
Freight			
Accessories/Equipment			
Dep 114A			
14.6 L V8 engine			
ABS			
speed control			
conventional spare			
DEALER PROCESSING CHARGE			
Total Forwarded \$		(NOT REQUIRED BY LAW)	
DELIVERED PRICE OF CAR			\$19613.00
TITLING TAX - 5% of Delivered Price			980.65
Titling Service	Temp. Plates	New License Plates \$	TOTAL 130.00
Transfer Service	Additional Weight \$		TOTAL 5.00
Used Car Inspection Fee - Extended Warranty			
TOTAL CASH DELIVERED PRICE OF CAR INCLUDING REGISTRATION FEES			\$20728.65

The information you see on the window form for this vehicle is part of this contract. Information on the window form overrides any contrary provisions in the contract of sale.
CUSTOMER AGREES TO PAY DIFFERENCE IF HIGHER.

ALLOW. FOR TRADE-IN \$

DEPOSIT WORDER

DEPOSIT WORDER

LESS BAL. OWING TO \$

NET EQUITY

UNPAID BAL. DUE ON DELIVERY \$

TRADE INFORMATION

YEAR	MAKE	MODEL	STOCK #	DEALER	EXTENSION
ACCOUNT #	PAYOFF DATE GOOD UNTIL	BUYER	MAKE	ZIP	
SR. CC.	Liiso	Direct	764-03-17	OFF. DATE	
PHONE					

The front and back of this Order comprise the entire agreement affecting this purchase and no other agreement or understanding of any nature concerning same has been made or entered into, or will be recognized.

I have read the matter printed on the back hereof and agree to it as a part of this order the same as if it were printed above my signature. I certify that I am 18 years of age, or older, and hereby acknowledge receipt of a copy of this order.

THIS ORDER IS NOT VALID UNLESS SIGNED AND ACCEPTED BY DEALER OR HIS AUTHORIZED REPRESENTATIVE

APPROVED: _____
DEALER OR AUTHORIZED REPRESENTATIVE

E982-025 44533

94X126232

1994 CROWN VICTORIA

4 DOOR SEDAN LX

02/28/95 17124132

4.6L SOHC (MODULAR) 418GR00A AODE 4 SPEED OD

AXLE CODE : 3

*OPEN RECALLS

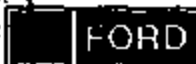
NO RECALLS FOR VEHICLE

*WARRANTY START DATE 00/00/00 BUILD DATE 11/30/93 START MILEAGE

*EXTENDED SERVICE PLAN

NO ESP INFORMATION AVAILABLE

FOR MORE INFO <RTN>, M. MENU OR 99. BYE



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-0580, WASHINGTON 261-8220
DIRECT LINE 286-3087

P & A CODE 00089

DATE AND RELEASE AT TIME OF VEHICLE RECEIPT	
DATE	TIME
DATE AND RELEASE AT TIME OF VEHICLE RELEASE	
DATE	TIME

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW ☒

EDGEWATER
SARNE ARUNDEL
DAYS: BEGIN: 090695 DONE: 090695 INVC: 022895 SOLD: 022895 PROD: 113093
ADV: 287 DC: 1FA
NAME: [REDACTED]
WORK: [REDACTED]

TAG: 0427 C RO: C22386-1
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 09/06/95 18:15:16
LIC: MD 1 STK#1000R0398
ODOMETER IN: 9870 TX: 1

10K SERVICE	1 TECH 707	8	11.60		
COMPLETED SERVICE			REED, DERICH L.		
	OP-10K				
VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE	EXTENDED
FND FL 820	FILTER		1	8.63	8.63
FNC XO 5H30 QSP	MOTOR		5	3.31	16.55
PARTS AMOUNT					25.18
LAB AMOUNT					11.60
SERVICE SPECIAL ADJUST					11.63
LINE TOTAL - DEPT D					24.95

PARTS	25.18
SUPPLIES	2.32
LAB-MECHANICAL	11.60
SERVICE SPECIAL ADJUSTMENT	11.63
SUB-TOTAL	27.27
TAX	.78
TOTAL-CHARGES	28.05
VISA	004014
	28.05

LAB RATE: 34.00

VISA /// MASTERCARD ///

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. ORESHAM



2545 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8850, WASHINGTON 261-8220
DIRECT LINE 308-3087

P & A CODE 00089

[illegible]

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 5:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒

EDgewater
Anne Arundel

ADV: 287 DC: 1FA

HOMEWORK

M13 [REDACTED]

TAG: 0427 C P RO: C22386-
 2FALP74W7RX126232 DK RED/MA
 94 FORD CROWN VIC LX 4DR SDN

INVOICED AT: 09/06/95 09:52:09
LIC: MD 1 STKM:000R0396

INSVC: 022698 SOLD: 022698 PROD: 113092

ODOMETER IN 19870

TX# 1

LN 10K SERVICE
#31 COMPLETED SERVICE

TECH 707

5 11.60

REED, DERICH L.

VEN PART NUMBER
FMC FL 820
FMC XO 0N30 GSP
PARTS AMOUNT
LAB AMOUNT
SERVICE SPEC
LINE TOTAL

DESCRIPTION NOTE
FILTER
MOTOR D
of Annapolis
ADJUST
DEPT. D

QTY	PRICE	EXTENDED
1	8.63	8.63
3	3.31	16.55
		25.18
		11.60
		11.63
		24.95

PARTS	25.18
SUPPLIES	2.32
LAB-MECHANICAL	11.60
SERVICE SPECIAL ADJUSTMENT	11.83
SUB-TOTAL	27.27
TAX	.78
TOTAL-CHARGES	28.05
CASH DUE	28.05

LAB RATE: 64.00

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. ORESHAN

MC

PAGE 1 OF 2

[illegible]

LOCAL
224-2100BALTO
841-8880WASHINGTON
251-8220EASTERN SHORE
352-1415

2540 Riva Rd.

TO OUR EARLY MORNING OR LATE EVENING SERVICE CUSTOMERS

1. WRITE YOUR ORDER ON THIS ENVELOPE.
2. LOCK YOUR CAR AND PARK IT IN THE ASSIGNED AREA.
DO NOT LEAVE CAR IN DRIVEWAY.
3. PLACE YOUR KEYS IN THIS ENVELOPE.
4. BE SURE TO LEAVE A PHONE NO. WHERE YOU CAN BE REACHED.
5. DROP ENVELOPE IN MAIL SLOT IN SERVICE ENTRANCE DOOR.

T-427

NAME:

LIC. PLATE:

ADDRESS:

CITY:

EDGEWATER

ZIP:

9870

Home Phone:

Business Phone:

What time will you call for your car?

3:30

a.m./p.m.

Year:

94

Make & Model:

Crown Vic

Color:

USE THIS HANDY CHECK LIST

- ☒ OIL SERV.
☐ LUBRICATION SERVICE
☐ CHANGE ENGINE OIL
☐ CHANGE TRANS. OIL
☐ CHANGE DIFF. OIL

- ☐ REPACK FT. WHEEL BEAR.
☐ TUNE ENGINE
☐ ALIGN FRONT WHEELS
☐ BALANCE TIRES
☐ ADJUST BRAKES

- ☐ ADJUST PARKING BR.
☐ INSPECT SPARKS
☐ SERP. BELT/EXHAUST SYS.
☐ A/C RECHARGE/PT
☐ OIL LEAKS (PT)

- ☐ OIL LEAKS (PT)
☐ ADJUST CLUTCH
☐ UNDERCOAT
☐ BODY REPAIR
☐ ESTIMATE

Other Work (Details)

CUSTOMER'S RIGHTS

1. Customer wants replaced parts if not returnable under warranty, YES ☐ NO ☐.
2. Do you want written estimate since it exceeds \$80, YES ☐ NO ☐. (P.C. COUNTY \$25.00)
3. Customer agrees that he may be charged not more than 10% of the cost of the written estimate without his consent.
4. Customer consent for additional repairs YES ☐ NO ☐.

I hereby authorize the above repair work to be done along with the necessary material, and hereby grant you and/or your employees permission to operate the vehicle herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above vehicle to secure the amount of repairs thereto. Dealer not responsible for unavailability of parts or delays in parts shipments beyond dealer's control nor for any other cause beyond our control.

PLEASE SIGN

YOU WILL BE CALLED AND GIVEN AN ESTIMATE BEFORE ANY WORK IS PERFORMED, UNLESS OTHERWISE AFFIANDED. I understand, because of the EARLY BIRD SERVICE, I am unable to receive a copy of the estimated cost.

Time of call : A.M. P.M. Okay Yes ☐ No ☐Do you want old parts? Yes ☐ No ☐

DEALER COPY

Return to Service

[illegible]

EDGEWATER

ANNE ARUNDEL

UNITED STATES

UNITED STATES

(410) 111-1111

SVC & CUST: 907 WAR: 684 POL:

456 CD 2744-2 11-22-91 5073

25ALP7AWTRX126282 MD 1

REL DATE 02/28/95 MILE

50 1997 SERV 10/12/95

94 9090

CROWN VIC LX

4DR SW

DK 950/-60.72-0250 DATE 02/09/95

RD W18109 06/21/95 5073 648 PTS= .75 POL= .00 TOT= 11.95

PREFERRED TREATMENT

LN22 TECH1-791 .20

OPR-CODE 14526A

FC 39 FP D97714526D

TURN SIGNALS AND A/C INOP SEE CUS

NOTE

FUSE MISSING

FUSE - REPLACE-CHECK OPERATION OF

AC & SIGNALS COULD NOT VERIFY

RD C10129 06/21/95 5073 648 PTS= 22.02 POL= .00 TOT= 42.17

PREFERRED TREATMENT

LN31 TECH1-791 .40

OPR-CODE 5K

94 5K SVC

COMPLETED SERVICE

RD C12865 03/09/95 93 946 PTS= 165.38 POL= .00 TOT= 665.20

PREFERRED TREATMENT

LN51 TECH1-134 3.00

OPR-CODE INSTALL

AUTH DW

INSTALL FORD 400 ALARM SYSTEM

INSTALL FORD 400 ALARM SYSTEM

LN52 TECH1-500

OPR-CODE INSTALL

AUTH DW

INSTALL AUTO ARMOR PROT. PKG.

INSTALL AUTO ARMOR PROT. PKG.

RD W10371 01/30/95 37 287 PTS= 362.63 POL= .00 TOT= 460.03

LN51 TECH1-889 .70

OPR-CODE 10346A

FC X1 FP F1UY10346B

AMP LIGHT ON

BATTERY & ALTERNATOR SHORTED

ALTERNATOR - REMOVE AND INSTALL D

R REPLACE

LN51-1 TECH1-889 .30

OPR-CODE 10200A

FC X1 FP F1UY10346B

ALTERNATOR CIRCUITS (USING VOLTMETER) - TEST

LN51-2 TECH1-889 .30

OPR-CODE 10654B

FC X1 FP F1UY10346B

REPLACE BATTERY

LN51-3 TECH1-889 .50

OPR-CODE 14200A

FC X1 FP F1UY10346B

WIRING ASSEMBLY - REPAIR

RD W09454 03/15/95 7 306 PTS= 155.57 POL= .00 TOT= 245.02

LN51 TECH1-552 1.10

OPR-CODE 10949A

FC 23 FP 10949

SPEEDOMETER IN DASH DOES NOT READ

FORD

Koons

of Annapolis

FORD

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-0650, WASHINGTON 281-8220
DIRECT LINE 268-3087

P & A CODE 00089

INVOICE COVER	
NAME	
ADDRESS	
CITY	
STATE	
ZIP	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	
MILEAGE	
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	
MILEAGE	

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 5:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT
OF THE PARTS AND LABOR
LISTED BELOW

W. M. Surpin

EDGEWATER
ANNE ARUNDEL

MD

TAG# 0704 CWP RO# W10102

27AL174W7RX126232 DK RED/MAR

94 FORD CROWN VIC LX 4DR SDN

INVOICED AT# 06/23/95 14:17:50

LIC# MD 1 STK# 000R0370

DATE# 062195 DOME# 062395 INSV# 022095 SOLD# 022095 PROD# 113090

ADV# 648 DC# 1FA

27H410

HOME#

ODOMETER IN# 5073

TX# 1

WORK#

95174

LN TURN SIGNALS AND A/C INOP SEE CUS# TECH 791 LAB HRS .2 11.19

32 T NOTE

SANFORD, ROB

FUSE MISSING

1526A

FC 59

FUSE - REPLACE CHECK OPERATION OF

AC & SIGNALS COULD NOT VERIFY

VEN PART NUMBER

ISSUE#

NOTE

QTY PRICE & EXTENDED

FMC#D722

14526 D

FACE

of Annapolis

2 .27 .54

PARTS COUNT

2 .76

PARTS AMOUNT

LAB AMOUNT

11.19

LINE TOTAL - DEPT D

11.95

PARTS

.76

LAB MECHANICAL

11.19

TOTAL CHARGES

11.95

TAC WARRANTY

11.95

LAB RATE# 64.00

PREFERRED TREATMENT

ATTENTION

CUST-PAY MUST BE PRINTED ALSO

KAM
6/23

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. MENNELL

MD

PAGE 1 OF 1

FORD

Koo's
of Annapolis

ISUZU

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8660, WASHINGTON 261-8220
DIRECT LINE 298-3087

P & A CODE 00089

PROGRAM CODE	
DATE	
TIME	
TECHNICIAN	
VEHICLE	
MAKE	
MODEL	
YEAR	
ENGINE	
TRANSMISSION	
DRIVE	
WARRANTY	
WORK DONE	
REMARKS	

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
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OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:00 AM TO 7:00 PM
SAT: 9:00 AM TO 1:00 PM

I HEREBY ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABORS
LISTED BELOW. X

1A01 091232 H FORD
2540 RIVA ROAD ANNAPOLIS MD 21401
FORD CROWN VIC LX 4DR SDN
INVOICED DATE 09/21/94
STK# 1000000000

1A01 091232 H FORD
2540 RIVA ROAD ANNAPOLIS MD 21401
FORD CROWN VIC LX 4DR SDN
INVOICED DATE 09/21/94
STK# 1000000000

1A01 091232 H FORD
2540 RIVA ROAD ANNAPOLIS MD 21401
FORD CROWN VIC LX 4DR SDN
INVOICED DATE 09/21/94
STK# 1000000000

H 3/28

[illegible]



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8550, WASHINGTON 201-3220
DIRECT LINE 208-3067

P & A CODE 00069

PROBATION CODES	
REASON 1	
REASON 2	
REASON 3	
DATE AND RELEASE AT TIME OF VEHICLE RECEIPT	
DATE	RELEASE REFERENCE
NO	YES
DATE AND RELEASE AT TIME OF VEHICLE RELEASE	
DATE	RELEASE REFERENCE
NO	YES

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICKUP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW X

EDGEWATER

ANNE ARUNDEL

DATES: BEGIN: 030995

DONE: 031095

ADV: 946 DC: 1FA

HOME: [REDACTED]

MD [REDACTED]

TAG: 3909 C P RO: C12545-3
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 03/10/95 13:20:00
LIC: MD STK#1000R0398 1300
SOLD: 022895 PROD: 113093
27H418
TX: 1
ODOMETER IN: 93

LN	VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE	EXTENDED
51	FMC#F3AZ 19A361 C	KIT ELECT	OP-INSTALL	1	165.38	165.38
	PARTS AMOUNT					165.38
	LAB AMOUNT					166.00
	LINE TOTAL - DEPT D					371.38

LN	DESCRIPTION	NOTE	PRICE	EXTENDED
52	INSTALL AUTO ARMOR PROT. PKG. TECH 500	OP-INSTALL	484.55	484.55
	LAB AMOUNT			484.55
	LINE TOTAL - DEPT D			484.55

PARTS	165.38
LAB-MECHANICAL	670.55
SUB-TOTAL	835.93
TAX	9.27
TOTAL-CHARGES	845.20
CHECK RECEIVED	845.20

LAB RATE: 62.00
PREFERRED TREATMENT

DW

PAGE 1 OF 3

*Paid Visa
3/10/95 DB*



2840 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-0600, WASHINGTON 201-8220
DIRECT LINE 206-3007

P & A CODE 00089

Customer Name			
Address			
City			
State			
Zip			
Date and Mileage at Time of Vehicle Receipt			
Mileage at Time of Vehicle Receipt			
Mileage at Time of Vehicle Release			
Mileage at Time of Vehicle Release			

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 5:00 PM

CASHER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW X

000R0398

TAG: 9637 I P RD: 184907-9
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 12/10/93 10:10:07
PRODI 113093
STK#: 000R0398 5020

DATES: BEGIN: 120893 DONE: 121093
ADV: 765- DC: 1FA

ODOMETER IN: 4

TX: 1

LN PDI
51 PDI
PDI

TECH 749 LAB HRS 1.7 68.65
SELBY, JOSEPH
OP-PDI

LAB AMOUNT
LINE TOTAL

- DEPT

0
68.65
68.65



MECHANICAL
CHARGES
INTERNAL

68.65
68.65
68.65

LAB RATE: 54.00
INTERNAL

MS

PAGE 1 OF 1

1. CUSTOMER WANTS REPLACED PARTS IF NOT RETURNABLE: YES ☐ NO ☐ YEAR WARRANTY: _____

2. DO YOU WANT A WRITTEN ESTIMATE SINCE IT EXCEEDS \$: \$_____

3. NO ☐ YES ☐

4. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN 10% OF THE COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT.

5. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES ☐ NO ☐

[illegible]

CONTROL TASKS ON WORK TO BE DONE				FD-1 OF 1			
1. [REDACTED]				TECH	OPERATION		HRS
2. [REDACTED]				OLH	FLG	FAILED PART	
3. [REDACTED]				RC	NET	CND	AUTH
4. [REDACTED]				TECH	OPERATION		HRS
5. [REDACTED]				OLH	FLG	FAILED PART	
6. [REDACTED]				RC	NET	CND	AUTH
7. [REDACTED]				TECH	OPERATION		HRS
8. [REDACTED]				OLH	FLG	FAILED PART	
9. [REDACTED]				RC	NET	CND	AUTH
10. [REDACTED]				TECH	OPERATION		HRS
11. [REDACTED]				OLH	FLG	FAILED PART	
12. [REDACTED]				RC	NET	CND	AUTH
13. [REDACTED]				TECH	OPERATION		HRS
14. [REDACTED]				OLH	FLG	FAILED PART	
15. [REDACTED]				RC	NET	CND	AUTH

```

**RO 84907**--9 *TAG 9A37* 1 IC1
000R0398
SVC ADL: 765 BROOK SHOLTS
94 **VIN: 2FALP74W7 RX126232**
FORD CROWN VIC
LX 4DR SDN
LICENSE: DK RED/MAR CAR
SVC DLR: 209001
STOCK NUMBER: 000R0398 INV ACCT: 5020
PROD: 113093
CURRENT: 4

```

DIST CODE: IFA

255 NOTE: INTERNAL
 MODEL# P74
 TAG 9637 ***RD 84907** SVC ADVI 745 VIN: 2FALP74WZ RX126232
 ****PROMISED DATE: 12/08/93 TIME: 1600 ****

FORD



FORD

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8560, WASHINGTON 201-8220
DIRECT LINE 296-9087

P & A CODE 00089

PROFORMA CODES	
REPORT 1	
REPORT 2	
REPORT 3	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (PER VEHICLE)
DATE	MILEAGE (PER VEHICLE)
DATE	MILEAGE (PER VEHICLE)
DATE	MILEAGE (PER VEHICLE)

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 8:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒ X

000R0398

TAG: 0796 W P RD: W10371-9
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 02/02/95 11:17:52
STK#: 000R0398 1300
PROD: 113093

DATE: BEGIN: 013095 DONE: 020195
ADV: 287 DC: 1FA

ODOMETER IN: 37

TX: 1

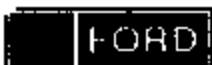
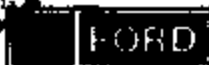
95033

LN	AMP LIGHT ON	TECH 889 LAB HRS	.7	37.88
51	BATTERY & ALTERNATOR SHORTED	VOLTA, CARLO		
	ALTERNATOR - REMOVE AND INSTALL OF OP-10346A	FC-X1		
	R REPLACE			
LN	ALTERNATOR CIRCUITS (UG1	TECH 889 LAB HRS	.3	16.23
51-1	TER) - TEST	VOLTA, CARLO		
		FC-X1		
LN	REPLACE BATTERY	TECH 889 LAB HRS	.3	16.23
51-2		VOLTA, CARLO		
		FC-X1		
LN	WIRING ASSEMBLY - REPAIR	OP-10654B		
51-3		TECH 889 LAB HRS	.5	27.06
		VOLTA, CARLO		
		FC-X1		
		OP-14200A		
		FC-X1		

VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE	EXTENDED
FMC#E9AZ 14524 A	*WIR ASY-F		1	5.61	5.61
FMC#F1VY 10346 B	ALT ASY-		1	152.75	152.75
FMC#F0DZ 10316 A	REGULATOR		1	37.50	37.50
FMC#F1DZ 10347 A	HOLDER &		1	3.78	3.78
FMC BXT 65 650	BATTERY A		1S	83.14	83.14
	PARTS COUNT		5		
PARTS AMOUNT					362.63
LAB AMOUNT					77.40
LINE TOTAL - DEPT D					440.03

MG

PAGE 1 OF 2



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8880, WASHINGTON 261-8220
DIRECT LINE 288-9087

P & A CODE 00089

DATE AND VOLUME AT TIME OF THIS RECEIPT	
DATE	VOLUME
DATE AND VOLUME AT TIME OF VEHICLE DELIVERY	
DATE	VOLUME

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 8:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 8:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW ☒

000R0398

TAQ: 0796 W P RO: W10371-9
2FALP74W7RX126232 DK RED/MA
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 02/02/95 11:17:52

PARTS	362.63
LAB-MECHANICAL	97.40
TOTAL-CHARGES	460.03
FAC WARRANTY	460.03

LAB RATE: 62.00

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. OREHAM
MO

PAGE 2 OF 2



FORD

Koons Ford of Annapolis

FORD

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-6550, WASHINGTON 201-8220
DIRECT LINE 206-3087

P & A CODE 00069

DATE AND MILEAGE AT TIME OF VEHICLE PURCHASE	
DATE	MILEAGE
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW

EDGEWATER

MD

TAG: 0704 C W P RD: C10169-

2FALP74W7RX126232 DK RED/MAR

94 FORD CROWN VIC LX 4DR SDN

INVOICED AT: 06/23/95 14:16:15

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. PENNELL

Koons Ford of Annapolis

PAGE 2 OF 3

2002-025 44666



P & A CODE 00069

PERIODIC REPORT									
REPORTING AGENCY									
PERIOD 1									
PERIOD 2									
PERIOD 3									
DATE AND RELEASE AT TIME OF VEHICLE PURCHASE									
DATE		ADDRESS		CITY		STATE		ZIP	
DATE AND RELEASE AT TIME OF VEHICLE PURCHASE									
DATE		ADDRESS		CITY		STATE		ZIP	

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CABRIER AND CUSTOMER PICK-UP
7:30 AM TO 7:30 PM
SAT. 8:00 AM TO 1:00 PM

**I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW**

WORK

SANFORD, BOB

34.55

WARRANTY MUST BE PRINTED ALSO

PAGE 1 OF 3

FORD



FORD

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8850, WASHINGTON 281-8220
DIRECT LINE 206-3067

P & A CODE 00089

PREVIOUS DAMAGE	
REPORT 1	
REPORT 2	
REPORT 3	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (NO DECIMALS)
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE (NO DECIMALS)

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
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OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW X

TAG# 0704 C W RO# C18189-6
 2FALP74W7RX126232 DK RED/MAR
 94 FORD CROWN VIC LX 4DR SDN
 INVOICED AT: 06/23/95 19:03:34
 EDGEWATER MD

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. PENNELL



PAGE 2 OF 3

E982-825 44558

FORD



FORD

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 941-0660, WASHINGTON 281-8220
DIRECT LINE 288-3067

P & A CODE 00089

* PROBLEM CODE	
[REDACTED]	
* PART CODE	
[REDACTED]	
* WORK CODE	
[REDACTED]	
DATE AND MILEAGE AT TIME OF VEHICLE RECALL	
DATE	MILEAGE (ED TOWNS)
NO	YES
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE (ED TOWNS)
NO	YES

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
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OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW X

EDgewater ANNE ARUNDEL MD [REDACTED]
TAG# 0704 C W RO# C18189-6
2FALP74H7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 06/23/95 19:03:34
LIC# MD 1 6TK#1000R0398
DATES: BEGIN: 042195 DONE: 062395 INVC: 022895 SOLD: 022895 PROD: 113093
ADV: 648 DCI 1FA 27H418
HOME: [REDACTED] ODOMETER IN: 5073 TX: 1
WORK: [REDACTED]

LN 94 5K SVC	TECH 791	S 23.20
31 COMPLETED SERVICE		SANFORD, ROB
VEN PART NUMBER	OP-5K	
PNC FL 820	DESCRIPTION	QTY PRICE & EXTENDED
PNC 5K30	FILTER	1 8.63 8.63
	OIL	5 1.75 8.75
PARTS AMOUNT		17.38
LAB AMOUNT		23.20
SERVICE SPECIAL ADJUST		4.03
LINE TOTAL - DEPT D		34.55

PARTS 17.38
SUPPLIES 4.64
LAB-MECHANICAL 23.20
SERVICE SPECIAL ADJUSTMENT 4.03
SUB-TOTAL 41.19
TAX .90
TOTAL-CHARGES 42.09
VISA 004014 42.09

VISA /// MASTERCARD ///

LAB RATE: 64.00
PREFERRED TREATMENT
ATTENTION
WARRANTY MUST BE PRINTED ALSO
RM

PAGE 1 OF 3



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8650, WASHINGTON 261-8220
DIRECT LINE 265-3087

P & A CODE 00089

PREPARE ORDER	
NAME	
ADDRESS	
CITY AND STATE	
ZIP	
PHONE	
ELECTRIC CODE ON IN	
CREDIT CODE	
DATE AND RELEASE AT TIME OF VEHICLE PICKUP	
DATE	
RELEASE NO. TESTER	
DATE	
RELEASE NO. TESTER	

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 8:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒

[REDACTED]

TAQ: 0704 C W RO: C18169-6
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 06/23/95 19:03:34

EDGEWATER

MD

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. PENNELL



KRM
6/23

PAGE 2 OF 3

FORD



FORD

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8660, WASHINGTON 261-8220
DIRECT LINE 288-3087

P & A CODE 00089

PREVIOUS OWNER		NAME AND ADDRESS	
MODEL		YEAR	
SERIAL		VIN	
APPROVAL CODE		APPROVAL CODE	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT		MILEAGE AND TERMS	
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE		MILEAGE AND TERMS	

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW X

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT

APR 01 1997

OFFICE OF THE
GENERAL COUNSEL
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICKUP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

000R0398

TACT 0776 W P RDI W10371-2

2FALP74W7RX126232 DK RED/MAR

24 FORD CROWN VIC LX 4DR SDN

INVOICED AT: 02/02/95 11:17:52

SEK#: 000R0398 1000

PROD: 113093

DATES: BEGIN: 013095 DONE: 020195

ADV: 287 DC: 1FA

ODOMETER IN: 37

TX: 1 NW

95033

LN AMP LIGHT ON : TECH 889 LAB HRS .7 37.06
51 BATTERY & ALTERNATOR SHORTED : VOLTA, CARLO
ALTERNATOR - REMOVE AND INSTALL D: OP-10346A FC-X1
R REPLACE

LN ALTERNATOR CIRCUITS (USING VOLTME) : TECH 889 LAB HRS .3 16.23
51-1 TER) - TEST : VOLTA, CARLO

OP-10200A FC-X1

LN REPLACE BATTERY : TECH 889 LAB HRS .3 16.23
51-2 : VOLTA, CARLO

OP-10654B FC-X1

LN WIRING ASSEMBLY - REPAIR : TECH 889 LAB HRS .5 27.06
51-3 : VOLTA, CARLO

OP-14200A FC-X1

VEN PART NUMBER DESCRIPTION NOTE QTY PRICE @ EXTENDED

FMC*E9AZ 14526 A *WIR ASY-F 1 5.61 5.61

FMC*F1VY 10346 D ALT ASY- 1 152.75 152.75

FMC*F0DZ 10316 A REGULATOR 1 37.50 37.50

FMC*F1DZ 10347 A HOLDER & 1 3.78 3.78

FMC BXT 65 650 BATTERY A 10 83.14 83.14

PARTS COUNT 5

PARTS AMOUNT 362.60

LAB AMOUNT 77.40

LINE TOTAL - DEPT D 460.00

MG

PAGE 1 OF 2

END-828 44582



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8550, WASHINGTON 261-8220
DIRECT LINE 268-3087

P & A CODE 00089

PROGRAM COUNTRY		DATE OF VISIT	
PERSON 1	REPORTED PERFORMANCE EVALUATION		
PERSON 2	APPROXIMATE DEPARTURE DATE		
PERSON 3	APPROXIMATE COST CENTS	APPROXIMATE COST	
DATE AND MILAGE AT TIME OF VEHICLE REPORT			
DATE		MILEAGE (M/T/TH/TH)	
MIL	MPH	YR	
DATE AND MILAGE AT TIME OF VEHICLE FAILURE			
DATE		MILEAGE (M/T/TH/TH)	
MIL	MPH	YR	

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒

00000378

TAG: 0796 W P RO: W10371-2
2FALP74W7RX126232 DK RED/MA
94 FORD CROWN VIC LX 4DR SED
INVOICED AT: 02/02/95 11:17:52

PARTS	362.63
LAB-MECHANICAL	97.40
TOTAL-CHARGES	460.03
CAC WARRANTY	460.03

LAB RATE: 62.00

IF YOU HAVE ANY QUESTIONS PLEASE SEE TROY V. GRESHAM
ME

PAGE 2 OF 2

JD 2/2

CUSTOMER PAY ☐ WARRANTY ☐

- CUSTOMER'S RIGHTS**
1. CUSTOMER WANTS REPLACED PARTS IF NOT REPAIRABLE LINE
 2. DO YOU WANT WRITTEN ESTIMATE SINCE IT EXCEEDS \$50.00, YES NO
 3. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT.
 4. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES

CUSTOMER'S SIGNATURE
 REPAIRS CHARGED FOR WHEN NEEDED AND PERFORMED. ALL PARTS LISTED ARE USED OR EQUIVALENT. LABOR CHARGES ARE COMPUTED BY FLAT RATE UNLESS CUSTOMER LIAISON CHARGES ARE BASED ON THE RATE OF PER HOUR.

CHARGE LINE	OIL CHANGE	DEL & FILTER	WASHER CONTROL	WAX TRUCKS	TIME UP MARCH	PC PT WIL BIRDS	SUSPECT BANGS	BALANCE WHEELS	FRONT END ALIGN	SAFETY HIPS	NOTATE PAIR	SCREPE BARGE	STEVE WIP	FLA PORT WAGS	FLA REAR BOX	NOT & BAL T	SVC COOL SYS	AGREENT QUALITY	ELECTRICALS	SERVICE AC	W.C. SYS (V) IN	LOAF SPECIAL	FORD MAINT	WHEEL ALIGN	4 WHEEL ALIGN	27	28	29
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	26	27	28	29

WASH CHARGE EQUIVALENT TO 1/2 HRS OF LABOR CHARGE IS INCLUDED FOR MATERIALS. IS APPLICABLE. SUPPLY ITEMS ARE NUTS, BOLTS, WASHERS, PINS, AEROBRAVES, BLS, BATTERY CLEANERS, ETC.

STANDARD RATE OVER 30 HRS. SUBJECT TO A 50% CHARGE. 10.00 PER DAY.

PARTS & LABOR WARRANTED 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE.

THIS IS A NON-TRANSFERABLE DOCUMENT. IT IS THE PROPERTY OF THE SERVICE CENTER. IT MUST BE RETURNED WITHIN 30 DAYS OF THE DATE OF SERVICE. IF NOT RETURNED, A FINE OF \$10.00 WILL BE CHARGED.

INSTRUCTIONS ON WORK TO BE DONE

REPAIR TYPE: N
 RMP LIGHT ON

CHANGE: *Change Bell Replac battery*

REPAIR: *Remove Rear Distribution Box*

COMPLAINT: *Input for shorts Replace Main*

COMPLAINT: *pull link at Power Box*

COMPLAINT: *check charging system*

COMPLAINT: *Replace Alternator*

COMPLAINT: *charging system & battery*

COMPLAINT: *intermittently shorts*

COMPLAINT: *OK*

COMPLAINT: *FOR NOU*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

COMPLAINT: *OK*

OPERATION HRS

FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

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RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

TECH OPERATION HRS

OLH FLG FAILED PART

RC NET CND AUTH

WFOU 10371**7 *TRD 0796* LIC: 000R0398

SVC HDV: 287 TROY V. GRESMAN 94 **VIN: 2FALP74W7 RX126232**

FORD CROWN VIC 4DR SDN

LX LICENSE: DK RED/MAR CAR

STOCK NUMBER: 000R0398 INV ACCT: 1300

ODOMETER: LAST: 7 CURRENT: 37

AVG PER DAY: PER MONTH

DIST CODE: 1FA

WARNING: POSSIBLE RECHECK 0000007

EXTENDED SVC PLAN: TYPE: NO IN FORCE: N

NUMBER: ESP INFORMATION

01/30/95 16:13:13

***PROMISED DATE: 01/30/95 TIME: 1800 ***

MODEL: P74

LT 2 07968 * DO 103718 * CUD PLAN 007

8882-025 44564



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-6650, WASHINGTON 281-8220
DIRECT LINE 286-3087

P & A CODE 00089

PROBLEM CODE		MISC REFERENCE NUMBER	
1			
2			
3			
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT		MILEAGE AND DATE	
DATE		MILEAGE	
MO	DAY	YR	
DATE AND MILEAGE AT TIME OF VEHICLE RETURN		MILEAGE AND DATE	
DATE		MILEAGE	
MO	DAY	YR	

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SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW X

EDGEWATER MD
ANNE ARUNDEL
DATES: BEGIN: 030995 DONE: 031095
ADV: 946 DC: 1FA ACCT: 031095
HOME: [REDACTED]
TAG: 3909 C RO: 012565-3
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 03/11/95 11:54:25
LIC: MD STK#: 000R0398 1300
INSVC: 022895 SOLD: 022895 PRODI: 113093
27H418
ODOMETER IN: 93 TX: 1

LN	INSTALL FORD 400 ALARM SYSTEM	TECH 134	186.00
51	INSTALL FORD 400 ALARM SYSTEM	CHAMBERS, JOHN	
	VEN PART NUMBER DESCRIPTION	OP-INSTALL	
	FMC*F3AZ 19A361 C KIT ELECT	NOTE	
	PARTS AMOUNT	QTY PRICE @ EXTENDED	
	LAB AMOUNT	1 185.39 185.39	
	LINE TOTAL - DEPT D		185.39

LN	INSTALL AUTO ARMOR PROT. PKG.	TECH 500	3 484.55
52	INSTALL AUTO ARMOR PROT. PKG.	MISC TECH SVC	
	LAB AMOUNT	OP-INSTALL	
	LINE TOTAL - DEPT D	AUTH-DW	
			484.55

PARTS	185.38
LAB-MECHANICAL	670.55
SUB-TOTAL	855.93
TAX	9.27
TOTAL-CHARGES	865.20
VISA	004014 865.20

VISA /// MASTERCARD ///

LAB RATE: 62.00
PREFERRED TREATMENT
LG

\$45110

PAGE 1 OF 3

TABLE 1. *Summary of the 1997-1998 season*



P & A CODE 00089

PROGRAM CODES					
PART 1					
PART 2					
PART 3					
DATE AND HOURS AT TIME OF VISIBLE PHASES					
DATE		HOURS AND MINUTES			
DATE AND HOURS AT TIME OF VISIBLE HOLDING					
DATE		HOURS AND MINUTES			

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000R0398

TAG: 9637 1 P RO: 184907-9
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 12/10/93 10:10:07
PROD: 113093
STK#: G00R0398 5020

DATES: BEGIN: 120893 DONE: 121093
 ADV: 765 DC: 1FA

ODOMETER IN: 4

TXN 1

LN	PDI
51	PDI
	PDI

1 TECH 749 LAB HRS 1.7 68.85
1 SELBY, JOSEPH
1 OP-PDI

LAB AMOUNT
LINE TOTAL - DEPT D

0
68.85
68.85

LAB-MECHANICAL	68.85
TOTAL-CHARGES	69.65
INTERNAL	68.85

LAB RATE: 54.00
INTERNAL

13

PAGE 1 OF 1

CUSTOMER'S NAME: _____

1. CUSTOMER WANTS REPLACED PARTS IF NOT REPAIRABLE UNDER WARRANTY. YES _____ NO _____

2. DO YOU WANT A WRITTEN ESTIMATE SINCE IT EXCEEDS \$50. YES _____ NO _____

3. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN 10% OF THE COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT.

4. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES _____ NO _____

SIGNATURE

PERMITS CHARGES WHEN NEEDED AND PERFORMED. ALL PARTS USED ARE NEW UNLESS IDENTIFIED
USED ON PHOENIX. LABOR CHARGES ARE COMPUTED AT FLAT RATE UNLESS OTHERWISE SPECIFIED
CUSTOMER LABOR CHARGES ARE BASED ON THE RATE OF PER HOUR

SEAL MATERIAL: A TORQUE WRENCH EQUIVALENT TO 1/4" OF LUBRICANT GRADE IS INCLUDED FOR MATERIALS USED ON YOUR VEHICLE. APPLICABLE SUPPLY ITEMS ARE NUTS, BOLTS, WASHERS, PINN, MEMBRANE, SOLVENT, RACE TONNEL, BATTERY CLEANER, ETC.

[illegible]

INSTRUCTIONS ON WORK TO BE DONE

01 COMPLAINT		TECH		OPERATION		HRS	
CAUSE		749				1.7	
CORRECTION		OLH		FLG		FAILED PART	
		RC		NET		CMD	
						AUTH	
02 COMPLAINT		TECH		OPERATION		HRS	
CAUSE		OLH		FLG		FAILED PART	
CORRECTION		RC		NET		CMD	
						AUTH	
03 COMPLAINT		TECH		OPERATION		HRS	
CAUSE		OLH		FLG		FAILED PART	
CORRECTION		RC		NET		CMD	
						AUTH	
04 COMPLAINT		TECH		OPERATION		HRS	
CAUSE		OLH		FLG		FAILED PART	
CORRECTION		RC		NET		CMD	
						AUTH	
05 COMPLAINT		TECH		OPERATION		HRS	
CAUSE		OLH		FLG		FAILED PART	
CORRECTION		RC		NET		CMD	
						AUTH	

***RD 84207**--2 *TAG 2632* LIC1
 SVC ADVL 745 BROOK SHULTS

##BD 84907##-9 #TAG 9637# LIC

SVC ADVL 745 BROOK SHOU TS

000R0398

94 *#VIN# 2FALP74W7 RX126232**

FORD

CROWN VIC

1.3

4DR 3DN

LICENSEE

DK RED/MAR CAR

SVC DLR: 209001

STOCK NUMBER: C00R0398 INV ACCT: 5020

PROD: 113093

CURRENT: 4

DIST CODE: 1FA

255 NOTE: INTERNAL

****PROMISED DATE: 12/08/93 TIME: 1600 ****

MODEL# P74

TAG 9637 *TRD 84907** SVC: ADVI 765

VIN: 2FAH P74W7 RX124230

5902-023 44560



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8550, WASHINGTON 281-8220
DIRECT LINE 286-3087

P & A CODE 00089

PROGRAM CODE	
REFUSE	MECH REFERENCE NUMBER
REFUSE	APPROVED TO BE USED BY
REFUSE	APPROVED TO BE USED BY
DATE AND MILEAGE AT TIME OF VEHICLE ACCEPT	
DATE	MILEAGE
DATE AND MILEAGE AT TIME OF VEHICLE RETURN	
DATE	MILEAGE
DATE	MILEAGE
DATE	MILEAGE

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MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICKUP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒

000R0398

TAG# 0912 W P RO: W90454-1
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 03/21/94 12:05:13
PROD: 113093
STK#: 000R0398 1300

DATES: BEGIN: 031594 DONE: 032194
ADV: 306 DC: 1FA

ODOMETER IN: 7

TX: 1

94080

LN SPEEDOMETER IN DASH DOES NOT READ: TECH 552 LAB HRS 1.1 57.78
51 OVER 20 MPH : MONK, ANTHONY
LOOSE CONN. : OP-10848A FC-33
DIAG., REPL. HEAD ASSY. : FP-10849

PART#FMC F3VY 10849 AR *CLUSTER QTY 1 111.12 111.12
PARTS AMOUNT 155.57
LAB AMOUNT 57.78
LINE TOTAL - DEPT D 213.35

PARTS 155.57
LAB-MECHANICAL 57.78
TOTAL-CHARGES 213.35
FAC WARRANTY 213.35

LAB RATE: 62.00

MV

PAGE 1 OF 1

H 3/27

PRESENT CUB

FD-302 (Rev. 4-15-64)



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8580, WASHINGTON 281-8220
DIRECT LINE 266-3087

P & A CODE 00089

CUSTOMER RECORD	
NAME	ADDRESS
PHONE	CITY
DATE	TIME
DATE AND RELEASE AT TIME OF VEHICLE RECEIPT	
DATE	RELEASED BY
DATE	RELEASED BY
DATE	RELEASED BY
DATE	RELEASED BY

PLEASE RETAIN THIS COPY AS
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MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW

[Signature]

EDGEWATER
ANNE ARUNDEL

MD

TAG: 0704 C W P RD: H10132-4

2F ALI 74W7RX126232 DK RED/MAR

24 FORD CROWN VIC LX 4DR SDN

INVOICED AT: 06/29/75 14:17:53

LIC: MD 1 STK#: 000R0370

DATES: BEGIN: 062195 DONE: 062095 INVO: 022095 GOLD: 022095 PRPB: 110093

ADV: 343 DC: 1CA

27:410

HOME:

ODOMETER IN: 5070

TX: 1

WORK:

95174

LN TURN SIGNALS AND A/C INOP SEE CUS: TECH 791 LAD IRS .2 11.19

S2 T NOTE

SANFORD, ROB

FUSE MISSING

OF 14526A

FC 57

FUSE - REPLACE CHECK OPERATION OF

AC & SIGNALS COULD NOT VERIFY

VEN PART NUMBER DESCRIPTION NOTE QTY PRICE @ EXTENDED

FMC0922 14526 B FUSE

PARTS COUNT

2 .27 .54

PARTS AMOUNT

.76

LAD AMOUNT

11.19

LINE TOTAL - DEPT D

11.95

PARTS

.76

LAD MECHANICAL

11.19

TOTAL CHARGES

11.95

TAC WARRANTY

11.95

LAD RATE: 34.00

PREFERRED TREATMENT

ATTENTION:

CUST-PAY MUST BE PRINTED ALSO

KAMI 1/6/75

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. PENNELL

MO

PAGE 1 OF 1

CUSTOMER PAY ☐ WARRANTY ☐ INTERNAL ☐

PARTS DEPT

ESTIMATE

DATE

TIME

CREDIT CARD ☐

CUSTOMER'S RIGHTS

1. CUSTOMER WANTS REPLACED PARTS IF NOT RETURNABLE UNDER WARRANTY. YES ☒ NO ☐
2. DO YOU WANT A WRITTEN ESTIMATE SINCE IT EXCEEDS \$50. YES ☒ NO ☐
3. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN 10% OF THE COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT.
4. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES ☐ NO ☒

CUSTOMER'S SIGNATURE

7. REPAIR CHARGES FOR WORK NEEDED AND PERFORMED. ALL PARTS LISTED ARE NEW UNLESS OTHERWISE NOTED OR REBUILT. LABOR CHARGES ARE COMPUTED BY PLAT RATE UNLESS OTHERWISE SPECIFIED. CUSTOMER LABOR CHARGES ARE BASED ON THE RATE OF PER HOUR

8. SHOW MATERIAL: A TOWN CHARGE EQUIVALENT TO 10% OF LABOR CHARGE IS INCLUDED FOR MATERIALS USED ON YOUR VEHICLE. APPLICABLE SUPPLY ITEMS ARE NUTS, BOLTS, WASHERS, PINS, ADJUSTERS, SCREWS, RAGS, TOWELS, BATTERY CLEANERS, ETC.

CHARGE USE	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	26	27	28	29
DR. CHARGE																													
DR. FILTER																													
SENSOR CONTROL																													
SPC TRANSMISSION																													
TUNE UP UNIFORM																													
PAINT WASH																													
ROCKET BRUSH																													
BALLANCE BARS																													
FRONT END ALIGN																													
SAFETY INSPECTION																													
ROTATE TIRES																													
SCREPE ENGINE																													
STATE INSPECTION																													
ALIGN FRONT ENDS																													
FLYER REAR ENDS																													
ROT & BAL 4 TIRES																													
SVC COOL SYS																													
ADJUST CLUTCH																													
ELECTRICAL SYS																													
SERVICE AIR																													
SEC SYS CHECK																													
L.O. SPECIAL																													
FOUR WHEEL																													
4 WHEEL ALIGN																													

9. MATERIALS: ALL MATERIALS ARE SUBJECT TO A 10% TOWN CHARGE. 1.00 PER DAY

PARTS & LABOR WARRANTED 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS WORK ORDER.

INSTRUCTIONS ON WORK TO BE DONE

DEPT. PAY. TYPE: C CC: X99

94 5R SVC

CAUSE: *perform SE*

CORRECTION:

DEPT. PAY. TYPE: H CC: C05

TURN SIGNALS AND A/C INOP SEE CUS

CAUSE: *Install 15 amp fuse in position #10*

CORRECTION: *road test check operation of a/c*

DEPT. PAY. TYPE: H CC: C05

system & turn signals could not verify

CAUSE: *any problem at this time. run*

CORRECTION: *service message, one found at this time*

DEPT. PAY. TYPE: H CC: C05

CAUSE:

CORRECTION:

DEPT. PAY. TYPE: H CC: C05

CAUSE:

CORRECTION:

DEPT. PAY. TYPE: H CC: C05

CAUSE:

CORRECTION:

TECH: 791 OPERATION: HRS

OLH: FLG: FAILED PART

RC: NET: CND: AUTH:

TECH: 791 OPERATION: HRS

OLH: FLG: FAILED PART

RC: NET: CND: AUTH:

TECH: 791 OPERATION: HRS

OLH: FLG: FAILED PART

RC: NET: CND: AUTH:

TECH: 791 OPERATION: HRS

OLH: FLG: FAILED PART

RC: NET: CND: AUTH:

*R0 18189** - 6 *TAG 0704* LIC: MD 1

SVC ADV: 548 KARL R. PENNELL

MR 94 **VIN: 2FALP74W7 RX126232**

FORD CROWN VIC

LX 4DR 8DN

LICENSE: MD 1 DK RED/MAR CAR

MFG CODE: 27H418 SVC DLR: 209001 SLM: 912

STOCK NUMBER: 000R0398

IN-SVC: 022895 SOLD: 022895 PROD: 113093

ODOMETER: LAST: 93 CURRENT: 5073

AVG PER DAY: 4 PER MONTH: 120

EDGEWATER

MD

HOME:

WORK:

PREFERRED CUSTOMER

113

QCP

QUALITY CHECK REQ.

COMB: NA

DEDUCTIBLE: 50.00

MONTHS: 48 MILEAGE: 75000 EXPIRES: 022899

06/21/95 16:35:35

255 NOTE: PREFERRED TREATMENT

***PROMISED DATE: 06/21/95 TIME: 1600 ***

MODEL: P77

EA82-025 44572



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8650, WASHINGTON 251-8220
DIRECT LINE 268-3087

F & A CODE 00089

PROGRAM CODES			
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PAGES 99		PAGES 100	

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7:30 AM TO 6:00 PM**

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABORS
LISTED BELOW ☒

TAG: 0704 C W P RD: C18109-
2FALP74W/RX126232 DK RED/MAR

94 FORD CROWN VIC LX 4DR SDN

INVOICED AT: 06/23/95 14:14:50

LIC: MD 1 STK#: 000R0350

EDWARDS, EIT

MI

ANNE ARUNDEL

DATE3: BEGIN: 062198 DONE: 062323 INSV: 022695 SOLD: 022095 PROD: 113023

ADV: 640 DC: 15A

2711410

HOME :

ODOMETER IN: 5073

THE 1

WORK:

LN 24 BK SVC
31 COMPLETED SERVICE

* TECH 721

5 23.20

CANFORD, BOB

VEN	PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE @	EXTENDED
FMC FL	020	FILTER AO		1	0.63	0.63
FMC	5W30	OIL		5	1.75	0.75
	PARTS AMOUNT					17.30
	LAB AMOUNT					23.20
	SERVICE SPECIAL ADJUST					4.03
	LINE TOTAL - DEPT D					36.55

PARTS	17.38
SUPPLIES	4.64
LAB-MECHANICAL	23.20
SERVICE SPECIAL ADJUSTMENT	4.03
SUB-TOTAL	41.19
TAX	.90
TOTAL-CHARGES	42.09
CASH DUE	42.09

LOAD RATE: 64.00
PREFERRED TREATMENT
ATTENTION-----

WARRANTY MUST BE PRINTED ALSO

MO

PAGE 1 OF 3



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8550, WASHINGTON 281-8220
DIRECT LINE 288-8087

P & A CODE 00089

PREVIOUS CREDIT	
DATE	AMOUNT
DATE	AMOUNT
DATE	AMOUNT
DATE AND AMOUNT AT TIME OF VEHICLE RECEIPT	
DATE	AMOUNT
DATE AND AMOUNT AT TIME OF VEHICLE RELEASE	
DATE	AMOUNT

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒

EDGEMATER MD TAG: 0704 C W RO: C18189-6
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 06/23/95 19:03:34

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. PENNELL


FORD

2540 BYVA ROAD, ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE MD 355-0100 WASHINGTON 281-8220
DIRECT LINE 281-3087

P & A CODE 00089

[illegible]

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12 MONTHS OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PAPER AND LABOR
LISTED BELOW X

TAGI 0704 C W RO: C18189-6
 2FALP74W7RX126232 DK RED/MAR
 94 FORD CROWN VIC LX 4DR SDN
 MD [REDACTED] INVOICED AT: 06/23/95 19:03:34
 LIC: MD-1 STKN: 000R0398
 DATES: BEGIN: 062195 DONE: 062395 INVC: 022895 SOLD: 022895 PROD: 113093
 ADV: 648 DCI 1FA 27H418
 NAME: [REDACTED] ODOMETER IN: 3073 TX: 1
 WORK: [REDACTED]

QTY	PRICE	EXTENDED
94.5K SVC		
COMPLETED SERVICE		
TECH 791		
SANFORD, ROB		
QTY	PRICE	EXTENDED
1	8.63	8.63
5	1.75	8.75
PARTS AMOUNT		17.38
LAB AMOUNT		23.20
SERVICE SPECIAL ADJUST		4.03
LINE TOTAL - DEPT D		36.55

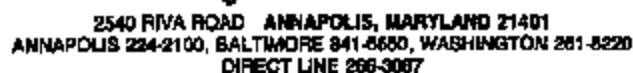
PARTS	17.38
SUPPLIES	4.64
LAB-MECHANICAL	23.20
SERVICE SPECIAL ADJUSTMENT	4.03
SUB-TOTAL	41.19
TAX	.90
TOTAL-CHARGES	42.09
CASH	42.09

UNSA//AK-MASTERBOARD ///

LAB RATE: 64.00
PREFERRED TREATMENT
ATTENTION
WARRANTY MUST BE PRINTED ALSO

PAGE 1 OF 3

FD-302 (Rev. 4-15-64)



P & A CODE 00069

APPROPRIATE COUNTRIES			
REPORT 1	[REDACTED]		
REPORT 2	[REDACTED]		
REPORT 3	APPROPRIATE COUNTRIES	COUNTRY OF ORIGIN	
DATE AND RELEASE AT TIME OF VEHICLE PURCHASE			
DATE	MILEAGE AND LOCATION		
MO.	DAY	YR.	
DATE AND RELEASE AT TIME OF VEHICLE RELEASE			
DATE	MILEAGE AND LOCATION		
MO.	DAY	YR.	

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 8:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 8:00 AM TO 1:00 PM

~~I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW~~

ENDWATER

MD

TAG: 0704 C W P RO: C18189-6
2FALP74W7RX126232 BK RED/MA
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 06/23/95 14:16:54

IF YOU HAVE ANY QUESTIONS -- PLEASE SEE KARL R. PENNELL

MG

PAGE 2 OF 3

ERG2-025 44578



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8660, WASHINGTON 281-8220
DIRECT LINE 268-3087

P & A CODE: 00089

DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE
DATE AND MILEAGE AT TIME OF VEHICLE RETURN	
DATE	MILEAGE

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY-THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICKUP
7:30 AM TO 7:00 PM
SAT. 9:30 AM TO 1:00 PM

ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW ☒

TAX: 10427 C		RD: C2286-11
2540 RIVA RD 21401		DK BED/MAR
94 FORD ESCORT LX 4DR 8DN		
INVOICED AT: 09/06/95		19115/169
LIC: MD		STK#: 00080398
INSVC: 022895		SOLD: 022895
PROD: 113095		27H418
ODOMETER IN: 9870		TX: 1

WEEK SERVICE
COMPLETED SERVICE

TECH: 707
OP-10K

S 11.60
REED, DERICK L.

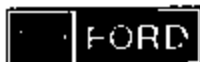
PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE @	EXTENDED
620	FILTER		1	8.63	8.63
5W30 QSP	MOTOR		5	3.31	16.55
PARTS AMOUNT					25.18
LAB AMOUNT					11.60
SERVICE SPECIAL ADJUSTMENT					11.63
LINE TOTAL					24.95

PARTS	25.18
LABOR	2.32
EQB-MECHANICAL	11.60
SERVICE SPECIAL ADJUSTMENT	11.63
SUB-TOTAL	27.27
TAX	.78
TOTAL CHARGES	28.05
VISA	004014
MASTERCARD	28.05

RATE: 64.00

IF YOU HAVE ANY QUESTIONS -- PLEASE SEE TROY V. GRESHAM

PAGE 1 OF 2



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-5560, WASHINGTON 251-8220
DIRECT LINE 206-3087

P & A CODE: 00089

DATE AND TIME OF SERVICE	
DATE	TIME
VEHICLE MAKE, MODEL AND YEAR	
MAKE	MODEL
VEHICLE LICENSE	
VEHICLE VIN	
VEHICLE COLOR	
VEHICLE EQUIPMENT	
VEHICLE CONDITION	
VEHICLE MILEAGE	
VEHICLE OIL	
VEHICLE TIRE	
VEHICLE WASH	
VEHICLE POLISH	
VEHICLE OTHER	

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 2,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 8:30 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW

W. S. Smith

EDDOWATER
ANNE ARUNDEL

MD

TAG: 0427 C P RO: C22386-
2FALP74H7RX126232 DK RED/MAR

94 FORD CROWN VIC LX 4DR SDN

INVOICED AT: 09/06/95 08:52:09

LIC: MD 1 STK#: 000R0398

DATES: BEGIN: 090695 DONE: 090695 INSVC: 022895 SOLD: 022895 PROD: 113095

ADM: 287 DC: 1FA

27H410

MOBILE
WORK

ODOMETER IN: 9870

TX: 1

1.0K SERVICE
COMPLETED SERVICE

TECH 707

S 11.60

REED, DERICH L.

WARRANT NUMBER

DESCRIPTION

QTY PRICE & EXTENDED

FL 820

FILTER

1 8.63 8.63

XP 5W30 GSP

MOTOR OIL

5 3.31 16.55

PARTS AMOUNT

25.18

LAB AMOUNT

11.60

SERVICE SPECIAL ADJUST

11.63

LINE TOTAL - DEPT D

24.95

PARTS 25.18
SUPPLIES 2.32
LAB-MECHANICAL 11.60
SERVICE-SPECIAL ADJUSTMENT 11.63
SUB-TOTAL 27.27
TAX .78
TOTAL-CHARGES 28.05
CASH DUE 28.05

LAB RATE: 64.00

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. GRESHAM

PAGE 1 OF 2

EA02-025 44578

CUSTOMER PAY ☐ WARRANTY ☐ INTERNAL ☐		PARTS DISPOSAL ☐ SCRAP RETURN ☐		TERMS: CASH ☐ CREDIT CARD ☐	
CUSTOMER'S RIGHTS 1. CUSTOMER WANTS REPLACED PARTS IF NOT RETURNABLE UNDER WARRANTY, YES ☐ NO ☐ 2. DO YOU WANT A WRITTEN ESTIMATE SINCE IT EXCEEDS \$50, YES ☐ NO ☐ 3. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN 10% OF THE COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT. 4. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES ☐ NO ☐ CUSTOMER'S SIGNATURE: _____ DATE: _____					
VEHICLE INFORMATION YEAR: _____ MAKE: _____ MODEL: _____ ENGINE: _____ TRANSMISSION: _____ DRIVE: _____ COLOR: _____ VIN: _____					
WORK ORDER DESCRIPTION OF WORK: _____ ESTIMATE: _____ DATE: _____					
VEHICLE LEFT OVER 48 HRS. SUBJECT TO A STORAGE CHARGE OF \$10.00 PER DAY. PARTS & LABOR GUARANTEED 12 MONTHS OR 100,000 MILES WHICHEVER COMES FIRST. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE.					
PG 1 OF 1					
10K SERVICE Completed					
TECH OPERATION HRS 707 707 0.2					
OLH FLG FAILED PART					
RC NET CND AUTH					
TECH OPERATION HRS					
OLH FLG FAILED PART					
RC NET CND AUTH					
TECH OPERATION HRS					
OLH FLG FAILED PART					
RC NET CND AUTH					
TECH OPERATION HRS					
OLH FLG FAILED PART					
RC NET CND AUTH					
TECH OPERATION HRS					
OLH FLG FAILED PART					
RC NET CND AUTH					
SVC ADV: 287 TROY V. GRESMAN MR 94 **VINI 2FALP74W7 RX126232** FORD CROWN VIC LX 4DR SED LICENSE: MD 1 BK RED/MAR CAR MFG CODE: 27H418 SVC DLR: 209001 SLH: 91 STOCK NUMBER: 000R0398 IN-SVC: 022893 SOLD: 022893 PROD: 113093 ODOMETER: LAST: 5073 CURRENT: 9870 AVG PER DAY: 44 PER MONTH: 1320					
EDGEWATER MD RESV					
PHONE: _____ WORK: _____					
DIST CODE: 1FA					
WARNING: POSSIBLE RECHECK 06/23/95					
EXTENDED SVC PLAN: TYPE: EXTRA NUMBER: NA DEDUCTIBLE: 50.00 IN FORCE: Y MONTHS: 48 MILEAGE: 75000 EXPIRES: 022899 09/06/95 07148125					

Michelle
95-7760

McChesney & Dale, P.C.

Attorneys At Law

Suite 222

4000 Mitchellville Road

Bowie, MD 20716

WILLIAM P. DALE DC, MD
CHARLES F. FULLER DC, MD
ROBERT W. MCCHESENEY, JR. DC, MD
DAVID A. CONNOLLY, JR. DC, NY

(301) 805-6080
Fax (301) 805-6080

JAMES S. POWELL DC, VA (of course)
AGNES BOWERSOX Paralegal

1225 Connecticut Ave., N.W.
Suite 300
Washington, D.C. 20036

2 Wisconsin Circle, Suite 640
Cherry Chase, MD 20815

5661 Columbia Pike, Suite 100
Jolly Church, VA 22041
(703) 998-0732

July 30, 1996

Mr. Harold E. Keyes
Senior Claims Analyst
Office of General Counsel
Ford Motor Company
Parklane Towers West, Suite 300
3 Parklane Blvd.
Dearborn, Michigan 48126-2568

RE: [REDACTED]

Dear Mr. Keyes:

This is a corrected copy of the letter sent to you dated July 25, 1996, signed by Charles F. Fuller. We apologize for any confusion this may have caused. "Please be advised that this firm has been retained to represent [REDACTED] in his claim for damages arising out of the September 21, 1995 fire involving his 1994 Ford Crown Victoria, VIN 2FLAP74WRX126232. [REDACTED], as well as Koons Ford of Annapolis, Inc., have previously provided you with notice of this incident and [REDACTED] intention to make a claim against Ford."

Please forward all future correspondence Charles F. Fuller at the above referenced address.

I thank you for your consideration.

Very truly yours,

Agnes Bowersox

Agnes Bowersox
Paralegal

cc: [REDACTED]
cc: [REDACTED]

*Recd
8-5*

BATCH-ID S170000018 D YA AA

PRICE LEVEL 410130P74
REQUESTOR: HATHAWAY

VIN: 2FALP74W7RX126232
CASE: SIMPSON W

THIS INVOICE MAY NOT REFLECT THE FINAL COST OF THE VEHICLE IN VIEW OF THE POSSIBILITY OF FUTURE REBATES, ALLOWANCES, DISCOUNTS AND INCENTIVE AWARDS FROM FORD MOTOR COMPANY TO THE DEALER. * THIS PORTION OF THE VEHICLE PRICE WILL BE PROVIDED TO THE APPROPRIATE FORD (LMDA) TO SUPPORT REGIONAL DEALER ADVERTISING.					
REGIONAL ADVERTISING &	INVOICE TOTAL	LESS HOLD BACK FOR DEALER ACCOUNT	LESS APPLICABLE FORD CREDIT FOR DEALER ACCOUNT	LESS INVOICE LESS HOLD BACK & FPL COST	A PLAN

SOLD TO
KOONS FORD OF ANNAPOLIS INC 27H418
2540 RIYA ROAD
ANNAPOLIS MD 21401

FURTHER TERMS ON REVERSE SIDE		
TO	N	DATE
2	MD	

PLT RLSE DTE
11/30/93
CND3

SHIP TO IF OTHER THAN ABOVE

27418

DATE IN. PREPARED	ITEM NUMBER	YR	MM	DAY
11 23 93	27-1216	5H	12	

SHIP THROUGH

INVOICE & UNIT IDENTIFICATION NO.
2FALP74W7RX126232

FINAL ASSEMBLY POINT
ST. THOMAS

FINANCE COMPANY AND/OR BANK
FORD MOTOR CREDIT

000001
DEALER COPY

THIS INVOICE TO BE USED FOR THE BILLING OF VEHICLES ONLY

	1994 1 NM VIC LX 4-DOOR	20	00	19096	00
EG	ELECTR. C RED C/C METALLIC				
5H	MOCHA CLOTH				
	PREFERRED EQUIPMENT PKG. 114A	4370	00	3911	00
12H	FRONT CARPETED FLOOR MATS				
12Q	REAR CARPETED FLOOR MATS				
47J	ILLUMINATED ENTRY SYSTEM				
524	LEATHER-WRAP STEERING WHEEL				
943	LIGHT/DECOR GROUP				
68A	GROUP 1:				
	REAR WINDOW DEFROSTER				
	POWER LOCK GROUP				
	SPEED CONTROL				
65C	GROUP 2:				
	POWER RADIO ANTENNA				
47A	GROUP 3:				
	CORNERING LAMPS				
	CAST ALUMINUM WHEELS				
65D	GROUP 4:				
	DUAL 6-WAY POWER SEATS				
	REMOTE KEYLESS ENTRY				
	REAR AIR SUSPENSION				
	ELECTRONIC GROUP				
	HIGH-LEVEL AUDIO SYSTEM				
	ANTI-LOCK BRAKES/TRACTION CTL				
	AUTO DIM ELECTRONIC MIRROR				
99W	4.6L OHC SEFI V8 ENGINE	NC		NC	
44P	ELECTRONIC AUTO O/D TRANS	NC		NC	
T87	P215/70R15 BSW TIRES	NC		NC	
153	FRONT LICENSE PLATE BRACKET				
	TOTAL VEHICLE & OPTIONS	25085	00	23007	00
	DESTINATION & DELIVERY	575	00	575	00
	TOTAL BEFORE DISCOUNTS	25660	00	23582	00
	**SPECIAL ADDED DISCOUNTS*	935	00-	851	00-
	SPECIAL-VALUE DISCOUNT	1140	00-	1034	00-
	TOTAL SAVINGS	2075	00-	1885	00-
	TOTAL FOR VEHICLE	23585	00		
	10 U.S. GAL GAS FACTORY			14	50
	PRICED DORA				50
	BATCH-ID S170000018 D TA AA				
	SCHEDULE-B LEVEL 00000				
	PRICE LEVEL 410130P74				
	SHIPPING WEIGHT 3639 LBS.				
	VIN: 2FALP74W7RX136232				

THIS INVOICE MAY NOT REFLECT THE FINAL COST OF THE VEHICLE IN VIEW OF THE POSSIBILITY OF FUTURE REBATES, ALLOWANCES, DISCOUNTS AND INCENTIVE AWARDS FROM FORD MOTOR COMPANY TO THE DEALER.					
* THIS PORTION OF THE VEHICLE PRICE WILL BE PROVIDED TO THE APPROPRIATE FORD (LMDN) TO SUPPORT REGIONAL/DEALER ADVERTISING.					
REGIONAL MARKETING ADVERTISING *	INVOICE TOTAL	LESS HOLDBACK FOR DEALER ACCOUNT	LESS APPROX. FINANCING COST FOR DEALER ACCOUNT	NET INVOICE LESS HOLDBACK & FIN. COST	A PLAN
270.00	21,962.00	690.00	180.00	21,112.00	21,074.00

690.00 69.00 2024.00 .50 421.00 18916.00

SOLD TO		FURTHER TERMS ON REVERSE SIDE	
KODONS FORD OF ANNAPOLIS INC 27H418		PLT RLSE DTE	
2540 RIVA ROAD		11/30/98	
ANNAPOLIS MD 21401		CNO3	
SHIP TO (IF OTHER THAN ABOVE)		DATE BIL. PRESENTED	TERM NUMBER
27418		11/23/98	27-1216 5H 12
SHIP THROUGH			

INVOICE & UNIT IDENTIFICATION NO.	FINAL ASSEMBLY POINT	FINANCE COMPANY AND/OR BANK
2FALP74W7RX136232	ST. THOMAS	FORD MOTOR CREDIT

THIS INVOICE TO BE USED FOR THE BILLING OF VEHICLES ONLY

EA02-025 44584



Quality is Job 1.

VEHICLE DESCRIPTION

CROWN
VICTORIA
 1994 LX 4-DOOR
 4-PASSENGER FULL SIZE
 4.6L IHC 90FT V6 ENGINE
 ELECTRONIC AUTO 5/D TRANS

VIN: 2FALP74W9K126232

 EXTERIOR
 ELECTRIC RED C/C METALLIC
 INTERIOR
 BROWN CLTH

STANDARD EQUIPMENT INCLUDED AT NO EXTRA CHARGE

EXTERIOR

- ALL SEASON BSW STEEL
- BELTIN RABIAL TIRES
- DELUXE WHEEL COVERS
- CLEARCOAT PAINT
- UNIQUE LX TRIM/TINT GLASS
- INTERVAL MIRRORFIELD MIPERS
- DUAL REMOTE POWER MIRRORS

INTERIOR

- CLOTH RECLINING SPLIT
- BENCH SEATS W/ARMRESTS
- TLT STR WHL/CRP HOLDERS
- AM/FM STEREO RADIO
- AUTO ON/OFF HEADLAMPS
- AUTO PARKING BRAKE RELEASE
- AIR CONDITIONING-CPC FIDE
- POWER WINDOWS
- REMOTE FUEL DOOR RELEASE
- DRIVER FOOTREST
- CARBON NET/SPARE TIRE CVR

ELECTRONIC

- 4.6L IHC V6 ENGINE
- ELECTRONIC 4-SPD AUTOMATIC
- OVERDRIVE TRANSMISSION
- 3/4 FR/4-BAR LINK REAR
- COIL SPRING SUSPENSION
- SPEED SENSITIVE VARIABLE
- ASSIST POWER STEERING
- NITROGEN GAS-PRESSURIZED
- FR/R SHOCK ABSORBERS

SAFETY

- BEUL (DRIVE/PASS) AIR BAGS
- FR/R 3-PT SAFETY BELTS /
- SHOLLER HARNESSES WITH
- COMFORT ADJUSTMENT
- CHILDPROOF REAR DOOR LOCKS
- POWER 4-WHEEL DISC BRAKES

SECURITY

- 24/76 BURPER TO JUMPER
- ROADSIDE ASSISTANCE

PRICE INFORMATION

Suggested Retail Price

STANDARD VEHICLE PRICE

\$19,715.00

OPTIONAL EQUIPMENT
PREFERRED EQUIPMENT PKG. 114A

\$578.00

- FRONT CARPETED FLOOR MATS
- REAR CARPETED FLOOR MATS
- ILLUMINATED ENTRY SYSTEM
- LEATHER-WRAP STEERING WHEEL
- LIGHT/DECOR GROUP
- REAR WINDOW DEFROSTER
- POWER LOCK GROUP
- SPEED CONTROL
- POWER RADIO ANTENNA
- CORNERING LAMPS
- CAST ALUMINUM WHEELS
- REAL 6-WAY POWER SEATS
- REMOTE KEYLESS ENTRY
- REAR AIR SUSPENSION
- ELECTRONIC DRIFT
- HIGH-LEVEL AUDIO SYSTEM
- ANTI-LOCK BRAKES/TRACTION CTL
- AUTO DIM ELECTRONIC MIRROR
- FRONT LICENSE PLATE BRACKET

NO CHARGE

 TOTAL VEHICLE & OPTIONS \$20,293.00
 DESTINATION & DELIVERY \$75.00

TOTAL BEFORE DISCOUNTS \$20,368.00

 OPTION PACKAGE SAVINGS - \$95.00
 COMPARED WITH BUYING
 THESE OPTIONS SEPARATELY

SPECIAL-VALUE DISCOUNT - \$160.00

TOTAL SAVINGS - \$255.00

TOTAL \$19,913.00

CITY MPG

18



HIGHWAY MPG

25

Actual mileage will vary with
 options, driving conditions,
 driving habits and vehicle's
 condition. Results reported to
 EPA indicate that the majority
 of vehicles with these attributes
 will achieve between

15 and 21 mpg in the city
 and between
 21 and 29 mpg on the
 highway.

1994 CROWN VICTORIA,
 4.6 LITER ENGINE,
 (FEEDBACK FUEL SYSTEM),
 6 CYLINDERS, FUEL INJECTION,
 CATALYST, ELECTRONIC 4-SPEED
 AUTOMATIC TRANSMISSION.

Estimated Annual Fuel Cost: \$ 990

For American Driving
 all vehicles classified as
 LARGE
 have been tested at these ratings
 ranging from 18 to 21 mpg city
 and 24 to 29 mpg highway.

SOLD TO

 KOBBS FORD OF ANnapolis INC
 2540 RIVA ROAD
 ANNAPOLIS

2FALP74W9K126232

SHIP TO (if change from stock ship)

NO FLA

27N 418

ST. THOMAS

COUNTRY

CITY

3170 D TA AA 418 000006

SHIP THROUGH

ITEM: 27-1216

XXXXXX	XXXXXX	XXXXXX	XXXXXX
XXXXXX	XXXXXX	XXXXXX	XXXXXX
XXX	XXX	XXX	XXX
XXXXXX	XXXXXX	XXXXXX	XXXXXX
XXXXXX	XXXXXX	XXXXXX	XXXXXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXX	XXX	XXX	XXX
XXXXXX	XXXXXX	XXXXXX	XXXXXX
XXXXXX	XXXXXX	XXXXXX	XXXXXX
XXX	XXX	XXX	XXX
XXXXXX	XXXXXX	XXXXXX	XXXXXX
XXXXXX	XXXXXX	XXXXXX	XXXXXX

```
*****
*
*
*****
*   GENERATED BY:
*   MICHELLE RATNAWAY
*
*   PHONE: 337-1365
*
*   JOB: 06093531
*
*   JOBDATE: 08/01/96
*
*   TIME: 15:58:42
*
*****
```

VEHICLE HISTORY (SEE-1) TYPE

```
* MODEL YEAR          = 94
* CUT-OFF DATE       = 12JUL96
* REPORT TITLE        = 
* VEHICLE TYPE        = CAR3
* REPORT CLAIM TYPE    = ALL CLAIMS
* REPORT SORT SEQUENCE = PLANT CODE \ SERIAL NO
* PAGE ON PRIMARY SORT=
* PARETO HIS VALUE     =
* PLANT/SERIAL NUMBERS = X12623Z
```

DIAUG96
PAGE 2.01

1994 SE-1(PARTS BY CONCERN CODE (OLD CONDITION CODE) SUMMARY (12JUL96 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
MICHELLE HATHAWAY

PART NO	CC	COUNT
10346		1
10849	33	1
14526		1

EP02-025 44568

D1A0896
PAGE 3.01

1994 SE-II PARTS BY CUSTOMER CONCERN CODE SUMMARY (12JUL96 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
MICHELLE RATHAWAY

PART NO	CCC	COUNT
10346	C29	1
10849	A85	1
14526	C05	1

PR02-025 44588

01AUG96
PAGE 4.01

1994 SE-II PARTS BY CONDITION CODE SUMMARY (12JUL96 C/O)
DATA ORDERED BY DESCENDING PART NO. FREQUENCY
MICHELLE RATHWAY

PART NO	CD	COUNT
10346	X1	1
10849	33	1
14526	59	1

ENC-02 44500

01A0096
PAGE 5.01

1994 SE-11 PART/CONCERN CODE DESCRIPTION SUMMARY (12JUL96 C/O)
DATA ORDERED BY DESCENDING REPAIR COUNT

MICHELLE BATHAWAY

NUMBER	PART DESCRIPTION	COUNT	CC-DESCRIPTION	COUNT	CD-DESCRIPTION	COUNT	CCC-DESCRIPTION	COUNT
10346	ALTERNATOR LESS PUL	1	MISSING CODE	2	X1-SHORTED ELEC WIR	1	AB3-DOES NOT OPER	1
10849	CLUSTER ASY-INST PM	1	33-LOOSE	1	33-LOOSE FIT	1	C05-AC NOT WORKING	1
14526	FUSE-ELECTRICAL CIR	1			59-MISS/INCOR FAST	1	C29-WARNING IND ON	1

01AUG96 CLAIMS LISTING FOR 1994 MODEL [REDACTED]
 PAGE 1 SORTED BY PLATYCODE SERIALNO NILE082

12JUL96 C/O REQUESTED BY:
 DATA SOURCE: PMS 36-11 X33400

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

VEHICLE INFORMATION						REPAIR INFORMATION																				
SERIAL	CAR	B/S	ETS	PLT	PHOB	WARR	SELL	CLAIM	MICRO	C	WCC	PART	CC	CCC	ID	REPR	T	TACT	NILEN	MATL	TOTL	LBR	REPR	ST		
NUMBER	LINE	CCI	MAN	DATE	DATE	DEALR	NUMBER	NUMBER	E	NUMBER						DATE	IS	CODE		COST	COST	MRS	DEALR			
126232	FRD	4LL	WPH	STH	30NOV93	28FEB95	00009	090454	UPN19491	7K11	10849	33	AB3	33	15MAR94	0	1		7	155.57	224	1.3	00009	ND		
** COMMENTS-CLAIM #1 CCOM-SPEEDOMETER IN DASH DOES NOT READ OVER 20 MPH TECH-100RE CONW. DIAG. REPL. HEAD ASSY.																										
126232	FRD	4LL	WPH	STH	30NOV93	28FEB95	00009	010371	58CL4040	7B02	10346		C29	X1	30JAN95	0	EA3		37	282.78	460	1.8	00009	ND		
** COMMENTS-CLAIM #2 CCOM-AMP LIGHT ON> TECH-BATTERY & ALTERNATOR SHORTED ALTERNATOR - REMOVE AND INSTALL OR REPLACE>																										
126232	FRD	4LL	WPH	STH	30NOV93	28FEB95	00009	018109	NF8UG5F0	7K22	14524		C05	39	21JUN95	4	2		5073	0.54	12	0.2	00009	ND		
** COMMENTS-CLAIM #3 CCOM-TURN SIGNALS AND A-C INOP SEE CUST NOTE> TECH-FUSE MISSING FUSE - REPLACE-CHECK OPERATION OFAC & SIGNALS COULD NOT VERIFY>																										

.....+ THIS LISTING CONTAINED 3 TOTAL CLAIMS

McChesney & Dale, P.C.

Attorneys At Law

Suite 222

4000 Mitchellville Road

Bowie, MD 20716

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CHARLES F. FULLER DC, MD

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(301) 806-8080

Fax (301) 806-8088

1225 Connecticut Ave., N.W.

Suite 300

Washington, D.C. 20036

2 Wisconsin Circle, Suite 640

Chung Chase, MD 20815

5661 Columbia Pike, Suite 100

Galls Church, VA 22041

(703) 998-0732

July 25, 1996

Mr. Harold E. Keyes
Senior Claims Analyst
Office of General Counsel
Parklane Towers West, Suite 300
3 Parklane Blvd.
Dearborn, Michigan 48126-2568

RE: [REDACTED]

Dear Mr. Keyes:

Please be advised that this firm has been retained to represent [REDACTED] in his claim for damages arising out of the September 21, 1995 fire involving his 1994 Ford LTD. [REDACTED] as well as Koons Ford of Annapolis, Inc., have previously provided you with notice of this incident and [REDACTED] intention to make a claim against Ford.

Please forward all future correspondence to me at the above referenced address.

I thank you for your consideration.

Very truly yours,

McChesney & Dale, P.C.

By: [Signature]

Charles F. Fuller

CFF:mb

cc: [REDACTED]

cc: [REDACTED]

Recd
7/29/96

CSCN140

VEHICLE DATA

96/08/01 11:19:35

ENTER VIN ==> 2FALP74W7RX126232

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

OWNER NAME :

STREET ADDR :

CITY : EDGEWATER

ST/PRV: MD CTRY:

ZIP/POSTAL CODE: [REDACTED] N/A DATE: 95-12-04

MODEL YEAR : 94 PLANT: X

N/A SOURCE: M

BODY STYLE DESC: 4 DOOR SEDAN LX

SALE DATE: 95-02-28

VEHICLE DESC : 1994 CROWN VICTORIA

PRODUCTION DATE: 93-11-30

DIVISION DISTRICT ZONE DEALER PDC CODE FCSD REGION

SHIP-TO

FACING 1 27 C 418

RESPONSIBLE 1 27 C 418

CA EMISSION : ENGINE TAG CODE : EG806AA

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 01

DSO DISTRICT :

FLEET CODE :

OPEN : 00 CLOSED : 01

DSO NUMBER :

FLEET STATUS :

ACTIVE: 01 HISTORY: 00

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

OGDB353

==>
ENTER CAMPAIGN NBR ==> 94B58 VIN ==> 2FALP74W7RX126232
DEFECT : OWNER GUIDE BODY STYLE DESC: 4 DOOR SEDAN LX
RESP DEALER : 127418 BEGINNING MAILED DATE: 94-12-23
RELEASE DESC : NEW ISSUE TOTAL ENDING MAILED DATE : 94-12-23
CAMPAIGN DIV : 6 FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 : ST/PRV:
CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N N-A EFF DATE: 00-00-00

RESP DEALER : BEGINNING MAILED DATE:
RELEASE DESC : ENDING MAILED DATE :
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:
F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7=FIRST PAGE F8=NEXT PAGE F9=G140
I048-LAST PAGE OGDB353

==>

ENTER CAMPAIGN NUMBER==> 94B58 VIN==> 2FALP74W7RX126232 TYPE OF SEARCH: A
MODEL YEAR: 94 DEFECT: OWNER GUIDE BODY STYLE: 4 DOOR SEDAN LX
NEW STATUS CODE: _____ CAMP DIV : 6
REPAIR INFORMATION: _____ TYPE CODE: _____ SUPP CODE :
REPAIR DATE: _____ DEALER P/A: _____ KIT CODE : AA
MICRO REF: _____ CLAIM NUM: _____ OASIS DATE :
DELETE REASON: _____ VENDOR N/A INFORMATION:
RESP DEALER INFORMATION: _____ NEW: _____ IND: MATCH CODE:
CURRENT: 1 27 418 ASSIGNED: 95-12-05 SOURCE: PK EXTRACT DATE: 94-11-21
***** STATUS INFORMATION: ***** REPAIR INFORMATION: *****
CODE DESCRIPTION DATE TYPE DATE P/A CLAIM# MICRO# CL SRC
F FORCED COMPLETION 96-03-04 B 96-03-04 AUTOC OL
M RELEASED FOR MAILING 94-11-29
H AWAITING MAILING 94-11-09

DELETE REASON:

F1-INQUIRY F2=G140 F3=EXIT F5=G130 F7=FIRST F8=NEXT F9=MORE STATUS
F10=ADD STATUS F11=REVISE
1037-NO MORE DATA TO DISPLAY

OGDB353

ENTER CAMPAIGN NUMBER==> 94B58 VIN==> 2FALP74W7RX126232 TYPE OF SEARCH: A
MODEL YEAR: DEFECT: 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

E807-END OF CAMPAIGNS FOR VEHICLE - CURRENT AND HISTORY DATABASES OGDB353

CSOR0016

MORS II Legal Contact

01/19/1996 13:18:21

WASHINGTON 27 Zn/Tr: C1 m/A: CONTACT NBR: 106315.56 Opened: 12/04/1995
VIN: 2FALP74W7RX126232 Closed: 12/04/1995
Last Name: [REDACTED] Status: CLOSED
Title: [REDACTED] First Name: [REDACTED] MI: [REDACTED]
Address: [REDACTED]
City: EDGEWATER ST/FV: MD Zip/PC: [REDACTED] CC: USA
Home Phone: [REDACTED] Business Phone: [REDACTED] Ext: [REDACTED]
Year: 94 Model: CROWN VICTORIA
Mileage/Km: 1 WSD: 02/28/1995

Dealer Name: KOONS FORD OF ANNAPOLI Sales Code: 127418 PSA: 00089
Causal Code: 02 Symptoms: 704100
Serv Sales: 1 (1 or 2) Origin: GO Trans Region: Trans Date:
Veh Repl:
Case Type: 4A FIRES - FUEL FED Means Code: B LGL INVEST-WTY-ATTY LETTE
Atty Name: Atty Memo:
Claimed Amt: Award Amt:
CANADA ONLY:
Court Code: Award Code:

F1=HELP F3=EXIT F4=COMMENT F5=ADD F6=UPD F9=CLOSE F12=CANC
1053 REQUESTED CONTACT DISPLAYED

OGDB330

CSOR0016

JRS II Legal Contact

12/04/1995 10:27:20

WASHINGTON 27 Zn/Tr: C1 M/A: CONTACT NBR: 106315696 Opened: 12/04/1995
VIN: 2FALP74W7RX126232 Closed: 12/04/1995
Last Name: [REDACTED] Status: CLOSED
Title: [REDACTED] First Name: [REDACTED] MI: [REDACTED]
Address: [REDACTED]
City: EDGEWATER ST/PV: MD Zip/PC: [REDACTED] CC: USA
Home Phone: [REDACTED] Business Phone: [REDACTED] Ext: [REDACTED]
Year: 94 Model: CROWN VICTORIA
Mileage/Km: 1 WSD: 02/28/1995

Dealer Name: KOONS FORD OF ANNAPOLI Sales Code: 127418 P&A: 00089
Causal Code: 02 Symptoms: 704100
Serv Sales: 1 (1 or 2) Origin: GO Trans Region: Trans Date:
Veh Repl:
Case Type: 4A FIRES - FUEL PED Means Code: B LGL INVEST-WTY-ATTY LETTE
Atty Name: Atty Memo:
Claimed Amt: Award Amt:
CANADA ONLY:
Court Code: Award Code:

F1-HELP F3-EXIT F4-COMMENT F5-ADD F6-UPD F9-CLOSE F12-CANC
1030 CONTACT SUCCESSFULLY CLOSED

LPORB35

✓
AC
95-7760



CSOR0010

MO' II Contact Comments

12/04/1995 10:27:28

Last Name: [REDACTED] VIN: 2FALP74W7RX126232
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:
Dealer: KOONS FORD OF ANNAPOLI Region: 27
CONTACT NBR: 106315696 Date: 12/04/1995 Analyst Code: 1635KP
File Type: LEGAL Time: 10:25:19 Analyst Name: PLAYWIN
Comm Type: F FAX Micro: Letter Code:

Comments:

More?: Y

PER DEALER FAX DATED 11-30-95.
FAX INDICATES THE VEHICLE WAS PARKED IN A PARKING GARAGE. THE VEHICLE
CAUGHT ON FIRE AND BURNED TO THE GROUND PLUS BURNED THE VEHICLE NEXT TO
IT. THERE IS DAMAGE TO THE PARKING GARAGE (AMOUNT UNKNOWN AT THIS TIME).
THE CUSTOMER IS REQUESTING A REPLACEMENT VEHICLE.

PER CONVERSATION WITH OGC, IT WILL BE HANDLED BY THEM.
SENT TO OGC FOR HANDLING.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
#196 FIRST COMMENTS FOR CONTACT

LPORB35

CSOR0010

MO' II Contact Comments

12/04/1995 10:27:35

Last Name: [REDACTED] VIN: 2FALP74W7RX126232
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:
Dealer: KOONS FORD OF ANNAPOLI Region: 27

CONTACT NBR: 106315696 Date: 12/04/1995 Analyst Code: 1635KP
File Type: LEGAL Time: 10:27:16 Analyst Name: PLAYWIN
Comm Type: F FAX Micro: Letter Code:

Comments: More?: N
THIS IS THE CLOSING COMMENT
SENT TO OGC FOR HANDLING.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
1002 REQUESTED INFORMATION DISPLAYED LPORB35

DEALER REQUEST FOR LEGAL/OFFICE of the GENERAL COUNSEL CONTACT
(Fax to 313-446-9471, ATTN: Kathy Flaydla)Requesting Dealer KOONS FORD of ANNAPOLIS 00089 Phone 410-224-4086Contact Person DAVE SPARROW Fax No. 410-224-4086New Used Date of Purchase 2-28-95 Model 1994 CROWN PERVICVIN 2FALP74W7RX126232Customer Name [REDACTED]Address [REDACTED]EDGEWATER MARYLANDHome Phone [REDACTED] Business Phone [REDACTED]Incident Involves: Accident ☐ Fire ☒ Warranty ☐ Sudden Acc ☐If customer is alleging product defect, what type CAUSE OF
FIREAny Property damage (other than vehicle)? ☒ no type BURNED ANOTHER VEHICLEAny Personal injury? yes ☐ no ☒ Was medical attention sought? yes ☒ no ☐Was a police report filed? yes ☒ no ☐ (If yes, where?) FIRE DEPARTMENT
REPORT FILEDName and phone of owner's insurance company (agent's name) GEICO (NO AGENT NAME) 1-800-841-3000Has the insurance co. been contacted? ☒ yes ☐ noIf vehicle is a conversion unit, name of body builder NAAccident details (date, where, how, etc.) NOV. 28, 1995 IN
PARKING GARAGE IN ALEXANDRIA, VIRGINIA.ADJACENT TO 1801 N. BEAUREGARD ST. VEHICLEBURNED TO GROUND PLUS BURNED ANOTHER VEHICLE.DAMAGE TO PARKING GARAGE UNKNOWN AT THIS TIME.What is the customer requesting? A REPLACEMENT VEHICLE.

IF NEEDED, PROVIDE ADDITIONAL COMMENTS ON A SEPARATE SHEET OF PAPER

For confirmation use only: Case tracking # 100315810☐ Case has been opened and will be handled by Customer Affairs.
☐ Case has been assigned to AAA for investigation.
☐ Case has been forwarded to the Office of the General Counsel for handling.VEHICLE CURRENTLY AT A STORAGE LOT AT 5300 EISENHOWER
AVE.
ALEXANDRIA,
VIRGINIA

CSOR0016

MORS II Legal Contact

03/24/1997 08:16:02

WASHINGTON 27 Zn/Tr: C1 M/A: CONTACT NBR: 106315696 Opened: 12/04/1995
VIN: 2FALP74W7RX126232 *SCORE* 000 Closed: 12/04/1995
Last Name: [REDACTED] Status: CLOSED
Title: [REDACTED] First Name: [REDACTED] MI: [REDACTED]
Address: [REDACTED]
City: EDGEWATER ST/PV: MD Zip/PC: [REDACTED] CC: USA
Home Phone: [REDACTED] Business Phone: [REDACTED] Ext: [REDACTED]
Year: 94 Model: CROWN VICTORIA
Mileage/Km: 1 WSD: 02/28/1995

Dealer Name: KOONS FORD OF ANNAPOLI Sales Code: 127418 P&A: 00089
Causal Code: 02 Symptoms: 704100
Serv Sales: 1 (1 or 2) Origin: GO Trans Date:
Veh Repl:
Case Type: 4A FIRES - ELECTRICAL Means Code: B LGL INVEST-WTY-ATTY LETTE
Atty Name: Atty Memo:
Claimed Amt: Award Amt:
CANADA ONLY:
Court Code: Award Code:

F1=HELP F3=EXIT F4=COMMENT F5=ADD F6=UPD F9=CLOSE F12=CANC
I053 REQUESTED CONTACT DISPLAYED

OGDB140

CSOR0010

' 78 II Contact Comments

03/24/1997 08:16:19

Last Name: [REDACTED] VIN: 2FALP74W7RX126232
Home Phone: [REDACTED] Bus. Phone: [REDACTED] Ext:
Dealer: KOONS FORD OF ANNAPOLI Dist/Reg: 27
CONTACT NBR: 106315696 Date: 12/04/1995 Analyst Code: 1635KP
File Type: LEGAL Time: 10:25:19 Analyst Name: PLAYWIN
Comm Type: F FAX Micro: Letter Code:

Comments:

More?: Y

PER DEALER FAX DATED 11-30-95.

FAX INDICATES THE VEHICLE WAS PARKED IN A PARKING GARAGE. THE VEHICLE
CAUGHT ON FIRE AND BURNED TO THE GROUND PLUS BURNED THE VEHICLE NEXT TO
IT. THERE IS DAMAGE TO THE PARKING GARAGE (AMOUNT UNKNOWN AT THIS TIME).
THE CUSTOMER IS REQUESTING A REPLACEMENT VEHICLE.

PER CONVERSATION WITH OGC, IT WILL BE HANDLED BY THEM.
SENT TO OGC FOR HANDLING.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO
E196 FIRST COMMENTS FOR CONTACT

OGDB140

CSOR0010

38 II Contact Comments

03/24/1997 08:16:24

Last Name:

Home Phone:

Dealer:

KOONS FORD OF ANNAPOLI

Bus. Phone:

VIN: 2FALP74W7RX126232

Ext:

Dist/Reg: 27

CONTACT NBR: 106315696

Date: 12/04/1995

Analyst Code: 1635KP

File Type: LEGAL

Time: 10:27:16

Analyst Name: PLAYWIN

Comm Type: F FAX

Micro:

Letter Code:

Comments:

More?: N

THIS IS THE CLOSING COMMENT

SENT TO OGC FOR HANDLING.

F1=HELP F3=EXIT F5=ADD F7=PREV F8=NEXT F11=CANC LTR F12=BASIC INFO

1002 REQUESTED INFORMATION DISPLAYED

OGDB140

Ford Motor Company Service Bay Products

Vin: 2FALP74W7RX126232 Date: September 02, 1998 Time: 1:46:43 pm

Vehicle Information

Veh:1994 CROWN VICTORIA Body:4 DR SEDAN LX
Engine:4.6L SOHC (ROMEO) Calif:418GR00A Trans:4 SPD OD AODE AXLE CODE: GY

Warranty Information

Start Date:February 28, 1995 Build Date:November 30, 1993 Start Mileage

*Open Recalls

- NO CAMPAIGN MESSAGE(S) FOUND

Vehicle Repair History

LESS THAN TWO DEALER APPROVED AWA REPAIR VISITS PAID TO DATE

HO *EXTENDED SERVICE PLAN

Extended Service Plan

NO ESP INFORMATION AVAILABLE

NO REPAIR HISTORY ON VEHICLE

Service Bay Products service_bay@fordstar.ford.com



2640 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-6550, WASHINGTON 261-8220
DIRECT LINE 286-3067

P & A CODE 00089

P & A CODE 00089	
REPAIR 1	
REPAIR 2	
REPAIR 3	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (NO TENTHS)
DATE	MILEAGE (NO TENTHS)
DATE AND MILEAGE AT TIME OF VEHICLE RETURN	
DATE	MILEAGE (NO TENTHS)
DATE	MILEAGE (NO TENTHS)

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒

00080398

TAG: 9637 I P RO: IB4907-9

2FALP74W7RX126232 DK RED/MAR

94 FORD CROWN VIC LX 4DR SDN

INVOICED AT: 12/10/93 10:10:07

PROD: 113093

STK#: 000R0398 5020

DATES: BEGIN: 120893 DONE: 121093

ADV: 765 DC: 1FA

ODOMETER IN: 4

TX: 1

LN	PDI	TECH 749 LAB HRS	1.7	68.85
SI	PDI			
	PDI			
		SELBY, JOSEPH		
		OP-PDI		
				0
				68.85
				68.85
		LAB-MECHANICAL		68.85
		TOTAL CHARGES		68.85
		INTERNAL		68.85

LAB RATE: 54.00
INTERNAL

MS

PAGE 1 OF 1

CUSTOMER PAY ☐ WARRANTY ☐ INTERNAL ☐ PARTS DISPOSAL: RETURN ☐ CREDIT CARD ☐

CUSTOMER'S RIGHTS

1. CUSTOMER WANTS REPLACED PARTS IF NOT RETURNABLE UNDER WARRANTY, YES ☐ NO ☐
2. DO YOU WANT A WRITTEN ESTIMATE SINCE IT EXCEEDS \$50. YES ☐ NO ☐
3. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN 10% OF THE COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT.
4. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES ☐ NO ☐

CUSTOMER'S SIGNATURE _____

REPAIRS CHARGED FOR WHEN NEEDED AND PERFORMED. ALL PARTS LISTED ARE NEW UNLESS IDENTIFIED USED OR A RESULT. LABOR CHARGES ARE COMPUTED BY FLAT RATE UNLESS OTHERWISE SPECIFIED. CUSTOMER LABOR CHARGES ARE BASED ON THE RATE OF _____ PER HOUR.

WARRANTY POLICY
 1. We warrant the repair work performed on your vehicle for a period of 12 months or 100,000 miles, whichever comes first. This warranty is void if the vehicle is used for racing or other illegal purposes. We warrant the parts used in the repair for the life of the vehicle. This warranty is void if the parts are not installed correctly. We warrant the labor performed on the vehicle for the life of the vehicle. This warranty is void if the labor is not performed correctly. We warrant the materials used in the repair for the life of the vehicle. This warranty is void if the materials are not installed correctly. We warrant the finished product for the life of the vehicle. This warranty is void if the finished product is not installed correctly. We warrant the customer's satisfaction for the life of the vehicle. This warranty is void if the customer is not satisfied.

CHARGE LINE	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	26	27	28	29
CHARGE LINE																													
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26																													
27																													
28																													
29																													

VEHICLES LEFT OVER 48 HRS. SUBJECT TO A STORAGE CHARGE \$ 10.00 PER DAY.

PARTS & LABOR WARRANTED 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

ANY CLAIMS ON ADJUSTMENTS MUST BE ACCOMPANIED BY THIS NOTICE.

Type, Performance, Power Drivetrain, Extra Options, Tire Pressure or Release and Personal Arrows MUST be removed before the car is left for service. We are not responsible for items removed.

PAGE 1 OF 1

NOTE: BELOW ON WORK AT THE TIME

1	TECH	OPERATION	HRS
2	OLH	FLG	FAILED PART
3	RC	NET	CND
4	TECH	OPERATION	HRS
5	OLH	FLG	FAILED PART
6	RC	NET	CND
7	TECH	OPERATION	HRS
8	OLH	FLG	FAILED PART
9	RC	NET	CND
10	TECH	OPERATION	HRS
11	OLH	FLG	FAILED PART
12	RC	NET	CND

TECH	OPERATION	HRS
OLH	FLG	FAILED PART
RC	NET	CND
TECH	OPERATION	HRS
OLH	FLG	FAILED PART
RC	NET	CND
TECH	OPERATION	HRS
OLH	FLG	FAILED PART
RC	NET	CND

RD 84907 *TAG 9637* (IC) 000R0398

SVC ADV: 765 BROOK SHOLTS

94 **VIN: 2FALP74W7 RX126232**

FORD CROWN VIC
 LX 4DR SDN
 LICENSE: DK RED/MAR CAR

SVC DLR: 209001

STOCK NUMBER: 000R0398 INV ACCT: 5020

PROD: 113093

CURRENT: 4

DIST CODE: 1FA

12/08/93 14:43:48

255 NOTE: INTERNAL

***PROMISED DATE: 12/08/93 TIME: 1600 ***

MODEL: P74

TAG 9637 **RD 84907** SVC ADV: 765

VIN: 2FALP74W7 RX126232

ER82-825 44883



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8800, WASHINGTON 201-6220
DIRECT LINE 286-3087

P & A CODE 00089

PREPARED BY		DATE	
REPORT 1		TIME	
REPORT 2		MILEAGE	
REPORT 3		OIL	
DATE AND MILEAGE AT TIME OF PREVIOUS RECEIPT		MILEAGE AND TIME	
DATE	MILEAGE	DATE	MILEAGE
DATE	MILEAGE	DATE	MILEAGE
DATE	MILEAGE	DATE	MILEAGE

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OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CABINER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 8:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW X

000R0398

TAQ: 0912 W P RO: 000454-1
2FALP74W7RX126232 DK REG/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 03/21/94 12:05:13
PROD: 113098
STK#: 000R0398 1300

DATES: BEGIN: 031594 DONE: 032194
ADV: 306 DCI: 1FA

ODOMETER IN: 7

TX: 1

94083

LN SPEEDOMETER IN DASH DOES NOT READ: TECH 552 LAB HRS 1.1 57.78
51 OVER 20 MPH : MONK, ANTHONY
LOOSE CONN. : OP-10848A FC-03
DIAG., REPL., HEAD ASSY. : EP-10849 685

PART#FMC F3VY 10849 AR *CLUSTER QTY 1 111.12 111.12
PARTS AMOUNT 155.57
LAB AMOUNT 57.78
LINE TOTAL - DEPT D 213.35

PARTS 155.57
LAB-MECHANICAL 57.78
TOTAL-CHARGES 213.35
FAC WARRANTY 213.35

LAB RATE: 62.00

MV

PAGE 1 OF 1

H 3/28

CUSTOMER PAY ☐ WARRANTY ☐ INTERNAL ☐ PARTS DISPOSAL: RETURN ☐ TERMS: CREDIT CARD ☐

- CUSTOMER RIGHTS**
1. CUSTOMER WANTS REPLACED PARTS IF NOT RETURNABLE UNDER WARRANTY.
YES ☐ NO ☐
 2. DO YOU WANT A WRITTEN ESTIMATE SINCE IT EXCEEDS \$100? YES ☐ NO ☐
 3. CUSTOMER AGREES THAT HE MAY BE CHARGED NOT MORE THAN 15% OF THE COST OF THE WRITTEN ESTIMATE WITHOUT HIS CONSENT.
 4. CUSTOMER CONSENT FOR ADDITIONAL REPAIRS YES ☐ NO ☐

DISCLAIMER
THIS SERVICE CONTRACT IS NOT A WARRANTY. IT IS A CONTRACT. IT DOES NOT GUARANTEE THAT THE VEHICLE WILL BE FREE FROM DEFECTS OR THAT THE VEHICLE WILL BE FREE FROM DEFECTS FOR A PERIOD OF 12 MONTHS. THE VEHICLE IS SOLD AS IS. THE VEHICLE IS NOT TO BE USED FOR RACE OR OTHER ILLEGAL PURPOSES. THE VEHICLE IS NOT TO BE USED FOR COMMERCIAL PURPOSES. THE VEHICLE IS NOT TO BE USED FOR TAXI OR OTHER COMMERCIAL PURPOSES. THE VEHICLE IS NOT TO BE USED FOR RACE OR OTHER ILLEGAL PURPOSES. THE VEHICLE IS NOT TO BE USED FOR COMMERCIAL PURPOSES. THE VEHICLE IS NOT TO BE USED FOR TAXI OR OTHER COMMERCIAL PURPOSES.

CUSTOMER'S SIGNATURE

SALESMAN'S SIGNATURE

DATE

TIME

LOCATION

CHASSIS	ENGINE	TRANSMISSION	DRIVETRAIN	STEERING	SUSPENSION	WHEELS	TIRES	EXHAUST	PAINT	ELECTRICAL	CLIMATE	INTERIOR	EXTERIOR	OTHER	REMARKS
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	

INVOICE

DATE 03/15/94 **TIME** 10:00

TECH 552 **OPERATION** HRS

OLH FLG **FAILED PART**

RC **NET** **CND** **AUTH**

TECH 552 **OPERATION** HRS

OLH FLG **FAILED PART**

RC **NET** **CND** **AUTH**

TECH 552 **OPERATION** HRS

OLH FLG **FAILED PART**

RC **NET** **CND** **AUTH**

TECH 552 **OPERATION** HRS

OLH FLG **FAILED PART**

RC **NET** **CND** **AUTH**

****RD 90454** -1 *TAG 0912* LIC: 000R0398**

SVC ADVI 306 LAURIE HICKEY

94 **VIN: 2FALP74W7 RX126232**

CROWN VIC

4DR SDN

DK RED/MAR CAR

SVC DLR 1209001

INV ACCT 1300

PROD 113093

CURRENT 7

AVG PER DAY: PER MONTH:

MODEL# P74

*****PROMISED DATE: 03/15/94 TIME: 1000*****

DIST CODE: 1FA

03/15/94 11:17:14

0002-025 44685



2540 PIYA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 284-2100, BALTIMORE 841-0550, WASHINGTON 261-8220
DIRECT LINE 886-3087

P & A CODE 00089

PROPRIETARY CODES	
PROJECT	
REPAIR	
DATE	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (SEE NOTE)
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE (SEE NOTE)

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 5:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 8:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW X

000R0398

TAG: 0796 W P RDI 410071
2FALP74W7RX126232 DK 000000
24 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 02/02/95 10:17:10
STK# 000R0398 1000
PROD: 11809

DATES: BEGIN: 013095 DONE: 020195
ADV: 287 DC: 1FA

ODOMETER IN: 37

LN	AMP LIGHT ON	TECH 889 LAB HRS	.7	37.00
51	BATTERY & ALTERNATOR SHORTED			
	ALTERNATOR - REMOVE AND INSTALL	OP-10346A		
	R REPLACE			
LN	ALTERNATOR CIRCUITS (USING VOLTAGE	TECH 889 LAB HRS	.3	14.10
51-1	TER) - TEST			
		OP-10200A		
LN	REPLACE BATTERY	TECH 889 LAB HRS	.3	14.10
51-2				
		OP-10654B		
LN	WIRING ASSEMBLY - REPAIR	TECH 889 LAB HRS	.5	21.50
51-3				
		OP-14200A		

VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE @	EXTENSION
FMC#E9AZ 14526 A	*WIR ASY-F		1	5.61	5.61
FMC#F1VY 10346 B	ALT ASY-		1	152.75	152.75
FMC#F0DZ 10316 A	REGULATOR		1	37.50	37.50
FMC#F1DZ 10347 A	HOLDER &		1	9.70	9.70
FMC BXT 65 450	BATTERY A		15	83.14	1247.10
	PARTS COUNT		5		

PARTS AMOUNT	1247.10
LAB AMOUNT	92.40
LINE TOTAL - DEPT D	1339.50

MG

PAGE 1 OF 2

ERR2-025 44688

DATE

FORD



FORD

2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-6500, WASHINGTON 281-8220
DIRECT LINE 268-3017

P & A CODE 00089

PREVIOUS RECORD	
REPORT 1	
REPORT 2	
REPORT 3	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (NOT TOWNS)
YES	NO
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE (NOT TOWNS)
YES	NO

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THIS PARTS AND LABOR
LISTED BELOW ☒

000R0398

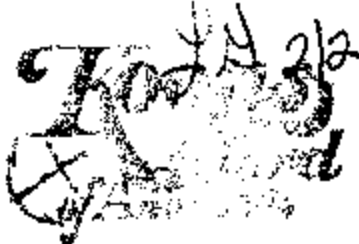
TAG: 0796 W P RD: 410071
2FALP74W7RX126232
94 FORD CROWN VIC LX 4DR GRN
INVOICED AT: 02/02/95 11:17:00

PARTS	662.00
LAB-MECHANICAL	62.00
TOTAL-CHARGES	724.00
TAX WARRANTY	400.00

LAB RATE: 62.00

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. GRESHAM
MG

PAGE 2 OF 2



REPOSAL ☐ RETURN ☐ TERMS ☐ CREDIT CARD ☐

Abstract

- THE UNIVERSITY OF CHICAGO PRESS

DECLAR: I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREIN IS ACCURATE AND TRUE AS
AS DESCRIBED WITHIN AND WAS NOT OBTAINED FROM ANY SOURCE OTHER THAN THE
2 OR OTHERWISE THAT ANY PART THEREOF OR ANY INFORMATION CONTAINED THEREIN HAS BEEN OBTAINED
FROM ANY SOURCE OTHER THAN THE SOURCE OF THE INFORMATION CONTAINED HEREIN OR FROM ANY
PERSON OR PERSONS WHOSE NAMES ARE LISTED IN THE ATTACHED LIST OF NAMES OF PERSONS
WHO ARE KNOWN TO HAVE BEEN IN CONTACT WITH THE SUBJECT OF THIS REPORT.

THE UNIVERSITY OF MICHIGAN LIBRARY

NON CHARGE EQUIVALENT TO 10% OF LABOR CHARGE IS ALLOWED FOR MATERIALS.
 1. APPLICABLE SUPPLY ITEMS ARE NUTS, BOLTS, WASHERS, PINN, AIRSPLAVERS,
 ETC. BATTERY CHARGERS, ETC.

PORD MANT.	NAME ALMAN				
206	207	208	209	210	211

VEHICLE LEFT OVER 48 HRS SUBJECT TO A STORAGE CHARGE @ 10.00 PER DAY

PARTS & LABOR WARRANTED CLOUD MALES OR ONE YEAR FROM DATE WORK WAS PERFORMED

ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE.

Taxes, Transportation, Electric Overclock, Extra Specialist Time Players or Patches and Personal Arrows MUST be ordered before the car is set for service We do not remount for some more.

PG 1 of 1

TEST	OPERATION	HRS
------	-----------	-----

OLK	FLG	FAILED PART
-----	-----	-------------

RC	NET	CND	AUTH
----	-----	-----	------

TECH	OPERATION	HRS
------	-----------	-----

OLH	FLG	FAILED PART
-----	-----	-------------

RC	NE	CND	AUTH
----	---------------	-----	------

TECH	OPERATION	HRS
------	-----------	-----

JUN	F R	FAN ED PART

DATE	FILE	FILED IN
1964	1	1

RL	NET	CND	ADTR

TECH	OPERATION	HRS
------	-----------	-----

OLH	FLG	FAILED PART

RG	NET	CND	AUTH
----	-----	-----	------

94 *#VINI 2FALP74W7 RX126232*

CROWN VIC
4DR SDN

DK RED/MAR CAR
SUC DL 8: 209001

345 SER: 107001
 SER: 000R0398 INV ACCT: 1300
 PROD: 1300

EAST: 7 CURRENT: 37

PER MONTHLY

DIST CODE: 1FA

INFORMATION

• INFORMATION

01/30/95 16:13:13

DATE: 01/30/95 TIME: 1800 ***

WIN: 2FALP74W7 R0126232

WIN: 2FALP74W7 R0126232

FD-302-825

CONDITION CODES:[illegible]

TIME CLOCK

[illegible]



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8560, WASHINGTON 261-8220
DIRECT LINE 268-3067

P & A CODE 00085

VEHICLE INFORMATION	
VEHICLE #	
MAKE	
MODEL	
YEAR	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (NO. THOUSANDS)
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE (NO. THOUSANDS)

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW

[Signature]

EDGEWATER
ANNE ARUNDEL

MD

TAC: 0704 C W P RO: 210109

2TAL: 74W7RX123232 BY: 000000

24 FORD CROWN VIC LX 4DR CDM

INVOICED AT: 06/23/95 14:17:45

LIC: MD 1 STK#: 000000

DATES: BEGIN: 062195 DONE: 062395 INVC: 022095 SOLD: 022095 FROM: 110000

ADVI: 640 DC: 1FA 271411

HOME: WORK: ODOMETER IN: 5073 EX: 1

LN TURN SIGNALS AND A/C INOP SEE CUSH TECH 791 LAB IRS .2

52 T NOTE SANFORD, RO

FUSE MISSING OF 14526A

FUSE - REPLACE CHECK OPERATION OF
AC & SIGNALS COULD NOT VERIFY

VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE @	EXTENDED
FMC-D9ZZ	14526 B	FUSE	2	.27	.54
	PARTS COUNT		2		

PARTS AMOUNT .76

LAD AMOUNT 11.10

LINE TOTAL - DEPT D 11.86

PARTS .76

LAD MECHANICAL 11.10

TOTAL CHARGES 11.86

FAC WARRANTY 11.86

LAD RATE: 64.00

PREFERRED TREATMENT

ATTENTION

CUST-PAY MUST BE PRINTED ALSO

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. PENNELL

NO

PAGE 1 OF 1

KAM 6/23

CONDITION CODES

NUMERIC			SYMPTOM		
Code Description			Code Description		
01 Broken, cracked	21 Loose	41 Worn or misaligned wheel	Engine Condition	Code	Engine Condition
02 Shim, mislead, standard	22 Wrenched	42 Overheating	Backfire	T1	Full Open, Loose
03 Missing	23 Poor fit	43 Allowing wind, part	Density, Pump or	T2	Exhaust Cuts, Brakes
04 Asbestos band - failure or	24 Misaligned, out of position	44 Attached, distorted	Insufficient Fuel Quantity	T3	Exhaust Non-Compliance Carb
05 Excess fuel loaded (spark	25 Unable to adjust	45 Shutter, whistles, out of	Engine Timing		Diag Concern (Cell Drift)
06 Plug only)	26 Wrong part	46 Gasket mislead or sealer	Starting Conditions	Code	Warm
07 Defect, origin, surface	27 Missing part	47 Sealer mislead or sealer	Will Not Start	J1	L1
08 Defect (where noted only)	28 Corruption of component	48 Pudding sealer part, km	Coarse, Not Hot Start	J2	L2
09 Improper act, part	29 Gaskets, leaks, gaskets, seals	49 Only	Coarse, Hard To Start	J3	L3
10 Chisel/only)	30 Ignition/ly noted	50 Chipped, scratched (glass	Unnecessary Idle Chatter		
11 Blown (spindle)	31 Loose connections	51 Collapsed	Idle People	J4	L4
12 Improper setting (soft arm	32 (electrical only)	52 Exhaust leak	Idle Too Fast	J5	L5
13 Only)	33 External water / coolant leak	53 Flat tire	Star Return To Idle	J6	L6
14 Underline	34 Burned out, shorted	54 Vacuum leak	Stalls, Cuts		
15 Improper vehicle attitude	35 Grounded (electrical only)	55 Blower, sealing	After Starting	J7	L7
16 (refrigerant only)	36 Ignored water / coolant leak	56 Substituted (glass only)	Upon Initial Drive Engagement	J8	L8
17 Out of round	37 Leaks - other	57 Oil leak	At Idle Or While Stopping	J9	L9
18 Surface uneven, rough,	38 Def, design standards	58 Handheld - part out	While Driving	K1	M1
19 scratched, scored	39 Double vision (glass only)	59 Inoperable secondary	Accelerator, Handles Upon Acceleration	K2	M2
20 W/ and hold change	40 Improperly made or fixed	60 Clutch or parking brakes	Shocks, Bumps, Jerks, Noise		
21 (primary only)	41 Poor performance	61 Brakes, jammed, locked,	While Accelerating	K3	M3
22 Overline	42 Attaching standard part	62 disconnected	At Steady Speed	K4	M4
23 Hole rectangular or oval	43 Inward dropped	63 Gaps, slips on or gear	Upon Deceleration	K5	M5
24 Hole out of position	44 Plugged, restricted	64 Rapid, corrected	Loose Power	K6	M6
25 Through the top	45 Loose, settles, separates	65 Flogged, heavy (glass only)	Unusual Engine Noise		
26 Through center	46 Attaching standard part	66 Teeth damaged or worn	Spark Knock	K7	M7
27 Through flange side rim	47 Loose	67 Too big	Other Unusual Noise	K8	M8
28 Only)	48 Attaching standard part	68 Too small			
29 (unwashed)	49 Inward	69 Burn of record			
30 Seals broken	50 Attaching standard part	70 Improper wheel balancing			
31 Poor vehicle	51 Attaching standard part	71 Damaged wheels or			
32 Discoloring (glass only)	52 Attaching standard part	72 Discoloring only			
33 Wrenched	53 Allowing standard part	73 Cracked (glass) (sealer)			
34 Hole in part	54 Along / short	74 Weld broken			
35 Glass (front piece only)	55 Weld broken	75 Attaching standard part			
36 G/L torn	56 Attaching standard part	76 Wrong part			
37 Excessive wear	57 Worn, sagged	77 Work, sagged			
38 Hole across					
39 Broken					

PANT DEFECTS
Applicable to Colortrust Only

A1	Oil in paint	A6	Free software on surface	B3	Beaver, beaverer (verb)
A2	Overplay	A7	Bulky, tarnished, faded	B4	Beaverer produces a wall
A3	Thin, no paint	A8	Displaced	B7	Beaverer produces a wall
A4	Edge, rust, drip	A9	Beakers, blazers, pop-ups	B8	Beak calculator from door
A5	Color marbles, middle	A9	Chalking, chalking	B9	Beak calculator from door
	poor brush technique	B1	Cracked, cracked paint	C1	Beak from glass, scanner
		B2	Cracks paint, cracking, old paint	C2	Beak from window surface, e.g., door handle
				C3	Paint - wrong color (asked: vehicles only)

Applicable to Participants Only

231	Des at primer	236	Crossing, self primer	239	Red wavy, 1st map
232	Gelbige, blasse pup-ups	237	Common perforation	240	Red, paralyzing body parts
233	Singular, disactive under primer	238	Light run on surface	241	Gravied, chevron pinne
234	Reds to Luch, same				

PAINT DAMAGE
ARSENIC MATERIAL (ENVIRONMENTAL FALLOUT) FLUX DROPPINGS

B5	Binary acid damage injection.	C6	Acid injury (acidosis) and tox and other exposure injection	D6	Binary acid through inhaler
B6	Other interdependence have damage	C7	Other (radio) injury of p.m.		
C4	Water spilling gasoline and soil				

Symptom

Applicable to Extremity Conditions Only

Engine Condition	Code	Engine Condition	Code
Backfire	T1	Fuel Door, Leaks	T4
Deposit, Heavy on	T2	Exhaust Cocks, Stuck	T5
Unsatisfactory Fuel Economy	T3	Exhaust Non-Compliance Carb	T6
		Also Concern Cold, Drifts	T7

	Engine Timing		
	Cold	Warm	Hot
Starting Driveshafts			
Wet Mix Coals	J1	2.1	R11
Coals, Wet Not Start	J2	1.2	R2
Coals, Hard To Start	J3	1.3	R3
Unsuccessful Mix Drifts			
Wet Pile	J4	1.4	R4
Wet Test Post	J5	1.5	R5
Wet Return To Mix		1.6	

Wipe Clute			
Wipe Searing	J7	L7	N7
Upon Initial Drive Engagement	J8	L8	N8
At End Of Wipe Searing	J8	L8	N8
Wipe Driving	K1	M1	P1
Shunters, Handstops Upon Acceleration	K2	N2	P2
Signal, Buckle, Jerk, Noise			
Wipe Accelerating	K3	M3	P3
At Steady Speed	K4	M4	P4
Upon Deceleration	K5	M5	P5
Lack of Power	K6	M6	P6
Unusual Engine Noise			
Spark Knocks	K7	M7	P7
Other Unusual Noise	K8	M8	P8

Applicable to Wheel Alignment Conditions Only

Dist, Full, Member	402	Time used	
Clear Vision	403	Align to input within specifications	76
		Time used	
		Align output of specifications	76

FLADDO

3A Broken, cracked	4D Loose connections	5E Damaged insulation
3G Hole in part	4F Burned out, broken	5F Exposed circuits
3H Open circuit	4G Grounded	5G Damaged terminals
	5F Noisy, rattle, buzz, etc.	

PART NAMES

ALBAN	The balance (at) line condition code 90	BRAND	Brand selected - Use condition code 83
FRML	The balance (first) line condition code 82	BRNDM	Brand length and control plane integrity expressed for localization
FRMLN	The balance (many) line condition code 82	SHRTEL	Short line working case - means position or repositioning meaning what is the case vehicle - use condition code 103
FRONT	Front and argument only line condition code 94, 95 or 96		
RTCE	Flare case		
TIME	The type or replacement		
ALTBELT	Alternator belt	GRILL	Exterior grille assembly
POWERBELT	Power steering belt	GRILL	Exterior grille assembly
ALTBELT	Alternator belt	WED	Front of truck body
AMPBELT	Amper pump belt	CAB	Cab or truck body
WHEELBELT	Wheel pump belt		Exterior (in position)
FRECON	Air conditioner (refrigerant)		
ENTIRE	This entry when the entire unit or a major portion of (parts or more) of an unit is used or replaced		
ALGOB	Additional data system display or entry (repeated during basic vehicle entry)		
DRAG	EEC (Emission Control) and other data (entry) (repeated during basic vehicle entry)		

AT THE DELIVERY ONLY

ANTI	Antibiotic loaded	AGR	Power steering fluid
FLU	Fluorescent dye	EDL	Blow lead
FWASH	Fluid added to washer to wash in reservoir	EDN	Engine oil
		EDL	Electric load
RAISAI	Fluid added to raise washer reservoir	SCIL	Sealing compound
		TDL	Anti-infectant fluid

TIME CLOCK

[illegible]



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
 ANNAPOLIS 224-2100, BALTIMORE 541-6550, WASHINGTON 261-8220
 DIRECT LINE 265-9067

P & A CODE 00089

1. PREVIOUS DAMAGE	
DATE	DESCRIPTION
DATE	DESCRIPTION
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE AND MILEAGE
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE AND MILEAGE

PLEASE RETAIN THIS COPY AS
 YOUR SERVICE RECORD. ANY
 CLAIMS OR ADJUSTMENTS
 MUST BE ACCOMPANIED BY
 THIS INVOICE AND MUST
 BE MADE WITHIN 12,000 MILES
 OR ONE YEAR FROM DATE
 WORK WAS PERFORMED.

SERVICE HOURS:
 MONDAY THRU FRIDAY
 7:30 AM TO 6:00 PM
 CASHIER AND CUSTOMER PICK-UP
 7:30 AM TO 7:00 PM
 SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
 THE PARTS AND LABOR
 LISTED BELOW ☒

TAG# 0427 C RO# 00000000	
2FALP74W7RX126232 BK 54000000	
74 FORD CROWN VIC LX 4DR SDN	
INVOICED AT# 09/06/95	STK# 00000396
LIC# MD 1	INSVC# 022895 SOLD# 022895
PROD# 110000	ODOMETER IN: 9870
EDDSWATER ANNE ARUNDEL BATES# BEGIN# 090695 DONE# 090695 ADV# 287 DC# 1FA HOME# WORK#	

LN	10K SERVICE	TECH 707	S	11.00
31	COMPLETED SERVICE	OP-10K	REED, DERICK L.	
VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE @ EXTENDED
FMD FL 820	FILTER		1	8.63
FMC XO SW30 QSP	MOTOR		5	3.31
PARTS AMOUNT				25.15
LAB AMOUNT				11.00
SERVICE SPECIAL ADJUST				11.00
LINE TOTAL - DEPT D				24.00
PARTS				25.15
SUPPLIES				11.00
LAB-MECHANICAL				11.00
SERVICE SPECIAL ADJUSTMENT				11.00
SUB-TOTAL				27.00
TAX				2.00
TOTAL-CHARGES				29.00
VISA 004014				29.00
VISA / / / / MASTERCARD / / / /				
LAB RATE# 64.00				

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. GRESHAM



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-0650, WASHINGTON 281-8220
DIRECT LINE 206-3067

P & A CODE 00089

PROGRAM EDITOR	
DATE	
TIME	
VEHICLE	
MILEAGE	
OIL AND FILTER	
WASH AND WAX	
TIRE ROTATION	
FLUIDS	
BATTERY	
BRAKES	
STEERING	
SALES	
FINANCE	
TOTAL	

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW

X *W. J. S. Jr.*

[Redacted]

TAG: 0427 C P RO: C22336-
2FALP74W7RX126232 DK RED/MA

94 FORD CROWN VIC LX 4DR SDN

EDGEWATER
ANNE ARUNDEL

MD [Redacted]

INVOICED AT: 09/06/95 09:52:09

DATES: BEGIN: 090695 DONE: 090695 INSV: 022895 SOLD: 022895 PROD: 113093

ADV: 287 DC: 1FA

HOME: [Redacted] ODOMETER IN: 9870 TX: 1

WORK: [Redacted]

LN	10K SERVICE	TECH 707	S	11.60
*31	COMPLETED SERVICE		REED, DERICK L.	
		OP-10K		
VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE & EXTENDED
FMC FL 820	FILTER NG		1	8.63 8.63
FMC XO SW30 GSP	MOTOR OIL		5	3.31 16.55
PARTS AMOUNT				25.18
LAB AMOUNT				11.60
SERVICE SPECIAL ADJUST				11.63
LINE TOTAL - DEPT D				24.95

PARTS	25.18
SUPPLIES	2.32
LAB-MECHANICAL	11.60
SERVICE SPECIAL ADJUSTMENT	11.63
SUB-TOTAL	27.27
TAX	.79
TOTAL-CHARGES	28.05
CASH DUE	28.05

LAB RATE: 64.00

IF YOU HAVE ANY QUESTIONS - PLEASE SEE TROY V. GRESHAM

MG

PAGE 1 OF 2

CONDITION CODES

NUMERIC			SYMPTOM		
Code Description			Applicable to Drivability Conditions Only		
01	Engine, cracked	33	Low	Engine Condition	Code
02	Valve, twisted, bent	34	Widened	Engine Condition	Code
03	Timing, incorrect	35	Poor fit	Engine Condition	Code
04	Adjuster band - tight or loose	36	Maladjusted, out of position	Engine Condition	Code
05	Scrub, fuel forced (scout plug only)	37	Unable to adjust	Engine Condition	Code
06	Clutch, slips, surface defects (clutch pedal only)	38	Wrong part	Engine Condition	Code
07	Improp. adj. (not drivability)	39	Missing part	Engine Condition	Code
08	Exhaust operation	40	Excessive oil consumption	Engine Condition	Code
09	Improp. timing (not in only)	41	Slacks, binds, gears, seized	Engine Condition	Code
10	Unstable	42	Impassive	Engine Condition	Code
11	Unstable	43	Impassive	Engine Condition	Code
12	Improp. vehicle attitude (drivability only)	44	Loose connections (electrical only)	Engine Condition	Code
13	Oil at head	45	External water / coolant leak	Engine Condition	Code
14	Surface uneven, rough, scratched, scored	46	Burned out, cracked	Engine Condition	Code
15	Will not hold charge (battery only)	47	Grounded (electrical only)	Engine Condition	Code
16	Overheat	48	Internal water / coolant leak	Engine Condition	Code
17	Not in proper position	49	Leaky - other	Engine Condition	Code
18	Not in proper position	50	Defect, foreign material	Engine Condition	Code
19	Not in proper position	51	Double vision (glass only)	Engine Condition	Code
20	Not in proper position	52	Insufficient fuel or fluid	Engine Condition	Code
21	Not in proper position	53	Poor performance	Engine Condition	Code
22	Not in proper position	54	Attaching standard part	Engine Condition	Code
23	Not in proper position	55	Fixed type	Engine Condition	Code
24	Not in proper position	56	Plugged, restricted	Engine Condition	Code
25	Not in proper position	57	Water, rattle, squeals	Engine Condition	Code
26	Not in proper position	58	Attaching standard part	Engine Condition	Code
27	Not in proper position	59	Attaching standard part	Engine Condition	Code
28	Not in proper position	60	Attaching standard part	Engine Condition	Code
29	Not in proper position	61	Attaching standard part	Engine Condition	Code
30	Not in proper position	62	Attaching standard part	Engine Condition	Code
31	Not in proper position	63	Attaching standard part	Engine Condition	Code
32	Not in proper position	64	Attaching standard part	Engine Condition	Code
33	Not in proper position	65	Attaching standard part	Engine Condition	Code
34	Not in proper position	66	Attaching standard part	Engine Condition	Code
35	Not in proper position	67	Attaching standard part	Engine Condition	Code
36	Not in proper position	68	Attaching standard part	Engine Condition	Code
37	Not in proper position	69	Attaching standard part	Engine Condition	Code
38	Not in proper position	70	Attaching standard part	Engine Condition	Code
39	Not in proper position	71	Attaching standard part	Engine Condition	Code
40	Not in proper position	72	Attaching standard part	Engine Condition	Code
41	Not in proper position	73	Attaching standard part	Engine Condition	Code
42	Not in proper position	74	Attaching standard part	Engine Condition	Code
43	Not in proper position	75	Attaching standard part	Engine Condition	Code
44	Not in proper position	76	Attaching standard part	Engine Condition	Code
45	Not in proper position	77	Attaching standard part	Engine Condition	Code
46	Not in proper position	78	Attaching standard part	Engine Condition	Code
47	Not in proper position	79	Attaching standard part	Engine Condition	Code
48	Not in proper position	80	Attaching standard part	Engine Condition	Code
49	Not in proper position	81	Attaching standard part	Engine Condition	Code
50	Not in proper position	82	Attaching standard part	Engine Condition	Code
51	Not in proper position	83	Attaching standard part	Engine Condition	Code
52	Not in proper position	84	Attaching standard part	Engine Condition	Code
53	Not in proper position	85	Attaching standard part	Engine Condition	Code
54	Not in proper position	86	Attaching standard part	Engine Condition	Code
55	Not in proper position	87	Attaching standard part	Engine Condition	Code
56	Not in proper position	88	Attaching standard part	Engine Condition	Code
57	Not in proper position	89	Attaching standard part	Engine Condition	Code
58	Not in proper position	90	Attaching standard part	Engine Condition	Code
59	Not in proper position	91	Attaching standard part	Engine Condition	Code
60	Not in proper position	92	Attaching standard part	Engine Condition	Code
61	Not in proper position	93	Attaching standard part	Engine Condition	Code
62	Not in proper position	94	Attaching standard part	Engine Condition	Code
63	Not in proper position	95	Attaching standard part	Engine Condition	Code
64	Not in proper position	96	Attaching standard part	Engine Condition	Code
65	Not in proper position	97	Attaching standard part	Engine Condition	Code
66	Not in proper position	98	Attaching standard part	Engine Condition	Code
67	Not in proper position	99	Attaching standard part	Engine Condition	Code
70	Not in proper position	100	Attaching standard part	Engine Condition	Code
71	Not in proper position	101	Attaching standard part	Engine Condition	Code
72	Not in proper position	102	Attaching standard part	Engine Condition	Code
73	Not in proper position	103	Attaching standard part	Engine Condition	Code
74	Not in proper position	104	Attaching standard part	Engine Condition	Code
75	Not in proper position	105	Attaching standard part	Engine Condition	Code
76	Not in proper position	106	Attaching standard part	Engine Condition	Code
77	Not in proper position	107	Attaching standard part	Engine Condition	Code
78	Not in proper position	108	Attaching standard part	Engine Condition	Code

[illegible]



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100. BALTIMORE 841-5550. WASHINGTON 281-8220
DIRECT LINE 286-9087

P & A CODE 00089

PROOF OF SERVICE	
REPORT 1	DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT
REPORT 2	DATE
REPORT 3	DATE
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (NO ENTRY)
NO	YES
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (NO ENTRY)
NO	YES

PLEASE RETAIN THIS COPY AS
YOUR SERVICE RECORD. ANY
CLAIMS OR ADJUSTMENTS
MUST BE ACCOMPANIED BY
THIS INVOICE AND MUST
BE MADE WITHIN 12,000 MILES
OR ONE YEAR FROM DATE
WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICKUP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW X

EDgewater MD
ANNE ARUNDEL
DATES: BEGIN: 030995 DONE: 031095 INVC: 022895 SOLD: 022895 PROD: 113093
ADV: 946 DC: 1FA
HOME: ODOMETER IN: 93 TX: 1

TAG: 3909 C P RO: C12565-3
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SUN
INVOICED AT: 03/10/95 13:20:00
LIC: MD STK#: 1000R0398 1300
27H#18

LN	VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE	EXTENDED
51	FMC*F3AZ -19A361 C	KIT ELECT	TECH 134	1	185.38	185.38
PARTS AMOUNT						185.38
LAB AMOUNT						186.00
LINE TOTAL - DEPT D						371.38

LN	DESCRIPTION	NOTE	QTY	PRICE	EXTENDED
52	INSTALL AUTO ARMOR PROT. PKG.	TECH 500	9	484.55	484.55
LAB AMOUNT					484.55
LINE TOTAL - DEPT D					484.55

PARTS	185.38
LAB-MECHANICAL	670.55
SUB-TOTAL	855.93
TAX	9.27
TOTAL-CHARGES	865.20
CHECK RECEIVED	865.20

LAB RATE: 62.00
PREFERRED TREATMENT

DW

PAGE 1 OF 3

*Paid Visa
3/10/95 SB*

CONDITION CODES

明倫彙編

Code	Description	Code	Description	Code	Description
01	Belted, crushed	33	Lower	64	Welds or solder omitted
02	Bent, kinked, buckled	34	Weldless	65	Overburning
03	Burning	35	Power fit	66	Attaching strand part
04	Adhesive band - failure or separation	36	Misaligned, out of position	67	Welds, corroded
05	Crack, hot fused (spoke parts only)	37	Unfit to adjust	68	Shrink, vibration, out of balance
06	Cracks, dips, surface defects (spoke metal only)	38	Wrong part	69	Spoke cracked or solder strain
07	Improper adj. (not crimping)	39	Wrong part	70	Flashing shield (not too much)
08	Exotic material	40	Improper ad consumption	71	Cracked, scratched (spoke only)
09	Improper sewing (not too much)	41	Shells, shells, gaps, pulled	72	Cracked
10	Unusable	42	Impassive	73	Crack, leak
11	Improper splice electric (not too much)	43	Improperly joined	74	Fast lock
12	Improper splice electric (not too much)	44	Latent connections	75	Maximum lock
13	Out of spec	45	Subsided wire (not too much)	76	Shrink, pulling
14	Surface kinks, rough, scratched, scored	46	General test, altered	77	Shrink (spoke only)
15	Wet and high charge (battery only)	47	General test, altered	78	Oil lock
16	Overrun	48	Locks - other	79	Handset - dried out
17	High impedance or omitted	49	Dist. sample material	80	Improper assembly
18	Weld out of position	50	Direct vision (spoke only)	81	Change or playing with
19	Through stopped	51	Insufficient hole or hole	82	Weld, scratched, later, discarded
20	Through welded	52	Plate connections	83	Spoke, shot out of gear
21	Through welding (not too much)	53	Attaching standard part	84	Spoke, damaged
22	Unusable	54	Attaching standard part	85	Spoke, bent (spoke only)
23	Before broken	55	Spoke, damaged	86	Spoke, bent (spoke only)
24	After welding	56	Spoke, damaged	87	Spoke, bent (spoke only)
25	Damage (spoke only)	57	Spoke, damaged	88	Spoke, bent (spoke only)
26	Weldless	58	Attaching standard part	89	Spoke, bent (spoke only)
27	Weld in part	59	Attaching standard part	90	Spoke, bent (spoke only)
28	Open (not, electrical only)	60	Attaching standard part	91	Spoke, bent (spoke only)
29	Call, test	61	Attaching standard part	92	Spoke, bent (spoke only)
30	Complete wear	62	Attaching standard part	93	Spoke, bent (spoke only)
31	Call, wear	63	Attaching standard part	94	Spoke, bent (spoke only)

PANT DEFECTS
Available in Colours Only

A1	Shirt in pants	A6	T-shirt active in service	B3	Shower, shower unit
A2	Downing	A7	Shirts, knitted, tops	B4	pool
A3	Thin, air panel		shorts	B7	Swimsuit protective suit
A4	Socks, socks, socks	A8	Swimsuits, one-piece	B9	Swimsuit, one-piece
A5	Swimsuit, one-piece	A9	Swimsuit, one-piece	C1	Swimsuit, one-piece
	Swimsuit, one-piece	B1	Swimsuit, one-piece	C2	Swimsuit, one-piece
	Swimsuit, one-piece	B2	Swimsuit, one-piece	C3	Swimsuit, one-piece
	Swimsuit, one-piece		Swimsuit, one-piece		Swimsuit, one-piece

Available in German and French

01	D41 is primer	06	Grading, self primer	08	Feed ending trip signal
02	Substation, bridges, 800-ups	07	Corrosion protection	09	Feed perforating body part
03	Stapler, dishwasher	08	Light rep. on machine	10	Charged, charged primer
04	primer				
05	Dials to home switch				

PARTY DAMAGE
ARIZONA NATIONAL ENVIRONMENTAL ALLIANCE FLUID DAMAGE

23	Battery acid leakage (surface)	25	Acid staining (includes acid oils and other abrasives)	26	Battery acid through prime
24	Other transportation fluid leakage	26	Metals ground fittings in joint		
24	Water spilling (includes water vapor)				

205-SR08752

SYMPTOM

Appendix to Responsibility Conditions One

Engine Condition	Cost	Engine Condition	Cost
Specifiers	T1	Fast Oiler, Lewis	T4
Minimo, Wren on	T2	Edwards Oiler, Grady	T5
Minimally satisfactory Fuel Economy	T3	Edwards Mini-Compressor Cost	T6
		One Oiler, Cost of Fuel	T7

	Single Times		
	Lat	West	Sub
Starting Distance			
FW Not Count	11	11	BT
Crack, NW Not Count	32	12	NS
Crack, NW Not Count	15	13	NS
Crack, NW Not Count			
Satisfactory Ice Quality			
How Thick	24	14	NS
How Fast	30	10	NS
How Safe To Use		10	
State, Rule			
After Reading	47	17	NS
How Many Have Engaged	30	10	NS
At 10 To 15 Miles Away	30	10	NS
While Reading	41	11	NS
Knowledge, Exchange Upon Application	42	12	NS
Support, State, State, State			
As Accompanied	42	12	NS
At 10 To 15 Miles Away	42	12	NS
How Accurate	42	12	NS
Local Power	40	10	NS
Present Engine Water			
Spent Money	47	17	NS
Other Unusual Notes	40	10	NS

Applicable to Water-Saturated Conditions Only

Trk, Pd, Winder	952	The water	
Doc Water	953	Adjusted with application	954
		The water	
		Adjusted with application	955

WSP

DA	Brain, crushed	ED	Liver, homogenized	EH	Myocardial homogenate
DB	Brain in situ	EF	Spleen, rat, homogenized	EL	Cerebral homogenate
DC	Spleen, sheep	EE	Brain, sheep, homogenized	EM	Homogenized muscle

FAST NUMBER

[illegible]

姓名: _____ 性别: _____ 年龄: _____
 职业: _____ 住址: _____
 联系电话: _____ 电子邮箱: _____
 身份证号: _____

ENTIRE	- Live only when the entire soil or a major portion (4 parts or more) of an entire soil is required.
ALSOX	- Add back broken material (shards, etc.) to rapidly draining bank vehicle assembly.
Also	- Add coarse sand to avoid draining bank vehicle assembly.

AT THE NEW YORK CITY

ANTY	- Anti-siphon system	AGE	- Power steering fluid
FUEL	- Gasoline pump	WFL	- Water field
FRONT	- Front wheel in vehicle	COL	- Engine oil
	- engine controls	COL	- Chevrolet L30
FRONT	- Front wheel in rear wheel	COL	- Steering gear tube
	- front	COL	- An transmission belt in

TIME CLOCK[illegible]



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8550, WASHINGTON 261-8220
DIRECT LINE 266-5087

P & A CODE 00080

PREPARED BY		DATE	
PERFORMED BY		DATE	
REPORT		DATE	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT			
DATE		MILEAGE	
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE			
DATE		MILEAGE	

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WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
THE PARTS AND LABOR
LISTED BELOW ☒



TAG: 0704 C W RO: C18189-6
2FALP74W7RX126232 DK RED/MAR
94 FORD CROWN VIC LX 4DR SDN
INVOICED AT: 06/23/95 19:03:34

EDGEWATER

MD

IF YOU HAVE ANY QUESTIONS - PLEASE SEE KARL R. PENNELL



KCM

PAGE 2 OF 3

ER02-025 44702



2540 RIVA ROAD ANNAPOLIS, MARYLAND 21401
ANNAPOLIS 224-2100, BALTIMORE 841-8880, WASHINGTON 261-8220
DIRECT LINE 266-8087

P & A CODE 00089

PROGRAM CODE	
REPORT	
REPORT	
REPORT	
DATE AND MILEAGE AT TIME OF VEHICLE RECEIPT	
DATE	MILEAGE (NO TENTHS)
DATE	MILEAGE
DATE AND MILEAGE AT TIME OF VEHICLE RELEASE	
DATE	MILEAGE (NO TENTHS)
DATE	MILEAGE

PLEASE RETAIN THIS COPY AS YOUR SERVICE RECORD. ANY CLAIMS OR ADJUSTMENTS MUST BE ACCOMPANIED BY THIS INVOICE AND MUST BE MADE WITHIN 12,000 MILES OR ONE YEAR FROM DATE WORK WAS PERFORMED.

SERVICE HOURS:
MONDAY THRU FRIDAY
7:30 AM TO 6:00 PM

CASHIER AND CUSTOMER PICK-UP
7:30 AM TO 7:00 PM
SAT. 8:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF THE PARTS AND LABOR LISTED BELOW

W. Simpson

[REDACTED]

TAG# 0704 C W P NO: 010100
2FALP74W7RX126232 DC 102075A

94 FORD CROWN VIC LX 4DR SDN

EDGEWATER
ANNE ARUNDEL

MD [REDACTED]

INVOICED AT: 06/23/95 12:10:00

LIC: MD 1 STK#1006R0350

DATES: BEGIN: 062195 DONE: 062395 INSVC: 022895 SOLD: 022895 PROB: 11300

ADV: 648 DC: 17A

HOMG:

ODOMETER IN: 5073

WORK:

LN 74 SK SVC : TECH 791 20.00
31 COMPLETED SERVICE SANFORD, 1988

VEN PART NUMBER	DESCRIPTION	NOTE	QTY	PRICE	EXTENDED
FMC FL 820	FILTER		1	8.63	8.63
FMC SW30	OIL		5	1.75	8.75
PARTS AMOUNT					17.38
LAB AMOUNT					20.20
SERVICE SPECIAL ADJUST					4.00
LINE TOTAL - DEPT D					36.58

PARTS	17.38
SUPPLIES	4.64
LAB-MECHANICAL	20.20
SERVICE SPECIAL ADJUSTMENT	4.00
SUB-TOTAL	46.19
TAX	.20
TOTAL-CHARGES	42.07
CASH DUE	42.07

LAB RATE: 64.00

PREFERRED TREATMENT

ATTENTION:

WARRANTY MUST BE PRINTED ALSO

MG

PAGE 1 OF 3

EP82-025 44784



2545 RIVA ROAD ANNAPOLIS, MARYLAND 21401
 ANNAPOLIS 224-2100, BALTIMORE 941-8580, WASHINGTON 281-8220
 DIRECT LINE 288-3087

P & A CODE 00089

PERSON'S NAME			
ADDRESS			
CITY			
STATE			
DATE AND MILEAGE AT TIME OF SERVICE RECEIPT			
DATE		MILEAGE (PER TIER)	
DATE AND MILEAGE AT TIME OF SERVICE RECEIPT			
DATE		MILEAGE (PER TIER)	

PLEASE RETAIN THIS COPY AS
 YOUR SERVICE RECORD. ANY
 CLAIMS OR ADJUSTMENTS
 MUST BE ACCOMPANIED BY
 THIS INVOICE AND MUST
 BE MADE WITHIN 12,000 MILES
 OR ONE YEAR FROM DATE
 WORK WAS PERFORMED.

SERVICE HOURS:
 MONDAY THRU FRIDAY
 7:30 AM TO 8:00 PM

CASHIER AND CUSTOMER PICKUP
 7:30 AM TO 7:00 PM
 SAT. 9:00 AM TO 1:00 PM

I ACKNOWLEDGE RECEIPT OF
 THE PARTS AND LABOR
 LISTED BELOW



TAG# 0704 C W P ROR 01/11/00
 2FALP74W7RX126232 DK 11/11/00
 94 FORD CROWN VIC LX 4DR GDN
 INVOICED AT: 06/23/95 14x16x5

EDGEWATER

MD

IF YOU HAVE ANY QUESTIONS -- PLEASE SEE KARL R. PENNELL



4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

EP02-825 21526

Service
COPY

DOCKET NO. 92-941 DIVISION D

19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

FORD MOTOR COMPANY

STATE OF LOUISIANA

PETITION

NOW INTO COURT, through undersigned counsel, come plaintiffs, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY and STATE FARM FIRE & CASUALTY COMPANY, foreign insurers, authorized to do and doing business in the State of Louisiana, and [REDACTED], persons of the full age of majority, domiciled in the Parish of East Baton Rouge, State of Louisiana, who, with respect, represent the following:

1.

Named defendant herein is Ford Motor Company, a foreign company, authorized to do and doing business in the State of Louisiana, who is indebted unto plaintiffs, for the following, to wit:

2.

At all times pertinent hereto, [REDACTED] were the owners of a certain residence located at [REDACTED], Baton Rouge, Louisiana (hereinafter referred to as the [REDACTED] residence") and a 1993 Lincoln Town Car, identified by Vehicle Identification Number (VIN) 1LNLM81W7PY777849, (hereinafter referred to as the "Sims vehicle").

3.

On or about March 5, 2001, while the [REDACTED] vehicle was parked in the carport at the [REDACTED] residence, a fire occurred in the Sims vehicle causing substantial damage to both the vehicle and the [REDACTED] residence.

4.

The fire originated in the engine compartment of a 1993 Lincoln Town Car owned by the [REDACTED] and was caused by a defect in the speed control deactivation switch, the electrical system, and/or other defects within the 1993 Lincoln Town Car.

5.

The 1993 Lincoln Town Car was designed, manufactured, assembled and sold by defendant, Ford Motor Company.

6.

In May 1999, defendant, Ford Motor Company issued a recall on the 1993 Lincoln Town Car for replacement of the speed control deactivation switch at all times pertinent hereto. Ford Motor Company was aware that the speed control deactivation switch could develop a resistive short in the electrical circuit that could potentially result in an underhood fire.

7.

Defendant, Ford Motor Company, is liable unto plaintiffs for the following acts of negligence and/or fault:

- A. Manufacturing, assembling, marketing and/or selling a product which was unreasonably dangerous in construction or composition;
- B. Manufacturing, assembling, marketing and/or selling a product which is unreasonably dangerous in design;
- C. Manufacturing, assembling, marketing and/or selling a product which is unreasonably dangerous because an adequate warning about the product was not provided; and
- D. Failure to adequately warn users of the risks/dangers of the product subsequent to acquiring such knowledge.

8.

At all times pertinent hereto, State Farm Mutual Automobile Insurance Company insured the [REDACTED] vehicle, and provided coverage for the damages sustained thereto.

9.

Pursuant to the terms of its insurance policy and as a result of the fire, State Farm Mutual Automobile Insurance Company paid to or on behalf of its insureds, [REDACTED], the sum of TEN THOUSAND EIGHT HUNDRED THIRTY-TWO and 20/100 (\$10,832.20) DOLLARS.

10.

At all times pertinent hereto, State Farm Fire and Casualty Company insured the [REDACTED] residence, and provided coverage for the damages sustained thereto.

11.

Pursuant to the terms of its insurance policy and as a result of the fire, State Farm Fire and Casualty Company paid to or on behalf of its insureds, [REDACTED], the sum of TWO THOUSAND EIGHT HUNDRED EIGHTEEN and 17/100 (\$2,818.17) DOLLARS.

12.

Petitioners, State Farm Mutual Automobile Insurance Company and State Farm Fire & Casualty Company is subrogated, legally, conventionally, and by the terms of the policies, to the

rights of [REDACTED] against defendant, Ford Motor Company, to the extent of payments made herein to, or on behalf of, the Sims.

13.

As a result of the incident described above, [REDACTED] have suffered a loss in the form of a deductible in the amount of FIVE HUNDRED FIFTY (\$550.00) DOLLARS, in addition to other property damage, mental anguish, inconvenience, lost wages, and loss of use of their property.

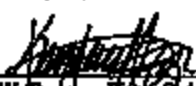
Despite amicable demand, defendant has refused to reimburse plaintiffs for their losses.

WHEREFORE, plaintiffs pray that after due proceedings are had herein, there be judgment in favor of plaintiffs, State Farm Mutual Automobile Insurance Company, State Farm Fire & Casualty Company, and [REDACTED] and against defendant, Ford Motor Company, for the sum of all damages proven at trial, together with legal interest from date of judicial demand until paid, and for all costs of these proceedings. Plaintiffs further pray for all general and equitable relief to which they may be entitled.

By Attorneys:

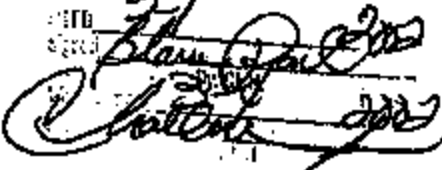
HANNAH, COLVIN & PIPPS
2051 Silverado Drive, Suite 260
Baton Rouge, LA 70808
Telephone: (225) 766-8140

By:


W. Randolph Papp (LA Bar #17748)
Krystina L. Harper (LA Bar #27494)

PLEASE SERVE:

FORD MOTOR COMPANY
through its agent for service of process:
CT Corporation Systems
8550 United Plaza Blvd.
Baton Rouge, LA 70809

3/1
Served

3/1/09
Served


ESP / Recall Information

VIN: 1LNLM81W7PY777849

Contract: 1 Of

Status: Expire

ESP Purchase Details

Purchaser:

Expiration Date: 1997-04-18

Expiration Miles: 65,000

Plan Type: USA 1994 USED 3545,000 LEASEGUARD LIMITED WARRANTY Plan Year: 1994 Selling Dealer: ROBINSON BROS INC

Rental:

Deductible: 100

Towing Allowance:

Purchase Type: N

Options:

ESP Cancellation Details

Cancel Date:

Process Date:

Refund Percent:

Dealer Received Date:

Dealer Credited:

Recall Information

Number	Type	Description	Status	Status Date	Dealer Code
96L12	L	PASS AIR BAG	FORCED COMPLETION	1998-01-22	AUTOC

ESP-025 21636

Vehicle Information Report

GENERAL VEHICLE INFORMATION: (Related Claims)

VIN:	1LNLM61WTFY777849	Vehicle Line:	CAB - TOWN CAR (F336/FN116) (91-97)	Eng Serial No:	W
Model Year:	1993	Market Derived:	CM - MERCURY DIVISION DERIVATIVE	Body Style:	*
Veh Type:	C	Drive Code:	CS - 2 WHL L/H REAR DRIVE	Engine:	CVN - E-M 4.6L 50HC EFI NA CTVS G-JP
Inv Dealer:	11618	Body Cab Style:	CFC - 4 DOOR SEDAN-6 LITE	Transmission:	CDK - 4 SPD AUTO TRANS NAAG AODH
		Version/Serial:	CAB - BASE VERSION - CAB		

BUILD INFORMATION:

Region: NA-#00000000 Plant: BA - WILKOM PLANT BUILD
Country: USA-#00000000 Prod Date: 29-JUL-1993

SALE INFORMATION:

Region: NA-#00000000 Selling Dealer: 325707 - *
Country: USA-#00000000 Selling Dir: SE/Prov FL
Buyer SE/Prov FL
Arrival Date: 09-AUG-1993 Real Carpet Lamin: *
Sale Date: 13-AUG-1993 Fleet/Install/Cn. Lamin F
Warranty Start Date: 13-AUG-1993 Modified Vehicle: *
Orig Warranty Date: 13-AUG-1993 Reacquired Vehicle: * Vehicle Export Flag: N

VOC/EOC:

1 2 3 4 5 6 7 8 9
0017777849 4L 560003703 1V D 10Y 3P 4 0000 P 00000000 2 000 00 0 0
11617 4 2 2 A061A 00 00007 1

EPC-025 21631

INSTALLED OPTION INFORMATION:

Air Conditioning:	CYC - A/C AIR CONDITIONER	GVW Code:	
Alternator Amp Rating:	*	GVW Class Code:	L
Audio Deck:	* - [N/A]	Instrumentation:	AC - ELECTRONIC INSTRUMENTATION
Axle Ratio:	EGACC - 3.08 FINAL DRIVE RATIO	Mirror(Interior Side):	* - [N/A]
Axle Type:	EGJAC - LIMITED SLIP REAR AXLE	Mirror(Exterior Side):	* - [N/A]
Battery Amp Rating:	72	Paint:	PNDAC - MED MOCHA C/C
Brake Code:	FEAAB - 4 WHEEL ANTI-LOCK BRAKES	Power Antenna:	* - [N/A]
Brake Code(Servicio):	* - [N/A]	Radio:	AQ - ELETR PREMIUM AM/FM STEREO/CAS
Calibration Code:	31EDM1A	Sound System:	* - [N/A]
Color(Accent):	* - [N/A]	Super Tandem Axle:	
Color(Trim):	00054 -	Tire Brand:	AJ - MICHELIN
Delivery Type:	M	Tire Size:	235/55R15 WSW
Driveshaft Code:	*	Traction Control:	* - [N/A]
Front Seat:	C/K - SEAT-SPLIT BENCH	Wheel Size:	
Fuel Type:	* - [N/A]		

TIRE DOT INFORMATION:

LF:	*	RF:	*
LR:	*	RR:	*
LL:	*	RL:	*
SPARE:	*		

ESP INFORMATION: EMISSIONS INFORMATION:

ESP Code:	J	Emission Code:	CB - CB
ESP Coverage(Miles):	055	Emission Cert Type:	F
ESP Coverage(Time):	036	Emission Based Suffix:	IV
ESP Plan Year:	1994	Engine Family:	PFM46V3ED2
ESP Signature Date:	18-APR-1994		

ESP2-029 21032

Standard Claims List For Model Year 1993

VIN	VEH LINE	MKT DEPT	BODY CAB	VER SERIES	DRIVE TYPE	PLT CD	TR3 CD	ENG CD	PROD DATE	WARE DATE	SELLING DEALER	SELL CNT	TIS	WCC	CPNC_4	PREF	BASE	SLIP	CCC	CD	DIST (Miles)
1LNLM81W7PY777849	CVB	CM	CFC	CAB	CB	BA	CDK	CVN	28-JUL-1993	13-AUG-1993	325707	USA	2	7H11	120903	F3VY	19972	A	C03	D1	7399
AWS Claim Key: E357346 Trx Code: 2 Labor Hrs: 1.1																					
Dir Ctl-Sub Ctl:		46055-*	Name: BUDGET RAC - ORLANDO			Ph:	4-*	St FL	Ctry Ctl:		USA Reg Ctl:		NA	Repr Date: 25-SEP-1993		Doc # 4070381					
1LNLM81W7PY777849	CVB	CM	CFC	CAB	CB	BA	CDK	CVN	28-JUL-1993	13-AUG-1993	325707	USA	5	5V01	060501	F3VY	1125	A	N27	13	18783
AWS Claim Key: E357348 Trx Code: B64 Labor Hrs: 1.3																					
Dir Ctl-Sub Ctl:		46055-*	Name: BUDGET RAC - ORLANDO			Ph:	4-*	St FL	Ctry Ctl:		USA Reg Ctl:		NA	Repr Date: 09-JAN-1994		Doc # 282942					
1LNLM81W7PY777849	CVB	CM	CFC	CAB	CB	BA	CDK	CVN	28-JUL-1993	13-AUG-1993	325707	USA	5	7003	120102	*	ODOR	*	C06	08	18783
AWS Claim Key: E357349 Trx Code: 6 Labor Hrs: .6																					
Dir Ctl-Sub Ctl:		46055-*	Name: BUDGET RAC - ORLANDO			Ph:	4-*	St FL	Ctry Ctl:		USA Reg Ctl:		NA	Repr Date: 09-JAN-1994		Doc # 282942					
1LNLM81W7PY777849	CVB	CM	CFC	CAB	CB	BA	CDK	CVN	28-JUL-1993	13-AUG-1993	325707	USA	6	6R31	011404	F1VY	5421819	A	B03	42	18783
AWS Claim Key: E357347 Trx Code: B64 Labor Hrs: .6																					
Dir Ctl-Sub Ctl:		46055-*	Name: BUDGET RAC - ORLANDO			Ph:	4-*	St FL	Ctry Ctl:		USA Reg Ctl:		NA	Repr Date: 10-JAN-1994		Doc # 282400					
1LNLM81W7PY777849	CVB	CM	CFC	CAB	CB	BA	CDK	CVN	28-JUL-1993	13-AUG-1993	325707	USA	9	6F48	NANANA	*	40110	*	R06	08	20561
AWS Claim Key: E357350 Trx Code: B64 Labor Hrs: 0																					
Dir Ctl-Sub Ctl:		12294-*	Name: ROBINSON BROTHERS, INC.			Ph:	225-9247068	St LA	Ctry Ctl:		USA Reg Ctl:		NA	Repr Date: 05-MAY-1994		Doc # 4005399					
Tech Comments: SUBLET TO WATER DOCTORS TO REPAIR WATER LEAK AT TRUNK SEALS.																					
1LNLM81W7PY777849	CVB	CM	CFC	CAB	CB	BA	CDK	CVN	28-JUL-1993	13-AUG-1993	325707	USA	9	6R01	010505	F3VY	5403998	A	T53	D4	20561
AWS Claim Key: E357351 Trx Code: B64 Labor Hrs: .2																					
Dir Ctl-Sub Ctl:		12294-*	Name: ROBINSON BROTHERS, INC.			Ph:	225-9247068	St LA	Ctry Ctl:		USA Reg Ctl:		NA	Repr Date: 05-MAY-1994		Doc # 4005399					

1LNLM81W7PY777849 C/VB	CM	CFC	CAB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA	9	6801 0105XX	*	5403398	*	A99	PP	20561
AWS Claim Key:	1147352	Trx Code:	ES4	Labor Hrs:	0														
Dir Ctl-Sub Ctl:	12294-A	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St:	LA	City Ctl:			USA Reg Ctl:	NA	Repr Dates:	06-MAY-1994	Doc #:	005449			
1LNLM81W7PY777849 C/VB	CM	CFC	CAB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA	13	2B03 0300XX	*	9F715	*	A99	PP	26134
AWS Claim Key:	1114892	Trx Code:	S07	Labor Hrs:	0														
Dir Ctl-Sub Ctl:	12294-A	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St:	LA	City Ctl:			USA Reg Ctl:	NA	Repr Dates:	31-AUG-1994	Doc #:	010749			
1LNLM81W7PY777849 C/VB	CM	CFC	CAB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA	13	2B03 030001	F2AZ	9F715	A	D41	42	26134
AWS Claim Key:	1114891	Trx Code:	S07	Labor Hrs:	1.3														
Dir Ctl-Sub Ctl:	12294-A	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St:	LA	City Ctl:			USA Reg Ctl:	NA	Repr Dates:	01-AUG-1994	Doc #:	010749			
1LNLM81W7PY777849 C/VB	CM	CFC	CAB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA	24	7B01 000000	F4LY	19753	A	C05	08	36817
AWS Claim Key:	1637873	Trx Code:	ES3	Labor Hrs:	5.2														
Dir Ctl-Sub Ctl:	12294-A	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St:	LA	City Ctl:			USA Reg Ctl:	NA	Repr Dates:	02-AUG-1995	Doc #:	02408701			
Cost Comments:	NOT GETTING COLD-JUST COOL-USUALLY KLIN ON AUTO AND ABOUT 67 DEG.																		
Tech Comments:	REPLACED AC COMPRESSOR, ACCUMULATOR, ORIFICE TUBE AND ALL ORINGS. INSTALLED FILTER KIT																		
1LNLM81W7PY777849 C/VB	CM	CFC	CAB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA	24	2B03 030001	F2AZ	9F715	A	N11	08	36817
AWS Claim Key:	1637872	Trx Code:	S07	Labor Hrs:	1.2														
Dir Ctl-Sub Ctl:	12294-A	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St:	LA	City Ctl:			USA Reg Ctl:	NA	Repr Dates:	02-AUG-1995	Doc #:	02408702			
Cost Comments:	FOG HORN TYPE NOISE AT TIMES-CAN WORK ACCEL PEDAL AND STOP NOISE																		
Tech Comments:	RSC TEST, REPLACED AIR INTAKE TUBE AS PER TSB, REPLACED RSC MOTOR.																		
1LNLM81W7PY777849 C/VB	CM	CFC	CAB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA	30	7L01 130681	F2VY	13832	A	A85	42	43002
AWS Claim Key:	1676158	Trx Code:	ES3	Labor Hrs:	.1														
Dir Ctl-Sub Ctl:	12294-A	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St:	LA	City Ctl:			USA Reg Ctl:	NA	Repr Dates:	12-JAN-1996	Doc #:	03066001			
Cost Comments:	HORN BUZZ-																		
Tech Comments:	REPLACED HORNS AND RELAY																		
1LNLM81W7PY777849 C/VB	CM	CFC	CAB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA	36	7N03 011109	F3AZ	148118	A	Q07	42	49217
AWS Claim Key:	2897241	Trx Code:	ES3	Labor Hrs:	.7														

Dir Cl-Sub Cb	12294*	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St LA	City Cb	USA Reg Cb	NA	Repr Dates 10-JUN-1996	Doc #03646301
Cost Comments:	L FRONT WINDOW WON'T GO DOWN ALL THE WAY WHEN FIRST HITTING SWITCH AND THEN STILL HAVE TO WORK SWIT										
Tech Comments:	REPLACED WINDOW SWITCH AND RELAY										
LNLM81W7FY7778/B C/VB	C/M	C/C	C/AB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA 35 7N01 000000 PCVY 1820 C A06 08 49217
AWS Chasr Keys	2032942	Trx Code:	B83	Labr Hrs	L9						
Dir Cl-Sub Cb	12294*	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St LA	City Cb	USA Reg Cb	NA	Repr Dates 10-JUN-1996	Doc #03646302
Cost Comments:	BOP IN--ONE OF SPEAKERS--BOP										
Tech Comments:	RML RADIO AND AMPLIFIER TO TEST SYSTEM, REPLACED RIGHT FRONT SPEAKER										
LNLM81W7FY7778/B C/VB	C/M	C/C	C/AB	CB	BA	C/DK	C/VN	29-JUL-1993	13-AUG-1993	325707	USA 35 1A08 070100 FS22 7902 ARM P59 08 49217
AWS Chasr Keys	20413182	Trx Code:	B84	Labr Hrs	49						
Dir Cl-Sub Cb	12294*	Name:	ROBINSON BROTHERS, INC.	Ph:	225-9247068	St LA	City Cb	USA Reg Cb	NA	Repr Dates 10-JUN-1996	Doc #03646304
Cost Comments:	SHUDDER WHEN SHIFTING INTO OVERDRIVE										
Tech Comments:	EBC TEST, REPLACED CONVERTER, FILTER AND FLUID AS PER TSB										

EPR2-029 21635

Claim Detail Report

Model Year = 1993; Claim Key = 8357346

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name BUDGET RAC - ORLANDO

Dealer Code: 46055 - *

Address: 8855 RENT-A-CAR ROAD

City: ORLANDO

State: FL Zip Code: 32812

Country: USA Region Code: NA

Phone: (*)-*

Claim Information

Document Number: 070381

Repair Date: 25-SEP-1993

Distance: 7599

TIS: 2

Cust. Concern Code: C05 - A/C DOES NOT WORK

Condition Code: D1 - POROSITY

Technician Comment:

Customer Comment:

Labor Op CodeLabor Op Description

19700A PRESSURIZE, LEAK TEST, DISCHARGE, EVACUATE AND CH DIAGNOSIS
19700A10 DISCHARGE LINE - COMPRESSOR TO CONDENSER REPLACE
19700B R-12 REFRIGERANT RECOVERY

Causal	Full Part Number	Part	Part			
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity
Y	F3VY	19972	A	LINE COMP TO COND	120305	1
N	*	OSP	*	OUTSIDE PART	120305	1

DMS-020 21037

Claim Detail Report

Model Year = 1993; Claim Key = 8357348

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Serial: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name BUDGET RAC - ORLANDO

Dealer Code: 46055 - *

Address: 8855 RENT-A-CAR ROAD

City: ORLANDO

State: FL Zip Code: 32812

Country: USA Region Code: NA

Phone: (*)-*

Claim Information

Document Number: 282942

Repair Date: 09-JAN-1994

Distance: 18783

TIS: 5

Cust. Concern Code: N27 - VIBRATION OR SHUDDER WHILE BRAKING

Condition Code: I3 - OUT OF ROUND

Technician Comment:

Customer Comment:

Labor Op Code

Labor Op Description

2001AF BRAKE SHOES / PAD ASSEMBLIES - HYDRAULIC REMOVE AND INSTALL OR REPLACE

2001A5T DISC BRAKE ROTOR REPLACE

Causal Flag	Full Part Number	Part Description	Part CPSC	Quantity
Y	F3VY 1125 A	DISC - FRONT WHEEL BRAKE	060301	2
N	F3AZ 2001 C	KIT-BRAKE SHOE LININ	060302	1

E002-073 21030

Claim Detail Report

Model Year - 1993; Claim Key - 8357349

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name: BUDGET RAC - ORLANDO

Dealer Code: 46055 - *

Address: 8855 RENT-A-CAR ROAD

City: ORLANDO

State: FL Zip Code: 32812

Country: USA Region Code: NA

Phone: (*)-*

Claim Information

Document Number: 282942

Repair Date: 09-JAN-1994

Distance: 18783

TIS: 5

Cust. Concern Code: C08 - A/C HEATER/DEFROSTER ODOR ONLY AT STARTUP

Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)

Technician Comment:

Customer Comment:

Labor Op Code Labor Op Description

930909A REPLACE

Causal Flag	Full Part Number	Part Description	Part CPSC	Quantity
Y	* ODOR *	MUSTY ODOR PLENUM	120102	0
N	* OSP *	OUTSIDE PART	120102	1

E982-425 21841

Claim Detail Report

Model Year = 1993; Claim Key = 8357347

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: ILNLM81W7PY777849

Dealer Information

Dealer Name BUDGET RAC - ORLANDO

Dealer Code: 46055 - *

Address: 8855 RENT-A-CAR ROAD

City: ORLANDO

State: FL Zip Code: 32812

Country: USA Region Code: NA

Phone: (*)-*

Claim Information

Document Number: 282400

Repair Date: 10-JAN-1994

Distance: 18783

TIS: 6

Cust. Concern Code: B05 - BODY PANELS HARD TO OPEN

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment:

Customer Comment:

Labor Op Code

Labor Op Description

21818A

CONTROL AND LINK ASSEMBLY - FRONT/REAR DOOR LATCH REPLACE

Causal	Full Part Number	Part	Part			
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity
Y	F1VY	5421819	A	REM CNTL ASY L 011404		1

E062-828 21443

Claim Detail Report

Model Year = 1993; Claim Key = 8357350

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 005399

Repair Date: 05-MAY-1994

Distance: 20561

TIS: 9

Cust. Concern Code: R06 - WATER LEAK AROUND TRUNK/HATCHBK/LIFTGT/RR CARGO DR

Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)

Technician Comment: SUBLET TO WATER DOCTORS TO REPAIR WATER LEAK AT TRUNK SEALS.

Customer Comment:

Labor Op Code Labor Op Description

OSL OUTSIDE LABOR

Causal	Full Part Number	Part	Part
Flag	FREE BASE SUKE	Description	CPSC Quantity
Y	* 40110 *	DOOR ASY-LUGGAGE NANANA	0

PRR-025 21845

Claim Detail Report

Model Year = 1993; Claim Key = 8357351

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 005399

Repair Date: 05-MAY-1994

Distance: 20561

TIS: 9

Cust. Concern Code: T53 - INTERIOR MOLDINGS-LOOSE, POOR FIT, WARPED, WRINKLED

Condition Code: D4 - FLAW IN MATERIAL

Technician Comment:

Customer Comment:

Labor Op Code

Labor Op Description

03598A MOULDING - WINDSHIELD GARNISH - SIDE REPLACE -

Causal	Full Part Number	Part	Part			
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity
Y	F3VY	5403598	A	MLDG,W/S GARN R	010505	1

E882-028 21847

Claim Detail Report

Model Year = 1993; Claim Key = 8357352

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 005449

Repair Date: 06-MAY-1994

Distance: 20561

TIS: 9

Cust. Concern Code: A99 - ADMINISTRATIVE (PARTS RETURN/ETC.)

Condition Code: PP - LOANER CAR

Technician Comment:

Customer Comment:

Labor Op Code Labor Op Description

Cancel	Full Part Number	Part	Part			
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity
Y	*	5403598	*	MLDG,W/S GARN R 0105XX		1

6902-025 21849

Claim Detail Report

Model Year = 1993; Claim Key = 11146092

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name: ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 010749

Repair Date: 31-AUG-1994

Distance: 26134

TIS: 13

Cust. Concern Code: A99 - ADMINISTRATIVE (PARTS RETURN/ETC.)

Condition Code: PP - LOANER CAR

Technician Comment:

Customer Comment:

Labor Op Code Labor Op Description

Causal Flag	Full Part Number	Part Description	Part CPSC	Quantity
Y	* 9F715 *	VALVE-AIR BYPASS 0300XX		2

E902-025 21651

Claim Detail Report

Model Year = 1993; Claim Key = 11146091

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Claim Information

Document Number: 010749

Repair Date: 31-AUG-1994

Distance: 26134

TIS: 13

Dealer Information

Dealer Name: ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Cust. Concern Code: D41 - ENGINE HESITATES/SURGES AT STEADY SPEED

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment:

Customer Comment:

<u>Labor Op Code</u>	<u>Labor Op Description</u>
12650D	REC - (QUICK TEST) DIAGNOSIS
12650DX1	EXTRA TIME TO REPEAT FINAL QUICK TEST
12650D45	PIN POINT TEST DIAGNOSIS
12650D3	VALVE ASSEMBLY (IDLE AIR CONTROL) - IAC REPLACE

<u>Causal</u>	<u>Full Part Number</u>	<u>Part</u>	<u>Part</u>
<u>Flag</u>	<u>PREF</u>	<u>BASE</u>	<u>CPSC</u>
	<u>SUFF</u>	<u>Description</u>	<u>Quantity</u>
Y	F2AZ 9F715	A VALVE-AIR BYPASS 030001	1

800-828-2103

Claim Detail Report

Model Year = 1993; Claim Key = 16378793

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name: ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 02408701

Repair Date: 02-AUG-1995

Distance: 36817

TIS: 24

Cust. Concern Code: C05 - A/C DOES NOT WORK

Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)

Technician Comment: REPLACED AC COMPRESSOR, ACCUMULATOR, ORIFICE TUBE AND ALL ORINGS. INSTALLED FILTER KIT

Customer Comment: NOT GETTING COLD--JUST COOL--USUALLY RUN ON AUTO AND ABOUT 67 DEG.

Labor Op Code**Labor Op Description**

19700A	PRESSURIZE, LEAK TEST, DISCHARGE, EVACUATE AND CH DIAGNOSIS
19700B	R-12 REFRIGERANT RECOVERY
19700C	EVAPORATOR CORE LEAKAGE TEST DIAGNOSIS
19700A3T	O-RING(S) OR O-RING KIT REPLACE
19700A4	COMPRESSOR ASSEMBLY - AIR CONDITIONER REPLACE
19700A8	LIQUID LINE-CONDENSER TO EVAPORATOR REPLACE
19700A9	SUCTION LINE - EVAPORATOR TO COMPRESSOR REPLACE
19700A10	DISCHARGE LINE - COMPRESSOR TO CONDENSER REPLACE
19700A17	ORIFICE - AIR CONDITIONER EVAPORATOR CORE REPLACE
19700A18	ACCUMULATOR ASSEMBLY-AIR CONDITIONER REPLACE
930908A	REPLACE
930908C	REPLACE

Causal	Full Part Number	Part	Part
Flag	PREF BASE SUFF	Description	CPSC Quantity
Y	F4LY 19703 A	COMPRESSOR-A/C	000000 1
N	F3VY 19C836 A	ACCUMULATOR/HOSE	NANANA 1
N	F3XY 19D990 A	ORIFICE-EXPANSION	NANANA 1
N	F2VY 19E773 C	KIT A/C SYSTEM FILTR	NANANA 1
N	F3AZ 19B519 SA	R-12 FREON	NANANA 38
N	* OSP *	OUTSIDE PART	000000 1

E402-025 21065

Claim Detail Report

Model Year = 1993; Claim Key = 16378792

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 02408702

Repair Date: 02-AUG-1995

Distance: 36817

TIS: 24

Cust. Concern Code: N11 - UNUSUAL ENGINE NOISE AT IDLE

Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)

Technician Comment: EEC TEST, REPLACED AIR INTAKE TUBE AS PER TSB, REPLACED ISC MOTOR

Customer Comment: FOG HORN TYPE NOISE AT TIMES-CAN WORK ACCEL PEDAL AND STOP NOISE

<u>Labor Op Code</u>	<u>Labor Op Description</u>
12650D	EEC - (QUICK TEST) DIAGNOSIS
12650DX1	EXTRA TIME TO REPEAT FINAL QUICK TEST
12650D3	VALVE ASSEMBLY (IDLE AIR CONTROL) - IAC REPLACE
942204B	REPLACE

<u>Causal</u>	<u>Full Part Number</u>	<u>Part</u>	<u>Part</u>			
<u>Flag</u>	<u>PREF</u>	<u>BASE</u>	<u>SUFF</u>	<u>Description</u>	<u>CPSC</u>	<u>Quantity</u>
Y	F2AZ	9F715	A	VALVE-AIR BYPASS	030001	1
N	E7SZ	9F670	A	GSKT AIR B/PASS VLVE	03XXXX	1
N	F5AZ	9H308	A	TUBE ASSY AIR VALVE	030001	1

E002-020 21057

Claim Detail Report

Model Year = 1993; Claim Key = 18781889

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name: ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 03066001

Repair Date: 12-JAN-1996

Distance: 43002

TIS: 30

Cust. Concern Code: A85 - OTHER ELECTRICAL ACCESSORY TROUBLES

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: REPLACED HORNS AND RELAY

Customer Comment: HORN INOP-

Labor Op Code

Labor Op Description

13832A HORN ASSEMBLY - ELECTRIC REPLACE

13025B HORN RELAY REPLACE

Causal	Full Part Number	Part	Part			
Flag	PREF	BASE	SUFF	Description	CPSC	Quantity
Y	F2VY	13832	A	HORN ASY-HIGH PITCH	130601	1
N	FOAZ	14N089	A	RELAY ASSY	1801XX	1

EM2-025 21609

Claim Detail Report

Model Year = 1993; Claim Key = 20399943

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name: ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 03646301

Repair Date: 10-JUN-1996

Distance: 49217

TIS: 35

Cust. Concern Code: G07 - WINDOW OPENING, CLOSING TROUBLES-POWER

Condition Code: 42 - DOES NOT OPERATE PROPERLY

Technician Comment: REPLACED WINDOW SWITCH AND RELAY

Customer Comment: L. FRONT WINDOW WON T GO DOWN ALL THE WAY WHEN FIRST HITTING SWITCH AND THEN STILL HAVE TO WORK SWIT

<u>Labor Op Code</u>	<u>Labor Op Description</u>
14529A	SWITCH - POWER WINDOW REPLACE
14677A	RELAY-POWER WINDOW REPLACE

<u>Causal</u>	<u>Full Part Number</u>	<u>Part</u>	<u>Part</u>			
<u>Flag</u>	<u>PRRF</u>	<u>BASE</u>	<u>SUFF</u>	<u>Description</u>	<u>CPSC</u>	<u>Quantity</u>
Y	F3AZ	14B118	A	CNIRL WDO REGULATOR	011109	1
N	FOVY	14529	A	SWITCH ASY-WINDOW RE	011109	1

EPR-025 21001

Claim Detail Report

Model Year = 1993; Claim Key = 20399942

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name: ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 03646302

Repair Date: 10-JUN-1996

Distance: 49217

TIS: 35

Cust. Concern Code: A06 - SPEAKER TROUBLES

Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)

Technician Comment: RNR RADIO AND AMOPLIFIER TO TEST SYSTEM, REPLACED RIGHT FRONT SPEAKER

Customer Comment: SOP IN—ONE OF SPEAKERS—INOP

<u>Labor Op Code</u>	<u>Labor Op Description</u>
18808AF	SPEAKER(S) - RADIO REPLACE
18805B	RADIO REMOVE
18805C	RADIO - AFTER REPAIR INSTALL
18849A	AMPLIFIER - PREMIUM SOUND REMOVE
18849B	AMPLIFIER ASSEMBLY - PREMIUM SOUND INSTALL

<u>Causal</u>	<u>Full Part Number</u>	<u>Part</u>	<u>Part</u>
<u>Flag</u>	<u>PREF</u>	<u>BASE</u>	<u>SUFF</u>
	<u>Description</u>	<u>CPSC</u>	<u>Quantity</u>
Y	POVY 18808	C	SPEAKER ASY 000000 1

ENG-025 21663

Claim Detail Report

Model Year = 1993; Claim Key = 20413189

Vehicle Information

Model Year: 1993

Market Derived: C/M - MERCURY DIVISION DERIVATIVE

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

Version/Series: C/AB-BASE VERSION - CAR

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

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

Warranty Start Date: 13-AUG-1993

Production Date: 29-JUL-1993

VIN: 1LNLM81W7PY777849

Dealer Information

Dealer Name ROBINSON BROTHERS, INC.

Dealer Code: 12294 - *

Address: 9550 INTERLINE DR

City: BATON ROUGE

State: LA Zip Code: 70809

Country: USA Region Code: NA

Phone: (225)706-7068

Claim Information

Document Number: 03646304

Repair Date: 10-JUN-1996

Distance: 49217

TIS: 35

Cust. Concern Code: P59 - OTHER AUTOMATIC TRANSMISSION TROUBLES

Condition Code: 08 - OTHER/UNKNOWN(NO APPROPRIATE COND. CODE)

Technician Comment: BEC TEST, REPLACED CONVERTER, FILTER AND FLUID AS PER TSB

Customer Comment: SHUDDER WHEN SHIFTING INTO OVERDRIVE

Labor Op Code Labor Op Description

952304I REPLACE

Causal	Full Part Number	Part	Part
Flag	PREF BASE SUFF	Description	CPSC Quantity
Y	F5ZZ 7902 ARM	CONVERTER ASY	070100 1
N	XT 2 QDX	MOTORCRAFT BATTERY	190101 10
N	FZVY 7A098 A	SCREEN ASY - OIL PAN	070100 1

E902-020 21000

CSCN140

VEHICLE DATA

07/25/03 14:54:24

==>

ENTER VIN ==> 1LNLM81W7PY777849

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

OWNER NAME :

FREET ADDR :

CITY : BATON ROUGE

ST/PRV: LA CTRY:

ZIP/POSTAL CODE: [REDACTED] N/A YY-MM-DD 95-02-06

MODEL YEAR : 93 PLANT: Y

N/A SOURCE: P

BODY STYLE DESC: 4 DR SEDAN

SALE YY-MM-DD 93-08-13

VEHICLE DESC : 1993 TOWN CAR

PRODUCTION YY-MM-DD 93-07-29

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	88	E	214	45	CC
FACING	3	25	D	707		
RESPONSIBLE	3	22	D	408		

CA EMISSION : ENGINE TAG CODE : 3G812BA

CAMPAIGN COUNTS

NAVIS STATUS : 800

COMPANY CAR IND :

TOTAL CAMPAIGNS : 01

DSO DISTRICT :

FLEET CODE :

OPEN : 00 CLOSED : 01

DSO NUMBER :

FLEET STATUS :

ACTIVE: 01 HISTORY: 00

F1-INQUIRY F3=EXIT F4=G160 F5=G150 F6=CONTINUE SEARCH F9=G130

OGDB432

CSCN150

CAMPAIGN VEHICLE INFORMATION

07/25/03 14:54:30

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 1LNLM81W7PY777849 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 22 408 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-MO MORE DATA TO DISPLAY

OGDB432

CSCN130

NOTIFICATION RECIPIENT HISTORY

07/25/03 14:54:32

==>

ENTER CAMPAIGN NBR ==> 96112 VIN ==> 1LNLM81W7PY777849
DEFECT : PASS AIR BAG BODY STYLE DESC: 4 DR SEDAN
ESP DEALER : 322408 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: CM
STREET ADDR1 :
ADDR2 :
CITY : BATON ROUGE CTRY:
ZIP/POSTAL CODE: N-A SOURCE: P N-A EFF DATE: 95-02-06 YY-MM-DD

RESP DEALER : BEGINNING MAILED DATE: YY-MM-DD
RELEASE DESC : ENDING MAILED DATE : YY-MM-DD
CAMPAIGN DIV : FLEET CODE: FLEET MGMT LOC CODE:
LAST NAME : INITIALS:
STREET ADDR1 :
ADDR2 :
CITY : CTRY:
ZIP/POSTAL CODE: N-A SOURCE: N-A EFF DATE: YY-MM-DD
F1=INQUIRY F3=EXIT F4=QUIT F5=G150 F7-FIRST PAGE F8=NEXT PAGE F9=G140
1048-LAST PAGE OGD8432

CSCN150

CAMPAIGN VEHICLE INFORMATION

07/25/03 14:54:34

==>

ENTER CAMPAIGN NUMBER==> 96L12 VIN==> 1LNLM81W7PY777849 TYPE OF SEARCH: A
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

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

OGDB432

E802-025 21000

4

5

6

7

8

9

ER02-025 21078

MASTER FILE REPORT VIN: 1LNLM81W7PY777849

REQUEST DATE: 03/29/02 PAGE 1

REQ: 1LNLM81W7PY777849 KEY: 95Y777849 REQUESTED BY: SHDC001 REQUEST ID:

LAST ACTIVE: 04/18/96

PAGE 05

LINE 01 VIN: 1LNLM81W7PY777849 KEY: 95Y777849 REQUESTED BY: SHDC001 REQUEST ID: LAST ACTIVE: 04/18/96

VEHICLE ORDER IMAGE

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

VEHICLE ORDER IMAGE

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STOCKING DATES

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STOCKING DATES

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STOCKING DATES

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STOCKING DATES

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STOCKING DATES

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STOCKING DATES

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

STOCKING DATES

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 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

MAR 27 2002 12:14

ER02-025 21671

MASTER FILE REPORT VIN: 1LNLMB1M7PY77849

REQUEST DATE: 03/25/02 PAGE 2

PRICE: 05

LINE # 10 N/A RECEIPT DATE 930813 CURR OMN EFF DATE 930813 VEN MOD CODE F POST SALE DATE POST RLSE DATE

LINE # 11 ORDERING NAME BUDGET ORL P&C CHARGE 92.50 FL PLN ALLOW 84.87 P&C EXTRACT DATE 930825 DEALER FIN EXT DATE PD SC ADV CMT CODE ADV EXTRACT DATE PRE-DELVRY AMT 0.00 PRE-DELIVERY CENTER 0.00 FLOOR PLAN DATE 930825 PRE-DELIVERY DATE

LINE # 12 ENGINE CALIBRAT 318D11A SOLD-TO FIN CODE Y KTP PPA MYV TRK LN SET DATE NT SR CENTRAL IN PROC DATE 940214 CEN PRC CODE MKT SD CTR 0 OPT IND Y SPC REQ 1 SPC REQ 2 VIN 1LNLMB1M7PY77849 WARR STAT CODE H D S U ENI COM IND FIN-CODE ORDER 4TH PRIOR JYJ BU087

LINE # 13 STK DEALERS & DATES ----- STN 4TH STN FDC TAX 00000.00 ADV 1PC 00000 TRANSMISSION SERIAL NBR FT PR CO DRIVER-AIR-BAG SERIAL NBR 04 FTQ12400320 PASSENGER-AIR-BAG SERIAL NBR 16173A139 PROD HOUR CUSTOMER PHONE NOT-AVAILABLE

LINE # 14 BUSINESS PHONE NOT-AVAILABLE DRIVER SIDE CODE PASSENGER SIDE CODE ENGINE FAMILY PER4.6V5FHF2 SALES PRSM CTY L T CO CAR LESSEE SS 0 CDE I L FIRST NAME 1111 9 HI TAG NUMB REP BUDGET REN

LINE # 15 DEPT GARAGE SOC COUNTRY P.O. BOX /APPT # ADDRESS 225 E ROBINSON ST CITY ORLANDO ST ZIP FL 32801 37509-A

LINE # 16 SELLING L T FIN CDE T FIRST NAME BU087 SECONDARY NAME MI LAST NAME

3-27-02: 1:05PM

MR 27 2000 12:14

EA02-025 21072

MASTER FILE REPORT VIN: 1LMNL61W7PY777849

REQUEST DATE: 03/23/02 PAGE 3

LINE	IMPORT ACTIVE DATE	INV BASE COST	SHIP REF	DMG CDE	IVS INV LVL	IVS INVOICE OPTIONS	PLANT RELEASE	PORT ARRIVAL	SHIP TO US	EST US ARRIVAL	DATES US PORT ARRIVAL	DAMAGE REPORT	DAMAGE REPAIR	AVAIL ASSIGN	ASSIGN DEALER
------	--------------------------	------------------	-------------	------------	-------------------	---------------------------	------------------	-----------------	---------------	-------------------	-----------------------------	------------------	------------------	-----------------	------------------

777
1313

LINE	IVS INV RECEIPT DATE	INV LND PROCESS DATE	EXP VEN ACTIVITY DATE	EXPORT STEAMER NAME	EXPORT BOOKED DATE	STEAMER SAIL DATE	STEAMER ETA DATE
------	----------------------------	----------------------------	-----------------------------	---------------------------	--------------------------	-------------------------	------------------------

LINE	ACTIVITY DATE	DVK	VEN LN	LBL IND	BODY SER	ENGINE TAG NUM	EPA ENG CODE	TEAM CODE	AXLE CODE	CALF ENIS	HIGH ALT	CAT CODE	MHL BASE	RSVD FLD
------	------------------	-----	-----------	------------	-------------	-------------------	--------------------	--------------	--------------	--------------	-------------	-------------	-------------	-------------

LINE	(1756)---EPA MILEAGE DATA---(1788)	EPA ENTRY CODE	CAN LAB DATA	CAN LAB TYPE	CAN UNB	CAN HOY	CAN RATE	BASE FHV AMOUNT	OPTION FHV AMOUNT	GAS FHV AMOUNT	MISC FHV AMOUNT
------	------------------------------------	----------------------	--------------------	--------------------	------------	------------	-------------	-----------------------	-------------------------	----------------------	-----------------------

PRE-07

3-27-02 1:08PM

MAR 27 2002 12:14

0002-025 21873

REQ: 1LNLPM1N7PY777849 KEY: 95Y777849 REQUESTED BY: 5HDC001 REQUEST ID:

REQUEST DATE: 13/25/02 PAGE 1

LAST ACTIVE: 06/18/96

[illegible]

VEHICLE ORDER IMAGE																				
LINE	0	1	2	3	4	5	6	ST	BT	AL	CAR	TR	TR	ENG	ENGINE A	ENG	E	CAL	ENGINE	SERL
02	4	8	2	A751A	MP	BU007		OR	AMP	AXL	SZ	DR	HML	AG	COB	X	BTRO	R	LBL	NUMBER
	567890123456789012345678901234567890							B	72		JY		A	N40	3081234		00473			

LINE	IGNITION	TRUNK	SELLING	FACING	SHIFTD	PRIOR	ORD	OLD	CURR	STOCKLINE	DEALERS	ORIG
1 83	KEY CODE	KEY CODE	DEALER	DEALER	DEALER	DEALER	NET	DLR	STOCK	1ST	2ND	3RD
	CLASSIFIED									PRIOR	PRIOR	PRIOR
			25C787	25C787	88J214	25C787	25	787	25C787			25787

		STOCKING DATES			D A T E S									
LINE	CURR	1ST	2ND	3RD	P&A	ORD	ORDER	SERIAL	ORIG	REV	SUBMIT	BUCKED	PRODUCE	CANCEL
F 04	STOCK	PRIOR	PRIOR	PRIOR	DEALER	TYP	RECP		SCHED	SCHED				FROM
	930729				11658	5	950618	930621	930726	930726	930625	930729	930729	

LINE	MEMO	RAIL	INV	ORIG	CURR	CONVOY	CONVOY	STATUS	LAST	CANCEL	SLS CD
NO	CONSON	RELEASE	PREP	RELEASE	PLTBUS	RPT DV	DELVRY	CHANGE	ACTIVE	SALE	RECEIPT
		930729	930722	930729	930729	930809	930812	930813	960418	930813	930813

[illegible]

LINE	NOG	STATUS	ST	COPAC	RAMP	MT	TRN	HL	RAILCAR	RAIL	TOT CURR	BASE	BASE	OPTION	TOTAL	
# 07	DATE	CD	DATE	CODE	SH	TIME	AL		ID	TIME	INVOICE	VEHICLE	HOLDBACK	HOLDBACK	AMT	
	950809	P	950806	14	7	18	24		ETTX984504	18	29108.15	27984.00	462.00	0.00	0.00	0.00

LINE	BASE VEH	OPTION	BASE	OPTION	ADVER	FINANCE	ORG	ORG	CVR	CVR	RL	SH	PRICE	PRICE	MC	C	CHG
NO	ADJ	ADJ	NO ADJ	NO ADJ	FUND	CHARGE	PFL	SCH B	PFLC	SCH B	ST	ST	DATE	AMOUNT	LC	B	BACK
	0.00	0.00	0.00	0.00	0.00	0.00	548		360		TE						ANT

LINE	ORDER	FOR	30-DAY	RT	M	INT ST	INT ST	TOTAL	ORIG	CURR	ORIGINAL	SCHEDULE	SCHEDULE
09	FIN CD	FP AHT	DR	S	DATE	DATE	INVOICE	CHARGES	CHARGES	CHRG	MISC	GAS/	FINANCE
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MASTER FILE REPORT VIN: 11MLN81M7PY77849

REQUEST DATE: 03/25/02 PAGE 2

PRE-05

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MASTER FILE REPORT VIN: 1LNLM81M7FY777849

REQUEST DATE: 83/23/82 PAGE 3

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PAGE 07

DR:01 CNO: 20 CNO

1993 TOWN CAR

EC82-525-B 15977

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1ST JUDICIAL DISTRICT COURT
PARISH OF EAST BATON LOUÏS
STATE OF LOUISIANA

CASE NO. 492,441
DIVISION "C"

STATE FARM MUTUAL
AUTOMOBILE INSURANCE
COMPANY, BY AL.

VERSUS

YVES MOYER COMPANY

Deposition of MARK E. KOFFMAN,
THREE PARKWAY BOULEVARD, SUITE 100 WEST,
DEARBORN, MICHIGAN 48126, taken in the
actions of MCKINNEY, ALSTADT, ANSELMO,
HARDY, WANNELL & MCCABE, PC, 3443 North
Cassway Boulevard, Suite 100, Metairie,
Louisiana 70001, commencing at 1:00 p.m.
on the 18th day of September, 2001.

APPEARANCES:

HANNAN, CUMVIN & PIPES, L.L.P.
Attorneys at Law
(By: W. Hannan Pipes, Esquire)
2081 Silverdale Drive, Suite 100
Metairie, Louisiana 70001
(Attorneys for the Plaintiffs)

MCKINNEY, ALSTADT, ANSELMO, HARDY,
WANNELL & MCCABE, PC
Attorneys at Law
(By: James C. Rather, III, Esquire)
3443 North Cassway Boulevard,
Suite 100
Metairie, Louisiana 70001
(Attorneys for the Defendant)

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1 REPORTED BY:
2 KELLY M. WALLACE
3 Certified Court Reporter
4 Registered Professional Reporter
5 CURRAN & LANDRIG, INC.
6 749 Aurora Avenue, Suite 4
7 Metairie, Louisiana 70001
8 (504)833-3330 Fax (504)833-3383

I N T E R
R E W
E X A M I N E E

9 EXAMINATION BY MR. PIPES: 4
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12 EXHIBIT M01 21
13 EXHIBIT M02 22
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1 EXHIBIT M01
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It is stipulated and agreed by and
between counsel for the parties hereto that
the deposition of the aforementioned
witness is hereby being taken under the
Louisiana Code of Civil Procedure, Article
1421, et seq., for all purposes, in
accordance with law.

That the formalities of reading and
signing are specifically not waived;
That the formalities of filing,
reading and certification are specifically
waived;

That all objections, save those as
to the form of the question and the
competency of the answer, are hereby
reserved until such time as this
deposition, or any part thereof, may be
used or sought to be used in evidence.

KELLY M. WALLACE, Certified Court
Reporter, Registered Professional Reporter,
in and for the Parish of Orleans, State of
Louisiana, officiated in administering the
oath to the witness.

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1 MARK E. KOFFMAN.
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after having been first duly sworn by the
above-mentioned certified court reporter,
did testify as follows:

EXAMINATION BY MR. PIPES:

Q. Mr. Koffman, as you know, my name
is Randy Pipes. And we're here to take
your deposition on this occasion in the
Sims matter; is that correct?

A. Yes, sir.

Q. Okay. Do you have a current copy
of your CV?

A. No, I do not, not with me.

THE WITNESS:
Do you have a copy?

MR. RATHER:
Not with me.

EXAMINATION BY MR. PIPES:

Q. I believe I have taken your
deposition in the last six months.
Assuming that is true, what updates would
you have as far as seminars, either
attending or lecturing or education, any
changes?

A. Just one, we taught at a seminar

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1 a couple of weeks ago in West Virginia for
2 the West Virginia chapter of International
3 Association Of Arson Investigators. I
4 think otherwise the copy you have should be
5 up to date.

6 Q. That was a vehicle fire seminar?
7 A. Yes.

8 Q. In connection with fire
9 investigation of a vehicle fire?
10 A. Yes.

11 Q. Were you a lecturer or attendee?
12 A. I was a lecturer.

13 Q. Along with who else?
14 A. A group of us from Ford, some of
15 the other design analysis engineers.

16 Q. Who were they specifically?
17 A. Specifically?
18 Q. Yeah.

19 A. Let me think. Chuck Adams was
20 one of them. John Washington was there,
21 Tom Desantis.

22 Q. How do you spell Desantis?
23 A. D-E-S-A-N-T-I-S.

24 Q. Okay.

25 A. I came in late. I'm not really

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1 sure who else was there. Now that I think
2 about it, there were seven of us I think.

3 Q. All lecturers or were you one of
4 the few?
5 A. Yes.

6 Q. Were there materials passed out
7 in connection with the lecture?
8 A. You know, I don't know. I think
9 some of the other guys might have had some
10 handouts. I didn't particularly.

11 Q. An outline perhaps?
12 A. I guess you would call it a table
13 of contents that would be published as part
14 of the seminar.

15 Q. Were Larry Halton and Ralph
16 Newell in attendance?
17 A. They were scheduled to be in
18 attendance, but Ralph had fallen sick
19 that -- the night before. So he was
20 actually in the hospital there in West
21 Virginia that day. So they didn't actually
22 attend the seminar.

23 Q. Is this a seminar similar to ones
24 that y'all have put on in other places?
25 A. Yes.

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1 Q. It's kind of a canned seminar
2 that you have done before?
3 A. I wouldn't exactly call it
4 canned, we freshen it up as experience
5 dictates. But it's very similar in format,
6 yes.

7 Q. Y'all did an actual car burn, a
8 vehicle burn?
9 A. Three of them, yes.

10 Q. What model vehicles were burned?
11 A. I'm not sure of the model year
12 but they were three Aerostar minivans,
13 which having three vehicles of the same
14 model gave us the opportunity to actually
15 start fires in three different locations
16 and be able to compare the burn patterns
17 from one vehicle to the next.

18 Q. Can you recall any lectures or
19 seminars in which you either taught or
20 attended wherein either a Town Car, Grand
21 Marquis or Crown Vic were burned?
22 A. I don't believe I recall ever
23 burning any of those vehicles in a seminar.

24 Q. In connection with these
25 seminars, are records kept for information

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1 purposes as far as to build some type of
2 research data base, for example?
3 A. No, not specifically.

4 Q. Are they videotaped?
5 A. We do videotape most of them now,
6 yes.

7 Q. And the videos and photographs
8 from the seminars are kept?
9 A. I believe so, yeah.

10 Q. Is any particular model selected
11 for a reason or purpose?
12 A. No.

13 Q. Since you have been at Ford have
14 you ever participated in a vehicle burn of
15 a Lincoln Town Car?
16 A. Yes.

17 Q. Where did that take place?
18 A. There was a test burn that we did
19 in Dearborn, Michigan. I don't recall the
20 exact date. It was sometime in 1999.

21 Q. For what purpose?
22 A. I believe it had to do with
23 recall 99B15 on the speed control
24 deactivation switch.

25 Q. Do you recall if the test burn

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1 was performed while the root cause of the
2 fire was being investigated?
3 A. You know, I don't recall the
4 exact date. I don't think so. I think it
5 was after the recall.
6 Q. Have you participated formally or
7 informally in any investigation or research
8 subsequent to the recall other than these
9 particular claims that are assigned to you?
10 A. No other specific scientific
11 research, just lawsuits and insurance
12 claims that I've investigated.
13 Q. Okay. And again, I want to ask
14 some questions that are exclusive of just
15 the claims that are coming in. I want to
16 know if Ford has assembled an individual or
17 group of individuals to investigate whether
18 or not the scope of the initial recall was
19 sufficient or appropriate.
20 MR. RATHER:
21 I'm going to object right
22 there, Randy, for the same reason we
23 objected last time. This is not a
24 1442 deposition. To the extent this
25 answer or any answer requires a

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1 of times since the recall. And our
2 automotive safety office, they are the
3 people who are responsible for interfacing
4 with the National Highway Traffic Safety
5 Administration.
6 Q. What communication if any do you
7 have with the safety office?
8 A. In this particular case, 99815,
9 they will sometimes come over and discuss
10 just general technology about the switch
11 with me because they know I've been working
12 a lot of the investigations.
13 Q. Do you know whether or not NHTSA
14 has an ongoing or pending investigation
15 into the scope of 99815?
16 A. I believe there is still a study
17 pending at the moment.
18 Q. Have you participated in any way
19 in the gathering of information in
20 connection with that subsequent or pending
21 investigation of NHTSA?
22 A. I have turned over my engineering
23 files on cases that were relevant to
24 NHTSA's request for information, so that
25 those files could be copied and sent to

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1 corporate response from Ford, I am
2 going to object and instruct him not
3 to answer.
4 If it's his personal
5 knowledge --
6 MR. PIPES:
7 That's all I'm asking. For
8 the record, I will assume that all of
9 his responses are based on his
10 personal knowledge and not that of
11 Ford.
12 THE WITNESS:
13 Can I have the question
14 again, please?
15 EXAMINATION BY MR. PIPES:
16 Q. Sure. Are you aware of any
17 individual or group of individuals that
18 have been assigned the task or requested to
19 investigate whether or not the scope of the
20 99 recall was sufficient or appropriate
21 regarding the speed control deactivation
22 switch problems?
23 A. I know that the National Highway
24 Traffic Safety Administration has
25 re-investigated the recall 99815 a couple

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1 NHTSA as part of the corporate response.
2 Q. The files that you copied in
3 connection with your testimony, would that
4 have been files wherein you felt that the
5 switch was involved or merely when the
6 switch was allegedly involved in a fire?
7 A. These were all of the files or
8 cases that I have been assigned to.
9 Q. Involving a switch?
10 A. Either involving a switch or an
11 allegation around the switch.
12 Q. And that was my question. You
13 turned the files over whether you agreed or
14 disagreed with the involvement of the
15 switch?
16 A. That's correct.
17 Q. Okay. Do you know how many
18 alleged fires involving the Town Cars,
19 Grand Marquis and Crown Vics are now
20 known by Ford?
21 A. No.
22 Q. Do you have any idea or have you
23 known in the past what the total or
24 approximate total of the alleged fires are?
25 A. Just a rough idea, order of

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1 magnitudes as it was in the hundreds. I
2 would say -- I would say 400 or 500,
3 something in that order. That's a rough
4 guesstimate.

5 Q. When was that known to you? How
6 long ago was it that you thought that 400
7 to 500 was the ballpark?

8 A. I really couldn't say. As I
9 said, it's just kind of a, you know, a
10 guess. So just more of a feeling, I guess,
11 than I would say a guess.

12 Q. What was your involvement if any
13 in the original investigation by NHTSA and
14 the resulting 99S15 recall?

15 A. I was not involved in the
16 original recall work at all.

17 Q. What have you done subsequent to
18 the recall to educate and inform yourself
19 as to the history of this switch from its
20 initial design and manufacture to the
21 recall itself or to the present time even?

22 A. The legal staff -- excuse me --
23 the legal staff and I went around and
24 discussed the recall work that had been
25 done by all of the people who were

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1 involved. And subsequent to that, there's
2 been an awful lot of information back and
3 forth because of lawsuits and whatnot. So
4 there's been information available from not
5 only plaintiffs' investigators, but also
6 from Texas Instruments and Dupont, who TI
7 made the switch and Dupont supplied some of
8 the material for the switch. So we've seen
9 some information from them as well.

10 Q. Are you aware of any claims in
11 which Dupont was involved directly or
12 indirectly in the claim or litigation?

13 A. I believe they have been involved
14 in some of the litigation, yes.

15 Q. Are you aware of any incident or
16 situation wherein Dupont participated in
17 the settlement from a financial standpoint?

18 A. You know, I really don't know for
19 sure. I don't typically get involved in
20 the settlement conversation. I'm just the
21 technical person.

22 Q. Do you recall what the
23 allegations of fault or liability were as
24 to Dupont with these switches?

25 A. Not specifically. It varied from

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1 case to case.

2 Q. Do you recall whether or not
3 Dupont was involved because they were a
4 manufacturer of the coating on the diaphragm
5 or disk in the switch?

6 A. They were the supplier of the
7 material to Texas Instruments, I believe
8 that's why their involvement in these cases
9 occurred.

10 Q. Have you seen anything in your
11 claims or investigation or research that
12 would indicate that there was anything
13 wrong either in the material or application
14 of the material supplied by Dupont?

15 A. Not that I've seen, no.

16 Q. You're not aware of anything that
17 would indicate that a potential cause, root
18 cause of the switch failures was related in
19 any way to materials supplied by Dupont?

20 A. Not the material itself, no, not
21 anything that I've seen.

22 Q. And when you say not the material
23 itself, is there anything that you have
24 seen that would potentially incriminate
25 Dupont, if you will, in the switch problem?

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1 MR. RATHER:

2 I'll object to the form.

3 You can answer.

4 THE WITNESS:

5 No.

6 EXAMINATION BY MR. PIPES:

7 Q. Did you participate in any way in
8 the Campbell lawsuit?

9 A. No, not really.

10 Q. And when I say that you didn't
11 ask me what I was asking about, so you are
12 familiar with the Campbell suit?

13 A. I know the name of the case, yes.

14 Q. Why does that one stand out?

15 A. It was, as I recall, one of the
16 first ones that actually went to trial on
17 the subject of this part.

18 Q. That was in Mississippi?

19 A. If my memory serves me correctly,
20 yes, it was in Mississippi.

21 Q. And TI was a party to that suit?

22 A. I'm not sure, I think they were.
23 I'm not certain.

24 Q. Have you ever had an opportunity
25 to review the 28,000 some odd pages of

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1 documents that Texas Instruments has
2 regarding the design and manufacture, sale,
3 of the switch dating back to approximately
4 1990?

5 A. I have never seen anything from
6 Texas Instruments that amounted to 28,000
7 pages, no.

8 Q. Okay. And in all fairness
9 probably out of 28,000 pages, there's
10 probably only 14,000 unique documents.
11 There's a lot of repetition in those
12 documents, but they are Bates stamped. And
13 it's my understanding they were Bates
14 stamped in connection with the Campbell
15 litigation. You've not had the opportunity
16 to see those?

17 A. I don't believe so, no.

18 Q. Okay. What information do you
19 have or have you seen regarding the initial
20 design and manufacturing process and the
21 supply of the switches from Texas
22 Instruments to Ford?

23 A. I did see some documents, very
24 small number of pages, nowhere near the
25 thousands you're talking about that were

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1 entitled Highlights that the Texas
2 Instruments manufacturing people wrote.
3 They are basically one page management
4 summaries of their part's status and these
5 highlights, it appears as if it was an
6 executive summary that was used to review
7 their part's status every week with their
8 management and I did see a set of those.

9 Q. Did those highlights indicate the
10 progression of designing and then actually
11 manufacturing and testing these switches
12 prior to their being shipped to Ford?

13 A. There wasn't, as I recall, this
14 has been a long, long time ago. As I
15 recall, there wasn't a lot of discussion of
16 design because the switch design is really
17 older than this particular application.
18 Texas Instruments has been a pressure
19 switch manufacturer for years, so the
20 design was similar to their other switches
21 if you will, but the documents that I had
22 seen started shortly before the parts were
23 due to be installed on Ford vehicles, so it
24 was more of the manufacturing related kinds
25 of notes that I reviewed.

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1 Q. Are you aware of any changes in
2 the design or manufacture of this switch
3 within 12 months prior to Texas Instruments
4 supplying those switches to Ford?

5 A. Yes.

6 Q. What type of design changes are
7 you aware of?

8 A. I'm sorry. I thought you said
9 design or manufacture was your question.

10 Q. Yes.

11 A. As I say, these documents were
12 pretty close to the launch date, so they
13 spoke predominantly of the manufacture. It
14 sounded from reviewing these documents that
15 Texas Instruments had begun to construct an
16 automated assembly process to build the
17 switches for us because of the volumes that
18 were going to occur after the switches were
19 initially launched. They would be used on
20 subsequent vehicles later on. And so they
21 had decided they needed an automated
22 manufacturing process to be able to make
23 that number of parts.

24 Q. You don't recall any changes in
25 the actual design within 12 months of being

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1 supplied these switches?

2 A. I can't recall the exact dates.
3 They would be on the design drawings. I
4 think there were a couple of minor
5 modifications to the electrical connector,
6 the way it fit together with the wire
7 harness connector. Just some dimensional
8 changes on the drawing. And I can't think
9 of anything else that was actually in the
10 documents that specifically spoke of design
11 changes.

12 Q. Mr. Hoffman, have you ever had an
13 opportunity to go from a point in time of
14 first manufacture of the switch until the
15 present time, if they are still being made,
16 in this particular switch to look at the
17 various design changes through the history
18 of this part?

19 A. As far as I know there have been
20 no significant changes to this part since
21 that time.

22 Q. Okay. Are you aware if the
23 design stayed the same? Are you aware
24 through the progress history of this part
25 whether there were any changes in the

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1 component materials used, materials
2 comprising the components of that switch?
3 A. There were some other versions of
4 the switch. When you say the switch, I
5 assume you mean that was in the '92 or
6 '93 Town Cars, like the vehicle that's
7 involved in this case.
8 Q. Right. What's the part number?
9 A. F2VC9R924, I think.
10 Q. Okay. If I say switch in this
11 deposition, I am referring to that
12 particular switch, the one that was subject
13 to the recall.
14 A. Yes.
15 Q. And if I want to speak of another
16 switch, then I will let you know.
17 A. Okay.
18 Q. Okay. The switch was first
19 manufactured and supplied for Ford in
20 connection with the Crown Vic, Grand
21 Marquis and Lincoln Town Car line in
22 approximately '91?
23 A. November of 1991 on the Town Car
24 was the first time it was used, yes.
25 Q. I would assume that Ford plans

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1 its production years in advance, correct?
2 A. What do you mean by production?
3 Q. Well, for example, Ford didn't
4 say in October of '91 let's use an
5 electronic speed control deactivation
6 switch, give them to us in a month.
7 A. No.
8 Q. Okay.
9 A. It does take several years.
10 Q. So in all likelihood the
11 electronic switch versus the vacuum type of
12 switch was planned at least a year or so
13 prior to November of '91?
14 A. Several years before, yes.
15 Q. Okay. And you've already
16 testified that you're not aware of any
17 substantial or significant changes in the
18 design of that switch from the time that
19 Ford originally received it in '91 until
20 the present time, correct?
21 A. That's correct.
22 Q. Is that switch still purchased
23 from Texas Instruments by Ford?
24 A. I believe it's still being
25 purchased for service.

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1 Q. No change in the design that
2 you're aware of?
3 A. No, sir.
4 Q. If I were to go buy a switch
5 today, the switch, it would be the same
6 exact design as if I had purchased one back
7 in November of '91?
8 A. To the best of my knowledge, that
9 is true, yes.
10 Q. That covers design as far as you
11 are aware.
12 Now, same design but possibly a
13 different supplier of materials or
14 component parts. Are you aware of any
15 changes from original purchase by Ford
16 until the present time?
17 A. The part is what we in the
18 engineering community call a black box
19 design. We contracted with Texas
20 Instruments to design and supply us with a
21 component. We didn't have any input or any
22 knowledge basically of what goes inside
23 that part because they're the pressure
24 switch experts. We went to them, asked
25 them to give us a pressure switch. We at

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1 Ford have really no way of knowing if
2 anything inside the switch itself has
3 changed or not.
4 Q. Okay.
5 A. We don't have control of those
6 internal component pieces, if you will.
7 Q. Or the supplier?
8 A. That's correct.
9 Q. Or the composition?
10 A. That's correct.
11 Q. So your answer would be you
12 personally -- I realize you're not
13 answering today on behalf of Ford -- but
14 you personally are not aware of any changes
15 then in the composition or component
16 suppliers of that switch?
17 A. That's correct.
18 Q. Have you ever heard the term
19 quiet switch?
20 A. Yes.
21 Q. What does that mean to you?
22 A. I believe it was the light truck
23 version of that switch could actually be
24 audibly heard when it was being actuated in
25 some of the prototype vehicles. So the

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1 truck engineers on that version of the
2 design asked Texas Instruments if they
3 could make the actuation mechanism operate
4 more quietly.
5 Q. Do you have any knowledge of the
6 design differences between the switch used
7 in the Ford trucks, light trucks and the
8 Lincoln Town Car?
9 A. Yeah, I believe there are a
10 couple of differences. The actuator
11 doesn't make as much noise. And I am not
12 exactly sure what they did to the actual
13 design of the actuator to make that happen,
14 but there was that change or that
15 difference, I guess you would call it. And
16 then the material that is used for the
17 electrical shell or the electrical half of
18 the switch is different on the truck parts
19 than it is on the F2WC part.
20 Q. What is the material made of in
21 the light truck division?
22 A. You know, I don't recall off the
23 top of my head. I know that it was changed
24 before it went into production.
25 Q. Is it --

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1 A. I can't remember what material it
2 was that they changed to.
3 Q. Is it combustible?
4 A. It's plastic.
5 Q. Do you have an opinion as to
6 whether or not the electrical portion of
7 the switch used in the Town Cars, Crown
8 Vics and Grand Marquises is combustible?
9 A. Any plastic can be raised to a
10 temperature where it would melt and begin
11 to decompose. And the product of that
12 decomposition will be combustible
13 eventually. All plastics will melt and
14 eventually burn.
15 Q. Are you aware of any
16 consideration or testing being given to the
17 possibility of fires related to the switch
18 prior to the switch being incorporated into
19 the Ford vehicles?
20 A. I'm not sure I am clear on what
21 you're asking me.
22 Q. Prior to authorizing the use of
23 this new switch, electronic speed control
24 deactivation switch, I assume that the use
25 of the switch had to pass many tests and

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1 questions posed by engineers at Ford,
2 correct?
3 A. Yes.
4 Q. Have you seen anything or heard
5 of anything wherein the possibility of
6 fires related to that switch was one of the
7 concerns or specific tests?
8 A. I don't recall ever seeing
9 anything having to do with fire, no.
10 Q. Okay. To your knowledge are you
11 aware of any test or studies being
12 conducted regarding the potential hazard of
13 fire associated with that switch prior to
14 those tests and studies associated with the
15 recall?
16 A. Not to my knowledge, no, I don't
17 recall anything.
18 Q. Subsequent to the recall or the
19 NHTSA investigation, are you aware of any
20 tests conducted or studies conducted by
21 Ford with other speed control deactivation
22 switches for other vehicles regarding the
23 potential for fire?
24 MR. RATHER:
25 Object to the form.

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1 THE WITNESS:
2 I GUESS I'm not quite sure
3 what you mean about the potential for
4 fire.
5 EXAMINATION BY MR. PIPES:
6 Q. I know what I mean, I just
7 probably didn't say it. It's my
8 understanding from what documents I've
9 reviewed that the potential for fire with
10 this speed control deactivation switch was
11 never even considered any potential risk of
12 fire, just wasn't a concern in the original
13 design of this switch. When the test and
14 studies and research began in association
15 with NHTSA's inquiry, it was determined
16 that a fire could result from a leaking
17 switch; is that correct?
18 A. That was determined by the recall
19 team, yes.
20 Q. Okay. So my question now is:
21 With that knowledge are you aware of any
22 other tests, research or studies conducted
23 by Ford in association with these speed
24 control deactivation switches, whether they
25 be the same model or not incorporated in

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1 other Ford vehicles?
 2 MR. RATHER:
 3 Object to the form.
 4 THE WITNESS:
 5 Any studies?
 6 EXAMINATION BY MR. PIPES:
 7 Q. Or research or tests?
 8 A. Well, again, they all go through
 9 spec testing, vehicle testing, all sorts of
 10 tests.
 11 Q. I realize that. But that would
 12 have been true had I asked you that in 1992
 13 on this particular switch. No tests were
 14 ever conducted regarding the potential for
 15 fire on this switch until '99.
 16 My question is: Now that you've
 17 had a situation, I want to know if you're
 18 aware of any of these switches, the use of
 19 the switch in any other vehicle line has
 20 been tested specifically for the risk of
 21 fire?
 22 A. I guess I am still not sure what
 23 you're asking. The risk of fire?
 24 Q. Let me just put it in my layman's
 25 terms and see if I can get my point across.

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1 I work for Ford. We have NHTSA
 2 say there's a potential problem with this
 3 vehicle, Ford and Texas Instruments get
 4 together, they do all of the research, they
 5 finally come out with, "Hey, this switch
 6 can fail and leak brake fluid into the
 7 electrical portion of the switch. If the
 8 contacts corrode and there's a short or an
 9 ark under the right circumstances, we might
 10 have a fire in this switch. We've never
 11 even thought about that. But look, here it
 12 is, it can happen."
 13 My question now is: If anybody
 14 turned around and said, "You know, we're
 15 using similar switches in other vehicle
 16 lines, I think now we should go back and
 17 look at all of those and see if we have the
 18 same potential with those vehicle lines,"
 19 that's what I am trying to ask you, was
 20 that ever done?
 21 MR. RATHER:
 22 Object to the form.
 23 THE WITNESS:
 24 All of the other vehicle
 25 lines that have got this switch have

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1 always been reviewed since 99815 was
 2 done. Part of what the recall team
 3 did in 1999 when they were doing their
 4 initial work was look at all of the
 5 applications of all of the versions of
 6 this part. Unless I was
 7 misunderstanding your question, we've
 8 looked at all of them all of the time,
 9 every one of the studies that NHTSA
 10 has requested, we've gone back and
 11 reviewed all of those component parts.
 12 EXAMINATION BY MR. PIPES:
 13 Q. I understand your response. I
 14 want to make sure, I want to go beyond this
 15 particular switch the 924. I'm talking
 16 about has Ford tried to determine if
 17 there's a potential problem in any other
 18 speed control deactivation switch in any
 19 other line of vehicles?
 20 MR. RATHER:
 21 Object to the form of the
 22 question.
 23 THE WITNESS:
 24 Yes.
 25 EXAMINATION BY MR. PIPES:

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1 Q. Okay. Are you aware of any other
 2 tests, studies or research that would
 3 indicate the potential for a fire being
 4 started by a failed speed control
 5 deactivation switch in any other model
 6 vehicle?
 7 A. Again, we've researched and
 8 studied all of those other model years and
 9 vehicle lines every time we've been asked
 10 by NHTSA to re-investigate it.
 11 Q. Okay. And my question was:
 12 Regardless of NHTSA asking you to do it,
 13 once it was determined by Ford that a speed
 14 control deactivation switch failure can
 15 result in a fire, did Ford try to
 16 investigate on its own whether or not there
 17 was a potential problem associated with
 18 these speed control deactivation switches
 19 in other model vehicles?
 20 MR. RATHER:
 21 Object to the form.
 22 THE WITNESS:
 23 Unless I'm totally
 24 misunderstanding, I think I've
 25 answered your question two or three

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1 times. I'm not sure.
 2 EXAMINATION BY MR. PIPES:
 3 Q. You said, "Yes, we have."
 4 A. Yes.
 5 Q. Okay. So even if it wasn't the
 6 924 switch, even if it wasn't a Grand
 7 Marquis or Crown Vic or Lincoln Town Car,
 8 Ford went and looked at, for example, its
 9 Mustangs and/or trucks and said, "Okay.
 10 This one's using a speed control
 11 deactivation switch, do we have a potential
 12 problem here?"
 13 A. We have looked at all of the
 14 other vehicle lines and versions of the
 15 switch.
 16 Q. Okay. Then my follow-up question
 17 was: After doing so, are you aware of Ford
 18 ever finding a potential problem associated
 19 with any other line of vehicles or any
 20 other switch?
 21 A. No.
 22 Q. Okay.
 23 A. I'm sorry. Maybe I wasn't
 24 understanding the question.
 25 Q. That was my question I can assure

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1 you.
 2 I've asked you about your
 3 knowledge of the changes if any in the
 4 design from 1991 to present. I've asked
 5 you about components or component
 6 materials. And I would like to now ask you
 7 what you know about the change in the
 8 manufacturing process from approximately
 9 1991 until present on this particular
 10 switch?
 11 A. I'm really not aware of any
 12 significant changes.
 13 Q. Other than what you already
 14 mentioned, at some point they were trying
 15 to use a fully automated process?
 16 A. They were in the process of
 17 installing and starting up that process at
 18 the beginning, yes.
 19 Q. Okay. Based on all of the
 20 information that you have and all of your
 21 investigations and all of your experience,
 22 do you have an opinion as to the root cause
 23 of the switch failures in the recall
 24 population?
 25 A. Yes.

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1 Q. What is that?
 2 A. My opinion is that there was some
 3 issue with the manufacturing process at the
 4 initial launch of this component that
 5 caused a failure later on in that part's
 6 life that was a rather unique set of
 7 circumstances that allowed the switch to
 8 fail in such a way that it could actually
 9 start a fire.
 10 Q. Let's be more specific. What was
 11 the manufacturing process that allowed a
 12 defective switch to be manufactured? And I
 13 want to make sure we're on the same page.
 14 Is it your belief that some switches were
 15 manufactured in a way that the
 16 specifications did not match the design
 17 specifications?
 18 A. Yes.
 19 Q. So it's your belief that the root
 20 cause of the problem was that because of
 21 some problem in the manufacturing process,
 22 switches were produced that didn't meet the
 23 design criteria?
 24 A. That would not eventually meet
 25 the design criteria.

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1 Q. Okay. Explain what you mean by
 2 that, they would not meet?
 3 A. Well, some of the design criteria
 4 have to do with durability and longevity of
 5 the life of the part, which requires time
 6 as a variable. So until that time or
 7 number of cycles or whatever that measures
 8 life in components had occurred, then the
 9 failure would not have occurred. So
 10 there's a time function, if you will.
 11 Q. Okay. And I want to know
 12 specifically what your opinions are on
 13 that. If in fact there was a flaw in the
 14 manufacturing process that produced a part
 15 that I believe you said would possibly fail
 16 or would have a defect --
 17 A. It would have a condition that
 18 would potentially cause it to fail in such
 19 a way that it could start a fire.
 20 Q. Okay.
 21 A. In the future after many years of
 22 use.
 23 Q. After X-number of cycles or
 24 certain number of -- certain unknown number
 25 of cycles?

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1 A. Either cycles or extremes of
2 temperature, extreme, you know,
3 environmental situation on top of those
4 cycles.
5 Q. If one were to look at two
6 switches immediately after manufacture,
7 would one be able to determine this one is
8 not going to fail catastrophically or
9 result in a fire and this one is?
10 A. No.
11 Q. What was the specific
12 manufacturing problem and what was the
13 result of that manufacturing problem?
14 A. Since, again, this was a black
15 box kind of design, we weren't -- we at
16 Ford Motor Company and our engineers
17 weren't that aware of the actual
18 manufacturing process itself. But from
19 what we've been able to pick up from
20 different reports, it sounds as if there
21 was a crimping operation that was causing
22 the seals to be deformed and that would
23 cause the part to fail before the life
24 cycle test was completed and it would leak
25 brake fluid.

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1 Q. Again, the summary I'm referring
2 to, my summary is that there is some
3 manufacture defect in the seal, it allows
4 brake fluid to leak from the hydraulic side
5 of the switch to the electrical side of the
6 switch, corrosion occurs through some form
7 of arking or shorting, a resistive type
8 heating, a fire may result?
9 A. That's not exactly accurate, but
10 that's what most people have been using to
11 describe it, yes.
12 Q. I want you to give it to me
13 accurately then.
14 A. The corrosion aspect of it takes
15 a long period of time which you didn't
16 mention. It doesn't just happen
17 instantaneously overnight. It requires a
18 long period of time because it's a slow
19 reaction. You also mentioned arking or
20 shorting and it's really not an electrical
21 ark necessarily, it is what would be called
22 a resistive short circuit that is
23 conductive enough to generate enough heat
24 to start the fire.
25 Q. Okay. What would happen if the

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1 Q. And that was the beginning of the
2 failure mechanism?
3 A. That was the failure mechanism at
4 that time, yes.
5 Q. The brake fluid would then leak
6 into the electrical portion of the switch,
7 corrosion may occur and then shorting and a
8 fire?
9 A. As far as the work that was done
10 in 1999 by the recall team, they determined
11 the rest of those steps. The initial issue
12 was just the switches would leak brake
13 fluid which fails the specification
14 testing.
15 Q. Okay. But my summary of the
16 failure mechanism is still what Ford
17 believes or that is still Ford's opinion as
18 to the failure mechanism, correct?
19 MR. RATHER:
20 Object to the form of the
21 question. You can ask him what his
22 opinion is.
23 EXAMINATION BY MR. PIPES:
24 Q. Or is that your opinion?
25 A. That is my opinion, I guess.

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1 corrosion caused the contacts to fail and
2 actually touch each other, would that be
3 considered a direct short?
4 A. No, if contacts touch each other
5 all the time the switch is normally closed.
6 Q. Okay. Is there only one
7 conductor inside that switch, one contact?
8 A. There is one set of contacts.
9 Q. Okay. Is there only one wire or
10 lead to that switch?
11 A. No.
12 Q. Okay. There's two?
13 A. Yes, sir.
14 Q. Does the failure mechanism
15 involve in any way the two wires internally
16 either arking or shorting?
17 A. The two wires, no.
18 Q. Okay. So the heat buildup is
19 from resistant heating at the contacts?
20 A. No. It's between one of the
21 contacts and the base of the switch itself.
22 Q. Okay. And not every switch that
23 leaks brake fluid results in corrosion,
24 correct?
25 A. Correct.

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1 Q. And not every switch that leaks
2 brake fluid and has some corrosion causes a
3 failed switch, correct?
4 A. Well, it will eventually cause a
5 failed switch, that would be one of the
6 failure modes in that part.
7 Q. But there may be some switches
8 out there right now that are still
9 operable, but they have some early stages of
10 corrosion because of leaking?
11 A. They could possibly have
12 corrosion from leaking or just corrosion
13 from actual aging of the part itself.
14 Q. Okay. Have you seen any studies
15 or test results that would indicate how
16 many switches failed due to this
17 manufacturing defect that failed in a safe
18 manner, in other words, no fire versus how
19 many failed catastrophically and resulted
20 in a fire?
21 A. No.
22 Q. Do you know if Ford ever tried to
23 determine how many switches had failed and
24 been replaced that didn't lead or result in
25 a fire?

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1 A. I don't know if anyone's done
2 that or not.
3 Q. Do you have an opinion, just you
4 Mark Hoffman, as to, you know, how many of
5 these would result in fires versus just a
6 failed switch?
7 A. No. I have really no data to
8 back up an opinion of that nature.
9 Q. If you wanted that data, you
10 would want to know either through warranty
11 or service how many switches had been
12 replaced over the years, correct?
13 A. I know the recall team when they
14 studied it, they looked at the warranty
15 data.
16 Q. If the vehicles were replacing
17 switches outside the warranty period, how
18 would you get that data?
19 A. If it's outside the warranty
20 period, it would probably be a little
21 tougher. You would have to — I think the
22 only data that Ford has is how many parts
23 they sell to service, sell for service
24 every year.
25 Q. And then they would have to try

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1 to decipher from that the turnover ratio or
2 how many from the sales records, how many
3 were probably being replaced?
4 A. It would just tell you how many
5 were being purchased. You would have no
6 way of knowing how many of those were still
7 sitting in someone's inventory, whether
8 they have been used, why they have been
9 used, they may have been used because of a
10 collision, for instance, or for some other
11 reason.
12 Q. So it would be difficult to
13 determine the number of failed switches
14 that did not result in fires if in fact
15 they were occurring after the warranty
16 period?
17 A. There is no data available for
18 that kind of a study, no, right.
19 Q. The majority of failed switches
20 under this defect situation would occur
21 after a warranty period, correct?
22 MR. RAITER:
23 Object to the use of the
24 term defect.
25 But go ahead and answer.

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1 THE WITNESS:
2 In the case of 99S15, there
3 is a long period of usage that is
4 required for this type of a failure to
5 manifest itself. So they would
6 typically be outside of the warranty
7 period, yes.
8 EXAMINATION BY MR. PIPES:
9 Q. Okay. Do you have an opinion as
10 to the most common range of mileage wherein
11 the switches have failed?
12 A. I know the recall team looked at
13 it and subsequent studies for the NHTSA
14 reviews have indicated that the vehicles
15 were typically five to seven years in
16 service and again just a range between
17 60,000 and 120,000 miles.
18 Q. You're aware of switch failures
19 that led to fires before — I'm sorry —
20 earlier and later than that range, correct?
21 A. I believe that they were using
22 the data that they had available. I don't
23 think it was all inclusive data so —
24 Q. And I realize that. I am asking
25 you from all your studies, your actual

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1 claim investigations, at others, you have
2 seen switch failures occur before 60,000
3 miles as well as after 120,000 miles, have
4 you not?
5 A. I'm not sure I have seen too many
6 with lower mileage. I've seen quite a few
7 with a lot more mileage.
8 Q. Would you agree with me that
9 given the problem associated with this
10 part, assuming you're correct that it's a
11 manufacturing problem that may manifest
12 itself down the road, the more cycles or
13 the more miles on vehicles the more likely
14 a switch is to manifest a problem if in
15 fact it had a manufacturing problem?
16 A. I'm not sure what you just asked
17 me.
18 Q. Okay. If in fact you are correct
19 that switches are manufactured in a way
20 that there was a problem in the
21 manufacturing process and a problem may
22 result later down the road, that was your
23 earlier testimony, correct?
24 A. In the case of the components
25 that are recalled under 998157

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1 Q. Correct.
2 A. Yes.
3 Q. Given that as true, would you
4 agree with me that a switch containing that
5 problem would be more likely to manifest
6 itself with more miles, the more miles the
7 more likely that problem is to manifest
8 itself?
9 A. No. If the defect were built
10 into the switch, the switch would have been
11 in the population and it would have to have
12 a certain minimum number of miles. I would
13 think, again, that's kind of my opinion
14 based on what I have observed. But it
15 would have had to have been manufactured in
16 that particular time frame when the defect
17 existed in the manufacturing process and
18 then would have had to have gone through
19 some period of years of service as well as
20 miles.
21 Q. And I'm not asking you to comment
22 or give an opinion on whether the recall
23 cut off -- commencement and cut-off dates
24 are accurate or appropriate. Let's assume
25 we have a switch that was made within the

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1 recall period, the manufacturing recall
2 period November of '91 to November 30 of
3 '92, you said you haven't seen that many
4 fail with less than 60,000 miles, correct?
5 A. That's correct.
6 Q. Okay. My question is: In
7 general, it would be more likely for a
8 switch to fail, one of these problem
9 switches, as the mileage increases?
10 And let me just give you an
11 analogy before you answer. We have a
12 problem switch, it was manufactured with
13 the problem and the crimping, for example,
14 it has an unreasonable or higher likelihood
15 of failure because of that, it has the
16 potential of failing, correct, because of
17 that manufacturing defect?
18 A. It has a potential to fail like
19 anything in the world that ages.
20 Q. But it has an increased
21 likelihood of failure because of the
22 manufacturing defect, correct?
23 MR. RATHER:
24 Object to the form.
25 THE WITNESS:

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1 I'm not sure that it
2 increases the probability. Everything
3 wears out, you know, through the
4 course of its life. The unique
5 situation with the switches that were
6 recalled was that the failure of a
7 leak would cause a fire.
8 EXAMINATION BY MR. PIPES:
9 Q. Okay.
10 A. Instead of just causing a worn
11 out switch that needs to be replaced.
12 Q. Okay.
13 A. So I'm not quite sure what you're
14 asking me.
15 Q. That's what I am talking about.
16 The failure, the failure that leads to a
17 fire, okay. If one were manufactured
18 without the crimping problem during the
19 manufacturing process, it's less likely to
20 fail in the future than one that had the
21 manufacturing problem, correct?
22 A. When you say fail, are you
23 talking about failing in such a way that it
24 causes a fire?
25 Q. Yes.

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1 A. Okay. If you're talking about a
2 fire specific case, you could have one that
3 has the defect in it that would have a
4 higher probability of causing a fire than
5 one that didn't have that defect built into
6 it. Is that what you're asking me?

7 Q. Are you saying it could have --
8 yes, I see. Are you saying it could have or
9 it didn't? One switch with a defect and
10 one switch without, they have the same
11 likelihood of causing a fire down the road?

12 A. No.

13 Q. That's my question, that the one
14 with the defect is much more likely to
15 cause a fire than one without the
16 manufacturing defect?

17 MR. RATHER:

18 We need to clarify what you
19 mean by failure. Because to Mark I
20 think failure means stopping the work.
21 And then you might be -- why don't
22 we --

23 EXAMINATION BY MR. PIPES:

24 Q. I'm talking about catastrophic
25 failure, a fire.

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1 A. Talking about a fire, yes.

2 Q. Yes. One that went through the
3 process that was flawed, the manufacturing
4 process that has a problem is much more
5 likely than one that did not have the
6 manufacturing problem to fail
7 catastrophically and cause a fire down the
8 road, correct?

9 A. No. The only ones that have any
10 potential to start fire are the ones that
11 had the defect.

12 Q. Okay.

13 A. Does that answer the question?

14 Q. I said more, you're saying any at
15 all. You're saying the one that didn't
16 have the manufacturing process does not
17 have the potential to cause a fire?

18 A. That's correct.

19 Q. Okay. Then you would agree with
20 me then that if you have one with and one
21 without, the one that went through the
22 manufacturing process with the defect is
23 much more likely if not the only
24 possibility of causing a fire?

25 A. More likely than one that doesn't

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1 have.

2 Q. Yes.

3 A. It's the only likelihood, so yes,
4 it's more likely, I guess, okay.

5 Q. Now, I only want to talk about
6 the ones with the manufacturing defect.
7 Okay. The only ones -- and I'm using
8 manufacturing defect because you said that
9 through some manufacturing process they
10 were made in a way that did not meet the
11 design criteria, correct?

12 A. That's my understanding, yes.

13 Q. Without asking you to assume
14 liability or any type of legal term, I'm
15 going to call those defective, okay, the
16 switches that went through a problem in the
17 manufacturing process. Okay. Given that
18 we're dealing with a defective switch, the
19 more miles you put on that switch, the
20 increased probability of failure results:
21 is that not accurate?

22 A. I think you might be confusing
23 the issue. First of all, not all of the
24 parts built in that time frame had this
25 condition that you call a defect built into

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1 that.

2 Q. I've asked you to assume that it
3 did. Let's eliminate that.

4 A. Now we're talking about the few
5 that did?

6 Q. Yes.

7 A. You're now asking what those --

8 Q. That the likelihood of failure or
9 that problem to manifest itself increases
10 with mileage?

11 A. I'm not sure that there's any
12 data that indicates that it changes its
13 probability of failure, of failing in that
14 way as increased mileage. The switch could
15 fail for other reasons before it ever got
16 to that point where that defect manifested
17 itself in a fire.

18 Q. I'm not asking you for
19 exceptions. I'm asking you generally, is
20 it your opinion if we took a thousand
21 switches that we knew had the crimping
22 problem associated with it, i.e., defective
23 switches, we took a thousand of them, you
24 don't think that there would be any
25 trend -- in ones we've charted their

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1 failure that resulted in a fire, the ones
2 that did, you don't think there would be a
3 trend that shows the more mileage you have
4 on them, the more likely they are to fail?
5 A. I don't really think I can answer
6 that question.
7 Q. You've never done any studies or
8 seen any?
9 A. There's no way of knowing all of
10 the data to analyze that kind of problem.
11 We don't know where they were used, how
12 they were used, the kind of mileage, the
13 kind of brake applications that each of
14 those customers used those parts, so
15 there's just too many other variables.
16 You're trying to simplify it down to one
17 simple variable. You can't do that.
18 Q. Okay. Let's not try to cut this
19 pie too thin. If we're dealing with a
20 defective switch, is it just as likely for
21 that switch to fail at 60,000 miles as it
22 is 150,000 miles?
23 A. I'm really not sure what the
24 overall durability of the part is with that
25 defect. I don't know. I'm not familiar in

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1 any way with any specific data.
2 Q. How many alleged speed control
3 deactivation switch fires have you
4 personally investigated?
5 A. I am not sure off the top of my
6 head. I think it's 150 to 200, something
7 on that order.
8 Q. Okay. Have you ever gone with
9 any of the other design analysis engineers
10 to discuss how many they have looked at?
11 A. Not until just recently with
12 collecting files, but I have handled the
13 vast majority of them myself.
14 Q. Okay. I believe I depose
15 Mr. Sharma the other day. He thought that
16 he had investigated approximately 200 to
17 300 alleged switch fires. Does that sound
18 correct or accurate to you, if you know?
19 MR. RATHER:
20 I'm going to object. I
21 think that mistakes the testimony, but
22 if you know --
23 THE WITNESS:
24 I would find that highly
25 unlikely.

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1 MR. PIPES:
2 Okay. Let's go off the
3 record for a minute.
4 (Whereupon the proceedings went
5 off the record.)
6 EXAMINATION BY MR. PIPES:
7 Q. I apologize. Off the record, it
8 was Larry Halton that told me he had
9 investigated 200 or 300.
10 But you feel like you've taken a
11 majority of the alleged switch claims for
12 Ford?
13 A. Yes.
14 Q. And you've investigated how many?
15 A. Again, I don't keep score. I
16 believe it's around a couple hundred.
17 Q. Of those couple hundred
18 investigations, how many have you either
19 individually or collectively with other
20 experts determined that the speed control
21 deactivation either was or could have been,
22 i.e., can't be eliminated as the cause of
23 the fire?
24 A. Again, I don't keep score, so it
25 would just be a guess. I don't know off

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1 the top of my head. Say somewhere between
2 50 and 75 percent, I guess. I don't know.
3 Q. Either were or could have been
4 the cause of the fire?
5 A. Yeah, I guess. I would rather
6 not give you a number but --
7 Q. Well, by your testimony, and I'm
8 not trying to hold you to a specific
9 percentage, but by your testimony that
10 would mean the converse being that between
11 25 and 50 percent definitely were not the
12 cause of the fire in those claims that
13 you've investigated?
14 A. Obviously, the other percentage
15 would be ones that were not, yes.
16 Q. Okay. And I guess my question is
17 then with as many as you have investigated
18 and have opinions on have you ever tried to
19 gather those files together and chart out
20 any type of trends or analyze the data that
21 you have 200 claims to try to see if it's
22 more or less likely in vehicles with
23 X-number of miles or in these particular
24 climates or anything or is that something
25 Mark Hoffman has no time for?

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1 A. I have not had the time to
2 actually lay it out and graph it.
3 Q. Right. But you could have?
4 A. As far as the time in service and
5 mileage, if that information was available,
6 it's relatively straightforward to do.
7 Q. And I guess that's what NHTSA
8 wanted your files for. Is that what they
9 are going to do with them, you think?
10 A. I really don't know what NHTSA
11 has planned for the files.
12 Q. In the files that you have
13 provided to NHTSA when you made copies, do
14 those, do the copies of your files contain
15 your opinions as to whether or not the
16 switch was or was not the cause of the
17 fire?
18 A. If I had rendered an opinion in a
19 case, it would probably be in that file,
20 yes.
21 Q. Okay. Do you know how many
22 claims were involved in the analysis for
23 the scope of the recall back in '99?
24 A. How many claims?
25 Q. Right.

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1 A. I don't know the exact number. I
2 know it was a lot, a very large pile of
3 paper was reviewed by the recall team.
4 Q. I guess what I mean is, what I
5 want to know specifically is how many
6 claims were known and actually analyzed in
7 determining the cut-off dates of
8 manufacture of November of '91 and
9 November 30 of '92?
10 A. When you say claims you're not
11 talking about insurance claims or you're
12 talking about any customer complaint?
13 Q. Anyone making a claim that this
14 fire was caused by a defective speed
15 control deactivation switch, no matter what
16 its source, do you know how many were
17 analyzed to determine that, the scope of
18 the recall?
19 A. Back when the recall team was
20 working on this problem, they weren't even
21 aware to start with of what component part
22 was of concern. They were actually looking
23 at five or six different component parts in
24 that general area of the vehicle. I'm not
25 sure exactly what you're looking for. They

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1 looked at thousands of complaints and
2 comments that had come in from customers
3 that were in our customer service data
4 bases to try and determine, first of all,
5 which component part it was that was
6 causing the fires.
7 Q. You're not personally aware of
8 exactly what data this team reviewed in
9 actually coming up with the November '91 to
10 November '92 cut-off dates for the recall?
11 A. I have discussed the work that
12 they did and I saw some of the forms that
13 they had reviewed.
14 Q. Okay. You've seen Attachment A
15 to the response to NHTSA, have you not?
16 The graph that shows the number of claims
17 for each month of production beginning in
18 sometime in '91 and running out through say
19 '93 or '94?
20 A. I don't know if I have.
21 Q. Okay.
22 A. I've seen a lot of graphs. I
23 don't know which one you're talking about
24 specifically.
25 Q. It was called Attachment A to

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1 Ford's response to NHTSA. And it was a
2 graph showing that they had looked at
3 approximately 110 underhood Town Car fires.
4 A. This was the original response?
5 Q. Yes. You've seen that graph?
6 A. I think we talked about it in one
7 of my earlier depositions, didn't we?
8 Q. We might have.
9 A. It's in what's called the 14D or
10 the white paper, is that what -- there's a
11 couple of graphs in there. I think one is
12 by mileage, one is by --
13 Q. By manufacturing date?
14 A. It was manufacturing date.
15 Q. And those are the graphs I'm
16 referring to now.
17 A. Okay.
18 Q. Do you know if Ford has ever gone
19 back now that we're -- now that everyone's
20 aware that there's more than these 110
21 alleged underhood fires of trying to
22 regraph all of that information to
23 determine if those production commencement
24 and cut-off dates were sufficient?
25 MR. RATHER:

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1 Object to the form.
 2 THE WITNESS:
 3 As I understand, that has
 4 been done twice since then.
 5 EXAMINATION BY MR. PIPES:
 6 Q. All right. Have you been shown
 7 the results of those studies or
 8 investigations?
 9 A. I have been in meetings where it
 10 has been reviewed. I haven't actually, you
 11 know, seen it enough to remember much of it
 12 other than the fact that it has supported
 13 the original recall team's findings every
 14 time it's been redone.
 15 Q. And the recall was based on
 16 trends, not necessarily incidents of fire.
 17 Have you investigated any fires wherein you
 18 found that the cause of the fire was a
 19 speed control deactivation switch in a
 20 vehicle manufactured outside of the recall
 21 date?
 22 A. Back to the beginning of the
 23 question, you said something I didn't quite
 24 understand. You said it was based on
 25 allegations not —

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1 Q. The graph that was in the
 2 attachment, that graph reflected the number
 3 of alleged underhood fires in Ford
 4 vehicles, correct?
 5 A. Yes.
 6 Q. Okay. Do you know if every one
 7 of those fires reflected in that graph were
 8 investigated by Ford?
 9 A. No, I don't.
 10 Q. So you also don't know if every
 11 one of those graphed on there were
 12 determined to be caused by a speed control
 13 deactivation switch, correct?
 14 A. That is correct.
 15 Q. Okay. On that graph it also
 16 shows incidents outside the recall date,
 17 correct?
 18 MR. RATHER:
 19 Again, you can go on and ask
 20 him about it. He doesn't have the
 21 graph in front of him. I hate to have
 22 him questioned on a graph that he
 23 can't see. He might be wrong. You
 24 can ask him general questions without
 25 that graph in front of him.

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1 EXAMINATION BY MR. PIPES:
 2 Q. Let me just ask you, do you know
 3 in Ford's investigation or in its response
 4 to NHTSA whether in fact there were
 5 incidents that occurred outside of the
 6 November '91 to November '92 manufacturing
 7 dates?
 8 A. What do you mean by the -- mean
 9 by the use of the term incident?
 10 Q. Alleged fires in vehicles
 11 manufactured out of that date.
 12 A. There have been allegations.
 13 You're quite aware of them.
 14 Q. Yes, but at that time, even back
 15 in '99 at the time of the recall Ford was
 16 aware of allegations of switch fires in
 17 vehicles manufactured outside of those
 18 dates.
 19 MR. RATHER:
 20 Object to the form of what
 21 Ford was aware of. Mark, answer what
 22 you know. But what Ford was aware —
 23 THE WITNESS:
 24 You're kind of jumping back
 25 and forth in time and back and forth

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1 in graphs. I'm not sure.
 2 EXAMINATION BY MR. PIPES:
 3 Q. Let me ask you this then. Do you
 4 know back in '99 when Ford cut the
 5 commencement and cut-off date of its
 6 vehicles whether or not they were aware of
 7 any alleged switch fires in vehicles that
 8 would have fallen outside of that range?
 9 MR. RATHER:
 10 Object to the form of the
 11 question. You asked him what Ford
 12 knew.
 13 MR. PIPES:
 14 No, I asked him what he
 15 knows.
 16 THE WITNESS:
 17 In 1999 the recall team
 18 investigated initially the Town Car,
 19 the Crown Vic, the Grand Marquis,
 20 because that was the initial request
 21 from the National Highway Traffic
 22 Safety Administration. They looked
 23 at -- I believe it was about five
 24 different component parts to try and
 25 determine what was the cause of these

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1 fires. They determined this switch
2 was one of them. They then looked at
3 all versions of the switch used by
4 Ford until 1999, which is the date
5 they were doing this study and all
6 vehicle lines that used all of those
7 switches up until 1999 to begin to try
8 and identify what population would
9 need to be recalled. They looked at
10 the same type of data they looked at
11 for the Town Car, Crown Vic, Grand
12 Marquis on all of these other
13 vehicles, the same type of reports and
14 didn't see the same trend that they
15 saw in the customer complaint reports
16 that they looked at for the Town Car,
17 Crown Vic and Grand Marquis.

18 EXAMINATION BY MR. PIPES:

19 Q. We're on different pages but that
20 may have been a future question.

21 My question is simple. And let
22 me just break down and try to tell you what
23 I'm after. Back in '99 when Ford was
24 investigating these underhood fires, they
25 eventually determined that these fires were

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1 caused by these switches, correct?

2 A. Yes.

3 Q. Okay. They then looked at, they
4 charted the manufacturing date of the
5 vehicles in these alleged underhood fires
6 and determined that a great majority, but
7 not all of the fires occurred within a
8 certain time frame. And they then used
9 that range as the commencement and cut-off
10 date for the recall, correct?

11 A. They used the data that they got
12 from reviewing those reports to determine
13 the end date. The beginning date was when
14 they first went into production, that was
15 the very start, so that the front and isn't
16 in question.

17 Q. That's a given?

18 A. That's the first time they ever
19 showed up.

20 Q. The cut-off date that was used,
21 are you aware of any claims back in the '99
22 time frame that fell beyond or outside the
23 November 30, '92 manufacturing cut-off
24 date?

25 A. Again, I would want to refer back

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1 to that chart to make sure. I believe they
2 looked at everything up to the current
3 information that was available to them in
4 '99.

5 Q. Okay.

6 A. I mean they didn't just stop
7 looking at claims.

8 Q. No. No. No.

9 A. That's what it sounds like you
10 were asking me.

11 Q. When the recall was issued, it
12 had a specific cut-off date for vehicles
13 manufactured prior to November 30, '92,
14 correct?

15 A. Yes.

16 Q. That was the cut-off date. I'm
17 simply asking you if you know whether or
18 not Ford was aware of any claims that would
19 have fallen beyond or outside that
20 November 30, '92 cut-off date?

21 MR. RATHER:

22 Object. You're asking him
23 what Ford was aware of. You're
24 putting it in terms of what does he
25 know Ford was aware of. I don't know

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1 if he can answer that in today's
2 deposition.

3 EXAMINATION BY MR. PIPES:

4 Q. To the extent you can and then
5 the follow-up would be if you know, do tell
6 me how you know. The obvious answer to
7 that is you've seen documentation. I in
8 fact have seen documentation, the graph
9 itself that we don't have here
10 unfortunately that shows incidents of fire
11 in the Crown Vics, Lincoln Town Cars, Grand
12 Marquises that are manufactured outside of
13 November 30 of '92. After November 30 of
14 '92, I'm simply asking if you are aware of
15 that.

16 A. From what I recall, what the
17 recall team did, they reviewed all customer
18 concerns that had to do with any of the
19 symptoms that they suspected that might
20 indicate that there was a fault occurring
21 and that would have been anything up to
22 whatever that current day was in 1999 when
23 they were reviewing that pile of concerns
24 that they were looking at. Some of them
25 were after that date. Some of them were

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1 before that date, that range of time. They
 2 went before it and they went after it so
 3 they could make sure of what you call a
 4 noise level. On any kind of data, you're
 5 going to have a noise floor or noise level
 6 where there's always going to be a common
 7 number of events of certain things that
 8 you're trying to measure and you want to
 9 make sure that you are -- that you're not
 10 including that noise, if you will, or that
 11 inaccuracy in your conclusions. So they
 12 had data from before the switch even
 13 existed that showed what the normal
 14 tendency was having an allegation about one
 15 of these vehicles having a problem with
 16 this particular, you know, area and they
 17 wanted to know what that number was so that
 18 when that number returned, they knew that
 19 they had captured the population. That is
 20 why there are some of those numbers after
 21 the end of the recall date, that's just
 22 normal trend that you might see --

23 Q. Okay. All right.
 24 A. -- in any of that data.
 25 Q. Then you are aware that there was

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1 some noise or allegations, incidents
 2 occurring outside of the recall date?
 3 A. I would call that the noise.
 4 That's the normal incidents for any other
 5 reasons that are possible. And that's just
 6 a standard practice when they are trying to
 7 define a recall population, they need to
 8 know what is the normal rate before and
 9 when does it return to that normal rate of
 10 occurrence. That's how you tell when
 11 you've captured the population.

12 Q. Of the approximate 200 alleged
 13 switch fires that you have investigated,
 14 how many have you found the switch to have
 15 been the cause of the fire and that switch
 16 was located in a vehicle with a
 17 manufacturing date after November 30 of
 18 '92?

19 A. So you're asking me if I've ever
 20 seen a vehicle out of the population where
 21 I suspected the switch started the fire?
 22 Q. Yes.
 23 A. I don't recall any case of that
 24 nature without some other, you know,
 25 alteration to the vehicle having been

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1 performed as well.
 2 Q. How many do you think that you
 3 have seen outside the November 30, '92 date
 4 that might have also involved some type of
 5 alteration or misuse or some other factor
 6 wherein, yes, the switch caused the fire
 7 but there was some type of alteration or
 8 misuse?

9 A. I would say only a couple that I
 10 can think of.

11 Q. Of the 200 approximate switch
 12 fires that you have investigated, how many
 13 of those investigations involve vehicles
 14 manufactured after November 30 of '92?

15 A. How many after November of '92
 16 that I have looked at?

17 Q. Uh-huh (indicating affirmatively).
 18 A. That have that allegation?
 19 Q. Yes.
 20 A. Again, I don't know. I don't
 21 keep score. I am really not sure, to be
 22 honest with you.
 23 Q. That's one of the most
 24 significant things you look for to see if
 25 it's inside or outside of the recall

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1 period?
 2 A. I try to approach all of my cases
 3 very objectively. If someone alleges it's
 4 a speed control deactivation switch, I try
 5 to approach it just as objectively as if it
 6 were in or out of the population.

7 Q. Do you have an opinion as to
 8 whether or not all of the potential problem
 9 switches would have been weeded out prior
 10 to November 30 of '92?

11 A. Yes, I have an opinion.
 12 Q. What is it?
 13 A. That they were all significantly
 14 well within that population.

15 Q. Okay. So you don't think that
 16 any vehicle manufactured after November 30
 17 of '92 would have had -- could have had a
 18 potential defective switch?

19 A. I have not found anything that
 20 would indicate anything to the contrary.
 21 Q. Okay.
 22 A. Unless someone took a switch out
 23 of an old vehicle and put it into a
 24 different one.
 25 Q. Okay. So you think that at some

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1 point Texas Instruments remedied the
2 manufacturing problem and that completely
3 eliminated this switch defect or potential
4 for causing fires?
5 A. That's what everything that I
6 have seen indicates to me, yes.
7 Q. Have you ever seen a document or
8 any other information that would reflect
9 exactly what the problem in the
10 manufacturing process was?
11 A. Not specifically. There were
12 some comments made in some of those
13 highlights documents that we talked about
14 earlier, but not enough detail to know
15 exactly what was going on at the time.
16 Q. There was a known date when Texas
17 Instruments remedied the problem and the
18 switches manufactured after a certain date
19 have no potential or problem associated
20 with them?
21 A. There isn't a clear delineation
22 of that that I am aware of.
23 Q. How often are you able to read
24 the manufacturing date of the switch after
25 a fire?

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1 A. Fairly often I would say.
2 Q. More often than not?
3 A. I would say more than half of
4 them, if the switch isn't too damaged, you
5 can find it and read the date code.
6 Q. Have you tried to analyze that
7 information to determine if there's any
8 trend in the manufacturing date of the
9 switch itself and the number of claims
10 you've investigated?
11 A. Again, just, you know, in a
12 general way, not actually sitting down and
13 laying out a graph, but it does appear that
14 the parts that have an earlier date seem to
15 have a higher probability of being involved
16 in a fire and possibly being the cause of
17 that fire.
18 Q. An earlier date than what?
19 A. The earlier portion of the recall
20 population, the November of '91 to -- I
21 don't know. I would say maybe April or May
22 of '92. That's why that's about half. The
23 first half, if you will, of the population
24 seems to contain a vast majority of the
25 incidents, you know, components that were

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1 made in the first half of the population.
2 Q. Do you know if it was ever
3 determined when all of the switches must
4 have been used or discarded or was that
5 even possible?
6 A. I know it was looked at, you
7 know, a couple of instances, but because of
8 the difference in handling of the component
9 depending on which car line it was going
10 into, it made it kind of difficult to be
11 able to delineate that.
12 Q. Do you even know whether the Ford
13 plant manufacturing the Crown Vics, Lincoln
14 Town Cars and the Grand Marquis use some
15 type of FIFO system in its production?
16 A. Well, there's two different
17 plants involved, first of all. And I would
18 imagine any manufacturing, when I was in
19 manufacturing engineering you do try to use
20 a first-in-first-out kind of a process, but
21 I don't think it was held too religiously.
22 But I think that would be the tendency,
23 yes.
24 Q. Okay. You merely copied your
25 files and sent copies to the NHTSA.

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1 correct?
2 A. No, I didn't. I turned them over
3 to our office of general counsel's
4 discovery department. They take care of
5 all of the copying and shipping and
6 whatever.
7 Q. Okay. If you wanted to, you
8 could still go back on the files that
9 you've handled and graph out, if you will,
10 the date of manufacture in the vehicle
11 involved as well as the date of manufacture
12 of the switches that were located if
13 discernible?
14 A. It's possible. I believe the
15 data is in the files although it's rather
16 skewed data. I'm not sure what it would
17 tell me.
18 Q. You mentioned earlier that you
19 believe you've only found two or three
20 fires caused by switches in vehicles
21 manufactured after November 30 of '92 and
22 those would have involved some other
23 factor, correct?
24 A. It appears in all of those cases
25 that the switch had just failed at the end

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1 of its normal life. And the problem was
2 misdiagnosed and the fusing had been
3 replaced with larger fuses which then
4 caused the switch to continue to fail. It
5 had blown a fuse. Basically the switch had
6 failed, blown a fuse like it should and the
7 vehicle was misdiagnosed or someone had
8 made an alteration to the vehicle where
9 they increased the size of the fuse in the
10 first place, so that the switch really
11 didn't have the fusing protection that was
12 designed into it originally, so it became
13 overstressed, overloaded electrically
14 because the fuse was too large.

15 Q. Are those claims still pending?

16 A. I don't know. It's up to the
17 legal office as to whether they are settled
18 or not.

19 Q. Are your files still open on
20 those two or three?

21 A. I'm not really sure if they ever
22 became actual case files. They were, I
23 guess, what you would call early warning.

24 Q. Have you tried to determine
25 either from information available to you or

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1 from your specific files your claims on how
2 many occasions the fuse is blown versus --
3 or open, versus not in connection with
4 these claims?

5 A. Well, if the fuse box has
6 survived the fire, it's something that most
7 good fire investigators will try to take a
8 look at. It's sometimes difficult to draw
9 conclusions from it because of the damage
10 to the wiring because of the fire. I mean,
11 a blown fuse doesn't necessarily mean a
12 short circuit before the fire, it could
13 have been a short circuit because of the
14 fire, but it should go -- you should take a
15 look at that.

16 Q. Regardless of the cause of the
17 blown fuse, can you tell me how many
18 occasions wherein it was discernible
19 percentage-wise that you found the fuse to
20 be blown?

21 A. No, not really. There are so
22 many other cases where the fuse isn't --
23 doesn't even survive the fire, it's not
24 something that I think about numbers-wise
25 because it is not there enough to think

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1 about.

2 Q. Do you have an opinion as to
3 whether or not this switch can -- the
4 defective switcher can fail and cause a
5 fire without blowing or opening the fuse?

6 A. It appears in some cases that it
7 has been able to do that without blowing
8 the standard sized fuse, the switches that
9 were in the population.

10 Q. And that system is designed
11 around a 15-amp fuse?

12 A. Yes.

13 Q. Okay. If it is possible for the
14 switch to have resistive heating without
15 opening a 15-amp fuse, then it would
16 certainly be able to do the same thing with
17 a 20-amp fuse, correct?

18 A. Yes.

19 Q. Okay. What have you done in
20 connection with this particular claim, the
21 claim of the Sims?

22 A. I inspected the switch remains
23 that Mr. Stringer had removed from the
24 vehicle when he did his inspection.

25 Q. When was that done?

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1 A. That was done sometime in
2 calendar year 2002. I think it was April,
3 if I remember correctly.

4 Q. Where was that done?

5 A. At his -- at Mr. Stringer's
6 office here in Metairie.

7 Q. Okay.

8 A. If I remember correctly.

9 Q. What else have you done?

10 A. Then we were able to track down
11 the remains of the vehicle at a salvage
12 yard or I'm not sure if it was a salvage
13 yard, it was a rather rustic looking place
14 out in Pearl River, Louisiana. And I went
15 out there this past -- again, it's just a
16 guess -- I think it was February of this
17 year, March of this year, something like
18 that. And I inspected the remains of the
19 vehicle there.

20 Q. Who accompanied you on that
21 inspection?

22 A. No one.

23 Q. You were by yourself?

24 A. Yes, sir.

25 Q. Did you photograph it?

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1 A. Yes, sir.
 2 Q. Did you photograph the switch at
 3 Mr. Stringer's office?
 4 A. Yes, I did.
 5 Q. What else have you done?
 6 A. Well, unknown at the time I
 7 inspected the fire scene itself sometime
 8 after this incident had -- the repair work
 9 had begun on their home.
 10 Q. When was that done?
 11 A. That was shortly after the fire,
 12 I guess. I can't recall. I was here at
 13 the request of the Baton Rouge Fire
 14 Department looking at several vehicles with
 15 one of their investigators and this case
 16 happened -- this is before it was a
 17 lawsuit, this happened to be one of the
 18 vehicles that the Baton Rouge Fire
 19 Department asked us to assist with.
 20 Q. So the Baton Rouge Fire
 21 Department contacted Ford prior to State
 22 Farm?
 23 A. Actually, I think it was a
 24 newspaper article in Baton Rouge that the
 25 Ford public relations people got a hold of

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1 and contacted us and then we contacted the
 2 Baton Rouge Fire Department.
 3 Q. So Ford was aware of the fire
 4 probably the next day when it was published
 5 in the newspaper?
 6 A. No, the story had to do with a
 7 series of them over a period of time, so I
 8 don't recall chronologically how long it
 9 was. I know by the time I got to Baton
 10 Rouge, the Sims' house was already being
 11 rebuilt and reconstructed and the vehicle
 12 was nowhere to be found. So it was a
 13 matter of months at least.
 14 Q. Was it the newspaper article
 15 after the Cook fire or do you recall?
 16 A. Well, again, I don't recall the
 17 actual chronology. There were three or
 18 four cases that the Baton Rouge fire
 19 investigator and I worked on at the same
 20 time and Cook is another name that sounds
 21 familiar.
 22 Q. That was Barry Mounds that
 23 contacted -- that was contacted at the fire
 24 department?
 25 A. I think initially we had to

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1 contact Mr. Mounds because he was their
 2 public relations person or something and
 3 then he put us in touch with the actual
 4 fire investigators themselves.
 5 Q. That was Bailey Carter?
 6 A. Yes. We remembered Bailey's
 7 first name. We couldn't remember his last
 8 name. But yeah, Bailey Carter was the
 9 investigator I was working with.
 10 Q. After the initial contact with
 11 the fire department were there any
 12 subsequent fires in which the fire
 13 department contacted Ford, said we've had
 14 another one?
 15 A. You know, I can't remember all of
 16 the details. I know that I came down and
 17 did a couple of different inspections with
 18 him. But I don't recall if there were any
 19 additional ones. I think he had an old
 20 case that they brought out of the archives
 21 that we looked at, but then we realized it
 22 wasn't involved in the same situation.
 23 Q. Other than looking at the switch
 24 remains and looking at the vehicle and
 25 going to the Sims residence sometime

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1 immediately after the fire, but date
 2 unknown, have you done anything else in
 3 connection with this claim?
 4 A. My standard review of all of the
 5 Ford sales and service records that I could
 6 find and looking at the actual model year
 7 of this vehicle and anything that was
 8 unique possibly to its design.
 9 Q. What was the manufacturing date
 10 of the Sims vehicle?
 11 A. I don't recall exactly. Let me
 12 take a look here. The build date was
 13 July 29, 1993.
 14 Q. That would be outside of the
 15 recall population, correct?
 16 A. Yes, sir.
 17 Q. What have you determined, if you
 18 have, to be the origin of this fire?
 19 A. The driver's side of the engine
 20 compartment rearward in the engine
 21 compartment.
 22 Q. What do you believe to have been
 23 the cause of this fire?
 24 A. There was an aftermarket wire
 25 found stuffed through a hole in the dash

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1 panel.
2 Q. The hole in which the speedometer
3 wire or cable ran?
4 A. No. There is nothing in that
5 hole normally, I don't believe.
6 Q. It's just an open hole?
7 A. It's just a drain hole or a
8 taking hole that has a plug put in it, I
9 believe. There was a single strand of wire
10 hanging through that hole.
11 Q. Who located that wire initially,
12 you or Mr. Helton?
13 A. I think if I remember the
14 chronology correctly, I saw the vehicle
15 before he did. I think I was the one who
16 found the wire.
17 Q. Did you photograph it?
18 A. Yes, sir.
19 Q. Have you provided Mr. Helton with
20 those photographs?
21 A. I do believe he saw those
22 photographs.
23 Q. May I see them, please? Have you
24 spoken to Mr. Helton about his
25 investigation?

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1 A. Well, just insofar as he wanted
2 to take a look at these pictures because I
3 think he had a copy of them or something.
4 I guess you had shown him some pictures.
5 He wasn't sure where they came from, so he
6 was asking me.
7 What pictures did you want
8 precisely?
9 Q. Well, I will look at them in just
10 a minute. Let me get this straight.
11 You didn't speak to Mr. Helton
12 about this particular claim until after I
13 took his deposition?
14 A. No. I talked to him twice. Once
15 he asked me if he could look at my
16 photographs, I showed him. And then once
17 subsequent to that we got — both of us I
18 think got copies of Mr. Stringer's
19 photographs. I assume they came from your
20 office.
21 Q. All right. So both times,
22 instances in which you have spoken to
23 Mr. Helton, that occurred after his
24 deposition?
25 A. I think one was before and one

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1 was after. I mean, his deposition was last
2 Monday, I guess. Is that correct?
3 Q. I believe. It's been within the
4 last week or so. But if he was asking you
5 to see your photographs because I had asked
6 him about it, then it must have been after
7 the deposition, correct?
8 A. I don't know.
9 Q. Okay. Had you ever received an
10 opinion from Mr. Helton as to his finding
11 as to cause or origin?
12 A. Not me personally.
13 Q. Okay. You've never asked him for
14 his opinion?
15 A. That's not what I do. That's a
16 lawyer's question to him, not my question
17 to him.
18 Q. You didn't ask him when you spoke
19 to him what did you find during your
20 investigation as to either origin or cause
21 or both?
22 A. I don't believe we ever talked
23 about origin and cause. We talked about
24 some of the observations we both made.
25 Q. At one point you had provided

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1 Mr. Helton with copies of your photographs,
2 not reprints, but just copies, color
3 copies?
4 A. I'm not sure if he got a set of
5 color copies or not.
6 Q. At his deposition he only had
7 photocopies of photographs. He doesn't
8 have reprints. You supplied him with
9 actual photographs after his deposition?
10 A. No, I showed him this set in
11 front of me.
12 Q. Personally?
13 A. Yes.
14 Q. When did that take place?
15 A. We were at the firm seminar in
16 West Virginia. Before he went home we went
17 through these photographs.
18 Q. Okay. So that occurred in West
19 Virginia on what date?
20 A. The 4th of September.
21 Q. Had you already provided him with
22 copies at that point, photocopies?
23 A. I hadn't, no. Sounds like, from
24 what you were saying, somebody did give him
25 a set of copies of these.

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1 Q. Okay. What did you determine if
2 anything from your visual inspection of the
3 switch at Mr. Stringer's office?

4 A. I really did not at that time or
5 even subsequent to it have much of an
6 opinion at all. I was mildly surprised
7 there was as much of the switch remaining
8 and I also got the date code so that I
9 could verify when the part was made.

10 Q. When was the part made, do you
11 recall?

12 A. I would have to look at those
13 photos. I don't recall off the top of my
14 head. The date code was the 152nd day of
15 1993 so somewhere around May of 1993.

16 Q. Okay. If in fact the switches
17 have a date code on them, why was the
18 recall not tied to manufacturing date of
19 the switch rather than the manufacturing
20 date of the vehicle?

21 A. Because Ford makes vehicles and
22 we recall vehicles, so we use vehicle build
23 dates.

24 Q. Okay. Ford has never issued a
25 recall in which one were to simply look at

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1 the date of component part manufacture, the
2 date of manufacture of the component part
3 rather than the date of manufacture of the
4 vehicle?

5 A. I have no idea what other recall
6 teams do.

7 Q. All right. Have you ever
8 expressed your opinion as to the cause of
9 this fire to anyone associated with Ford?

10 A. Other than our legal counsel, no.

11 Q. Okay.

12 A. That I can think of.

13 Q. Had you advised legal counsel of
14 your opinion as to origin and cause prior
15 to Mr. Melton's inspection of the vehicle?

16 MR. RATHER:

17 Object to this — don't
18 answer that, that asks for
19 attorney-client privilege. What his
20 conversations with Ford's legal
21 counsel were are absolutely
22 privileged. I instruct you not to
23 answer that question.

24 EXAMINATION BY MR. PIPES:

25 Q. When did you first complete your

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1 opinion or reach an opinion as to the
2 origin and cause of this fire?

3 A. Again, I was pretty much
4 following my standard procedure that I do
5 on these cases. I wait until I have my
6 photographs back and analyze those in
7 detail and make sure that, you know, I've
8 looked into all of the possible causes that
9 I could determine based on what I see in
10 all of these photographs. So sometime
11 after that inspection I would say.

12 Q. That occurred back in February of
13 2002?

14 A. No, I think that was 2003. I
15 looked at parts in 2002. I looked at the
16 vehicle in 2003, I think. I would have to
17 go back and doublecheck my calendar to make
18 sure.

19 Q. You don't have anything in your
20 file to reflect when you went and looked at
21 it?

22 A. I don't think I do.

23 Q. What is in your file, by the way,
24 other than these photographs?

25 A. A copy of the lawsuit, the

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1 vehicle information.

2 Q. May I see the vehicle
3 information, please?

4 A. We got sales and service
5 information.

6 MR. PIPES:

7 I would like to copy this in
8 globo and mark it as MHI.

9 THE WITNESS:

10 And then any engineer or
11 technical stuff that I've used, you
12 know, to review.

13 EXAMINATION BY MR. PIPES:

14 Q. Okay.

15 A. Here's an extra copy. You don't
16 need to copy that if you want.

17 Q. You are referring to 13-13 power
18 distribution for this vehicle?

19 A. Yeah, there were some excerpts
20 that I took out of the Electrical and
21 Vacuum Troubleshooting Manual of the
22 vehicle electrical schematic. Is that what
23 that is, Mr. Pipes?

24 Q. Yes.

25 A. Is that in that, this picture?

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1 Q. You're referring to a document
2 entitled Circuit Protection Fuse Panel. It
3 is not. 11-4.
4 A. All right. I thought this was a
5 copy of this. Why don't you take this
6 stuff and give me that back?
7 Q. All right. You have provided me
8 with five pages from the service manual.
9 Is this from the 1993 Lincoln Town Car?
10 A. It's from the Electrical and
11 Vacuum Troubleshooting Manual, which is
12 from the service manual.
13 Q. And you have provided me with
14 11-4, 13-13, 87-1 and 87-2 from that
15 manual.
16 A. Yes, sir.
17 Q. On your document 11-4, you have
18 circled fuse position number 11 as well as
19 highlighting it and someone has written
20 blown out the side; is that your handwriting?
21 A. Yes, sir, it is.
22 Q. Why did you write that?
23 A. Fuse 11 in the interior fuse
24 panel had been open circuited, which I
25 discovered in my inspection. And so when I

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1 got back, I looked at what circuits Fuse
2 Number 11 protected and that's my
3 highlighted notes.
4 Q. And you have highlighted Fuse
5 Position 12, which is the 15-amp fuse that
6 serves the speed control as well as other
7 systems, correct?
8 A. Yes, sir.
9 Q. Was that open or closed?
10 A. It's not noted, so it was still
11 intact.
12 Q. Had it been blown, you probably
13 would have written blown out beside it as
14 well?
15 A. Probably, yes, sir.
16 Q. Did you photograph the fuse in
17 connection with your inspection?
18 A. I believe so. It would be in
19 this pile of pictures. Yes.
20 Q. It shows Fuse 11 blown and Fuse
21 12 closed; is that correct?
22 A. Actually I think the pictures
23 only show fuse, yeah, the pictures are only
24 of the blown fuse.
25 Q. That would be 11?

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1 A. Yeah, the rest of them are of the
2 fuse box itself and the cover.
3 Q. When the vehicle ignition is
4 turned to the off position is anything
5 serviced by Fuse 11 still energized?
6 A. Yes, Fuse 11 is powered at all
7 times.
8 Q. Okay. As well as 12?
9 A. Yes, sir.
10 Q. Okay. Any other fuses that are
11 powered at all times?
12 A. Yes.
13 Q. Which ones?
14 A. Couldn't tell you off the top of
15 my head, I would have to go back through
16 the Electrical and Vacuum Troubleshooting.
17 I would have to look at schematics. That's
18 not a complete set. I would have to go
19 back through the book itself.
20 MR. PIPES:
21 I'm going to go ahead and
22 attach as MH2 these documents that
23 you've provided me.
24 EXAMINATION BY MR. PIPES:
25 Q. At the time that you reviewed

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1 your actual photographs with Mr. Helton did
2 you also tell him that you had identified
3 this wire that you believe to be an
4 aftermarket wire and the cause of this
5 fire?
6 A. I don't recall exactly what we
7 discussed. He was concerned more about the
8 level of decomposition of the vehicle when
9 he saw it because I think he was the
10 last — of Mr. Stringer and Mr. Helton and
11 I, I think he was the last one to see it.
12 And he was concerned because there was an
13 awful lot of decomposition in the vehicle
14 and I believe in part of that conversation
15 was the area where the wire was found.
16 Q. Had he reached an opinion when
17 you talked to him as to the origin or the
18 cause of this fire?
19 A. Yes.
20 Q. When you spoke to him in West
21 Virginia he had already reached an opinion?
22 A. I'm sorry. I thought you were
23 asking me if I have reached an opinion.
24 Q. No. No. No. Had Mr. Helton at
25 the time you spoke to him in West Virginia,

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1 had he already reached an opinion as to
2 origin and/or cause?

3 A. No. I'm not really certain about
4 Larry. Again, I know that was one of the
5 reasons he wanted to see a set of
6 photographs from earlier than his
7 inspection.

8 Q. Okay. At the time that you spoke
9 to him in West Virginia was he even aware
10 of this wire that you had found during your
11 investigation?

12 A. You know, I really don't know if
13 he was or not.

14 Q. Okay. But you recall showing him
15 the wire in your photographs?

16 A. Yes.

17 Q. Okay. When you showed him that
18 wire, do you recall if he said whether that
19 was even still existing at the time that he
20 went and inspected the vehicle?

21 A. Well, again, that's why I recall
22 the gist of the conversation because he had
23 said that that whole section of the sheet
24 metal of the vehicle was no longer there
25 when he saw the vehicle.

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1 Q. Right. And he advised me of the
2 same thing during his deposition, that that
3 entire area had rusted away. And so that's
4 why I'm asking you at the time that you met
5 with him in West Virginia, he must not have
6 even been aware or at least he didn't
7 physically see the wire that you allege to
8 be the cause of this fire?

9 A. Yeah, not knowing exactly what he
10 had seen before that, I think he was a bit
11 skeptical and so he wanted to see my
12 photographs because what he saw at his
13 inspection didn't seem to go along with
14 what he had heard about the case, I am
15 assuming. I really don't know for sure.

16 Q. Well, based on the fact that he
17 told both of us at the time of this
18 inspection that that entire area of the
19 vehicle where this aftermarket wire may
20 have run through a hole was deteriorated or
21 decomposed or rusted away the first time
22 that he was aware of this wire that you
23 found back in — was it — February of 2003
24 was probably the first time that he was
25 even aware of it, correct?

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1 MR. RATHER:

2 Randy, I don't know if Mark
3 knows when.

4 MR. PIPES:

5 He spoke to him. I want to
6 know his opinion.

7 THE WITNESS:

8 My opinion on what? When he
9 knew something?

10 EXAMINATION BY MR. PIPES:

11 Q. Your opinion as to when you
12 showed him those photographs if that was
13 the first occasion that he was even aware
14 of that wire?

15 A. I don't know if that was the
16 first time he was aware of that wire.

17 Q. Okay. How many photographs did
18 you take at the inspection of the switch at
19 Mr. Stringer's office?

20 A. I believe it was about a roll's
21 worth of film, roughly 35 photographs.

22 Q. That occurred prior to your
23 inspection of the vehicle?

24 A. Yes, sir.

25 Q. When you inspected the switch

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1 without being able to inspect the vehicle
2 itself, was the switch alone — your
3 inspection of the switch alone sufficient
4 for you to render an opinion as to whether
5 or not the switch was the cause of this
6 fire?

7 A. In this particular case, there
8 was sufficient enough materials remaining
9 that if forced to, I guess I could have
10 rendered an opinion, although I do believe
11 after seeing this, I requested that we find
12 the vehicle because I wanted to see the
13 rest of the vehicle. So I'm not sure what
14 you mean by that, rendering an opinion.

15 Q. Well, rendering the origin or
16 cause of a fire to be undetermined is
17 certainly something that's done quite often
18 in fire investigation, correct?

19 A. In a fire investigation, yes.

20 Q. Okay. And I want to know if the
21 only thing you had available to you was the
22 inspection of that switch itself, if you
23 could have rendered an opinion as to the
24 origin and/or cause of the fire based
25 solely on the inspection of that switch?

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1 A. I don't think anyone should try
2 to render an opinion of a fire cause and
3 origin based on the remains of one object
4 that was in the fire.
5 Q. Okay. After your inspection of
6 the switch at Mr. Stringer's office were
7 you in a position of rendering an opinion
8 that the switch was not the cause of this
9 fire?
10 A. As I recall, what I saw at
11 Mr. Stringer's office made me very
12 suspicious that the switch was not the
13 cause of this fire, which is why I asked
14 that we go out and find the remains of the
15 vehicle, so I could look at the rest of the
16 vehicle.
17 Q. And the basis for your skepticism
18 was the lack of severity of damage to the
19 switch?
20 A. And the remains of the pieces
21 that I saw, yes.
22 Q. Anything else?
23 A. Not at that time, no. That's all
24 I saw.
25 Q. Just the lack of severity of

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1 damage?
2 A. The relative level of damage
3 compared to other, you know, other switches
4 I've seen.
5 Q. Okay. All right. Let me see the
6 photographs. And you have them turned a
7 certain way. Are those like duplicate
8 sets, is that why you have them turned?
9 A. You mean in each stack?
10 Q. Yes.
11 A. No, it's just a different section
12 of pictures, you know. This one is this
13 set and this part of the vehicle and that
14 part of the vehicle, just my way of
15 organizing so I can find things a little
16 quicker.
17 Q. I had asked at Mr. Halton's
18 deposition for a copy of those photographs.
19 So if we can get reprints as soon as
20 possible, that would be great.
21 MR. RATHER:
22 We have a disk.
23 THE WITNESS:
24 I think there's two of them.
25 EXAMINATION BY MR. PIPES:

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1 Q. Mr. Soffman, this wire that you
2 have identified as the cause of this fire,
3 where was the actual failure of the wire or
4 the origin of this fire in your opinion?
5 A. It appears that the wire short
6 circuited against the edge of a hole in the
7 sheet metal of the dash panel right
8 basically in front of the driver's foot
9 position, but in the engine compartment of
10 the side of the dash panel.
11 Q. Is this a hole that normally
12 there's no wiring passing through?
13 A. That's correct.
14 Q. Okay. In other words, in Ford's
15 normal assembly process, no original wiring
16 would have passed through that hole?
17 A. That's correct.
18 Q. Okay. Where is that hole located
19 on the bulkhead exactly?
20 A. It is approximately and this is
21 just an approximation, I would say about
22 12 inches inward from the driver's side of
23 the vehicle and about two or three inches
24 above the floor pan, the bottom of the
25 body, if you will.

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1 Q. Well, would that make it outboard
2 of the brake booster?
3 A. It is outboard of the brake
4 booster, yes.
5 Q. And would it be even with or
6 below the brake booster?
7 A. It's well below the brake
8 booster.
9 Q. How many inches below?
10 A. Again, it's just a guess,
11 probably around 16 inches or something or
12 something like that.
13 Q. If you were to draw a line from
14 the center of the brake booster downward,
15 how many inches outboard of the center of
16 the brake booster would it be?
17 A. Again, this is just an estimate
18 but I would say somewhere in the same
19 vicinity maybe, no, probably a little
20 shorter than that, maybe 12 inches outboard
21 of the centerline of the booster.
22 Q. Where is the speed control
23 deactivation switch located?
24 A. It's directly below the brake
25 booster.

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1 Q. How many inches?
 2 A. Again, I'm just guessing, maybe
 3 14 inches, 12 inches something like that.
 4 Q. Okay. It's directly below?
 5 A. Yes.
 6 Q. Okay. How many inches would
 7 separate this hole from the switch
 8 approximately?
 9 A. Again, just a guess, I would say
 10 they are probably a foot apart.
 11 Q. Twelve inches?
 12 A. Twelve, fourteen inches maybe.
 13 Q. And the wire itself is not a good
 14 fuel source, correct? Even assuming it was
 15 the ignition source, it is not a fuel load?
 16 A. It's not a huge fuel load, no.
 17 There's just a little bit of insulation of
 18 plastic on it.
 19 Q. Same thing with the switch fire,
 20 the switch may be the actual ignition
 21 source, but it's not a good fuel load in
 22 and of itself, correct?
 23 A. The switch has a little more
 24 plastic content than a piece of wire does,
 25 plus if it has failed in that way, it has

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1 brake fluid in it, there's a bit more fuel
 2 in that situation than there is in a single
 3 wire.
 4 Q. Did you attempt to do an
 5 investigation as to origin utilizing fire
 6 patterns, damage gradients, a normal fire
 7 investigation?
 8 A. Well, yes. That was the intent
 9 of going out and finding the vehicle after
 10 I had looked at the switch, I did try to do
 11 an investigation of the whole vehicle.
 12 Q. You have two, let's just limit
 13 our discussion to two potential ignition
 14 sources, the switch and then 10 to
 15 12 inches away, a wire. Is there going to
 16 be any significant differences in fire
 17 patterns, damage gradients in a fire
 18 starting because of a failed switch versus
 19 an arched wire or shorted wire?
 20 A. It can create different patterns
 21 even though the two things were relatively
 22 close together physically.
 23 Q. Did you attempt to distinguish
 24 the fire patterns or damage gradients
 25 assuming both scenarios?

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1 A. Based on what I saw in the
 2 vehicle inspection, there are some
 3 significant differences.
 4 Q. What would we throw the fire
 5 spread. If we assume that you are correct,
 6 that the fire started at a short in the
 7 wire passing through the bulkhead --
 8 A. One of the unique things about
 9 this particular vehicle is through the fire
 10 pattern the is the kind of -- I guess you
 11 could almost say widespread burning rather
 12 than there's a concentration on the
 13 driver's side like you normally get because
 14 of fluids there. But there's also kind of
 15 a path, very narrow path that goes behind
 16 the engine which would have been a possible
 17 path for an aftermarket wire to go from
 18 that hole to the battery. And that pattern
 19 seemed a little more evident in this
 20 vehicle than I had seen in other vehicles
 21 of this type.
 22 Q. Are there other wiring harnesses
 23 that also run behind the engine on the
 24 bulkhead?
 25 A. Not in this model year vehicle, I

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1 don't believe. There's a couple of
 2 take-outs that come out to different
 3 devices, but there is no main harness
 4 across there.
 5 Q. Were you able to determine the
 6 origination point and termination point of
 7 this wire?
 8 A. No. The wire was damaged in the
 9 fire. And it basically was broken off
 10 about -- I guess about eight inches into
 11 the engine compartment from the hole.
 12 Q. It actually passed through the
 13 hole?
 14 A. Yes.
 15 Q. Okay. How much of the wire was
 16 remaining on the passenger side of the
 17 hole?
 18 A. I didn't do any further
 19 investigation into the passenger
 20 compartment at that time because I was
 21 alone. I figured if anyone afterwards
 22 wanted to delve into that, we could go back
 23 and do it when all parties were available,
 24 since I knew this was involved in a
 25 lawsuit, I didn't want to do any movement.

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1 Q. Did you attempt to tell anybody
2 of your findings so that that particular
3 area of the vehicle could be preserved?
4 A. I believe we spoke, either Jim or
5 I or one of Ford's counsel and I.
6 Q. Do you know if that information
7 was ever passed on to my office or anyone
8 associated with State Farm?
9 A. What information? As far as --
10 Q. That you found a shorted wire
11 that you felt to be the cause of the fire
12 and that that should be preserved.
13 A. I don't know if that was ever
14 communicated to you or not.
15 Q. Did you do anything to attempt to
16 preserve that wire in that area of the
17 vehicle that you felt was the origin of the
18 fire and the cause of the fire?
19 A. Other than there were some pieces
20 of carpeting that had been lain across the
21 engine compartment when I got there, I put
22 them back in place to try and protect the
23 area as it had been protected when I got
24 there.
25 Q. Other than your camera, what

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1 equipment did you take with you to the
2 scene?
3 A. I had my bag that I carry my
4 equipment in. I usually have extra film
5 and a marker to mark the film. And what
6 else do I have in there? A tape measure,
7 you know, some other odds and ends tools, a
8 pad of paper, my overalls.
9 Q. What magnification do you have on
10 your camera for zoom purposes?
11 A. You know, I'm not exactly sure
12 what the magnification level is. It's a
13 50-millimeter lense, but I'm not sure what
14 the --
15 Q. Did you take any close-up shots
16 of this wire?
17 A. As close as I can get without
18 disturbing a lot of things, you know, in
19 the surrounding areas, yes.
20 Q. Did you have with you any type of
21 magnifying lense or anything of that nature
22 to look at the wire closer?
23 A. No.
24 Q. How were you able to determine
25 that that wire had shorted?

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1 A. There were a couple of half
2 circular shapes cut into the steel around
3 the perimeter of the hole that wouldn't
4 have been there normally.
5 Q. I'm sorry. What did you see?
6 A. The diameter of the hole was no
7 longer round. There were two notches that
8 I could see. Anyway from where I was,
9 there were two notches in the sheet metal,
10 in the steel itself which was an indication
11 to me that the wire may have been arcing
12 against the sheet metal and causing the
13 sheet metal to basically be destroyed, to
14 be melted.
15 Q. Do your photographs reflect those
16 two notches?
17 A. I think so, yes.
18 Q. Can you find all of the
19 photographs that you have of the hole
20 and/or the wire?
21 A. I think these four are the ones
22 that I have that specifically have the wire
23 in the hole.
24 MR. PIPES:
25 These photographs are not

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1 marked other than possibly during
2 developing. I'll identify them on the
3 back as Roll 4 Number 23A, Roll 4
4 Number 20A and Roll 4, 21A and 22A
5 Roll 4. And I would like to attach
6 just black-and-white copies to the
7 deposition.
8 EXAMINATION BY MR. PIPES:
9 Q. And before I discuss those
10 photographs, I am terrible, I interrupted
11 you. I wanted you to walk me through the
12 fire from your origin, the wire, tell me
13 how this fire started in your opinion.
14 A. Well, it appears that this wire
15 was being run out into the engine
16 compartment to make a connection to battery
17 power for some aftermarket electrical
18 addition to the vehicle.
19 Q. What gauge wire was it
20 approximately?
21 A. Again, I didn't actually get a
22 chance to measure it. I guess it could be
23 measured, I guess, if we could go out and
24 find it, it appears to be probably 16-gauge
25 wire.

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1 Q. Relatively small?
 2 A. That's just a guess. I'm looking
 3 from a distance.
 4 Q. Relatively small wire?
 5 A. I would call that an average size
 6 wire.
 7 Q. And you don't know if it was
 8 fused or not?
 9 A. No. Because about eight inches
 10 past the hole into the engine compartment
 11 is where the wire was actually parted loose
 12 from the fire.
 13 Q. You don't know if it actually ran
 14 directly to the battery or to some other
 15 spot in the engine compartment?
 16 A. Right. I never was able to pick
 17 up a trail on the rest of the wiring.
 18 Again, I was also trying not to disturb too
 19 much, but I could not find any other pieces
 20 of that wire.
 21 Q. Does Ford use any 16-gauge wire
 22 in its assembly process?
 23 A. Yes.
 24 Q. And how were you able to
 25 determine that this wasn't a normal wire

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1 other than its location, a wire originally
 2 found in this vehicle?
 3 A. We don't put single wires through
 4 holes in the dash panel, it's just not
 5 done.
 6 Q. How much was sticking out into
 7 the engine compartment?
 8 A. That one photograph there is not
 9 the best in the world, but maybe six or
 10 eight inches. Again, I'm just estimating
 11 these distances off the top of my head. We
 12 could measure them.
 13 Q. And none actually traveled into
 14 the passenger compartment?
 15 A. Well, again, I didn't excavate
 16 into the passenger compartment. That's
 17 where the other end of it went. I didn't
 18 dig into the passenger compartment.
 19 Q. Did you actually go into the
 20 passenger compartment or just run into the
 21 bulkhead?
 22 A. As can you see in the
 23 photographs, it went right through the
 24 hole. It's hanging on the edge of the hole
 25 there.

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1 Q. Was it fused to the bulkhead at
 2 all or just ran through the hole?
 3 A. I don't believe that it was
 4 actually fused to it. It was stuck down in
 5 one of those notches. So it's with all of
 6 the corrosion that occurred from the
 7 vehicle being out in the weather, it's hard
 8 to say whether it was actually ever affixed
 9 to it or not.
 10 Q. Did you find any signs of arking
 11 on the wire?
 12 A. Didn't want to disturb it, so I
 13 didn't get too close to it other than the
 14 fact that it's parted about eight inches
 15 away. There's no, you know, no
 16 observations made closely enough yet to see
 17 if the wire's damaged in any way.
 18 Q. Well, at the end that you
 19 could -- the two ends that you could find,
 20 there were signs of arking on either end?
 21 A. The two ends?
 22 Q. Uh-huh (indicating
 23 affirmatively).
 24 A. I never found two ends.
 25 Q. How can you only find one?

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1 A. The other one is buried into the
 2 interior.
 3 Q. You mean it continued to run into
 4 the interior?
 5 A. Yes.
 6 Q. And you didn't track it down?
 7 A. No, sir, not without other
 8 parties involved in this lawsuit being
 9 there, I wasn't about to start tearing down
 10 a piece of evidence by myself.
 11 Q. Did Mr. Halton?
 12 A. I don't know.
 13 Q. On the end that you could see
 14 that stuck out approximately eight inches,
 15 no signs of arking on that end?
 16 A. I didn't look for any evidence
 17 because I didn't want to damage the wire
 18 and the area around it. You would have to
 19 take that piece of wire and look at it
 20 under a microscope to see if it was arking
 21 or at least get it out of the hole. You've
 22 got to realize this is about the middle of
 23 your shin high. You're leaning in over a
 24 fender. I'm trying not to move anything.
 25 Q. I understand that, but --

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1 A. So I didn't get what I would call
2 a good enough look to see. All I saw was
3 the irregularities on the edge of the hole
4 and that was enough indication to me there
5 was more activity at that location where
6 the wire was touching the steel than other
7 parts of the perimeter of that hole.
8 Q. Well, there was no signs of
9 arking on the wire immediately adjacent to
10 the hole?
11 A. I don't know. I haven't looked
12 at the wire that closely.
13 Q. Well, you think there would have
14 been shorting on that wire capable of
15 actually damaging the bulkhead without
16 damaging the wire?
17 A. I don't know if the wire's
18 damaged because I can't get close enough to
19 it. On that particular day I couldn't get
20 close enough to it to look at that. With
21 the corrosion that's occurred because of
22 the vehicle being stored outside, outdoors
23 for three years after the fire, I don't
24 know what's been corroded away by exposure
25 to the elements. It's not something I want

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1 let's assume that my pen is a 16-gauge
2 copper wire. Was is it stranded or solid?
3 A. It's stranded.
4 Q. Okay. Let's assume that my hand
5 here, I'm doing the "okay" sign, is the
6 hole in the bulkhead. Is it your opinion
7 that a 16-gauge wire carrying between 12.6
8 and 13.4 volts can touch the side of this
9 steel bulkhead and cause physical damage to
10 the bulkhead without separating the copper
11 wire?
12 A. The physical damage to the
13 bulkhead is caused by rust and corrosion
14 from having been left outdoors. The wire
15 was stuck to it when I got there, but I
16 couldn't tell if it was melted to it or
17 not. And I could not tell you for a fact
18 that when the wire initially touched the
19 sheet metal whether it actually melted any
20 of the wire, that's not typical, or melted
21 any of the sheet metal, that's not typical.
22 But it may have gotten hot enough and
23 stressed it badly enough during the arking
24 event when you add the aging and corrosion
25 due to being left out in the environment,

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1 to jump to a conclusion at, but I did note
2 irregularities to the hole which was much
3 more telling to me because copper usually
4 melts long before steel does.
5 Q. Mr. Hoffman, you're not a
6 metallurgist, correct?
7 A. I'm not a degreed metallurgist,
8 no.
9 Q. Okay. The maximum voltage on
10 that wire assuming no additional source
11 would have been 12 volts from the battery,
12 correct?
13 A. Somewhere between 12.6 and 13.4,
14 yes.
15 Q. Okay. And in your opinion a
16 16-gauge wire can short to a -- that's a
17 steel bulkhead, correct?
18 A. Yes.
19 Q. A steel bulkhead and actually
20 cause physical damage to the bulkhead
21 without separating a copper wire?
22 A. That is a rusted piece of steel
23 and I don't know exactly what happened
24 during the actual event.
25 Q. Okay. But back to my question,

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1 that piece of the hole edge would have been
2 weaker from having been annealed by the
3 electrical ark, it may not have melted the
4 wire, it may not have melted the steel. It
5 may have annealed the steel and burned away
6 enough of the -- I think the fire
7 eventually burned away all of the paint.
8 Even then I'm not certain, all I'm saying,
9 there were irregularities at the end of
10 that hole that indicate that there may have
11 been a short circuit event going on between
12 that wire and the edge of that hole.
13 Q. There were irregularities in that
14 hole also that showed deterioration from
15 oxidation and weathering, correct?
16 A. The whole piece of sheet metal
17 showed the effect of aging.
18 Q. But that hole did as well, did it
19 not?
20 A. Yes.
21 Q. Okay. And you didn't really get
22 a good look at this hole from the position
23 that you had out there at the scene, did
24 you not?
25 A. Other than what's depicted in

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1 those photographs.

2 Q. And you're not a metallurgist and
3 you didn't have any type of magnification
4 possibilities out there. Can you tell me
5 how you were able to discern that the
6 damage to that hole was some type of
7 electrical event versus just normal
8 degradation from oxidation in the
9 environment?

10 A. Well, when the shape of that mark
11 on the edge of the hole, for loss of a
12 better word, is the same shape as a piece
13 of wire that is parted six or eight inches
14 away, it makes me very suspicious that
15 something happened between that wire and
16 that notch in the steel where I found that
17 wire that caused that notch to occur. It's
18 not just magic that that notch should
19 occur. Corrosion doesn't happen that point
20 specific in space.

21 Q. I'm looking at all four of your
22 photographs. In all four of your
23 photographs, the wire passes through the
24 opening without a break. And it is not
25 touching the sides. Did you have — you

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1 said when you got there, it was still
2 touching one of the sides. In this
3 photograph, it's not touching the side.

4 A. Yes, it is. It's touching in
5 both of these pictures.

6 Q. I disagree with you. In any
7 event --

8 A. This one, it started to fall
9 away. You can disagree all you want.

10 Q. In that photograph, would you
11 agree with me it's not touching and that's
12 Photograph 20A?

13 A. It is hard to say, but it doesn't
14 look like it's touching in this picture.

15 Q. All right. Now, I'm showing you
16 photograph — I'm sorry, which one is that?

17 A. Twenty-three.

18 Q. It's 23A. Do you think that it
19 is touching in that photograph?

20 A. Yeah, the reason I moved from
21 this angle to that angle is to show the
22 relationship of that notch in the edge of
23 the hole to where the wire is.

24 Q. Okay.

25 A. So that's why I took these these

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1 two pictures from two different angles.

2 Q. My question is: Is it your
3 opinion in Photograph 23A, the wire's
4 touching the side of that hole?

5 A. That there's physical contact
6 now?

7 Q. Yes.

8 A. No. I'm sorry, I misunderstood
9 you. I thought you said that wire had
10 touched that hole. It was touching the
11 hole at one point when I looked at it.

12 Q. Show me the photograph that you
13 have where it clearly is touching the hole.

14 A. I may have moved the wire in
15 attempting to try and get one of these
16 photographs, but the touching of the hole
17 is indicated by the notch in the side of
18 the hole.

19 Q. Okay.

20 A. Okay.

21 Q. You may not have a photograph of
22 the wire actually touching the side of the
23 hole then; is that correct?

24 A. That may be true.

25 Q. Let me have that one back,

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1 please.

2 A. That's just one of the wires ---
3 itself.

4 Q. Okay. So we may not have a
5 photograph that even shows the wire
6 touching the hole, correct?

7 A. I don't believe that we have one
8 physically touching.

9 Q. Looking at the sequence of those
10 photographs, how might you have touched
11 that wire in a way that made it not touch
12 the hole?

13 A. The wire's dangling out the hole,
14 hanging in mid air. So attempts to try and
15 move around the vehicle and take
16 photographs of my inspection, I may have
17 had occasion to contact that end of that
18 piece of wire and it came loose.

19 Q. And it was not welded or attached
20 to the bulkhead?

21 A. I seem to have a recollection of
22 it contacting. Now, I may not have made
23 that evident in a photograph, but I do
24 recall that it was contacting the sheet
25 metal. But it could have been pushed over

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1 there sometime between the fire and when I
2 saw it too. Whether it's touching or not,
3 it's not hugely compelling.
4 Q. Was it melted to the bulkhead?
5 Did it show signs of being --
6 A. I don't recall it being, you
7 know, physically affixed, again, unless you
8 look at the two pieces under a microscope
9 and get some idea of what might have
10 occurred, it's hard to say whether they
11 ever adhered to one another.
12 Q. So you think that it's possible
13 in your opinion that this 16-gauge wire
14 carrying between 12.6 and 13.4 volts had
15 some type of arc or short to this bulkhead
16 without in any way melting or arking,
17 actually physically attaching to the
18 bulkhead or damaging the wire or separating
19 the wire?
20 A. I don't know that any of what you
21 just said is true until you take all of
22 that steel and that piece of wire out of
23 there and look at them under a microscope
24 and possibly do some chemical analysis,
25 it's hard to say what may have happened at

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1 the point when the fire started.
2 Q. Well, you walked --
3 A. And how do you separate what
4 happened during the fire, during the
5 corrosion or separating what happened at
6 the fire from the corrosion effects?
7 Q. If that wire was energized prior
8 to the fire and the fire started somewhere
9 else, then that wire may short or arc as a
10 victim of firespread actually getting to
11 that wire rather than a cause of fire,
12 correct?
13 A. Possibly.
14 Q. How can you distinguish that,
15 even assuming that we do find arking on
16 this wire?
17 A. Because of the notch in the
18 steel, that notch in the steel is not
19 natural.
20 Q. Okay. My question is: A fire
21 starts somewhere else, compromises the
22 insulation on this wire where it passes
23 through the bulkhead and actually arcs
24 against that bulkhead, how are you going to
25 look at this vehicle now or your

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1 photographs and determine if the wire was
2 the cause of the fire versus a victim of
3 the fire?
4 A. The fire patterns on the vehicle
5 point more toward where that wire is than
6 any other thing on this vehicle. That's
7 the only thing in that area that could have
8 been the origin of the fire or the ignition
9 source of the fire.
10 Q. You didn't pull this wire in or
11 out prior to photographing it, did you?
12 A. I don't believe so. Again,
13 taking my photographs and not knowing that
14 that was there at the time, there's a
15 possibility I might have moved it. But I
16 do recall seeing it touching when I first
17 looked at it.
18 Q. Without seeing any signs of
19 arking, without tracing the wire to where
20 it went, without doing any of that, how did
21 you walk away from this inspection and
22 identify that wire as the cause of this
23 fire?
24 A. Because that's where the burn
25 patterns pointed. That side of the dash

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1 panel was totally destroyed and the base of
2 the area, the most damage was that wire
3 with a notch in the steel next to it, that
4 seemed pretty clear to me.
5 Q. Without any signs of damage to
6 the wire itself that appeared clear to you?
7 A. The wire's gone. What do you
8 mean no damage?
9 Q. Well, I'm looking at a photograph
10 of the wire.
11 A. The rest of the piece of wire is
12 gone.
13 Q. You mean after it extends
14 eight inches into the engine compartment,
15 it's gone?
16 A. It's gone.
17 Q. So you don't think the fire
18 started at the bulkhead, you think it
19 started on the wire somewhere within the
20 engine compartment?
21 A. The wire itself will heat up its
22 entire length, it will begin to heat up
23 objects around it and they will ignite at
24 different times. And any plastic component
25 that that was up against, it would burn

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1 that plastic component until the copper got
2 hot enough to melt itself.

3 Q. Do you think the fire started at
4 that hole where that wire ran through the
5 bulkhead?

6 A. I think it started near there.

7 Q. Where? Like what is your area of
8 origin?

9 A. The area of origin is the dash
10 panel, the lower portion of the dash panel
11 on the driver's side of the engine
12 compartment. That's where the lowest and
13 most severe point of burn is.

14 Q. And the switch is located within
15 that area of origin as well, is it not?

16 A. Well, the switch is slightly more
17 inboard than that. This point of origin is
18 markedly farther outboard than the switch
19 which is mounted on the frame rail, which
20 is over next to the origin. This is over
21 toward the wheel well.

22 Q. Well, they are 10 to 12 inches
23 apart. So you're able to actually identify
24 a specific area of origin that would
25 eliminate something 10 inches or 12 inches

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1 away, that's how specific you can get with
2 your fire investigation in this case?

3 A. With that remains in this
4 component 10 or 12 inches away, it's still
5 pretty much in intact with the small bit of
6 fire damage to it. Yes, I can make that
7 differentiation in this case.

8 Q. What are the fuel loads in this
9 area of origin?

10 A. It's hard to say because I don't
11 know where the wire was routed. It's not a
12 production wire. Say the wire is routed up
13 and wrapped around the harness that goes
14 into the bulkhead right above there, all of
15 a sudden you had all of the insulation and
16 plastic from that wire harness, if it was
17 routed across the power steering reservoir,
18 which is slightly forward or the brake
19 reservoir, which is slightly above, it's
20 hard to say because we really don't know
21 where the wire went, we know that the wire
22 is burned off though right above the area
23 so the wire was evidently very hot.

24 Q. I'm looking at the ends of the
25 wire in Photograph 21A and it doesn't

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1 appear that that is an arking type of break
2 in that wire. Is that a mechanical break?

3 A. This one frayed or this one
4 stranded?

5 Q. Yeah.

6 A. I don't know exactly. The end of
7 it isn't very clear in that photograph. I
8 was trying to photograph the hole at the
9 time.

10 Q. You were right there. If you had
11 seen signs of arking on that wire, you
12 would have photographed it, would you have
13 not?

14 A. It was awfully frayed, so I
15 didn't spend too much time taking pictures
16 of the end of the wire because it was
17 pretty damaged from the having been moved
18 around, I thought. I was afraid it might
19 have been from being moved around, but
20 these individual strands were snapped off.

21 Q. Okay. No arking?

22 A. It could have been, I don't know.

23 Q. You don't have a clear photograph
24 of that, the end of this wire?

25 A. No. Because it was so frayed it

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1 looked like it had been mechanically
2 damaged.

3 Q. Okay. Mechanically damaged, not
4 electrically?

5 A. From being moved, from the
6 vehicle being moved around. See, I didn't
7 want to -- I didn't feel that there was
8 anything there to take a picture of.

9 Q. All right. At least what's there
10 didn't show any signs of electrical
11 activity.

12 A. Well, what was there was so badly
13 damaged, you couldn't tell.

14 Q. Where this wire passed through
15 the bulkhead, if in fact it traveled toward
16 the battery, it would have gone inboard,
17 not outboard, correct?

18 A. I don't know that, to be honest
19 with you.

20 Q. So you don't know where the wire
21 traveled?

22 A. Not for certain. There's only
23 eight inches of it left, so it's hard to --
24 it was dangling straight out of the hole
25 because it had been broken.

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1 Q. I thought you said earlier one of
2 the reasons you thought it was this wire
3 was because you saw an unusual fire spread
4 across the back of the engine where this
5 wire would have traveled?

6 A. Yes.

7 Q. But no other wiring harness of
8 Ford's travels?

9 A. Where it could have traveled,
10 yes. But it's speculation on my part to
11 say that based on just the fire patterns.
12 But my speculation would be it ran up and
13 over the top of the brake master cylinder
14 and across the back of the engine against
15 the dash panel. That's just speculation,
16 there's no --

17 Q. If your area of origin is within
18 eight or ten inches of this hole; is that
19 correct?

20 A. Yes.

21 Q. If it was within eight to ten
22 inches of this hole and we're looking at
23 eight to ten inches of copper wire without
24 any arking on it, what is your ignition
25 source?

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1 A. The electrical activity on that
2 wire is the ignition source. The wire will
3 become hot and it will start to ignite
4 materials around it.

5 Q. So what do you think? You think
6 it ignited the insulation?

7 A. Most likely, depending on what
8 grade of wire it is.

9 Q. Walk me through. Walk me through
10 the start of this fire until
11 extinguishment. What happened?

12 A. It's hard to get super specific
13 about it when you look at damage patterns
14 on the vehicle, the burn pattern and the
15 damage pattern around that hole, it appears
16 that the wire began to short circuit
17 against the sheet metal and it may vary
18 well have been resistive in nature, which
19 is why you don't see the catastrophic
20 destruction of the copper wire and nothing
21 else. And because you've got insulation
22 that's rubbing against it, there's a seal
23 in that hole that this was probably pushed
24 against or pushed through. So there's a
25 lot of nonconductive materials that could

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1 be rubbing between the sheet metal and the
2 wire, the copper wire itself. You now have
3 a resistance in there and that resistance
4 will start to draw current away from that
5 wire. The wire appears to have not been
6 fused anywhere because I couldn't find any
7 evidence of a fuse, although that's not
8 necessarily conclusive. It does mean there
9 is a lot of electrical current available to
10 feed to that resistance.

11 Q. Let me stop you. You didn't find
12 any signs of that wire being fused. You
13 didn't trace the wire, did you?

14 A. I tried to guess where it may
15 have been connected. And I looked at the
16 alternator and the battery, which was two
17 typical places where we find aftermarket
18 wiring being added on and I didn't find any
19 evidence of any added on wires. But I also
20 didn't excavate the interior of the
21 vehicle. It may have been hooked somewhere
22 in the interior. I don't know.

23 Q. It may have been fused to the
24 fuse panel in the vehicle, correct?

25 A. It could have been, yes.

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1 Q. It may have had an inline fuse
2 between the product that it was servicing
3 and the bulkhead?

4 A. It could have.

5 Q. Could have been an inline fuse
6 from where we see it terminate to wherever
7 it ran to the battery?

8 A. Yes.

9 Q. Okay. Is there also a fuse box
10 in the engine compartment?

11 A. Yes.

12 Q. Okay. It could have utilized
13 that fuse box?

14 A. Possibly.

15 Q. So you can't say either way?

16 A. No.

17 Q. So you have no idea if that wire
18 was or was not fused?

19 A. That's correct.

20 Q. Okay. And I interrupted you.
21 This wire somehow compromises the
22 insulation on the wire and the rubber seal
23 on the bulkhead, correct?

24 A. No. No. The hole in the
25 bulkhead would have a rubber seal in it in

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1 normal production. To get a wire in there,
2 someone would have had to have moved the
3 seal aside and fed the wire in between the
4 seal and the sheet metal hole and then let
5 the seal snap back into place, basically,
6 so it will hold wire and it would also be
7 doing its job of sealing the hole.

8 Q. Unless they just punctured a hole
9 in the seal and passed the wire through.

10 A. You could conceivably puncture
11 that. Either one of those cases with the
12 vibration of body and whatever this wire
13 was connected to overtime, this vibration
14 would cause the wire to either cut through
15 the rubber seal or if it had been put
16 through the edge of the seal it could have
17 cut through the insulation on the wire.

18 Q. Or both?

19 A. Eventually it has to get both.

20 Q. Then there's direct contact
21 between the wire and the bulkhead?

22 A. I'm not sure that you could say
23 direct, does not appear like that was a
24 direct short because the wire isn't
25 destroyed at the point of short circuit.

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1 Q. Okay.

2 A. As you were kind of alluding to
3 before, copper melts before steel. The
4 damage that I observed, and again, I'm
5 trying to equate this with some known
6 corrosion of having been stored, you know,
7 for a couple of years outdoors, but from
8 what I observed it appears like there was a
9 resistive short circuit that was in
10 existence for some period of time. It may
11 have been intermittent. It may have been
12 bouncing back and forth overtime. It had
13 wire insulation. It had a seal. It had
14 the — in fact it was probably, you know,
15 just making intermittent contact, all sort
16 of added together into a rather complex
17 situation where it's making a lot of heat
18 possibly without actually being in contact
19 long enough to melt the metals because the
20 heat's being dissipated away by the metals.

21 Q. So the wire overheats?

22 A. The wire —

23 Q. This resistive heating right
24 there at the opening, what is ignited, the
25 the insulation on the wire?

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1 A. It's hard to say what gets
2 ignited first. Fires tend to be pretty
3 chaotic. But the insulation on the wire is
4 going to start to melt. Anything that that
5 wire is contacting, that piece of copper
6 will be hot and the heat will begin to
7 extend up the copper wire because copper is
8 a very good conductor of heat and, again,
9 at that point just like trying to find the
10 fuse and being unsuccessful, speculating on
11 the route of that wire is somewhat
12 speculative. I'm looking at the dash panel
13 on the vehicle and thinking it was routed
14 up over the top of the brake master
15 cylinder where the brake fluid reservoir is
16 and somehow started to heat up the brake
17 reservoir and got brake fluid involved,
18 which really got the fire started.

19 Q. I thought the area of origin was
20 within an eight-to-ten-inch area around
21 that hole. That's not where the fire
22 originated?

23 A. The area of origin, I believe at
24 the very beginning I said it was on the
25 driver's side of the engine compartment in

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1 the back near the dash panel.

2 Q. Okay. And the eight-to-ten-inch
3 area that excludes the switch?

4 A. Well, an eight-to-ten-inch-wide
5 area that we were talking about in that
6 photograph, somewhere in that area, yes.

7 Q. Okay. What was —

8 A. That's why the term area is used,
9 not point.

10 Q. You just mentioned something, it
11 may have ignited the reservoir.

12 A. I was speculating. You asked me
13 to speculate how the fire progressed.

14 Q. Is that within the
15 eight-or-ten-inch area?

16 A. It would be once the fluid dumps
17 out of it. I'm not sure what you're
18 asking.

19 Q. I want you to walk me through the
20 fire based on your investigation and tell
21 me what you can and can't determine. Did
22 the fire originate because the wire got hot
23 because of resistive heating here but it
24 may have started four feet away or did the
25 fire actually start here at the bulkhead

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1 and propagate upward and outward from that
2 area?

3 A. It is not as simple as to say
4 this very spot right here is where the fire
5 started. That is an ignition source, that
6 wire against that piece of sheet metal is
7 an ignition source that is within an area
8 of origin. The area of origin is the one
9 that has the lowest and highest levels of
10 burn.

11 Q. Okay.

12 A. You asked me to then describe all
13 of the individual steps in between. Okay.
14 That is pure speculation, which I said
15 right at the beginning of that discussion
16 it is speculation. Okay. The point of the
17 area of the origin is on the driver's side
18 of the engine compartment near the dash
19 panel and in that area is that wire up
20 against that piece of sheet metal as a
21 source of ignition.

22 Q. What fuel load do you have in
23 that area of origin other than the
24 insulation on this aftermarket wire?

25 A. There is insulation and there are

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1 other wires and shields on wire harnesses
2 that are close by. There is a plastic
3 inner fender. There is, as I was trying to
4 describe in the one scenario that I was
5 speculating on, there is a brake fluid
6 reservoir that is above and slightly
7 inboard from that point. There are quite a
8 few.

9 Q. All of those are more than eight
10 to ten inches from that hole, are they not?

11 A. The fire moved more than eight to
12 ten inches from the hole as can you see
13 from the damage of the Sims' home.

14 Q. I realize that. But we seem to
15 be backing up because generally fire
16 investigation involves looking at fire
17 patterns and burn damage gradients and
18 determining the area of origin. Within
19 that area of origin, source of ignition.
20 We seem to be yo-yoing back and forth.
21 You have an area of origin within eight to
22 ten inches of a hole, then you start
23 pointing out reservoirs and wheel fenders
24 and things like that that are outside of
25 your area of origin.

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1 A. No, that is not true. That is a
2 misrepresentation of what I said.

3 Q. Correct me.

4 A. Okay.

5 Q. Okay.

6 A. I told you the area of origin is
7 the driver's side of the engine compartment
8 in the rear area near the dash panel. You
9 were talking about eight or ten inches away
10 in reference to the switch and the hole and
11 then you asked me what the point of -- what
12 the ignition source is. I'm sorry. I may
13 have misunderstood you. I was talking
14 about the ignition source being the wire in
15 the hole. That doesn't mean that the fire
16 has to start within eight to ten inches of
17 that hole. The area of origin is the area
18 around the dash panel of the vehicle on the
19 driver's side of the engine compartment.
20 It will always be that area of origin.

21 Q. The fire patterns indicate the
22 first fuel load was possibly the reservoir
23 or the fuel or -- the wheel fender, the
24 wheel well fender?

25 A. The inner fender is plastic. The

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1 reservoir is plastic and has flammable
2 fluid inside of it. There is a very large
3 wire harness that comes out of the dash
4 panel from the engine control module that's
5 directly above of that hole. It has a huge
6 number of wires, connectors, taps, shields.

7 Q. You're saying fuel loads. The
8 fender, wire harness, the shields or the
9 reservoir, all of those may have been the
10 first fuel load ignited by this wire?

11 A. No. Those, you would have fuel
12 load, those are the things that add fuel
13 load to the fire which causes the damage
14 pattern that you see on the dash panel of
15 the vehicle.

16 Q. If those are the things that
17 cause the fire patterns, how are you able
18 to say that the source of ignition is down
19 by this hole within a 10-inch area rather
20 than up at the reservoir, over at the wheel
21 fender?

22 A. I'm sorry. What did you call it?
23 Did you call it a point of origin?

24 Q. Yes.

25 A. There is an area of origin.

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1 Q. Yes.
2 A. Not a point of origin, there is
3 an ignition source inside that area of
4 origin.
5 Q. Eight to ten inches you've said
6 from that hole, that's your area of origin?
7 A. The area of origin, no, I never
8 said that the area of origin was within
9 eight to ten inches of the hole. I said
10 the wire in the hole is the ignition
11 source, that the area of origin, I think
12 when we first started this whole
13 conversation about these photographs, was
14 that it is on the driver's side of the
15 engine compartment, rearward in the engine
16 compartment at the dash panel.
17 Q. You have said in fact that at
18 least 20 times in this deposition in
19 response to my questions that the area of
20 origin is eight to ten inches from this
21 hole in the bulkhead. Now, did you
22 mispeak? Did you not understand those
23 questions?
24 A. I don't think that — I don't
25 think that I answered any of your questions

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1 in that specific way.
2 Q. Okay. Let's start over. You
3 originally said that you thought the fire
4 started from a short at the bulkhead where
5 this hole is. I then pointed out to you
6 that about 10 inches away —
7 A. No. The wire shorting against
8 the sheet metal is an ignition source.
9 Q. The heat source. Okay.
10 A. It is the ignition source.
11 Q. The ignition source. Where did
12 the fire originate? What was the first
13 thing ignited?
14 A. There are two separate questions.
15 Q. Okay. Where did the fire begin?
16 First of all, do you have a point of
17 origin? Do you have an exact point of
18 origin?
19 A. I have an area of origin.
20 Q. You don't have a point of origin?
21 A. No.
22 Q. Where is your area of origin?
23 Tell me how big it is and exactly where it
24 is.
25 A. It is on the driver's side of the

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1 engine compartment in the rearward portion
2 of the engine compartment against the dash
3 panel.
4 Q. Okay. Would the hole in the
5 bulkhead be at the center of your suspected
6 area of origin?
7 A. At the center, it is roughly at
8 the center widthwise and at the bottom
9 heightwise.
10 Q. And the switch is not within your
11 area of origin; is that correct?
12 A. It is slightly closer to the
13 centerline of the vehicle than this area
14 I'm talking about.
15 Q. So the answer's no, the switch is
16 not within my area of origin?
17 A. The switch is not within the area
18 of origin.
19 Q. So you are able to identify an
20 area of origin approximately 10 inches in
21 radius from that hole?
22 A. Well, say 10 inches either side
23 of the hole and the area of most damage up
24 at the dash panel goes about two feet, I
25 guess. Again, I'm guessing at dimensions.

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1 I didn't measure any of this, but the
2 entire dash panel on the driver's side of
3 the engine compartment between the brake
4 booster and the fender was totally
5 destroyed. The steel was exposed to so
6 much heat during the fire, it was rusted
7 all the way through by the time I saw it
8 two years later. So that was the most
9 intense part of the fire over there.
10 Q. You were able to determine your
11 area of origin from fire patterns and burn
12 damage gradients caused by fuel loads
13 within the area of origin, correct?
14 A. In part.
15 Q. Okay. And that would not involve
16 the small 16-gauge wire, the 16-gauge wire
17 that you think was the ignition source,
18 certainly didn't cause these patterns in
19 and of itself, the fuel load of this
20 particular wire is negligible, correct?
21 A. Nothing does anything by itself
22 in a fire. These are very chaotic and
23 complex occurrences.
24 Q. But the wire, the heat from the
25 wire under your scenario had to ignite some

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1 bigger, larger fuel loads to cause a fire
2 pattern that you could come back in April,
3 I'm sorry, February of 2003 and discern and
4 track back and identify as an area of
5 origin?

6 A. The area of origin is pretty
7 clear based on the damage, the burn damage
8 in that area.

9 Q. Okay. And I want to know what
10 the fuel loads are within your area of
11 origin. What are the fuel loads within
12 your area of origin? Not where it
13 propagated later.

14 A. They're the same as the ones I
15 mentioned earlier. There are wire
16 harnesses. There are connectors and
17 bulkhead connectors for the wire harness
18 and grounders. There's the inner fender,
19 which is plastic. There is the brake
20 lines, the fuel lines. Again, this is
21 getting a little bit farther toward the
22 perimeter, but all the materials around
23 that area are predominantly made of
24 plastic. All of those things are gone in
25 the fire, they have been consumed in this

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1 fire, therefore, they were part of the fuel
2 load.

3 Q. Those are the things that caused
4 a majority of the patterns and damage,
5 those larger fuel loads that put off more
6 heat for longer periods of time.

7 A. As far as the fuel loads that are
8 in the engine compartment in that area,
9 yes.

10 Q. In a true switch fire, those that
11 you have found to have been caused by
12 switches, those exact same fuel loads are
13 consumed in the fire, correct?

14 A. The fuel load is consumed pretty
15 much the same.

16 Q. The same wiring harness?

17 A. The same parts and the same
18 materials --

19 Q. They are all burned?

20 A. -- are pretty much consumed --

21 Q. Okay.

22 A. -- in most of these fires, yes.

23 Q. How are you able to determine
24 that this fire was caused by something 12
25 inches away from the switch and not the

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1 switch itself?

2 A. Well, there's several things that
3 have survived. We've been talking about
4 fuel load. But the switch housing itself
5 survived the fire, which I wasn't aware of
6 until last week when we got a copy of
7 Mr. Springer's photographs when he
8 inspected the vehicle. The switch was
9 actually still intact, which I didn't know.
10 When I saw it, it was actually in two
11 pieces. But that's a piece of plastic that
12 was not consumed. There's another piece
13 of --

14 Q. What do you mean by consumed?

15 A. Typically the plastic of the
16 switch housing will be consumed in the
17 fire.

18 Q. It was severely damaged. You say
19 it wasn't burned to completion?

20 A. Yeah, it was fire damaged. It
21 was not consumed in this area. There is a
22 grommet in the brake booster which
23 typically is consumed when the fire is
24 right underneath the brake booster and that
25 grommet was still there even three years

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1 later or two years later when I saw it.
2 The grommet to the steering shaft, it's
3 still present. It's only a few inches away
4 from the switch. Also through a hole in
5 the dash panel, the damage is markedly
6 different and it isn't a great distance,
7 but the switch is here and if the fire
8 starts here at the switch and burns upward
9 and outward, you tend to see more consumed
10 fuels in here, in this "V", if you will,
11 than in this particular case where the "V"
12 is over here, pointing at this wire through
13 this hole.

14 Q. In a switch fire, walk me through
15 one of those. The switch starts to burn,
16 correct, like a candle, I believe the
17 mechanic in Tennessee said?

18 A. In one particular case where they
19 actually saw the part, yes.

20 Q. Burns about like a candle,
21 correct?

22 A. That's what he saw, yeah.

23 Q. Do you have any reason to believe
24 in a switch fire that it burns in any other
25 manner?

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1 A. The possibilities are limitless
2 as to how it could progress from that
3 point.
4 Q. But we've had an eyewitness to a
5 switch fire that described the burning
6 switch as like a candle flame. I want to
7 know if you have any reason to believe that
8 it would be otherwise. If you do, tell me
9 what it is. Have you run tests and started
10 a switch fire where it didn't burn like a
11 candle? I mean, if it went off like a
12 Roman candle, I want you to tell me that's
13 a possibility. And if so, why do you
14 believe that to be a possibility?
15 A. I guess I'm not sure exactly what
16 you want to know.
17 Q. All right. I am now trying to
18 distinguish between the fire patterns in
19 your scenario versus a normal switch fire
20 or a switch fire. And an eyewitness to a
21 switch fire has described the flame from
22 the switch as that flame of a candle. And
23 I want to know if you feel that that flame
24 can be different than that of a candle and
25 if so, why?

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1 had a mechanic in a dealership say it was
2 burning right there at the top of the
3 switch like a candle. If you know that
4 that is not the only way that one burns
5 after a failure, then please tell me. If
6 you have no idea how a switch fails and
7 starts a fire or what it looks like or how
8 it burns, then you can tell me that too. I
9 want to know what you know.
10 A. That observation made by that
11 mechanic is the only data that I know of
12 that exists on how these switches will
13 burn.
14 Q. Okay. The brake fluid leaks into
15 the electrical portion, correct?
16 A. Yes.
17 Q. Is the brake fluid under
18 pressure?
19 A. It is in the brake lines.
20 Q. Okay. And that pressure actually
21 forces the brake fluid past the disk and
22 into the electrical portion of the switch,
23 correct?
24 A. I would assume so.
25 Q. At some point?

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1 A. Again, depending on the scenario,
2 I mean you're asking me to invent a story
3 based on that one incident and my level of
4 knowledge of science and engineering and I
5 am not sure what you want me to --
6 Q. You work at Ford. Ford has
7 investigated hundreds and hundreds of these
8 fires. They have collaborated with Texas
9 Instruments to run a multitude of tests and
10 do an incredible amount of research. And I
11 want to know if you know how one burns when
12 you have the actual failed switch.
13 Describe the fire.
14 A. Again, I can describe all kinds
15 of different scenarios. You haven't given
16 me enough information to be able to
17 describe anything, okay, beyond that point
18 when you're looking at fire damage, all you
19 can do is use the science that's available
20 and the rest of it is somewhat speculative
21 in nature because the fire tends to damage
22 so many things.
23 Q. These switches cause fires. What
24 I want to know is if you know how they burn
25 initially, how they start a fire. We've

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1 A. I'm not certain of that being
2 true.
3 Q. Okay. Do you know if, when a
4 switch begins to burn, if it damages the
5 disk?
6 A. When you say the disk, are you
7 talking about the actuator inside the disk.
8 Q. Yes. The disk that separates the
9 hydraulic side from the electrical side.
10 A. The seals.
11 Q. The seal, the actual round piece
12 that is pushed like a contact lens going
13 one way or the other to actuate the actual
14 switch?
15 A. The actuator is what that's
16 called.
17 Q. Okay. No, not I'm not talking
18 about that. I'm talking about the round
19 seal that separates the hydraulic side from
20 the electrical side that is the part that
21 fails and allows the brake fluid to leak,
22 correct?
23 A. I don't know of any round seal.
24 Q. It's not round. What shape is
25 it?

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1 A. Well, what part are we talking
2 about?
3 Q. In the switch, is there not a
4 substance, a part that is crimped and it
5 separates the hydraulic side from the
6 electrical side?
7 A. There are three of them.
8 Q. What are they called?
9 A. They are seals.
10 Q. Okay. Are they coated with some
11 material manufactured by Dupont?
12 A. They are coated with teflon.
13 Q. Manufactured by Dupont?
14 A. I think the whole piece of
15 material is manufactured by Dupont, yes.
16 Q. Okay. Do you know, for example,
17 if the seal is compromised during the
18 switch fire?
19 A. Is compromised?
20 Q. Consumed, burned, damaged?
21 A. It can be.
22 Q. What happens when the seal is
23 damaged? Does it release high pressure
24 brake fluid?
25 A. No.

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1 probably the most typical.
2 Q. Why do you have an opinion it can
3 occur in a million ways?
4 A. Because you're not talking about
5 the flame coming out of the switch. You've
6 been asking the question based on how did
7 it propagate.
8 Q. No, I haven't.
9 A. You've been alluding to that.
10 Q. I've been asking you to describe
11 if it's going to occur other than it's
12 described by the mechanic, how it's going
13 to happen.
14 A. Why were you mentioning brake
15 pressure and brake fluid, all of the other
16 different scenarios? I still don't quite
17 understand what you're trying to get at,
18 what you're asking me.
19 Q. All right. Let's back up. The
20 brake switch operates off brake pressure,
21 correct, hydraulic pressure? It uses brake
22 fluid and it's a hydraulic switch, correct,
23 on one side? And the hydraulic fluid, the
24 increase in pressure from utilization of
25 the brake pushes hydraulic fluid to the

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1 Q. Does it dribble out? I want to
2 know in all of these investigations you've
3 had have you ever either tried to set up a
4 test to say, look, let's burn this switch,
5 I want to see if brake fluid goes spewing
6 out of this switch because it's under
7 pressure on the hydraulic side or if it
8 just drops out or if it rolls out. How
9 does the switch fire occur, do you know?
10 Or the only data you know is what was
11 described by the mechanic in Tennessee?
12 A. The switch fire can occur in a
13 multitude of different ways, as I said to
14 begin with. It depends on the scenario.
15 Q. Okay. Tell me the multitude.
16 Tell me how they occur.
17 A. It could be any of a million
18 different ways. It would be ridiculous to
19 sit here -- you could speculate on
20 anything.
21 Q. You don't think there's a general
22 way in which these switches burn?
23 A. I think that what the mechanic in
24 Tennessee saw, which is what helped the
25 recall team pinpoint what to go for is

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1 switch and makes the seal push in against
2 the actuator, correct?
3 A. Yes.
4 Q. Okay. There is a certain amount
5 of brake fluid on the hydraulic side of
6 that switch, correct? It is a pressurized
7 system?
8 A. There's always brake fluid on the
9 other -- on the brake line side of the
10 switch.
11 Q. Exactly. My question is: When
12 the electrical side causes a fire and
13 burns, I wanted to know if you knew if the
14 seal was compromised to see what would
15 happen with the brake fluid, does it spray
16 out? Does it flow out? Does it dribble
17 out? Does it not come out at all?
18 A. Brake fluid can't move unless
19 there is pressure behind it. The only
20 place the pressure comes from is from your
21 foot on the brake pedal. Unless you're
22 sitting in the vehicle pressing on the
23 brake pedal, there shouldn't be much
24 pressure behind it.
25 Q. All right. Then that eliminates

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1 the spray or blow torch or anything like
2 that scenario, right, the brake fluid is
3 not going to have any reason to come out of
4 the switch during the fire?

5 A. During the fire.

6 Q. Initially?

7 A. Unless there's someone sitting
8 there's pushing on the pedal.

9 Q. Okay. Thank you.

10 Now, my question is: Do you have
11 any reason to believe that a fire in a
12 switch would appear or burn in any manner
13 other than as described by the mechanic,
14 that being like a candle?

15 A. Talking about just inside the
16 switch?

17 Q. Yes.

18 A. Just inside the switch, no,
19 there's no evidence or studies that I am
20 aware of that indicate anything different
21 than that.

22 Q. In a brake switch case then how
23 does the fire spread in the initial
24 ignition of the switch itself?

25 A. And that's where some speculation

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1 energized, may or may not have been fused
2 and may or may not have any electrical
3 arking activity on it because we don't see
4 any. And I want to know how you're able to
5 look at the fire patterns and tell me that
6 this was not a switch because there's a
7 difference in the fire patterns caused by
8 the switch fire versus this fire,
9 especially in light of the fact that you
10 just told me it can burn a million
11 different ways in a switch fire.

12 A. Well, again, I don't see a
13 question. What are you asking me?

14 Q. If a switch fire can occur in a
15 million different ways and apparently cause
16 many different fire patterns, how were you
17 able to distinguish between this being a
18 switch fire and some other cause as you
19 have alleged?

20 A. Because the things that typically
21 are consumed in a switch fire -- and I
22 can't always tell you exactly how the fire
23 will progress -- the things that are
24 typically consumed in a switch fire or a
25 suspected switch fire were not consumed in

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1 comes into play.

2 Q. What do you think the normal
3 spread is?

4 A. I really couldn't tell you the
5 normal spread. I can just tell you
6 different observations that have been made.
7 There's a couple of things that's going on.

8 Q. It can happen in a lot of ways.

9 A. Depending on the circumstances
10 that were surrounding it, yes.

11 Q. How do you know that it didn't
12 burn in a way that looks exactly like or
13 indistinguishable from your alleged cause,
14 this wire?

15 A. I'm sorry. We were talking about
16 the switch. Now we're talking about a
17 wire?

18 Q. Yeah. The whole reason I want to
19 know how the fire spreads in a switch case
20 is because you're saying that you were able
21 to go out there in February of 2003 and
22 look at fire patterns, damage gradients and
23 distinguish between a switch fire and this
24 fire that you allege was caused by a
25 16-gauge wire that may or may not have been

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1 this vehicle and other things were.

2 Q. Okay. You mentioned the rubber
3 grommet. What else? What else wasn't
4 consumed that normally was?

5 A. The steering shaft has a grommet
6 and a seal around it also where it goes
7 through the dash panel.

8 Q. Okay.

9 A. The driver's side of the engine,
10 the rocker cover which is made of
11 fiberglass was not severely damaged
12 indicating that the fire was farther away
13 from it than where the switch is mounted.
14 The proportioning valve as I recall when I
15 saw it at Mr. Stringer's office, although
16 his pictures show it still intact in the
17 vehicle, but it was actually broken, one of
18 the proportioning valves was broken loose,
19 which made me think it might have seen a
20 little more heat than the other one.
21 That's why it came loose from the assembly.
22 It was one that was more outboard. The
23 relative -- sometimes the relative damage
24 between the two proportioning valves is the
25 indicator of the direction of heat flow.

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1 So all of these things were pointing toward
2 something farther outboard in the vehicle
3 than the switch being the area of origin in
4 this fire.

5 Q. Okay.

6 A. I would have had no reason to
7 look where this wire is because it was
8 underneath an existing wire harness if the
9 patterns on the vehicle didn't lead me to
10 look there.

11 Q. All right. And I know you're
12 being tendered at trial not as a fire cause
13 and origin expert, which are 99 percent of
14 my questions, but I'm still intrigued.
15 What was the wind speed and direction on
16 the night of this fire?

17 A. I do not know.

18 Q. Never checked, did you?

19 A. No, sir.

20 Q. Okay. Nor do you know the
21 location of the house and carport or any
22 other obstacle in comparison to the wind
23 speed and direction?

24 A. Not as far as the wind speed is
25 concerned, the Baton Rouge Fire Department

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1 photographs and having driven by the
2 address give me a rough idea of how the
3 structures played together and where the
4 vehicle was roughly but --

5 Q. Does the house face east, west,
6 north, south?

7 A. I believe the house, the front of
8 the house faces north, I think, if memory
9 serves me correctly.

10 Q. How long do you think this fire
11 burned before extinguishment?

12 A. I don't recall seeing a fire
13 report on it, so I'm not certain how long
14 it was.

15 Q. Well, based on the fact that
16 you've looked at a couple hundred of these,
17 how long do you think this fire burned?

18 A. My guess would be somewhere
19 between 15 and 30 minutes.

20 Q. In the 200 or so fires you've
21 investigated on a scale of one to ten where
22 is the severity of damage for this vehicle?

23 A. Well, actually I would just go
24 based on the percentage of the vehicle,
25 typically how we kind of describe them, the

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1 engine compartment is pretty damaged, but
2 there's still some of the plastic left on
3 the front and from the eight pillars back,
4 it was still fairly well intact so I would
5 say this is about 20 to 25 percent
6 consumed.

7 Q. Of the 200 or so fires you've
8 investigated, underhood fires involving
9 these vehicles, would this be -- what
10 percentage would be more severely burned
11 than this vehicle?

12 A. I don't know. That's a guess. I
13 really don't know an answer to that
14 question.

15 Q. Okay. If we exclude any fire
16 cause and origin investigation, what have
17 you done in connection with this claim?

18 A. What do you mean?

19 Q. You're going to testify at trial
20 as to what, an engineer on the design of
21 the vehicle or what?

22 A. That was my assumption.

23 Q. Okay.

24 A. And the components of the
25 vehicle.

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1 Q. In your area of origin, what
2 other devices are energized when the
3 vehicle is off?

4 A. The devices themselves that are
5 energized, the brake pressure switch.

6 Q. Or wiring or anything what is in
7 that area of --

8 A. The head lamp wiring runs through
9 that, the main harness really between the
10 interior and the engine compartment goes
11 through the area of origin. All of the --

12 Q. It remains energized?

13 A. Some of the circuits do. The
14 head lamps do, the parking lamps need to
15 function according to safety regulations.
16 So there are circuits in there that could
17 be energized, power going to them.

18 Q. The wires running to the switches
19 are energized, but the wires running from
20 the switches, head lamps and the parking
21 lamps, et cetera, are de-energized until
22 the switch is on?

23 A. Right, but the power feeds to
24 them.

25 Q. They run through your general

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1 area of origin?
 2 A. Above it, the wire harness passes
 3 through that area from the engine
 4 compartment to the interior.
 5 Q. It's in your area of origin, that
 6 wiring harness?
 7 A. That area I described as being
 8 from the brake booster over and from the
 9 base of the dash panel up, yes, it goes
 10 through there.
 11 Q. Okay. Anything else?
 12 A. Anything else?
 13 Q. In your area of origin that would
 14 have been energized?
 15 A. I don't think so. There might be
 16 one more wire, kind of getting off to the
 17 edges now, that goes to the windshield
 18 wipers. I don't think that's energized.
 19 Q. Did you see anything in the
 20 documentation that you have regarding this
 21 particular vehicle that would help rule in
 22 or rule out any potential causes of this
 23 fire?
 24 A. As far as the Ford records are
 25 concerned?

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1 Q. Sure.
 2 A. No, there's nothing sensational
 3 about the --
 4 Q. Nothing significant?
 5 A. -- the records of this vehicle,
 6 no.
 7 Q. Do you have any evidence of
 8 abuse, misuse that may have led to this
 9 fire?
 10 A. No, not specifically.
 11 Q. Failure to maintain, failure to
 12 repair, anything like that?
 13 A. I don't remember if it has been
 14 maintained properly. There are no records
 15 one way or the other whether it was
 16 maintained properly or improperly. It's an
 17 old vehicle. It was seven-and-a-half years
 18 old, had quite a few miles on it.
 19 Q. You didn't see anything on the
 20 physical evidence that would indicate any
 21 type of owner fault?
 22 A. There was some minor -- what
 23 appeared to be sheet metal damage to the
 24 driver's side fender, but I don't know if
 25 that could have had anything to do with

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1 this or not. But as far as tearing down an
 2 engine or transmission to look at how worn
 3 out it is --
 4 Q. I'm talking about only as to
 5 potential cause of this fire, did you see
 6 anything that would indicate owner fault or
 7 some third party fault that may have led to
 8 this fire?
 9 A. Other than the wire through the
 10 hole in the dash, no.
 11 Q. Have you seen any anything that
 12 would indicate that there was an
 13 aftermarket product in use in this vehicle
 14 at the time of the fire?
 15 A. No.
 16 Q. You really don't even know if the
 17 wire was still energized at the time of the
 18 fire?
 19 A. Not really, not without specific
 20 excavation to find out where the other end
 21 of the wire was in the interior of the
 22 vehicle.
 23 Q. Is there anything that you intend
 24 to do or want to do in connection with your
 25 opinions on this particular fire?

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1 A. Not at the moment.
 2 MR. PIPES:
 3 All right. That's all I
 4 have. Thank you. Let's just get
 5 black-and-whites, Jim.
 6 (Whereupon the deposition was
 7 concluded at 4:18 p.m.)
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VIEWER'S CERTIFICATE

I have read or have had the foregoing testimony read to me and hereby certify that it is a true and correct transcription of my testimony, with the exception of any attached corrections or changes.

MARK E. KOFFMAN

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REPORTER'S CERTIFICATE

I, KELLY S. WALLACE, Certified Court Reporter, in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that MARK E. KOFFMAN, after having been duly sworn by me upon subornity of N.S. 37:2334, did testify as hereinbefore set forth in the foregoing 172 pages; that this testimony was reported by me in the shorthand reporting method, was prepared and transcribed by me or under my personal direction and supervision, and is a true and correct transcript to the best of my ability and understanding; that I am not related to counsel or the parties herein, nor am I otherwise interested in the outcome of this matter.

KELLY S. WALLACE
Certified Court Reporter
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