

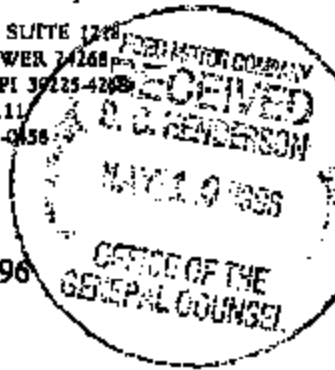
LAW OFFICES OF
CHERRY, GIVENS, PETERS,
LOCKETT & DIAZ, P. A.

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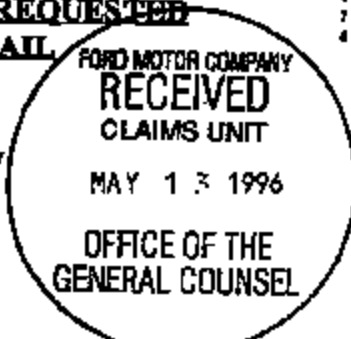
May 2, 1996



- ¹ Member Alabama Bar
- ² Member Alabama, Florida and Georgia Bar
- ³ Also Member Louisiana Bar
- ⁴ Also Member Colorado Bar
- ⁵ Member Alabama and Florida Bar
- ⁶ Member Alabama and Virginia Bar
- ⁷ Member Alabama and Georgia Bar
- ⁸ Member Georgia Bar

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
VIA U.S. MAIL

Denise Henderson
Office of General Counsel for Ford Motor Company
Consumer Affairs Division
300 Renaissance Center
Post Office Box 43358
Detroit, Michigan 48243



CONSUMER AFFAIRS SECTION
76 MAY -7

Re: **Our Clients:** [REDACTED]
Type of Claim: Products Liability, 1992 Mercury Grand Marquis
Type of Incident: Premises Fire
Date of Incident: December 6, 1995
Location of Incident: Newton County, Mississippi

REDACTED

Dear Ms. Henderson:

This letter will follow our retainer by [REDACTED] concerning a fire that occurred at their property in Newton County, Mississippi on December 6, 1995.

The point of origin has been traced to a 1992 Mercury Grand Marquis that was located in their garage on the night of the fire. Fire Investigators and associate experts hired by the State Farm Mutual Fire Insurance Company confirm point of origin. It is our clients' full intention to bring a cause of action in tort against the Ford Motor Company for subsequent damages.

We request that upon your receipt of this correspondence that you suspend any attempt at future contacts with our client and please direct any and all communication concerning this matter directly to me.

3000 Riverchase
Suite 450
Birmingham, Alabama 35244
(205) 985-3720
Fax: (205) 985-3730

125 West Main Street
Post Office Box 927
Dothan, Alabama 36302
(205) 793-1555
Fax: (205) 793-8280

401 Church Street
Post Office Drawer 1129
Mobile, Alabama 36683
(205) 432-1700
Fax: (205) 432-1736

EA02-025 37372 H

Denise Henderson
May 2, 1996
Page 2

In the coming weeks, we will provide your office with information concerning the vehicle in question along with initial estimates of damages.

We would enjoy the opportunity to discuss this matter with you in person. Please telephone me at 1-800-459-2222.

Sincerely,

**CHERRY, GIVENS, PETERS,
LOCKETT & DIAZ, P.A.**

By: 
ANDREW MIMMS DYESS
Case Manager

AMD/lav
cc: Rick & Margie Billow

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

VEHICLE INFORMATION						REPAIR INFORMATION																					
SERIAL NUMBER	CAR MFR	B/S	STY	PLT	CCI	PROD DATE	WARR DATE	SELL DEALR	CLAIM NUMBER	MICRO NUMBER	C	WCC	PART NUMBER	CC	CCC	CD	REPR DATE	Y	TACT IS	WILDS CODE	MATL. COST	TOTL COST	LBR HRS	REPR	ST DEALR		
619135		Y	STM							LP48171	6J02	726412	57				06MAY91	1*	2		887	0.00	40	1.0	12211	MS	
** COMMENTS-CLAIM #1 TECH-RR DOOR HARD TO OPEN FOR EXTER-REI DOOR PANEL TO STRAIGHTEN HOOS, REPAIR LATCH																											
619135		Y	STM							KEM88611	6K04	ALBAL	67				16MAY91	1*	2		1584	0.00	62	1.6	12025	MS	
** COMMENTS-CLAIM #2 TECH-CHECK BRAKES FOR SHOOTER BAND AND DEGLAZE FRONT BRAKES																											
619135		Y	STM							TJ47591	7K07	10649	X1				21JAN92	1*	M13		18619	103.78	416	8.0	12826	MS	
** COMMENTS-CLAIM #3 TECH-REPLACE INST CLUSTER TRACK WIRES FOR SHORT REPAIRS IN CIRCUIT #797 ABNORM																											
619135		Y	STM							LOL6161	7F08	17603	55	W05	55		23JUL92	1*	M04		21108	10.43	34	0.6	12219	MS	
619135		Y	STM							LOL6162	6Q01	170557	05	F01	05		23JUL92	1*	M04		21108	0.00	66	0.0	12219	MS	
** COMMENTS-CLAIM #4 COOK-PAINT FRONT BUMPER COVER CENTER, PAINT PEELING OFF																											
619135		Y	STM							FFF0421	5V01	1125	13	W27	13		12NOV92	1*	M04		26212	167.17	214	1.2	12219	MS	
619135		Y	STM							PTF08011	7M07	16805	42	A04	42		30NOV92	1*	M04		26854	0.00	25	0.6	12219	MS	
** COMMENTS-CLAIM #7 TECH-THIS IS BUMPER TO BUMPER WARRANTY NO SEASONAL																											
619135		Y	STM							LL5521	3A11	7003	30	F17	30		07SEP91	1*	F01		37647	340.77	751	8.1	10310	TY	
** COMMENTS-CLAIM #8 COOK-TONE TO SHOP. 1ST SHIP ONLY, WILL NOT SHIPT																											
TECH-TRANS DIAG. R&R TRANS & COMPLETELY OVERHAUL. FLUSHOILS.																											
619135		Y	STM							WELL5622	3A11	7003	30	A33	30		07SEP91	1*	F01		37647	-50.00	-50	0.0	10310	TY	
619135		Y	STM							UMN39131	2G02	9F472	49	K23	49		23FEB94	1*	S07		44951	51.13	97	1.1	12219	MS	

* CLAIM #18 OF 10 TOTAL CLAIMS
 * THIS LISTING CONTAINED 10 TOTAL CLAIMS

CSQR0004

MORS II Contact History Summary by VIN

04/24/1997 16:19:11

VIN: 2MECM75W6ND [REDACTED] Year: 92 Model: GRAND MARQUIS

To TRANSFER contact information: Type a "T" in the "A" column and Press ENTER
To VIEW contact information: Type a "X" in the "A" column and Press ENTER

Contact A Number	Form/ File Type	Open Date	Close Date	Last Hdlg Date	Status	O.R. Customer
-	-	-	-	-	-	-
- 102703962	INQ	09/07/1993	09/07/1993	09/07/1993	CLOSED	

F1=HELP F3=EXIT F7=FIRST F8=NEXT
1020 FIRST VIN SUMMARY SCREEN DISPLAYED

OGDE191

CSOR0062

MORS II Inquiry Contact

04/24/1997 16:19:39

ATLANTA
VIN:
Last Name:
Title:
Address:
City:
Home Phone:
Year: 92
Mileage/Km:

21. Zn/Tr: B3 M/A:
2MECM75W6NX

CONTACT NBR: 102703962
Analyst: 7524CW

Opened: 09/07/1993
Closed: 09/07/1993
Status: CLOSED
MI:

First Name:

ST/PV: Zip/PC: CC:
Business Phone: Ext:
Model: GRAND MARQUIS
WSD: 05/15/1991

Dealer Name: KNOXVILLE LINCOLN-MERC SALES CODE: 326242 P&A: 10310
Causal Code:
Inquiry Code: 401 COVERAGE Symptoms:

More Comments?: N
Letter Code:

Follow Up?: N Comm Type: P Micro Nbr:

DENNIS FROM THE DEALERSHIP CALLED REGARDING THE WARRANTY. DENNIS SAYS THAT THE OASIS SCREEN SHOULD SHOW THIS VEHICLE IS COVERED BY A 48/50 POWERTRAIN WARRANTY, NOT THE 36/36 FOR MOST '92 VEHICLES. CAC ADVISED DENNIS TO CALL THE DISTRICT OFFICE OR THE BAC.

F1=HELP F3=EXIT F4=CMTS F5=ADD F6=UPD F9=CLS F10=CRN UP F11=REGN UP F12=INFO UP
1053 REQUESTED CONTACT DISPLAYED OGDB191

CSOR0010

MORS II Contact Comments

04/24/1997 16:19:49

Last Name:
Home Phone:
Dealer:

Bus. Phone:
KNOXVILLE LINCOLN-MERC

VIN: 2MECM75W6NX [REDACTED]
Ext:
Dist/Reg: 21

CONTACT NBR: 102703962
File Type: INQ
Comm Type: P PHONE

Date: 09/07/1993
Time: 12:21:27
Micro:

Analyst Code: 7524CW
Analyst Name: WONG POSPESHIL
Letter Code:

Comments:

More?: N

DENNIS FROM THE DEALERSHIP CALLED REGARDING THE WARRANTY. DENNIS SAYS THAT THE OASIS SCREEN SHOULD SHOW THIS VEHICLE IS COVERED BY A 48/50 POWERTRAIN WARRANTY, NOT THE 36/36 FOR MOST '92 VEHICLES. CAC ADVISED DENNIS TO CALL THE DISTRICT OFFICE OR THE BAC.

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

OGDE191

CSOR0021

MORS II Recall Inquiry

04/24/1997 16:20:09

VIN: 2MECM75W6NX [REDACTED]
Year: 92 Model: GRAND MARQUIS

Build Date: 04/11/1991
WSD: 05/15/1991

Campaign Number	Campaign Type	1864 Description	Campaign Status	Status Date	Dealer Code
94B58	0	OWNER GUIDE	FORCED COMPLETION	03/04/1996	AUTOC

F3=EXIT

1002 REQUESTED INFORMATION DISPLAYED

OGDB191

CSOR0024

MORS II OASIS Inquiry

04/24/97 16:20:18

VIN: 2MECM75W6N [REDACTED] Year: 92 Model: GRAND MARQUIS
Name:

Calib: 218AR00 Build Date: 04/11/1991
Axle: NOT AVAILABLE WSD: 05/15/1991
Engine: 4.6L SOHC (MODULAR)
Trans: AUTOMATIC OD 4 SPEED ONP Count: 0

Recall Description

NO RECALLS

Message:

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

COVERAGE DESCRIPTION: NO ESP DATA

F3=EXIT

1002 REQUESTED INFORMATION DISPLAYED

OGDB191

ENTER VIN => 2MECM75W6NX [REDACTED]
 NAME => BILLOW ZIP => [REDACTED] MODEL YR => [REDACTED]
 OWNER NAME : [REDACTED]
 STREET ADDR : [REDACTED]
 CITY : COLLINSVILLE N/A DATE: 94-12-06
 ST/PRV: MS CTRY: ZIP/POSTAL CODE [REDACTED] N/A SOURCE: R
 MODEL YEAR : 92 PLANT: X SALE DATE: 91-04-12
 BODY STYLE DESC: 4 DOOR SEDAN LS PRODUCTION DATE: 91-04-11
 VEHICLE DESC : 1992 GRAND MARQUIS

	DIVISION	DISTRICT	ZONE	DEALER	PDC CODE	FCSD REGION
SHIP-TO	3	38	A	534	45	23
FACING	3	84		023		
RESPONSIBLE	3	22		659		

CA EMISSION :	ENGINE TAG CODE :	2G802AB	CAMPAIGN COUNTS	
NAVIS STATUS : 802	COMPANY CAR IND :		TOTAL CAMPAIGNS :	01
DSO DISTRICT :	FLEET CODE :		OPEN :	00
DSO NUMBER :	FLEET STATUS :		CLOSED :	01
			ACTIVE:	01
			HISTORY:	00

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

LPENJ82

ENTER CAMPAIGN NUMBER=> 94B58 VIN=> 2MECM75W6N[REDACTED] TYPE OF SEARCH: A
 MODEL YEAR: 92 DEFECT: OWNER GUIDE BODY STYLE: 4 DOOR SEDAN LS
 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: 4
 CURRENT: 3 22 659 ASSIGNED: 94-12-06 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
N	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
 I037-NO MORE DATA TO DISPLAY

LPENJ82

ENTER CAMPAIGN NBR ==> 94858 VIN ==> 2HECM75W6NX [REDACTED]
 DEFECT : OWNER GUIDE BODY STYLE DESC: 4 DOOR SEDAN LS
 RESP DEALER : 338534 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 : BILLOW INITIALS: R
 STREET ADDR1 : RR 1 BOX 120-A
 ADDR2 : ST/PRV: MS
 CITY : COLLINSVILLE CTRY:
 ZIP/POSTAL CODE: 39325 N-A SOURCE: R N-A EFF DATE: 94-12-06

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 LPENJ82

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY and STATE
FARM FIRE & CASUALTY COMPANY PLAINTIFFS

VS. CIVIL ACTION NO. 3:97cv310WS

FORD MOTOR COMPANY DEFENDANT

DEPOSITION OF WALTER RALPH NEWELL

APPEARANCES NOTED HERIN

Taken at the instance of the plaintiffs at the
offices of Davis, Goss & Williams, Jackson,
Mississippi, on Friday, June 19, 1998, beginning at
9:03 a.m.

KAREN S. HALL, CSR
Mississippi CSR No. 1196
Winstead & Associates
216 Thompson Lane
Jackson, Mississippi 39208
Telephone: 601-936-4466

COPY

A P P E A R A N C E S

FOR THE PLAINTIFFS:

MR. PATRICK F. McALLISTER
MR. REEVE G. JACOBUS, JR.
Williford, McAllister & Jacobus
537 Trustmark Building
Jackson, Mississippi 39201

FOR THE DEFENDANT:

MR. GREGORY K. DAVIS
Davis, Goss & Williams
One Jackson Place, Suite 925
Jackson, Mississippi 39201

ALSO PRESENT: Mr. Kevin Lewis
Mr. Samuel Williford

1 (Witness sworn.)

2 MR. McALLISTER: This is the deposition of
3 [REDACTED] being taken pursuant to notice under
4 the Federal Rules of Civil Procedure in Cause
5 No. 3:97cv310WS.

6 WALTER RALPH NEWELL,
7 having been duly sworn, was examined and testified
8 as follows:

9 EXAMINATION

10 BY MR. McALLISTER:

11 Q. Would you state your name for the record.

12 A. [REDACTED]

13 Q. [REDACTED] do you want to read and sign
14 your deposition?

15 A. I'll reserve that until the end of the
16 deposition.

17 Q. All right. You're going to let us know? -

18 A. Yeah.

19 Q. Okay. You've had your deposition taken
20 before?

21 A. Yes, I have.

22 Q. How many times, do you think?

23 A. More than 150.

24 Q. Okay. I'm not going to give you all the
25 standard instructions that we normally give

1 deponents and these about, you know, you let me know
2 if you don't understand my question and answer yes
3 or no, all that sort of stuff. Okay?

4 A. Right.

5 Q. And you've been through that before?

6 A. Yes, I have.

7 Q. It's my understanding that you have been
8 hired by Ford Motor Company to assist them in the
9 cause and origin of an automobile fire that occurred
10 on December 6, I believe, 1995. Is that right?

11 A. I believe that's correct, yeah.

12 Q. I've been provided with your CV, and I'd
13 like to ask you a couple of questions.

14 MR. McALLISTER: Let's have this marked as
15 the first exhibit.

16 (Exhibit No. 1 marked.)

17 MR. McALLISTER:

18 Q. I hand you what's been marked as Exhibit 1.
19 And as I understand it, that consists of four pages
20 summarizing your experience and background and then
21 a listing of cases in which you have given live
22 testimony at trial, as I understand it. Is that
23 right?

24 A. Yeah. There's both live testimony and
25 deposition testimony in this list.

1 Q. Okay.

2 A. And it's set out differently, but you're
3 correct. This was prepared in response to the
4 Federal Rules.

5 Q. All right. Now, is your listing of case
6 testimony and live testimony current as of today?

7 A. Ooh, I doubt that. In fact, this may have
8 been redone just recently and put in a different
9 order.

10 Q. You got another copy?

11 A. I don't -- not with me, but I'm sure --
12 there's probably one in my office. I know my office
13 manager was working on this.

14 Q. Can you get somebody to fax us one?

15 A. Probably.

16 MR. McALLISTER: Can we take a break and
17 get them to fax a current copy?

18 A. Let me call her right quick.

19 (Off the record.)

20 MR. McALLISTER:

21 Q. While we're waiting for your updated case
22 and deposition testimony to be faxed to us, let me
23 just ask you a couple of questions about your
24 resume. As I understand it, you are the president
25 of Newell Investigative Services?

1 A. That's right.

2 Q. And what does Newell Investigative Services
3 do?

4 A. It's a fire investigation company.

5 Q. All right. Is it limited to fires?

6 A. Yes.

7 Q. Okay.

8 A. That's all we do.

9 Q. All right.

10 A. Fire-related cases. Now, you can't just
11 say fire, but every case we work on is involving
12 fire somewhat.

13 Q. All right. As I understand it, you say in
14 your CV that you've handled more than 3,000 cases
15 involving structures, heavy equipment, vehicles,
16 airplanes, and water crafts?

17 A. Probably more than 4,000 now.

18 Q. Okay. What percentage of that is
19 automobile fires?

20 A. Over 50 percent.

21 Q. Okay. Has that increased over time?

22 A. Yeah. In the last 10 or 15 years, it has,
23 tremendously.

24 Q. And would you say today that you're doing
25 50 percent vehicle fires?

1 A. Probably more than that.

2 Q. Sixty percent? Seventy --

3 A. Sixty --

4 Q. -- percent?

5 A. -- 65.

6 Q. Okay.

7 A. Personally, I'm probably doing 75; but the

8 company is probably running about 60, 65 percent.

9 Q. So yours personally, you do 75.

10 A. I -- I would think that'd be true, yeah.

11 Q. Okay. What percentage of your business in

12 the last three years has been for Ford Motor

13 Company?

14 A. Of my -- of the company business, it was --

15 I'm only -- I can only guess. I don't know the

16 answer to that, but -- and I can only give you an

17 approximate on that anyway. Company business, it'd

18 probably run 15, 20 percent.

19 Q. And what about yours personally?

20 A. Mine personally, probably run 25 or 30

21 percent.

22 Q. Okay. Are you the sole owner of NIS?

23 A. I am now.

24 Q. Okay. You have any employees?

25 A. Yes.

1 Q. How many employees do you have?

2 A. I have a full-time office manager, one
3 full-time investigator, and two part-time
4 investigators.

5 Q. All right. Do you hold any licenses?

6 A. Yes.

7 Q. And what licenses do you hold?

8 A. Hold a private investigators license in the
9 state of Georgia and South Carolina.

10 Q. Okay. You're not a registered engineer?

11 A. No, I'm not.

12 Q. Okay. Do you have any training as an
13 electrical engineer?

14 A. No.

15 Q. Any education as an electrical engineer?

16 A. Well, an -- not as an engineer.

17 Q. That's my question, as an engineer.

18 A. No.

19 Q. Okay. You own any stock in Ford Motor
20 Company?

21 A. No. I wish I did.

22 Q. You drive a Ford?

23 A. Yes, I do.

24 Q. Okay. What kind of Ford do you drive?

25 A. I have a '98 Crown Vic and a '95 F150.

1 Q. I realize that we're waiting to get your
2 updated case testimony delivered to us, but would
3 you look at a copy of the one that you have right
4 now that's been marked as Exhibit No. 1.

5 A. Uh-huh. I got it.

6 Q. Okay. When I looked at this, it appeared
7 to me that since 1995, of the listed trial
8 testimonies, 13 of those --

9 A. Where you at?

10 Q. Case testimony.

11 A. Oh, you're under case testimony. Okay.
12 Actually, the CV and the case testimony were stapled
13 together for some reason, but they're actually
14 separate. I don't know why they're attached. It's
15 two different things. Okay.

16 Q. From 1995 through the cases listed, you've
17 listed 13 trial testimonies?

18 A. Probably.

19 Q. Thirteen for Ford and a total of 20.

20 A. Yeah, probably.

21 Q. And that'd be about a two-to-one ratio. Is
22 that correct?

23 A. Yeah.

24 Q. So of the cases that have actually gone to
25 trial in which you've been hired as an expert,

1 two-thirds of those have been for Ford in the last
2 couple of years.

3 A. According to your numbers you just read,
4 that'd be right. I've never counted them, but --

5 Q. All right. Is the listing that's being
6 faxed to us -- will that describe the cause of
7 action in each of these cases?

8 A. It should, as best we had as to what the
9 allegation was.

10 Q. All right. The way you have the case
11 testimony listed -- just for example, the very first
12 one is Hebert versus Ford Motor Company?

13 A. Right.

14 Q. Does that indicate that you were retained
15 by Ford Motor Company?

16 A. Well, it doesn't say at all, but I know I
17 was.

18 Q. Okay. In each of the cases listed in which
19 Ford Motor Company is listed as a party, were you
20 retained by Ford Motor Company?

21 A. Yes.

22 Q. Okay. And that would be --

23 A. I have not testified against Ford, if
24 that's what you're going to ask me.

25 Q. Yeah, that is what I'm asking.

1 A. No, I haven't.

2 Q. Okay. And that would be true for the
3 depositions as well.

4 A. That's correct.

5 Q. All right. Well, I've got some questions
6 about these cases, but I will wait until we get your
7 -- the updated version, which may help you remember
8 some of these things a little bit more.

9 A. Okay.

10 Q. Would you tell me, just in general, the
11 steps you take as a cause and origin investigator in
12 conducting a fire investigation of a fire similar to
13 that at issue here.

14 A. If you're talking about involving a
15 consulting type investigation in -- on a case
16 similar to this, I can; or I can tell you how I
17 would do it if I got it originally.

18 Q. Well, tell me how you would do it
19 originally.

20 A. Originally, if I received an assignment as
21 in -- from State Farm Insurance Company, for
22 instance, I would conduct -- I most likely would be
23 charged with conducting an origin and cause
24 investigation. That origin and cause investigation
25 would not only include the fire scene, it would

1 include an interview with any fire fighters that --
2 that I could locate that were present at the scene,
3 local investigators, the person that discovered the
4 fire and/or the owners. And in this case, it would
5 be one and the same, the residents and the people
6 that discovered it.

7 Q. Okay. What exactly would you do in
8 conducting your investigation?

9 A. In what way? What part of it?

10 Q. Well, your examination of the fire scene.
11 Let's start with that.

12 A. Well, in a fire scene, I would use either
13 the reverse or process of elimination method and use
14 it basically as set out in NFPA 921. I would --
15 first and foremost, I would decide what was needed
16 for the investigation. I would then put together
17 the investigation in my own mind or in writing,
18 whatever I need to; put together -- the equipment
19 together I needed to use -- cameras, clothing,
20 shovels, whatever is needed -- decide what facts
21 needed to be gathered as to statements and
22 interviews. And then once I did the scene, I
23 probably would do it in the reverse method, which I
24 know Jimmy Vickers does too.

25 Q. All right. Tell me what's the reverse

1 method.

2 A. Reverse method is the method that's used
3 probably more than any method in -- in the world, in
4 that you begin at the point of least damage and
5 investigate fire backwards, in reverse. It's called
6 the process of elimination also. You investigate
7 the fire back to the area of heaviest damage or the
8 area of origin as you can establish; but on the way,
9 you're eliminating or involving any other cause.
10 Any heat producing devices have to be examined,
11 noted, and eliminated.

12 Once you're in the area of origin, then you
13 -- it becomes a much more detailed investigation as
14 to getting down to the point of origin and hopefully
15 the cause.

16 Q. Let me --

17 A. That's not always true, but it -- hopefully
18 it is.

19 Q. Let me interrupt you for a second. So you
20 would use some sort of directional method from the
21 point of least damage back? Is that correct?

22 A. That's right.

23 Q. All right. And how would you -- so you
24 would look for an area that was not burned at all.
25 Correct?

1 A. No, you can't -- sometimes you don't have
2 those. Sometimes you're not blessed with that.
3 Sometimes you have to go to the least damaged area,
4 but there may be fire damage there.

5 Q. All right.

6 A. And you have to have a beginning and ending
7 point. It's not a shotgun effect you use in fire
8 investigations.

9 Q. Okay. What do you look for in tracing the
10 steps back to the point of most damage?

11 A. Well, you're -- you're reading burn
12 patterns, charring, fire damage, fuel load, wind
13 direction, all sorts of things. There's no one
14 indicator. There's many indicators. One indicator
15 only tells you there's one thing happened, but it
16 takes it all put together to tell you what happened.

17 Q. Okay. In a consulting, is -- would that --
18 summarize how you would go about a reverse method if
19 you were originally hired?

20 A. Yes. And --

21 Q. Okay.

22 A. -- when you -- when we talk about
23 consulting, it's -- these type cases are when I'm
24 called in and I may not have a fire scene I can look
25 at. It may be destroyed or it may be repaired, or

1 it just may be weathered and exposed to the point
2 that it's destroyed so bad I can't do anything with
3 it. And at that point, you use all the information
4 available in the file, including previous reports,
5 other investigators' information and photographs,
6 anything you can get.

7 Q. And that's what you did in this case.

8 A. That's all I could do in this case.

9 Q. Okay.

10 A. I did have a fire scene -- I don't want to
11 sandbag you. I did have a fire scene and I had a
12 vehicle, but they were of no help at all.

13 Q. Okay. Were the photographs taken by Mr.
14 Vickers immediately following the fire scene
15 helpful?

16 A. They were somewhat informative, but they
17 weren't helpful as to determining cause of the fire.

18 Q. Why not?

19 A. Well, photographs are made from the eye of
20 the photographer; and I need to personally look at
21 the whole car, because I may understand the car
22 better than Jimmy. I don't know.

23 Q. Or worse.

24 A. Or worse, one of the two; but either way,
25 the fair shake is to get to look at the car in that

1 kind of condition and be able to read the patterns
2 in my own mind and -- and examine it to give it the
3 -- the whole -- whole fair picture.

4 Q. For the cases listed on the case testimony,
5 do you know if Ford hired you on a consulting basis
6 or an original basis for those cases?

7 A. I'd have to go through each one
8 individually to tell you that. I -- and I may or
9 may not know now it's been so many years, but a lot
10 of them are post-impact fires and --

11 MR. McALLISTER: Is that the documents?
12 Let's see what we've got.

13 MR. DAVIS: I was going to make four copies
14 of them.

15 MR. McALLISTER: Okay.

16 A. But probably quite a few of them's going to
17 be consulting type cases.

18 MR. McALLISTER:

19 Q. Okay. The majority would be consulting?

20 A. I don't know. You're putting words in my
21 mouth. I said probably. I don't know what they
22 are.

23 Q. Well, would your detailed summary reflect
24 that?

25 A. Could, yeah.

1 Q. Okay.

2 A. Some of them are going to be claims that
3 came in early and I got to look at early on.

4 Q. All right. Let me just ask you in general
5 what steps you would take in investigating an
6 automobile fire where the eyewitnesses to the fire
7 state that the car had been parked for at least
8 eight hours and that they witnessed the car burning
9 under the hood in a specific area.

10 A. Well, there's no question of what I would
11 do. Eyewitness testimony is important; but
12 eyewitness testimony of a layman is important only
13 to the extent that they point you to where you're
14 going, but you still would not change your way of
15 investigating. You still would begin at -- at --
16 you follow -- trained fire investigators have an
17 established SOP, if they're smart, and they follow
18 an accepted method. And even with eyewitness
19 testimony, the worst mistake you can make is go
20 straight to where an eyewitness told you something
21 happened, because you then have tunnel vision and
22 you're not giving the -- the whole picture the --
23 the overall look that it should get. No, I wouldn't
24 change my way of doing it at all --

25 Q. Well --

1 A. -- even in a car fire.

2 Q. Okay. Let's take a car fire that's been
3 sitting for a number of hours before the fire. What
4 difference does it make if the car would be sitting
5 there for a number of hours in determining the cause
6 and origin of the fire?

7 A. In that it would be -- you would have
8 eliminated -- as far as the car itself goes, you
9 would be eliminating a fuel leak fire, for instance.
10 You would be eliminating a hot surface ignition
11 fire, and you would be narrowing it down to most
12 likely -- if it's in the car alone, you would be
13 narrowing it down to -- it would have to be an
14 energized source, such as electrical.

15 Q. Okay.

16 A. It's the only thing you would have left.

17 Q. So that would be --

18 A. Or arson.

19 Q. Okay. So what we're talking about is
20 either a human act or a fire caused by an electrical
21 malfunction of some kind.

22 A. That's the only ignition sources you have
23 left, yeah.

24 Q. Okay.

25 A. And I -- I -- and I emphasize if it's the

1 car we're talking about and it's not in the area of
2 the car caused by something else.

3 Q. That's right. We're talking about in the
4 car.

5 A. Right.

6 Q. Okay. What weight would you give to an
7 eyewitness -- again, we're speaking just in general
8 terms. But what weight would you give to an
9 eyewitness who concluded or who testified that the
10 fire was only in the car, under the scenario we're
11 just describing here?

12 A. Well, it's -- it's good weight as to what
13 people actually see. But what people actually see
14 have to be verified by your investigation. It ain't
15 the other way around. You -- you -- the -- you
16 should never take their information just to verify
17 your investigation, period. You should do your own
18 investigation to verify what they've told you. And
19 their way -- I mean, their -- there's no question
20 that eyewitness information is important. It's when
21 you disregard it is when you get stepped on.

22 (Off the record.)

23 MR. McALLISTER:

24 Q. Mr. Newell, we've been provided with your
25 updated case testimony and deposition testimony.

1 MR. McALLISTER: We'll mark this as the
2 next exhibit in this case.

3 (Exhibit No. 2 marked.)

4 A. We might ought to staple this thing
5 together since it's one exhibit.

6 MR. McALLISTER:

7 Q. [REDACTED], we marked your case testimony
8 and deposition testimony as Exhibit No. 2. Let me
9 just ask you a couple of questions about some of
10 these cases. On the first page of your case
11 testimony, in the case styled Hebert versus Ford
12 Motor Company, that was a case in which you were
13 hired by Ford Motor Company. Is that right?

14 A. That's right.

15 Q. And did the plaintiffs allege that a Ford
16 automobile burned up as a result of a defect in the
17 wiring harness?

18 A. Yes.

19 Q. Okay. What was your conclusion in that
20 case?

21 A. There was a short in a wire on a fire
22 department radio installed by Mr. Hebert, and it was
23 a Ranger pickup.

24 Q. Okay.

25 A. And that's where the fire started.

1 Q. And you concluded that there was no defect
2 or no negligence on the part of Ford Motor Company
3 as part of your investigation?

4 A. Yeah. It was aftermarket wiring that was
5 actually shorted and not the -- any of the factory
6 wiring.

7 Q. All right. On the second page, you've got
8 listed a case from the Southern District of Ohio,
9 Stanley (sic) versus Ford Motor Company.

10 A. That's --

11 Q. A garage fire?

12 A. Staley.

13 Q. Staley. Pardon me. Staley.

14 A. Right.

15 Q. Thank you.

16 A. Staley.

17 Q. Staley. A garage fire.

18 A. That's right.

19 Q. Do you recall why Ford Motor Company was
20 sued about a garage fire?

21 A. Well, a garage fire is what it really was.
22 These are cases that I went back -- the allegation
23 was it was an electrical fire. It turned out to be
24 a garage fire. The fire actually started in the
25 garage, and the jury found that it did too.

1 Q. Okay. But the plaintiffs contended that it
2 was an electrical fire in a Ford automobile?

3 A. In a Lincoln Town Car.

4 Q. Lincoln Town Car?

5 A. Uh-huh.

6 Q. What did they allege the defect was?

7 A. It was a manufacturing defect in that they
8 alleged a wire, that they couldn't even tell us
9 where the wire went, was pinched when the inner
10 fender well was installed at the bulkhead and the
11 wire was pinched between the two.

12 Q. And they -- their experts -- the
13 plaintiffs' experts in that case concluded it was an
14 electrical fire originating --

15 A. Right.

16 Q. -- in the automobile?

17 A. Right.

18 Q. How did you reach the conclusion it was a
19 garage fire as opposed to a fire originating in the
20 automobile?

21 A. Well, first off, we -- we reached it by the
22 fact that the car contained no burn patterns from an
23 interior fire. It was all from exterior entering
24 through the right front wheel well. Their own
25 photographs showed the fire originating in items

1 stored -- in a battery charger and some other items
2 that were stored directly adjacent to the car.

3 Q. Okay. For the Hebert case, were you hired
4 on a consulting basis?

5 A. Yes.

6 Q. So that was after the fact?

7 A. Yes.

8 Q. Okay. And did you have the fire scene and
9 the automobile to examine at that point?

10 A. Nothing.

11 Q. Okay. And the Staley case, were you hired
12 on a consulting basis?

13 A. I had the vehicle, yes.

14 Q. Okay. And how much after the fire did you
15 examine the automobile?

16 A. I don't remember. Within a year.

17 Q. All right. The next case you've got listed
18 is Hoffman versus Ford Motor Company.

19 A. Right.

20 Q. And you've got that listed as a garage fire
21 as well?

22 A. Right. Started in a garbage can where hot
23 ashes from the fireplace had been dumped that day.

24 Q. Okay. And why was Ford Motor Company sued
25 in that case?

1 A. Well, today I still -- I -- they -- they
2 came up first with a -- a cool-down fan system, then
3 they came up with an ABS system. And it was all
4 electrical, but they had three different reasons
5 before it was over with; and then -- Court of
6 Appeals threw it out, the whole thing. Went up on
7 spoliation issue to the Court of Appeals.

8 Q. So the jury found for the plaintiffs?

9 A. It never went to jury trial. It -- this is
10 in Minnesota. And don't ask me how it all works,
11 but it went -- there was a -- we had a hearing
12 before the judge, testimony hearing, on spoliation.
13 And then it went up to Court of Appeals, and the
14 Court of Appeals threw the whole case out.

15 Q. All right. Let's just talk about this a
16 little bit. I want to make sure I understand. In
17 the Hoffman case, the plaintiffs alleged that there
18 was an electrical fire. Is that correct?

19 A. Right.

20 Q. Okay. And you concluded it was not an
21 electrical fire, but rather a fire arising from
22 ashes from a fireplace.

23 A. Yes, that were placed in a rubber trash can
24 against the front bumper of the car.

25 Q. All right. And were you hired on a

1 consulting basis in that case?

2 A. Yes.

3 Q. Okay. And you say it went up to the Court
4 of Appeals on the spoliation issue. What do you
5 mean by that?

6 A. That's all I can tell you. I'm not a
7 lawyer.

8 Q. Okay. Well, what do you mean by the
9 spoliation issue?

10 A. Spoliation issue came down as a result of
11 the insurance carrier had hired an attorney; and
12 prior to Ford being put on notice, the house was
13 destroyed, even after an attorney was on board. And
14 we were never given a chance to even look at the
15 house. And Ford was put on notice some 30 days
16 after the house was destroyed.

17 Q. Okay. Well, was part of your conclusion
18 that you could not reach a determination as to the
19 cause and origin of the fire?

20 A. That didn't have anything to do with it. I
21 said all the time it was the trash can.

22 Q. Okay. So --

23 A. That the fire originated in the trash can.

24 Q. The spoliation issue had no effect on your
25 opinion.

1 A. (Shook head negatively.) I -- no. I had
2 an opinion, but I believe I could have proved it
3 without question had I been able to see the house,
4 because none of the investigators had even examined
5 and asked about the trash cans, and then it came up
6 in statements later.

7 Q. Let me just ask you a question. In this
8 case, you have asserted that "There is no protection
9 of the evidence and exfoliation is involved, in my
10 opinion."

11 A. It should be spoliation.

12 Q. Spoliation. Okay.

13 A. Yeah.

14 Q. Did you reach that same opinion in the
15 Hoffman case?

16 A. No.

17 Q. Okay. The [REDACTED] case listed on November
18 16, 1996, is that the same case?

19 A. Yeah.

20 Q. Okay.

21 A. Where are you at? In depositions?

22 Q. No. I'm on the same page.

23 A. Well....

24 Q. You see it down there on the same page?

25 A. Yeah. I don't know -- we went -- we went

1 in to testimonial type hearings more than once on
2 this. I don't know why that's on there twice. I
3 think the November 16th should be the right one.

4 Q. Okay. Every place you've got listed -- for
5 example, on the Queen City Foods case, hydraulic
6 fire, is that the conclusion that you reached? Does
7 that reflect the conclusion you reached?

8 A. Yes.

9 Q. Okay. Not necessarily what the plaintiff
10 alleged, but what you concluded.

11 A. Right.

12 Q. Okay. Well, the other Ford Motor Company
13 cases on the second page, was there any allegation
14 that the fire was electrical in origin?

15 A. No.

16 Q. Okay. On the third page, beginning with
17 the Wasilik case, were there any allegations in the
18 cases listing Ford that the fire was electrical in
19 origin?

20 A. No, none of these are.

21 Q. And I'm not going to go any further back
22 than that. I realize it's hard for -- you do a lot
23 of work and it's hard to remember all these cases
24 dating back to 1980-whatever, but let's turn to your
25 deposition summaries.

1 A. Okay. You're going to see a lot of the
2 same ones over again.

3 Q. On May 14, 1998, you apparently testified
4 for Ford Motor Company in a case filed by Anita
5 Evans. Is that right?

6 A. Yes.

7 Q. And [REDACTED] alleged that a fire was
8 caused by a faulty ignition switch. Is that
9 correct?

10 A. Yes.

11 Q. And what conclusion did you reach in that
12 case?

13 A. It was a ground fire caused by exhaust --
14 catalytic converter system.

15 Q. Okay. Were you hired on a consulting
16 basis?

17 A. Yes. That -- I testified live in that one
18 too. I don't know why she's got it on deposition
19 but doesn't have it on live testimony.

20 Q. Do you know if Ford --

21 A. Well, I know why. I know why. I see it's
22 May 14th. I just testified in this case last
23 Monday.

24 Q. Oh, okay.

25 A. That's why it's --

1 Q. This is pretty familiar then.

2 A. Yeah.

3 Q. This is pretty familiar then. Did the fact
4 that your conclusion was that it was a ground fire
5 caused by the catalytic converter system -- would
6 that have relieved Ford of liability in that case?

7 A. It would have.

8 Q. And why is that?

9 A. Because there's a warning against it,
10 number one; and number two is it's an accidental
11 fire that -- it's not a design defect. It's not
12 even a manufacturing defect. Catalytic converters
13 -- there's warnings in all owner's manuals about
14 driving in dried grass and parking in the stuff
15 because of the high temperatures.

16 Q. Okay. You also testified on May 4 for Ford
17 in a case filed by Brown Company Agricultural. Is
18 that right?

19 A. Right.

20 Q. And Brown Company also alleged a faulty
21 ignition switch?

22 A. Right. Brown County.

23 Q. Brown County?

24 A. Yeah. That's --

25 Q. Okay.

1 A. -- Brown County Agricultural.

2 Q. Okay. What conclusion did you reach in
3 that case?

4 A. Well, they recovered the ignition switch
5 and there's nothing wrong with the ignition switch,
6 but I don't know what caused the fire. I don't even
7 know where the fire began.

8 Q. So you determined it was not a faulty
9 ignition switch, but you made no opinion as to what
10 the cause of the fire was.

11 A. (Shook head negatively.)

12 Q. Okay. Why did you conclude it was not the
13 faulty ignition switch?

14 A. Because I was -- I was one of the leaders
15 of the investigative task force for ignition switch
16 fires in 1995, and I was one of the leaders that
17 studied the ignition switch fires, and I know what
18 I'm looking for when I look for an ignition switch
19 fire. I know the earmarks and I know the damages
20 that are caused by ignition switch, and there was
21 nothing wrong with this ignition switch.

22 Q. But Brown County had an expert that
23 concluded it was an ignition switch fire?

24 A. (Nodded head affirmatively.) Yeah.

25 Q. Okay. And you just disagreed with his

1 conclusion.

2 A. I've never agreed with the man on anything.

3 Q. This particular --

4 A. This particular expert.

5 Q. Well, who was it?

6 A. [REDACTED]

7 Q. [REDACTED]

8 A. Uh-huh.

9 Q. Where is [REDACTED] out of?

10 A. Minnesota.

11 Q. Okay.

12 A. I'm not trying to be smart; but if you

13 don't want an answer, don't ask me a question

14 because I answer them, I guarantee you.

15 Q. That's what I'm looking for, an answer to

16 all my questions.

17 A. Okay.

18 Q. You're going to tell me everything I want

19 to know. Right?

20 A. Yeah. Some things you might not want to

21 know.

22 Q. Some things I might not want to know.

23 Second page.

24 A. Okay.

25 Q. [REDACTED] Do you recall that case?

1 A. [REDACTED]

2 Q. [REDACTED]

3 A. [REDACTED] Yeah, I --

4 Q. It's also --

5 A. -- remember it well.

6 Q. -- an alleged ignition switch fire. Is

7 that --

8 A. Uh-huh.

9 Q. -- correct?

10 A. Right.

11 Q. And I take it you concluded it was not an

12 ignition switch fire.

13 A. I could not make a conclusion on it. This

14 case was settled.

15 Q. Okay. Well, did you render a report?

16 A. No. I gave a deposition.

17 Q. Okay. And in your deposition, as I

18 understand it, you couldn't determine one way or the

19 other?

20 A. I couldn't make a determination on it

21 period.

22 Q. Okay. Why not?

23 A. Too much damage to everything.

24 Q. At Locke, 1997, that's also an alleged

25 ignition switch fire? Is that correct?

1 A. Right.

2 Q. Okay. And what was your conclusion reached
3 in that case?

4 A. I don't really remember what that -- I
5 remember where Locke was, but I don't remember all
6 the story on Locke. I can't quite answer that
7 question.

8 Q. You don't recall what your report was?

9 A. No. It was in Jackson, Tennessee, is the
10 only thing I can remember about that case.

11 Q. Okay. You also have a [REDACTED] listed.
12 That doesn't have a type of fire. Do you recall
13 what type of fire that was?

14 A. No. The only reason -- we only knew,
15 according to our books, that I had given a
16 deposition in it. We don't have the file anymore.

17 Q. All right. You have a [REDACTED] listed
18 without a cause. Do you know what type of fire that
19 was?

20 A. Yes.

21 Q. What type of fire was that?

22 A. That was a lady that hit a tree. That was
23 a post-collision fire.

24 Q. Post-collision fire?

25 A. (Nodded head affirmatively.)

1 Q. On the next page, you have a [REDACTED] listed
2 that you gave a deposition on September 23, 1996,
3 for an alleged electrical fire.

4 A. Right.

5 Q. What was the plaintiff's allegations in
6 that case?

7 A. The allegation was it was an electrical
8 fire caused by a short at the wiring to the BEC
9 module in a Lincoln Town Car, when, in fact, it was
10 a fire that originated in a wall outlet behind a TV
11 about three feet from the car on the other side of
12 the wall from the garage.

13 Q. Was this on a consulting basis?

14 A. Yes.

15 Q. Okay. How did you reach the conclusion
16 that the fire actually originated in the house
17 rather than the automobile?

18 A. I had the house to look at and the car both
19 in that one in good -- in great condition. And the
20 investigator on the other side was a guy that used
21 to work for me.

22 Q. Okay. Who was that?

23 A. His name is [REDACTED]

24 Q. What was [REDACTED] conclusion?

25 A. He thought it was electrical, just inside

1 the vehicle on the passenger side.

2 Q. Okay. Do you know what happened to that
3 case?

4 A. It was settled for some small amount just
5 prior to going into the courtroom. I don't remember
6 what it was.

7 Q. You also have a [REDACTED] listed where
8 you were representing Chrysler.

9 A. Right.

10 Q. Do you recall that case?

11 A. Yeah. I represented Chrysler on that case.

12 Q. Okay.

13 A. No, I'm sorry. I represented the plaintiff
14 in that case.

15 Q. You represented the plaintiff in that case.

16 A. Yeah, I represented the plaintiff in that
17 case.

18 Q. Okay. Let's talk about that case for a
19 minute.

20 A. Yeah. That burnt a house down.

21 Q. Burned a house down. Similar to what we
22 have in this case.

23 MR. DAVIS: Object to the form of the
24 question.

25 [REDACTED]

1 Q. Is that correct?

2 A. I don't agree that the car burned the house
3 down in this one necessarily; but it was a case
4 where the Chrysler actually did burn the house down,
5 yes.

6 Q. What we've got in this case is a car being
7 burned up and a house being burned up. Correct?

8 A. We have them both burned, right.

9 Q. That's what you had in the Shirley Brown
10 case?

11 A. Yeah.

12 Q. Okay. Tell me what you had to look at in
13 that case.

14 A. I had a house still smoking when I got
15 there in fact, but --

16 Q. Okay.

17 A. Had a house burn down out in the country.
18 Car was still in position, no debris had been
19 removed. I got to do the full nine yards on that
20 case.

21 Q. And you were hired by the plaintiff in that
22 case?

23 A. I was hired by their insurance carrier
24 originally.

25 Q. And it's not unusual for the insurance

1 carrier to hire a cause and origin immediately after
2 the fire. Is that correct?

3 A. I've made a lot of money from insurance
4 companies doing that --

5 Q. And that's --

6 A. -- in my career.

7 Q. And that's exactly what Mr. Vickers did in
8 this case.

9 A. Yes, it is.

10 Q. Okay. Do you know Mr. Vickers?

11 A. Known him for over 20 years.

12 Q. Okay. Is he a good cause and origin
13 investigator?

14 A. He's a good man.

15 (Off the record.)

16 [REDACTED]
17 Q. Just before we broke, I asked you about Mr.
18 Vickers, and you said he was a good man. Is he a
19 good cause and origin investigator, is my question?

20 A. As far as I'm concerned, he's a very
21 competent cause and origin investigator.

22 Q. Okay.

23 A. [REDACTED] and I don't always agree, but I
24 respect [REDACTED]

25 Q. He said pretty much the same about you.

1 A. We've been friends a long time.

2 Q. Let's go back to [REDACTED] for a
3 minute. How did you determine that the fire in that
4 Chrysler originated in the wiring harness?

5 A. By doing a complete origin and cause
6 investigation and bringing it down right to that
7 point. I also -- after doing my origin and cause in
8 getting to that point, I also relied on witness
9 information and the history of the vehicle as well.

10 Q. Okay. Well, what led you to conclude it
11 was a wiring harness fire?

12 A. Well, all my burn patterns led straight out
13 of that area behind the glove box in the instrument
14 panel assembly of this Chrysler outward and upward
15 and into the wall of the house right adjacent to it
16 and into the attic overhead. And the fire spread
17 from there throughout the remainder of the
18 structure.

19 Q. What did Chrysler contend was the cause and
20 origin?

21 A. Well, they must have concluded what I did
22 because they paid off the whole thing.

23 Q. Do you know if they hired a cause and
24 origin investigator or not?

25 A. They had engineers. They had a lot of

1 people look at it. I don't know if they ever had a
2 C&O person look at it.

3 Q. Do you know what they concluded one way or
4 the other?

5 A. No.

6 Q. Okay.

7 A. I know they settled it.

8 Q. I believe --

9 A. I gave a deposition before they settled it,
10 though.

11 Q. I believe we've already discussed the
12 Hoffman case. You also testified live in that case.
13 Is that right?

14 A. I testified several times in [REDACTED] That
15 thing went over and over and over again.

16 Q. Okay. And the rest of the Ford Motor
17 Company cases listed on the second page -- pardon me
18 -- the third page of your deposition listing, were
19 any of those fires alleged to be electrical by the
20 plaintiff?

21 A. Bazzoni.

22 Q. Well, it's not on that page.

23 A. Which page are you on?

24 Q. I'm on the same page we were on with
25 [REDACTED]

1 A. Oh.

2 Q. -- which is the third page. For example,
3 on Farmers Insurance, you've got coolant fire
4 listed. As I understand it, that's your conclusion,
5 not necessarily what the plaintiff alleged.
6 Correct?

7 A. Right. They -- they alleged a gasoline
8 leak. I remember that one. That's a motor home
9 fire.

10 Q. Okay.

11 A. There's no other electrical on that page.

12 Q. Okay.

13 A. Staley we've already talked about.

14 Q. Okay. Plateau Energy?

15 A. Oh, yeah.

16 Q. Let's talk about that case for a second.

17 A. That one was an electrical fire, but it was
18 in a different set of circumstances than the
19 allegations.

20 Q. What were the allegations?

21 A. Allegation was it was a wiring harness that
22 became pinched behind the engine block on the
23 bulkhead, when, in fact, it was wiring in the same
24 area, but it was for a snow plow that had been put
25 on aftermarket.

1 Q. So you concluded it was aftermarket wiring
2 as opposed to a defect by Ford.

3 A. Right.

4 Q. Okay.

5 A. Must have. I -- that one went to trial
6 too.

7 Q. Okay. You also have a [REDACTED] listed. Do you
8 recall what the allegation was in the [REDACTED] case?

9 A. That was - [REDACTED] was a collision death
10 case, but I don't remember all the story on it.

11 Q. Okay. Didn't have anything to do with an
12 alleged electrical fire.

13 A. No.

14 Q. Bazzoni?

15 A. Yeah.

16 Q. What do you recall about that case?

17 A. Bazzoni was an alleged wiring harness fire
18 in the engine compartment of a car -- a Crown Vic,
19 in fact -- when, in fact, it turned out to be a fire
20 in a garage that burned out of the garage and the
21 house fell on the car.

22 Q. Okay. And how were you able to -- were you
23 hired on consulting basis for that one?

24 A. Yes, I was.

25 Q. Okay. And how were you able to reach that

1 conclusion?

2 A. The only -- the only way I could reach that
3 was the -- I did have the car to examine in that
4 one. I did not have the house, but we had very good
5 photographs -- numerous photographs, had a live
6 video made by a witness, the fire department,
7 eyewitnesses, and a number of things that -- that
8 added up; and -- and, in fact, some of them -- the
9 car wasn't even on fire and the house was on fire.

10 Q. And you base that on the testimony of the
11 eyewitnesses?

12 A. And the burn patterns on the car.

13 Q. Okay. And burn pattern -- and you did have
14 the car.

15 A. Yeah, I had the car. I didn't have the
16 house.

17 Q. So spoliation was not an issue in that
18 case.

19 A. No.

20 Q. Okay. Let's talk about your investigation
21 -- your consulting investigation in this case. If
22 you would --

23 A. Yes, sir.

24 Q. -- if you would walk me through what you
25 did in this case.

1 A. What I did in this case was review all the
2 materials forwarded to me by counsel.

3 Q. Let's talk about what materials you were
4 forwarded by counsel.

5 A. Okay. Three statements taken by a State
6 Farm Insurance Company representative from [REDACTED] and
7 [REDACTED] well, actually, two of them are Mr.
8 and [REDACTED] and one is with [REDACTED]

9 Q. Okay.

10 A. One dated December 7th, 1995; one dated
11 December 11th, 1995; and one dated -- another one
12 dated December 7th, 1995. Notice of deposition.
13 You already know about that.

14 Q. What is that next document?

15 A. Well, my next one -- I was going to put
16 them in order, but the next one I pulled out was my
17 report.

18 Q. Okay. Your two-page report?

19 A. Right.

20 Q. Okay.

21 A. That's the original. The next one I pulled
22 out is my billing sheet.

23 Q. Okay.

24 A. Then there's a letter to Mr. Davis saying
25 here are your photographs, send me some money.

1 Q. He's good about that.

2 A. No, actually, it just says here are your
3 photographs. Next one is a letter from Mr. Davis to
4 me, reference Leonard Bible and [REDACTED]
5 where he -- wherein he has forwarded me documents to
6 review, dated January 28, 1998.

7 Q. And the documents are?

8 A. Under the Bible -- in Bible: (a)
9 Plaintiffs' expert reports from James Vickers and
10 Rick -- Richard Kovarsky, and (b) photographs.
11 Under [REDACTED] you got (a) plaintiffs' expert reports
12 from James Vickers and Richard Kovarsky, (b)
13 photographs, (c) statements of [REDACTED]

14 Q. Okay.

15 A. The next item I have in the file is the
16 designation of plaintiffs experts. And near as I
17 can tell, there's only one expert and that's Jimmy
18 Vickers. And that's dated December 12th, 1997.

19 The next item I have is a report prepared
20 by Burgess O. Young, Ford Motor Company, dated March
21 27th, 1998. This was not considered in my opinion,
22 but it's in my file. And I don't know what we're
23 going for here, what I considered or --

24 Q. Well, let's just find out what you got in
25 your file.

1 A. Okay.

2 Q. But you didn't consider Young's report
3 from --

4 A. No.

5 Q. -- in your opinion.

6 A. No.

7 Q. Okay.

8 A. The next item is component location views.
9 This is part of a Ford manual on the 1993 Crown Vic
10 and Grand Marquis. I believe, if I remember
11 correctly, these were attached to Mr. Kovarsky's
12 report.

13 Q. Did you consider those documents?

14 A. No. I had seen them before. Next item is
15 a report dated December 8, 1997, from Pyro-Technical
16 Investigations, Incorporated. That's Mr. Kovarsky's
17 report, with photographs, or actually laser copies
18 of photographs.

19 The next are a set of photographs that I'm
20 not sure who they belong to, dated December 3rd,
21 1997. They may be Jimmy Vickers' photographs, but
22 I'm not positive about that. I -- I -- and they
23 could be Kovarsky's, but I don't see any dates --
24 yeah, I do too. Excuse me. These are photographs
25 made the same date as Mr. Kovarsky's, but they're

1 not in the same order. I'm assuming from the looks
2 of them, they're the same photographs, but sort of
3 like the ones you had a few minutes ago that had
4 been shuffled. I just can't make out whose they
5 are. They appear to be Kovarsky's, but I'm not
6 positive about that.

7 Q. All right.

8 A. They're dated the same time and they're the
9 same materials, but they're not in the same order.

10 MR. DAVIS: They would be Kovarsky's, but
11 they're just not a part of his report. So he just
12 took extra photos and apparently gave me a copy of
13 them.

14 (Off the record.)

15 A. Next item is a fire cause determination
16 prepared by James Vickers with attachments, and then
17 there are laser copies of photographs taken by Mr.
18 Vickers.

19

20 Q. All right.

21 A. I've -- I've also -- I thought I had also
22 received hard copies on this from Mr. Vickers, but I
23 -- maybe it was on the other file. And that's it.

24 Q. All right. Now, those are the informations
25 that you were provided with in doing your consulting

1 report?

2 A. That's the file information, but I have
3 also examined the vehicle and the structure.

4 Q. All right. Well, if you would, if you'd
5 take me through your examination and how you derived
6 at the conclusion you reached in your report on a
7 step-by-step basis if you could, sir.

8 A. Well, first thing I did, of course, is
9 after -- after receiving the materials from Mr.
10 Davis is I read the statements and reviewed the
11 other expert reports that were forwarded to me and
12 considered that information. Then afterward, I came
13 to Jackson area and I examined the vehicle at
14 Copart, and then traveled up near Meridian and
15 looked at the structure, what was remaining of it.

16 Q. Okay. And after you did those things, how
17 did you come to the conclusion that you reached in
18 your report of February 16, 1998?

19 A. It was in that considering all the
20 information and evidence available to me and
21 considering the amount of damage to the vehicle, the
22 condition of it, the exposure of the structure and
23 all that, my basic and final conclusion was that I
24 couldn't make a determination of exact cause and
25 origin.

1 Q. So you don't necessarily disagree with Mr.
2 Vickers. You just say you can't reach the same
3 conclusion by virtue of the span of time?

4 A. Span of time and the failure to protect the
5 vehicle and -- from the elements and provide me with
6 the same ability to examine it fully as he had. I
7 can't do it. And I don't necessarily disagree with
8 him, and I can't agree with him because I don't
9 know.

10 Q. Okay. So you're not able to reach a
11 conclusion one way or another.

12 A. Well, that's what I said.

13 Q. Okay.

14 A. I cannot. I'm unable to reach a factual
15 determination.

16 Q. It's my understanding that you were hired
17 by Ford on July 16, 1997? Is that correct?

18 A. I believe that's right. Whatever that
19 letter is, it was just prior to that.

20 Q. And you actually conducted your inspection
21 on February 5th, 1998. Is that right?

22 A. 4th or 5th, whatever the photographs say.

23 Q. Why did you delay that six-month period in
24 making your examination?

25 A. I haven't a clue.

1 Q. Do you know when Ford was first notified of
2 this fire?

3 A. No.

4 Q. Okay. If I understand your testimony,
5 would it be fair to say that what Ford should have
6 done was immediately hire a cause and origin
7 investigator to come out and investigate the scene
8 and the automobile after being notified of the fire?

9 A. Not necessarily.

10 Q. Why not?

11 A. Well, just because you're notified of a
12 fire doesn't mean that you have a responsibility
13 there. I'm sure they were awaiting some kind of
14 information as to what the allegations were or what
15 the proof was or what -- who's saying what or
16 anything about it. I just don't know the answer to
17 that because I'm not a Ford employee.

18 Q. If Ford was notified on November 22nd,
19 1996, that State Farm's investigation considered the
20 fire to be electrical in origin and making a demand
21 on Ford for \$140,000, should that have provided Ford
22 with some information to cause -- well, strike that.
23 Should that have provided Ford with sufficient
24 information, in your estimation, to hire a cause and
25 origin investigator rather than waiting until

1 February of 1998 to do that?

2 MR. DAVIS: Object to the form of the
3 question. That is a question for Ford Motor
4 Company, not necessarily for Mr. Newell.

5 [REDACTED]
6 Q. You can answer it.

7 A. I can't answer the question because, number
8 one, I don't know all the inner workings of Ford. I
9 don't know all their policy. I'm an outside
10 independent investigator contacted by them when
11 needed; and I can't speak for them, so I can't
12 answer that.

13 Q. Okay. But a delay of time, in your
14 estimation, caused you to conclude that you can't
15 reach a conclusion one way or the other on the cause
16 and origin of the fire?

17 A. No.

18 Q. That's not correct?

19 A. That's not -- that's not what I said.

20 Q. All right.

21 A. What I said was the failure to protect the
22 evidence and -- i.e., the car and the house -- was
23 just as bad, if not worse. The car was in as worse
24 condition as I've ever seen a burned automobile to
25 be stored in a salvage yard. It was covered in mud.

1 It was sitting in a water hole. It's burned all to
2 pieces, had no tarp on it and no protection
3 whatsoever; and when it was hauled to me, I couldn't
4 tell hardly one end of it from the other it was in
5 such bad shape.

6 Q. All right. And do you know if that was the
7 condition of the automobile in November of '96 when
8 Ford was first notified of this fire?

9 A. No, I don't.

10 Q. You say you examined the statements of the
11 Billows as part of your investigation? Is that
12 right?

13 A. Yes, I did.

14 [REDACTED] Let's mark this as the
15 next exhibit.

16 (Exhibit No. 3 marked.)

17 [REDACTED]
18 Q. Let me hand you what's been marked as
19 Exhibit No. 3, which is a statement dated -- by [REDACTED]
20 and [REDACTED] dated December 11, 1995 --

21 A. Right.

22 Q. -- and ask you a couple of questions about
23 that. Is it a fair statement -- well, let me ask
24 you this: Do you recall reading that statement?

25 A. Yeah, I read it. I read all three of them.

1 Q. Okay. Is it a fair statement that the
2 [REDACTED] stated in their recorded statement that the
3 fire was coming from the automobile and nowhere
4 else?

5 A. That's right.

6 Q. And they said it was on the left-hand side
7 of the front tire?

8 A. That's what they said.

9 Q. Okay. And that they testified that there
10 was nothing on the lawn mower?

11 A. I'll have to read that. I don't remember
12 the lawn mower part. That was that later statement,
13 I believe.

14 Q. Well, actually, it's on the second page of
15 this statement. Down towards the bottom, it says --

16 A. Oh, yeah. Yeah, yeah. Yeah. That's
17 right.

18 Q. Do you have any reason to disbelieve
19 anything they've said in this statement?

20 A. No. I've never talked to the people. I
21 have no reason to disbelieve it.

22 Q. All right. On the third page of the
23 statement, [REDACTED] gives a fairly lengthy
24 statement about what he saw; and --

25 A. Yeah.

1 Q. -- he said he saw a glow coming from
2 underneath the fender wheel.

3 A. I think he meant the fender well.

4 Q. Fender well. I think --

5 A. Yeah.

6 Q. -- you're right.

7 A. Yeah.

8 Q. And then he realized that the fire was up
9 in the engine compartment of the car.

10 A. Right.

11 Q. Okay. Do you have any reason to disbelieve
12 that?

13 A. No.

14 Q. Okay. On page 4, [REDACTED] stated that
15 "When we were in the front of the car, we could tell
16 on both sides of the car that it was only confined
17 to one corner at that time," then he says, "on the
18 left hand side." Do you have any reason to
19 disbelieve that?

20 A. Wait a minute. Where we at?

21 Q. We're on page 4, the second A. "When we
22 were on -- when we were in the front of the car, we
23 could tell on both sides of the car that it was only
24 confined to one corner at that time," and then it
25 goes on to say, "on the left hand side."

1 A. Well, I can't necessarily go along with
2 that because I've burned too many cars and -- and,
3 you know, I'm -- I'm not a mind reader, but I know
4 we're dealing with lay people who are not fire
5 people. And when a car is on fire in the engine
6 compartment, you -- you may see it in one spot, but
7 there may be a lot of fire in another spot in the
8 engine compartment you don't necessarily see unless
9 you raise that hood, and I mean get that hood up
10 there. But --

11 Q. But that's what they --

12 A. -- you know --

13 Q. That's what the eyewitness saw.

14 A. That's what he saw. That's what they saw.

15 Q. Is there any reason to believe that this
16 fire originated -- based upon the statements of the
17 Billows, is there any reason to believe that the
18 fire originated anywhere other than somewhere under
19 the hood of the car?

20 A. Based on their statement, there is no other
21 reason -- no reason to believe otherwise.

22 Q. Okay. Did you find any physical evidence
23 or any photographs to support a conclusion that the
24 fire originated somewhere other than the hood of the
25 car?

1 A. No, I can't.

2 Q. Okay.

3 A. I couldn't.

4 Q. Did you in your examination of the physical
5 evidence and your reviews of the reports of Mr.
6 Kovarsky and Mr. Vickers find any evidence
7 supporting their conclusion that the fire was
8 electrical in origin and that it originated under
9 the hood of the car in the left-hand front corner of
10 the automobile?

11 A. No. I didn't find any evidence to support
12 that either, not in the parts and evidence that Jim
13 -- Mr. Vickers has in his possession that I
14 examined. I don't see that.

15 Q. Did you find any evidence to contradict
16 their conclusion that that's where the fire
17 originated?

18 A. No. I haven't found evidence to contradict
19 their conclusion based on that. What I did see was
20 the -- oh, shucks. I don't want to get these cars
21 mixed up. No, I can't tell one way or another --

22 Q. Let me tell you --

23 A. -- based on this car.

24 Q. -- you wouldn't be the first one to get
25 them mixed up. I'm sorry. I interrupted you.

1 A. No, that's all right. Considering the
2 amount of damage to the car, I couldn't make a
3 determination, period; so I can't agree or disagree
4 with them on that. But in examining the parts
5 removed by Mr. Vickers and in his possession when I
6 looked at them out there, I found nothing wrong with
7 the parts that would cause the fire.

8 Q. Is it correct to say that you would agree
9 that an automobile that had been sitting for 12
10 hours where a fire originated under the hood must
11 have been of an electrical origin?

12 A. If that's the case, that's true.

13 Q. Well, that's not quite my question. Would
14 there be an alternative basis for the fire if it
15 originated under the hood of the automobile --

16 A. I --

17 Q. -- after it had been sitting for 12 hours?

18 A. Well, only in that it could have been set
19 on fire, but I don't see any evidence of that here.
20 With the containers that -- I don't know what else
21 was in that garage other than what's in the
22 photographs and what I saw out there. Based on what
23 I know, I can't tell you where the fire started. If
24 there's nothing involved but the car after 12 hours,
25 nothing else, then you only have one energy source

1 and that's the electrical circuitry in some way.

2 Q. Okay. And so if the [REDACTED] are telling
3 the truth and that's where the fire originated from
4 and nothing else was burning when they examined it,
5 it must have been of an electrical origin.

6 A. If -- all things considered, it was -- it
7 was probably electrical. Now, the next question is:
8 What other part -- equipment is in that car? Is it
9 all factory vehicular or is there any aftermarket,
10 or is there anything that's been done to the car to
11 change that? It's not necessarily a defect that
12 causes an electrical problem.

13 Q. Did you find anything to indicate that
14 there was any aftermarketing electrical equipment
15 installed in the vehicle that could have caused this
16 fire?

17 A. How could I? There was no way. This car
18 was too far gone.

19 Q. So the answer is no?

20 A. The answer is no.

21 Q. Okay. So if I understand your testimony,
22 then, assuming the [REDACTED] are telling the truth
23 that the fire was electrical in origin, that's the
24 most likely cause of the fire.

25 MR. DAVIS: Object to the form of the

1 question.

2

3 Q. Is that correct?

4 A. Assume -- I don't -- I don't like the word
5 "assume," but I won't argue that point with you.

6 Q. Okay.

7 A. All things considered, if there's nothing
8 else involved and everything is as the [REDACTED] say,
9 then it's electrical. That's right.

10 Q. All right. In the December 11, 1995,
11 statement of [REDACTED]
12 states --

13 A. Which one of the December 11s?

14 Q. The one that's marked as Exhibit No. --

15 A. -- 2 -- 3.

16 Q. -- 3.

17 A. Three. Okay.

18 Q. -- [REDACTED] states, I believe, that he
19 saw dripping plastic onto the tire. Correct?

20 A. Yes, he said it was onto the tire.

21 Q. Okay.

22 A. Well, that's not all he said. I want to be
23 fair to his statement.

24 Q. Sure. Let's do that.

25 A. And when he went out the door, which is on

1 the same side as the left front tire of the car,
2 "... the very first thing I saw was something
3 dripping down and on fire and there was a puddle of
4 material that was on fire beside the left front
5 tire." And that probably has bothered me more than
6 anything in the statement.

7 Q. And, in fact, he says it's plastic material
8 dripping down. Correct?

9 A. "Then I saw a --" wait a minute. I lost my
10 -- I lost my place. Let me go back and start it
11 again. "... the very first thing I saw was
12 something dripping down and on fire and there was a
13 puddle of material that was on fire beside the left
14 front tire. That's the first thing I saw." Now,
15 the way he's describing that, it sounds like two
16 separate fires he's talk -- he sees there, is the
17 way I read that: something dripping on fire and
18 then there's a puddle of material that's on fire.
19 And the reason it bothers me is because my
20 experience with melting plastic and fender wells is
21 as soon as they hit cold -- cold concrete, they
22 almost immediately go out because they cool so
23 quickly.

24 Q. All right. It's correct to say that at
25 least what Mr. Billows said he saw was dripping

1 plastic.

2 A. He did see -- evidently, he saw that.

3 Q. Now, in Mr. --

4 A. That's what he said.

5 Q. In Mr. Kovarsky's report, he states that:
6 Given the location of the air suspension compressor
7 motor, it's well protected by casual contact that
8 might occur during normal maintenance activities
9 within the engine compartment. He also testified or
10 in his report states that it is surrounded by
11 plastic. Is that accurate, first of all?

12 A. Let's go back to the first part of his
13 statement there. What was it he said, now? And
14 where are we?

15 Q. He said: Given the location of the air
16 suspension compressor motor, it is well protected
17 from casual contact which might occur during normal
18 maintenance activities within the engine
19 compartment. The location of this unit actually
20 requires a significant amount of deliberate action
21 to uncover and gain access to the motor. Is that
22 correct?

23 A. I don't have a problem with that.

24 Q. Okay. Is it correct to say that the --
25 that that area surrounding that pump is all plastic?

1 A. No, it's not correct to say that, but there
2 is a lot of plastic around there.

3 Q. Have you examined an exemplar of the
4 vehicle?

5 A. I've seen lots of them.

6 Q. Okay.

7 A. And there is -- it's not all plastic, but
8 you're in an area of probably more plastic than
9 anyplace in that engine compartment.

10 Q. Okay.

11 A. That, and the air handling system and --
12 and lots of things in that area.

13 Q. All right. Have you examined Mr.
14 Kovarsky's report?

15 A. Yes, I have.

16 Q. All right. Mr. Kovarsky points to
17 photographs which he lists as photograph No. 6, I
18 believe.

19 A. Yeah. Somebody mounted mine upside down,
20 but I have it.

21 Q. We probably did that if we sent it to --
22 to --

23 A. Is that extra?

24 Q. Yeah, we probably charged some extra for
25 that. Where he says he found -- he found melted and

1 beaded copper at the end of one of the conductors
2 and that that was indicative of electrical
3 short-circuiting involving this conductor.

4 A. Are we talking about photograph 6? Is that
5 what we're talking about?

6 Q. That's what he says.

7 A. Okay.

8 Q. Now, do you agree or disagree with that
9 conclusion?

10 A. I disagree.

11 Q. All right. And why is that?

12 A. What you're looking at right there is -- I
13 looked at that conductor too, and my experience --
14 I'm not an electrical engineer, but I've looked at a
15 lot of electrical wiring in my life; and that
16 stretched piece of wire says it was stretching while
17 it was melting. It doesn't mean it necessarily
18 shorted.

19 Q. Could it mean it was shorted?

20 A. Well, what comes first, the chicken or the
21 egg? It could have. But in this photograph, it
22 shows stretching effect, that the wire had tension
23 on it during a melting sequence.

24 Q. So you're not denying that it could have
25 shorted.

1 A. Yeah. Well, any wire in there could have
2 shorted, but they -- they didn't show any evidence
3 of it.

4 Q. Are you saying that there's no physical
5 evidence in photograph 6 of Kovarsky's report that
6 indicates a short-circuiting?

7 A. I don't see it.

8 Q. Okay. And you say you're not --

9 A. And evidently [REDACTED] didn't see it
10 either because --

11 Q. Well, you -- you say you're not an
12 electrical engineer. Right?

13 A. No, sir.

14 Q. Do you know if Mr. Kovarsky is?

15 A. Do I know who he is?

16 Q. Do you know if Mr. Kovarsky is an
17 electrical engineer?

18 A. Well, that's what his paperwork says.

19 Q. So he is an electrical engineer.

20 A. I -- I guess.

21 Q. Do you have any reason to doubt that?

22 A. No. I don't know him.

23 Q. Did you take a photograph of that same
24 item?

25 A. I'm not sure.

1 Q. Let me give you your photographs and see if
2 you can point that out to me.

3 A. (Reviewed photographs.) I don't seem to
4 have one from close-up. I think I have the same
5 piece, but I don't think I took a close-up one of
6 it. I know that photograph is that. That's the
7 same one. And I believe this was it right there.

8 Q. What you're referring to is photograph
9 No. 55. Is that correct?

10 A. Right. I remember seeing that.

11 Q. And it's your contention your photograph
12 No. 55 is a photo of the same piece of copper wiring
13 as figure No. 6 in Kovarsky's report?

14 A. Yeah. He's got a real -- a magnified
15 close-up of one end of the wire and I have all the
16 wire laying there. I didn't magnify it because I
17 just didn't see a reason to.

18 Q. All right. So you disagree with that
19 conclusion of Mr. Kovarsky.

20 A. Yes.

21 Q. Okay. Mr. Kovarsky also concludes that the
22 left front cast-aluminum wheel had melted during the
23 course of the fire and there was partial melting at
24 the right front of the vehicle, and he references
25 figures 31 and 32 in his report.

1 A. Okay. Okay.

2 Q. Would you agree with that conclusion?

3 A. Yeah, I don't have a problem with that.

4 Q. Okay. Would that be a directional
5 indicator of the fire?

6 A. Could be a lot of things, not necessarily a
7 directional indicator. It could be what -- the left
8 front could be in a trap corner where the heat
9 progression was much higher versus ventilation on
10 the other side. It could be water was put on the
11 other side before it was put on the left side.
12 Could be a lot of things. I don't -- you can't --

13 Q. Well, let's go through those.

14 A. -- put that a hundred percent into it.

15 Q. Let's go through those. The [REDACTED]
16 testified that they poured water on the left side
17 not the right side. Correct?

18 A. That's correct.

19 Q. So that would not be consistent, would it?

20 A. How much water? I only read a couple of
21 pitchers of water.

22 Q. Well, it would not be consistent with
23 water, if I understand your testimony.

24 A. And fire fighting is what I said.

25 Q. Well, actually you testified water, but you

1 want to change that to fire fighting?

2 A. Well, putting water on it by fire fighters
3 is what I'm getting at.

4 Q. Okay.

5 A. I -- I knew Billows put water on it. I
6 read that.

7 Q. All right. Now, you say that it is not
8 necessarily a directional indicator from where the
9 fire originated. Could it be --

10 A. That's correct.

11 Q. Is that one of the things you would look at
12 in making a determination as to whether that's a
13 directional indicator?

14 A. It would be if this car was sitting out in
15 the open, yes. But when the car is in a carport or
16 in a garage, it can change it drastically. You have
17 to be very careful with that.

18 Q. Did you examine the layout done by Mr.
19 Vickers?

20 A. Yes, I've seen his sketch.

21 Q. Okay. Is there any indication that the
22 left front corner was in a closed-in area as opposed
23 to the right front corner?

24 A. Yes, there was.

25 Q. Okay. And what is the space differential

1 between those two?

2 A. Well, it doesn't matter. I don't know.
3 The problem is that the left front corner was up in
4 the corner where the utility room and the door into
5 the house cornered, and that's a trapped area.
6 Plus, when the house burned down, it's applying more
7 heat to that side of the car than it was to the
8 opposite side of the car because that's the side the
9 house was on. The other side is nothing but open
10 carport area, so you don't have the fuel load on the
11 opposite side. I expected this left front wheel to
12 be more damaged than the right front wheel.

13 Q. Well, wasn't there a gas can right next to
14 the right front tire?

15 A. Yeah, but it never turned over. It was
16 sitting upright the whole time. Didn't have
17 anything to do with it.

18 Q. Well, was there gasoline in it?

19 A. Well, I don't know that, but it wouldn't
20 have mattered.

21 Q. It wouldn't have mattered to you?

22 A. No, it wouldn't have mattered, because
23 unless you turn the can over, the only thing you're
24 going to get from that can is vapor ignition coming
25 out of the top of it.

1 Q. Mr. Kovarsky concludes that a pump control
2 unit for the anti-lock brake was located on the top
3 side of the -- on the top of the left side frame
4 rail near the left front corner of the engine.

5 A. Uh-huh.

6 Q. Says an examination of this unit found
7 evidence of melted aluminum with the heaviest
8 melting of aluminum occurring on the left side of
9 the pump, and he references figures 38 and 39. Do
10 you agree or disagree with that conclusion?

11 A. Yeah, I -- I agree that it was mounted
12 there. I agree there's melted aluminum there. Yes,
13 I --

14 Q. Okay.

15 A. -- I think he's correct.

16 Q. Would that be a directional indicator of
17 the fire?

18 A. No, it won't.

19 Q. Why not?

20 A. Directly above this unit is a power
21 steering reservoir, and directly behind this unit is
22 a master cylinder reservoir, both of which contain a
23 good quantity of combustible liquid. And when they
24 start burning -- in particular this power steering
25 reservoir. It's holding about a quart of power

1 steering fluid -- this stuff runs all over that
2 place. And it's probably all over this pump,
3 because I've seen it get on them before during a
4 fire. And once that oil starts burning -- this is
5 cast aluminum you're looking at, and it'll melt at
6 about 750 degrees and start distorting. So you
7 can't put a lot of weight on this one item here. Up
8 higher, now, on the engine block, you can -- you can
9 use that aluminum cast a lot better.

10 Q. So you would completely disregard that as a
11 directional indicator.

12 A. I wouldn't completely disregard it. I
13 wouldn't say, though, that it's the Bible, that it
14 -- this is the only piece of evidence.

15 Q. That's right. That's one piece of evidence
16 you would look at. Correct?

17 A. Right. But you've got to remember when
18 you're looking at these cars what other fuel load is
19 there. You can't just say, This is it. And I see
20 no -- I don't think he even considered the fact
21 we've got a quart of power steering fluid dumped in
22 this area, right on -- right down -- it goes right
23 down onto this and onto the frame rail.

24 Q. So if I understand what you're telling me,
25 that is, one of the things you would look at is a

1 directional indicator, but it's not the only thing;
2 and you need to take into consideration the power
3 steering fluid as well, which is --

4 A. The fuel load around it. That's what I'm
5 getting at.

6 Q. Okay.

7 A. Yes.

8 Q. Okay. Mr. Kovarsky also finds evidence of
9 short-circuiting in figures 17 and 18.

10 A. Right.

11 Q. Do you agree that that -- that those
12 photographs contain evidence of short-circuiting?

13 A. Yes and no.

14 Q. Okay. Let's talk about the yes, first.

15 A. All right. The yes is -- is possible, but
16 I can't disagree that it happened. And that's in --
17 in photograph -- figure 17, as you're looking at the
18 photograph, it'll be the upper left arrow.

19 Q. Uh-huh.

20 A. The one on the right I don't think has
21 anything to do with it. That's -- that's a ball,
22 simple ball of melted copper. And figure 18 is, I
23 think, the same wiring but from a different angle,
24 best I can tell.

25 Q. I think you're right.

1 A. And I agree with the one on the right could
2 be. Not necessarily caused the fire, but it very
3 well could be a short.

4 Q. Okay.

5 A. The one on the left, I think, is a
6 different view of that -- of another ball adjacent
7 to the one he had in figure 17.

8 Q. Okay.

9 A. But the balls don't mean anything to me
10 except this small strand wire got hot enough to
11 melt.

12 Q. Let's back up a little bit. I want to make
13 sure I understand what you're telling me. Mr.
14 Kovarsky concludes that that is evidence of
15 short-circuiting; and if I understand what you're
16 telling me, you say it may be evidence of
17 short-circuiting.

18 A. It very well could be, yeah.

19 Q. And that's because it is melted --

20 A. Well, it's welded.

21 Q. -- copper.

22 A. It appears to be welded together. Just
23 being melted don't tell me.

24 Q. Okay.

25 A. No. Melting -- melting just means that the

1 copper reached its melting point --

2 Q. Okay.

3 A. -- for one reason or another.

4 Q. And you said that that's not necessarily
5 what caused the fire.

6 A. That's correct. What comes first, the
7 chicken or the egg?

8 Q. Okay. So you're not disputing that it may
9 have caused the fire, you're just saying it didn't
10 necessarily cause the fire.

11 A. Right. That's what I say. I don't know.

12 Q. Mr. Kovarsky concludes that the fact that
13 there was short-circuiting on the wires by the air
14 suspension compressor indicates that the fire was on
15 the left side of the vehicle and progressed to the
16 right side. Do you agree or disagree with that
17 conclusion?

18 A. I don't -- without being able to see it in
19 complete detail, I can't strictly answer the
20 question. But just because there's shorting on the
21 left don't mean the fire started on the left.

22 Q. Okay. May mean that, but not necessarily.

23 A. It could mean it, but it don't necessarily
24 mean it, no.

25 Q. Okay. Do you agree that the electrical

1 schematics for the vehicle indicated that there is a
2 constantly hot feed to the compressor motor
3 solenoid?

4 A. I -- I don't understand the schematics well
5 enough to answer that question.

6 Q. Okay. So you don't know whether or not
7 that was energized or not?

8 A. I've read the description; but to read the
9 schematics, they're a lot more difficult.

10 Q. Do you believe --

11 A. I would defer that to -- to an engineer.

12 Q. You don't know if it was energized or not,
13 one way or --

14 A. No, I don't.

15 Q. -- another. Okay. Mr. Kovarsky concludes
16 that it's his opinion that the most probable cause
17 of the short-circuiting which caused the fire was
18 damage to the wiring insulation that occurred during
19 the manufacturing of the vehicle. Do you agree or
20 disagree with that?

21 A. I disagree.

22 Q. And why is that?

23 A. Because it's probable the dog would have
24 caught the rabbit if he hadn't stopped to rest too,
25 but it don't mean that's what happened.

1 Probabilities in fire investigations and
2 possibilities are the worst things you can have.
3 Either it is; it isn't; or I don't know. That's the
4 only true facts in fire investigations. Now, he's
5 an electrical engineer and he can say that if he
6 wants to, I guess; but just because there's a short,
7 it doesn't mean it caused the fire.

8 Q. All right. Let's get back to my question.
9 The question is: Do you agree or disagree that
10 that's the most probable cause of the
11 short-circuiting which caused the fire?

12 MR. DAVIS: Object to the form --

13 A. I --

14

15 Q. Or do you not know?

16 MR. DAVIS: Object to the form of the
17 question.

18 A. I don't know.

19

20 Q. Okay. That's fine. Do you have any reason
21 to disagree with Mr. Kovarsky's conclusion that the
22 fire was accidental?

23 A. No, I don't have any reason to disagree
24 with that statement.

25 Q. Okay.

1 A. I don't know, but I don't have a reason to
2 disagree with it.

3 Q. Well, in your examination of the
4 photographs taken by Mr. Vickers the day following
5 the fire and your examination of the fire scene
6 itself, was there anything that would lead you to
7 believe that the fire was anything other than
8 accidental?

9 A. I don't know, because had I had the vehicle
10 in the same condition as Mr. Vickers had it, I could
11 probably say no, there was no evidence of arson at
12 all; but I can't answer that question because I
13 didn't have that. And Jimmy and I both have looked
14 at vehicles that have been set on fire in the hood
15 before. I think he's very competent; but I don't
16 see the evidence, and I wasn't there and I didn't
17 get to see that.

18 Q. Okay. Let's talk about Mr. Vickers' report
19 for just a minute.

20 A. We didn't identify this, did we?

21 Q. No. That's all right.

22 A. Okay. I've been known to run off with
23 stuff.

24 Q. Are you familiar with the term "blueing"?

25 A. Blueing?

1 Q. Blueing.

2 A. Oh, yeah.

3 Q. And that's b-l-u-i-n-g? Is that right? Or
4 b-l-u-e? You tell me.

5 A. You can spell it either way, I guess.

6 Q. How do you spell it?

7 A. B-l-u-e-i-n-g.

8 Q. Okay.

9 A. And -- I don't know that it matters how you
10 spell it.

11 Q. What does that mean?

12 A. Blueing is a discoloration that occurs to
13 metal. It's a change in color due to heat
14 application.

15 Q. And what is it indicative of?

16 A. Usually, it's indicative of either one of
17 two things or both: either a very intense high
18 temperature fire or a long-sustained high
19 temperature fire. You can get it sometimes on types
20 of metal from a quick hot fire, but usually in
21 automobiles it's consistent with a -- a continued
22 sustained temperature.

23 Q. Photograph No. 18 of Mr. Vickers' report is
24 a photograph, if I understand it, of the left front
25 corner?

1 A. Hold on a minute because I have copies
2 here. They're numbered, though. These are. Yes.
3 My color is better than yours.

4 Q. Let's make sure we're looking at the same
5 thing, because I think we've got them upside down,
6 actually.

7 A. No, I think they're on there wrong.

8 Q. Well, mine are on here right.

9 A. Yeah, these are wrong. Why don't I just
10 use the real photograph. Well, I can look at yours,
11 either one.

12 Q. Looking --

13 MR. DAVIS: The real photograph is not the
14 same.

15 A. No, they're not.

16 [REDACTED]
17 Q. Let's make sure we're talking about the
18 same thing. We are looking at photograph No. 18 in
19 Mr. Vickers' report. Correct?

20 A. If these stayed in the report, that's
21 correct; but they're not numbered to -- wait a
22 minute. Here's the problem. Here's where the
23 problem is. Somebody has taken black and whites and
24 tried to put photographs over them, and I do that in
25 my office. I know how that works.

- 1 Q. All right.
- 2 A. Let's go with what you got, though.
- 3 Q. Let's go with what we got here. And we are
4 looking at Mr. Vickers' original report.
- 5 A. Uh-huh.
- 6 Q. And we're on page 15 of the report. We're
7 looking at photographs No. 17 and 18. Correct?
- 8 A. That's right.
- 9 Q. All right. Photograph No. 18: Is it
10 correct to say that is a photograph of the left
11 front corner of the vehicle?
- 12 A. Left front fender, that's right --
- 13 Q. All right.
- 14 A. -- and engine compartment.
- 15 Q. And engine compartment. Photograph No. 17
16 is the right front --
- 17 A. Yes.
- 18 Q. -- fender. What is the orange on
19 photograph No. 17?
- 20 A. It's called rust.
- 21 Q. That's rust?
- 22 A. Yeah.
- 23 Q. Okay. And what does that indicate in terms
24 of fire?
- 25 A. Usually that the fire intensity is on the

1 opposite side of that fender well. Rust shows up on
2 the opposite side -- on an automobile it shows up
3 primarily on the opposite side of where the heat
4 application is.

5 Q. Okay. Is that a directional indicator?

6 A. Yes, it is.

7 Q. And you would consider that an indicator
8 that the heat was more intense on the opposite side?

9 A. In the -- in the engine compartment at the
10 rear of that fender well near the bulkhead
11 assembly --

12 Q. Okay.

13 A. -- or, as commonly called, the fire wall.

14 Q. And photograph No. 18, would that be
15 considered a blueing of that fender?

16 A. No.

17 Q. Okay. And why not?

18 A. Well, it's too blotchy. The blueing is --
19 is usually -- looks like -- see if I know how to
20 describe it. May I look at these photographs?

21 There --

22 Q. Sure.

23 A. -- may be one. Blueing is usually very
24 shiny and reflective of light. And what it has done
25 is tempered the metal and burned all the primer and

1 all the paint off, and it's actually turned the
2 metal into a actual blue color. This is a -- a
3 serious heat application where the tire burned off,
4 but this car -- you very seldom get blueing on this
5 type of car because the hood is aluminum and it --
6 it disintegrates rather quickly in a fire and
7 allows --

8 Q. That's all.

9 A. -- ventilation; whereas, if a steel hood
10 were on there, it would capture and keep the heat
11 constant coming up in there and you'd get a blueing
12 effect more readily.

13 Q. Okay. Mr. Vickers found in his report and
14 he states that the heavier melting to the aluminum
15 window frames around the eastern end suggested the
16 fire was most intense here, substantiating the
17 origin of the fire as being near the eastern end of
18 the structure. Would you agree or disagree with
19 that conclusion?

20 A. Well, I can't disagree with him. According
21 to the fuel load -- and I didn't get to see the
22 structure, but -- I'm not even sure what direction
23 we're talking about now, but I --

24 Q. All right.

25 A. That is an indicator of fire -- fire

1 progression --

2 Q. Okay.

3 A. -- is what it is.

4 Q. Mr. Vickers also finds that there was clear
5 evidence that the fire originated within the motor
6 compartment of the Mercury parked in the garage.
7 Wiring samples were taken along the left side of the
8 motor compartment, as well as a small motor which
9 had burned loose and fallen to the concrete under
10 the left side. Do you believe that the fact that a
11 motor would have burned off and fallen would have
12 been an indicator as to the origin of the fire?

13 A. No.

14 Q. Place of origin?

15 MR. DAVIS: Object to the form of the
16 question.

17 A. No, that's -- that's not an indicator as to
18 the origin when you have a complete vehicle burn,
19 because his own photographs -- I think when you look
20 through them, you'll see a lot of parts laying on
21 the floor.

22

23 Q. Okay.

24 A. And there's a lot -- many things turn loose
25 during a fire and fall out of a car.

1 Q. Now, if I understand your testimony
2 throughout this deposition, you don't disagree with
3 Mr. Vickers' conclusion that the fire originated in
4 the left front corner of the automobile, you just
5 can't reach a conclusion one way or the other.

6 A. I -- I can't reach a final determination,
7 no.

8 Q. Okay.

9 A. But I did not -- I -- I don't want to -- if
10 we go into trial in this thing, I don't want you to
11 say I didn't answer that question. I want to make
12 it clear that I not only can't, but I -- the
13 evidence that he has, I didn't see any evidence that
14 that's what started the fire. I just don't know
15 what started the fire.

16 Q. Have you seen any evidence that will lead
17 you to believe that the fire originated somewhere --
18 other than the left front corner of the automobile?

19 A. I -- I can't answer the question even,
20 because the condition of the vehicle, I can't even
21 tell you which corner it started in.

22 Q. Well, that's not my question exactly.

23 A. Well, I know what your question was.

24 Q. Okay. Well, I'd like an answer to my
25 question.

1 A. Your question is: Do I see anything that
2 indicates it started anywhere other than the left
3 front corner.

4 Q. Right. And what's the answer to that
5 question?

6 A. The answer is I don't know. And the reason
7 the answer is "I don't know" is I don't where it
8 started because I don't know -- have enough evidence
9 to say what corner it started in.

10 Q. You still haven't answered my question.
11 And I'm not trying to argue with you.

12 A. I know. I don't want to back --

13 Q. Well, you -- you and I have both --

14 A. -- myself in a corner either.

15 Q. You and I have done this both a number of
16 times. My question is -- is this: In your
17 examination of all the evidence, including Vickers'
18 report, Kovarsky's report, photographs taken by
19 yourself, photographs taken by Vickers, photographs
20 taken by Kovarsky, your review of the statements of
21 the Billows, did you find anything to indicate --
22 any evidence to indicate that the fire originated
23 somewhere other than the engine compartment of the
24 automobile on the left front corner?

25 A. No, but I also didn't find any evidence it

1 started anywhere else either. I don't know where
2 it started.

3 Q. Okay.

4 [REDACTED] Let me have just a minute.
5 (Off the record.)

6 [REDACTED], that's all the
7 questions we have for you. Appreciate your time.

8 A. I'll read, please.

9 MR. DAVIS: I may have a few questions.

10 EXAMINATION

11 BY MR. DAVIS:

12 Q. All right. [REDACTED] you reviewed the
13 report of James Vickers?

14 A. Yes.

15 Q. Okay. And in Mr. Vickers' report, in the
16 table of contents, he listed that there was an
17 electrical engineer's report on page 48.

18 A. Well, I got to find the table of contents.
19 Oh, I'm looking -- I'm sorry, That's Mr. Kovarsky's
20 report. Page 48?

21 Q. Yes, sir.

22 A. Yes. That's [REDACTED].

23 Q. Did you --

24 A. -- Ph.D.

25 Q. Did you review [REDACTED] report?

1 A. Yes.

2 Q. Do you know Mr. Owens?

3 A. Yes, I do.

4 Q. And did you notice in the conclusion of [REDACTED]
5 [REDACTED] that he says, "After a close inspection of
6 the burned vehicle and samples from the burned
7 vehicle, it is my professional opinion that there is
8 no evidence which conclusively indicates the
9 ignition source of the fire was associated with the
10 electrical system. The damage was so extensive that
11 evidence of electrical involvement could have been
12 obscured by the fire"?

13 A. Yes, sir.

14 Q. And do you understand that [REDACTED]
15 inspected the vehicle on January 5th, 1996?

16 A. Yes, sir.

17 Q. Okay. Were you able to find any conclusive
18 evidence that the fire was associated with the
19 electrical system of this vehicle?

20 A. No, sir.

21 Q. And also in the table of contents, it lists
22 page 50, automobile damage consultant's report.

23 A. Yes, sir.

24 Q. Did you have a page 50 to review?

25 A. No, sir. No. Forty-nine is as far as I

1 go.

2 Q. All right. And did you also review in Mr.
3 Vickers' conclusion his last sentence, that the more
4 probable cause for the fire was an electrical
5 failure possibly around the alternator terminal?

6 A. Yes, sir.

7 Q. Did you find any evidence that there was a
8 failure around the alternator terminal?

9 A. No. I found fire damage around the
10 alternator terminal but no failure.

11 MR. DAVIS: That's all I have.

12 FURTHER EXAMINATION

13 BY [REDACTED]:

14 Q. I've just got another couple of questions
15 for you based upon that. You've reviewed Dr.
16 Owens's report?

17 A. Yes.

18 Q. Okay. Is it correct to say that [REDACTED]
19 found intense blueing indicating intense heat in the
20 area where the air suspension system compressor and
21 its motor was mounted?

22 A. That's what he said.

23 Q. Okay. Do you have any reason to disbelieve
24 that?

25 A. Well, I didn't see it. I don't have any

1 belief -- any reason to disbelieve John, no.

2 Q. Okay.

3 A. But that's also -- again, that's also the
4 same place there's a quart of power steering fluid's
5 going to dump.

6 Q. Okay. And he found melted copper in the
7 engine compartment as well. Correct?

8 A. Oh, I believe that, yeah.

9 Q. Okay.

10 A. There's a big misconception about what the
11 temperatures can reach in an engine compartment.

12 [REDACTED] That's all I have.

13 (Deposition concluded at 10:49 a.m.)

14

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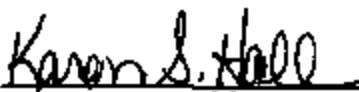
CERTIFICATE OF REPORTER

I, KAREN S. HALL, Court Reporter and Notary Public, Rankin County, Mississippi, do hereby certify that the foregoing 87 pages, and including this page, contain a full, true and correct transcript of the testimony of [REDACTED] as taken by me by means of Stenograph machine at the time and place heretofore stated in the aforementioned matter and later reduced to transcript form by me to the best of my skill and ability.

I further certify that I placed the witness under oath to truthfully answer all questions in this matter under the authority vested in me by the State of Mississippi.

I further certify that I am not related to or in any way associated with any of the parties to said cause of action, or their counsel, and that I am not interested in the event hereof.

IN WITNESS WHEREOF, I have hereunto set my hand this the 17th day of July, 1998.



Karen S. Hall, CSR
CSR No. 1196

My Commission Expires: 8/2/99



PROFESSIONAL RESUME

OF

WALTER RALPH NEWELL

I. General Information

A. Position

President

Gainesville, GA

Telephone

B. Residence

Gainesville, GA

C. Personal

Birthdate: June

Children: Two

II. Professional Summary

A. Education:

Gainesville, GA

GED Equivalent

B. Specialized Training

Georgia Police Academy

EXHIBIT

Investigative Services, Inc.

ISI

National Arson Conference
Rutgers University, 40 hours

Southeastern Arson Seminar
University of Georgia, 480 hrs
Instructor Staff

Alabama Fire Marshal's School
University of Alabama, 40 hrs

Florida Fire Marshal's School
Howard College, Cocoa, FL
40 hours

North Carolina Fire Marshal's
Institute, Greensboro, NC
40 hours

In-Service Training, INS
Investigative Bureau, Inc.
Approximately 400 hours

IAAI Seminar, 1984 - 1989
Clearwater Beach, Florida
64 hours

IAAI Seminar, 1986
Vancouver, British Columbia
32 hours

IAAI Seminar, 1986
Atlanta, Georgia, 32 hours

IAAI Seminar, 1987
Las Vegas, Nevada, 32 hours

C. Presentations:

Numerous classroom and
practical presentations on

NSI

Investigative Services, Inc.

arson, theft, and fraud
detection and investigation.
Presentations given to firemen
associations, insurance groups
IAAI, Georgia Chapter IAAI,
Ga. Fire Academy. Guest
Instructor in Florida, South
Carolina, Alabama and
Michigan Bureau ATF
Academy

D. Certification:

Certified Fire Investigator
International Association of
Arson Investigators

Personally handled and/or
supervised the investigation
into fires, fraud and claims
involving more than 3,000 cases
involving structures, heavy
equipment, vehicles, airplanes
and water crafts.

**E. Professional
Organizations:**

International Association of
Arson Investigators

Past President, GA Chapter
International Association of
Arson Investigators (Two Terms,
1988, 1994)

Vice President, Metro Arson
Association (Two terms)

Past Chairman, Georgia Chapter
IAAI Fire Investigator
Certification Committee,

Committee Member, IAAI

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EA02-025 37476



Investigative Services, Inc.

F. Experience

*Independent Investigator
Advisory Committee*

*U. S. Army, Airborne Infantry
June 21, 1960 to July 7, 1966*

*Hall County Sheriff's
Department Gainesville, GA
December 1968 to May 1974
Duties: Patrolman, jailer,
chief jailer, criminal
investigator, rank captain.*

*INS Investigation Bureau, Inc.
Atlanta, GA, 4-15-74 to 10-81
Duties: Investigator, special
agent, special agent
supervisor, chief special agent.*

*Kennedy & Kennedy, Inc.
Vice President, October 1981
to July 15, 1982.*

*Nowell Investigative Services
July 15, 1982 to Present*

G. Miscellaneous

*Qualified as expert witness in
the determination of origin &
cause in both federal and state
courts in Louisiana, Alabama,
Georgia, Florida, Tennessee,
Mississippi, South Carolina,
Puerto Rico, Massachusetts,
North Carolina, Michigan, Maryland,
California, New Jersey, Virginia.*

Investigative Services, Inc.



RATES AND CHARGES

Hourly Rates	[REDACTED] (Fire/Liability Investigations) All cases received after April 1997 [REDACTED] (Fire/Liability Investigations) All cases received before April 1997 (Cause & Origin Investigations)
Clerical Rates	[REDACTED] (Includes all phases of clerical work)
Expenses	Actual (Includes all out-of-pocket expenses involving materials, postage and lab work)
Mileage	.38 per mile
Photographs	\$ 1.50 per photo (Only photographs included with report. Copies at cost.)
Photocopies	.05 per copy



CASE TESTIMONY OF

October 9 & 10, 1997

v. Ford Motor Company
City Court Lake Charles, Louisiana; Parish of Calcasieu
Case Number: 95-739
NISI No. 1996-065 I

September 17, 1997

/Bryant Electric
Circuit Court Hamilton County, Tennessee; Division II
Case Number: 89-CV-924
NISI No. 1986-235 I

June 4-6, 1997

v. Ford Motor Company
U.S. District Court Southern Mississippi; Jackson Division
Civil Action Number: 3:94CV448-B-N
NISI No. 1996-065 I

May 5, 1997

v. Ford Motor Company
24th Judicial District; Jefferson Parish, Louisiana
Case Number: 487-418
NISI No. 1996-042 I

April 21-24, 1997

v. Ford Motor Company
U.S. District Court Southern District of Ohio; Eastern Division
Case Number: C2-95-307
NISI No. 1995-085 I

March 31- April 8, 1997

v. Ford Motor Company
NISI No. 1994-078 I

March 13 & 14, 1997

Fieldale
NISI No. 1990-171 I



Investigative Services, Inc.

March 3, 1997	[REDACTED]	v.	Ford Motor Company Circuit Court 6 th Judicial Circuit Pinellas County, Florida Case Number 93-2790-CI NISI No. 1994-026 I
December 4, 1996	[REDACTED]	v.	Ford Motor Company Circuit Court Cook County, Chicago; County Dept./Law Division Case Number 92L9345 NISI No. 1996-054 I
November 16, 1996	[REDACTED]	v.	Ford Motor Company NISI No. 1994-078 I
November 15, 1996	[REDACTED]	v.	Ford Motor Company NISI No. 1996-024 I
November 12, 1996	[REDACTED]	v.	Ford Motor Company NISI No. 1993-078 I
November 1, 1996	[REDACTED]	v.	Ford Motor Company Circuit Court Baltimore City Case Number: 95164025 CL202371 NISI No. 1995-105 I
October 21, 1996	[REDACTED]	v.	Ford Motor Company NISI No. 1994-071 I
September 25, 1996	[REDACTED]	v.	Alfa Insurance Company NISI No. 1994-030 I
September 12, 1996	[REDACTED]	v.	Georgia Farm Bureau NISI No. 1993-082 I
May 29, 1996	[REDACTED]	v.	Grange Mutual NISI No. 1993-140 I



Investigative Services, Inc.

May 6, 1996	[REDACTED]	v.	Ford Motor Company Circuit Court 1 st Judicial District of Jasper County, Mississippi Case Number: 94-0004 and 94-0026 NISI No. 1994-095 I
1995	[REDACTED]	v.	State of Georgia NISI No. 1994-125 I
May 8, 1995	[REDACTED]	v.	Georgia Farm Bureau NISI No. 1993-039 I
October 10, 1994	[REDACTED]	v.	State of Georgia NISI No. 1992-145 I
May 5, 1994	[REDACTED]	v.	Ford Motor Company 1994-066 I
May 4, 1994	[REDACTED]	v.	State of Georgia
April 6, 1994	[REDACTED]	v.	State Capital Insurance NISI No. 1990-172 I
March 1, 1994	[REDACTED]	v.	State NISI No. 1991-092 I
February 17, 1994	[REDACTED]	v.	Ford Motor Company NISI No. 1994-033 I
February 8, 1994	[REDACTED]	v.	State Farm Insurance Company NISI No. 1991-179 I
January 21, 1994	[REDACTED]	v.	Black & Decker NISI No. 1994-017 I
August 20, 1993	[REDACTED]	v.	Timothy Crumley NISI No. 1993-095 I
August 17, 1993	[REDACTED]	v.	Ford Motor Company NISI No. 1993-093 I



Investigative Services, Inc.

Date Unknown	[REDACTED] NISI No. 1985-009 I	v.	State Farm Insurance
Date Unknown	[REDACTED] NISI No. 1984-123 I	v.	State Farm Insurance
Date Unknown	[REDACTED] NISI No. 1984-085 I	v.	Sentry Indemnity
Date Unknown	[REDACTED] NISI No. 1984-073 I	v.	Maryland Casualty
Date Unknown	[REDACTED] NISI No. 1984-056 I	v.	New Hampshire
Date Unknown	[REDACTED] NISI No. 1984-044 I	v.	Continental Insurance
Date Unknown	[REDACTED] NISI No. 1984-007 I	v.	State Farm Insurance
Date Unknown	[REDACTED] NISI No. 1983-093 I		
Date Unknown	[REDACTED] NISI No. 1983-015 I		
Date Unknown	[REDACTED] NISI No. 1983-011 I	v.	Travelers Insurance
Date Unknown	[REDACTED] NISI No. 1983-003 I	v.	U.S.F. & G. Insurance
Date Unknown	[REDACTED] NISI No. 1982-042 I	v.	St. Paul Insurance
Date Unknown	[REDACTED] NISI No. 1982-036 I	v.	Ga. Underwriting



Investigative Services, Inc.

Date Unknown	[REDACTED] NISI No. 1982-025 I	v.	Firemonds Fund
Date Unknown	[REDACTED] NISI No. 1982-021 I	v.	St. Paul Insurance
Date Unknown	[REDACTED] NISI No. 1982-019 I	v.	New Hampshire Ins.
Date Unknown	[REDACTED] NISI No. 1982-016 I	v.	New Hampshire Ins.

Investigative Services, Inc.**nsi**

May 26, 1993	██████████ NISI No. 1993-080 I	v.	Alfa Insurance Company
1992	██████████ NISI No. 1986-045 I	v.	Ford Motor Company
October 1992	████████████████████ NISI No. 1991-050 I	v.	Alfa Insurance Company
October 12, 1992	██████████ NISI No. 1992-145 I	v.	Georgia Farm Bureau
September 15, 1992	██████████ NISI No. 1989-066 I	v.	Georgia Farm Bureau
June 9, 1992	██████████ NISI No. 1989-086 I	v.	State Farm Insurance
May 11, 1992	████████████████████ NISI No. 1990-214 I	v.	Georgia Farm Bureau
April 7, 1992	██████████ NISI No. 1990-012 I	v.	Ford Motor Company
April 1, 1992	████████████████████ NISI No. 1990-109 I	v.	Ford Motor Company
January 28, 1992	████████████████████ NISI No. 1990-157 I	v.	Federated Insurance
January 23, 1992	██████████		
January 6, 1992	██████████		
August 20, 1991	██████████ NISI No. 1989-184 I	v.	Amesa Refrigeration



Investigative Services, Inc.

May 30, 1991	██████████ NSI No. 1991-089 I	v.	Georgia Farm Bureau
March 28, 1991	██████████ NSI No. 1991-062 I	v.	Miller Oil
January 14, 1991	██████████		
November 9, 1990	██████████ NSI No. 1990-194 I	v.	State Farm Insurance
November 9, 1990	██████████ NSI No. 1990-195 I	v.	State Farm Insurance
August 6, 1990	██████████ NSI No. 1990-149 I	v.	O'Mark Industries
February 15, 1990	██████████ NSI No. 1990-038 I	v.	St. Paul Insurance
September 1, 1989	██████████ NSI No. 1989-183 I	v.	Nationwide Insurance
1988	██████████ NSI No. 1985-159 I	v.	Ford Motor Company
November 28, 1988	██████████ NSI No. 1988-241 I	v.	South Carolina Insurance
October 28, 1988	██████████ NSI No. 1988-222 I	v.	Ford Motor Company
May 9, 1988	██████████ NSI No. 1988-104 I	v.	O'Mark
December 30, 1987	██████████ NSI No. 1987-244 I	v.	Federal Kemper



Investigative Services, Inc.

Date Unknown	[REDACTED] NISI No. 1986-249 I	v.	Ford Motor Company
Date Unknown	[REDACTED] NISI No. 1986-191 I	v.	Aetna Insurance
Date Unknown	[REDACTED] NISI No. 1986-146 I	v.	State Farm Insurance
Date Unknown	[REDACTED] NISI No. 1986-143 I	v.	Hanover Insurance
Date Unknown	[REDACTED] NISI No. 1986-078 I	v.	St. Paul Insurance
Date Unknown	John & Sandy Massey NISI No. 1986-067 I	v.	Ga. Underwriting
Date Unknown	[REDACTED] NISI No. 1986-060 I	v.	Georgia Farm Bureau
Date Unknown	[REDACTED] NISI No. 1985-178 I	v.	Georgia Farm Bureau
Date Unknown	[REDACTED] NISI No. 1985-164 I	v.	Cincinnati Insurance
Date Unknown	[REDACTED] NISI No. 1985-157 I	v.	Georgia Farm Bureau
Date Unknown	[REDACTED] NISI No. 1985-144 I	v.	Ford Motor Company
Date Unknown	[REDACTED] NISI No. 1985-108 I	v.	David Kazan
Date Unknown	[REDACTED] NISI No. 1985-068 I	v.	Federated Insurance



Investigative Services, Inc.

October 1, 1987	[REDACTED] NISI No. 1987-181 I	v.	Preferred Risk Mutual
August 23, 1987	[REDACTED] NISI No. 1987-161 I	v.	Susan Holbyn & Majestic Paint
August 11, 1987	[REDACTED] NISI No. 1987-155 I	v.	Black & Decker
July 16, 1987	[REDACTED] NISI No. 1987-135 I		
April 24, 1987	[REDACTED] NISI No. 1987-096 I	v.	Amerisure Insurance
April 13, 1987	[REDACTED] NISI No. 1987-090 I	v.	State Farm Insurance
March 10, 1987	[REDACTED] NISI No. 1987-058 I	v.	Alabama Farm Bureau
December 8, 1986	[REDACTED] NISI No. 1986-235 I	v.	Travelers Insurance
October 6, 1986	[REDACTED] NISI No. 1986-185 I	v.	Ga. Underwriters
March 20, 1986	[REDACTED] NISI No. 1986-044 I	v.	Travelers Insurance
June 11, 1985	[REDACTED] NISI No. 1985-087 I		
1983	[REDACTED] NISI No. 1983-058 I	v.	Travelers Insurance
Date Unknown	[REDACTED] NISI No. 1987-129 I	v.	Klinger Electric Company

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ER82-025 37487



Investigative Services, Inc.

DEPOSITIONS OF WALTER RALPH NEWELL

August 19, 1997	██████████ NISI No. 1997-038 I	v.	Ford Motor Company
July 30, 1997	██████████ NISI No. 1997-056 I	v.	Ford Motor Company
July 17, 1997	██████████ NISI No. 1997-001 I	v.	Ford Motor Company
May 27, 1997	██████████ NISI No. 1996-071 I	v.	Ford Motor Company
February 21, 1997	██████████ NISI No. 1994-027 I	v.	State Farm Insurance
January 21, 1997	██████████ NISI No. 1994-057 I	v.	Ford Motor Company
January 8, 1997	██████████ NISI No. 1994-026 I	v.	Ford Motor Company
October 4, 1996	██████████ NISI No. 1994-127 I	v.	Civilian Club
October 3, 1996	██████████ NISI No. 1995-092 I	v.	Pounds
September 23, 1996	██████████ NISI No. 1994-011 I	v.	Ford Motor Company
September 18, 1996	██████████ NISI No. 1994-072 I	v.	Southern States Supply
August 20, 1996	██████████ NISI No. 1996-054 I	v.	Ford Motor Company

**Investigative Services, Inc.**


July 23, 1996	[REDACTED] NISI No. 1995-105 I	v. Ford Motor Company
July 18, 1996	[REDACTED] NISI No. 1994-104 I	v. Chrysler
April 17, 1996	[REDACTED] NISI No. 1996-024 I	v. Ford Motor Company
April 9 & 25, 1996	[REDACTED] NISI No. 1995-086 I	v. Ford Motor Company
March 28, 1996	[REDACTED] NISI No. 1994-078 I	v. Ford Motor Company
March 25, 1996	[REDACTED] NISI No. 1994-044 I	v. Georgia Farm Bureau
February 15, 1996	[REDACTED] NISI No. 1995-023 I	v. Ga. Power
February 13, 1996	[REDACTED] NISI No. 1995-085 I	v. Ford Motor Company
February, 1996	[REDACTED] NISI No. 1995-104 I	v. Ford Motor Company
July 31, 1995	[REDACTED] NISI No. 1993-121 I	v. Auto Owners
July 3, 1995	[REDACTED] NISI No. 1995-048 I	v. Ford Motor Company
January 25, 1995	[REDACTED]	v. General Motors
January 12, 1995	[REDACTED] NISI No. 1994-066 I	v. Ford Motor Company


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E982-025 37489


 Investigative Services, Inc.



CASE TESTIMONY OF WALTER


April 9, 1998  v. Jack Ernest Power
 Superior Court for the County of Elbert, Criminal Division
 Case Number: 96-OR-140-B
 NISI No. 1996-074 I
 - Arson -

December 15, 1997  v. Sheila Bryan
 Superior Court for the County of Colquitt
 Criminal Number: 97CR-494
 NISI No. 1996-068 I
 - Murder/Arson -

October 9 & 10, 1997  v. Ford Motor Company
 City Court Lake Charles, Louisiana; Parish of Calcasieu
 Case Number: 95-739
 NISI No. 1996-065 I
 - Electrical Fire/Wire Harness -

September 17, 1997  Bryant Electric
 Circuit Court Hamilton County, Tennessee; Division II
 Case Number: 89-CV-924
 NISI No. 1986-235 I
 - Computer -

June 4-6, 1997  v. Ford Motor Company
 U.S. District Court Southern Mississippi; Jackson Division
 Civil Action Number: 3:94CV448-B-N
 NISI No. 1996-065 I
 - Post Collision Fire -

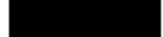

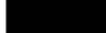






May 5, 1997  v. Ford Motor Company
 24th Judicial District; Jefferson Parish, Louisiana
 Case Number: 487-418
 NISI No. 1996-042 I
 - Exhaust System Fire -

EXHIBIT
Z. Newell


Investigative Services, Inc.


April 21-24, 1997		v.	Ford Motor Company
	U.S. District Court Southern District of Ohio; Eastern Division		
	Case Number: C2-95-307		
	NISI No. 1995-085 I		
	- Garage Fire -		
March 31-April 8, 1997		v.	Ford Motor Company
	NISI No. 1994-078 I		
	- Garage Fire -		
March 13 & 14, 1997		Fieldale	
	NISI No. 1990-171 I		
	- Hydraulic Fire -		
March 3, 1997		v.	Ford Motor Company
	Circuit Court 6 th Judicial Circuit Pinellas County, Florida		
	Case Number: 93-2290-CI		
	NISI No. 1994-026 I		
	- Collision Fire -		
December 4, 1996		v.	Ford Motor Company
	Circuit Court Cook County, Chicago; County Dept./Law Division		
	Case Number 92L9345		
	NISI No. 1996-054 I		
	- Collision Fire -		
November 16, 1996		v.	Ford Motor Company
	NISI No. 1994-078 I		
	- Garage Fire -		
November 15, 1996		v.	Ford Motor Company
	NISI No. 1996-024 I		
	- Coolant Fire -		
November 12, 1996		v.	Ford Motor Company
	NISI No. 1995-078 I		
	- Gasoline Fire -		

[REDACTED] Investigative Services, Inc.

NSI

November 1, 1996	[REDACTED]	v.	Ford Motor Company Circuit Court Baltimore City Case Number: 95264025 CL202371 NISI No. 1995-105 I - Collision Fire -
October 21, 1996	[REDACTED]	v.	Ford Motor Company NISI No. 1994-071 I - Employee Fire -
September 25, 1996	[REDACTED]	v.	Alfa Insurance Company NISI No. 1994-030 I - Arson House Fire -
September 12, 1996	[REDACTED]	v.	Georgia Farm Bureau NISI No. 1993-082 I - Arson House Fire -
May 29, 1996	[REDACTED]	v.	Grange Mutual NISI No. 1993-140 I - Arson House Fire -
May 6, 1996	[REDACTED]	v.	Ford Motor Company Circuit Court 1 st Judicial District of Jasper County, Mississippi Case Number: 94-0004 and 94-0026 NISI No. 1994-095 I - Post Collision Fire -
1995	[REDACTED]	v.	State of Georgia NISI No. 1994-125 I - Arson/Murder -
May 8, 1995	[REDACTED]	v.	Georgia Farm Bureau NISI No. 1993-039 I - Arson House Fire -
October 10, 1994	[REDACTED]	v.	State of Georgia NISI No. 1992-145 I - Arson House Fire -

[REDACTED] Investigative Services, Inc.

nsi

May 5, 1994	[REDACTED] 1994-066 I - Post Collision Fire -	v.	Ford Motor Company
May 4, 1994	[REDACTED] - Arson/Murder -	v.	State of Georgia
April 6, 1994	[REDACTED] NISI No. 1990-172 I - Arson -	v.	State Capital Insurance
March 1, 1994	[REDACTED] NISI No. 1991-092 I - Subrogation -	v.	Stain
February 17, 1994	[REDACTED] NISI No. 1994-032 I - Post Collision Fire -	v.	Ford Motor Company
February 4, 1994	[REDACTED] NISI No. 1991-179 I	v.	State Farm Insurance Company
January 21, 1994	[REDACTED] NISI No. 1994-017 I - Appliance Fire -	v.	Black & Decker
August 20, 1993	[REDACTED] NISI No. 1993-095 I - Arson/Murder -	v.	Timothy Crumbly
August 17, 1993	[REDACTED] NISI No. 1993-093 I - Alleged Wire Harvest Fire -	v.	Ford Motor Company
May 26, 1993	[REDACTED] NISI No. 1993-080 I	v.	Alfa Insurance Company
1992	[REDACTED] NISI No. 1986-045 I - Post Collision Fire -	v.	Ford Motor Company


Investigative Services, Inc.

October 1992	[REDACTED]	v. Alfa Insurance Company
	NISI No. 1991-050 I	
	- Arson -	
October 12, 1992	[REDACTED]	v. Georgia Farm Bureau
	NISI No. 1992-145 I	
	- Arson -	
September 13, 1992	[REDACTED]	v. Georgia Farm Bureau
	NISI No. 1989-066 I	
	- Arson -	
June 9, 1992	[REDACTED]	v. State Farm Insurance
	NISI No. 1989-086 I	
	- Arson -	
May 11, 1992	[REDACTED]	v. Georgia Farm Bureau
	NISI No. 1990-214 I	
	- Arson -	
April 7, 1992	[REDACTED]	v. Ford Motor Company
	NISI No. 1990-012 I	
April 1, 1992	[REDACTED]	v. Ford Motor Company
	NISI No. 1990-109 I	
	- Post Collision Fire -	
January 28, 1992	[REDACTED]	v. Federated Insurance
	NISI No. 1990-157 I	
January 23, 1992	[REDACTED]	-
January 6, 1992	[REDACTED]	-
August 20, 1991	[REDACTED]	v. Amana Refrigeration
	NISI No. 1989-184 I	
	- Appliance Fire -	






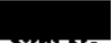

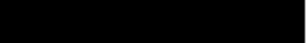

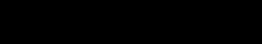
[REDACTED] Investigative Services, Inc.

NSI






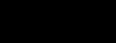




May 30, 1991	[REDACTED] NISI No. 1991-089 I - Light Fixture Fire -	v.	Georgia Farm Bureau
March 28, 1991	[REDACTED] NISI No. 1991-062 I - Fuel Fire -	v.	Miller Oil
January 14, 1991	[REDACTED]		
November 9, 1990	[REDACTED] NISI No. 1990-194 I - Arson -	v.	State Farm Insurance
November 9, 1990	[REDACTED] NISI No. 1990-195 I - Arson -	v.	State Farm Insurance
August 6, 1990	[REDACTED] NISI No. 1990-149 I - Alleged Electrical Fire -	v.	O'Mark Industries
February 15, 1990	[REDACTED] /b/a Danny's Restaurant NISI No. 1990-038 I - Arson -	v.	St. Paul Insurance
September 1, 1989	[REDACTED] NISI No. 1989-183 I - Arson -	v.	Nationwide Insurance
1988	[REDACTED] NISI No. 1985-159 I - Colliding Fire -	v.	Ford Motor Company
November 28, 1988	[REDACTED] NISI No. 1988-241 I - Arson -	v.	South Carolina Insurance

 Investigative Services, Inc.



October 28, 1988	 v.	Ford Motor Company
	NISI No. 1988-222 I	
	- Motor Horn -	
May 9, 1988	 v.	O'Mark
	NISI No. 1988-104 I	
	- Alleged Electrical -	
December 30, 1987	 v.	Federal Kemper
	NISI No. 1987-244 I	
	- Arson -	
October 1, 1987	 v.	Preferred Risk Mutual
	NISI No. 1987-181 I	
	- Subrogation -	
August 25, 1987	 v.	Susan Boleyn & Majestic
	NISI No. 1987-161 I	
	- Liability Suit -	
August 11, 1987	 v.	Black & Decker
	NISI No. 1987-155 I	
	- Lightning -	
July 16, 1987	 v.	
	NISI No. 1987-135 I	
April 24, 1987	 v.	American Insurance
	NISI No. 1987-096 I	
	- Arson -	
April 13, 1987	 v.	State Farm Insurance
	NISI No. 1987-090 I	
	- Arson -	
March 10, 1987	 v.	Alabama Farm Bureau
	NISI No. 1987-058 I	
	- Arson -	

 **Investigative Services, Inc.**


December 8, 1986	 v.	Travelers Insurance
	NISI No. 1986-235 I	
	- Computer Failure -	
October 6, 1986	 v.	Ga. Underwriters
	NISI No. 1986-185 I	
	- Arson -	
March 20, 1986	 v.	Travelers Insurance
	NISI No. 1986-044 I	
	- Arson -	
June 11, 1985	 v.	
	NISI No. 1985-087 I	
1983	 v.	Travelers Insurance
	NISI No. 1983-058 I	
	- Arson -	
Date Unknown	 v.	Klinger Electric Company
	NISI No. 1987-129 I	
	- Alleged Electrical -	
Date Unknown	 v.	Ford Motor Company
	NISI No. 1986-249 I	
	- Alleged Electrical -	
Date Unknown	 v.	Actna Insurance
	NISI No. 1986-191 I	
	- Arson -	
Date Unknown	 v.	State Farm Insurance
	NISI No. 1986-146 I	
	- Arson -	
Date Unknown	 v.	Hanover Insurance
	NISI No. 1986-143 I	
	- Arson -	










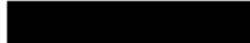
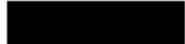
Investigative Services, Inc.

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Date Unknown	[REDACTED] NISI No. 1986-078 I	v.	St. Paul Insurance
Date Unknown	[REDACTED] NISI No. 1986-067 I - Arson -	v.	Ga. Underwriting
Date Unknown	[REDACTED] NISI No. 1986-060 I	v.	Georgia Farm Bureau
Date Unknown	[REDACTED] NISI No. 1985-178 I - Arson -	v.	Georgia Farm Bureau
Date Unknown	[REDACTED] NISI No. 1985-164 I	v.	Cincinnati Insurance
Date Unknown	[REDACTED] NISI No. 1985-157 I - Arson -	v.	Georgia Farm Bureau
Date Unknown	[REDACTED] NISI No. 1985-144 I - Alleged Fuel Fire -	v.	Ford Motor Company
Date Unknown	[REDACTED] NISI No. 1985-108 I	v.	David Kazan
Date Unknown	[REDACTED] NISI No. 1985-068 I - Arson -	v.	Federated Insurance
Date Unknown	[REDACTED] NISI No. 1985-009 I	v.	State Farm Insurance
Date Unknown	[REDACTED] NISI No. 1984-123 I - Arson -	v.	State Farm Insurance


Investigative Services, Inc.

NSI

Date Unknown	 v.	Sentry Indemnity
	NISI No. 1984-085 I	
	- Arson -	
Date Unknown	 v.	Maryland Casualty
	NISI No. 1984-073 I	
Date Unknown	 v.	New Hampshire
	NISI No. 1984-056 I	
Date Unknown	 v.	Continental Insurance
	NISI No. 1984-044 I	
	- Liability -	
Date Unknown	 v.	State Farm Insurance
	NISI No. 1984-007 I	
	- Arson -	
Date Unknown	 v.	
	NISI No. 1983-093 I	
Date Unknown	 v.	
	NISI No. 1983-015 I	
	- Arson -	
Date Unknown	 v.	Travelers Insurance
	NISI No. 1983-011 I	
Date Unknown	 v.	U.S.F. & G. Insurance
	NISI No. 1983-003 I	
	- Gas Explosion -	
Date Unknown	 v.	St. Paul Insurance
	NISI No. 1982-042 I	
	- Arson -	
Date Unknown	 v.	Ga. Underwriting
	NISI No. 1982-036 I	
	- Arson -	

Investigative Services, Inc.



- Date Unknown [REDACTED] v. Firemans Fund
NISI No. 1982-025 I
- Arson -
- Date Unknown [REDACTED] v. St. Paul Insurance
NISI No. 1982-021 I
- Arson -
- Date Unknown [REDACTED] v. New Hampshire Ins.
NISI No. 1982-019 I
- Arson -
- Date Unknown [REDACTED] v. New Hampshire Ins.
NISI No. 1982-016 I
- Arson -

Investigative Services, Inc.



DEPOSITIONS OF WALTER [REDACTED]








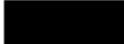



- May 14, 1998 [REDACTED] v. Ford Motor Company
 Civil Action Number: 97-0693R
 United State District Court for the Western District of Oklahoma
 NISI No. 1997-072 I
 - Alleged Ignition Switch -
- May 4, 1998 [REDACTED] v. Ford Motor Company
 Civil Action Numbers: C794-698 and C4-95-667
 United States District Court State of Minnesota, County of Brown
 5th Judicial District
 NISI No. 1997-093 I
 - Alleged Ignition Switch -
- April 14, 1998 [REDACTED] v. Ford Motor Company
 At Law Number: 96-4045
 Circuit Court for the City of Norfolk, State of Virginia
 NISI No. 1997-069 I
 - Alleged Gasoline Leak -
- March 20, 1998 [REDACTED] d/b/a v. Liebherr-America, Inc.
 Kip Hunter Grading
 Civil Action Number: 197-CV-006
 United States District Court in the Northern District of Georgia
 Atlanta Division
 NISI No. 1995-036 I
 - Bursted Hose -
- March 12, 1998 [REDACTED] v. Deere & Company
 Civil Action Number: 97-S-2395-NE
 United States District Court for the Northern District of Alabama,
 Northeastern Division
 NISI No. 1995-110 I
 - Electrical Short -

Investigative Services, Inc.

NSI

January 29, 1998	[REDACTED]	v.	Ford Motor Company
	NISI No. 1997-044 I		
	- Alleged Ignition Switch -		
December 2, 1997	[REDACTED]	v.	Subaru
	Civil Action Number: 96-14629NP		
	Circuit Court for the County of Grand Traverse, State of Michigan		
	NISI No. 1997-025 I		
	- Alleged Exhaust System Failure -		
August 19, 1997	[REDACTED]	v.	Ford Motor Company
	NISI No. 1997-038 I		
	- Post Collision -		
July 30, 1997	[REDACTED]	v.	Ford Motor Company
	NISI No. 1997-056 I		
	- Post Collision -		
July 17, 1997	[REDACTED]	v.	Ford Motor Company
	NISI No. 1997-001 I		
	- Alleged Ignition Switch -		
May 27, 1997	[REDACTED]	v.	Ford Motor Company
	NISI No. 1996-071 I		
February 21, 1997	[REDACTED]	v.	State Farm Insurance
	NISI No. 1994-027 I		
	- Liability Case/Gasoline -		
January 21, 1997	[REDACTED]	v.	Ford Motor Company
	NISI No. 1994-057 I		
January 8, 1997	[REDACTED]	v.	Ford Motor Company
	NISI No. 1994-026 I		
	- Collision Fire -		
October 4, 1996	[REDACTED]	v.	Civitan Club
	NISI No. 1994-127 I		
	- Negligence -		


Investigative Services, Inc.


October 3, 1996	 NISI No. 1995-092 I	v.	Peonds
September 23, 1996	 NISI No. 1994-011 I - Alleged Electrical Fire -	v.	Ford Motor Company
September 18, 1996	 Peach NISI No. 1994-072 I - Propane Fire -	v.	Southern States Supply
August 20, 1996	 NISI No. 1996-054 I - Post Collision -	v.	Ford Motor Company
July 23, 1996	 NISI No. 1995-105 I - Post Collision -	v.	Ford Motor Company
July 18, 1996	 NISI No. 1994-104 I - Wire Harness Fire -	v.	Chrysler
April 17, 1996	 NISI No. 1996-024 I - Coolant Fire -	v.	Ford Motor Company
April 9 & 25, 1996	 NISI No. 1995-086 I - Alleged Fuel Fire -	v.	Ford Motor Company
March 28, 1996	 NISI No. 1994-078 I - Garage Fire -	v.	Ford Motor Company
March 25, 1996	 NISI No. 1994-044 I	v.	Georgia Farm Bureau
February 15, 1996	 NISI No. 1995-023 I	v.	Ga. Power

Investigative Services, Inc.



February 13, 1996	██████████ NISI No. 1995-085 I - Garage Fire -	v.	Ford Motor Company
February, 1996	██████████ NISI No. 1995-104 I - Alleged Electrical Fire -	v.	Ford Motor Company
July 31, 1995	██████████ NISI No. 1993-121 I - Arson -	v.	Auto Owners
July 3, 1995	██████████ NISI No. 1995-048 I	v.	Ford Motor Company
January 25, 1995	██████████ - Alleged Fuel Fire -	v.	General Motors
January 12, 1995	██████████ NISI No. 1994-066 I - Post Collision -	v.	Ford Motor Company
January, 1995	██████████ NISI No. 1995-107 I	v.	Black & Decker
September 18, 1994	██████████ NISI No. 1994-032 I - Post Collision -	v.	Ford Motor Company
June 22, 1994	██████████ NISI No. 1993-093 I - Alleged Electrical Fire -	v.	Ford Motor Company
June 16, 1994	██████████ NISI No. 1994-017 I - Appliance Fire -	v.	Black & Decker
June 8, 1994	██████████ NISI No. 1993-098 I	v.	Allstate Insurance

Investigative Services, Inc.



February 16, 1994

[REDACTED]
NISI No. 1994-030 I
- Arson -

v. Alfa Insurance

July 1, 1993

[REDACTED]
NISI No. 1991-092 I

v. Stein

March 23, 1993

[REDACTED]
NISI No. 1993-080 I
- Arson -

v. Alfa Insurance

December 3, 1992

July 29, 1992

[REDACTED]

v. Ford Motor Company

March 20, 1992

April, 1991

[REDACTED] &
Frazz Bonds
NISI No. 1991-050 I
- Arson -

v. Alfa Insurance

April 30, 1991

March 27, 1991

[REDACTED]

This is Malcolm Houston State Farm Insurance. Today's date is December 11, 1995. I'm speaking with [REDACTED]

QUESTION: [REDACTED] would you please state your name for the record please?

ANSWER: This is Lawrence [REDACTED]

Q: And [REDACTED]

A1: I am [REDACTED]

Q: O.K., are you both aware that it is this statement is being recorded?

A: Yes.

A1: Yes.

A: Yes.

A1: We are.

Q: And is it being recorded with your full knowledge and consent?

A: Yes, I can see the recorder.

A1: Yes.

Q: What I wanted to do is I wanted to get your, uh a little more detailed statement about where the fire was actually coming from when you first came out and saw it. So if you would start from where you heard the fire, but really what I'm interested in now is what you did when you opened the door where you saw what did you see when you opened the door

A1: When I opened the door first I saw smoke and then I saw fire was coming from around the tire. I didn't look real close, 'cause when I saw it I just ran and told my husband that our car was on fire.

Q: O.K., were there any lights on outside where the.

A1: Uh uh.

Q: Porch light on. All you could see then when you opened the door was.

A1: Well, I turned the porch the carport light on.

Q: O.K.

A: And I seen the smoke and, uh and, uh-well, I turned the light on and the first thing I seen was just noticed the car and the smoke.

Q: Where did the fire appear to be coming from when you saw it?

A1: It was around the top part of the tire that I saw that was, uh a little bit of flame was some flame up there and then when I got my husband he looked under it was coming from under the hood and we could see flames under the hood from the crack under the hood.

EXHIBIT

3 Nov 11

Page 2
December 18, 1995

Q: O.K., the fire that you saw was contained to the car had not spread yet.

A1: Uh uh, it was just on the, the it was on the car and the top it was on dripping on the tire.

Q: O.K.

A1: It was smoke coming from the tire.

Q: O.K.

A1: So it was burning some it wasn't burning real bad when we first saw it, but it was burning.

Q: When I, when I go out and took a look at the scene the second time the first time I want I really couldn't take a close look, because it was still burning, but the second time I noticed that there was a lawn mower.

A1: Uh huh.

Q: Parked beside the car.

A1: Uh huh.

Q: And there was also.

A1: Uh huh.

Q: A gas can on the other side.

A1: On the other side.

Q: Could you tell from what you saw where the fire was coming from?

A1: It was coming directly from the car. There was nothing not coming anywhere else. It was on the left-hand side on the front left tire.

Q: All right.

A1: The lawn mower we walked right by it several times. There was nothing on the lawn mower.

Q: O.K., you walked.

A1: It didn't even start it was not running at all.

Q: You walked by the lawn mower while you were trying.

A1: Uh huh, while I was trying to put out the, uh the fire.

Q: So the minute that you saw it you turned the light on the porch and you saw it then.

A1: Well, I turned the light on first before I opened the door.

Q: O.K.

Page 3
December 18, 1995

AI: And then I saw smoke just the instance I opened the door saw smoke and then I saw on the tire that it was burning around the tire, but I didn't look that close I just saw smoke and I ran and told him the car was on fire.

Q: O.K.

AI: It was definitely from the car.

Q: [REDACTED] what did you see when you first stepped out there?

A: Well, I remember a little bit more than I did the last time that we had this recording about this (inaudible), uh I woke up instantly when she told me the car was on fire and I jumped up out of bed. I did not have any clothes on at all and I went out the den door, which is on the same side as the left front tire of the car and the very first thing I saw was something dripping down and on fire and there was a puddle of material that was on fire beside the left front tire. That's the first thing I saw. Then I saw a glow coming out from underneath the fender wheel and that's when I realized there was fire up underneath it. Then I went out to the fender wheel and I must have placed my left-hand on top of the hood as I bent down and looked up underneath the fire I got right up to it and looked up underneath the left front fender well and I could see up under the hood in that back area back there was all ablaze and that there was plastic material I assume it was plastic material dripping moulton and on fire down there on the tire and there was about an 8" x 4" patch on the tire that was on fire and what moulton rubber was running down on the pavement.

Q: O.K., so you saw something dripping from the tire wheel onto the tire?

A: Onto the tire and also saw, uh moulton rubber running down the tire that was on fire.

Q: O.K., did you see anything on the concrete itself?

A: Yes.

Q: O.K., what did you see?

A: Some kind of material burning it was moulton and burning.

AI: Dripping down in the car.

A: I don't know if it was.

Q: Did it appear to be.

A: Whether plastic or rubber or both.

Q: Appear to be the same thing that was on the tire?

A: It had the same color of the fire orangeish yellow.

Page 4
December 18, 1995

- Q: But you noticed a separation that the fire which you saw was definitely coming from the car?
- A: I saw fire in three places from the puddle of material on the concrete, the tire itself, and up underneath the engine compartment back through the fender wheel. Also, then I ran into the house and got a small pitcher of water and came out through the, uh, uh utility room door, which is squarely in front of the car and there was no fire anywhere else, the gas can was to the left, nothing was on fire to the left, nothing was on fire to the right of the car just the car itself. There was no fire around it anywhere, but in that area of the left front fender of the car and I attempted to put out the flames with water and it did no good.
- A1: Seemed like I did too we both was putting water on it.
- A: Seemed like the more you poured it it just.
- A: When we were in the front of the car we could tell on both sides of the car that it was only confined to one corner at that time.
- Q: O.K.
- A: At that time.
- A1: On the left hand side.
- Q: When you poured the water on it.
- A1: It seemed like it was just making it more.
- A: Spreading.
- A1: More.
- A: Yeah.
- Q: But it was definitely under the hood?
- A: Under the hood.
- Q: There was nothing on top of the hood?
- A: Nothing on top.
- A1: Uh uh, no it wasn't burning on top the top was fine.
- A: We caught this fire at its very very early stages.
- A1: Underneath I don't know about underneath.
- A: Well, it hadn't been there long it couldn't have been.
- A1: Oh, I just heard the frying sound and that's what.
- Q: Is there a lot of smoke when you opened the door?
- A1: Quite a bit.
- A: I'd say there was didn't seem like there was to me.
- A1: Well, it did to me.
- A: It didn't it just seemed like.
- A1: (inaudible) I mean I was.
- A: (inaudible).
- A1: I was so excited when I first saw it I just saw the smoke.
- A: But then again I never looked at the smoke.

A1: And then.

A: I was looking at the fire, but it didn't seem like a lot to me.

A1: I turned the the carport light was on, but when we came back it was out so the heat had done got the bulb and I lit the switch again and it wouldn't come on and I saw well its out. So it didn't take long for the after I turned the light on that the light bulb went out.

Q: I saw that.

A1: I mean when you're excited like that you just notice smoke you not really noticing how much it was.

A: (inaudible).

A1: To me there was a good bit of smoke.

Q: I think any amount of smoke would seem like a lot to her?

A1: Yeah, it was a good bit of smoke.

A: But to me for the kind of fire it was in the beginning I think there was very little amount of smoke.

Q: O.K., that's all that I have, uh I wanted to ask one more thing you're car is normally serviced by yourself or by someone else?

A: (inaudible) Brothers (inaudible) my car.

Q: O.K., they service your car so they would have records of any everything that has been done to it since you've had it.

A: Right.

Q: O.K. this is Malcolm Houston with State Farm Insurance. [REDACTED] would you please state your name one more time

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

Q: Are you both aware that this was recorded and was it recorded with your full knowledge and consent?

A: Completely.

A1: Yes, it was.

Q: Thank you.



State Farm Mutual Automobile Insurance Company
 State Farm Fire and Casualty Company
 State Farm County Mutual Insurance Company, of Texas
 State Farm Indemnity Company

Claim Number [REDACTED]

AFFIDAVIT OF VEHICLE FIRE (All Questions Must Be Completed)

1. Names of Insured [REDACTED] Name of Owner [REDACTED]
 Address [REDACTED] Home Phone [REDACTED]
 Date of Birth [REDACTED] Marital Status: Married Single No. of Dependents 2
 Social Security No. [REDACTED] Driver's License No. [REDACTED]
 Occupation COMPUTER TECHNICIAN
 Employer's Name PROVEY ELECTRONICS
 Address [REDACTED] MORNING, MS. Phone [REDACTED]

2. Date of Fire 12-6-95 Time 1:00 A.M. P.M.
 Make of Vehicle MERCURY Year 1992 Model GRAND MARQUIS Body Type 4-DR. SED Color GRAY
 Vehicle ID # _____ License Plate # _____ State MS.
 Certificate of Title # _____ If none, why? REMOVED
 Number of cylinders 8 H.P. or C.I. or Liter _____ Odometer reading 76,000
 Was vehicle locked? Yes No Were windows rolled up? Yes No
 When did you last see your vehicle? Date 12-6-95 Time 1:00 A.M. P.M.
 Specific location where vehicle burned GARAGE - RESIDENCE
 Reason vehicle was left at this location WE DID LIVE THERE.

Name and address of person who left auto at this location [REDACTED]
COLLINGSVILLE, MS. Their driver's license no. [REDACTED]

When was the fire discovered? Date 12-6-95 Time 1:00 A.M. P.M.
 Who made the discovery? [REDACTED]
 When was fire reported to fire department? Date 12-6-95 Time 1:04 A.M. P.M.
 Name and Location of Fire Station DUFFEE VOL. FIRE DEPT. - DUFFEE, MS.
 Describe fire (where, color of smoke, cause): UNDER HOOD; L. FRONT TIRE - BLACK

Was vehicle being driven? Yes No Describe exactly what happened prior to noticing smoke
 or fire (electrical or mechanical malfunction): HEARD RATTING NOISE FROM GARAGE
 Were you carrying a container of flammable liquid in the vehicle at the time of fire? Yes No
 If yes, give type of liquid _____, amount _____, size and
 type of container _____, location of container at time of fire _____

Did you smell smoke or see flames first? NO

Have you had similar problems prior to this? Yes No If Yes, describe: _____

Has vehicle been damaged during the past three years? Yes No If so, give location _____

_____, type of damage _____, amount of damage \$ _____, and date _____

Were repairs made? Yes No Partial If so, were they completed? Yes No

Who made the repairs? ETHRIDGE BROS. LIMITED LIABILITY

Name and address of insurance company who paid claim damages, if any: _____

Any other claims in the last three years on this or any other auto? Yes No

Any other vehicles in your household? Yes No

Name of insurance company and agent on other vehicles STATE FARM - CHARLES GARRET

Your prior insurance company and agent _____

Any homeowners claims within the past 6 months with State Farm? Yes No

With any other carrier? _____

3. Vehicle Equipment (Check if vehicle had any of the following)

- | | | | | |
|---|---|--|--|---|
| <input type="checkbox"/> Radio AM | <input checked="" type="checkbox"/> Power Steer. | <input type="checkbox"/> Vinyl Roof | Tires: | Transmission: |
| <input checked="" type="checkbox"/> AM/FM | <input checked="" type="checkbox"/> Power Brakes | <input checked="" type="checkbox"/> Tinted Glass | <input type="checkbox"/> W/W | <input checked="" type="checkbox"/> Automatic |
| <input checked="" type="checkbox"/> Stereo | <input checked="" type="checkbox"/> Power Locks | <input type="checkbox"/> Mag Wheels | <input checked="" type="checkbox"/> Radial | <input type="checkbox"/> Standard |
| <input checked="" type="checkbox"/> Tape Deck | <input checked="" type="checkbox"/> Power Windows | <input type="checkbox"/> T-Tops | <input type="checkbox"/> Special | <input type="checkbox"/> Console |
| <input checked="" type="checkbox"/> Air Cond. | <input checked="" type="checkbox"/> Power Seats | | | |
| <input checked="" type="checkbox"/> Other: | <u>Air Suspension, Keyless Entry</u> | | | |

CB Radio Type _____ Cost \$ _____ Date installed _____

Purchased From: _____

4. Vehicle Condition

- | | | | |
|--------------|-------------------------------|-------------------------------|---|
| Paint | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |
| Transmission | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |
| Engine | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |
| Body | <input type="checkbox"/> Fair | <input type="checkbox"/> Good | <input checked="" type="checkbox"/> Excellent |

Other distinguishing features: (dents, decals, trailer hitch, interior, etc.)

GENUINE LEATHER

SEATS

5. Name and address of service station/garage: _____

Who performs routine maintenance service? ETHRIDGE BROS. GARAGE Date last serviced P

Who performs State MV inspection? _____ Date last inspected _____

6. Date car purchased July 7-92 New Used Purchase price \$ 18,000 - Not 50.

Trade-in _____ Allowance _____

Seller Dealer/Individual Name and Address ETHRIDGE BROTHERS.

How did you learn the car was for sale? LOOKED ON LOT

How was the car paid for? Cash Check

If financed, name and address of finance company BANK OF MISSISSIPPI

Account # _____ Balance Due \$ 0.00 Loan Terms 344.77 Months 36

Date of last loan payment made 6-27-95

Is account past due? Yes No How long? _____

Are keys in your possession? Yes No Ignition key # _____ Trunk key # _____

Do you have other theft insurance? Yes No Policy # _____

Name of insurance company _____

Was this a rebuilt wreck? Yes No If yes, name of rebuilder _____

Was it a recovered theft? Yes No If yes, date of theft _____

7. Amount for which you are making claim \$ _____

8. Are the answers you have given true to the best of your knowledge and belief? Yes No

Witness [Signature] Policyholder [Redacted] (signature) 10

Address P.O. Box 5355
Meridian Ms 39302

SUBSCRIBED AND SWORN TO BEFORE ME this 11 day of December, 1995

In Meridian, Randall County, Mississippi

Notary Public Cynthia Burt My commission expires: _____

My Comm. Exp. Expires January 3, 1996

IF TWO ENVELOPES ARE NEEDED REMOVE FLAP ON THE DOTTED LINE FOR CONVENIENT FILING

INSURED

CLAIM NO.

DATE OF LOSS

12-6-95

NAME

STATUS

DATE TAKEN

BY WHOM

NE
12-7-95
I mean
hid in car - slip was in of
10000. He said car was on fire
the way I could front & left car
on fire - black smoke - no fire
inside - tried to open window it
but couldn't get it open. did
not know how but it was water.
how they couldn't put it out -
unknown

NAME

STATUS

DATE TAKEN

BY WHOM

wife
12/7/95
I mean
was watching movie - 1475 - heard
"frying" sound at door - opened door -
fire had been on fire - at the
1475 - he called 911.
They tried to put it out but
couldn't. left house because
I was out of control - got
away from house - saw or
heard car explode - had

Bill Stoney for AIC - Bob's date was
also worked on it for ignitarprobe
in 1964 but all I was was phony
wins.

To Word Processing for Transcription

FROM _____ DATE _____

PRIORITY

APPROVAL _____

STMT. _____

STMT. _____

STMT. _____

INSTRUCTIONS _____

DATE TRANSCRIBED _____ BY _____

State Farm Insurance Companies



November 22, 1996

State Farm Fire Claim
4910 29th Ave.
P.O. Box 3810
Meridian, MS 39303

Ford Motor Company
Parklane Tower West
Suite 300
1 Parklane Blvd.
Dearborn, MI 48126

ATTN: Mr. Don Vyhnalek
Mgr - Product Claims Dept.

Re: Claim Number: [REDACTED]
Date of Loss: December 6, 1995
Our Insured: [REDACTED]
Vehicle Data: 1992 Mercury Gran Marquis
VIN: 2MECM75W6N [REDACTED]

I am writing to you concerning damages sustained by the above referenced insured. The auto was involved in a non collision engine compartment fire while parked at the insured's home. The auto fire resulted in a total loss to the vehicle, home, and personal property insured by State Farm. The loss to the home and property totaled \$140,803.00 including our insured's deductible. This amount does not include the automobile which was insured by State Farm Mutual Automobile Company.

Our investigation reveals the cause of the fire to be related to failure of the alternator, or plug, or harness. Please contact me so that arrangements can be made to settle your obligation.

Please consider this letter as our claim to Ford Motor Company to reimburse State Farm Fire and Casualty Company for its interest of \$140,803.00. If you have any questions or feel that we may provide additional information, please contact us.

Sincerely,


John R. Iverson
Claim Specialist
State Farm Fire & Casualty
601-693-2788

State Farm Insurance Companies



November 21, 1996

State Farm Insurance Claim Office
4810 25th Avenue
P. O. Box 3810
Morden, NE 68701-3810

Ford Motor Company
P.O. Box 8630
Metairie, LA 70011

RE: Claim Number: [REDACTED]
Date of Loss: December 8, 1995
Our Insured: [REDACTED]

Dear Gentlemen:

I am writing to you concerning damages sustained by the above referenced insured. This property is insured by our Company. The damages amounted to \$140,803.00 including our insured's deductible.

Our investigation indicates that you are responsible for these damages and we are looking to you for reimbursement.

If you are insured, please refer this letter to your insurance carrier for discharge of your liability and inform us as to your company's name and your policy number. If you do not have insurance, please contact me immediately so that we can make arrangements to settle your obligation.

If you have any questions, please call me at the number below.

Sincerely,

John Iverson
Claim Specialist
State Farm Fire and Casualty Company
(601) 693-2788

COPY

State Farm Insurance Companies



August 13, 1996

State Farm Fire Claim
4910 29th Ave.
P.O. Box 3810
Meridian, MS 39303

Ford Motor Company
P.O. Box 8630
Metairie, LA 70011

Re: Claim Number: 24-F022-406
Date of Loss: December 6, 1995
Our Insured: Lawrence R. Billow
Margie K. Billow

Dear Gentlemen:

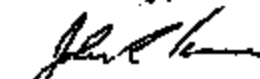
I am writing to you concerning damages sustained by the above referenced insured. This property is insured by our Company. The damages amounted to \$140,803.00 including our insured's deductible.

Our investigation indicates that you are responsible for these damages and we are looking to you for reimbursement.

If you are insured, please refer this letter to your insurance carrier for discharge of your liability and inform me as to your company's name and your policy number. If you are self insured, please contact me immediately so that we can make arrangements to settle your obligation.

If you any questions or feel that we may provide additional information, please call me at the number below.

Sincerely,


John R. Iverson
Claim Specialist
State Farm Fire & Casualty
601-693-2788

EA82-829 37518

State Farm Insurance Companies



Jackson North Service Center
403 W. Porter Street
Ridgeland, MS 39157
Telephone: (601) 836-1200

MEMO TO: Malcolm Houston, Claim Representative
FROM: Pat Dunne, Claim Superintendent
RE: [REDACTED]
Claim Number [REDACTED]
DATE: July 11, 1996

Malcolm, this is the entire claim file involving the automobile fire. We were pursuing a possible subrogation claim against Ford Motor Company.

You have previously spoken with Andy Dyess in regards to this matter. They are pursuing the subrogation claim on behalf of [REDACTED]

As you are aware, you and I will be transferring to Birmingham, Alabama, in August. Please review this file with Claim Superintendent Dannye Smith and bring him up-to-date. They will make the decision as to how they wish to proceed with the subrogation claim.

Should you have any questions, please give me a call.

Thanks,


26/0711024