PE04-078
FORD
1/28/2005
BOOK 2 OF 12
ATTACHMENT F
PART 2 OF 6





Office of the General Counsel

#### PRIVATE A CONFIDENTIAL

Ford Motor Company Parkings There's West Suite 300 Three Parkinse Boulevard Dutribors, Michigan 48128-2568

November 18, 2004

State Farm Insurance PO BOX 9052 Charlotesville, VA 22906-9052 ATTENTION: CHRIS STANLEY

As: Claimant: D/O/E: Your Claim #:



We acknowledge your recently automitted subrogation claim. In order to assist un in evaluating your claim, we request that you provide us with the following information: (Please note that the information requested is in regard to the Ford manufactured vehicle.)

	11	A STATE OF THE STA
図	ί.	Attach statement with a complete description of the incident, including events that occurred poor to
2	17	and subsequent to the loss.
X	2.	Arcopy of the police and/or live report.
X X	3.	Original color photographs of the vehicle's collabor/lise damage & of the alleged detective part(s),
	•	from several different grages.
	4, -	Original color photographs of the inside of the vehicle showing the steering wheel, dash and roof
_		RHAS.
	5.	Original outer photographs of the accident / Era scene from several different angles.
図	8.	Attach a copy of your expert's report and the expert's deginal photographs.
X	7.	Attach the repair estimate, repair order, or your total loss worksheat for the
		vehicle's damage and any losses associated with this incident, and
X	8.	occies of draft psyments.  Attach the complete service history for the subject vehicle, including any tane-ups or
М	٥.	olichanges. In the field made services this vehicle himself.
form;	Pleas	e answer the following in the space provided. If you need additional space, please use the back of the
1071114		
6 (	9.	What was the <u>city</u> and <u>state</u> of occurrence: NA <u>Film C:Hy</u> <u>A)C</u>
( ) (2)	10.	The 17 digit vehicle identification number: LETex 19 LX Yell
	44	Wile has the misage at time of occumence. April 22.000 (Der O )
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_	12.	What is the allegad delect:
Lab Pe	•	Brake pressure switch (Cruisecoptod dearths ton switch)

3 3-0645-289

13.	Has the alleged defective part been repaired or replaced? (circle one) Yes or (No.)
14.	What is the current location of the vehicle, and the elleged defective part(s)?  Adults Impact, stock # YLM 21a Clayton, NC
15.	List all after market additions or modifications that were made to the vehicle:
18.	Was the engine running? (circle one) Yes or (60)
17.	Were the keys in the lightion? (circle one) Year or (10)
18.	Was this vehicle purchased new or used:
-	If purchased used, provide the date of purchase, mileage at the time of purchase, and from whom the vehicle was purchased: Loe Outer Court pany, Wilsonic, Name by, 2002.  Purchased of Chic his son's 14050 and do

Once we are in receipt of the requested information, it will be reviewed and you will be notified of our decipion concerning your claim. Should you not send all of the requested-information and materials, we will assume that you are not interested in pursuing a claim and we will close our like. Please note that your vehicle will not be inspected until all the above information has been exampled and a parameter has been made as to whether an inspection is warranted.

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

Please Note: If you propose to repair the vehicle for continued usage, such repairs may not be performed until after Ford Motor Company has inspected the vehicle and samoved and tested any component part you claim to be defective or advised you in writing that it does not intend to perform such inspection and/or testing at this time. But even in that event, Ford Motor Company will instal that all components claimed to be defective are maintained and preserved for tital.

Sincerely,

Shawa L. Norton Claims Analyst / Liligation Assistant

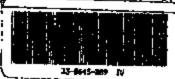


State Farm Mutual Automobile Instance Contrary ₫

State Farm Fire and Casselly Company

State Farm County Mutual Insurance Company of Texas

State Farm Indomnity Company



PROOF OF LOSS - VEHICLE FIRE (If this form is not being filled in on-line - all questions must be completed in ink.)

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with State Farm? Yes RYNo									
Were any clothes, luggege, ansfor personal effects in the vehicle damaged? [ ] Yes [ ] No									

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Page 1 of 2

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NM 33-6645-289

# Langham and Associates, Inc.

P.O. Box 1227

Morehead City, North Carolina 28557

STEVE W. LANCHAM, CFL President 252/247-9256 FAK: 252/247-9258

INVESTIGATION REPORT
REPORT NUMBER

PRIVILEGED ANDOGRAFICENTIAL

POEDAREN FIND

State Farm Institute Company 4140 Parkiake Ayunne-Suite 400 Raleigh, NC

ATTENTION:

Mr. Chris Stanley

INSURED:

DATE OF LOSS:

LOSS LOCATION:

POLICY HARBER:

CLAIN MINBER:

FILE NIMBER:

October 5, 2004

Adessa Clayton, NC

Unknown

3?-064.5-789

A-04139-02

NM 33-0645-284

Case No. A-04139-02 Insured:

- 2 -

October 23, 2004

#### ASSIGNMENT

I received this assignment on Thursday, October 14, 2004 from Mr. Chris Stanley with State Farm Insurance Company. Mr. Stanley requested an investigation to determine the origin and cause of the loss. My investigation commenced on Friday, October 15, 2004.

# SUMMARY OF ORIGIN AND CAUSE

This fire originated within the left rear quadrant of the engine compartment at mid to upper level hetween the left rear corner of the engine block and the master brake cylinder at/near the firewall. The following facts support this opinion: concentration of fire damage and born patterns to this area; and minumation from Insured

Although this does appear to be an accidental fire, the cause is undetermined due to the degree of fire damage and destruction to potential firel and ignition sources located within the area of origin. I purposely limited my inspection of the engine compartment to a visual examination and photographing to prevent any issue of spolistion should subrogation urise as a result of this loss, as further attempts to determine the specific cause of the fire will require a mechanical/electrical engineer. The following facts support this opinion: origin of the fire, itself, elimination of other areas of the vehicle; and information from Insured to also include the fact that the vehicle had been in operation for approximately three hours prior to the fire being discovered.

#### **EXAMINATION**

I inspected the insured's vehicle at Odessa Impact in Clayton, North Carolina on Friday, October 15, 2004. The vehicle is a 2000 Ford F150 XLT Sport 4x4 pickup track, displaying Vehicle Identification Number IFTRX18LXYN manufactured on 10/99. There was no license plate on the vehicle. The partial remains of a North Carolina Inspection Sticker indicated the inspection would expire sometime in the year 2005 and due to the vehicle's electrical system, I was unable to determine the odometer reading.

#### Exterior

With the exception of fire damage, the exterior of the vehicle appeared to be in good condition with no evidence of pre-fire or repaired collision damage or outerbody panel rust through. The outerbody panels surrounding the engine compartment and the windshield exhibited the only exterior fire damage with the remaining portions of the vehicle exhibiting no fire damage. The engine compartment hood sustained the braviest concentration of fire damage and included the almost total consumption of it. The left front quarterpanel exhibited a heavier concentration of fire damage than did the right front quarterpanel, which sustained only a minimal amount of fire damage. An overall exterior inspection indicates the fire originated within the engine compartment and extended to these other areas.

Cese No. A.04130\_07 Insured:

-3-

Öctober 23, 2004

All four wheels and tires were present and matched, with the tires showing no abnormal wear patterns. The left front tire did sustain some burn damage to its interior-facing side.

There were no indications of pre-fire forced entry at the doors or hood. All windows were in the closed position at the time of the loss.

## Rusine Compartment

This vehicle was powered by an 8-cylinder, gasoline-fueled, fore-sit mounted engine with an automatic transmission. Overall fire damage in the engine comparament is most severe at the mid to upper level extending from the firewall forward to just behind the radiator. The overall distribution of fire damage indicates the fire originated in the left rear quadrant of the engine compartment at the mid to upper level between the left rear owner of the engine block and the master brake cylinder at or near the firewall. The entire engine compartment has been severely to moderately damaged by the fire. A visual inspection of the engine compartment indicated all normally expected components were present. There is no visual indication that the engine was unserviceable before the fire. The only remaining measurable fluid, the engine oil, was found to be up to normal operating levels.

The 12-volt bettery was present and connected at the time of the fire. Although I found no concentration of electrical damage within the engine compartment, or elsewhere, the degree of fire damage and destruction was such that some electrical components may have been totally destroyed or at least rendered unidentifiable. A detailed inspection of the power distribution box, or fuse panel, within the engine compartment could not be made due to fire damage.

The vehicle's exhaust system is intact from block to tailpipe with no evidence of alterations or fire causing failure. The catalytic converter is in place. I found the gas cap still attached at the filler neck assembly. There were no foreign objects, unexpected materials or fire damage in the filler neck or gas cap area. The fuel distribution system in the engine compartment, particularly on the left side of the engine, is severely damaged by the fire with some of the connecting rubber covered fuel lines totally communed by the fire. There was no evidence of any pre-fire tampering on any of the remaining components.

#### Interior

The interior of the passenger compartment did sustain some localized heavy fire damage but overall, the passenger compartment is only slightly damaged by the fire but did sustain heavy smake damage. The heavy concentration of fire damage was found on top the dash, extending from the center over to the left side, as well as some additional fire damage down at the left front floor area at the firewall, itself. Additionally, the forward or leading edge of the roof liner within the passenger compartment at the top of the windshield also sustained some fire damage, as did the windshield, itself. An overall interior inspection of the passenger compartment indicates the fire entered the passenger compartment through the windshield and firewall and did not originate within the passenger compartment.

Case No. A-04139-02 Insured:

-4-

October 23, 2004

During removal of all interior debris, the only content items found included a ball cap and the vehicle's audio system. All other personal content items appeared to have been removed prior to the movement of the vehicle from the loss location to the salvage yard.

No samples were obtained from the interior as there was no origin within the interior of the passenger compartment, nor did I remove any samples from any other portions of the vehicle.

### INVESTIGATION

Insured and a said that this vehicle was purchased new in October of the year 2000 from Lee Ford in Wilson, North Carolina. He said they initially lessed the vehicle but then ended up actually purchasing it. He said that he did not add any aftermarket items to the vehicle after purchasing it.

Insured said that he performs all the maintenance on the vehicle, himself, and that the only thing he has had repaired were the brakes. He said he has had at least two sets of brakes placed on the vehicle since owining it. He said he did not know the exact mileage but estimated the mileage on the vehicle at the time the fire occurred was between 72,000 and 82,000. He said up until the time of the fire, he had had no electrical problems with the vehicle nor had he had any mechanical problems with the vehicle. He said that the vehicle was equipped with cruise control although he very sekdom used it. He said the did attempt to use it approximately two weeks ago and found that the cruise control was not working. He said he could not recall how long it had been before he had tried to use the cruise control two weeks prior to the fire. He said he had not had a chance to have this cruise control problem checked out prior to the vehicle checking on fire.

Insured lateral said that he had returned home from work around 5:00 p.m. on the day of the fire, which was Tuesday, October 5, 2004. He said upon returning bome from work, he immediately set about to care for his horses, which require him to haul feed and water to them. He said he was utilizing this same vehicle and continued to drive around and take care of his horses and finally stopped approximately three hours later. He said the total driving time from when he left work to when he parked the truck in his driveway, just prior to discovering the fire, was approximately three hours. He said the vehicle was in continuous operation during that three hour period of time.

Insured said after parking the vehicle in his driveway, he went inside, cleaned up and went to bed and that approximately one hour after parking the vehicle in his driveway, his wife advised hun that she could see fire coming out from under the left front wheelwell and near the base of the windshield from within the engine compartment. He said they called "911" and the Silver Lake Volunteer Fire Department responded. He said he did attempt to extinguish the fire but was unable to do so.

Insured said that during the three hours that he had been operating the vehicle that evening, he did not see, hear, or smell anything different or unusual. He said he was traveling alone. He said the only problem he had had with the vehicle, as he had previously advised, was that the cruise control was not working and he did not know how long that had been inoperable.

NIA 35-0645-289

October 23, 2004

Case No. A-04139-02 Insured:

# COMMENTS

I do not plan any additional investigation activity on this file. If you have any questions, comments or additional instructions, please advise.

Dave Marshall, CFI New Bern, North Carolina (252) 637-9120

cc: Steve Langham, CFI

# **ENCLOSURES**

1. Thirty-three (33) Color Photographs With Photograph Explanation Sheet

# State Farm Insurance Companies



October 25, 2004

Charlotosvéle Operations Center Attn: Raleigh Auto Claims PO Box 9052 Charlottesville, VA 22906 5052 Phone: 800-248-6207 Fax: 688-298-2330

Ford Motor Co., Parklane Towers W. Ste 400 3 Parklane Blvd Dearborn, MI 48126-2568

The COMPANY WHY 4 3 2004

September 1. Marsh SEL

RE: Claim Number: 33-0645-289

Date of Loss: October 5, 2004

Insured:

Dear Sir or Madam:

The identified 2000 Ford F150 pickup, VIN#1FTRX18LXYN insured by State Farm Mutual Automobile Insurance Company. Thie vehicle experienced an engine compartment fire.

State Farm would like to give you an opportunity to inspect the 2000 Ford F150 and give you advance notice of our potential subrogation claim.

Please contact me at (919) 789-3889 to set up a time for your inspection.

Sincerely,

Chris Stanley

Claim Representative

Chris Stanley joh

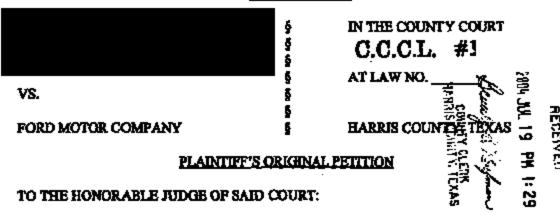
State Farm Mutual Automobile Insurance Company

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HOME OFFICES: BLOOMINGTON, ILLINOIS 61710-0001



NO.\_\_\_\_



COMES NOW the above-named Plaintiff, complaining of the above-named Defendant, and for cause of action would respectfully show the Court the following:

J.

Plaintiff hereby designates that discovery is intended to be conducted under Level Two of Rule 190, Texas Rules of Civil Procedure.

Ħ.

The Plaintiff is a corporation doing business throughout the State of Texas. Defendant Ford Motor Company is a corporation doing business in the State of Texas and can be served by serving its registered agent, C.T. Corporation System, with citation at 350 N. St. Paul, Dallas, Texas 75201.

Ш.

# FACTS

On or about December 28, 2003, were the owners of a 2000 Pord F-150 pick-up truck. On that date the truck was parked outside their residence at 120 River Rd., Champelview, Harris County, Texas. At approximately 2:30 a.m. the parties were alerted by their daughter that the truck was on fire. Despite the efforts of Mr. PLAINTIFF'S ORIGINAL PETITION - Page 1

the track was totally destroyed by the fire and later declared a total loss. The Plaintiff's representatives and investigators later determined that the fire was caused by a defective brake pressure switch on the front of the brake master cylinder, which generated sufficient best to ignite the surrounding combustible parts.

ĮV.

#### PRODUCT LIABILITY CLAIM

The Defendant is engaged in the business of designing, manufacturing, and selling automobiles and trucks to the public. The Defendant, acting through its agents, servants, and employees, designed and manufactured the vehicle owned by

The design of the vehicle was defective in that the Defendant knew or should have known that the brake pressure switch could be involved in a fire without notice or warning to suyone. Defendant falled to recall the brake pressure switch design defect and/or defects caused the fire and Pinintiff's resulting damages.

٧.

#### NEGLIGENCE OF FORD

The Defendant was negligent in the designing and manufacturing of the Ford F-150 pick-up truck bought and owned by Such negligence was the proximate cause of the damages sustained by Such negligence was direct and proximate result of the negligence of the Defendant in the manufacture and design of the F-150 pick-up truck, their motor vehicle was damaged by fire in an amount within the jurisdictional limits of this Court. Such negligence was the direct and/or proximate cause of Plaintiff's damages.

PLAINTIFE'S ORIGINAL PETITION - Page 2

## BREACH OF WARRANTY CLAIM

Pleading further, if the same be necessary, Plaintiff would show that the truck owned by the Defendant was protected by a warranty issued by the Defendant for the benefit of all its customers. This warranty extends to and protects the customers of the Defendant from any manufacturing defects or faults for a certain period of time. Plaintiff brings this breach of warranty claim against the Defendant as the product sold to warranty claim against the Defendant as the product sold to

VII.

warranty was the direct and/or proximate cause of Plaintiff's damages.

#### DAMAGES

As a result of the above and foregoing acts or omissions by the Defendant, Plaintiff has been damaged in the sum of at least \$16,295.27. The pick-up truck was declared a total loss and was worth at least that sum on December 28, 2003.

VIII.

Plaintiff would further show the Court that at the time of such incident, were the owners of the Ford 150 pick-up truck, and because of said damages incurred in this collision, there was a loss in the fair market value of such property in Harris County, Texas, of at least \$16,295.27.

IX.

#### SURROGATION

Plaintiff, would further show the Court that PROGRESSIVE INSURANCE COMPANY, is asserting its subrogation interest as to the benefits paid under its policy of insurance with 
PLAINTIFF'S ORIGINAL PETITION - Page 3

Samuel Smith which benefits total the sum of \$15,553.97, and as such, PROGRESSIVE INSURANCE COMPANY is the true owner of that portion of this cause of action.

X.

## ATTORNEY FEES

Plaintiff has had to retain an attorney to represent it in this case. Plaintiff is entitled to recover all reasonable and necessary attorney's fees for pursuit of its breach of warranty claim.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that the Defendant be cited to appear and answer herein, and that upon final hearing hereof, Plaintiff have and recover judgment against the Defendant, in an amount within the jurisdictional limits of the Court, regether with its costs and disbursement herein; statutory interest both before and after judgment; attorney fees, and for such other and further relief, at law or in equity, to which Plaintiff may be entitled.

Respectfully submitted,

LAW OFFICES OF TERRY CARNES

TERRY CARNES

Bar Card No. 03830400

12900 Preston Road, Suite 410

Dallas, Texas 75230

(972) 661-5021 (972) 661-2418 (FAX)

ATTORNEY FOR PLAINTIFF.

# Forensic Analysts, Inc.

#### **PRELIMINARY**

# REPORT OF FINDINGS

CLAIM NO: 032 080 521

INSURED:

# Prepared for:

PROCRESSIVE INSURANCE COMPANY 2950 NORTH LOOP WEST, SUITE 300 HOUSTON, TEXAS 77092

ATTN: MS. SUSAN POOLE

President -

January 15, 2004

FAI File No. 3096

Abjams, CR, CFEI, ASE, CVFI

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## I. INTRODUCTION

Reportedly, on December 28, 2003, a vehicle fire occurred, involving a 2000 Ford F-150 Pickup vehicle. On December 29, 2003, Forensic Analysts, Inc. was retained by Ms. Susan Poole of Progressive Insurance Company, to inspect the vehicle, and determine the origin and cause of the vehicle fire.

On December 30, 2003, Mr. Jeffrey Abrams, CPI, CFEI, ASE, CVFI of Forensic Analysts, Inc., inspected and photographed the Ford F-150 vehicle at 120 River Road, Channelview, Texas 77530.

Samples of the engine oil and automatic transmission fluid were taken, should an oil analysis be desired, to help determine pre-fire condition of the engine and/or transmission. These samples are being stored at the offices of Forensic Analysts, Inc., pending further instructions from Progressive Insurance Company.

This report is based upon information available to us at this time, and is not necessarily final. Should additional information be presented or discovered, we reserve the right to review and, if necessary, revise this report and our conclusions in light of that information.

relating to brake pressure switch failures on these Ford F-150 vehicles, we recommend that Ford Motor Company be put on notice, and be held fully accountable for this fire loss

# III. DISCUSSION

# INTERVIEW WITH THE INSURED

An interview with the insured, (who shall be further referred to as "he" in the body of the report), helped construct an order of events immediately preceding the onset of this vehicle fire:

- He stated that he had been experiencing no problems with the vehicle at all.
- They went out to eat, returned home, and parked the vehicle at 8:00 p.m., the evening before the fire.
- At approximately 2:20 a.m., or approximately six-and-a-half (6½)
  hours after they parked the vehicle in their front yard, they were
  afterted to the fact that a vehicle was on fire.
- 4. When they ran out of the house at 2:20 a.m., on the date of the loss, they noticed that the fire was in the back portion of the engine compartment, immediately in front of where the driver sits.
- They stated that the vehicle had never been involved in an accident.
- They thought that the vehicle had between 68,000 and 70,000 miles on it, at the time of this fire.
- The only repairs that had been performed on the vehicle had been those of oil changes. They take it to a Quik Lube place for

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maintenance.

- They stated that the vehicle did have an aftermarket alarm on it, and that it was installed approximately one-and-a-hatf (1%) years ago, at a facility on Sheldon Road.
- The vehicle was locked, and the alarm was on, at the time of the fire.
- 10. They stated that there was no indication of a problem on the vehicle dash, prior to the onset of the fire, and that they had been experiencing no problems with the vehicle, at all. However, they never used the cruise control, and they could not verify if the cruise control was operational at the time of the fire.

The scope of our inspection was to perform a vehicle fire origin and cause.

#### FORD VEHICLE IDENTIFICATION

The vehicle was identified as a brown, four door, 2000 Ford F-150 vehicle, bearing Texas license plate number and vehicle identification number affirmation. The vehicle was manufactured in January of 2000. Both the Texas Department of Public Safety inspection sticker and vehicle registration stickers were determed, and could not be read, at the time of our inspection. At the time of our inspection, the adometer could not be read, as it was mildly deformed as a result of exposure to heat. The vehicle was equipped with an automatic transmission.

#### FORD VEHICLE INSPECTION

Our inspection of the **vehicle** exterior, which relates to pre-existing **body damage** revealed no indication of pre-existing body damage, at all. All paint appeared to be OEM (Original Equipment Manufacturer). There were no areas of significant impact, and no evidence of prior damage that had been repaired, prior to this inspection.

Our inspection of the vehicle exterior, which relates to a vehicle fire, revealed:

- There was no fire damage, or communicated heat or smoke damage, on the rear bumper, tailgate, or left or right truck bed sides.
- Both right rear and left rear tire and wheel assembles were intact, attached, and unaffected by this five.
- Both right rear and right front door panels were only covered with a mild layer of soot. There was no damage as a result of exposure to heat or fire, at all. And, both right side door glass was intact, and attached, at the time of our inspection.
- The right side exterior mirror was also only covered with a mild layer of soot. There was no indication of even any deformation of the plastic composite housing.
- 5. As we continued to move forward, we did observe that a greater amount of soot had covered the top portion of the right front fender. Piease note, however, that all of the paint on the right front fender was intact, attached, and uncompromised by the fire.

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- The right front tire and wheel assembly was also intact, attached, and fully inflated, and showed no indication of any compromise as a result of exposure to this fire.
- Comparing the right side to the left side of the vehicle, it must be noted that the left rear door panel was intact, and attached, and was not damaged, at all, as a result of the fire.
- 8. The left front door panel, however, although only mildly burned on the front three to six inches (3"-6"), was much more affected by heat and smoke than was the right side, as the right side was still fully intact at the time of our inspection.
- 9. The front three to six Inches (3"-6") of the left front door panel was covered with a thick layer of soot, and the left side exterior mirror plastic composite housing was burned, and seriously deformed, as a result of exposure to heat. Obviously, this fire was much more intense on the left side than the right side of the exterior.
- 10. As we continued to move forward, it must be noted that the rear two thirds of the left front fender was severely burned, consuming ninety percent (90%) of the paint on the rear two thirds. The front third of this left front fender, however, still contained intact, and attached paint, unburned as a result of exposure to heat and fire. Obviously, the fire intensification was much greater on the rear two thirds of the left front fender, than on the front third of the left front fender. As there was unconsumed, and unburned, paint on the rear edge on the bottom of the left front fender, and there was only burned, but unconsumed paint on the top half of the rear three inches (3") of the left front fender, this fire was distinctively contained to the rear portion of the left side of the engine

compartment.

- 11. The left front lire and wheel assembly was the only severely burned fire and wheel assembly. It was deflated as a result of exposure to heat and fire. It was, however, primarily intact at the time of our inspection.
- 12. The front bumper, front grille, and both right front and left front headkamp assemblies were intact, and attached. The only evidence of burn on these areas was that immediately above, and behind, the left front headkamp assembly. Additionally, the entire front grille was covered with a relatively thick layer of soot.
- 13. The front windshield, although severely cracked as a result of exposure to heat, was shattered, and broken apart, immediately in front of the steering column. There was an area on the bottom left corner of the front windshield that had broken apart as a result of exposure to heat and fire. The remaining two thirds of the front windshield were still intact, and attached, atthough cracked as a result of communicated heat damage.
- 14. The closed vehicle hood was severely burned on the rear two thirds and the left side two thirds. Simply stated, there was an unconsumed section of the vehicle hood on the right side eighteen inches (18"), from the rear toward the front of the engine compartment, as well as on the front twelve to eighteen inches (12"-18"), from the right to the left side of the engine compartment. Ninety percent (90%) of the aluminum alloy hood was consumed above the engine, to immediately above the left rear-situated power distribution panel in the engine compartment. This scalloping out of the closed vehicle hood, and the consumption of

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this vehicle hood, was greatest from the power distribution panel to approximately twelve Inches (12") to the right of the brake master cylinder. This was the only section of the left rear corner of the engine compartment that contained no motten and resolidified aluminum immediately above the firewall. This would be consistent with a fire having been most intense immediately surrounding the brake master cylinder area in the left rear corner of the engine compartment.

in **summary** of our inspection of the **burn patterns**, relating to this **vehicle** fire, the following observations are made:

- The fire was most intense in the left rear corner of the engine compartment, prior to spreading from the rear toward the front of the left side of the vehicle.
- 2. The fire was distinctively teast intense on the right side of the vehicle, as virtually all of the paint was intact, and attached, on the entire right side of the vehicle.
- All evidence was consistent with an area of most intense burn immediately above the brake master cylinder, in the left rear corner of the engine compartment.

Our inspection of the vehicle interior revealed:

- The intact, attached, and unburned interior rear bench seat.
- The intact, attached, and unburned front two bucket seats.

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- The intact, attached, and unburned flooring material throughout the vehicle interior.
- 4. Primarily intact, and attached, interior door panels. The only door panel that was mildly affected by this fire was that of the burn on the top front Iwelve-inch (12") section, immediately neighboring the burned vehicle dash.
- We observed primarily the intact, and attached, steering column.
- 6. We observed an only mitally burned vehicle dash. Ninety percent (90%) of the vehicle dash was infact and attached. The only section of the vehicle dash that was burned was that immediately above the steering column on the top face on the top portion of the left side face. This burn within the vehicle dash was distinctively upper level, consistent with a fire traveling from the engine compartment into the interior, and not vice versa.
- We observed that both passenger side and driver side air bag assembles were not deployed.
- All equipment appeared to be QEM (Original Equipment Manufacturer) within the vehicle Interior, with the exception of an aftermarket alarm system that was added.
- 9. As we traced the wiring associated with the alarm system, there was no evidence of any overcurrent situation, relating to the aftermarket wires that contributed to the onset of the fire.
- 10. We did inspect the fuse box area that was on the underside of the left side of the vehicle dash, and fuses No. 33 and 14 were blown, or

were not continuous at the time of our inspection. These relate to accessories, including the cruise control circuitry on this Ford vehicle.

Our inspection of the **engine** compartment revealed that this vehicle was equipped with a V8, multiport, tuel-injected engine, and an automatic transmission. Specifically:

- 1. The area of least burn was that area immediately below the unconsumed right side third of the closed vehicle hood. This section of the engine compartment contained mildly burned, but still fully intact hoses, plastic composite components, and rubber that were immediately below the unconsumed right third of the vehicle hood. This obviously was consistent with the area of least intense burn within the engine comportment, due to the primarily only upper level effect as a result of this vehicle fire.
- The right side engine fiberglass composite valve cover was primarily intact, and attached, and showed no significant evidence of any compromise.
- 3. As we continued to move from the right side toward the left side of the engine compartment, we did observe that the fire did intensify within the open-air environment in the front of the engine compartment. Fires often times intensify within the relatively openair environment in the front of the engine compartment. This fire was no different, as the fiberglass composite fan blades and plastic composite coaling fan shroud were primarily consumed. However, there was a section of unconsumed plastic composite material on the right side of the fan shroud, again, consistent with the fire having

been much less intense on the right side than the left side of the front of the engine compartment. It must also be noted that the aluminum alloy radiator fan clutch was still intact and attached, indicating that this fire did not substantially intensify within the openair environment in the front of the engine compartment, and likely, would be the result of a fire traveling to, and not originating, here.

- 4. As we confinued to move across the top of the engine from the right to the left side, if must be noted that a greater amount of plastic composite and rubber components were observed to have been consumed. We also observed that the wiring insulation was much more greatly consumed as we moved toward the left side of the engine. In fact, the left side of the upper radiator hase experienced severe burn and partial consumption, while the top of the radiator hase was primarily intact and attached. Obviously, this fire was distinctively traveling from the left toward the right side of the engine compartment.
- 5. The lower radiator hase, which was situated in the bottom portion of the left front corner of the engine compartment, was Intact and attached. The limited burn experienced by this lower radiator hase is indicative of a fire that was not substantially intense in the bottom portion of the left third of the front of the engine compartment.
- 6. As we continued to move from the front toward the rear of the left third of the engine compartment, we did observe that the left side engine valve cover was much more intensely burned than the right side engine valve cover. This, initially, is quite peculiar, due to the fact that the left side engine valve cover is very protected by brackets around it, and other components that encumber the flow of heat and fire. The right side engine valve cover is in a much

more open-air environment, and mare easily consumed, and burned. This, therefore, is another indication that the fire was traveling from, and intensified in the lett side of the engine compartment.

- 7. There was a power steering reservoir that was immediately to the right of the brake master cylinder. This power steering reservoir was severely burned, and partially consumed, only on the left side front. In fact, if we drew a line from the least burned to the most burned section of the power steering pump reservoir. It would point toward the very front portion of the brake master cylinder.
- 8. The brake master cylinder reservoir was consumed in this fire. However, the aluminum alloy brake master cylinder was primarily intact at the time of our inspection. It must also be noted that there was no evidence of any significant burn, whatsoever, on the bottom portion of this aluminum alloy brake master cylinder to indicate any fire intensity below the brake mester cylinder.
- 9. As we continued to move from the right side toward the left side of the engine compartment, it must be noted that the burn above the left front inner fender was very distinct, as there were unconsumed combustible materials and plastic composite reservoirs immediately to the left of the radiator, indicating that the fire was not significantly intense on the very front portion above the left front inner fender.
- 10. As we continued to move toward the rear, immediately above the left front inner fender, it must be noted that we observed relatively uniform burn surrounding the left rear-situated power distribution center. There was no distinct area of fire intensification. However,

the right side of this power distribution center was more severely burned than the left side. There was a scalloped portion on the very right side, consistent with the fire traveling from the right toward the left side of this power distribution center. This, again, would be consistent with a fire intensifying at, and immediately surrounding, the brake master cylinder and/or the brake master cylinder reservoir.

11. There was a brake pressure switch on the very front portion of the brake master cylinder that was still screwed into the boss. Even though the mechanical portion of this pressure switch was intact and attached, the diaphragm on the portion, immediately above the mechanical portion of this pressure switch, was severely burned, and had separated. It must be noted, however, that it was still attached to the wires, and was dangling in the very top portion of the left third of the engine compartment, at the time of our inspection.

A closer inspection of this separated electronics or top portion of the brake pressure switch revealed the following:

- This pressure switch was severely burned, and primarily consumed, at the time of our inspection.
- The burn was widespread within this pressure switch electronics, burning the interior as well as exterior.
- 3. All wires routed to this pressure switch were insulation-void.
- 4. Even though this pressure switch was, indeed, in the area of most

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Intense burn, identified in the left rear corner of the engine compartment, we find it peculiar that the burn within the interior of the pressure switch was as intense as it was, as this top electronic portion had separated, but was still attached to the wires. We took a plastic bag, and attempted to protect it, should other interested parties desire to view this separated brake pressure switch assembly.

All evidence, based on the burn patterns within the engine compartment, emanate from the area of most intense burn at, and above, the top portion of the brake master cylinder, in-between the right side of the left rear-situated brake power distribution center and the left side of the power steering pump reservoir. This area of most intense burn and area of fire origination is coincidental with the separated brake pressure switch. More specifically, the top portion, or top half, of the broke pressure switch that was secured to, and still within, the bass on the top front portion of the brake master cylinder had separated. The burn within the separated Top portion of the brake pressure. switch, which contained the electronics, was severe, widespread, and very deep. There were no protected areas within the internals of the separated brake pressure switch, consistent with the fire originaling within the interior of this brake pressure switch. We recommend that Ford Motor Company be put on notice, relating to the onset of this vehicle fire, relating to the only janition source in the area of most intense burn, as that of a failed brake pressure switch on the top front portion of the brake master cylinder.

We also inspected both the engine oil and automatic transmission fluid levels within the engine compartment. Both of the fluids were near their normal operating level, showed no evidence of any burn or contamination, and were consistent with a properly operating engine and automatic transmission for this year, make, and model vehicle. Samples of both engine oil and automatic transmission fluid were taken, should an oil analysis be desired to help determine

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pre-fire condition of the engine and/or transmission. It would not, however, be a recommendation to send these fluids out for analysis, as there is no indication of any contribution of the engine or transmission to the onset of this vehicle fire. All evidence is, therefore, purely consistent with a vehicle fire that originated subsequent to the vehicle having cooled down, as it sat outside of the residence, for in excess of six (6) hours prior to the observation of a vehicle fire in the very left rear corner of the engine compartment. This fire then spread from the left rear corner of the engine compartment toward the front and right side, distinctively, more intensely burning on the left side of the vehicle, and distinctively concentrating on the rear portion of the left side of the engine compartment. The only electrical component in the area of most intense burn is that of the electronics associated with the pressure switch on the top front portion of the brake master cylinder.

#### RECOMMENDATIONS...

We recommend that the 2000 Ford F-150 Pickup vehicle be retained, secured, and protected, regarding any further testing or inspection by other interested parties. We also reserve the right to be present, and observe any and all inspections or testing of the Ford F-150 Pickup, by any other concerned parties.

# IV. BASIS OF REPORT

# This report is based upon the following:

- Inspection of the 2000 Ford F-150 Pickup vehicle.
- 2. Interview with the insured.
- 3. Information and observations as noted in this report.

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## V. ATTACHMENTS

**PHOTOGRAPHS** 

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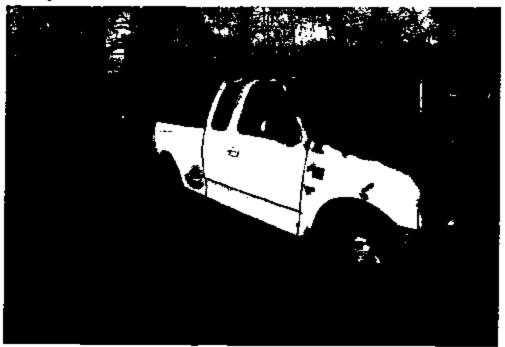
3. View of the front of the Ford vehicle.



View of the left side of the Ford vehicle.



3. View of the right side of the Ford vehicle.

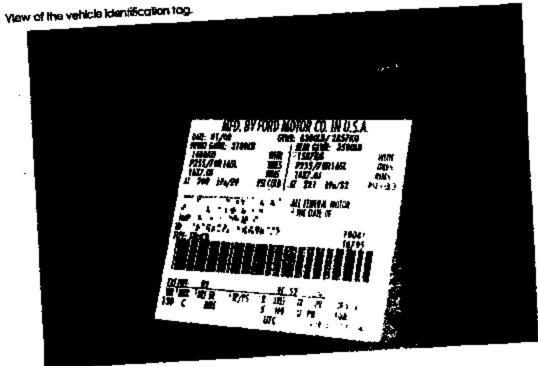


4. View of the rear of the Ford vehicle.



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4. ( - 6. . . . )



Overview of the burn experienced by the left trant fender. 6.



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Overview of the fourn experienced by the front windshield.

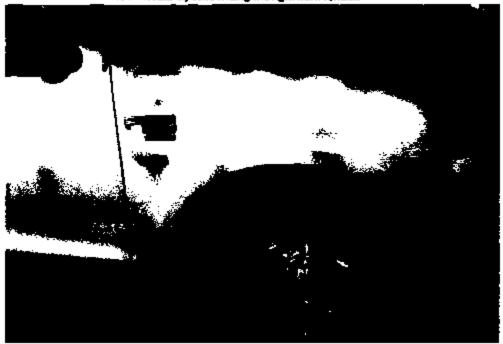


Overview of the burn experienced by the closed vehicle hood.



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View of the lock of burn at and immediately surrounding the right front fender.



10. Yiew of the lack of burn on the interior rear bench seat.



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11. Yew of the lack of born on the front two bucket seats.



12. Overview of the burn experienced by the vehicle dash.

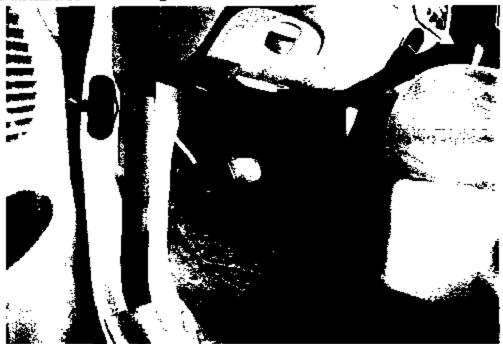


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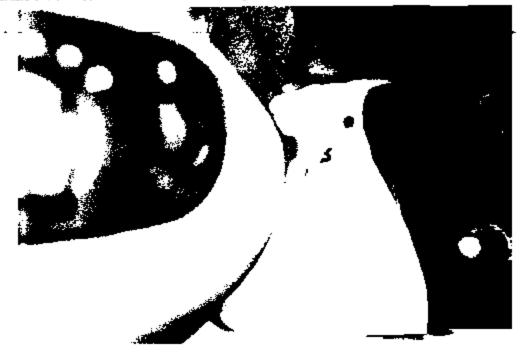
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13. View of the lack of burn on the flooring material below the vehicle dash as viewed from the left.

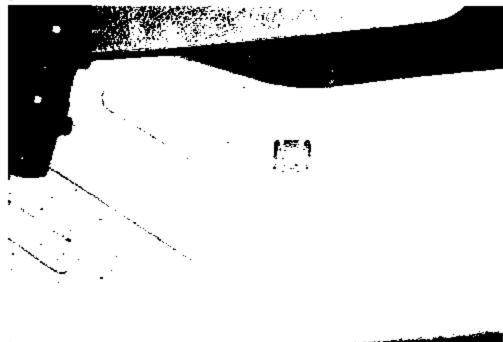


14. Overview of the LED area approximately two inches (2") to the left of the sleeting column on the vehicle dath, indicative of an attermarket alarm system.



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15. Overview of the No. 13 fuse.



16. Overview of the No. 14 fuse.



17.



View of the engine compartment as viewed from the left. 18.



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19. View of the engine compartment as viewed from the right.



Overview of the right holf of the engine comportment as viewed from the tett.



21. Overview of the front of the engine compartment as viewed from the left.



22. Overview of the area immediately surrounding the engine.



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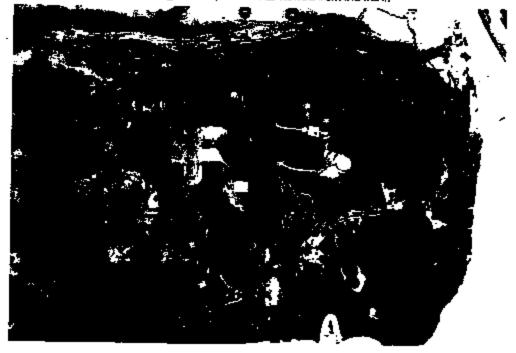
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Iop view of the front of the engine comportment.

Communication of the second



Overview of the left half of the engine compartment as viewed from the frant.



Closer view of the relatively undomaged right side engine valve cover.



26. Overview of the much more severe burn on the left side valve cover.



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parameter production of the second second



 Top view of the power distribution center as viewed from the left. Please note the mild scaloping of the combustible components closest to the broke master cylinder.



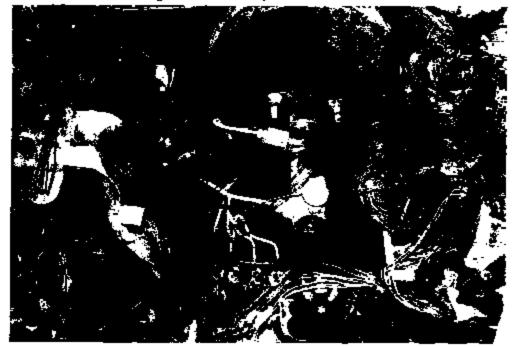
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Overview of the left rece corner of the engine comportment as viewed from the left.

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30. Overview of the crea surrounding the broke master cylinder.

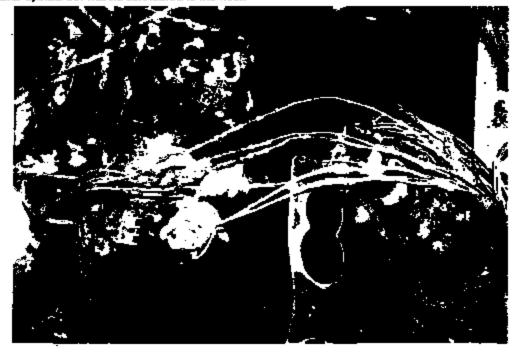


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3). Closer view of the pressure switch that was still secured to the front of the brake master cylinder.



 Closer view of the top of the pressure switch that had separated and fallen below the brake moster cylinder but was still connected to the wires.



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34. Claser view of this separated electronic partion of the pressure switch.



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Closer view of this separated electronic portion of the pressure switch.



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Closer view of this separated electronic portion of the pressure switch.



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